



Office Of  
Community  
Development

# FY 2025 LCDDBG Grantee Workshop





Office Of  
Community  
Development

# Order of Business



**01** Introductions

**02** Grant Agreement Conditions

**03** Financial Management

**04** Environmental Review Record

**05** Engineering

**06** Civil Rights

**07** Acquisition of Property

**08** Procurement of Contracts

**09** Labor Standards

**10** Monitoring, Closeout, &  
Program Amendments

# **Office of Community Development – Local Government Assistance Staff CDBG and CDBG-CV**

Traci Watts, Director

Heather Paul, Assistant Director, Citizen Participation

Fenishia Favorite, Policy and Program Coordinator, Labor, ERR

Jeff Tessier, Engineer

Janelle Dickey, Financial Manager, Economic Development, Audits

Denease McGee, Program Manager, Civil Rights, Procurement

William Hall, Program Specialist, Procurement

Kristi Kron, Program Specialist, ERR

Ashley Smith, Financial Analyst I, Economic Development, Audits

Kenya Wallace, Financial Analyst II, Economic Development, Audits

Liza Bergeron, Community Development Specialist III, Acquisition, ERR

Sarah Underwood, Community Development Specialist I, ERR, Labor

Teresa Holley, Community Development Specialist I, Labor, ERR

Kyra Johnson, Community Development Specialist I, Civil Rights, ERR



# Office of Community Development – Local Government Assistance Programs

- CDBG Program
  - Economic Development
  - Make A Difference
  - Public Facilities
  - Clearance Program
- Local Government Assistance Program (LGAP)
- Community Water Enrichment Funds (CWEF)
- Water Sector Program
- Recovery Housing Program





Office Of  
Community  
Development

# Stay Informed!

HUD Exchange:

<https://www.hudexchange.info/>

OCD\_LGA:

<https://www.doa.la.gov/doa/oed-lga/>



Follow us on Facebook:  
[Facebook.com/LaOCD](https://www.facebook.com/LaOCD)



Watch us on YouTube:  
**OCD-LGA**

## *Coffee Talk*

*Monthly online technical  
assistance opportunity (link  
available on OCD-LGA  
website)*

# Grant Agreement Conditions

Presented By: Kenya Wallace

**“Authorization to Incur Costs, Application Revisions,  
and Grant Agreement Transmittal” letter dated  
May 5, 2025**

**5 Month Deadline: October 6, 2025**

# *Authorization to Incur Costs*

- Authorizes administration costs (if applicable)
- Permits Environmental Review Record (ERR) to begin
- Permits Plans & Specifications to be prepared (*not applicable for clearance projects*)
- Describes penalties for not meeting deadlines; penalties are assessed for items listed in letter

**\*\*If there will be a problem with the time frame, contact your grant representative **early** to request an extension of time\*\***

**DO NOT ADVERTISE FOR BIDS OR BEGIN CONSTRUCTION AT THIS TIME.**



# *Transmittal of Blank Grant Agreement*

1. Sign the Grant Agreement and return with original signatures - **DO NOT DATE**
2. Additional forms needed to complete the Grant Agreement:
  - a. Electronic Funds Transfer (EFT): Contact Office of Statewide Reporting and Accounting Policy (OSRAP) at [\\_DOA\\_OSRAP\\_EFT@la.gov](mailto:_DOA_OSRAP_EFT@la.gov) or (225)342-1097 for the enrollment form. \*Do not use an existing form.\*
  - b. Voided Check or other form of Banking Detail: \*Sent with EFT Form to OSRAP\*
  - c. Send confirmation to our office of the submission to OSRAP

# Application Revisions and Additional Items

- Revisions to Application
- Financial Management Questionnaire (FMQ), Current Surety Bonds
- Residential Antidisplacement and Relocation Assistance Plan and Resolution
- Performance Schedule
- Procurement Policy, Procedures, and Resolution(s) (#6 on AIC Letter)
  - Procurement documentation for Administrative or Engineering services, if applicable.
- Environmental Review Record (ERR) – **must receive authority from OCD-LGA to publish final notice(s) and request release of funds by deadline**

# Application Revisions and Additional Items

- Plans & Specs and Final Cost Estimate – must only be submitted to OCD-LGA by deadline (not applicable for clearance projects)
- Violence Against Women Act (VAWA) Certification form
- TDD or equally effective method for communicating with hearing impaired persons.
- LRWA Rate Study for Sewer and Water projects.

# Other Documentation As Requested

- Acquisition Timeline (if applicable)
- Sam.gov Registration
- Verification of Professional Services Eligibility form
- Firm commitments for other project funds (if applicable)

Instructions for each item is included in the letter.



# Where are the forms?

**LOUISIANA**  
DIVISION OF ADMINISTRATION

DIVISION OFFICES ▾ STATE EMPLOYEES ▾ VENDORS ▾ RESOURCES ▾ 🔍

GRANT MANAGEMENT

Home / Division Offices / Office of Community Development - Local Government Assistance / LCDBG Programs / Grant Management - Forms and Handbooks

OCD-LGA News  
LCDBG Programs  
LCDBG Plans and Reports  
2015-2019  
2020-2024  
Public Facilities  
Clearance Program  
Economic Development  
Sustainable Water Management Consolidation Planning Grant  
Make a Difference  
Grant Management - Forms and Handbooks  
2021 Grantee Handbook Exhibits  
2023 LCDBG Grantee Handbook and Exhibits  
Grantee Handbook and Exhibits  
Section A  
Section B  
Section C  
Section D  
Section E  
Section F  
Forms and Information  
Grant Awards and Rankings  
LGAP and CWEF Programs ▾  
American Rescue Plan Act ▾  
Recovery Housing Program  
Staff Directory  
FAQs

## GRANT MANAGEMENT FORMS

[Financial Management Questionnaire](#)

[Request for Payment Form \(RFP\)](#)

- [OCD-LGA's RFP Review Checklist](#) - Use this form as a tool to check your RFP and invoices.

[Performance Schedule](#)

[Monitoring Checklist \(grants FY 2019 forward\)](#)

[Desktop Review \(grants FY 2019 forward\)](#)

[Monitoring Checklist \(grants FY 2017-FY 2018\)](#)

Note: All other grant management forms can be found under the Grantee Handbook for the grant year. Please remember when completing the Closeout Package to use closeout documents from the most recent Grantee Handbook.

## GRANTEE HANDBOOKS

[2024 Grantee Handbook and Exhibits](#)

[2023 Grantee Handbook and Exhibits](#)

[2022 Grantee Handbook](#)

[2021 Grantee Handbook](#)

- [2021 Grantee Handbook Exhibits](#)

[2020 Grantee Handbook](#)

- [2020 Grantee Handbook Exhibits](#)

[2019 Grantee Handbook](#)

- <https://www.doa.la.gov/doa/oed-lga/lcdbg-programs/grant-management-forms-and-handbooks/>

# Risk Analysis

Based on various factors, the Grantee has been identified as either a high, medium, or low risk.

1. **High Risk** – the OCD-LGA will make an on-site technical assistance visit prior to conducting the monitoring of this grant.
2. **Medium Risk** – The Grantee can request an on-site technical assistance visit prior to the date that OCD-LGA schedules to monitor this grant.
3. **Low Risk** – Technical assistance will be provided on an as needed basis.

Purpose of the technical assistance is to ensure that all compliance areas are adhered to as required.

# Knowledge Check...

**When are Application Revisions and Grant Agreement Conditions due?**

**October 6, 2025!**



# Financial Management

Presented By:  
Ashley Smith

# Internal Controls and Bonding

2 CFR 200.303

2 CFR 200.304



# Financial Management Questionnaire (FMQ)

- List the people who will perform various financial duties.
  - *At least two* people authorized to sign *Requests for Payments* (RFPs).
  - *At least two* people authorized to sign checks. They should be the only ones signing checks, and must be bonded or covered by a fidelity policy. *Should also correspond with bank authorized signors.*
- Person responsible for preparing fiscal year-end financial statements should have the skills and knowledge to apply Generally Accepted Accounting Principles (GAAP).
- *If there are changes in personnel, a new FMQ must be submitted for approval, along with current bonding.*

**LCDBG Financial Management Questionnaire**

Grantee: \_\_\_\_\_ Vendor #: \_\_\_\_\_ # of employees: \_\_\_\_\_

1. List those who will perform the following LCDBG financial management functions. Include titles.

a) Signs contracts:

\_\_\_\_\_

Title: \_\_\_\_\_

b) Receives invoices:

\_\_\_\_\_

Title: \_\_\_\_\_

c) Approves payment of invoices:

\_\_\_\_\_  
\_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

d) Prepares Requests for Payment:

\_\_\_\_\_

Title: \_\_\_\_\_

e) Signs Requests for Payment (*minimum of two required*):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

f) Records transactions:

\_\_\_\_\_

Title: \_\_\_\_\_

g) Maintains custody of checkbook:

\_\_\_\_\_  
\_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

h) Signs checks (*minimum of two required*): Must be covered by bond or fidelity policy.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

Title: \_\_\_\_\_

i) Reconciles bank statements:

\_\_\_\_\_

Title: \_\_\_\_\_

j) Prepares fiscal year end financial statements:

\_\_\_\_\_

Title: \_\_\_\_\_



2. Identify by title the individuals who are covered by a bond or insurance and the amounts. Include Mayor or Parish President if involved in signing checks (1.h).

**Attach a copy of the bond(s) or insurance policy(s).**

Title: _____	Amount: _____
Title: _____	Amount: _____
Title: _____	Amount: _____
Title: _____	Amount: _____

3. Identify name of company that issued the bond or insurance policy:

\_\_\_\_\_

Issue date: _____	Expiration date _____
Issue date: _____	Expiration date _____

4. What is your fiscal year end date? \_\_\_\_\_

5. The most recent audit covered what period? \_\_\_\_\_

Identify name of firm that prepared the audit: \_\_\_\_\_

6. Name, title, phone #, and email address of local official to contact regarding this questionnaire:

_____ <i>Name</i>	_____ <i>Phone #</i>	_____ <i>Email Address</i>
_____ <i>Title</i>		

**I certify that this information is true to the best of my knowledge.**

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# Surety Bond/Insurance Policy

- *The individuals authorized to sign checks must be covered by a Surety Bond or other Fidelity Insurance policy.*
  - Include a copy of the Surety Bond/Insurance Policy that specifically identifies the persons and/or positions insured with the Financial Management Questionnaire.
- *Documentation must show that the insurance or bonding is current*
  - This can be shown by either a current certificate, current invoice and proof of payment, or written documentation from insurance provider.
- *Documentation of current bonding is also needed each time the FMQ is updated, and at monitoring.*

# Cash Management and Payments

## 2 CFR 200.305



# Bank Account

- Separate bank account should be used for LCDBG funds.
  - *Must be a non-interest bearing account.*
  - Bank account utilized for other CDBG projects funded through our office may also be used.
    - *Must be used for all transactions including deposits & payments to vendors.*
  - Use pre-numbered checks, (not counter checks)
    - *Two signatures are required on all checks (only individuals authorized per FMQ) – DO NOT PRE-SIGN.*
    - Write the LCDBG Grant Agreement (contract) number on the check.

# Clearing Account

- **Prior written approval** must be obtained for use of a “general” or “central” bank account.
  - *All invoices must be paid in advance.*
  - *Checks must clear prior to reimbursement.*
  - *Separate financial statements for LCDBG funds must still be produced.*

# Program Income

## 24 CFR 570.489(e) & 24CFR 570.504

- *Gross Income that is generated by the use of LCDBG funds.*
  - *Interest earned on LCDBG funds incorrectly deposited into an interest-bearing account.*
  - *Contact the OCD for instructions if program income is received or if there is a possibility that it will be received.*
    - *\$500.00 or more in gross income from interest earned has to be returned to the state.*

# Accounting

- Source Documentation
  - Invoices, checks, bank statements as evidence of maintaining receipts and expenditures of LCDBG funds paid to contractors and other parties.
- *For reporting purposes the grantee should utilize a separate governmental fund to record LCDBG funding in either a Capital Projects fund or a Special Revenue fund.*
  - *CDBG regulations specifically require that financial reporting establish that funds were used for an eligible activity and **clearly establish that funds were not used for ineligible purposes.** (ex. General Government or Operating and Maintenance expenses are not eligible expenses)*
  - *LCDBG funds should not be transferred and expensed from another fund.*
  - *LCDBG revenue and program expenditures must be clearly identified.*
  - *LCDBG funds utilized for each project should be separately identified.*

# Accounting

## LOUISIANA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

### REVENUE

Increases in net current assets and are recognized in the accounting period in which they become measurable and available.

- Cr **Intergovernmental Revenues**  
Revenues from other governments in the form of grants.
- Cr **LCDBG Program Revenue**  
Revenue earned when allowable and allocable expenditures are incurred for an eligible activity of the program and reimbursable from funds obligated in the grant agreement with OCD.
- Cr **Local Revenue**  
Other local government funds transferred on a permanent basis to the CDBG program to provide additional financing of the program.
- Cr **LCDBG Program Income** (24 CFR 570.489(e))  
Gross income generated by the grantee through the use of CDBG funds.

### EXPENDITURES

Decreases in net current financial resources. Expenditures include disbursements and accruals of the current period. Expenditures do not include encumbrances. Allowable and allocable costs can only be incurred for eligible activities as defined by Section 105(a) of the HCDA and 24 CFR 570 Subpart C and are specified in the approved budget of the grant agreement.

- Dr **Administration** (24 CFR 570.206)  
Costs incurred for the purpose of general administration and management of the program. Costs may be incurred by employees of the grantee per 2 CFR 200.430 or independent contractor per 2 CFR 200.459 and procured per 2 CFR 200.320.
- Dr **Acquisition** (24 CFR 570.201(a))  
Costs incurred for the purpose of obtaining the use of real property to carry out the program.
- Dr **Engineering** (*Public Facilities and Improvements* 24 CFR 570.201(c))  
Costs incurred for design necessary to carry out the program and is considered part of "Construction" eligible activity below. Costs may be incurred by employees of the grantee per 2 CFR 200.430 or by an independent contractor per 2 CFR 200.459 and procured per 2 CFR 200.320.
- Dr **Construction** (*Public Facilities and Improvements* 24 CFR 570.201(c); *Economic Development* 24 CFR 570.203(a))  
Costs incurred for the construction, reconstruction, rehabilitation or installation of public facilities and improvements and excluding ineligible costs as defined in 24 CFR 570.207(b)(2).
- Dr **For Profit Business Assistance** (24 CFR 570.203(b) *Economic Development*). The provision of assistance to a private for-profit business, including, but not limited to, grants, loans, loan guarantees, interest supplements, technical assistance, and other forms of support, for any activity where the assistance is appropriate to carry out an economic development project.
- Dr **Rehabilitation Activities** (24 CFR 570.202(b)(6)) Connection of residential structures to water distribution lines or local sewer collection lines.
- Dr **Clearance/Demolition** (24 CFR 570.201(d))  
Costs incurred for the purpose of clearance, demolition, removal of buildings, and facilities improvements.
- Dr **Planning** (24 CFR 570.205)  
Costs incurred for the purpose of gathering data, preparation of studies, and identification of actions for the purpose implementing future community development projects.



# Accounting

## ASSETS

### CURRENT ASSETS

Resources that are available or can readily be made available to meet the cost of operations or to pay current liabilities.

*Dr*     **Cash**

Available bank deposits (non-interest bearing checking accounts) and currency, coin, and reimbursement checks to be disbursed within 3 working days of receipt.

*Dr*     **Grant Revenue Receivable**

Amounts due to the grantee from OCD for eligible costs incurred for the program.

*Dr*     **Due from Other Funds**

An asset account reflecting amounts owed to the CDBG program by a grantee's other funds. This account includes only short-term obligations on an open account.

## LIABILITIES

### CURRENT LIABILITIES

Those obligations which are payable within one year from current assets or current resources.

*Cr*     **Accounts Payable**

Amounts owed to vendors or organizations for goods and/or services furnished to the CDBG program. Accounts Payable does not include amounts due to other agencies, funds, or other governments.

*Cr*     **Contracts Payable**

Amounts due to contractors for public improvements on work done for the grantee's CDBG program are to be recorded as Contracts Payable.

*Cr*     **Due to Other Funds**

A liability account reflecting amounts owed by the CDBG to another fund when other funds advance resources to pay for eligible and allocable CDBG program costs.

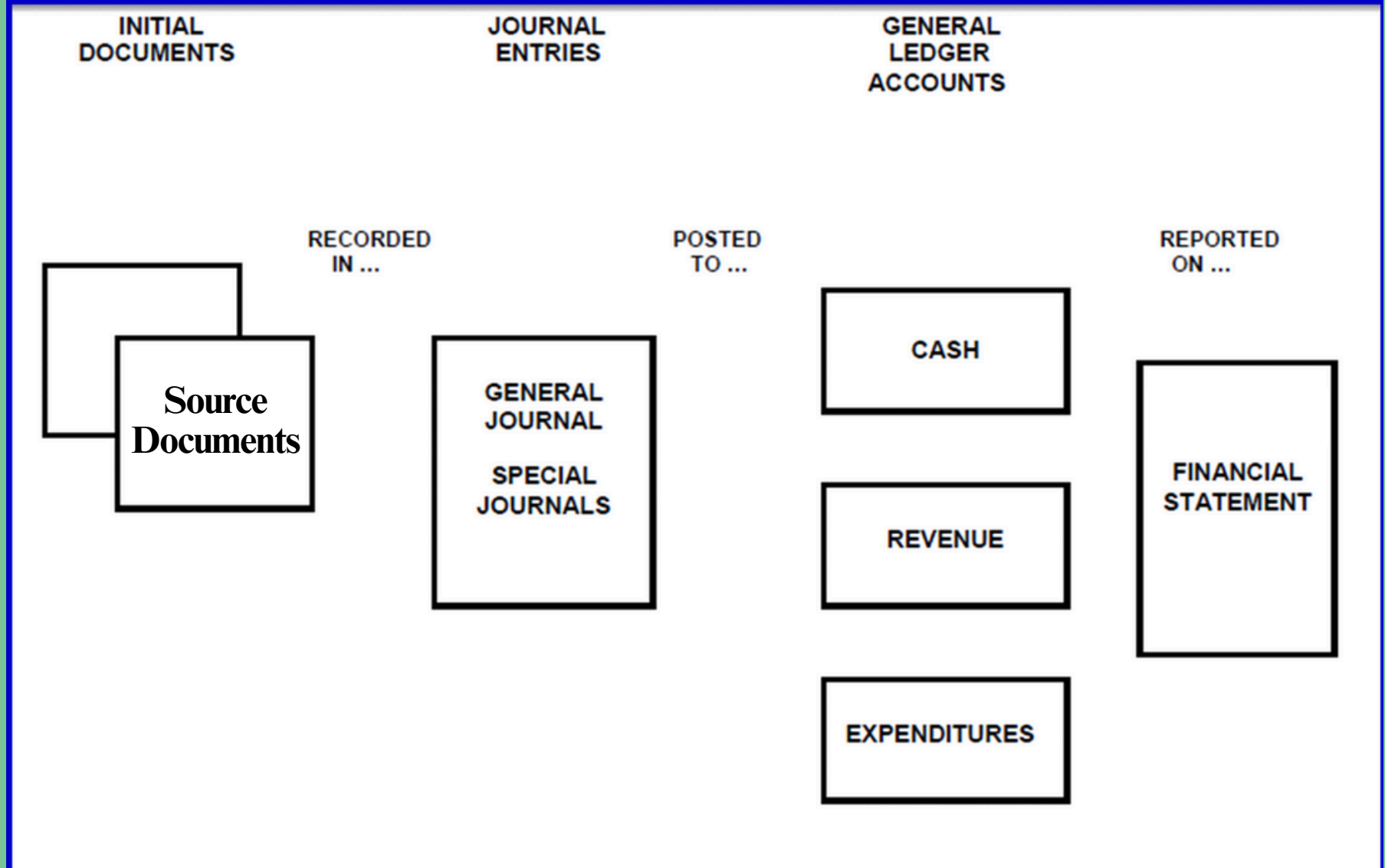
*Cr*     **Retainage Payable**

A liability reflecting amounts due on construction contracts not paid pending final inspection of the project or the lapse of a specified period, or both. The unpaid amount is usually a stated percentage of the contract price.

### FUND BALANCE

*Cr*     The difference between fund assets and fund liabilities. Governmental fund balances should be segregated into reserved and unreserved amounts.

# Accounting



# Accounting

## A-7: FINANCIAL STATEMENTS

**\*\*UNAUDITED\*\***

### **CITY OF LIGHTS**

**CAPITAL PROJECTS FUND  
STATEMENT OF REVENUES, EXPENDITURES & CHANGES IN FUND  
BALANCE  
FOR THE YEAR ENDED JUNE 30, 20\_\_\_\_**

#### **REVENUES:**

LCDBG Program	\$54,345
City	<u>7,455</u>
<b>TOTAL Revenues</b>	<b>\$61,800</b>

#### **EXPENDITURES:**

Administrative Services	\$12,500
Engineering Services	25,700
Project Construction	<u>23,800</u>
<b>TOTAL Expenditures</b>	<b>\$61,800</b>

<b>EXCESS (DEFICIENCY) OF REVENUES OVER EXPENDITURES</b>	<b>- 0 -</b>
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<b>FUND BALANCE, BEGINNING</b>	<b>- 0 -</b>
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<b>FUND BALANCE, ENDING</b>	<b>- 0 -</b>
-----------------------------	--------------

# Accounting

**\*\*UNAUDITED\*\***

**CITY OF LIGHTS**

**CAPITAL PROJECTS FUND  
BALANCE SHEET  
FOR THE YEAR ENDED JUNE 30, 20\_\_\_\_**

**ASSETS:**

Cash	\$ 1,500
Grant Revenues Receivable	<u>18,450</u>
<b>TOTAL ASSETS</b>	<b>\$19,950</b>

**LIABILITIES & FUND EQUITY:**

Accounts Payable	\$17,370
Due to City	2,480
Unearned Revenue	<u>- 0 -</u>
<b>TOTAL LIABILITIES</b>	<b>\$19,950</b>
<b>FUND BALANCE</b>	<b>- 0 -</b>

**TOTAL LIABILITIES AND**

<b>FUND EQUITY</b>	<b><u>\$19,950</u></b>
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# Code of Federal Regulations: Audit Requirements

## 2 CFR Part 200 Subpart F

“...standards ...for the audit of non-Federal entities expending Federal awards.”

### 2 CFR 200.501

*“Single audit.* A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted...”

**\$750,000 in total Federal expenditures, not just CDBG.  
(\$1,000,000 for fiscal years which began October 1, 2024 forward.)**

***CDBG funds are Federal Funds***

# Other Types of Financial Reports

- Annual audit if revenue received was \$500,000 or more.
- Review/Attestation if revenue received was \$200,000 or more but less than \$500,000.
- Annual Compilation if revenue received was more than \$75,000 but less than \$200,000.
- Annual Sworn Financial Statements if revenue received was \$75,000 or less.

# Audit Requirements

2 CFR 200.508

**It is the grantee's responsibility to:**

- Procure or otherwise arrange for the audit.
- Prepare appropriate financial statements, including the schedule of expenditures of Federal awards (if applicable).
- Provide the auditor with access to personnel, accounts, books, records, supporting documentation, and other information.
- Promptly follow up and take corrective action on audit findings.

