

# Office of Community Development State of Louisiana

Division of Administration

JEFF LANDRY
GOVERNOR



TAYLOR F. BARRAS
COMMISSIONER OF ADMINISTRATION

August 23, 2024

Honorable Staci Albritton Mitchell Mayor, City of West Monroe 2305 N. 7<sup>th</sup> Street West Monroe, Louisiana 71291-5256

RE: Authorization to Incur Costs, Application Revisions, and Grant Agreement Transmittal FY 2024 LCDBG Make a Difference Program

Dear Mayor Mitchell:

Again, congratulations on being selected as a recipient of FY 2024 Louisiana Community Development Block Grant (LCDBG) funds.

Upon receipt of this letter, you have the authorization to incur costs for planning and administration which includes the preparation of plans and specifications, the environmental review record, and other items necessary to clear grant agreement conditions. Reimbursement of such costs will be contingent upon your receipt of an executed grant agreement with the State. No LCDBG monies can be used to reimburse the grant recipient for any costs incurred prior to the date of this letter. Please note that should the contract not be issued or the project assistance request be withdrawn for whatever reason, the grant recipient may be responsible for payment of all planning and administration costs incurred.

Under no circumstances should the grant recipient advertise for bids or begin construction on an activity at this time. Written authorization will be provided from this office to advertise for bids when funds have been released and the plans and specifications for the project have been reviewed by this office. Funds will not be released until the conditions listed in Exhibit A of the LCDBG contract have been submitted and approved/cleared by this office.

To assist the Office of Community Development-Local Government Assistance (OCD-LGA) in the in-house processing of the City's grant award/program activities, the OCD-LGA must request some additional information, as well as revisions to forms that were included in the original application for funds. These items are considered to be conditions of release of contract funds and must be received, reviewed, and <u>cleared</u> by the OCD-LGA within **five (5) months** of the date of this letter. This timeline will be **strictly** enforced. The State may grant an extension, if necessary. Any extension request must be submitted to the OCD-LGA prior to the deadline.

#### **APPLICATION REVISIONS**

1. Activity Beneficiary Form

An Activity Beneficiary Form must be completed and submitted. This form can be found at <a href="https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/forms-and-information/">https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/forms-and-information/</a>.

2. Disclosure Report

A Disclosure Report must be completed and submitted. This form can be found at <a href="https://www.hud.gov/sites/dfiles/OCHCO/documents/2880.pdf">https://www.hud.gov/sites/dfiles/OCHCO/documents/2880.pdf</a>.

3. Jurisdictional Map

The map(s) of the target area(s) included in the application does not visually identify the number of minority persons and percentage of the minority group. Census tracts, and/or block groups associated with the target area(s) must also be identified. Please provide this office a revised map with the required information.

### **ADDITIONAL ITEMS**

- 1. The LCDBG Grant Agreement Please read the enclosed grant agreement carefully before signing it and returning it to this office. The signature of the local government official must be witnessed where indicated. Do not fill in the date(s) throughout the grant agreement.
- 2. Electronic Funds Transfer (EFT) Enrollment Form This office has mandated that all grantees receive funds through electronic transfer. In order to complete this requirement, contact the Office of Statewide Reporting and Accounting Policy (OSRAP) at 225-342-1097 or \_DOA-OSRAP-EFT@la.gov for the enrollment form. In the email, include your LaGov vendor number which starts with "31" and/or your Federal Employee Identification Number. Vendor registration information can be found at <a href="https://www.doa.la.gov/media/bahlig4w/lagov-new-vendor-registration.pdf">https://www.doa.la.gov/media/bahlig4w/lagov-new-vendor-registration.pdf</a>. Confirmation of submittal to OSRAP is required. Do not send the completed EFT Enrollment form nor a copy of a voided check to the OCD-LGA.
- 3. The City must complete and send to this office a "Financial Management Questionnaire." An attachment to the Questionnaire regarding proof of current fidelity insurance or bonding must also be provided. The Financial Management Questionnaire is located at: <a href="https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/grant-management-forms-and-handbooks/">https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/grant-management-forms-and-handbooks/</a> → Financial Management Questionnaire.
- 4. The City must prepare and adopt, by resolution, a Residential Antidisplacement and Relocation Assistance Plan; a sample plan is shown in Exhibit C-14 in the 2024 Grantee Handbook. Once prepared, please send a copy of the plan and resolution to this office. If the City adopted this plan for a previously funded LCDBG grant, it may choose to pass a resolution stating that the previously adopted plan is still in effect and will also be used for the FY 2024 program; if this measure is chosen, then it will only be necessary to forward a copy of the latter resolution to this office.

