

ST. CLAIR COUNTY, ILLINOIS
COMMUNITY DEVELOPMENT BLOCK GRANT
DISASTER RECOVERY
POLICIES & PROCEDURES MANUAL

FINANCIAL ADMINISTRATION AND MANAGEMENT
OF THE
HUD COMMUNITY DEVELOPMENT BLOCK DISASTER
RECOVERY GRANT



Table of Contents

SECTION 1: INTRODUCTION	3
SECTION 2: ELIGIBLE AND INELIGIBLE ACTIVITIES	4
SECTION 3: NATIONAL OBJECTIVES	5
SECTION 4: FINANCIAL MANAGEMENT	6
SECTION 5: PROCUREMENT.....	6
SECTION 6: DOCUMENT CONTROL, WEBSITE AND REPORTING	6
SECTION 7: OVERALL BENEFIT OF LOW/MOD INCOME PEOPLE.....	7
SECTION 8: PROGRAM ADMINISTRATION COSTS LIMITATION	7
SECTION 9: PUBLIC SERVICE CAP	8
SECTION 10: PRE-AWARD COST GUIDANCE	8
SECTION 11: RISK MANAGEMENT AND PROGRAM COMPLIANCE	8
SECTION 12: FEDERAL DEBARMENT/SUSPENDED LIST	10
SECTION 13: MONITORING.....	10
SECTION 14: TIMELINESS OF EXPENDITURES	13
SECTION 15: AUDITS.....	13
SECTION 16: FAIR PRACTICES AND ECONOMIC OPPORTUNITY.....	14
SECTION 17: UNIFORM RELOCATION REQUIREMENTS	16
SECTION 18: FEDERAL LABOR STANDARDS & DAVIS-BACON WAGE RATES.....	17
SECTION 19: INSURANCE REQUIREMENTS.....	18
SECTION 20: ENVIRONMENTAL REVIEW	19
SECTION 21: FEMA IDENTIFIED FLOOD ZONES & NATIONAL FLOOD INSURANCE.	19
SECTION 22: LEAD-BASED PAINT AND LEAD HAZARDS	20
SECTION 23: INCOME ELIGIBILITY	24
SECTION 24: TERM AFFORDABILITY & CONTINUED AFFORDABILITY	24
SECTION 25: MITIGATION SET-ASIDE	25
APPENDIX I: REQUEST FOR QUALIFICATIONS FOR ENGINEER SERVICES	26
APPENDIX II: TERMS.....	27
APPENDIX III: ADDITIONAL RESOURCES	29
REVISION HISTORY	30

SECTION 1: INTRODUCTION

This document is to provide guidance for the [St Clair County Intergovernmental Grants Departments](#) that will assist in carrying out its financial and programmatic responsibilities for its [Community Development Block Grant Disaster Recovery Grant Funds \(CDBG-DR\)](#) awards. As of November 2025, St. Clair County has received two CDBG-DR awards:

- 2022 Flood Disaster: \$30 million allocated by [88 FR 32046](#), published on May 18, 2023.
- 2024 Flood Disaster: \$89 million allocated by [90 FR 4759](#), published on January 16, 2025

This guidance applies to all CDBG-DR grants received by the County unless otherwise specified.

The department operates in compliance with federal administrative requirements, including:

- [2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [24 CFR Part 570 -- Community Development Block Grants](#)
- Applicable Federal Register Notices allocating CDBG-DR funding to the County
 - [88 FR 32046](#), published on May 18, 2023, or the 2022 CDBG-DR allocation
 - [90 FR 4759](#), published on January 16, 2025, for the 2024 CDBG-DR allocation

These include ensuring that all funded projects are HUD Eligible Activities (or as allowed by waiver) and meet one of [HUD's National Objectives](#) with particular attention to the use of Urgent Need where applicable. The department will prioritize projects located in Most Impacted and Distressed ([MID](#)) areas and incorporate mitigation strategies to promote long-term resilience against future disasters.

All activities must demonstrate a clear tie-back to the qualifying disaster, and the department will maintain robust records management protocols to ensure transparency and accountability. As program needs evolve, the department will follow HUD's prescribed [Action Plan Amendment Process](#) in alignment with the SCC IGD Citizen Participation Plan to make necessary adjustments to funding allocations, eligible activities, or program priorities.

Action Plan Amendments: SCC IGD will amend its CDBG-DR Action Plan as required by HUD and applicable Federal Register notices. Substantial amendments include:

1. adding or removing a program or activity,
2. reallocating funds beyond HUD-defined thresholds, or
3. making changes that alter the scope, beneficiaries, national objective, or geographic focus of an activity.

All other updates—such as minor budget adjustments, administrative corrections, or clarifications that do not change scope or outcomes—are considered non-substantial amendments. Procedures for notice and comment are outlined in the SCC IGD Citizen Participation Plan.