# Audit Requirements

- *Grantee will be placed on the Louisiana Legislative Auditor's (LLA) Non-Compliance List if the audit is not received by the LLA within 6 months of the fiscal year end date.*
- *If grantee is on LLA's Non-Compliance List, they cannot receive CDBG funds.*
- *Note: If extension has been granted by the LLA, send a copy of LLA's approval to the LGR.*



# Knowledge Check...

**When should a new Financial Management Questionnaire (FMQ) be submitted and what must be submitted with it?**

**When there is an update or change to personnel and current bonding information covering the individuals must be submitted.**

# **Requests for Payment (RFP)**

**Requesting Program Funds From the  
Office of Community Development-Local  
Government Assistance (OCD-LGA)**

# Request for Payment Form

The screenshot shows the Louisiana Division of Administration website. The header includes the Louisiana state seal and the text "LOUISIANA DIVISION OF ADMINISTRATION". Below this is a navigation bar with links for "DIVISION OFFICES", "STATE EMPLOYEES", "VENDORS", "RESOURCES", and a search icon. The main content area is titled "GRANT MANAGEMENT". A breadcrumb trail reads: "Home / Division Offices / Office of Community Development - Local Government Assistance / LCDBG Programs / Grant Management - Forms and Handbooks". On the left is a sidebar menu with items like "OCD-LGA News", "LCDBG Programs", "LCDBG Plans and Reports", "2015-2019", "2020-2024", "Public Facilities", "Clearance Program", "Economic Development", "Sustainable Water Management Consolidation Planning Grant", "Make a Difference", "Grant Management - Forms and Handbooks", "2021 Grantee Handbook Exhibits", and "2023 LCDBG Grantee Handbook and Exhibits". The main content area lists "Grant Management Forms" with a red circle around the "Request for Payment Form (RFP)" link. Below this link is a bullet point: "• [OCD's REP Review Checklist](#) - Use this form as a tool to check your RFP and invoices." Other links listed include "Performance Schedule", "Monitoring Checklist (grants FY 2019 forward)", "Desktop Review (grants FY 2019 forward)", and "Monitoring Checklist (grants FY 2017-FY 2018)".

LOUISIANA  
DIVISION OF ADMINISTRATION

DIVISION OFFICES ▾ STATE EMPLOYEES ▾ VENDORS ▾ RESOURCES ▾ 🔍

GRANT MANAGEMENT

Home / Division Offices / Office of Community Development - Local Government Assistance / LCDBG Programs / Grant Management - Forms and Handbooks

OCD-LGA News  
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Forms and Information

Grant Management Forms

[Request for Payment Form \(RFP\)](#)

- [OCD's REP Review Checklist](#) - Use this form as a tool to check your RFP and invoices.

[Performance Schedule](#)  
[Monitoring Checklist \(grants FY 2019 forward\)](#)  
[Desktop Review \(grants FY 2019 forward\)](#)  
[Monitoring Checklist \(grants FY 2017-FY 2018\)](#)

**Available On-line at:**

<https://www.doa.la.gov/doa/oed-lga/lcdbg-programs/grant-management/>

# Request for Payment (RFP)

LOUISIANA CDBG/CDBG-CV REQUEST FOR PAYMENT (RFP)						
A. Name, Address, and Telephone Number of Contractor (City/Parish)					B. Date of Request	
					D. Request #	
C. Contract Number(s) (Enter all if multiple contracts issued) / Program Year / CDBG or CDBG-CV Grant Representative						
E. Federal Employer ID	F. Vendor Number		STATE USE ONLY	CV Funds Y N	Split Funding Y N	
G. Actual Delivery Date (A.D.D.) - The most recent date of delivery of services for each State fiscal year.				A.D.D. FY 1		
				A.D.D. FY 2		
<b>1. Status of LCDBG/CDBG-CV Funds</b>				Amount	State Use Only	IDIS Activity #
A. Amount Requested with this Request (Total from Line F below)				\$ 0.00		
B. LCDBG/CDBG-CV Funds Received to Date				\$ 0.00		
C. LCDBG/CDBG-CV Funds Requested but not yet Received				\$ 0.00		
D. Subtotal (Total Line A through Line C)				\$ 0.00		
E. Total Grant Amount (Amount of Contract)				\$ 0.00		
F. Remaining Balance (Subtract Line D from Line E)				\$ 0.00		
<b>2. Amount of Funds Requested by Activity</b>			A.D.D. FY 1	A.D.D. FY 2	Amount	
A. Public Works, Facilities, Site Improvements						
1. Sewer					0.00	
2. Streets					0.00	
3. Water (Potable)					0.00	
4. Other					0.00	
B. Rehabilitation					0.00	
C. Economic Development						
1. Commercial/Industrial Infrastructure Development					0.00	
2. Other					0.00	
D. Administration						
1. Pre-agreement Costs					0.00	
2. Public Facilities, Demonstrated Needs, & Economic Development					0.00	
3. Other					0.00	
E. Other					0.00	
F. Total			\$ 0.00	\$ 0.00	\$ 0.00	
<b>3. Certification</b>						
I certify that this Request for Payment has been drawn in accordance with the terms and conditions of the contract for the grant or loan and that the amount for which drawn is proper for payment to the drawer at the drawer's bank. I also certify that the data reported above is correct and that the amount of the Request for Payment is not in excess of current needs. <b>Approved and detailed invoices that equal or exceed the amount are attached.</b>						
A. Date	Signature				Name & Title	
B. Date	Signature				Name & Title	
<b>4. Approval (State Use Only)</b>						
A. Reviewed By				Date		
B. Approved By				Date		
<p><b>PAYMENTS CAN BE VERIFIED ONLINE AT: <a href="https://lagoverpvendor.doa.louisiana.gov/irj/portal">https://lagoverpvendor.doa.louisiana.gov/irj/portal</a></b></p> <p style="text-align: right;">LaGov checked: _____ Date: _____</p>						

# Request for Payment (RFP) Requirements

- *RFP Form should be completed and signed electronically using Adobe Acrobat software.*
  - Download at <https://get.adobe.com/reader/> .
- *Signer must be listed with that responsibility on the Financial Management Questionnaire.*
  - *If there is a personnel change, send a new Financial Management Questionnaire.*
- **Email** RFP forms to:
  - [OCDLGA.PaymentRequests@LA.GOV](mailto:OCDLGA.PaymentRequests@LA.GOV), along with approved invoices.

# Request for Payment (RFP) Requirements

- *RFPs must be submitted accurately and completely to our office to avoid delay.*
- *The grantee will have 48 hours to make the required corrections. Failure to meet the 48-hour deadline will result in having to start the RFP process from the beginning.*

# Request for Payment (RFP) Requirements

- *Invoices must be submitted with all Requests for Payment.*
- *Invoices must be signed, indicating approval, by the person listed with that responsibility on the Financial Management Questionnaire.*
- *Vendor must state the time period covered by the invoices.*
  - *If period covered by invoices crosses more than 1 fiscal year, there will be an A.D.D. FY 1 (thru 6/30) and FY 2 (last date covered).*
- *For professional services (2 CFR 200.459), the vendor must identify the task, the effort (in hours), and the hourly rate. This should be based on the Cost Reasonableness spreadsheet included in the professional services contract.*
- *Vendor must identify the item quantities and unit costs.*
- *Use of percentage or stage of completion is only allowed for construction contracts.*

# Request for Payment (RFP) Requirements

- If “other” money is covering part of the invoice, identify the LCDBG portion and the “other” portion.

- Example:

City funds	\$ 5,000
LCDBG funds	<u>\$ 8,000</u>
Total	\$13,000



# Request for Payment (RFP) Requirements

- *RFPs must be emailed by Wednesday at 4:30 PM in order to be considered for payment the following week.*
- *3-Day Rule: Vendors must be paid within 3 business days of funds being deposited.*

You can monitor deposits online at the Division of Administration (DOA)  
– Office of Statewide Reporting and Accounting Policy (OSRAP) website.

<https://www.doa.la.gov/doa/osrap/>

**HERE'S HOW...**

# OSRAP – Click “Vendor Payments – LaGov”

Home / Division Offices / Office of Statewide Reporting and Accounting Policy

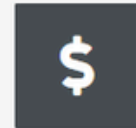
- Staff Directory
- AFR Packets
- Vendor Information
- Agency Information
- Statewide Cost Allocation
- Cash Management Improvement Act
- Policy and Procedures
- Annual Financial Report
- Memoranda
- Accounts Receivable



VENDOR INFORMATION



ANNUAL FINANCIAL  
REPORT



ACCOUNTS RECEIVABLE



AGENCY INFORMATION



CASH MANAGEMENT  
IMPROVEMENT ACT

## OFFICE OF STATEWIDE REPORTING AND ACCOUNTING POLICY

The Office of Statewide Reporting and Accounting Policy is a service and control agency established within the Division of Administration to perform the following functions: publish the Comprehensive Annual Financial Report of the state of Louisiana and other statewide reports, interim reports to the Federal government, and other reports to the Commissioner of Administration.

The Commissioner of the Division of Administration is charged with establishing a uniform system of accounting in all state agencies (LRS 39:78). He has delegated this responsibility to OSRAP. OSRAP establishes and maintains accounting policies and procedures in compliance with state and federal laws, as well as, ensuring compliance with general accounting policies, pronouncements of the Governmental Accounting Standards Boards, and other accounting standards setting boards.

# Click on “Vendor Payment Inquiry”

STATE OF LOUISIANA

**LaGov**  
Vendor  
Portal

LaGov Vendor Self Service

User \*

Password \*

(Password is case sensitive)





[Log On](#)

[Vendor Payment Inquiry](#)


[System Requirements](#)

*Note: Do Not Attempt to Log On*

Under Date Options, enter the **Date Range**. In the Selection Criteria section, enter the **Vendor Number** for the Project and the Grantee's **EIN or Federal Employer ID #** Click **“Execute Immediately.”**

Vendor Payment Listing					
<div>Save as Variant... Back Exit Cancel Help</div>					
Date Options					
Invoice Date	01/01/2021	to	12/17/2021		
Selection Criteria					
Vendor Number	310112288	to			
EIN	726001761				
** Enter Vendor Number and EIN without dashes **					
Check Number		to			
Document Number		to			
Display					
Layout					
Execute					
<div>Execute Immediately</div>					

# List of Payments

Payment Listing							
<div>Cancel</div>							
	Name	Pymt Doc	EFT/Check Date	Check No	Check Amount	Cleared Date	Status
3	 CITY OF WESTLAKE	2000807904	08/31/2021	ACH	134,024.81	09/01/2021	CLEA...
	CITY OF WESTLAKE	2000826467	10/05/2021	ACH	68,596.77	10/06/2021	CLEA...
	CITY OF WESTLAKE	2000851087	11/09/2021	ACH	8,947.71	11/10/2021	CLEA...

# Double click on any line for Additional Detail

Details

×

0310112288 CITY OF WESTLAKE 2000851087 Check No: ACH 8947.71

Payee Remittance Address

P.O BOX 700WESTLAKELA

Document Number: 5101465022Invoice Gross

Business Area: 107 DIVISION OF ADMINISTRATIONTelephone: 225-342-0700

Vendor Invoice #: 2055277611Comments: CDBG 2000552776

Line Amount:8947.71

✓

✗

🖨

# Monitoring

For monitoring purposes – we need current & accurate financial records including:

- Chart of Accounts for either a Special Revenue Fund or Capital Projects Fund
- General Ledger (Including All Transactional Detail by Account)
- Income Statement and Balance Sheet for LCDBG Funds
- All Bank Statements within timeframe of LCDBG Account Activity – from award through closeout – and copies of all checks.
- Documentation of current bonding or other insurance for individuals signing checks.
- Checkbook



# Financial Management

## Section of Grantee Handbook

- *Complete requirements and forms are in the Grantee Handbook beginning on page A-7.*

# Knowledge Check...

**How should Request For Payment (RFP) forms and invoices be submitted?**

**Submitted electronically to  
ocdlga.paymentrequests@la.gov**

**What time frame is allowed for corrections to the original RFP form?**

**48 hours**

# Contact Information

Janelle Dickey

Financial Manager

[Janelle.Dickey@la.gov](mailto:Janelle.Dickey@la.gov)

225-219-7278

Kenya Wallace

CD Financial Analyst 2

[Kenya.Wallace2@la.gov](mailto:Kenya.Wallace2@la.gov)

225-342-5741

Ashley Smith

CD Financial Analyst 1

[Ashley.Smith9@la.gov](mailto:Ashley.Smith9@la.gov)

225-342-8440



# Environmental Review Record

**Presented By:**  
**Sarah Underwood**

[illegible]

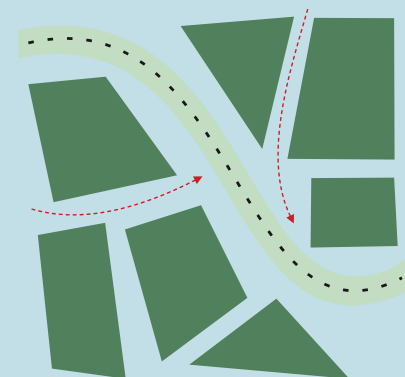
For all projects, especially economic development projects, particular attention must be given to 24 CFR Part 58.32 – Project Aggregation.

# *Program Requirements*

- All contract conditions must be cleared within **five months** of the date of the Authorization to Incur Costs letter.
- The Environmental Review Record (ERR) should be received by the State within five months of this date to ensure sufficient time for review.
- The grantee's Chief Elected Official (CEO) will assume overall responsibility for the environmental review process.
- The CEO must sign all certifications and findings.
- The ERR must be submitted to this office with original signatures (**NOT e-mailed**)
- If grant funds are used to prepare the ERR no correspondence should be dated before the Authorization to Incur Cost letter.

# *Project Description & Map*

- This should be the first step of the review process.
- The description should be detailed and include all activities that will take place in the project.
- Must include the words: “site-specific” or “not site-specific”
- Map should show the exact location(s) of the project
- The Project Description and Map will be sent with all correspondences
- Project Description will also help Grantee determine the level of review.





# *Environmental Review Clearance Levels*

## **Exempt**

- Environmental studies, project planning, and administrative costs

## **Categorically Excluded Not Subject to 58.5 – 58.35 (b)**

- Operating costs and equipment

## **Categorically Excluded Activities Subject to 58.5 – 58.35 (a)**

- Acquisition, repair, and improvements (less than 20%)

## **Activities Requiring an Environmental Assessment 58.36**

- New construction and substantial improvements (more than 20%)

## **Environmental Impact Statement – 58.37**

- Significant impact on environment

# Determination of Environmental Review Level

Must be included for all projects.

Signed, dated, project description and project map should be attached, Read selections and make sure they match the project.

## A-12: DETERMINATION OF ENVIRONMENTAL REVIEW LEVEL

Certifying Officer, NAME, TITLE, is designated as the environmental certifying officer for the PROGRAM project described below. I certify that:

Grantee: \_\_\_\_\_ email: \_\_\_\_\_ phone: \_\_\_\_\_

Grantee Address: \_\_\_\_\_

Preparer Contact: \_\_\_\_\_ email: \_\_\_\_\_ phone: \_\_\_\_\_

Project Location: \_\_\_\_\_

### Project Description:

*(The attached project description is a clear, concise overview of the project that enables the reader to understand the scale, scope, and extent of the project, and supports the reasons for the determination of level of environmental review. The description should include information on all proposed activities (listed by funding source), describe the existing environment, area served, location, linear feet of pipe to be installed, number of new service connections, etc. The target area must be described by street name, highway name, or numbers for each street serving as a boundary for the project area being environmentally cleared. A legal description of the area being cleared may be included but is not required.)*

Project is: ☒ Site Specific ☐ Not Site Specific

**Project Map:** Attach a map clearly delineating the project area and location of project activities.

### Which of the following applies to the project:

- |   |   |
|---|---|
| <input type="checkbox"/> Ground Disturbance | <input type="checkbox"/> Substantial Rehabilitation (more than 20%) |
| <input type="checkbox"/> Demolition         | <input type="checkbox"/> None of the Above                          |
| <input type="checkbox"/> New Construction   |   |

### Level of Environmental Review:

- |   |   |
|---|---|
| <input type="checkbox"/> Exempt                                   | <input type="checkbox"/> Categorically Exempt subject to 58.5 |
| <input type="checkbox"/> Categorically Exempt not subject to 58.5 | <input type="checkbox"/> Environmental Assessment             |

\_\_\_\_\_  
Certifying Officer Signature  
(TYPED NAME, TITLE)

\_\_\_\_\_  
Date

# HUD Form based on the level of Review

- The ERR Handbook includes links to all needed Forms based on the Review level and Worksheets. Forms may also be found on Environmental Review - HUD Exchange
- The Compliance Determination section should state what was included in the response from the agencies; documentation of both copies of the letters and dates that match the letter; if a map is referenced the date on the map and map number should be included.
- The HUD worksheet it will let you know depending on responses if box yes or no should be answered to “Are formal compliance steps or mitigation required?”

# Knowledge Check...

**The ERR should be received by the state within?**

**4 Months of the AIC Letter**

**What words must be included in the project description?**

**“site specific” or  
“non site specific”**

# Worksheets for Compliance Areas

- Worksheet must be completed and submitted with all supporting documentation because the worksheet directs the Grantee to know what should be put on the Environmental Assessment Form.
- If the compliance area is listed on the HUD form for that level of review a worksheet should be completed and all supporting documentation should be attached.
- Partner Worksheets should not be used!!

**THE ERR IS NOT COMPLETE WITHOUT THE WORKSHEETS AND SUPPORTING DOCUMENTATION.**

# Historical Properties

- The letter sent to SHPO and the response letter received from SHPO should both be included and referenced on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
- If tribes should be contacted, the list from the TDAT should be included as well as all correspondences to and from the listed tribes for that area. If the tribes/SHPO request something the wording should be included in the compliance finding section. <https://egis.hud.gov/tdat/>
- All letters and dates should be included on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
- If a Cultural Resource Survey is requested by a tribe consult with OCD on a timeline and extension request.



# Floodplain and Wetland Management

- **Floodplain Management** - CISA website will be used to verify the map panel and the zones that should be in the project area. (Reference the FFRMS panel number and date of the map on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column). If the project is located in a 100-year, 500-year or floodway then an 8-step process must be completed. CISA Floodplain Map: <https://floodstandard.climate.gov/>
- **Wetland Management**- Check the USFSW map and make sure it's the correct area. If Wetlands are in the project area then the 8-Step process will need to be completed. (Reference Wetlands Inventory Map on HUD Exchange Summary and the Environmental Assessment form Compliance Determination column).  
<https://www.fws.gov/program/national-wetlands-inventory>

# 8-Step Process

## General Overview:

- Step 1: Reviewed the site and ensured the project is needed
- Step 2: Early Publication notice w/ 15-day comment period
- Step 3: Can the project be avoided? List reasons why it can not be avoided.
- Step 4: Permanent adverse impacts?
- Step 5: Require minimization of project impacts
- Step 6: Re-evaluation of alternatives
- Step 7: Final notice Publication w/ 7-day comment period
- Step 8: Proceed to implement project after comment period

If the 8-step process is needed for both Wetlands and Floodplains the Grantee can include both findings in one 8-step review, but all findings must be mentioned. Also, make sure that the findings of the 8-step process are included and the 8-step process is mentioned in the compliance determination column and the formal compliance or mitigation measures question is marked “yes”.



# Coastal Zone Map and Coastal Barrier Resource Management

- Coastal Zone map for Louisiana should be included and referenced on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column as Coastal Zone Map.
  - <https://www.fws.gov/ecological-services/habitat-conservation/cbra/maps/a/LA.pdf>
- Coastal Barrier Resource map should be included and referenced in the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
  - <https://www.fws.gov/ecological-services/habitat-conservation/cbra/maps/a/LA.pdf>

# Sole Source Aquifer

- Correspondence from Omar Martinez, EPA, should be included in the ERR and referenced on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
- If the project is within a Sole Source Aquifer, a MOU (Memorandum of Understanding) must be included in the ERR and referenced on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
- Sole Source Aquifer Map can be found here:  
<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

# Wild and Scenic Rivers

- The Grantee should include a map that shows the distance from the Sabine River.
- The list of Rivers from the National Parks Service that are currently being studied should also be included.  
<https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>  
<https://www.nps.gov/subjects/rivers/louisiana.htm>
- Both the list and the map should be mentioned on the HUD Exchange Summary and Compliance Determination column.

# Airport Hazards

- Must include 2 separate maps (one for civil airports and one for military airfields)
- Both maps must show the distance from the site to the airfield.
- <https://www.airnav.com/> or google maps

# Endangered Species

- A USFSW Report is required from <https://www.fws.gov/southeast/lafayette/project-review/>
- If the report yields any findings, consultation is required with the agency and a **memo** is required from the CEO.
- All letters and memos should be referenced on the HUD Exchange Summary and Compliance Determination column and include the dates as well as the findings.

# Farmland Protection

Should include one of the following for documentation:

1. A determination that the project does not include any activities, including new construction, acquisition of undeveloped land, or conversion, that could potentially convert one land use to another
2. Evidence that the exemption applies, including all applicable maps
3. Evidence supporting the determination that “Important Farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the FPPA does not occur on the project site
4. Documentation of all correspondence with NRCS, including the completed AD-1006 and a description of the consideration of alternatives and means to avoid impacts to Important Farmland

# Other Compliance Areas

- **Environmental Justice** – LMI Map that shows concentrated areas should be included. There is no HUD Exchange form.
- **Air Quality** – non attainment list for Louisiana should be included and referenced on the HUD Exchange Summary and the Environmental Assessment form Compliance Determination column.
- **Noise Abatement and Control** – refers to the project description in the compliance determination section and the HUD Exchange Summary.
- **Explosives and Flammables** – refers to project description in the compliance determination section and the HUD Exchange Summary.
- **Contamination and toxic substances** – NETROnline search included and referenced in compliance determination section and the HUD Exchange Summary. Please complete search in NETROnline:  
<https://environmental.netronline.com/>

*All clearance projects must submit asbestos testing for each project area. This has to be submitted in order to complete the ERR process.*

# Revisions

- After the initial review – If revisions are needed the reviewer will send out a letter requesting revisions. The Grantee should respond in a timely manner to avoid delays and penalties. A second revision letter may be needed if all corrections are not correct.
- Once the ERR is complete and no other revisions are needed the reviewer will send a letter giving permission to publish or clearance depending on the level of review.



# Knowledge Check...

**Who should you contact regarding Historic Properties?**

**SHPO**

**How many airport maps are needed?**

**2: both military and civil airport maps**

# Request the Release of Funds

- After the ERR and all revisions are reviewed, OCD will send a Permission to Publish letter.
- After the Permission to Publish letter is received, the Grantee should submit a Combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request the Release of Funds (NOI/RROF) within 30 days.
- All required permits, mitigation measures, and the Eight-Step Process must be included in the notices.
- The Request for Release of Funds must be signed by the CEO after the end of the local public comment period.
- The ERR reviewer will count **15** days from the date the RROF is received for the state comment period. The day after the 15th day the reviewer will prepare the ERR clearance letter.

# Activities Requiring an Environmental Assessment – 58.36

- Comment Periods - Combined Notice**

	Publication	Posted
“Combined Notice” Date	06/04/xx (15 days)	06/04/xx (18 days)
Date of “Request for Release of Funds and Certification”	06/20/xx	06/23/xx
Date ERR and request for funds mailed to State	06/20/xx	06/23/xx
ERR received by State	06/22/xx	06/25/xx
State’s 15-day Public Comment Period	06/23/xx to 07/07/xx	06/26/xx to 07/10/xx

# Categorical Exclusions Subject To 58.5 – 58.35 (a)

- **Comment Periods - Notice of Intent to Request Release of Funds**

	Publication	Posted
Notice of Intent Date	06/04/XX (7 days)	06/04/xx (10 days)
Date of “Request for Release of Funds and Certification”	06/12/xx	06/15/xx
Date ERR and request for funds mailed to State	06/12/xx	06/15/xx
ERR received by State	06/14/xx	06/17/xx
State’s 15-day Public Comment Period	06/15/xx to 06/29/xx	06/18/xx to 07/02/xx

# ERR Clearance

- If the entity is determined EXEMPT after a review of documents, then the reviewer will issue a clearance and the Permission to Publish is not needed.
- All activities must be environmentally cleared including those funded by private funds.
- Until the State has approved the recipient's Request for Release of Funds, neither a grantee nor any participant, including public or private non-profit or for-profit entities or any of their contractors, may commit LCDBG/HUD funds or private funds or undertake an activity or project. (24 CFR Part 58.22)
- This regulation is triggered when the grantee's application is submitted to the State.

