

CDBG-MIT PROGRAM

TOWN OF LAKE PARK

SUBRECIPIENT AGREEMENT MT130

TECHNICAL ASSISTANCE PLAN (TAP)

December 16, 2025

### Summary

Following the Florida Department of Commerce's (FloridaCommerce) recent monitoring in November 2025, FloridaCommerce has identified several areas in the subrecipient's CDBG-MIT Program where technical assistance (TA) could strengthen the programs' success. The objective of monitoring is to assist the subrecipient in addressing any potential gaps or deficiencies in processes, ensuring compliance with 24 CFR 570, 2 CFR 200, the terms and conditions in the Subrecipient Agreement, and the relevant Federal Register Notice(s).

### TA Methodology and Approach

This is a three-phased approach to address action items<sup>1</sup> identified during the monitoring visit.

- **Phase 1:** Conduct a TA session with staff to discuss action items and corrective steps<sup>2</sup>, if requested.
- **Phase 2:** Allow the time specified below for staff to implement the corrective actions outlined, thereby addressing any potential gaps or deficiencies.
- **Phase 3:** As needed, the Office of Long-Term Resiliency (OLTR) team will offer additional training to enhance program understanding.

### Action Items

The following Action Item(s) were identified during the monitoring visit. These items require immediate attention and corrective steps:

Action Item	Focus Area	Corrective Step(s)
<b>1. Missing 2 CFR Provisions in Contract</b>  The Town executed a contract with D.S. Eakins for services performed at Bert Bostrom Park. However, the contract did not include several 2 CFR Appendix II Part 200 federal	Procurement	To be compliant with contract requirements, the Town should amend its contract with D.S. Eakins Construction to include all the necessary Appendix II Part 200 contract provisions. The specific missing clauses are as follows:

<sup>1</sup> Action items represent the deficiencies in the program that if left unresolved will be a Finding in the monitoring report.

<sup>2</sup> Corrective steps outline the necessary steps to resolve these deficiencies.

<p>contract provisions as listed in Attachment L of the subrecipient agreement.</p>		<ul style="list-style-type: none"> <li>▪ (A) Administrative, Contractual, or Legal Remedies for breach of contract (for contracts &gt; simplified acquisition threshold)</li> <li>▪ (E-L) All contract clauses</li> </ul> <p>The 2 CFR Appendix II Part 200 Contract Provisions was provided to the Town as part of this TAP.</p>
<p><b>2. Duplication of Benefits Policy</b></p> <p>The Town was unable to provide a policy or procedure inclusive of language acknowledging the Town's responsibility for detecting potential duplication of benefits or procedures for assessing all potential sources of federal funds, as required by 83 FR 5848. Subrecipients of this grant are responsible for developing policies and procedures to outline these components in accordance with the subrecipient agreement.</p>	<p>Conformance to Subrecipient Agreement</p>	<p>It is advised that the Town update its 2 CFR 200 policy and procedures to include language specific to Duplication of Benefits or establish a standalone policy to this effect. Written policy should include at minimum, an evaluation method for identifying all potential sources of federal awards, processes for mitigating potential duplication, and repayment/recapture procedures if duplication is identified.</p> <p>A policy template addressing these requirements was provided to the Town as part of this TAP.</p>
<p><b>3. Section 3 and Davis-Bacon Labor Standards Compliance Policies</b></p> <p>The Town was unable to provide Labor Standards policies or mechanisms for tracking Section 3 and Davis Bacon compliance, as required by Attachment E, Sections 9 and 10 of the subrecipient agreement. The Town has already taken affirmative steps to adopt a policy.</p> <p>Additionally, record of the WH-1321 employee rights signage was determined to have lacked the necessary contact information, as required by HUD.</p>	<p>Conformance to Subrecipient Agreement</p>	<p>The Town should adopt Labor Standards policies and tools as part of its 2 CFR 200 policy and procedures or establish a standalone policy detailing how it will ensure compliance with Section 3 and Davis-Bacon requirements for this project. It is also recommended that future job site postings include the appropriate contact information for the Town's labor standards officer or assigned contact, in adherence with its forthcoming labor standards policy.</p> <p>A policy template addressing these requirements was provided to the Town as part of this TAP.</p>

<b>4. Citizens' Complaints and Program Appeal Information</b>  After a review of the Town's website, it was determined there is no information on the public site regarding how citizens can file complaints or file an appeal with the Subrecipient as required by Section 14 of the subrecipient agreement. The HUD complaint hotline information was also not found on the Town's website.	Conformance to Subrecipient Agreement	<p>The Town should update its website to include, in a centralized location, details on citizens' right to file a complaint or an appeal and information on how to file such complaints or begin an appeal with the Town concerning this and future projects.</p> <p>Under this TAP, the Town was provided the CDBG Disaster Recovery Website aid, together with a recommendation to launch a dedicated CDBG project webpage and adopt written policies establishing a defined update schedule.</p>
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**Action Items and Timeframe for Corrective Steps**

The above action items require implementation of the listed (or comparable) corrective steps. You are granted fifteen (15) workdays, ending on January 20, 2026, to implement the necessary corrections with the assistance of FloridaCommerce OLTR.

If circumstances warrant, you may request an extension of fifteen (15) additional workdays. To request an extension, please contact FloridaCommerce/OLTR prior to January 20, 2026.

**Important Note**

Action items that are not fully resolved will become Findings once the monitoring report is issued and will need to be corrected to close out the agreement. The Finding(s) will remain open until the necessary corrective action has been taken.

**Contact Information**

If you have any questions or would like to schedule TA, please contact your Grant Manager(s). We are available to support you in this process and ensure the success of your disaster recovery and mitigation programs.