St. Clair County also ensures compliance with:

- **Citizen Participation Requirements**, including public notice, comment periods, and outreach strategies; all relevant participation materials and updates are made available on the St. Clair County Intergovernmental Grants Department website [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)
- **Disability and Accessibility Standards**, including compliance with Section 504, the Americans with Disabilities Act (ADA), and language access provisions; the County follows the St. Clair County IGD–CD Section 504 Policy and Procedure, the [County ADA Resolution](#), and the County [Title VI Plan](#).
- **Mitigation Set-Aside Requirements**, including compliance with HUD’s 15% set-aside; mitigation activities are guided by the County’s 2024 Multi-Hazard Mitigation Plan (MHMP), as referenced in the CDBG-DR Action Plan
- **Pre-Award Cost Guidance**, ensuring that any costs incurred prior to grant execution are eligible, reasonable, and compliant with HUD requirements
- **Citizen Complaint Procedures** providing a formal process for submitting and resolving complaints; appeals and grievances are specifically outlined in the *New Construction and Public Facilities Infrastructure Policies and Procedures Manual*. Both policies can be located on the county website at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).
- **Section 3 Requirements**, promoting economic opportunities for low- and very low-income persons

SECTION 2: ELIGIBLE AND INELIGIBLE ACTIVITIES

Eligible Activities

All funded activities must:

- Be listed as HUD Eligible Activities under 24 CFR Part 570 or as allowed by waiver
- Meet one of HUD’s National Objectives: Low- and Moderate-Income Benefit, Slum and Blight, or Urgent Need
- Demonstrate a clear tie-back to the qualifying disaster
- Be located in or benefit Most Impacted and Distressed (MID) areas, where applicable

Ineligible Activities

The department will not fund activities deemed ineligible under the Universal Notice unless a waiver is granted. These include:

- General government expenses
- Political activities
- Purchase of equipment not tied to eligible activities
- Income payments (except as allowed by waiver)
- Construction of new housing in a floodplain without mitigation

- Any activity that does not meet a National Objective or demonstrate a tie-back to the qualifying disaster

SECTION 3: NATIONAL OBJECTIVES

Low- and moderate-income (LMI) is defined by HUD as a household income that does not exceed 80% of Area Median Income. HUD updates income limits annually on the HUD User website.

All CDBG-DR activities must meet one of the three CDBG National Objectives ([24 CFR 570.208](#)):

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

National Objective Documentation Summary

National Objective / Sub-Type	Description	Required Documentation
LMA – Low/Mod Area Benefit	Benefits all residents in a defined service area where $\geq 51\%$ are LMI	HUD LMI data; service area map; boundary justification
LMC – Low/Mod Limited Clientele	Benefits a specific group; $\geq 51\%$ LMI or presumed benefit	Intake forms <i>or</i> presumed benefit category documentation
LMH – Low/Mod Housing	Provides or improves permanent housing for LMI households	Income verification; unit counts; affordability requirements
LMJ – Low/Mod Jobs	Creates or retains jobs benefiting LMI persons	Employer job creation/retention records showing LMI benefit
Slums/Blight	Addresses slum/blight on an area or spot basis	Local slum/blight designation (area) <i>or</i> property-specific evidence; documentation showing removal of blight
Urgent Need	Addresses immediate threat to health/welfare tied to the disaster when no other funds are available	Evidence of the threat; disaster tie-back; certification of no other funding sources

SECTION 4: FINANCIAL MANAGEMENT

The following parts detail financial management systems that will be utilized to maximize compliance and efficiency. Please refer to St. Clair County Intergovernmental Grants Department [Financial Policies and Procedures](#).

SECTION 5: PROCUREMENT

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

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

SECTION 6: DOCUMENT CONTROL, WEBSITE AND REPORTING

All documents used by staff will be standardized, properly documented, recorded, and auditable. Documents will be placed on the St. Clair County Intergovernmental Grants [St. Clair County Intergovernmental Grants Intergovernmental Grants](#) website under the CDBG-DR folders, which includes separate files for CDBG-DR 2022 and CDBG-DR 2024. Records, applications, and support documents related to the grant shall be retained for the greater of seven years from close-out of DR grant award, final audit acceptance, or the period required by other applicable laws and regulations. Files will consist of source documentation, including contracts and sub-grant awards and will be maintained in hard copy files. The County's MIP system will also retain all source documentation and accounting records for the same period.

A quarterly performance report will be submitted to HUD no later than 30 days following the end of each quarter after grant award and continuing until all funds have been expended and all accomplishments have been reported. Each quarterly report will include information about the uses of funds during the applicable quarter including (but not limited to) the project name, activity, location, and national objective; funds budgeted, obligated, drawn down and expended; the funding source and total amount of any non-CDBG-DR funds to be expended on each activity; beginning and completion dates of activities; achieved performance outcomes; status of quarterly spending estimates and completion targets for each project; and the race and ethnic status of persons assisted under direct-benefit activities. Quarterly reports to HUD will be submitted using the DRGR system and within 3 days the County will post the submitted report to its official website.

The County will maintain a public disaster recovery webpage that permits individuals and entities awaiting assistance and the general public to see how all grant funds are used and administered. The webpage is located within the County's official website at [St. Clair County Illinois >](#)

[Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#). It will provide, at a minimum:

- Administrative Action Plan (if applicable)
- Action Plan
- Action Plan Amendments (if applicable)
- Quarterly DRGR performance reports
- Citizen participation plan
- Procurement policy
- Program-specific policies and procedures including a projection of expenditures and outcomes including a projection of expenditures and outcomes
- All contracts that will be paid with CDBG-DR funds
- Procurement documents (RFPs, RFQs, solicitations, etc.)
- Procurement summary indicating the status of services or goods currently being procured by the County (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold are not required to be posted to the website. The website will be made available in a form accessible to people with disabilities.

All critical information will be updated at least quarterly by County staff.

SECTION 7: OVERALL BENEFIT OF LOW/MOD INCOME PEOPLE

In accordance with the Federal Register Notices governing the CDBG-DR allocations for both disasters:

- [88 FR 32046](#), published on May 18, 2023, for the 2022 disaster, and
- [90 FR 4759](#), published on January 16, 2025, for the 2024 disaster,

At least that 70% of total CDBG-DR funds awarded must benefit low- and moderate-income (LMI) persons.