# Revised Environmental Review Records

- If the project site/location or scope of work changes after clearance, then the ERR must be amended.
- All compliance areas must be reconsidered and all relevant agencies contacted.
- The Re-Evaluation of an Environmental Review (form A-20 in the Grantee Handbook) should be completed and submitted to OCD.
- OCD will review all changes once submitted and issue a new clearance.
- For Environmental Assessment projects:
  - a. No change in determinations - only have to submit revised ERR.
  - b. Change in determinations or new activity or location added – post/publish new FONSI (finding of no significant impact) notice.

# Common Errors

- Not including all of the required maps or not including enough information on the maps.
- Not completing all forms
- Not following requests from tribes.
- Not signing and dating forms that require signatures.
- Not discussing alternatives in the Eight-Step Process.
- Missing documentation to support determinations.

**Make sure you review the entire ERR before turning it in! This will minimize errors.**



## *Contact Information*



For questions, please contact:  
Fenishia Favorite- [fenishia.favorite@la.gov](mailto:fenishia.favorite@la.gov)  
(225)342-5884

Staff that reviews Environmental Review Record:

Kristi Kron- [kristi.kron2@la.gov](mailto:kristi.kron2@la.gov)  
(225)342-7251

Liza Bergeron- [liza.bergeron2@la.gov](mailto:liza.bergeron2@la.gov)  
(225)342-2800

Sarah Underwood- [sarah.underwood@la.gov](mailto:sarah.underwood@la.gov)  
(225)219-0801

Teresa Holley- [teresa.holley@la.gov](mailto:teresa.holley@la.gov)  
(225)342-7413

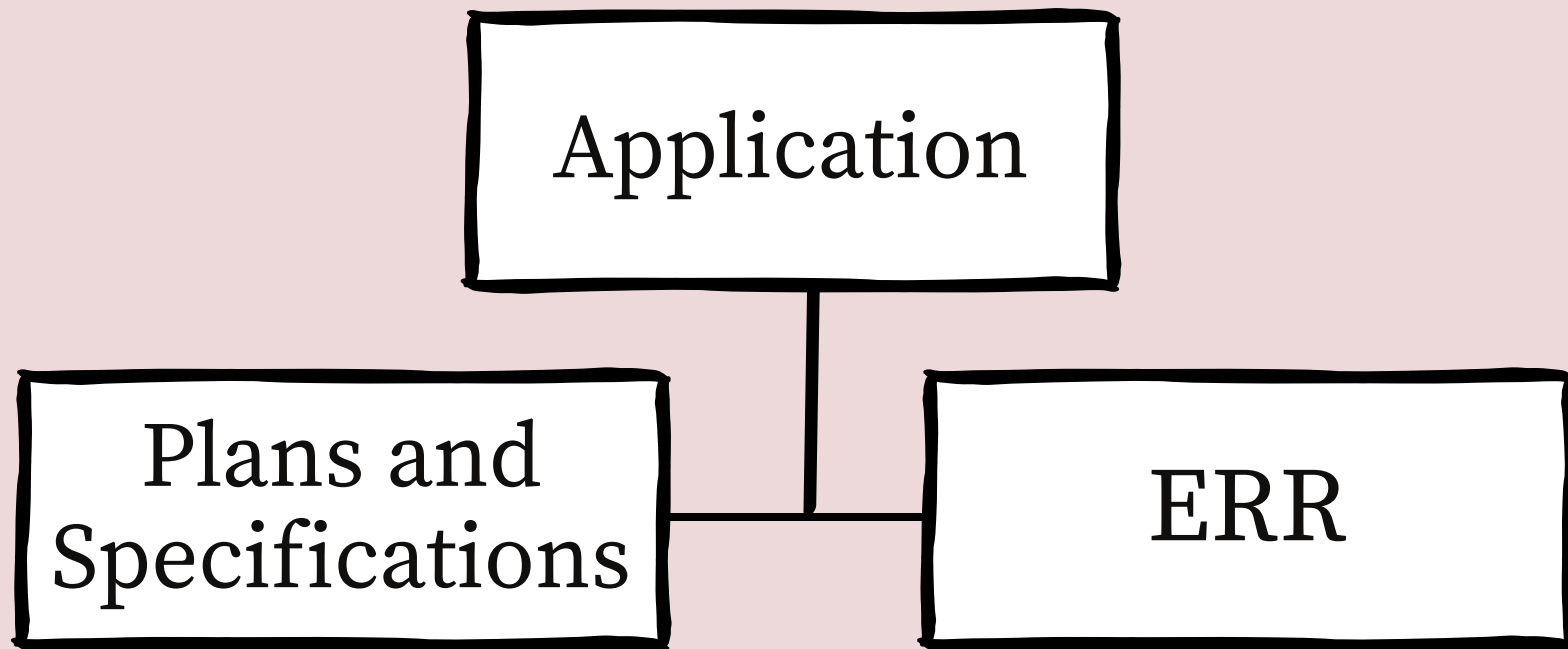




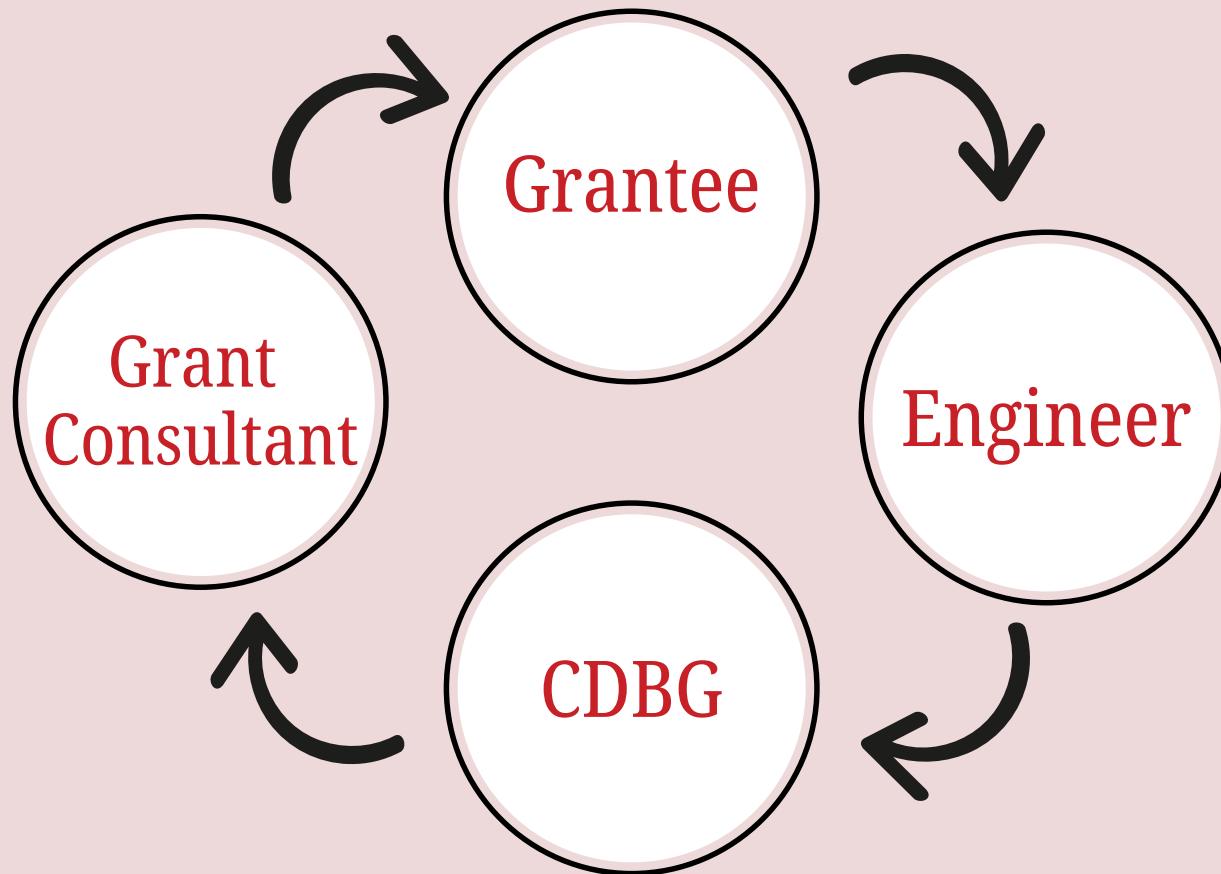
# Engineering

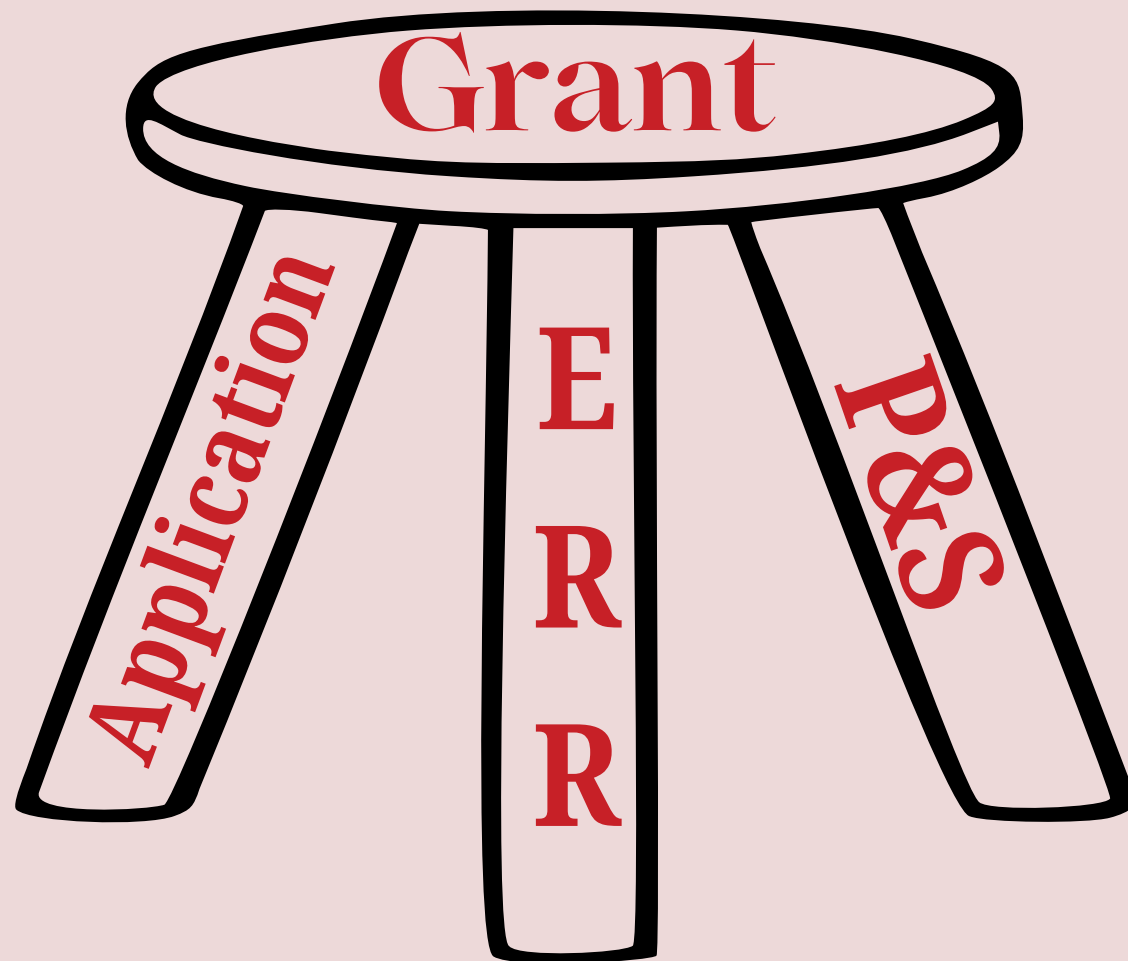
Presented By: Jeff Tessier

## *Grant: 3 Parts*



# *Communication!*





Plans



```
graph TD; A[Plans] --> B[Specifications]; B --> C["Cost Estimate  
(=Bid Form)"]; C --> D["Transmittal Letters  
LDH & Permitting"]; D --> E[Addendums]
```

Specifications

Cost Estimate  
(=Bid Form)

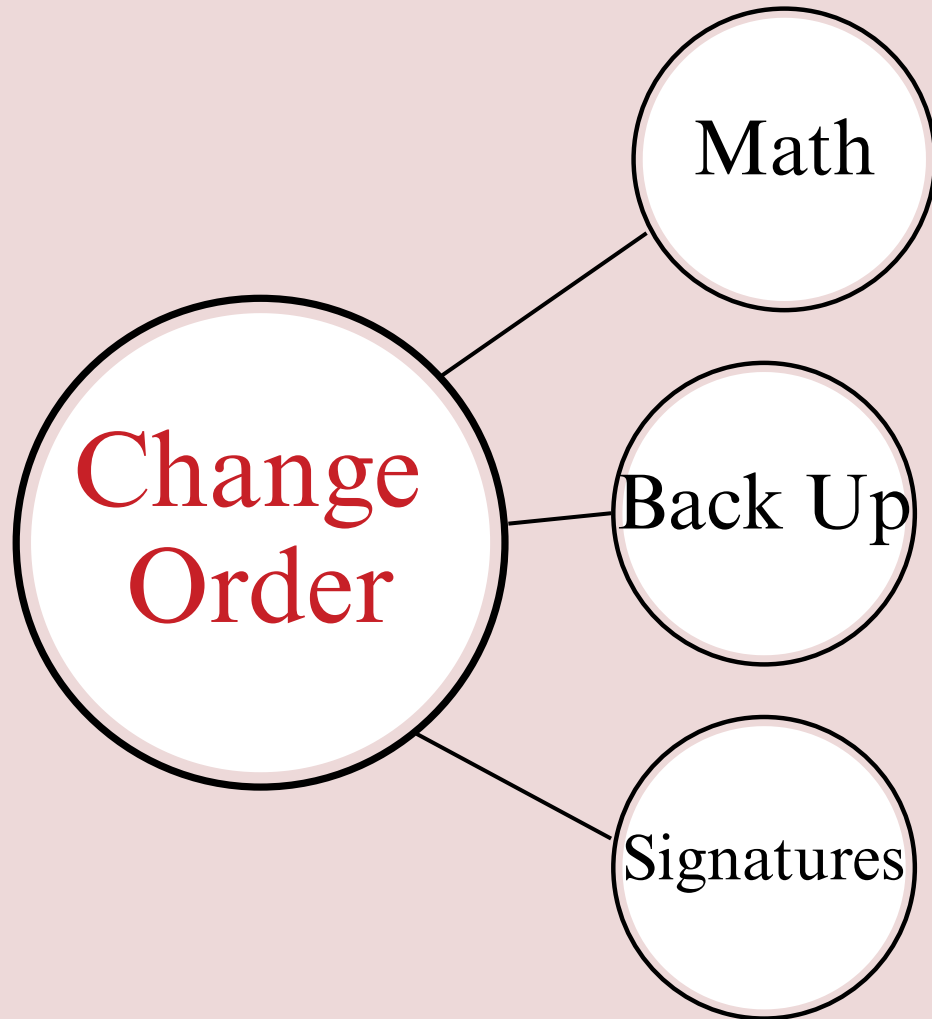
Transmittal Letters  
LDH & Permitting

Addendums

# *Authorization to Advertise for Bids*

The Authorization to Advertise for Bids will come when the P&S and the ERR have been approved and all other contract conditions are met.

The advertisement to solicit bids for the construction contract will be published within 30 days of the State's "authorization to advertise for bids."



- The engineer & the contractor sign and date the C.O.
- Submit the C.O. to me by email or mail.
- I approve it and email it back to you, this is for your records.
- Get the Mayor or Parish President to approve and date the Change Order. You keep and distribute as many copies as you need.
- Submit to LCDBG one copy with the engineers, contractors and Mayor or Parish President signatures.





Change Orders

Addendums

RPR Certifications

\*Anything Time Sensitive\*



Plans and Specs, and Revisions

\*Large Attachments\*

*For the Community Development Block Grant (CDBG) program:*

We require a Resident Project Representative (RPR) for the project.

We also need to qualify the Resident Project Representative.

To qualify a Resident Project Representative, submit the certification form and resume of the RPR.

If you have worked with CDBG before and have qualified your RPR then you do not need to do anything.

When the grant is monitored, the monitoring team will check to see that whoever is signing the inspection reports is a qualified RPR.

**A-44: QUALIFICATION CERTIFICATION FOR RESIDENT PROJECT REPRESENTATIVE**

**QUALIFICATION CERTIFICATION  
FOR  
RESIDENT PROJECT REPRESENTATIVE**  
*LOUISIANA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM*

*(To be filled out by the Architect/Engineer – if more than one Resident Project Representative is seeking to be qualified per Engineering Firm, fill out one Qualification Certification for each)*

**NOTE: This Qualification Certification and a copy of the Resident Project Representative's current resume showing qualifications and work history must be submitted to the Office of Community Development and approval granted before construction begins.**

*Architect/Engineering Firm:* \_\_\_\_\_

*Name of Resident Project Representative:* \_\_\_\_\_

**\*\*\*\*\* CERTIFICATION \*\*\*\*\***

*This is to certify that the person listed above has the qualifications and abilities to perform the appropriate duties and responsibilities of the Resident Project Representative on the proposed LCDBG funded construction project. This individual understands the duties, responsibilities, and authority of the Resident Project Representative; has a good working knowledge of the types of construction materials and practices for this particular project; and will be under my direct supervision for the duration of the construction of the project.*

**(For State Use Only)  
A P P R O V E D**

\_\_\_\_\_  
**CDBG**

\_\_\_\_\_  
*Signature of Architect/Engineer*

\_\_\_\_\_  
*Typed or printed name*

\_\_\_\_\_  
*Date*



## *Contact Information*



Jeff Tessier

email: [Jefferson.Tessier@la.gov](mailto:Jefferson.Tessier@la.gov)

phone: (225)342-3268



# Civil Rights

**Grantee's Required Actions for Compliance**

**Presented by:  
Denease McGee**

# Civil Rights: Compliance Areas

- Equal Employment Opportunities (EEO) Requirements
- Minority business Enterprise (MBE)
- Fair Housing Requirements
- Violence Against Women Act
- Section 504 Requirements
- Summary of Previous Actions Taken/Transition Plan
- TDD
- Language Access Plan- Limited English Proficiency
- Employee data
- Section 3
- Definition
- Goals
- Requirements

# Civil Rights

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968
- Section 109 of the Housing and Community Development Act of 1974
- Age Discrimination Act of 1975
- Section 3 of the Housing and Urban Development Act of 1968
- Section 504 of the Rehabilitation Act of 1973



# Equal Employment

- Personnel policies should clearly outline hiring, training, and promotional procedures. The local government should develop an employment policy that contains a non-discrimination clause assuring that all persons will be treated equally in employment opportunities.
- An Equal Employment Opportunity poster must be displayed in a prominent place in the Grantee's office

# **MBE: Regulations**

**24 CFR 200-321 requires that Grantees take affirmative action to contract with small and minority-owned firms or women's business enterprises in the administration of the LCDBG project.**

# Examples of Affirmative Action Steps

Adding qualified small and minority-owned enterprises and women's business enterprises to solicitation lists and assuring they are solicited whenever they are potential sources.

Dividing total requirements into smaller tasks or quantities to permit maximum participation by small and minority-owned enterprises and women's business enterprises when economically feasible.

Establishing delivery schedules that will encourage participation by small and minority-owned businesses and women's business enterprises where the requirements permit.

Using the services and assistance of the Small Business Administration as necessary.

Requiring the prime contractor to take the above affirmative steps if any subcontracts are to be let.

# Grantee Requirements for Compliance:

- Annual submission of the Contract and Subcontract Activity Form for construction and non-construction contracts and subcontracts.
- This report is due by September 30<sup>th</sup> each year.
- Grantee will only report new contracts which have been awarded from October 1<sup>st</sup> through September 30<sup>th</sup> each year.
- Contracts that have not previously been reported.
- Grantee is required to submit a yearly report during active grant years
  - *What if all contracts were reported, do we still need to complete the report?*
  - YES!

\* October 1, 2024 – September 30, 2025\*

**If the grant closes prior to the deadline, a report must be submitted with closeout documents if and only if there is a contract to report that was not previously reported.**

## )

OMB Approval No.: 2535-0117 (exp. 1/31/2013)

Executive Order 12421 dated July 14, 1983, directs the Minority Business Development Plans shall be developed by each Federal Agency and that these annual plans shall establish minority business development objectives. The information is used by HUD to monitor and evaluate MBE activities against the total program activity and the designated minority business enterprise (MBE) goals. The Department requires the information to provide guidance and oversight for programs for the development of minority business enterprise concerning Minority Business Development. If the information is not collected HUD would not be able to establish meaningful MBE goals nor evaluate MBE performance against these goals. While no assurances of confidentiality is pledged to respondents, HUD generally discloses this data only in response to a Freedom of Information request.

1. Grantee/Project Owner/Developer/Sponsor/Builder/Agency

PHA

IHA

☐ Oct. 1 - Sept. 30 (Annual-FY)

See explanation of codes at bottom of page.

Use a separate sheet for each program code.

7c: Type of Trade Codes:		7d: Racial/Ethnic Codes:	

**7d: Racial/Ethnic Codes:**

# Fair Housing

**The Federal Fair Housing Law provides that “...no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate-related transactions including lenders, builders, and homeowners’ insurance companies” (24 CFR 100.5).**

# Grantee Requirements for Compliance

- Each Grantee shall certify that there have been no findings made by or open complaints with the HUD FHEO or Louisiana Attorney General.
- The Grantee shall notify OCD at any time during the grant if a complaint is filed.

# Fair Housing Activity



LCDBG Grantees are required to further fair housing efforts by

1. adopting a Fair Housing Resolution or Ordinance,
2. ensuring the placement of fair housing posters in conspicuous locations of public buildings, including municipal offices, and



# Violence Against Women Act (VAWA)

The Violence Against Women Act (VAWA) Reauthorization of 2022, effective October 1, 2022, includes a new requirement for U.S. Department of Housing and Urban Development (HUD) recipients to support an individual's right to seek law enforcement or emergency assistance. All CDBG grantees are required to report on the existence of laws or policies adopted that impose penalties based on requests for law enforcement or emergency assistance or based on criminal activity that occurred at a covered property.

# Examples of Laws that violate VAWA

- Nuisance property ordinances that include fines for an “excessive” number of calls for emergency or ambulance services and/or incidents of domestic violence.
- Laws that lack exceptions for cases where the resident or tenant is a survivor of domestic violence or another crime, or for calls for emergency assistance by persons with disabilities.
- Laws that do not specify domestic violence as a nuisance but still penalize survivors due to having a broad definition of “nuisance activities” (e.g., disturbing the peace, excessive noise, disorderly conduct, or “excessive” calls to emergency services).
- Laws that require or encourage denial of an applicant with any criminal record, including arrests or misdemeanors.

# VAWA Certification

- All CDBG Grantees must review all ordinances, local regulations, and policies adopted by the local government and currently in effect and certify compliance with the Violence Against Women Reauthorization Act of 2022. (Exhibit A-27)
- If any policies are identified they must be re-evaluated and addressed within the grant agreement period. A summary of efforts to evaluate alternative policies that do not impede the Right to Report Crime and Emergencies from one's home and a timeline for action on one or more alternatives must be submitted.
- The summary and timeline for implementation of alternative policies must be submitted with the certification to OCD-LGA for review and approval to clear contract conditions.

## A-27: VIOLENCE AGAINST WOMEN ACT (VAWA) CERTIFICATION

I certify that the \_\_\_\_\_ is in compliance with the Violence Against Women Reauthorization Act of 2022. The \_\_\_\_\_ has reviewed its ordinances, local regulations, and policies (collectively referred to as "policies") adopted by the \_\_\_\_\_ and currently in effect, with the following results:

☐ No policies were identified that contain any financial or regulatory penalty imposed on property owners or residents as a result of any use of emergency services. Or

☐ The following policies were identified that may contain financial or regulatory penalties imposed on property owners or residents as a result of any use of emergency services:

Policy: \_\_\_\_\_

Purpose of policy: \_\_\_\_\_

Financial or regulatory penalty (or potential penalty): \_\_\_\_\_

The Grant Recipient commits to re-evaluating and addressing any policies identified above as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The \_\_\_\_\_ understands that any policies identified above must be re-evaluated and addressed within the grant agreement period.