- 5. The City must submit a Performance Schedule in order for this office to project expenditures by the State's fiscal year. The LCDBG Performance Schedule format and its instructions can be located on this office's website at https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/grant-management/.
- 6. The City must prepare and adopt, by resolution, the new LCDBG procurement policy. The City must have or develop procurement procedures for the different methods of procurement it will utilize. The procedures should conform to the Federal grant procurement standards. Examples of procurement procedures for the different federal procurement methods can be found on the Forms and Information page on the Office of Community Development-Local Government Assistance's website. Once prepared please send a copy of the procurement procedures, and resolution adopting both to this office.
  - The City must also submit procurement documentation, including the Request for Proposals/Qualifications (RFP/RFQ), the solicitation, and the written evaluation plan for professional services to be paid with grant funds, if applicable.
- 7. An Environmental Review Record (ERR) must be prepared according to 24 CFR Part 58. Instructions are provided in Section A of the 2024 Grantee Handbook on pages A-18 through A-34. Exhibits are also referenced in Section A.
  - The ERR must be submitted to the OCD-LGA, reviewed, and the grantee be given authority by the OCD-LGA to publish appropriate notices and to request release of grant funds within <u>five</u> (5) months of the date of this letter.
- 8. A copy of the plans and specifications plus a final cost estimate for the project must be <a href="submitted">submitted</a> to this office for review within <a href="five">five</a> (5) months of the date of this letter. The final cost estimate must include applicability to Build America Buy America (BABA) (see Grantee Handbook page D-14). If at the end of the five-month calendar period the plans and specifications and final cost estimate have not been submitted to this office, a \$250 per working day penalty will be assessed. If revisions to the plans and specifications are requested by this office, these documents must be received by the OCD-LGA within thirty (30) calendar days of the request or by the five-month deadline for clearance of contract conditions, whichever is later. Failure to comply with this requirement will result in a \$250 per working day penalty. If revisions are submitted timely but do not adequately comply with the revisions requested, the penalty as described above may be assessed at the State's discretion.
- 9. The City 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 reevaluated 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 for review and approval with the certification form. The certification form can be found at https://www.doa.la.gov/doa/ocd-lga/lcdbg-programs/grant-management-forms-andhandbooks/grantee-handbook-and-exhibits/section-a/ → A-27 Violence Against Women Act (VAWA) Certification.

Honorable Staci Albritton Mitchell August 23, 2024 Page 4

- 10. In order to meet the requirements of the Federal Funding Accountability and Transparency Act of 2006, all recipients of federal funds must be registered in the System for Award Management (SAM). The online system at <a href="www.sam.gov">www.sam.gov</a> does not show an active registration for the City. The City must provide evidence of its active SAM registration by submitting the registration page from SAM showing the CAGE Code and Unique Entity ID.
- 11. Professional firms for which this office has no record of having participated in an LCDBG program during the past five years must obtain verification of professional services eligibility—also known as contractor clearance. Please send this office the "Verification of Professional Services Eligibility" form, Exhibit D-15 in the Grantee Handbook, for Alex Holland if she will be participating in the implementation of the grant. Please also identify any other individuals or firms who will provide professional services for this grant.
- 12. Housing Implementation Plan

Enclosed is a list of items that must be addressed for the housing rehabilitation and homeownership assistance portions of this grant. Additional items may be required after OCD-LGA reviews the information provided by the City.

#### **GENERAL COMMENTS**

Based on various factors, the City has been identified as a medium-risk grantee. Therefore, the City can request an on-site technical assistance visit prior to the date that the OCD-LGA schedules to monitor this grant. During this visit, the OCD-LGA staff will work with the City to ensure that all compliance areas are adhered to as required.

The City has been allowed LCDBG funds as follows:

\$	75,000	Public Facilities Recreation
	400,000	Homeowner Rehabilitation
	425,000	Homeownership Assistance
	100,000	Administration
\$ 1	.000,000	Total

As a reminder, all items requested in this letter must be cleared by January 23, 2025. "Cleared" means the items must be submitted to, reviewed by, and approved by this office. The exceptions, as noted in items 7 and 8, are for ERR, which requires approval from this office to publish appropriate notices by the deadline, and for plans and specifications, which must be submitted to all required agencies by the deadline. Failure to do so will result in the deduction of \$250 in LCDBG funds per working day from the engineering line item budget for Plans and Specifications, and from the administrative line item budget for all other items including the ERR. For Plans and Specifications, the penalties will be deducted from the amount of LCDBG funds contracted to an engineer/architect for basic services. If engineering/architectural services are not being paid with LCDBG funds, the penalties will be deducted from the construction line-item funds and disallowed. For LCDBG administrative

Honorable Staci Albritton Mitchell August 23, 2024 Page 5

funds, the monies will be deducted from the amount of contracted to an administrative consultant. If the grant recipient chose to administer the grant using its own staff, the penalty will be assessed against the LCDBG administrative funds, and disallowed. If the grant recipient is not using LCDBG administrative funds, the penalty will be assessed against the construction line-item funds and disallowed. If the failure to clear grant agreement conditions within the required timeframe is the fault of another party then the penalty will be assessed accordingly. The State may grant an extension where the reasons for not meeting the required time frame were clearly beyond the control of the grant recipient and/or the administrative consulting firm or the engineering/architectural firm.