SECTION 8: PROGRAM ADMINISTRATION COSTS LIMITATION

In accordance with [Public Law 117-328](#) (2022 allocation), [Public Law 118-158](#) (2024 allocation), and applicable Federal Register Notices:

- [88 FR 32046](#), published on May 18, 2023, or the 2022 CDBG-DR allocation, and
- [90 FR 4759](#), published on January 16, 2025, for the 2024 CDBG-DR allocation,

no more than 5% of total CDBG-DR grant awards, plus 5% of any program income generated, may be used for program administrative costs. This limitation applies to each grant individually and must be tracked separately to ensure compliance.

The department will implement financial management procedures to monitor administrative expenditures and ensure they are necessary, reasonable, allowable, and allocable under [2 CFR Part 200](#).

Additionally, in accordance with the [CDBG-DR Consolidated Notice](#) and Universal Notice, as applied through the applicable Federal Register Notices including [88 FR 32046](#) (2022 allocation)

and [90 FR 4759](#) (2024 allocation), planning costs are subject to a separate cap. No more than 15% of each total CDBG-DR grant award, plus 15% of any program income, may be used for eligible planning activities

SECTION 9: PUBLIC SERVICE CAP

In accordance with [24 CFR 570.201](#) and applicable Federal Register Notices:

- [88 FR 32046](#), published on May 18, 2023, or the 2022 CDBG-DR allocation, and
- [90 FR 4759](#), published on January 16, 2025, for the 2024 CDBG-DR allocation;

no more than 15% of the total amount of CDBG-DR funds will be utilized for Public Services.

The department will ensure compliance with both caps through careful tracking and documentation of expenditures and will maintain clear distinctions between public service and planning activities in its financial reporting systems.

SECTION 10: PRE-AWARD COST GUIDANCE

St. Clair County may incur eligible pre-award costs prior to the execution of the CDBG-DR grant agreement and before funds are committed, in accordance with HUD guidance. These costs must:

- Be necessary and reasonable for the performance of CDBG-DR activities
- Comply with applicable federal regulations, including [2 CFR Part 200](#) and [24 CFR Part 570](#)
- Be documented and tracked to ensure transparency and accountability
- Not duplicate assistance received from other sources
- Environmental review must be completed and approved under [24 CFR Part 58](#) before any choice-limiting activity (like infrastructure or construction) occurs.

All pre-award costs will be reviewed for eligibility and compliance prior to reimbursement or inclusion in program budgets.

SECTION 11: RISK MANAGEMENT AND PROGRAM COMPLIANCE

In order to ensure the proper disbursement of grant funds, the County plans to remain in compliance with applicable CDBG rules and regulations, as well as other applicable federal regulations such as Office of Management and Budget [2 CFR Part 200](#). The County will particularly emphasize mitigation of fraud, abuse and mismanagement related to accounting, procurement and accountability which may also be investigated. The County will monitor the compliance of applicants and HUD will monitor the County's Disaster Recovery Program.

Steps to Avoid Fraud, Waste and Abuse of Funds

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

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

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

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

Duplication of Benefits

As provided by the [Stafford Act 42 U.S.C. 5121-5207 Section 312](#) duplication of benefits is prohibited. The Staff will continuously monitor, or cause to be monitored, for compliance with this requirement. FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies will be contacted, and data sharing agreements put into place to ensure that there is no duplication of benefits occurring within the various programs.

CDBG-DR funds will not be used for activities for which funds have been received (or will be received) from FEMA, National Flood Insurance Program, private insurers, the U. S. Army Corps of Engineers, SBA and other agencies. CDBG-DR funds may be used to provide assistance to the extent that a disaster recovery need has not been met by other sources. Applicants for assistance will be required to disclose all sources of assistance applied for, received or to be received on a Duplication of Benefits Form (see DOB policies and procedures) located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#). All applicants will sign an application and a contract verifying all sources and an agreement to pay back any or all of the CDBG-DR assistance if additional duplicative funding is made available to them during the term of the contract or after the contract expires.

The County will be responsible for verifying the application information before an award is made or a contract is executed. The County will use data from FEMA, SBA, private insurance, etc., to verify Duplication of Benefits. Unique budget codes will be established for all projects and expenditures will be tracked using MIP software. Any findings of duplicated benefits will be reported by Staff to the Director and Finance who will immediately notify the County's Law department and HUD. Appropriate actions will be taken to reclaim benefits following a full review. The County executes agreements with recipients of CDBG-DR funds that will guide recapture of funds if a Duplication of Benefits is discovered after the disbursement of funds (subrogation agreements). For detailed procedures and requirements, staff should refer to the *Duplication of Benefits Policy*, available on the St. Clair County Intergovernmental Grants Department website [St. Clair County Intergovernmental Grants Department Community Development](#) website under the CDBG-DR section.

Conflict of Interest

The County does not permit individuals having functions or responsibilities with respect to activities assisted with CDBG, CDBG-DR, COC or HOME funds, or who are in a position to participate in a decision-making process, or gain inside information with regard to these activities, from obtaining a financial interest or benefit from a CDBG, CDBG-DR, CDBG-CV, COC or HOME- assisted activity or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business-ties, during their tenure or for one year thereafter. This provision applies to employees, agents, consultants, officers, or elected/appointed official of the County. Exceptions to this policy can only be approved by HUD upon submission of a written request for an exception.

Applicants having any of the before mentioned positions, relationships or associations that may or could influence the decision-making process or outcome of a request for assistance in any manner, shape or form, must disclose the nature of their association, in order that the appropriate procedure for facilitating assistance may be followed. Failure to disclose this information may cause immediate termination of the application or a return of program funds after the fact.