- A summary of efforts to evaluate alternative policies that do not impede the Right to Report Crime and Emergencies from One's Home and a timeline for action on one or more alternatives must be submitted prior to the release of grant funds for construction.

- The timeline for implementation of alternative policies is subject to OCD-LGA review and approval; grant funds will be placed on hold if the \_\_\_\_\_ fails to comply with the requirements of this VAWA certification.

\_\_\_\_\_  
Chief Elected Official Name

\_\_\_\_\_  
Date policy review completed

\_\_\_\_\_  
Chief Elected Official Signature

# Section 504

**Section 504 provides that "no otherwise qualified individual with handicaps in the United States shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."**

# Grantee Requirements for Compliance

- Each Grantee shall submit an assurance to the Office of Community Development that the LCDBG program will be operated in compliance with Section 504 requirements (24 CFR 8.50(a)).
- This assurance obligates the Grantee for the period during which federal financial assistance is extended. This assurance must be submitted prior to receipt of the executed contract with the State.

# Requirements for Grantees Employing 15 or More Persons



# Grantee Requirements for Compliance:

- A responsible employee must be designated to coordinate the community's efforts to comply with Section 504.
- The community must adopt by resolution grievance procedures that incorporates appropriate due process standards and that provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part.



# Grantee Requirements for Compliance

- The Grantee shall take appropriate initial and continuing steps to notify “participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the Grantee” that it does not discriminate on the basis of disability in violation of this part.
- The notification shall also include an identification of the responsible employee designated above.

# Grantee Requirements for Compliance

- A Grantee shall make the initial notification required by this paragraph within 90 days of receipt of the executed contract with the State for each new grant.
- Methods of initial and continuing notification may include the posting of notices, publication in newspapers and magazines, placement of notices in recipients' publications, and distribution of memoranda or other written communications.

# Grantee Requirements for Compliance

- The Grantee must maintain a file, make available for public inspection, and provide the following to the responsible civil rights official upon request:
  - a. a list of the interested persons consulted;
  - b. a description of areas examined in the self-evaluation and any problems identified;
  - c. a description of any modifications made and/or any remedial steps taken
- Grantee must maintain data for the State showing the extent to which individuals with disabilities are beneficiaries of federally assisted programs

# **Self-Evaluation & Transition Plan**

# Grantee Requirements for Compliance

- Each Grantee shall have completed a self-evaluation of current policies and practices with respect to communications, employment, and program/physical accessibility to determine whether, in whole or in part, they do not or may not meet the requirements of being accessible to individuals with disabilities. The self-evaluation will have been completed within six months of receipt of any grant award after July 1988.
- The self-evaluation shall designate all buildings and structures as “new” or “existing,” depending on whether the building was constructed or altered after July 1988 (24 CFR 8.51(a)).
- The self-evaluation shall determine whether buildings and structures that house programs and services for the public can be approached, entered, and used by persons with disabilities

# Grantee Requirements for Compliance

At a minimum, these items should be addressed in the self-evaluation:

- Parking – Spaces, Curbs, Ramps;
- Routes and Pathways – Slopes, Levels, Ramps,
- Notices; Entrance Ways – Widths and Heights;
- Interiors – Door Grasp, Pressure, Pathways,
- Elevators; Service – Counter Heights,
- Notices; and Auxiliary Services – Telephones, Restrooms, Drinking Fountains.

# Grantee Requirements for Compliance

Each Grantee shall modify any policies and practices that do not meet the requirements for program accessibility (24 CFR 8.51).

Compliance with 504 does not necessarily require a Grantee to make each of its existing facilities accessible to and usable by individuals with disabilities.

# Visual and Hearing Impairments



# Grantee Requirements for Compliance

- Each Grantee must ensure that members of the population eligible to be served or likely to be affected directly by a federally assisted program who have visual or hearing impairments are provided with the information necessary to understand and participate in the program.
- Methods for ensuring participation include, but are not limited to:
  - Qualified sign language and oral interpreters readers or the use of taped and Braille materials.

# Grantee Requirements for Compliance

- The regulation requires that each Grantee must have available a TDD or equally effective method for communicating with hearing impaired persons.
- Louisiana has an approved relay service that may be utilized.
- The Grantee must have a policy indicating the use of the relay system by the Grantee and publish the telephone numbers in the newspaper within six months of the date of the “Authorization to Incur Costs” letter.

**\*NEW FOR FY 2025: THIS IS NOW A CONTRACT CONDITION\***

# Grantee Requirements for Compliance

- The numbers are: TDD Users 1-800-846-5277, and Voice Users 1-800-947-5277. This service is free of charge.
- The number “711” has been approved by the Federal Communications Commission (FCC) for use in contacting the relay service. This number works from both TDD and voice telephones and while it is applicable in most states, Grantees are still required to list the “800” numbers presented above.

# Limited English Proficiency: Language Access Plan

All Grantees will be required to complete and adopt a Language Access Plan (LAP) for Limited English Proficiency (LEP) Persons, as required by Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 which states that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency.

# Grantee Requirements for Compliance

- In preparing this LAP, Grantees must conduct a four-factor analysis
- This plan must be adopted within one year of the “Authorization to Incur Costs” letter and reviewed/updated on an annual basis to ensure continued responsiveness to community needs.
- Depending upon the size of a particular language group, translation of “vital” documents may become necessary.

# Grantee Requirements for Compliance

- The Office of Community Development's LAP is found in exhibit A-31, which can be used as a sample.
- The LEP website [www.lep.gov](http://www.lep.gov) also has resources available to help formulate the LEP, including links to I-Speak Cards. More information can be found at [www.hud.gov](http://www.hud.gov)
- The Grantee should utilize Census.gov to find the data at the Parish or the City/Town/Village level at <https://data.census.gov/cedsci/table?q=S1601&tid=ACST1Y2019.S1601>

### III. Four-factor Analysis

The following four-factor analysis will serve as the guide for determining which, if any, language assistance measures the OCD will undertake to provide access to the covered programs for LEP persons. Additionally, all future CDBG fund recipients will be required to use the same four-factor analysis prior to the release of funds.

- A. Number or proportion of LEP persons eligible to be served or likely to be encountered by the OCD or its federally funded programs. Per the 2013-2017 American Community Survey 5-Year estimates, Louisiana's population is 4,353,030.

Approximately 91.7% of Louisiana's population speaks English, and 8.3% speak a language other than English. 3.6% of Louisiana's population speaks Spanish or Spanish Creole, and 3.0% speak other Indo-European languages and 1.3% speak Asian and Pacific Island Languages. No other ethnicity has a sizeable limited English proficiency.

The table below shows the LEP percentages for each of the above mentioned languages.

Language 1 (name)	Population That Speaks a Language Other Than English	LEP Number	LEP % of Total Louisiana Population
Spanish/Spanish Creole	161,384	73,584	1.69%
Other Indo-European	129,835	22,791	.52%
Asian and Pacific Island	55,163	27,547	.63%

# Knowledge Check...

Do you have to adopt a Language Access Plan?

**Yes!**

How many days do you have to make the initial notice of compliance for 504?

**90 Days!**



# Section 3

- **Section 3 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701u and 24 CFR Part 75] is HUD's legislative directive for providing preference to low- and very low-income residents of the local community (regardless of race or gender), and the businesses that substantially employ these persons, for new employment, training, and contracting opportunities resulting from HUD-funded projects.**

# Grantee Requirements for Compliance

- Each Grantee must ensure that members of the population eligible to be served or likely to be affected directly by a federally assisted program who have visual or hearing impairments are provided with the information necessary to understand and participate in the program.
- Methods for ensuring participation include, but are not limited to:
- Qualified sign language and oral interpreters readers or the use of taped and Braille materials.

# Definitions

Labor hours means the number of paid hours worked by persons on a Section 3 project or by persons employed with funds that include public housing financial assistance.

Section 3 business concern means:

- A business concern meeting at least one of the following criteria, documented within the last six-month period:
  - It is at least 51 percent owned and controlled by low- or very low-income persons;
  - Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
  - It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
- The status of a Section 3 business concern shall not be negatively affected by a prior arrest or conviction of its owner(s) or employees.
- Nothing in this part shall be construed to require the contracting or subcontracting of a Section 3 business concern. Section 3 business concerns are not exempt from meeting the specifications of the contract.

# Definitions

## Section 3 worker means:

- Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
    - The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
    - The worker is employed by a Section 3 business concern.
    - The worker is a YouthBuild participant.
  - The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.
  - Nothing in this part shall be construed to require the employment of someone who meets this definition of a Section 3 worker.
- \*\*Section 3 workers are not exempt from meeting the qualifications of the position to be filled.**

# Definitions

Targeted Section 3 worker: a Section 3 worker who:

- Is employed by a Section 3 business concern; or
- Currently fits or when hired fit at least one of the following categories, as documented within the past five years:
  - Living within the service area or the neighborhood of the project, as defined in [24 CFR § 75.5](#); or
  - A YouthBuild participant.

# Meeting Goals

- “Service Area” or the “ neighborhood of the project” means an area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of the Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census
- Residing in the Section 3 service areas is one of the criteria for a Section 3 targeted worker.
- Section 3 service area is NOT the same as low-mod area, which pertains to meeting a national objective.

# Meeting Goals

## Minimum Numerical Goals

- Twenty-five (25) percent or more of the total number of labor hours worked by all workers on a Section 3 project are Section 3 workers.
- $\frac{\text{Section 3 Worker Labor Hours}}{\text{Total Labor Hours}} =$
- Five (5) percent or more of the total number of labor hours worked by all workers on a Section 3 project are Targeted Section 3 workers, as defined at § 75.21.
- $\frac{\text{Targeted Section 3 Labor Hours}}{\text{Total Labor Hours}} =$



*Total Hours  
(100%)*

*Sec. 3 Worker  
Hours (25%)*

*Targeted Sec. 3  
Worker  
Hours (5%)*



# Professional Service Labor Hours

- Non-construction services that require an advanced degree or professional licensing are excluded from Section 3 Final Rule.

BUT.....

- Grantee may count any work performed by a professional services Section 3 or Targeted Section 3 worker as Section 3 labor hours.
- This is done by adding the hours to the numerator in the equation.

**DO NOT COUNT PROFESSIONAL SERVICES AS PART OF  
THE TOTAL LABOR HOURS!**

$$\frac{\text{Section 3 Worker Labor Hours}}{\text{Total Labor Hours}} = 25\%$$

$$\frac{\text{Targeted Section 3 Labor Hours}}{\text{Total Labor Hours}} = 5\%$$

# Grantee Requirements for Compliance

- Grantees must document their efforts to comply with Section 3 through maintenance of a “good faith efforts” file. It should contain memoranda, correspondence, advertisements, etc., illustrating the Grantee’s and the contractor’s attempts to reach eligible persons and businesses. Documentation should support attempts to comply with Section 3.
- Normal Advertising is not enough!
  - Additional guidance (24 CFR Part 75.13.)

# Grantee Requirements for Compliance

## Failure to Meet Goals

- Documentation must be maintained as to the actions taken by each in order to attain the goals and any impediments encountered.
- This documentation will be reviewed when the Grantee is monitored.
- Sanctions for noncompliance with Section 3 include debarment, suspension, and limited denial of participation in HUD programs.

# Grantee Requirements for Compliance

- Other economic opportunities to train and employ Section 3 residents include, but need not be limited to, use of “upward mobility,” “bridge,” and trainee positions to fill vacancies and hiring Section 3 residents in part-time positions.
- These “other” opportunities, if provided, may be viewed by HUD as an effort to comply with Section 3 should a challenge be issued by a Section 3 resident or business concern that either the Grantee or contractor is not following Section 3 requirements.

# **Contractor Requirements**

# Grantee Requirements for Compliance

- Once a contract has been awarded to a contractor, each contractor must complete the required documents in the Contractors Documents Guide Exhibit D-2:
- Section 3 Clause
- Section 3 Statement of Assurances
- \*Contractor/Subcontractor Project Workforce Report (D-3)
- Section 3 Worker/Targeted Worker Certification (D-6)
- Section 3 Business Certification (D-7)
- Section 3 Final Labor Hours Compliance Report (D-5)
- Subcontractor Utilization Breakdown (D-4)

# Grantee Requirements for Compliance

- The Grantee should discuss these requirements as a separate item at the PRE-CONSTRUCTION CONFERENCE or whatever other means the Grantee utilizes to notify the prime contractor(s) of his/her responsibilities.
- When CDBG (and other HUD funding) to the project exceeds \$200,000, the Section 3 Assurances (included in Exhibit D-2), the Project Workforce Report (Exhibit D-3), the Subcontractor Utilization Report (Exhibit D-4) must be completed by the prime and all subcontractors prior to receiving CDBG funds.



## SECTION 3 CLAUSE

*(To be included in all contracts and subcontracts)*

All Section 3 covered contracts shall include the following clause (referred to as the Section 3 Clause).

- A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that economic opportunities, most importantly employment, generated by certain HUD financial assistance shall be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing or residents of the community in which the Federal assistance is spent.
- B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 75, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 75 regulations.
- C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.
- D. The contractor agrees to engage in qualitative efforts including but not limited to:
  - a. Engaging in outreach efforts to generate job applicants who are Targeted Section 3 Workers.
  - b. Providing training or apprenticeship opportunities.
  - c. Providing or referring Section 3 Workers to services supporting work readiness and retention (e.g., work readiness activities, interview clothing, test fees, transportation, childcare).
  - d. Engaging in outreach efforts to identify and secure bids from Section 3 business concerns.
  - e. Promoting the use of business registries designed to create opportunities for disadvantaged and small businesses.
  - f. Engaging in outreach and referrals with the Louisiana Workforce Commission, American Job Centers.

**STATEMENT OF ASSURANCES**  
**INTENT TO COMPLY WITH SECTION 3 REQUIREMENTS**

*(To be returned with all submitted bids)*

\_\_\_\_\_ (Contractor) agrees to implement affirmative steps to comply with the Section 3 requirements set forth at 24 CFR 75 directed at increasing the utilization of lower income residents and businesses within the City or Parish of \_\_\_\_\_.

1. To implement Section 3 requirements by seeking the assistance of local officials in determining the exact boundaries of the applicable project area.
2. To attempt to recruit from within the **Town/City/Parish** the necessary number of lower income residents through local advertising media, signs placed at the proposed site for the project, and community organizations and public or private institutions operating within or serving the project area.
3. To maintain a list of all lower income residents who have applied either on their own or on referral from any source, and to employ such persons, if otherwise eligible and if a vacancy exists.
4. To insert this Section 3 plan in all bid documents, and to require all bidders to submit a Section 3 affirmative action plan including utilization goals and the specific steps planned to accomplish these goals. To formally contact unions, subcontractors and trade associations to secure their cooperation for this program.
5. To maintain records, including copies of correspondence, memoranda, etc., which document that all the above affirmative action steps have been taken.
6. To appoint or recruit an executive official of the company or agency as Equal Opportunity Officer to coordinate the implementation of this Section 3 plan.
7. To list all workforce for this project.

**Please complete the following:**

1. If awarded a contract, do you agree to insert the HUD Section 3 Clause into all Section 3 covered sub-contracts?  
Yes ☐ No ☐
2. If awarded a contract for this CDBG funded project, do you anticipate hiring new employees to complete the project? (Hiring would be specific to this project)  
Yes ☐ No ☐  
If yes, please estimate the number of employees to be hired: \_\_\_\_\_
3. Is your business a Section 3 Business? Yes ☐ No ☐
4. Is the bidder willing to consider hiring Section 3 residents for future employment opportunities that are a direct result of this CDBG funded project?  
  
Yes ☐ No ☐
5. Is the bidder willing to consider subcontracting with Section 3 Businesses for this project?  
  
Yes ☐ No ☐

Contractor Authorized Signature:	
Printed Name:	
Date:	

\*Prime contractors must complete this form with information on all proposed subcontractors at the time of contract and again at the time of project completion, including any additional subcontractors.

☐ Estimated (submitted prior to contract)

☐ Final (submitted at completion)

Type of Contract (Business or Profession)	Name of Subcontractor	Total Approximate Dollar Amount	Section 3 Business ( Y / N )

### Section 3 Business

A Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:

- 1) At least 51 percent owned and controlled by low- or very low-income persons;
- 2) Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
- 3) A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Project Name

\_\_\_\_\_  
Signature of Person Completing Form

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

\*Attach additional sheets when necessary

Name of Business \_\_\_\_\_

Address of Business \_\_\_\_\_

Federal ID Number: \_\_\_\_\_ Unique Entity ID#: \_\_\_\_\_

- ☐ Copy of Articles of Incorporation
- ☐ Assumed Business Name Certificate
- ☐ List of owners/stockholders and % ownership of each
- ☐ Organization chart with names and titles and brief function statement
- ☐ Certificate of Good Standing
- ☐ Partnership Agreement
- ☐ Corporation Annual Report
- ☐ Additional documentation

- ☐ List of all current full-time employees
- ☐ Timesheets/payroll documentation for employee hours for last 3 months
- ☐ List of employees claiming Section 3 status

Business Owner or Authorized Representative

Witnessed by: \_\_\_\_\_

Signature \_\_\_\_\_

---

Signature

Date \_\_\_\_\_

---

Date \_\_\_\_\_

### Section 3 Worker and Targeted Worker Certification Form

(To be submitted as applicable)

A Section 3 Worker seeking the preference in training and employment provided by this part shall certify, or submit evidence to the recipient contractor or subcontractor, if requested, that the person is a Section 3 Worker, as defined in Section 75.5.

Date: \_\_\_\_\_

Worker Name: \_\_\_\_\_

Worker Apartment Complex Name (if applicable): \_\_\_\_\_

Worker Address (will be verified):

\_\_\_\_\_

\_\_\_\_\_

Worker Email Address: \_\_\_\_\_

To meet the income qualifications, you must earn 80% or below of the median income for **Parish or MSA**.

Section 3 Income Limit for Parish or MSA Residents (as of June 1, 2021)	
Annual Income	\$47,850

Place a check mark beside any of the following that apply:

- ☐ My income for the previous year was below the amount listed above\*
- ☐ I am employed by a Section 3 Business
- ☐ I am a YouthBuild participant
- ☐ I reside in public housing or Section 8-assisted housing
- ☐ I reside within one mile of the work site
- ☐ I am *not* a resident of **\_\_\_\_\_**. My Parish is \_\_\_\_\_ and my annual income is \$\_\_\_\_\_.

\*Section 3 income qualification limits are based on where the worker lives and not the location of the project.

I hereby certify that the information provided by me to be true and correct and understand any falsification of any of the information could subject me to disqualification from participation and punishment under the law.

\_\_\_\_\_  
Signature of Worker

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name



# FY 2024 INCOME LIMITS DOCUMENTATION SYSTEM

[HUD.gov](#) [HUD User Home](#) [Data Sets](#) [Fair Market Rents](#) [Section 8 Income Limits](#) [MTSP Income Limits](#) [HUD LIHTC Database](#)

## FY 2024 Income Limits Summary

FY 2024 Income Limit Area	Median Family Income <a href="#">Click for More Detail</a>	FY 2024 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Baton Rouge, LA HUD Metro FMR Area	\$87,400	Very Low (50%) Income Limits (\$) <a href="#">Click for More Detail</a>	30,600	35,000	39,350	<b>43,700</b>	47,200	50,700	54,200	57,700
		Extremely Low Income Limits (\$)*) <a href="#">Click for More Detail</a>	18,350	21,000	25,820	<b>31,200</b>	36,580	41,960	47,340	52,720
		Low (80%) Income Limits (\$) <a href="#">Click for More Detail</a>	48,950	55,950	62,950	<b>69,900</b>	75,500	81,100	86,700	92,300

[www.huduser.gov/portal/datasets/il.html](http://www.huduser.gov/portal/datasets/il.html)



# Reporting & Complaints Requirements





# Reporting Requirements

- The Grantee must report information on the Section 3 Final Labor Hours Compliance Report. (Exhibit A-44)
- This report will be due before final payment can be made to the contractor and will be included in the Program Completion Report.
- Documentation of “good faith efforts” shall be submitted with the Labor Hours Compliance Report.

Technicians	0	0	0	0%	0%
Office/Clerical	0	0	0	0%	0%
Officials/Managers	0	0	0	0%	0%
Sales	0	0	0	0%	0%
Craft Workers (skilled)	0	0	0	0%	0%
Operatives (semiskilled)	0	0	0	0%	0%
Laborers (unskilled)	0	0	0	0%	0%
Service Workers	0	0	0	0%	0%
Other	0	0	0	0%	0%
<b>Total</b>	0	0	0	0%	0%

\* Includes hours worked by Section 3 Workers and Targeted Section 3 Workers

## PART 2: SUMMARY OF EFFORTS

*Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, Section 3 Workers and Targeted Section 3 Workers. Check all that apply.*

<input type="checkbox"/>	Attempted to recruit low-income workers through local advertising, signs prominently displayed at the project site, contacts with community organizations and public or private agencies operating within the metropolitan area in which the Section 3 covered program or project is located (Butler County), or similar methods.
<input type="checkbox"/>	Provided training or apprenticeship programs.
<input type="checkbox"/>	Coordinated with YouthBuild Programs administered in the area in which the Section 3 covered project is located.
<input type="checkbox"/>	Provided or connected Section 3 Workers with employment search assistance such as resume writing, interview preparations, or connecting with placement services.
<input type="checkbox"/>	Engaged in outreach efforts to identify and secure bids from Section 3 business concerns.
<input type="checkbox"/>	Provided technical assistance to help Section 3 business concerns understand and bid on contracts.
<input type="checkbox"/>	Divided contracts into smaller jobs to facilitate participation by Section 3 business concerns.
<input type="checkbox"/>	Provided bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
<input type="checkbox"/>	Promoted use of business registries designed to create opportunities for disadvantaged and small businesses.
<input type="checkbox"/>	Outreach, engagement, or referrals with the state one-stop system as defined in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.

# Requirements for Complaints

- A Section 3 complaint may be filed by an individual representing the interests of a small business, or by a Section 3 resident, alleging non-compliance with Section 3 by the Grantee, contractor, or subcontractor.
- The complaint must be filed within 180 days of the alleged violations with the local HUD field office. The appropriate office can be found at [www.hud.gov](http://www.hud.gov).

# Build America, Buy America - BABA

- The Build America, Buy America Act (BABA) requires that all iron, steel, manufactured products, and construction materials used for federally funded infrastructure projects are produced in the United States, unless otherwise exempt or subject to an approved waiver.
- This requirement is known as the “Buy America Preference (BAP)” and the specific requirements are codified in 2 CFR § 184.

# Products Covered Under BABA

- **Iron and Steel:** Items that consist completely or predominantly of iron, steel, or a combination of both. “Predominantly” means the cost of the iron and steel content exceeds 50% of the total cost of all the item’s components. All manufacturing processes, starting from the initial melting stage and continuing through the application of coatings, must occur in the United States.
- **Construction Materials:** Articles, materials, or supplies used for construction activities that consist of only one of the items described below. For the purposes of the HUD Phased Implementation Waiver timeline described below, construction materials are divided into two categories: specifically listed construction materials and not listed construction materials.

# Products Covered Under BABA

## Specifically Listed Construction Materials: Items include

1. non-ferrous metals;
2. lumber; and
3. plastic- and polymer based composite building materials, pipe, and tube.

## Not Listed Construction Materials: Items include

1. all other plastic- and polymer-based materials (such as polymers used in fiber optic cables),
2. glass,
3. fiber optic cable,
4. optical fiber,
5. engineered wood, and
6. drywall.

- Construction Material Standards (2 CFR 184.6) All manufacturing processes for the construction material must occur in the United States.

# Products Covered Under BABA

## Manufactured Products:

Manufactured products include - articles, materials, or supplies that have either been:

1. Processed into a specific form or shape, or
2. Combined with other articles, materials, or supplies to create a product with different properties than the individual articles, materials, or supplies.