Following this office's review of the project's plans and specifications and clearance of contract conditions, the grantee will receive a letter of authorization to advertise for bids; the grantee is expected to advertise for bids within thirty days of the date of that letter. A copy of the publicized bid advertisement, including the publication date, must be submitted to this office. Failure to comply with this bid advertisement requirement will result in an assessment of \$250 per working day. The assessment will be deducted from the amount of LCDBG funds allowed for basic engineering services. If LCDBG funds are not used to pay for basic engineering services, the penalty will be deducted from the construction line item in the LCDBG contract and disallowed. If the failure to advertise for bids within the required timeframe is the fault of another party such as the local government or the administrative consultant, then the penalty will be assessed accordingly, or be deducted from the construction line item in the LCDBG contract and disallowed. If there are extenuating circumstances which prevent publication of the advertisement for bids within the thirty-day period, the local government must request an extension of time from this office prior to the end of the thirty-day period. The State reserves the right to grant an extension when the reasons for not meeting the timeframe are valid.

A copy of the Grantee Handbook can be accessed through the LCDBG website.

Please submit the information requested in this letter as soon as possible. If there are any questions, please contact Lisa Bergeron at (225) 342-7412.

Sincerely,

Traci Watts

Director, Local Government Assistance Office of Community Development

Plo

Enclosures

c w/encl:

Alex Holland, Administrative Consultant

c:

Lisa Bergeron, Office of Community Development

File: FY 2024, Make a Difference, Application

## Office of Community Development – Local Government Assistance Housing Implementation

#### HOUSING REHABILITATION

- 1) Refinement of housing rehabilitation program plans, procedures and forms: subject to review and approval by OCD, the Grantee will establish, or make any necessary revisions to, the housing rehabilitation program design and procedures
- 2) Outreach: the Grantee will conduct sufficient advertisement of the housing rehabilitation program and other forms of outreach to ensure that enough eligible applicants from the designated target neighborhood(s) of
- 3) Intake/assessment of eligibility: the Grantee will assist property owners and residents in the designated neighborhoods in the completion of applications to permit eligibility determinations for rehabilitation assistance.
- 4) Work write-ups: for each eligible unit to be assisted, the Grantee will complete a detailed work write-up of the rehabilitation to be performed, including estimated costs of each activity, materials to be used, and industry or regulatory standards to be met.
- 5) Bank financing: for those applicants who will be securing some of the financing for the rehabilitation work through private loans from a bank or other type of private financial institution, the Grantee will provide assistance to applicants when applying for such complementary financing upon request.
- 6) Solicitation and selection of contractors: the Grantee will assist approved applicants in the identification, proper solicitation, and selection of contractors qualified to perform the authorized rehabilitation of eligible housing units.
- 7) Periodic and final inspections: the Grantee will perform periodic site visits to ascertain that approved and contracted rehabilitation work is proceeding properly and satisfactorily, will authorize (with the owner's written approval, including signature and date) appropriate change orders, and will mediate in the event of owner dissatisfaction with the work done by the contractor.
- 8) Approval of contractor payments: as rehabilitation progresses and as invoices are submitted by contractors, the Grantee will verify that the expenses are reasonable and the work has been completed properly (including a sign-off by the owner), and will authorize drawdown of funds from the OCD, and disbursement to the contractors.
- 9) Maintenance of case files and other records: for each applicant, the Grantee will maintain case files, including application and documentation of eligibility, work write-ups, the assistance agreement between the property owner and Grantee (along with repayment/ recapture provisions), documentation of liens and any other forms of security, contractor selection criteria, copy of contract between owner and contractors), documentation on all necessary licenses and permits, site visit/inspection reports (including final inspection), change orders, and approved contractor invoices for payment (with owner sign-off).

#### HOMEOWNER ASSISTANCE

- 1) Development of homeowner assistance program plans, procedures and forms: subject to review and approval by OCD, the Grantee will establish the applicant eligibility requirements, the program assistance terms for the homeowner assistance program
- 2) Outreach: the Grantee will conduct sufficient advertisement of the homeowner assistance program and other forms of outreach to ensure that enough eligible applicants from the designated target neighborhood(s) of .....
- 3) Intake/assessment of eligibility: the Grantee will assist applicants in the designated neighborhoods in the completion of applications to permit eligibility determinations for homeowner assistance.