SECTION 12: FEDERAL DEBARMENT/SUSPENDED LIST

HUD regulations at [24 CFR Part 24](#) , [2 CFR Part 180](#), [2 CFR Part 200](#) and [2 CFR Part 2424](#) , prohibit the use of HUD financial assistance to directly or indirectly employ, award contracts to, or otherwise engage the services of, or fund any contractor or developer during any period of debarment, suspension, or placement in ineligibility status.

As part of property-specific CDBG-DR grant or loan agreements, developers and other contractors are required to provide certification that neither the developer/contractor nor its principals are currently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in the covered transaction.

The System for Award Management (SAM) (SAM.gov) is an electronic, web-based system that identifies those parties excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non-financial assistance and benefits.

SECTION 13: MONITORING

The County will continuously monitor awardees which will provide quality assurance. The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. Any entity administering CDBG-DR funding will be monitored not less than once during the contract period. The monitoring will address program compliance with contract provisions, including national objectives, financial management, and the requirements of [24 CFR Part 58](#) environmental reviews. Monitoring activities will be conducted in accordance with the County's Compliance Monitoring Policy and Procedures Manual, available on the St. Clair County Intergovernmental Grants Department website [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

At the time of this policy's adoption, St. Clair County's CDBG-DR programs are administered directly by the County and do not utilize subrecipients. All program activities are monitored through internal self-monitoring procedures conducted by County staff. If subrecipients are engaged in the future, the Intergovernmental Grants Department Community Development Division (IGD-CD) will revise this policy to incorporate formal subrecipient monitoring procedures consistent with HUD guidance. This will include the development of annual monitoring plans, clear definitions of roles and responsibilities, and protocols for conducting formal monitoring of subrecipient activities. This approach ensures continued compliance with HUD regulations and readiness to implement appropriate oversight mechanisms should program delivery structures change.

The County through the Intergovernmental Grants Department will oversee all activities and expenditures of the CDBG-DR funds. Existing County employees will be utilized, and additional personnel and contractors may be hired to aid in the administration of, and to carry out, recovery programs. Not only will these personnel remain involved in ensuring that there are layers of financial control, they also will provide technical assistance to the County, and will undertake administrative and monitoring activities to better assure compliance with applicable requirements, including, but not limited to, meeting the disaster threshold, eligibility, national objective compliance, nondiscrimination, labor standards, environmental regulations, and procurement regulations at [2 CFR Part 200](#).

Each activity funded will meet the disaster threshold and one of HUD's three national objectives, with emphasis on achieving the primary national objective of benefiting low- and moderate-income persons and will be an eligible activity. The County will perform the monitoring in accordance with a CDBG-DR monitoring plan.

The County will further maintain a high level of transparency and accountability by using a combination of risk analysis of programs and activities, desk reviews, site visits, and checklists.

The County will determine appropriate monitoring of grants, considering prior grant administration performance, audit findings, as well as factors such as the complexity of the project. The primary purpose of the County's monitoring strategy is to ensure that all projects comply with applicable federal regulations and are effectively meeting their stated goals. The frequency and areas monitored will be determined by a risk analysis. All projects will be monitored at least once on-site during the life of the activity.

The County will determine the areas to be monitored, the number of monitoring visits, and their frequency. The County will continue to follow all guidelines it uses to monitor projects funded under the regular CDBG program. The monitoring will address program compliance with contract provisions, including, but not limited to environmental reviews, Section 3 compliance, compliance with the Davis-Bacon Act as well as other labor standard provisions, procurement regulations, and equal opportunity requirements, and compliance with the [2 CFR Part 200](#), program income, and other CDBG financial requirements.

The County has an established internal fiscal monitoring procedures in the [St. Clair County Financial Policies and Procedures](#). These procedures are distinct from the programmatic monitoring conducted under this policy and are further detailed in the [St. Clair County IGD-CD Compliance Monitoring Policy and Procedure Manual](#).

Monitoring Objectives

The County's Intergovernmental Grants Department will be knowledgeable about the content and operation of the County's compliance and ethics guidelines. The County does not anticipate utilizing subrecipients in its CDBG-DR programs, but in the event they would, the County will exercise reasonable oversight for the implementation and effectiveness of any sub-recipient programs, through the following objectives:

- Assuring that sub-recipients with operational responsibility are monitored through regular ongoing risk assessment; regularly performing and reviewing risk assessments; and recommending and assuring that appropriate steps are taken to design, implement, or modify compliance activities to reduce the compliance risks identified by risk assessments.
- Assuring that compliance roles and responsibilities are clearly established across the sub-recipient's system and that due care is taken in delegating substantial authority.
- Assuring that sub-recipients implement standards of conduct, policies, procedures and internal control systems reasonably capable of ensuring compliance and reducing misconduct within their organization.
- Exercising reasonable oversight over compliance activities, to include requesting and receiving information on the implementation and effectiveness of the compliance and ethics program from individuals with day-to-day operational responsibility.
- Assuring that the sub-recipients compliance standards, procedures and expectations are effectively communicated through technical assistance and other appropriate means.
- Assuring that reasonable steps have been taken to achieve compliance with regulations, policies, and procedures throughout the sub-recipient's organization using reasonably designed auditing and monitoring systems as well as periodic evaluation of the compliance program's effectiveness.
- Assuring that sub-recipients maintain an effective mechanism for employees to report or seek guidance regarding potential or actual wrongdoing, including mechanisms to allow for anonymous reporting, and appropriate safeguards to protect against potential retaliation.
- Assuring that compliance is promoted and enforced consistently throughout the sub-recipient agency.
- Reporting on the implementation and effectiveness of the compliance program.
- Taking such other actions, or making such other recommendations, as are necessary to promote an ethical organizational culture.