A manufactured product may include components that are construction materials or iron and steel products, unless the manufactured product also meets the definition of iron and steel or construction materials.

In such instances, the product should be re-categorized in the appropriate category. Determining the Cost of Components for Manufactured Products (2 CFR 184.5)

# Products Covered Under BABA

Manufactured products must meet two production requirements:

1. the final product must be manufactured in the United States.
2. at least 55% of the cost of the components making up the manufactured product must be associated with components that were mined, produced, or manufactured in the United States.

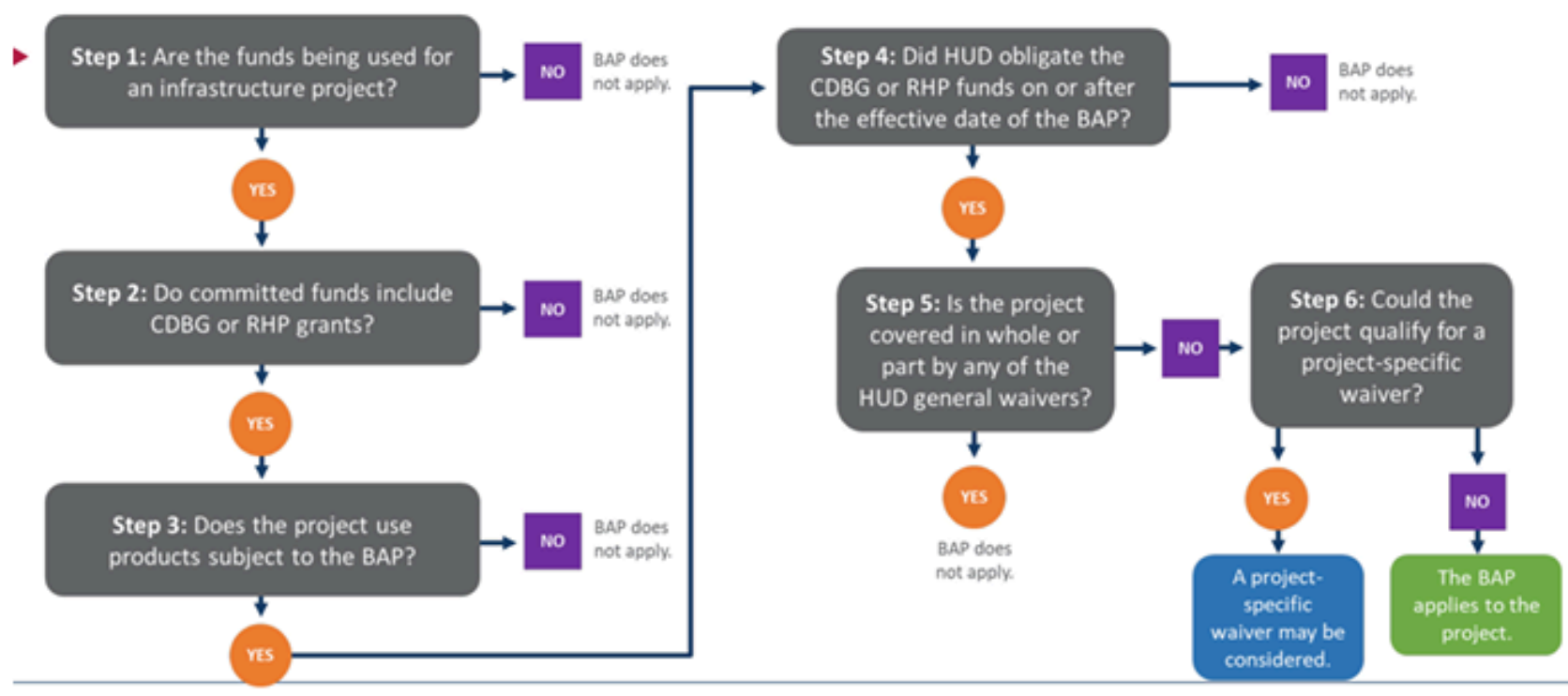


# Waivers & Certifications

- HUD issued a public interest waiver for exigent circumstances, “Public Interest Waiver of Build America, Buy America Provisions for Exigent Circumstances as Public Interest Waiver Applied to Certain Recipients of HUD Federal Financial Assistance”.
- HUD also issued a public interest de minimis, small grants, and minor components waiver titled “Public Interest De Minimis and Small Grants Waiver of Build America, HUD De Minimis and Small Grants Waiver Buy America Provisions as Applied to Certain Recipients of HUD Federal Financial Assistance”.

# Waivers & Certifications

- If it is determined that any additional construction materials are needed that were not included on the itemized cost estimate during the application phase, then the contractor is required to inform OCD-LGA and ensure BABA requirements are implemented as needed.
- A Guide to Help Grantees Determine if BABA Applies has been provided as Exhibit D-8
- If it is determined that the project meets the requirements for a General Waiver, the Grantee must submit written notification to OCD-LGA that justifies the decision for the Department's review and approval.



# Waivers & Certifications

- A “Buy America Certification Form” (Exhibit D-9) must be completed by the prime contractor at the time of the pre-construction conference.
- A “Materials Certification”, included in Exhibit D-2
- Contract Documents Guide, must be completed by the prime contractor and the architect/engineer and submitted with each pay application to the Grantee.
- Certifications must be maintained in the project file for monitoring by OCD-LGA.

## D-9: BUY AMERICA CERTIFICATION FORM

**PURPOSE:** The “Buy America Certification Form” is used to certify that, as required by federal law, all of the iron, steel, specific construction materials – non-ferrous metals, lumber, composite building materials, plastic and polymer based pipe and tube, (for FY24 funded projects and forward), all construction materials, including manufactured products (for FY25 funded projects and forward) utilized in federally funded projects with an aggregate of \$250,000 or more funds, including HUD CDBG and RHP funds, are produced in the United States in a manner that complies with the Build America, Buy America Act, unless an applicable waiver applies or is granted by the Made in America Office of Management and Budget (MIAO).

**GENERAL INFORMATION:** BABA guidance requires the following Buy America preference: 1. All iron and steel used in the project are produced in the United States. This means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States for FY 2023 funded projects forward; and, 2. All listed manufactured products used in the project are produced in the United States. This means the manufactured product was manufactured in the United States, and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation; and, for FY 2025 funded projects forward; 3. All (listed and non-listed) construction materials are manufactured in the United States. This means that all manufacturing processes for the construction material occurred in the United States.

**CERTIFICATION:** I hereby certify the materials installed/to be installed pursuant to the attached Submittal conform to the Build America, Buy America Provisions. Signing this document does not alleviate the signee of providing evidence of such a request.

Grantee Name & Grant Number:

Authorized Representative (Print):

Signature:

Prime Contractor:

Phone Number:

Email:

*The Prime Contractor is responsible for all subcontractors and also ensuring that all manufacturers and suppliers certify materials with the understanding that those certifying the material assume full legal responsibility of the material and are subject to providing documentation verifying the material meets all requirements upon demand. Engineers and/or Architects signed or stamped acceptance of the attached submittal declares the submittals and accompanying materials meet BABA requirements. Any additional materials needed for the project should be itemized, specify if BABA applies, and then certified by the engineer prior to submittal to OCD.*

**\* Attach the final certified itemized cost estimate that identifies all materials subject to BABA**

### Build America Buy America Materials Certification

Grantee: \_\_\_\_\_ Contract Number: \_\_\_\_\_

Contractor: \_\_\_\_\_ Invoice Period: \_\_\_\_\_

Material Type (Steel, Iron, Manufactured Goods, Construction Materials)	Description	Name of Manufacturer	Location of Product

By signing, I certify that the statements made above are true to the best of my ability and knowledge and that the listed materials for use in this project funded by federal dollars were produced in the United States of America.

Contractor Signature:		Engineer Signature:	
Print Contractor Name:		Print Engineer Name:	
Contractor Company:		Engineering Firm:	



## *Contact Information*



Denease McGee-Section 3

Program Manager

Phone: 225-342-7530

Email: [Denease.McGee2@la.gov](mailto:Denease.McGee2@la.gov)

Fenishia Favorite, BABA

Policy and Program Coordinator

Phone: 225-342-5884

Email: [Fenishia.Favorite@la.gov](mailto:Fenishia.Favorite@la.gov)





# Louisiana Rural Water Association

## RATE STUDY

Presented By: Susan Robbins

# URA Training

Presented by: Lisa Bergeron

# *What is URA?*

- Developed by U.S. Department of Transportation, Federal Highway Administration.
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and Section 104(d) of the Housing and Community Development Act.
- This is a federal law enacted by Congress -- Ensures general population is treated fairly and equitable when real property is acquired which will be funded in whole or in part by Federal funds
- Federal regulation code: 49 CFR Part 24

# *URA Applicability*



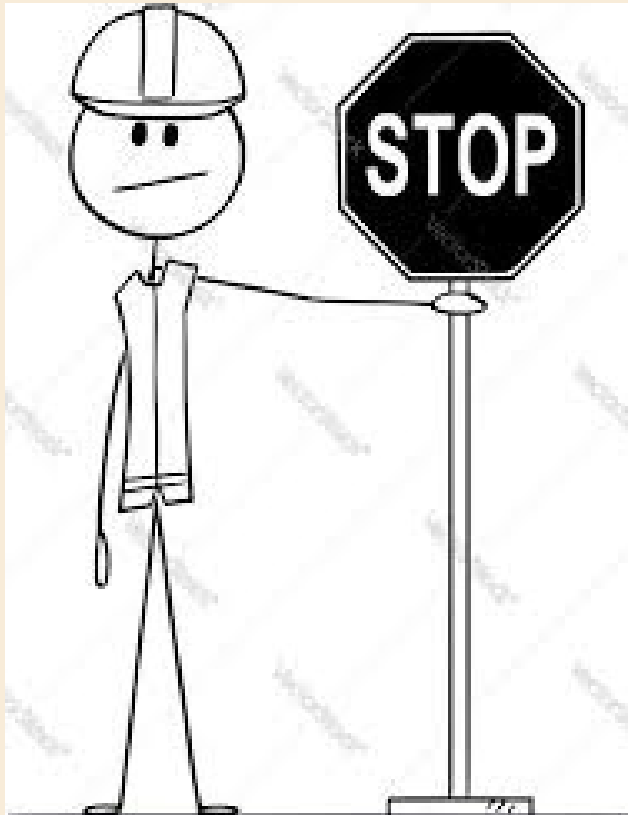
- Publicly funded projects
- Real Property
  - Acquisition of real estate parcels, including easements and servitudes
  - Leases (50+ years, automatically renewable)
  - Rights-of-Way
- Rehabilitation
- Demolition
- Section 104(d) of the HCDA of 1974: impacts both acquisition and determination of relocation for LMI households.

**\*\*Note:** We do not accept projects that would trigger relocation of individuals.

# *Categories of Acquisition*

- Donation
- Waiver Evaluation
  - Less than \$15,000
  - No appraisal required
  - Uncomplicated - no structures
- Purchase at appraisal price
- Administrative Settlement- more than appraisal price
  - Negotiation with seller
  - Written justification

**Construction cannot begin  
until acquisition is complete!**



# *Types of Acquisition*

## Voluntary, without eminent domain

- Local Governments cannot acquire property if the negotiations fail to result in an amicable agreement
  - And, Local Governments will inform the owner of what it believes to be the market value of the property
  - Not eligible for relocation benefits
- \*Note: A property's owner's willingness to cooperate does not constitute voluntary acquisition.*

## Involuntary

- Subject to full URA acquisition requirements in Subpart B.
- Local Governments may or may not opt to exercise power of eminent domain to acquire property

# Knowledge Check...

If an acquisition took place prior to the application submission, is it still subject to URA?

Perhaps, if there is clear evidence the intent was there to acquire property for a federal assisted project at any point of during the course of the transaction.



# *Next steps for URA and LCDBG Requirements*

- Determine ownership
- Send Preliminary Acquisition Notice and When a Public Agency Acquires Your Property (Form C-1 in Handbook)
- Determine if an appraisal and review appraisal will be required
- Obtain a Valuation of the Property
- Prepare the Statement of Just Compensation (Form C-2 in Handbook)
- Send the Written Offer to Purchase (Form C-3 in Handbook)
- Conclude final negotiations
- Prepare sales contract and complete the sale
- Provide a Statement of Settlement Costs
- Record the Title

# Attachment for Preliminary Notice Form

## WHEN A PUBLIC AGENCY ACQUIRES YOUR PROPERTY

US Department of Housing and Urban Development

Office of Community Planning

HUD-1041-CPD, March 2005

[www.hud.gov/relocation](http://www.hud.gov/relocation)

### Introduction

This booklet describes important features of the **Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970**, as amended (URA) and provides general information about public acquisition of real property (real estate) that should be useful to you.

Most acquisitions of real property by a public agency for a Federal project or a project in which Federal funds are used are covered by the URA. If you are notified that your property will be acquired for such a project, it is important that you learn your rights under this important law.

This booklet may not answer all of your questions. If you have more questions about the acquisition of your property, contact the Agency responsible for the project. (Check the back of this booklet for the name of the person to contact at the Agency.) Ask your questions before you sell your property. Afterwards, it may be too late.

### General Questions

#### **What Right Has Any Public Agency To Acquire My Property?**

The Federal Government and every State government have certain powers which are necessary for them to operate effectively. For example, they have the power to levy taxes and the power to maintain order. Another government power is the power to acquire private property for public purposes. This is known as the power of eminent domain.

The rights of each of us are protected, however, by the Fifth and Fourteenth Amendments of the U.S. Constitution and by State constitutions and eminent domain laws which guarantee that if a public agency takes private property it must pay "just compensation" to the owner. The URA provides additional protections, as explained in this booklet.

#### **Who Made The Decision To Buy My Property?**

The decision to acquire a property for a public project usually involves many persons and many determinations. The final determination to proceed with the project is made only after a thorough review which may include public hearings to obtain the views of interested citizens.

If you have any questions about the project or the selection of your property for acquisition, you should ask a representative of the Agency which is responsible for the project.

- As soon as the local government decides it wants to acquire the property, a **Preliminary Acquisition Notice** must be sent to the owner
- Must be accompanied by the *When a Public Agency Acquires Your Property* brochure Exhibit C-1 in Grantee Handbook

# Attachment for Preliminary Notice Form

## WHEN A PUBLIC AGENCY ACQUIRES YOUR PROPERTY

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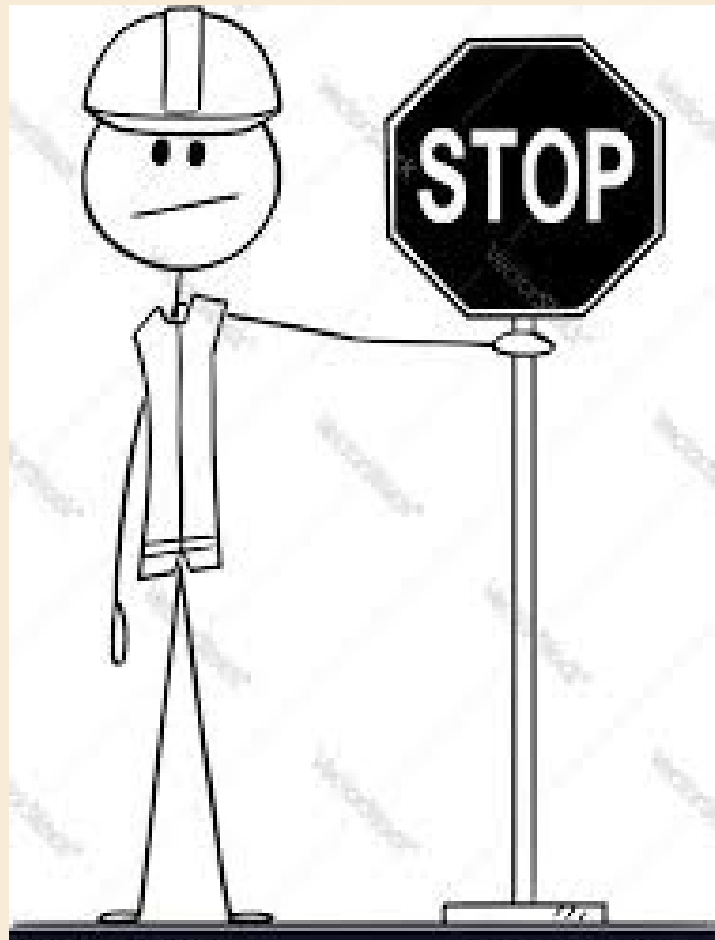
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If you have any questions about the project or the selection of your property for acquisition, you should ask a representative of the Agency which is responsible for the project.

- This document includes the following statement: **“What Happens If I Don't Agree To The Agency's Purchase Offer?”**
- If you are unable to reach an agreement through negotiations, the Agency may file a suit in court to acquire your property through an eminent domain proceeding.”
- This statement negates a determination of “voluntary acquisition”.

# Can you start construction yet?



# *Appraisals, Review Appraisals, and Valuation of Property*

How do I know which one?

Generally, one of two conditions will require an appraisal

1. The value of the property is more than \$15,000
- OR
2. The owner of the property wants an appraisal.

# *Valuation of the Property*

Valuation of Property is obtained to prepare the Statement of Just Compensation

- If appraisal and a review of appraisal are required, valuation is based on appraisals.
  - If the review is higher, you go with the higher monetary value.
- If appraisals/review appraisal is not required - person familiar with the real estate market may provide.
- Sign and date valuation
- Include qualifications of qualified individual preparing
- Description of the property
- An estimated value of the property

# *Contract for Appraisal Services*

- The Local Government --selects an independent, arm's-length appraiser; no affiliation to the property or owners.
- Local Government follows procurement procedures
- Minimum of 1 appraisal is required.
- You could have 2 if it is a “hot button” property or the value exceeds \$100,000
- Compensation for an appraisal shall not be based on the amount of the valuation

Refer to **Exhibit C-7, Agreement for Appraisal Services** (Acquisition), for a sample appraisal contract.

# *Appraisal Standards*

- Uniform Appraisal Standards for Federal Land Acquisitions.
- Property > \$250,000, appraiser must be certified and licensed in accordance with state law, and must be currently active on the Louisiana State Certified Appraisal and the State's General Appraisal lists.
- Property < \$250,000, the local government may use a General Appraiser or a Residential Appraiser for the appraisal and review appraisal.



# *Day of Appraisal*

- Local Government or the appraiser must invite the property owner to accompany the appraiser during the inspection of the property.
- This notice must be in writing and a copy placed in the property acquisition file along with evidence of receipt by the owner.
- The requirement to invite the property owner for the review appraisal is optional.

# *Review Appraisal*

- Obtained after the appraisal has been submitted to the Local
- The review must be conducted by a qualified staff appraiser or an independent fee appraiser.
- The review appraiser is required to visit the property.
- The review must be written, signed, and dated.
- Review Appraisal Report for required elements may be used Exhibit C-11 .

# *Review Appraisal*

- If there is discrepancy between the two appraisals, Local Government can request modifications from the initial report and document any changes in the original report.
- When differences are not resolved by the modification of the first appraisal, the review appraisal is the authoritative.
- The local government also has the option of obtaining another appraisal and review appraisal.

# *Acquiring Property without an Appraisal*

Instances where an Appraisal is not performed:

- Local Government can determine that the valuation does not exceed \$15,000.
- The owner does not desire an appraisal,
- If an appraisal is not required, then a review appraisal will not be required.
- In some instances where appraisal costs can approach or exceed acquisition costs, the OCD may decide on a case-by-case basis to waive the appraisal process
  - the valuation of the property is uncomplicated
  - fair market value of the property is estimated to be \$15,000 or less, and
  - the owner of the property has not requested an appraisal).

# *C-3: Written Offer to Purchase*

## **Written Offer to Purchase the Determination of Just Compensation**

Included:

- the amount, the offer must specify
- the date negotiations will begin. (Same date as the written offer)
- Sent certified or registered mail, with return receipt
- Notice of Displacement must be issued within 30 days of the date specified for the initiation of negotiation if property is occupied.

# Knowledge Check...

Can your CDBG project begin construction prior to the appraisal process being complete?

Yes

No

NO, it cannot begin until all paperwork is complete and the title is recorded.

# Knowledge Check...

Is an appraisal always required?

No!

An appraisal is required when the property is valued at \$15,000 or more.

Or if the property owner requests an appraisal to be done.

# *Acquisition NOT subject to the Uniform Act*

Acquisition from another public agency.

Short term lease

Voluntary acquisition

Acquisition of streets under LRS 48:491



*Not to be used to get around the Uniform Act.*



# *Monitoring Acquisition*

At monitoring, OCD-LGA will review the local government's acquisition files.

Even grants with no acquisition still need proof of ownership of all properties or maintenance of all streets involved with the project.

- Attorney opinion
- A copy of the title of the properties as recorded at the courthouse
- STREETS: proof of maintenance for at least three years (Louisiana Revised Statute 48:491)
- Construction cannot begin until all acquisition documentation is completed.

# Resources

It is important to remember that any acquisition is subject to the URA if federal financial assistance is a part of any portion of the project, regardless of whether or not the federal financial assistance is actually used for the acquisition of real property

- HUD Handbook 1378  
<https://www.hud.gov/sites/dfiles/OCHCO/documents/1378c5CPDH.pdf>
- Federal Highway Admin website  
[https://www.fhwa.dot.gov/real\\_estate/uniform\\_act/acquisition/real\\_property.cfm](https://www.fhwa.dot.gov/real_estate/uniform_act/acquisition/real_property.cfm)
- Applicability of acquisition requirements, 49 CFR Part 24  
<https://www.ecfr.gov/current/title-49/subtitle-A/part-24/subpart-B/section-24.101>
- HUD URA Online Training series  
<https://www.hudexchange.info/trainings/ura-the-hud-way/>



# **Procurement**

**Presented By:  
William Hall**

# Procurement Regulations

- **CDBG Regulation 24 CFR § 570.489(g)**  
**Procurement Policy**  
“The State shall establish requirements for **procurement policies** and procedures for units of general local government...”
- **UAR 2 CFR § 200.320** **Procurement Procedures.**  
“The non-Federal entity must have and use documented procurement procedures, consistent with the standards of this section...”

# Procurement Policy

A general statement or guidelines that are applicable to all procurement activities conducted by the Grantee/Subrecipient

Public Procurement Practice

DEVELOPING A PROCUREMENT  
POLICY MANUAL

---

## STANDARD

Procurement organizations should develop a comprehensive policy manual that clearly defines authority, responsibility, and establishes guidelines for the organization and the procurement professional to follow when carrying out their responsibilities.



PRINCIPLES AND  
PRACTICES OF  
PUBLIC PROCUREMENT

# Revised Procurement Policy



Location on  
the OCD-  
LGA website

Program	PROCUREMENT	
ent	<a href="#">LMA Procurement Workshop - 10/21/2021</a>	<a href="#">Procurement and Citizen Participation Slideshow 1/28/2021</a>
e Water		
ent		
ion	<a href="#">LCDBG Procurement Procedures</a>	<a href="#">Local Government Procurement Policy</a>
rant		
ference		
agement -	<a href="#">Components of Requests for Proposals (RFP) and Requests for Qualifications (RFQ)</a>	<a href="#">Allowable Professional Services Costs</a>
Handbooks		
antee		
ok Exhibits		
DBG	<a href="#">Administrative Cost Reasonableness</a>	<a href="#">Engineering Cost Reasonableness</a>
Handbook		
bits	<a href="#">Subrecipient Agreement for Administrative Activities</a>	<a href="#">LCDBG Administrative Consultant Contract</a>
Handbook		
bits		
n A		
n B		

# **Procurement Policy**



# Procurement Policy

- OCD has **revised** the procurement policy that all recipients must adopt
- The previous existing policy contains obsolete terms and thresholds and is missing some essential components

**Requirement:** LCDBG recipients must adopt the new Procurement Policy

# Revised Procurement Policy

[On the OCD/LGA  
website]

## PROCUREMENT POLICY

These policy provisions are intended to serve as the legal authority for the procurement of supplies, equipment, construction services and professional services for the [UGLG/NFE subrecipient NAME] in the conduct of all of its Federal programs [and the UGLG/subrecipient's purchases]. These policy provisions meet the Federal grant standards established in 2 CFR 200.317-326.

### PURPOSE

The purpose of this Statement of Procurement Policy is to: (1) provide for the fair and equitable treatment of all persons or firms involved in purchasing by [UGLG/NFE subrecipient NAME]; (2) assure that supplies, services, and construction are procured efficiently, effectively, and at the most favorable prices available to the [UGLG/NFE subrecipient]; (3) promote competition in contracting; provide safeguards for maintaining a procurement system of quality and integrity; and (4) assure that [UGLG/NFE subrecipient] purchasing actions are in full compliance with applicable State laws, Federal standards, [UGLG/NFE subrecipient] ordinances, regulations or other relevant policies.

### PROCUREMENT AUTHORITY AND ADMINISTRATION

The primary purchasing/procurement authority for the [UGLG/NFE subrecipient] shall be the [job title/position]. All procurement transactions shall be conducted and administered by the [job title/position].

The [purchasing/procurement authority] shall insure that there are sufficient unencumbered funds available to cover the anticipated cost of each procurement before contract award or modification (including change orders), work is inspected before payment, and payment is made promptly for contract work performed and accepted.

The [purchasing/procurement authority] shall insure the appropriate method of procurement is used for the particular purchase considering Federal, State and [UGLG/NFE subrecipient] dollar thresholds.

The [purchasing/procurement authority] shall insure the appropriate contract and prices are applied to the particular purchase.

# Revised Procurement Policy Topics

- PURPOSE
- PROCUREMENT AUTHORITY AND ADMINISTRATION
- CODE OF CONDUCT
- FAIR AND OPEN COMPETITION
- SOLICITATIONS AND ADVERTISEMENTS
- CONTRACTING WITH SMALL AND MINORITY BUSINESS
- SUSPENSION AND DEBARMENT
- PROTESTS
- CONTRACT TYPES
- TYPES OF PRICES
- COST REASONABLENESS
- PROCUREMENT RECORDS
- FEDERAL CONTRACT PROVISIONS
- PROCUREMENT METHODS AND PROCEDURES

# Adapting the Procurement Policy and Procedures

## Terminology (UGLG/NFE Subrecipient)

**UGLG:** Unit of General Local Government [24 CFR 570.3]

- Parish Police Jury/Council/Government
- City
- Town
- Village

**Requirement:** Replace UGLG with your government description

# Procurement Policy

## Revised Procurement Policy Topic

### PROCUREMENT AUTHORITY AND ADMINISTRATION

- PURPOSE
- CODE OF CONDUCT
- FAIR AND OPEN COMPETITION
- **SOLICITATIONS AND ADVERTISEMENTS**
- CONTRACTING WITH SMALL AND MINORITY BUSINESS
- SUSPENSION AND DEBARMENT
- PROTESTS
- CONTRACT TYPES
- TYPES OF PRICES
- COST REASONABLENESS
- PROCUREMENT RECORDS
- FEDERAL CONTRACT PROVISIONS
- PROCUREMENT METHODS AND PROCEDURES

# Procurement Policy Changes

## **PROCUREMENT POLICY: Solicitations**

“The nearest metropolitan statistical area [MSA] to the [UGLG/NFE subrecipient] is [name of City] and whose largest general circulation newspaper is [name of MSA newspaper].”

**Requirement:** Identify by name the MSA City and the general circulation newspaper in your Procurement Policy.

# Procurement Policy Changes

**PROCUREMENT POLICY: Uniform and secure electronic interactive system**

**Requirement:** If you use or are required to use [R.S. 38:2212(E)] the internet for procurement activities describe them in your Procurement policy.

“The City provides, as an additional bidding option, a uniform and secure electronic interactive system for the submittal of bids or proposals by utilizing “centralauctionhouse.com”.

-OR-

**Requirement:** Otherwise make the statement in your Procurement policy “The City does not and is not required to provide a uniform and secure electronic interactive system for the submittal of bids.”

# Procurement Policy

## **Revised Procurement Policy Topics**

- PURPOSE
- PROCUREMENT AUTHORITY AND ADMINISTRATION
- CODE OF CONDUCT
- FAIR AND OPEN COMPETITION
- SOLICITATIONS AND ADVERTISEMENTS
- CONTRACTING WITH SMALL AND MINORITY BUSINESS
- SUSPENSION AND DEBARMENT
- PROTESTS
- **CONTRACT TYPES**
- **TYPES OF PRICES**
- COST REASONABLENESS
- PROCUREMENT RECORDS
- FEDERAL CONTRACT PROVISIONS
- PROCUREMENT METHODS AND PROCEDURES



# Types of Contracts

Procurement Policy Changes

- Federal procurement regulations identify three types of contracts that may be used in contracting with private parties.

2 CFR 200.324

**Firm fixed price:** For Specified Accomplishments  
**Cost reimbursement:** Accomplishments and Efforts  
**Time and materials:** For Efforts

# Types of Contracts

## Procurement Policy Changes

The LCDBG program does not fund projects without a definitive Scope of Work. There will never be a reason to use a “Time and Materials” type of contract.

### TYPE

### USED FOR

Firm fixed price

Specified Accomplishments

Cost reimbursement

Accomplishments and Efforts

Time and materials

For Efforts

---

# Types of Contracts

## Procurement Policy Changes

- **Firm fixed-price.** This contract type requires the delivery of products or services at a specified price, fixed at the time of contract award and not subject to any adjustment on the basis of the contractor's cost experience in performing the contract.
- **Cost-reimbursement.** Cost-reimbursement types of contracts provide for payment of allowable incurred costs, to the extent prescribed in the contract.

# Types of Contracts

- **Cost Reimbursement and Time and Materials** contracts establish an estimate of total cost for the purpose of obligating funds and with a predetermined cost ceiling that the contractor may not exceed (except at its own risk) without the approval of the Grantee.
- Contractors are not guaranteed payment of the contract ceiling
- Ceiling can be adjusted based on cost experience

# Procurement Policy: Contract Types and Prices

## TYPES OF PRICES

The [the purchasing/procurement authority] shall insure the appropriate type of price(s) as determined by the nature of the purchase are included in the contract. Percentage of construction cost or any other indefinite metric will not be used for price determination in any contract funded in whole or in part with Federal funds.

**Lump Sum** is a type of Price, not a type of Contract

**Requirement:** Use the appropriate contract type with the correct type of price(s) for each procurement.

# Contract Prices

- Lump Sum Price
  - For definable work product(s) or deliverable(s) whose value can be expressed as a single price inclusive of all production costs [labor, materials and purchased service costs, allowable overhead and profit].
- Unit Price
  - For definable work products or deliverables whose value can be expressed as a single price inclusive of all production costs [labor, materials and purchased service costs, allowable overhead and profit] for contract tasks or items and will be needed in two more iterations at the same agreed upon price.

# Contract Prices

- Billable Hours
  - For work efforts that are composed of preponderantly personnel compensation costs with a minimum of outside purchases of materials and services needed to produce a work product or provide a service; the contractor will be reimbursed for applied work efforts at the agreed upon billable hourly rate(s) inclusive of direct labor compensation, overhead, general and administrative expenses, and profit [fully burdened] by job title.
- Reimbursable Costs
  - For work efforts that require significant outside purchases of materials, services or from subcontractors in addition to the contractor's personnel compensation costs needed to produce a work product or service.

# **Procurement Procedures**



# Procurement Procedures

The Federal grant procurement regulations [2 CFR 200 Subpart D] never provided “procedures” to follow, they had “standards” that State and local government “procedures” had to meet for each method of procurement.

**Requirement:** Review and revise or develop procurement procedures that meet the federal regulation standards for all procurement methods.

# Procurement Standards for Procedures

- Federal Procurement Standards applicable to procedures for each procurement method:
  - a. Applicable dollar thresholds for each method
  - b. Type of purchase and use
  - c. Solicitation requirements for each method
  - d. Basis for contractor selection
  - e. Federal contract type and payments
  - f. Cost reasonableness
  - g. Procurement records

# **Procedure Components**

**Categories of Purchases [4]**

**Procurement Methods [4]**

**Selection Methods [3]**

**Solicitation Types [3]**

**Contract Types [3]**

**Price Types [4]**

**Payment Types [3]**

# **Applicable State Procurement Procedures**

**Method: Sealed Bids [2 CFR 200.320(b)(1)]**

- R.S. 38:2212 Public Works Construction exceeding \$250,000
- R.S. 38:2212.1 Materials and Supplies exceeding \$60,000
- R.S. 38:2212.1 Law enforcement vehicles exceeding \$40,000

# ***NOT* Applicable State Procurement Procedures**

Method: Small Purchase[2 CFR 200.320(a)(2)]

- R.S. 39:1596 Small Purchases

Section 1: All departments, institutions, boards, commissions, budget units, and agencies of the executive branch of **state government**, and the officers and employees thereof, (hereafter "agency") shall observe, be guided by, and implement the specific directives on small purchase procedures set forth in this Order.

# ***NOT* Applicable State Procurement Procedure**

Method: Sealed Bids [2 CFR 200.320(b)(1)]

**Louisiana Attorney General  
Opinion 10-0026 May 4, 2010**

**“Demolition** does not involve erection, construction, alteration, improvement, or repair. Accordingly, demolition activities are **not subject** to the advertising and bidding requirements of Louisiana Public Bid Law.”

# **Procurement Standards for State Sealed Bid Law Procedures RS 38:2212**

- Procurement Standards applicable to Sealed Bid Method

<b>Applicable dollar thresholds:</b>	<b>\$250,000</b>
<b>Type of purchase and use:</b>	<b>Design Specifications for PW construction</b>
<b>Solicitation requirements for:</b>	<b>Public advertising 3x over 3 weeks</b>
<b>Basis for contractor selection:</b>	<b>Lowest responsive bid</b>
<b>Federal contract type and payments:</b>	<b>Fixed price contract, progress payments</b>
<b>Cost reasonableness</b>	<b>Obtain opinion of probable cost</b>
<b>Procurement records</b>	<b>Minutes of bid opening, tabulation</b>

# Local Government Procurement Procedures

- Must have written procedures that meet the standards for the other procurement methods
- Micro-purchase
- Small purchase
- Sealed bids below the State threshold(s)
- Competitive proposals
- Non-competitive proposals

**Requirement:** develop procedures that meet the federal grant procurement standards for the other methods of procurement.



# **Local Government Procurement Procedures**

To help meet this requirement OCD-LGA has developed sample wording for procedures that meet the standards for each federal method of procurement.

# Local Government Procurement Procedures

Sample

Procurement  
Procedures

[On the OCD/LGA  
website]

**Cost/price thresholds:** The Small Purchase threshold for the [UGLG/NFE Subrecipient] shall be \$ \_\_\_\_ or less. [at least \$10,000 – and cannot exceed \$250,000 for Federal awards].

State thresholds for using the Small Purchase thresholds and do not require sealed bids [La RS 38:2212.1] Supplies and Materials \$59,999,000 and below; Used or New vehicles for law enforcement \$39,999 and below, Road maintenance or improvement equipment \$24,999 and below. The State Small Purchase threshold for other designated items is more than \$10 and less than \$29,999.

**Price/Cost information and Categories of Purchase:** Existing vendor information according to the item or product purchase description for Specified Product, Brand Name or Equal purchases and limited use for Design Specifications to include public works/construction under the State sealed bid threshold.

**Small Purchase Procedure: General requirements for use of the Small Purchase Method.** The Small Purchase method can be utilized for simple fixed price purchases that are below the various State and Federal cost/price thresholds that require advertised sealed bidding (IFB) and are only for purchases that have definitive products or completed services.

The [purchasing/procurement authority] shall develop or describe a purchase requirement that meets the all the dollar thresholds and allowable uses of the Small Purchase method. The [purchasing/procurement authority] shall conduct Small Purchases by making the selection principally based on price but may also justify other selection factors such as delivery schedules that are important to the selection.

**Small Purchase Procedure: Procurements not allowable for the Small Purchase method.**

Notwithstanding any cost/price thresholds, the Small Purchase method shall not be used:

If the purchase categories are for Scope of Work or Performance Specifications and or;

If the purchase is for products or services in which there are complex questions to be considered or specific contract provisions to be included (inspection and testing, insurance, patents, price adjustments, etc.); and/or

# Procurement Procedures

## Location on the OCD-LGA website



Program	<h2>PROCUREMENT</h2>	
ent	<a href="#">LMA Procurement Workshop - 10/21/2021</a>	<a href="#">Procurement and Citizen Participation Slideshow 1/28/2021</a>
e Water	<a href="#">LCDBG Procurement Procedures</a>	<a href="#">Local Government Procurement Policy</a>
ent	<a href="#">Components of Requests for Proposals (RFP) and Requests for Qualifications (RFQ)</a>	<a href="#">Allowable Professional Services Costs</a>
ion		
rant	<a href="#">Administrative Cost Reasonableness</a>	<a href="#">Engineering Cost Reasonableness</a>
ference	<a href="#">Subrecipient Agreement for Administrative Activities</a>	<a href="#">LCDBG Administrative Consultant Contract</a>
agement -		
Handbooks		
antee		
ok Exhibits		
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Handbook		
bits		
Handbook		
bits		
n A		
n B		

# Local Government Procurement Procedures

**Small Purchase Procedure: General requirements for use of the Small Purchase Method.** The Small Purchase method can be utilized for simple fixed price purchases that are below the various State and Federal cost/price thresholds that require advertised sealed bidding (IFB) and are only for purchases that have definitive products or completed services.

The [purchasing/procurement authority] shall develop or describe a purchase requirement that meets the all the dollar thresholds and allowable uses of the Small Purchase method. The [purchasing/procurement authority] shall conduct Small Purchases by making the selection principally based on price but may also justify other selection factors such as delivery schedules that are important to the selection.



To be replaced

# **Adapting the procurement policy and procedures**

**[purchasing/procurement authority]**

**Job title of person within the organization who will  
perform the designated procurement function**

**Requirement: Designate by job title of person  
appointed to perform each procurement function and  
replace “purchasing/procurement authority”**

# Examples: Procurement Job Titles & their Function

## Examples: Procurement Job titles and their function:

- **Micro-purchase Procedure: Determining Cost reasonableness**

“The **Finance Director** will make a determination that the price is fair and reasonable provide a description of how the City made its determination.”

- **Sec. 2-217. Evaluation form.**

“The **chief administrative officer** shall develop a form to be used in the evaluation of proposals by each selection review panel convened.”

- **Sec. 9-30. Preparation and distributing of specification sheet.**

“(a)The **purchasing agent**, upon receipt of the written request or resolution, shall have the necessary specifications for the items to be bidden upon prepared by the appropriate department head, engineer or consultant. “

# **Additional Notes on Procurement Procedures**

Federal and State price/cost thresholds change

Use of the Small Purchase method has several limitations

The Federal Sealed Bid/[IFB] method has wider applications than does the State Sealed Bid law

The Federal standards for the Competitive Proposal method include “must have a written method for conducting technical evaluations of the proposals”





Public Procurement Practice  
DEVELOPING A PROCUREMENT  
POLICY MANUAL

---

Public Procurement Practice  
STRATEGIC PROCUREMENT PLANNING

---

Public Procurement Practice  
REQUEST FOR PROPOSALS (RFP)

---

Public Procurement Practice  
SPECIFICATIONS

---

**NIGP** The Institute for  
Public Procurement



PRINCIPLES AND  
PRACTICES OF  
PUBLIC PROCUREMENT



## PROCUREMENT TOOLBOX

# WHAT IS PROCUREMENT?



Procurement is a function that exists in both the public and private sector for acquiring goods and services for an organization or government. Public procurement is the legal authority that advises, plans, obtains, and evaluates a government's expenses on goods and services that are used to fulfill any government activities, obligations, and objectives.<sup>1</sup>

Procurement is an essential function within state and local governments to help reduce costs and generate savings, and participants in procurement should follow principles such as impartiality, flexibility and effective use of public funds to ensure that they are keeping procurement transparent and fair.<sup>2</sup>



### TOOLS TO LEARN MORE

Take the Procurement U, [Procurement 101: Foundations of Public Procurement Course](#) to build up your building block knowledge of public procurement!

<sup>1</sup> "101: Foundations of Public Procurement," NASPO, accessed February 22, 2023, <https://procurement.naspo.org/6/login>



## PROCUREMENT TOOLBOX

# SOLICITATION METHODS

## WHAT IS A SOLICITATION?

A solicitation is a method for procurement offices to select a supplier for their contract. It includes how the office chooses to announce, request, and receive responses from potential suppliers<sup>1</sup>. The American Bar Association (ABA) classifies source selection methods into three categories: formal competition, informal competition, and non-competitive procurement.



## TYPES OF SOLICITATION METHODS



## *Contact Information*



William Hall  
Grant Specialist  
[William.hall@la.gov](mailto:William.hall@la.gov)  
225-219-3613

Denease McGee  
Program Manager  
[Denease.Mcgee2@la.gov](mailto:Denease.Mcgee2@la.gov)  
225-342-7530



# Labor Standards

Presented by: Teresa Holley

# *Local Government Responsibilities*

Each local government is responsible for ensuring compliance with Labor Standards

- The local government delegates a Labor Compliance Officer (LCO), often an administrative consultant, but ultimately it's up to the local government to make sure compliance is met.
- See Exhibit B-1 (Appointment of Labor Compliance Officer)
- The local government is also responsible for maintaining a labor file



# *Regulations/Requirements*

## 1.Davis-Bacon Related Acts

- DBA and DBRA – deals with prevailing wages

## 2.Copeland “Anti-Kickback” Act

- Deals with the anti-trust act, payrolls, Statements of Compliance, and deductions

## 3.Contract Work Hours and Safety Standards Act (CWHSSA)

- Deals with OT/time-and-a-half

## 4.Louisiana Law (as opposed to federal law)

- If the state law is more stringent, then the state law governs

## 5.LCDBG Requirements

- Any requirements we have under LCDBG

# *What is Davis-Bacon?*

## Davis-Bacon Act vs. Davis-Bacon Related Acts

- The DBA was enacted by Congress to cover contracts that are directly federally funded. After the DBA was enacted, they extended the reach of DBA provisions by passing the DBRA, which covers contracts that are indirectly federally financed (or assisted) in whole or in part)
- Meaning: Since LCDBG projects are funded through HUD, most of the projects LCDBG works with are subject to DBRA.

DBA and DBRA are very similar in substance and purpose and will be referred to interchangeably in our Handbook and communications

Davis-Bacon requires payment of locally prevailing wages to laborers and mechanics for on-site construction, alteration, or repair on federally financed projects with contracts over \$2,000

- These wages are decided by the Department of Labor (DOL) and made available as wage decisions
  - A contractor on an LCDBG project must meet, at a minimum, the wage requirements set forth in the prevailing wage decisions.



# Copeland “Anti-Kickback” Act

The Copeland “Anti-Kickback” Act is a federal law that applies to contracts receiving federal financial (assistance) that are subject to Davis-Bacon Requirements.

- It outlaws paying the employer kickbacks, requires weekly payrolls, Statements of Compliance, and permission for pay deduction(s) not prescribed by law

There is a Payroll Deduction Authorization Form (Exhibit B-13) in our Handbook that an employee fills out to show other deductions

- Anytime there’s something other than state taxes or FICA being deducted, this form has to be filled out providing explanation and monetary amounts for the other deductions
- Deductions: union dues, 401K, loan payback, uniforms, etc., may only be made with the permission of the employee

## B-13: PAYROLL DEDUCTION AUTHORIZATION

### Payroll Deduction Authorization

Grant Recipient: \_\_\_\_\_  
LCDBG Contract #: \_\_\_\_\_  
Employee Name: \_\_\_\_\_  
Employer Name: \_\_\_\_\_

One box should be marked with an “x”. Occasionally more than one box will be marked. In addition to deductions authorized by law, such as social security and income taxes, the following deduction(s) will be subtracted from the employee’s paycheck(s)

- ☐ I authorize weekly deduction(s) as described below.  
☐ I authorize a one-time deduction(s), as described below.  
☐ I authorize deduction(s), below, to be subtracted from my paycheck for \_\_\_\_\_ weeks.

<u>Description of Additional Deductions*</u>	<u>Amount</u>

Employee Signature \_\_\_\_\_

Date \_\_\_\_\_

\*Types of deductions may include retirement, health insurance, uniforms, loans and advance on wages. Deductions for garnishments, such as court orders and child support, may be authorized by this form or an appropriate legal document.

# *Contract Work Hours and Safety Standards Act (CWHSSA)*

CWHSSA is a federal law that requires time-and-a-half pay for any hours worked in excess of 40 during a workweek

- Has liquidated damages of \$27 per person per day for any hours in excess of 40 in a given workweek in addition to restitution paid to worker

There are two methods to addressing the liquidated damages penalties:

## 1. Contractor requests a waiver from HUD

- Ex: contractor finds out that he underpays an employee, he outlines it and pays the extra money to the employee and sends this office a request for the liquidated damages to be waived. We pass it along to HUD, and hopefully they grant the waiver and don't have to worry about paying any extra restitution

## 2. Contractor has to pay HUD by wire transfer

- Ex: all the previous steps were made, but the waiver isn't granted. The contractor will then have to follow the guidance given by HUD to pay a wire transfer and makes for a significantly longer process

# Wage Decision Example

## WAGE DETERMINATIONS

### Davis-Bacon Act WD # LA20220004

Modification #

4

Construction

Heavy

Last Revised Date

Mar 18, 2022

Wage Determination

## States and Counties

State

Louisiana

Counties

Allen, Assumption, Avoyelles, Beauregard, Bienville, Caldwell, Cameron, Catahoula, Claiborne, Concordia, De Soto, East Carroll, East Feliciana, Evangeline, Franklin, Grant, Iberia, Iberville, Jackson, Jefferson Davis, La Salle, Lincoln, Madison, Morehouse, Natchitoches, Pointe Coupee, Red River, Richland, Sabine, St Helena, St Mary, Tangipahoa, Tensas, Union, Vermilion, Vernon, Washington, West Carroll, West Feliciana, Winn

## Document

Download

Print

"General Decision Number: LA20220004 03/18/2022

Superseded General Decision Number: LA20210004

State: Louisiana

Construction Type: Heavy

Counties: Allen, Assumption, Avoyelles, Beauregard, Bienville, Caldwell, Cameron, Catahoula, Claiborne, Concordia, De Soto, East Carroll, East Feliciana, Evangeline, Franklin, Grant, Iberia, Iberville, Jackson, Jefferson Davis, La Salle, Lincoln, Madison, Morehouse, Natchitoches, Pointe Coupee, Red River, Richland, Sabine, St Helena, St Mary, Tangipahoa, Tensas, Union, Vermilion, Vernon, Washington, West Carroll, West Feliciana and Winn Counties in Louisiana.

HEAVY CONSTRUCTION PROJECTS (includes water wells, water &

ELECTRICIAN.....\$ 26.39 3%+9.42

\* SULA2004-008 05/19/2004

Rates

Fringes

CARPENTER (including  
formsetting/formbuilding).....\$ 14.75 \*\* 0.00

Laborers:

Common.....\$ 7.60 \*\* 0.00

Pipelayer.....\$ 8.47 \*\* 0.00

PIPEFITTER (excluding  
pipelaying).....\$ 18.75 4.05

Power equipment operators:

Backhoe/Excavator.....\$ 11.67 \*\* 0.00

Boring Machine.....\$ 10.25 \*\* 0.00

Bulldozer.....\$ 11.82 \*\* 0.00

Crane.....\$ 13.60 \*\* 0.00

Dragline.....\$ 13.12 \*\* 0.00

Front End Loader.....\$ 9.93 \*\* 0.00

Mechanic.....\$ 12.50 \*\* 0.00

Trackhoe.....\$ 11.99 \*\* 0.00

Tractor.....\$ 10.43 \*\* 0.00

Water Well Driller.....\$ 10.73 \*\* 2.01

Truck drivers:

Dump.....\$ 10.00 \*\* 0.00

Water.....\$ 8.00 \*\* 0.00

WELDERS - Receive rate prescribed for craft performing  
operation to which welding is incidental.