Team Members

Monitoring will be carried out primarily by the CDBG-DR staff, Project Coordinator and the Fiscal Manager. The Director will oversee all monitoring activities. The Project Coordinator or designee will report directly to the Director on all monitoring issues.

Monitoring Activities

The monitoring activities will consist of comprehensive and thorough procedures to meet the monitoring objectives above. These procedures and monitoring activities will be documented through the project life cycle and will vary according to their need. The CDBG-DR staff, Project Coordinator and the Fiscal staff will conduct reviews, monitoring, and internal audits of subrecipients at the Intergovernmental Grants Department Office and onsite if necessary.

SECTION 14: TIMELINESS OF EXPENDITURES

The County uses regular monitoring and reporting to ensure that timeliness standards are met. This requirement aligns with [2 CFR Part 200](#), which mandates timely and accurate financial reporting and performance tracking for federally funded programs. The CDBG-DR Action Plan in DRGR will provide quarterly spending estimates and completion targets for each project. The CDBG-DR staff/Project Coordinator will track expenditure and completion targets on a monthly basis. At the time of each quarterly report in DRGR, the CDBG-DR staff/Project Coordinator will compare the actual expenditures and completion rates against the projected expenditures and completion rates within DRGR. The CDBG-DR staff/Project Coordinator will identify any discrepancies. Where there are discrepancies, the CDBG-DR staff and the Project Coordinator will create a plan to return to the anticipated schedule or revise the schedule as necessary. Adjustments and revisions will be submitted to the CDBG-DR staff and Project Coordinator for pre-approval before moving forward to the Executive Director for final approval. Once approved, the adjustments and revisions will be entered into DRGR. Where projects become stalled and will be unable to be completed timely, the Project Coordinator/ Fiscal Manager will reprogram funds to a different activity within the current Action Plan. All revisions will be entered into DRGR by the Community Development Specialist in the next quarter after the project/activity has been cancelled and funds have been identified. The County does not anticipate receiving program income however, should program income be received the County will utilize CDBG-DR program income prior to drawing additional grant funds from the line of credit.

Grant Expenditure Deadline

In accordance with the requirements of the CDBG-DR grant agreement and the applicable Appropriations Act, all CDBG-DR funds must be expended by the expenditure deadlines established for each respective CDBG-DR allocation. The County will monitor expenditure rates monthly and quarterly to ensure adequate progress toward meeting this deadline. If projections indicate that the expenditure deadline is at risk, the CDBG-DR staff and Project Coordinator will implement corrective actions or reprogram funds as necessary.

The County requires that all entities responsible for implementing CDBG-DR projects perform all projects in a timely manner meeting all reporting and compliance measures. These entities must demonstrate capabilities and capacity to perform all duties required by contract with the County.

SECTION 15: AUDITS

Please refer to St. Clair County [Financial Policies and Procedures](#).

Audit Requirements

Audits are required for non-Federal entities that expend more than \$750,000 or more in a year of Federal awards. The County undertakes an annual outside audit performed according to the standards of [2 CFR 200.501](#). An outside audit pursuant to [2 CFR 200.501](#) is required for all sub-recipients expending \$750,000 or more a year. This requirement is included in all agreements. Audits must be undertaken annually.

Uniform Administration Requirements

The County complies with requirements set forth in the following: [2 CFR Part 200](#). This guidance establishes uniform administrative requirements, cost and audit requirements for Federal awards to all non-Federal entities. Nonprofit sub-recipients must comply with these requirements as well.

SECTION 16: FAIR PRACTICES AND ECONOMIC OPPORTUNITY

Non-Discrimination

St. Clair County shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source. The County maintains comprehensive internal Non-Discrimination and Affirmative Marketing Policies that guides staff practices and program implementation. This policy is used internally to ensure compliance with applicable laws and funder requirements. All other policies and procedure manuals can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

Section 3

If applicable, compliance with [Section 3](#) of the [Housing and Urban Development Act of 1968, as amended](#), and requirements outlined in the Universal Notice and [24 CFR Part 75](#). St. Clair County shall ensure that, to the greatest extent feasible, economic opportunities arising from CDBG-DR funded housing, infrastructure, and public construction projects are provided to Section 3 residents and businesses.

Section 3 Trigger

Section 3 requirements apply to any CDBG-DR–assisted housing rehabilitation, housing construction, or other public construction project when the total project cost exceeds \$200,000. The threshold is \$100,000 when assistance is provided through HUD’s Lead Hazard Control and Healthy Homes Programs. Contractor-level reporting applies when a contractor or subcontractor receives more than \$100,000 in CDBG-DR funds for work on a Section 3 project. Professional services (e.g., legal, accounting, architectural/engineering) are not subject to Section 3 labor hour reporting.

For purposes of Section 3, a project refers to the site or sites—together with any buildings or improvements located on the site(s)—that are under common ownership, management, and

financing. Applicability is determined at the project level. Section 3 requirements do not apply to materials supply contracts ([24 CFR 75.3\(b\)](#)) or to situations involving Indian and tribal preferences ([24 CFR 75.3 \(c\)](#)). Additional applicability considerations for public housing financial assistance are provided in [24 CFR 75.3 \(a\)](#).

Section 3 Residents include:

- Public housing residents
- Low- and very low-income persons residing in the metropolitan area or non-metropolitan county where the HUD-assisted project is located

Section 3 workers are defined as individuals who are:

- Low- or very low-income persons, as defined by HUD
- YouthBuild participants
- Employed within the past five years by a Section 3 business

Targeted Section 3 workers include:

- Those employed by a Section 3 business
- Residents of public housing or Section 8-assisted housing
- Persons residing in the project area or who qualify as homeless under McKinney-Vento

Section 3 businesses meet one of the following criteria:

- At least 51% owned by Section 3 workers
- Employ Section 3 workers for at least 75% of labor hours
- Subcontract more than 25% of the total award to Section 3 businesses

All entities performing or participating in CDBG-DR funded projects are required to follow the Section 3 requirements outlined in the Universal Notice and applicable federal regulations. Compliance will be monitored by the County through documentation review, labor hour tracking, and reporting in accordance with HUD guidance.

Section 3 Contract Clauses

All covered contracts and subcontracts associated with CDBG-DR funded projects must include the required Section 3 clauses outlining contractor responsibilities, labor hour reporting, recordkeeping, and compliance expectations as prescribed by [24 CFR Part 75](#) and HUD guidance.

To demonstrate compliance, contractors and subrecipients must document best efforts to meet Section 3 benchmarks:

- 25% of total labor hours worked by Section 3 workers
- 5% of total labor hours worked by targeted Section 3 workers

If these safe harbor benchmarks are met, the entity is considered compliant and does not need to report on best efforts. If benchmarks are not met, documentation of outreach, recruitment, and other efforts to achieve compliance must be maintained.

Section 3 Activities

To achieve Section 3 benchmarks, contractors and subrecipients may perform activities such as, but not limited to:

- Posting job opportunities at local community centers, workforce agencies, or online platforms
- Direct outreach to organizations serving low-income individuals, including YouthBuild programs
- Offering training, apprenticeships, or on-the-job learning opportunities
- Advertising subcontracting opportunities to Section 3 businesses
- Using local hiring agreements where feasible
- Connecting with local housing authorities, homeless service providers, or other partners who can identify eligible workers

These examples do not limit the types of efforts that may qualify as “best efforts.”

County Technical Assistance

St. Clair County will offer technical assistance to contractors and subrecipients to support Section 3 compliance. Assistance may include explanations of reporting requirements, labor hour tracking guidance, worker or business certification templates, and examples of eligible outreach and recruitment activities.

St. Clair County shall designate appropriate staff (Section 3 Compliance staff assigned to the project) responsible for overseeing compliance with Section 3 requirements for all applicable CDBG-DR activities. These designated staff will be responsible for reviewing Section 3 applicability and documentation, monitoring contractor and subcontractor reporting, and ensuring adherence to all Section 3 requirements under the [Universal Notice](#) and [24 CFR Part 75](#).

SECTION 17: UNIFORM RELOCATION REQUIREMENTS

The County shall ensure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, non-profit organizations, and farms) as a result of CDBG activities pursuant to [24 CFR 570.606](#).

The County’s Residential Anti-Displacement and Relocation Assistance Policy governs all applicable displacement and relocation activities, including those funded through CDBG-DR, and reflects the County’s commitment to minimizing displacement and ensuring compliance with applicable federal requirements. The policy can be located on the county’s website at [SCC Antidisplacement and Relocation Assistance Policy and Plan](#).

When contemplating any project or program, the County shall:

- Gather complete information identifying all tenants and owners who might be affected.
- Immediately inform any tenant or owner that they are entitled to information and counseling and they should not move unless specifically required to do so until they have received formal notices. Inform them that moving before that has occurred may cause them to give up rights.

Generally, a displaced person under the URA is an individual, family, partnership, association, corporation, or organization which moves from their home, business, or farm or move their

personal property, as a direct result of acquisition, demolition, or rehabilitation for a federally funded project. Relocation of displaced persons shall be in conformance with the [Uniform Relocation Assistance and Real Property Acquisition Act of 1970](#) as amended, [49 CFR Part 24 and Section 104\(d\) of the Housing and Community Development Act](#), and the [Universal Notice](#) requirements. The requirements shall be followed except for the waivers or alternative requirements are granted in the [Federal Register Notice Vol. 88 No. 96](#) dated May 18, 2023.

SECTION 18: FEDERAL LABOR STANDARDS & DAVIS-BACON WAGE RATES

Federal labor standards provisions are applicable to construction of public works financed in whole or in part with CDBG-DR funds, except that construction work involving residential property with less than 8 units is exempt. Federal labor standards provisions involve 4 key requirements:

1. Payment of not less than prevailing wage rates to all laborers and mechanics employed by contractors and subcontractors as required by Davis-Bacon and Related Acts;
2. Compensation for overtime hours (hours worked over 40 in a workweek at the site of the covered work) at no less than 1 ½ the regular basic rate of pay. The [Contract Work Hours and Safety Standards Act \(CWHSSA\)](#) applies to contracts over \$100,000 and requires overtime pay for hours worked over 40 in a workweek. It also mandates safe working conditions and imposes penalties for violations.
3. The certification and submission of weekly payroll reports for each week work is performed at the site of the covered work.
4. Contractors must also comply with the [Copeland "Anti-Kickback" Act](#), which prohibits improper wage deductions and requires weekly wage payments and submission of certified payrolls.

Both Federal and State Labor Standards and Prevailing Wages are included in applicable CDBG-DR bids and contracts distributed by the County. The County ensures that the correct Davis-Bacon wage determination is included in all bid and contract documents where Davis-Bacon applies. Davis-Bacon requirements apply to infrastructure projects and to residential projects only when the property contains eight (8) or more units. If a required classification is missing, the County will request an additional wage rate from HUD or the Department of Labor (DOL). Contractors are required to submit weekly certified payroll forms throughout the duration of work performed that document prevailing wages paid to all eligible employees. Certified payroll forms are reviewed by the Project Manager or designee for compliance with both federal and state prevailing wage requirements. Original certified payroll documents are retained by the County.