\*\* Workers in this classification may be entitled to a higher  
minimum wage under Executive Order 14026 (\$15.00) or 13658  
(\$11.25). Please see the Note at the top of the wage  
determination for more information.

Note: Executive Order (EO) 13706, Establishing Paid Sick Leave  
for Federal Contractors applies to all contracts subject to the  
Davis-Bacon Act for which the contract is awarded (and any  
solicitation was issued) on or after January 1, 2017. If this  
contract is covered by the EO, the contractor must provide  
employees with 1 hour of paid sick leave for every 30 hours

# *Types of Wage Decision*

**Building:** the construction of sheltered enclosures with walk-in access for the purpose of housing persons, machinery, equipment, or supplies.

- Structures, the installation of utilities, and the installation of equipment above and below the grade level, as well as incidental grading and paving

**Highway:** The construction, alteration, or repair of roads, streets, highways, runways, taxiways, alleys, trails, paths, parking areas, and other similar projects that are not incidental to building or heavy construction (streets and LLO projects)

**Heavy:** The construction on projects that cannot be classified as building, residential, or highway (sewer and water projects)

**Residential:** The construction, alteration, or repair of single-family houses or apartment building of no more than four stories in height.

*Side note: Demolition does not follow DBA or DBRA because there's no type of construction happening*

<https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/memo-131.pdf> - this link will bring you to an even more specific breakdown of wage decisions

# *Obtaining a Wage Decision*

Things to consider:

- Decision type (building highway, heavy or residential)
- Project location
- Special characteristics of the project
- The possibility that more than one may apply

If you want further guidance on how to pick the right wage decision, you can submit an Initial Wage Decision Request (Exhibit B-3 in the Handbook)

DOL's website (<https://sam.gov/content/wage-determinations>) also has guidance on choosing the proper wage decision and lets you download it as well

# *Helpers, Apprentices, and Trainees*

**Helpers:** this classification cannot be listed on an LCDBG payroll because it is not found on any of the Louisiana wage decisions.

- If a person were listed to be working as a worker, Davis-Bacon would require such a person to be classified and paid at the minimum wage of a mechanic or laborer, depending on the type of work they are doing

**Apprentices:** permitted to work at less than the wage for their craft when they are employed and individually registered in a bona fide apprentice program registered within the DOL, Bureau of Apprenticeship and Training

- Their apprenticeship papers with the first payroll on which that worker appears would need to be submitted to OCD

**Trainees:** permitted to work at less than the predetermined rate for their craft if they are employed and individually registered in a program that has received prior approval through formal certification by DOL.

- These papers must be submitted by the contractor with the first payroll on which the worker appears



# *Excessive Use of the “Laborer” Classification*

- Contractors must not be allowed the excessive use of the “laborer” classification on Davis-Bacon covered projects.
- Since “laborer” is often the lowest paid classification on a wage decision, a contractor might classify workers as laborers with the knowledge that such workers will actually perform some mechanic work
- Payrolls must reflect a reasonable distribution of laborers to mechanics based on the types of work inherent to completing the project.

# *Ten Day Rule*

The DOL updates their prevailing wage decisions pretty regularly. To avoid having bidders take into consideration the constantly changing rates, DOL allows the wage decision in effect 10 days before bid opening to be effective for the duration of the construction if contract is awarded within 90 days of the bid opening date.

- If more than 90 days pass, the wage decision in effect on the date of the contract award becomes the “effective” wage decision and the “lock-in” date becomes the date of contract award

The “ten-day call” is an optional form that the local government may use to determine whether a wage decision has been updated since the bid package was prepared.



# *Fringe Benefits*

Fringe benefits are amounts paid to a receiving institution on behalf of the worker

- These can sometimes be confused with deductions
  - Ex: health insurance provided by the employer is a fringe benefit, but health insurance chosen by the employee and paid for by amounts subtracted from the employee's gross wages would be a deduction

If a wage decision contains fringes for a classification utilized by a construction contractor, box 4a or 4b of the payroll form must be marked to indicate the method of fringe benefit payment

If no classifications with fringes were used, then those boxes can be left blank

# Fringe Benefits

Date _____	
I, _____ (Name of Signatory Party)	_____ (Title)
do hereby state:	
(1) That I pay or supervise the payment of the persons employed by _____ on the _____ (Contractor or Subcontractor); that during the payroll period commencing on the _____ (Building or Work) day of _____, _____, and ending the _____ day of _____, _____	
all persons employed on said project have been paid the full weekly wages earned, that no rebates have been or will be made either directly or indirectly to or on behalf of said _____ (Contractor or Subcontractor) from the full weekly wages earned by any person and that no deductions have been made either directly or indirectly from the full wages earned by any person, other than permissible deductions as defined in Regulations, Part 3 (29 C.F.R. Subtitle A), issued by the Secretary of Labor under the Copeland Act, as amended (48 Stat. 948, 63 Stat. 108, 72 Stat. 967; 76 Stat. 357; 40 U.S.C. § 3145), and described below:	
_____ _____ _____ _____ _____	
(2) That any payrolls otherwise under this contract required to be submitted for the above period are correct and complete; that the wage rates for laborers or mechanics contained therein are not less than the applicable wage rates contained in any wage determination incorporated into the contract; that the classifications set forth therein for each laborer or mechanic conform with the work he performed.	
(3) That any apprentices employed in the above period are duly registered in a bona fide apprenticeship program registered with a State apprenticeship agency recognized by the Bureau of Apprenticeship and Training, United States Department of Labor, or if no such recognized agency exists in a State, are registered with the Bureau of Apprenticeship and Training, United States Department of Labor.	
(4) That:	
(a) WHERE FRINGE BENEFITS ARE PAID TO APPROVED PLANS, FUNDS, OR PROGRAMS	(b) WHERE FRINGE BENEFITS ARE PAID IN CASH
<input type="checkbox"/> -	<input type="checkbox"/> -
in addition to the basic hourly wage rates paid to each laborer or mechanic listed in the above referenced payroll, payments of fringe benefits as listed in the contract have been or will be made to appropriate programs for the benefit of such employees, except as noted in section 4(c) below.	Each laborer or mechanic listed in the above referenced payroll has been paid, as indicated on the payroll, an amount not less than the sum of the applicable basic hourly wage rate plus the amount of the required fringe benefits as listed in the contract, except as noted in section 4(c) below.
(c) EXCEPTIONS	
EXCEPTION (CRAFT)	EXPLANATION
REMARKS:	
Signatory Authority?	
NAME AND TITLE	SIGNATURE
THE WILLFUL FALSIFICATION OF ANY OF THE ABOVE STATEMENTS MAY SUBJECT THE CONTRACTOR OR SUBCONTRACTOR TO CIVIL OR CRIMINAL PROSECUTION. SEE SECTION 1901 OF TITLE 18 AND SECTION 231 OF TITLE 31 OF THE UNITED STATES CODE.	

# *Use of Force Account Labor*

Exhibit B-10 explains required record keeping for force account work.

Prior approval needs to be obtained before using force accounts.

- This refers to the use of laborers or mechanics who are employed by the local government, which serves as a contractor for the LCDBG project. In such cases, the contractor (local government) does not have to pay the DBA wage rates.

# *Verification Of Wage Decision & Contractor Eligibility Form (Exhibit B-4)*

Prior to the award of a construction contract to any prime contractor, the local government must obtain verification of the wage decision choice and contractor eligibility.

- This form must be sent to this office for review. After review, it will be sent back with revisions or approval.
- If a determination is made that the wage decision choice was incorrect, the lowest responsive and responsible bidder must agree in writing to incorporate the proper decision.

The UEI number must be active on Sam.gov before work begins on the project

We also should be notified if any subcontractors get put onto the project (we do not clear subcontractors)

Clearance of Consulting and Engineering Firms:

- Any firms that have not worked with our office in the last five years or who are new to the LCDBG program ***must be cleared***.
- The form is very similar to this (Exhibit D-15; Verification of Professional Services Eligibility), it just doesn't include the information about the wage decisions

## Verification of Wage Decision(s) & Contractor Eligibility

**Please Note:** Verifications must be obtained prior to award of contract

1.	Grantee Name		
2.	LCDBG Contract Number		
3.	Parish		
4.	Bid Opening Date		
5.	Description of work covered by the bid package		
<ul style="list-style-type: none"> <li>Identification of wage decision(s) made part of the bid package whether by initial inclusion in bid document or by addendum. Example: LA 08 0014, Mod 0, 2/8/08</li> </ul>			
6.	Decision Number(s)		
7.	Modification Number(s)		
8.	Issue Date(s)		
<ul style="list-style-type: none"> <li>Identification of the prime contractor and principals of the firm.</li> </ul>			
9.	Prime Contractor Name		
10.	Address		
11.	City		
12.	State		
13.	Zip Code		
14.	Contractor Phone Number		
15.	Unique Entity ID (UEI) Number		
16.	Enter the name of each principal below	Enter the title of each principal	
17.			
18.			
19.			
20.	Anticipated Number of Subcontractors:	UEI Number of Subcontractor(s)	
21.			
22.			
23.	Grantee's Labor Compliance Officer (Signature or name)		
24.	Upon verification send to: (email address or fax #)		
25.	Date of this request		
<ul style="list-style-type: none"> <li>State Use Only: Initials &amp; dates below indicate verification by OCD</li> </ul>			
26.	Wage decision(s) above verified by (Signature, date) (Valid only if awarded within 90 days of bid opening)		
27.	Prime contractor's eligibility verified (Signature, date)		
28.	Verification is hereby sent to (Name of Person)		

# *Notice of Contract Award and Preconstruction Conference*

- This form must be reviewed by our office within 30 days after awarding the contract (Exhibit B-5 in Grantee Handbook).
  - The local government must also submit a *Certified and Itemized Bid Tabulation*, which is a listing of bidders and bid amounts for the project.

This office requires that the local government holds a preconstruction conference with the prime and all available subcontractors prior to the start of construction, at which time they will be advised of their responsibilities and obligations concerning labor standards and UEI number requirements.



**B-5: NOTICE OF CONTRACT AWARD**

LGR: \_\_\_\_\_ File: \_\_\_\_\_ FY \_\_\_\_\_ Labor

---

**Notice of Contract Award**

---

Date Received by State \_\_\_\_\_

- *Louisiana law, LA RS 38:2215, requires mutual written agreement between the parties if the time between the bid opening and contract award exceeds 45 days.*
- *If more than 90 days transpire between bid opening and contract award date, ensure that the wage decision(s) in effect on the contract award date becomes a written part of the construction contract.*
- *Send this Notice to OCD within 30 days of the contract award date.*

**1. The LCDBG Contract:**

Grantee Name \_\_\_\_\_

LCDBG Contract # \_\_\_\_\_

**2. A prime construction contract has been awarded as follows:**

Name of prime contractor \_\_\_\_\_

Type of work to be done \_\_\_\_\_

Bid Opening Date \_\_\_\_\_

Date of contract award \_\_\_\_\_

Estimated date of start of construction \_\_\_\_\_

**3. Components of the above listed contract identified by source, purpose and amount:**

<u>Source</u>	<u>Purpose</u>	<u>Amount</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

**4. Total Amount of Contract Award (All funds—Local, LCDBG, etc.)**5. A copy of the certified and itemized bid tabulation is attached: Yes ☐ No ☐

Please do not attach unrequested documents such as: minutes of bid opening, list of attendees, LA Uniform Public work bid form, or resolution to award the contract.

**6. Comments:** \_\_\_\_\_

7. Signed: \_\_\_\_\_

Signature of Grantee's CEO

8. Date: \_\_\_\_\_

# *Additional Classifications*

A wage decision will state the minimum hourly pay and fringe benefits that must be paid to specific classes of workers such as carpenters, electricians, and backhoe operators. If it is found that a class of laborers or mechanics not listed in the decision will be employed on the project, the contractor must request an additional classification

- A construction contractor will often know immediately whether additional classifications will be needed, so this process can begin mobilization or hiring of workers

**\*\*\*\**RECENTLY UPDATED - FORM THAT SHOULD  
BE USED IS SF-1444 per HUD***



REQUEST FOR AUTHORIZATION OF  
ADDITIONAL CLASSIFICATION AND RATE

CHECK APPROPRIATE BOX  
☐ SERVICE CONTRACT  
☐ CONSTRUCTION CONTRACT

OMB Control Number: 9000-0066  
Expiration Date: 5/31/2025

Paperwork Reduction Act Statement - This information collection meets the requirements of 44 U.S.C. § 3507, as amended by section 2 of the Paperwork Reduction Act of 1995. You do not need to answer these questions unless we display a valid Office of Management and Budget (OMB) control number. The OMB control number for this collection is 9000-0066. We estimate that it will take .5 hours to read the instructions, gather the facts, and answer the questions. Send only comments relating to our time estimate, including suggestions for reducing this burden, or any other aspects of this collection of information to: U.S. General Services Administration, Regulatory Secretariat Division (M1J1CB), 1800 F Street, NW, Washington, DC 20405.

INSTRUCTIONS: THE CONTRACTOR SHALL COMPLETE ITEMS 3 THROUGH 16, KEEP A PENDING COPY, AND SUBMIT THE REQUEST, IN QUADRUPPLICATE, TO THE CONTRACTING OFFICER.

1. 10.

ADMINISTRATOR,  
WAGE AND HOUR DIVISION  
U.S. DEPARTMENT OF LABOR  
WASHINGTON, DC 20210

2. FROM: (REPORTING OFFICE)

**5. CONCLUSION**

4. DATE OF RESOURCES

5. CONTRACT NUMBER

6. DATE BID OPENED (SEALED BIDDING)

7. DATE OF AWARD

8. DATE CONTRACT WORK STARTED	
----------------------------------	--

9. DATE OPTION EXERCISED (IF APPLICABLE) (SERVICE CONTRACT ONLY)

10. SUBCONTRACTOR IF ANY:

11. PROJECT AND DESCRIPTION OF WORK (ATTACH ADDITIONAL SHEET IF NEEDED)

12. LOCATION (CITY, COUNTY, AND STATE)

13. IN ORDER TO COMPLETE THE WORK PROVIDED FOR UNDER THE ABOVE CONTRACT, IT IS NECESSARY TO ESTABLISH THE FOLLOWING RATE(S) FOR THE INDICATED CLASSIFICATION(S) NOT INCLUDED IN THE DEPARTMENT OF LABOR DETERMINATION

NUMBER:

DATED:

a. LIST IN ORDER, PROPOSED CLASSIFICATION TITLE(S), JOB DESCRIPTION(S), DUTIES, AND RATIONALE FOR PROPOSED CLASSIFICATIONS (Service contracts only)

(Use reverse or attach additional sheets, if necessary)

b. WAGE RATE (\$)

### c. FRINGE BENEFITS PAYMENTS

14. SIGNATURE AND TITLE OF SUBCONTRACTOR REPRESENTATIVE  
(IF ANY)

15. SIGNATURE AND TITLE OF PRIME CONTRACTOR REPRESENTATIVE

16. SIGNATURE OF EMPLOYEE OR REPRESENTATIVE

[illegible]

CHECK APPROPRIATE BOX-REFERENCING BLOCK 13

☐ **AGREE**☐ **DISAGREE**

TO BE COMPLETED BY CONTRACTING OFFICER (CHECK AS APPROPRIATE - SEE FAR 22.1019 (SERVICE CONTRACT LABOR STANDARDS) OR FAR 22.406-3 (CONSTRUCTION WAGE RATE REQUIREMENTS))

☐ THE INTERESTED PARTIES AGREE AND THE CONTRACTING OFFICER RECOMMENDS APPROVAL BY THE WAGE AND HOUR DIVISION. AVAILABLE INFORMATION AND RECOMMENDATIONS ARE ATTACHED.

☐ THE INTERESTED PARTIES CANNOT AGREE ON THE PROPOSED CLASSIFICATION AND WAGE RATE. A DETERMINATION OF THE QUESTION BY THE WAGE AND HOUR DIVISION IS THEREFORE REQUESTED. AVAILABLE INFORMATION AND RECOMMENDATIONS ARE ATTACHED.

(Send 2 copies to the Department of Labor)

SIGNATURE OF CONTRACTING OFFICER OR REPRESENTATIVE

TITLE AND COMMERCIAL TELEPHONE NUMBER

DATE SUBMITTED

AUTHORIZED FOR LOCAL REPRODUCTION  
PREVIOUS EDITION IS USABLE

STANDARD FORM 1444 (REV. 4/2013)  
Prescribed by GSA-FAR (48 CFR) 53.222(f)

# *Employee Interviews*

During the course of construction, the local government must conduct interviews of workers to help determine payroll accuracy and compliance with DBA (Exhibit B-9)

- Minimum requirements:
  - All prime contractors
  - Subcontractors whose award is \$100,000 or more
  - Any subcontractor where there are a large number of payroll problems

When an interview session is conducted, at least 50% of the laborers and at least one worker of each of the remaining classifications present on the jobsite that day must be interviewed

- This includes truck drivers and other classifications who may not spend all day on the jobsite
- If you have to go back and get interviews for certain individuals who were not present when you were there, you do not have to start over.

# Record of Employee Interview

## U.S. Department of Housing and Urban Development Office of Davis-Bacon and Labor Standards

OMB Approval No. 2501-0009

(exp. 12/31/2024)

The public reporting burden estimate for this collection of information is 15 minutes per response on average. This includes reviewing instructions, searching existing data sources, gathering, and maintaining the data, and completing the collection of information. This information may not be collected, nor are you required to provide, the information requested unless it displays a currently valid OMB control number. The information collected ensures compliance with the Federal labor standards through recording interviews with construction workers. The information collected assists HUD in compliance monitoring of Federal labor standards. Any information collected is covered by the Privacy Act of 1974 and by 29 CFR 5.6(a)(5). Individuals and agencies collecting this information must maintain these records in a manner that protects the individuals on whom the information is maintained. The information collected herein is voluntary, and any information provided shall be kept confidential, but failure to provide the information collected may delay enforcement of any possible Federal labor standards violations if the information would have identified any. Comments concerning this burden statement, or this collection should be sent to: National Director, Office of Davis-Bacon and Labor Standards, 451 7th Street SW, Room 7108, Washington, DC 20410. When providing comments, please refer to OMB Approval 2501-0009.

Pursuant to 5 U.S.C. § 552a(e)(3), this Privacy Act Statement serves to inform you of the following concerning the collection of the information on this form.

**A. AUTHORITY:** Collection of the information solicited on this form is authorized by the Davis-Bacon Act as promulgated through Department of Labor Regulations under 29 CFR Part 5.

**B. PURPOSE:** The primary purpose for soliciting this information is to determine if the wages paid by an employer on a project covered by the Davis-Bacon Act are in compliance with federal labor standards.

**C. ROUTINE USES:** The information collected ensures compliance with the Federal labor standards through recording interviews with construction workers on topics related to wages paid on the project. The information is reviewed by HUD authorized personnel to ensure compliance with Federal labor standards under the Davis-Bacon Act on covered projects. If violations are found, the information collected is used to conduct enforcement actions to ensure restitution is paid to workers of covered projects are paid proper wages under the Davis-Bacon Act.

**D. CONSEQUENCES OF FAILURE TO PROVIDE INFORMATION:** The information collection is voluntary. Refusing to give information will not impact your status with your employer or the government. Failure to provide the information will limit the ability of HUD to determine if you were paid proper wages under the Davis-Bacon Act, and will limit the ability for HUD to seek restitution for you in the event a violation is found.

1a. Project Name			2a. Employee Name		
1b. Project Number			2b. Employee Phone Number (including area code)		
1c. Contractor or Subcontractor (Employer)			2c. Employee Home Address & Zip Code		
			2d. Verification of identification? Yes <input type="checkbox"/> No <input type="checkbox"/>		
3a. How long on this job?	3b. Last date on this job before today?	3c. No. of hours last day on this job?	4a. Hourly rate of pay?	4b. Fringe Benefits? Vacation Yes <input type="checkbox"/> No <input type="checkbox"/> Medical Yes <input type="checkbox"/> No <input type="checkbox"/> Pension Yes <input type="checkbox"/> No <input type="checkbox"/>	4c. Pay stub? Yes <input type="checkbox"/> No <input type="checkbox"/>
5. Your job classification(s) (list all) --- continue in block 18 if necessary					
6. Your duties --- continue in block 18 if necessary					
7. Tools or equipment used --- continue in block 18 if necessary					
8. Are you an apprentice or trainee? Yes <input type="checkbox"/> No <input type="checkbox"/>			10. Are you paid at least time and 1/2 for all hours worked in excess of 40 in a week? Yes <input type="checkbox"/> No <input type="checkbox"/>		
9. Are you paid for all hours worked? Yes <input type="checkbox"/> No <input type="checkbox"/>			11. Have you ever been threatened or coerced into giving up any part of your pay? Yes <input type="checkbox"/> No <input type="checkbox"/>		
12a. Employee Signature			12b. Date		
13. Duties observed by the Interviewer (Please be specific.)					
14. Remarks --- continue in block 18 if necessary					
15a. Interviewer Name (Please Print)			15b. Signature of Interviewer		15c. Date of Interview
<b>Payroll Examination</b>					
16. Remarks --- continue in block 18 if necessary					
17a. Signature of Payroll Examiner			17b. Date		

# *Corrective Actions Regarding Labor Standards Violations*

## Inadequate Payroll Information

- The local government should be requiring prime contractors to submit weekly payrolls in order for them to be reviewed and possibly revised in a timely manner
- The payroll format in Exhibit B-11 shows the necessary information for payroll reporting and comes from the DOL.
  - Note: alternate forms may be used as long as all the required information on the form is included.
- If the payroll is filled out incorrectly, corrections should be made prior to monitoring (included a corrected payroll and Statement of Compliance)
  - *Handwritten corrections are not allowed!*

# B-11: PAYROLL FORM AND STATEMENT OF COMPLIANCE

U.S. Department of Labor  
Wage and Hour Division

## PAYROLL

For contractor's optional use; see instructions at [dol.gov/agencies/whd/forms/wh347](http://dol.gov/agencies/whd/forms/wh347)

Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number.



NAME OF CONTRACTOR <input type="checkbox"/> OR SUBCONTRACTOR <input type="checkbox"/>		ADDRESS		OMB No. 1235-0008 Expires 09/30/2026
PAYROLL NO.	FOR WEEK ENDING	PROJECT AND LOCATION		PROJECT OR CONTRACT NO.

(1) NAME AND INDIVIDUAL IDENTIFYING NUMBER (e.g., LAST FOUR DIGITS OF SOCIAL SECURITY NUMBER) OF WORKER	(2) IND. OF EXEMPTING EXEMPTIONS	(3) WORK CLASSIFICATION	(4) DAY AND DATE OT O S HOURS WORKED EACH DAY	(5) TOTAL HOURS	(6) RATE OF PAY	(7) GROSS AMOUNT EARNED	(8) DEDUCTIONS					(9) NET WAGES PAID FOR WEEK
							FICA	WITH- HOLDING TAX		OTHER	TOTAL DEDUCTIONS	
			O									
			S									
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While completion of Form WH-347 is optional, it is mandatory for covered contractors and subcontractors performing work on Federally financed or assisted construction contracts to respond to the information collection contained in 29 C.F.R. §§ 3.3, 5.5(a). The Copeland Act (40 U.S.C. § 3145) contractors and subcontractors performing work on Federally financed or assisted construction contracts to "furnish weekly a statement with respect to the wages paid each employee during the preceding week." U.S. Department of Labor (DOL) regulations at 29 C.F.R. § 5.5(a)(3)(ii) require contractors to submit weekly a copy of all payrolls to the Federal agency contracting for or financing the construction project, accompanied by a signed "Statement of Compliance" indicating that the payrolls are correct and complete and that each laborer or mechanic has been paid not less than the proper Davis-Bacon prevailing wage rate for the work performed. DOL and federal contracting agencies receiving this information review the information to determine that employees have received legally required wages and fringe benefits.

### Public Burden Statement

We estimate that it will take an average of 55 minutes to complete this collection, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you have any comments regarding these estimates or any other aspect of this collection, including suggestions for reducing this burden, send them to the Administrator, Wage and Hour Division, U.S. Department of Labor, Room 53502, 200 Constitution Avenue, N.W. Washington, D.C. 20210

# *Three Scenarios of Payroll Review*

## **Scenario One: Error that Requires Restitution**

- Requires restitution due to underpayment of wages. May result from Davis-Bacon violations, CWHSSA overtime violations, or both
- The local government must promptly notify the prime contractor in writing that payment of back wages is required (Exhibit B-14)
  - Should identify the name of the prime and the applicable subcontractor, the underpaid worker(s), the correct job classification and wage rate, dates of underpayment, and the amount of underpayment owed
  - If there OT violations under CWHSSA, the notice to the contractor should also identify a calculation of liquidated damages and inform the contractor to either pay them or request a waiver
- **Certified Correction Payroll:** a payroll that reflects restitution paid under DBA and/or CWHSSA will reflect the corrected payroll amounts and will be designated as a “certified” correction payroll.
  - Payroll problems that require the employer to prepare a Certified Correction Payroll
  - Wage rates on the payroll do not meet DBA
  - Wage rates on the payroll do not meet CWHSSA requirements
  - Worker classifications are incorrect, incomplete, or not in accordance with the applicable wage decision resulting in restitution due
  - Calculations are in error and result in underpayment



# *Three Scenarios of Payroll Review*

**Scenario Two: When restitution will not be due but some type of correction not involving restitution is required.**

- May be used to reclassify workers, correct math errors, clarify monetary amounts, revise improper dating
- Each corrected payroll is for one week only (should be the same weekly number as the original. Ex: Payroll 4 Revision 1)
- Supplementary statements may be obtained from the contractor to clarify not only major issues involving restitution or classification clarifications, but also minor issues that do not involve restitution:
  - The payroll does not have the last four digits of the employee's SSN
  - An incorrect employee name

**Scenario Three: No error detected**

# *Final Wage Compliance Report*

## Final Wage Compliance Report

(Not required for Housing grants)

1. Grantee Name \_\_\_\_\_  
2. LCDBG Contract# \_\_\_\_\_  
3. Fiscal Year of Grant \_\_\_\_\_  
4. Date of this Report \_\_\_\_\_  
5. Report Prepared By \_\_\_\_\_

6. Was there any wage underpayment(s)? \_\_\_\_\_ Yes \_\_\_\_\_ No

7. Listing of any contractors associated with underpayment(s):

Prime contractor (above) Sub(s) to this prime (below)	Prime contractor (above) Subs to this prime (below)	Prime contractor (above) Subs to this prime (below)
_____	_____	_____
_____	_____	_____
_____	_____	_____

8. Are any labor issues unresolved? \_\_\_\_\_ Yes \_\_\_\_\_ No If yes, explain on the line below: \_\_\_\_\_

9. Provide enforcement activity information for each contractor who had underpayment(s) using the format provided in 10-15.

10. Contractor (prime or sub)	11. Type of work	12. # of workers underpaid	13. Restitution under Davis Bacon	14. Restitution under CWHSSA	15. Liquidated Damages collected
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

The last item regarding labor standards, found in Exhibit E-6, must be sent to this office along with other closeout documents.

If there are unresolved labor compliance problems at that time, the OCD Labor Compliance Officer will assist the local government in determining how to fix it



# *Reporting Restitution under Davis-Bacon and CWHSSA*

Restitution reported on the Labor Standards Enforcement Report or the Final Wage Compliance Report must be correctly classified

- DBA: involves the restitution that comes from an underpayment rate for each hour worked at the deficient rate
- CWHSSA: involves the payment of one-half of the hourly deficiency for each overtime hour worked

EX: A laborer worked 48 hours in one workweek. He was paid \$10.00 per hour for 40 hours and \$15.00 per hour for eight hours. The wage decision calls for \$11.00 per hour with no fringe benefits. Most payroll preparers would immediately know that \$52.00 of restitution is due; however, some may not realize the proper classification of each of the components of restitution. The \$52.00 in restitution is properly calculated and classified as follows:

$48 \times \$1.00 = \$48.00$  Davis-Bacon component of restitution

$8 \times \$0.50 = \$4.00$  CWHSSA component of restitution

# *Withholding Funds from Contractor Based on Non-Compliance with Labor Standards*

If violations regarding restitution have not been corrected within 30 calendar days from the day of the first notice of underpayment, the local government may withhold funds due to the prime.

- Only an amount considered necessary to ensure payment of underpaid wages (and Liquidated Damages, if applicable) may be withheld
- The prime must be notified of the withholding and be given the second notice of underpayment
  - The local government must, again, specify the identity of underpaid workers, correct job classifications and wage rates, dates when underpayments occurred, and the amounts of underpayments owed

If OCD determines it appropriate, the local government will be notified to disburse wages owed from the withheld funds to the respective workers.

# *Unfound Workers*

- If all affected workers cannot be located and restitution made either by the contractor directly or through use of withheld funds, enough funds must be reserved to pay those workers the wages owed.
- Efforts should be made to locate workers; however, if they have not been located by the time of closeout, the local government must return the withheld funds to the OCD.
  - A check, made payable to the Louisiana Division of Administration, and a Labor Standards Enforcement Report (Exhibit B-15) covering the remaining withheld funds must be submitted before the grant will be close.

# *Withholding Funds from Grantee Based on Non-Compliance with LCDBG Requirements*

If a Labor Standards violation does occur that results in the local government not being in compliance within the LCDBG program, the OCD may suspend payment on the next “Request for Payment”

- Ex: if the local government fails to ensure the timely submission of contractor payrolls by the prime, then the local government may be considered as being in non-compliance

# *Payroll Retention*

Payroll records must be retained by the local government for a period of four years from the date of the letter indicating “Final Close” of the LCDBG program relative to the construction project.

- These records must be available at all times during the retention period for inspect by representatives of the OCD, HUD, and DOL.

# *Chronological Steps*

1. Obtain a wage decision
2. Prepare bid documents
3. Advertise for bids
4. Ten day responsibility (10dc no longer required)
5. Bid opening
6. Verification of contractor eligibility (Revised to Include Subs)
7. Award contract
8. Notice of contract award
9. Preconstruction conference (Required)
10. Additional classifications
11. Employee interviews
12. Examinations of payrolls (must stay current to ensure compliance of contractors before they leave the site)
13. Corrective actions (if applicable) such as restitution and liquidated damages
14. Labor Standards Enforcement Report
15. Monitoring by OCD-LGA staff
16. Corrective action to address findings of deficiency
17. Final Wage Compliance Report



# Monitoring, Closeout, and Program Amendments

Presented by: Janelle Dickey



# Desktop Review

OCD staff will send a letter requesting documents when the grant is 25% expended.

Grantees will have 30 days to submit requested documents.

## REQUIRED DOCUMENTATION

1. Documentation of ownership of grantee-owned property involved with this project. If property was acquired (including parcels, servitudes, leases, and right-of-way), proper documentation will be monitored during the on-site monitoring visit.
2. Citizen Participation Plan, with the corresponding complaint procedure, along with the resolution adopting the Plan.
3. Roster of those in attendance, as well as the minutes, for the first public hearing.
4. *Summary of Previous Actions taken to Achieve Compliance with Section 504*. If a *Summary* is not available, please submit a copy of the self-evaluation of current policies and practices with respect to communications, employment, and program/physical accessibility to determine whether, in whole or in part, they do not or may not meet the requirements of being accessible to individuals with disabilities.
5. Language Access Plan (LAP), which should have been prepared within the first year from the Authorization to Incur Costs date of the grant. Also include the resolution adopting the LAP and any reviews or updates that were made to the Plan.
6. ~~Executed Fair Housing Assessment.~~
7. Project wage sheet.
8. Pictures of project sign in target area and labor posters.
9. Chart of Accounts relative to the current LCDBG project.
10. Proof of current bonding or other insurance for all individuals listed on the Financial Management Questionnaire as authorized to sign checks.



# Local Government Questionnaire - Exhibit E-5

## E-5: LOCAL GOVERNMENT QUESTIONNAIRE

### Local Government Questionnaire

This questionnaire must be completed in its entirety and returned with the information requested. It must be signed by the chief elected official.

	Question	Yes	No	N/A
1.	At this time, has a person or business been displaced as a result of this program? (If yes, contact OCD-LGA immediately)			
2.	Is it anticipated that any person or business will be displaced as a result of this program? (If yes, contact OCD-LGA immediately)			
3.	Does your local government operate a 24-hour emergency service?			
	• If yes, does your local government use a functioning TDD?			
4.	If your local government does not have a functioning TDD, does it utilize the LA Relay Service?			
	• A copy of the newspaper advertisement of the published telephone numbers within six months of the Authorization to Incur Costs letter date must be returned with this questionnaire.			
5.	Does the local government have any disabled employees?			
	• If yes, provide the policy stating that reasonable accommodations, such as restructuring/relocating job, modifying schedule, acquiring or modifying equipment, providing reader/interpreter, are made.			
6.	Does your local government's operating unit have 15 or more employees?			
	• If yes, has the local government taken appropriate initial and continuing steps to notify "participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, and unions or professional organizations holding collective bargaining or professional agreements with the grantee" that it does not discriminate on the basis of disability in violation of this part?			
	○ If yes, did the grantee make the initial notification required within 90 days of receipt of the executed contract with the State for each new grant?			
	○ If yes, documentation of initial and continuing notifications must be returned with this questionnaire.			
7.	Has your local government acquired an "existing" facility (construction prior to July 11, 1988) that is not accessible and will renovate it prior to occupying it?			
8.	Has the U.S. Justice Department required your local government to make a facility physically accessible?			

# Desktop Review - Exhibit E-4

## E-4: DESKTOP REVIEW CHECKLISTS

Desktop Review	
<b>General Information</b>	Grantee: _____ Contract Number: _____ Grant Program Year: _____ Grant Type [PF, HO, ED, DN, LS]: _____ Entity [Village, City, Town, Parish]: _____
<b>Contacts</b>	Chief Elected Official: _____ Consultant: _____ Engineer: _____ LGR: _____
<b>Dates</b>	Date of Application: _____ Authorization to Incur Costs: _____ Transmittal of Contract: _____ Consultant Cleared: _____ Engineer Cleared: _____ Consultant Contract: _____ Engineer Contract: _____ CDBG Contract Ends: _____ Desktop Review Letter Sent: _____
<b>Amounts/Activities/Nat'l Objective</b>	Grant Award Amount: _____ Percent Drawn to Date: _____ Local Funds: _____ Other Funds: _____ <b>Activity:</b> National Objective: _____ ORIGINAL Budgeted Amount for Activity: _____ Most recent REVISED Budgeted Amount for Activity: _____ Expenditures to Date: _____ <b>Activity:</b> National Objective: _____ ORIGINAL Budgeted Amount for Activity: _____ Most recent REVISED Budgeted Amount for Activity: _____ Expenditures to Date: _____ <b>Activity:</b> National Objective: _____ ORIGINAL Budgeted Amount for Activity: _____ Most recent REVISED Budgeted Amount for Activity: _____ Expenditures to Date: _____ <b>Activity:</b> National Objective: _____ ORIGINAL Budgeted Amount for Activity: _____ Most recent REVISED Budgeted Amount for Activity: _____ Expenditures to Date: _____ Grant Award (ORIGINAL BUDGET): \$0.00 Grant Award (REVISED BUDGET): \$0.00 Total Expenditures to Date: \$0.00

E-3: ON-SITE MONITORING CHECKLISTS				
Monitoring Preparation Checklist (pages 1-4)		Updated: July 2022		
<b>General Information</b>		Grantee:		
		Contract Number:		
		Grant Program Year:		
		Grant Type [PF, HO, ED, DN, LS]:		
		Entity [Village, City, Town, Parish]:		
<b>Contacts</b>		Chief Elected Official:		
		Consultant:		
		Engineer:		
		LGR:		
<b>Dates</b>		Date of Application:		
		Authorization to Incur Costs:		
		Transmittal of Contract:		
		Consultant Cleared:		
		Engineer Cleared:		
		Consultant Contract:		
		Engineer Contract:		
		CDBG Contract Ends:		
		Monitoring Visit:		
<b>Amounts/Activities/Nat'l Objective</b>		Grant Award Amount:		
		Percent Drawn to Date:		
		Local Funds:		
		Other Funds:		
		<b>Activity:</b>		
		National Objective:		
		ORIGINAL Budgeted Amount for Activity:		
		Most recent REVISED Budgeted Amount for Activity:		
		Expenditures to Date:		
		<b>Activity:</b>		
		National Objective:		
		ORIGINAL Budgeted Amount for Activity:		
		Most recent REVISED Budgeted Amount for Activity:		
		Expenditures to Date:		
		<b>Activity:</b>		
		National Objective:		
		ORIGINAL Budgeted Amount for Activity:		
		Most recent REVISED Budgeted Amount for Activity:		
		Expenditures to Date:		
		<b>Activity:</b>		
		National Objective:		
		ORIGINAL Budgeted Amount for Activity:		
		Most recent REVISED Budgeted Amount for Activity:		
		Expenditures to Date:		
		Grant Award (ORIGINAL BUDGET):		
		Grant Award (REVISED BUDGET):		
		Total Expenditures to Date:		
<b>Acquisition</b>		Yes	No	N/A
1. Did application include acquisition by purchase or donation?				
<b>Anti-Displacement</b>		Yes	No	N/A
2. Does plan identify a person who is responsible for displacement and relocation compliance?				
~ If Yes, note name of contact person:				
3. Was a person or business displaced as a result of this program?				
~ If Yes, print Part 2 of the Checklist.				
<b>Financial</b>		Yes	No	N/A
6. Does grantee have more than one open CDBG grant?				
10. Date 1st administration invoice:		Period covered:		
Date 1st construction invoice:		Period covered:		

# *Closeout – beginning on page E-2*

In order to receive a Conditional Closeout...

- Improvements/construction undertaken with grant funds must be in full operation
- Submit 1 copy of the Program Completion Report
- Submit 3 copies of the Certificate of Completion (must be original signatures)
- Submit Clear Lien Certificate
- All findings of deficiency must be cleared

# *Program Completion Report - Exhibit E-6*

## PROGRAM COMPLETION REPORT COVER SHEET

---

1. Name of Grantee                      2. Address of Grantee

---

3. Contract Number

---

4. Citizen participation information submitted with this report includes the following:

- a) A summary of each citizen comment received during program implementation, the grantee assessment of the comment, and a description of actions taken or to be taken in response to the comment.
- b) Specific information on each required public hearing held which includes the purpose of the public hearing and the date(s) of each; and a copy of the public notice, attendance roster, and minutes of the public hearing on performance.

---

5. The grantee's chief elected official certifies that:

- a) To the best of his/her knowledge and belief the data in this report is true and correct as of the



# *Program Completion Report*

## **CITIZEN PARTICIPATION INFORMATION**

Attach the citizen participation information as identified and required. As a reminder, public hearings are required: a) for the development of the LCDBG application, b) for comments regarding any amendments to the Program, and c) for review of the grantee's program performance as a part of closeout. Identify the date and purpose of each public hearing. Also include a summary of each comment received during the program and the local government's response to each comment received. These comments must also include any complaints received regarding the program.

# Grant Progress Form

LOUISIANA COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAMM  
GRANT PROGRESS FORM

1. Grantee

2. Contract Number:

3. Name of Activity	4. National Objective Addressed	5. Actions Accomplished	6. Actions Remaining to be completed and Anticipated Completion Date	7.* Current LCDBG Budget	8.* LCDBG Funds Obligated	9.* LCDBG Funds Expended
			10. TOTAL	\$	\$	\$

\*If other funds were injected into the project, attach a separate sheet identifying the amount of, source of, and use of funds for each activity. This is required for all economic development projects; however, it may also pertain, to housing, public facilities, demonstrated needs, or other types of projects. The amounts shown in columns 7, 8, and 9 should involve only LCDBG funds.



# Miscellaneous Information Form

LOUISIANA COMMUNITY DEVELOPMENT  BLOCK GRANT PROGRAM MISCELLANEOUS INFORMATION FORM	1. GRANTEE:  2. Contract
--	--------------------------------

3. Did the grantee receive any program income during the course of this grant? Yes\_\_\_\_\_No\_\_\_\_\_ (See the instructions on the back of this form.)

4. If yes,

a. Enter the sum of program income received during this program \$\_\_\_\_\_

b. For all program income received, list separately the source and original LCDBG Program year which generated the program income and the amount received.

<u>SOURCE</u>	<u>ORIGINAL LCDBG PROGRAM YEAR</u>	<u>AMOUNT</u>
---------------	--	---------------

---

5. Was any property or equipment (property having a useful life of more than one year and an acquisition cost of \$300 or more per unit) purchased with LCDBG funds? Yes\_\_\_\_\_No \_\_\_\_\_

If yes, provide a description and dollar amount paid for such purchases.

<u>DESCRIPTION</u>	<u>AMOUNT</u>
--------------------	---------------

Disposition of property acquired with federal funds must be in compliance with OMB Circular A-87. Notification will be provided for the proper procedures for disposition of the property described above.

---

6. Was any land acquired/donated in order to complete the project?

Yes\_\_\_\_\_No \_\_\_\_\_

If yes, identify the number of parcels donated\_\_\_\_\_and acquired\_\_\_\_\_.  
(number)(number)

---

7. Has or will the local government transfer ownership of the system/asset to another entity?

Yes\_\_\_\_\_No \_\_\_\_\_

If yes, a copy of the executed intergovernmental cooperative agreement must be attached to the closeout documents.

---

8. If the project included infrastructure construction, a copy of the recorded clear lien certificate must be submitted with the closeout documents.

---

9. If the project involved infrastructure construction which was subject to Davis Bacon and Related Acts, a Final Wage Compliance Report must be submitted.

# Certificate of Completion

## Louisiana Community Development Block Grant Program

### CERTIFICATE OF COMPLETION

### FINAL STATEMENT OF COSTS

1. Grantee:
2. Contract Number:

Program Activity Categories	3. Paid Costs	4. Unpaid Costs	5. Total Grant Costs	6. State Use Only
A. Acquisition of Real Property	\$	\$	\$	\$
B. Public Works, Facilities, Site Imp.				
1. Sewer				
2. Streets				
3. Water (Fire Protection)				
4. Water (Potable)				
5. Multi-purpose Community Centers				
6. Other				
C. Rehabilitation Housing				
D. Rehabilitation Administration				
E. Clearance, Demolition				
F. Relocation Payments				
G. Economic Development				
1. Commercial/Industrial Infrastructure Development				
2. Loan				
3. Other				
H. Planning and Management Development				
I. Administration				
1. Pre-Agreement Costs				
2. Public Facilities, Housing & Economic Development				
J. Other				
K. Other				
L. TOTAL GRANT COST				
M. Prog. Income Applied to Prog.Cost				

### COMPUTATION OF GRANT BALANCE

Description	To be completed by Grantee	State Use Only
	7. Amount	8. Approved Amount
A. Total Grant. Cost	\$	\$
B. Unsettled third party claims		
C. Subtotal		
D. Grant amount as per contract		
E. Unutilized Grant		
F. Grant Funds Received		
G. Balance of Grant Payable		

# Certificate of Completion

9. List any unpaid costs and unsettled third-party claims against the LCDBG Program. Describe circumstances and dollar amounts involved.

☐

Check if continued on additional sheet and attach.

---

## CERTIFICATION OF RECIPIENT

It is hereby certified that all activities undertaken by the recipient with funds provided under the contract identified hereof, have, to the best of my knowledge, been carried out in accordance with the contract; that proper provision has been made by the recipient for the payment of all unpaid costs and unsettled third-party claims identified hereof; that the State of Louisiana is under no obligation to make any further payment to the recipient under the contract in excess of the amount identified in line 7.C. hereof, and that every statement and amount set forth in this instrument is, to the best of my knowledge, true and correct as of this date.

---

10. Date

11. Typed Name and Title of Recipient's  
Chief Elected Official

12. Signature of Recipient's  
Chief Elected Official

---

## LCDBG APPROVAL

13. This Certificate of Completion is hereby approved. Therefore, I authorize cancellation of the unutilized contract commitment and related funds reservation and obligation of \$  less \$  previously authorized for cancellation. (from Line 7.E.)

Date

Typed Name and Title of State  
Authorized Official

---

Signature of State's  
Authorized Official

Traci M. Watts  
Director, Louisiana Community  
Development Block Grant Program

CLOSEOUTS

# Final Wage Compliance Report

## Final Wage Compliance Report

(Not required for Single-Family Housing grants)

1. GranteeName

2. LCDBG Contract#

3. Fiscal Year of Grant

4. Date of thisReport

5. Report Prepared By

6. Was there any wage underpayment(s)?

☐

Yes

☐

No

7. Listing of any contractors associated with underpayment(s):

Prime contractor (above)

Prime contractor (above)

Prime contractor (above)

Sub(s) to this prime (below)

Subs to this prime (below)

Subs to this prime (below)

8. Are any labor issues unresolved?

Yes

☐

No

☐

If yes, explain below:

9. Provide enforcement activity information for each contractor who had underpayment(s) using the format provided in 10-15.

10. Contractor (prime or sub)	11. Type of work	12. # of workers underpaid	13. Restitution under Davis Bacon	14. Restitution under CWHSSA	15. Liquidated Damages collected

# *Closeout*

In order to receive a Final Closeout:

- All conditions must be met in order to be approved for a Conditional Closeout
- All financial reports/audits covering the expenditure of all LCDBG funds have been received and accepted.

# Program Amendments

## Pages A-3, A-47

- Required for single or cumulative changes to the program budget greater than 10% of the grant award amount, changes that result in the deletion or addition of an activity or item, or changes to the scope of work or that would affect the original rating of the application
- Must be submitted by the Grantee

# Program Amendments

## Pages A-3, A-47

- Funds remaining due to cost underruns may be used with prior approval by OCD-LGA through a Request for Program Amendment
- Project must continue to be fundable based on the proposed changes to be approved and NOT require an amendment to the ERR

# Program Amendment Exhibit A-32

## A-32: LCDBG REQUEST FOR PROGRAM AMENDMENT (Page 1 of 2)

1. Grantee Name:				2. Contact Person's Name:								5. Program Amendment Number:			
3. Contract Number:		4. Date:		Phone Number:											
Name of Activity	Approved Work To Be Completed	Proposed Work To Be Completed	Reasons For Change	Extremely Low/Low/Moderate Income Beneficiaries				Minority Beneficiaries				Total Beneficiaries			
				Original/Current		Revised		Original/Current		Revised		Original/Current		Revised	
6	7	8	9	10				11				12			
				#	%	#	%	#	%	#	%	#	%	#	%

13. Date of public hearing on proposed amendment:

- Attach a copy of the public notice and minutes of the public hearing.
- Attach a map that identifies the location of any proposed activities.

14. For street projects only, number of beneficiaries on streets proposed to be improved:

15. Clearly explain the method for determining the revised beneficiaries.



# *Changes to Approved Projects*

Some changes that become necessary for project implementation do not involve a change in scope of work or number of project beneficiaries and may not require a full program amendment.

These program changes generally must be requested in writing by the grantee.

The request should describe the intended change to the project and statements regarding whether the change will affect the intent/scope of the project, number of project beneficiaries, and the Environmental Review Record.

# *Changes to Approved Projects*

OCD must be contacted anytime a Grantee seeks to make changes to an approved LCDBG project.

Amendments and/or project changes to the approved LCDBG project can neither be requested nor approved through the submittal of engineering change orders only.

Major reductions in the scope of proposed work could result in adverse state action — grant reduction, termination, or a finding of ineligibility for future funding.

## *PLEASE NOTE:*

Any changes that are not necessary to complete the originally approved project and/or require an amendment to the originally approved ERR will **NOT** be considered.



*Thank You!*



Office Of  
Community  
Development

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<https://www.doa.la.gov/doa/oed-lga/>

## *Coffee Talk*

*Monthly online technical  
assistance opportunity (link  
available on OCD-LGA  
website)*