The County shall designate appropriate staff (Labor Compliance Officer associated with project) responsible for overseeing compliance with federal labor standards for the programs it administers. These designated staff will be responsible for reviewing wage determinations, conducting site visits and employee interviews, and ensuring adherence to applicable labor requirements.

Designated staff will report relevant findings and documentation to the program coordinator for review. In addition, internal monitoring will be conducted by the County's compliance monitor to ensure ongoing oversight and accountability.

The County will also comply with applicable local labor laws and regulations and will enforce the most stringent standard where federal, state, and local requirements differ. Violations of labor standards may result in sanctions, including withholding payments, contract termination, or referral to HUD or DOL for enforcement actions.

SECTION 19: INSURANCE REQUIREMENTS

All Contractors/Vendors/Developers/Sub-recipients, with the exclusion of internal County Departments, that will be receiving and/or administering CDBG-DR funds shall provide certificates of such insurance at the time of execution of contract:

1. Worker's compensation and employer's liability insurance as required by St. Clair County providing coverage for all claims.
2. Comprehensive automobile and vehicle liability insurance covering claims based on personal injuries, including death, and/or damages to property arising from use of motor vehicles, including onsite and offsite operations, and owned, non-owned, or hired vehicles, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
3. Commercial general liability insurance covering claims based on personal injuries, including death, or damage to property arising out of any act or omission of the Contractor/Vendor/Developer/Sub-recipient or of any of its employees, agents, or subcontractors, with not less than \$1,000,000.00 single limits and \$2,000,000.00 aggregate limits.
4. The St. Clair County shall be named as an additional insured and the Contractor/Vendor/Developer/Sub-recipient waives subrogation against the County as to said policies. The policies will provide that they will not be cancelled without 30 days prior notice to the County. The insurers will be authorized to do business in Illinois.

The Contractor/Vendor/Developer/Sub-recipient shall require the same insurances from its Sub-contractors. Developers of CDBG-DR funded projects that include acquisition and development shall provide the County with title abstracts as requested. In addition, the Developer shall provide and maintain title insurance on the property to the County in an amount equal to 100% of the grant amount.

Insurance requirements shall be consistent with applicable provisions of [24 CFR Part 570](#) and [2 CFR Part 200](#) and shall reflect best practices for risk management in federally funded acquisition and development projects. Title insurance shall be maintained in accordance with HUD guidance and local standards to ensure clear ownership and protection of public investment. While CDBG-DR does not require proof of ownership when grantees carry out recovery programs, HUD recommends that grantees obtain documentation to protect the CDBG-DR investment. Therefore, St. Clair County requires title insurance for acquisition and development projects to safeguard public funds and ensure clear property ownership.

SECTION 20: ENVIRONMENTAL REVIEW

CDBG-DR requires that an environmental review be completed for every activity before funds (even non-CDBG-DR funds associated with the activity) are committed or expended. Such environmental reviews must comply with the [National Environmental Policy Act of 1969](#) (NEPA) and the related authorities listed at [24 CFR Part 58](#) . An environmental review must be conducted considering federal laws, authorities, and regulations.

In accordance with [24 CFR Part 58](#) , recipients, owners, developers, sponsors or any other third party partners cannot take any physical actions on a site, begin construction, commit, expend, or enter into any legally binding agreements that constitute choice limiting actions for any HUD or non-HUD funds before the environmental review process has been completed and the jurisdiction has received a Release of Funds approval. Refer to St. Clair County IGD Environmental Policies And Procedures for further guidance which can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#) .

SECTION 21: FEMA IDENTIFIED FLOOD ZONES & NATIONAL FLOOD INSURANCE

The County includes a review of FEMA Flood Hazard Zone maps during the environmental review process. Each construction/rehabilitation/repair project will be individually evaluated for flood risk.

If a project is identified to be located within a FEMA Flood Zone, the County will ensure that any residential, commercial and/or infrastructure projects accounts for increased flood risk in accordance with the [Federal Flood Risk Management Standards](#) (FFRMS), as required by HUD's Final Rule.

CDBG-DR funds shall not be used for acquisition, construction, or rehabilitation of properties located within FEMA-designated floodways.

Funding will not be approved for acquisition or construction for use in any area that has been identified as having special flood hazards and is not participating in the National Flood Insurance program. Properties located within FEMA-designated [Special Flood Hazard Area \(SFHA\)](#) that receive CDBG-DR assistance must maintain flood insurance in perpetuity, regardless of changes in ownership. CDBG-DR funds shall not be used for properties or applicants who previously received federal disaster assistance, were required to maintain flood insurance, and failed to do so. Households with incomes exceeding 120% of the Area Median Income (AMI) who fail to obtain or maintain required flood insurance shall be ineligible for CDBG-DR flood disaster assistance.

These requirements are consistent with [24 CFR Part 55](#), the Flood Disaster Protection Act ([42 USC 4012a](#)), and the National Flood Insurance Reform Act ([42 USC 5154a](#)) . In addition to these federal requirements, all projects must comply with applicable state and local floodplain management regulations and permitting requirements.

SECTION 22: LEAD-BASED PAINT AND LEAD HAZARDS

The County may utilize CDBG-DR funds for housing projects, including acquisition and rehabilitation. Therefore, lead paint procedures will be in effect for all applicable activities. Projects that involve the acquisition or renovation of a property built prior to 1978 must be tested for lead based paint. Interim controls and safe work practices are required during construction. In addition, housing assisted with federal funds is subject to the:

- Prohibition of lead-based paint
- Testing all painted surfaces with a HUD approved XRF of any areas that will be disturbed in the renovation of houses built before 1978.
- Elimination of immediate lead-based paint hazards in residential structures
- Notification of the lead hazards of lead-based paint poisoning to purchasers and tenants of residential structures constructed prior to 1978 with the pamphlet [Protect Your Family from Lead in Your Home](#).

Paid renovators and multi-family housing maintenance workers who work in pre-1978 housing and child-occupied facilities will be required to meet the training and certification requirements of both HUD - Lead Safe Housing Rule ([LSHR](#)) and EPA - Renovation, Repair and Painting Rule ([RRP](#)). Paid renovators include renovation contractors, painters and other specialty trades.

Lead Based Paint and Homeowner Repair Program

The County will require that all eligible households requesting assistance through CDBG-DR undergo lead inspection and/or risk assessment for properties built prior to 1978, and where there are children residing in the home under the age of six (6). Inspections shall be conducted by a certified lead-based paint inspector, or a qualified Risk Assessor. The homeowner will be required to have the unit(s) abated if it is determined that lead or lead-based paint hazard conditions are present in the home. The County will not proceed with requests for assistance without a "Letter of Compliance" issued by a state-licensed lead inspector. Visual assessment alone will not be sufficient in meeting inspection requirements. The cost of lead inspections will be included as part of the rehabilitation cost and an inspection will be required when the Rehabilitation Specialist suspects or presumes the presence of lead has been determined for the property.

The County will allow exception to policy regarding lead-inspection and de-leading requirements when:

- A. Circumstances prove to be of an urgent nature. Emergency repairs needed to remove threats considered to be an imminent danger to human life, health or safety, or to protect the property from further structural damage are examples of these types of situations; or
- B. If the rehabilitation will not disturb any painted surface, the exception also applies.

The County will implement and operate its CDBG-DR program under the auspices of federal, state, and local laws, ordinances and systems that address lead poisoning prevention and/or abatement. The County will, as far as practicable, address the elimination of lead-based paint hazards in residential properties that receive federal rehabilitation assistance. Applicants must receive all required and appropriate notices and pamphlets regarding lead hazard information, as

well as notices concerning evaluation and lead hazard reduction activities. Acknowledgement forms, documenting all such notifications, shall be kept in each applicant's file.

Evaluation and hazard reduction requirements for homeowner rehabilitation will be determined among three categories based on the level of assistance and shall require paint testing on the painted surfaces to be disturbed or replaced during rehabilitation activities, or presume that all painted surfaces are coated with lead -based paint:

Level of Assistance	Required Actions
Up to and including \$5,000 per unit	Paint testing on disturbed/replaced surfaces, or presume all painted surfaces contain lead-based paint
More than \$5,000 and up to \$25,000 per unit	Paint testing or presumption; additional hazard reduction measures may apply
More than \$25,000 per unit	Paint testing or presumption; full abatement and clearance required

Note:

The level of assistance is determined by taking the lower of:

- Per unit rehabilitation hard costs (regardless of the source of funds), or
- Per unit Federal assistance (regardless of the use of funds)

Assistance of up to and including \$5,000 per unit

Projects where the level of rehabilitation assistance is less than or equal to \$5,000 per unit must meet the following requirements:

- The goal is to "do no harm." Therefore, all work must be conducted using lead safe work practices. Workers must be trained in lead safe work practices.
 - Lead Hazard Inspection/ Evaluation. A lead inspection must be performed, by a lead certified inspector, if determined there is lead presents, paint testing must be conducted to identify lead-based paint on painted surfaces that will be disturbed or replaced. Alternatively, the County may presume that these surfaces contain lead-based paint.
 - Lead Hazard Reduction. The County must repair all paint that will be disturbed during rehabilitation, unless such paint is found not to be lead-based paint.
- If lead-based paint is detected or presumed, safe work practices must be used during rehabilitation.
- Clearance is required by a certified clearance examiner.
- Notices that must be provided to owners and tenants:
 - The Lead Hazard Information pamphlet: [Protect Your Family from Lead in Your Home](#)

- The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
- The Notice of Lead Hazard Reduction.

In short, for rehabilitation projects where the level of assistance is less than or equal to \$5,000 per unit, workers must be trained in safe work practices, notices must be provided to owners and tenants, and clearance must be achieved.

Assistance of more than \$5,000 per unit and up to \$25,000 per unit

Projects where the level of rehabilitation assistance is between \$5,000 and \$25,000 per unit must meet the following requirements:

- The goal is to "identify and address lead hazards." A risk assessment is required to identify lead hazards and identified hazards must be addressed by interim controls.
 - Lead Hazard Evaluation. A risk assessment must be conducted by a qualified professional prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.
 - Lead Hazard Reduction. If the risk assessment identifies lead-based paint hazards, interim controls must be implemented to address lead-based paint hazards.
- Interim controls must be performed by qualified professionals using safe work practices.
- Clearance, conducted by a qualified clearance examiner, is required when lead hazard reduction activities are complete.
- Options: There are two options, as follows:
 1. The County is permitted to presume that lead-based paint is present and that lead-based paint hazards exist. In such cases, evaluation is not required. The County must perform standard treatments in lieu of interim controls on all applicable painted surfaces and presumed lead-based paint hazards.
 2. The County is also permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform interim controls on lead-based paint hazards created as a result of the rehabilitation work.)
- Notices that must be provided to owners and tenants:
 - The Lead Hazard Information pamphlet: [Protect Your Family from Lead in Your Home](#)
 - The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
 - The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting and budget.

Assistance of more than \$25,000 per unit

Projects where the level of rehabilitation assistance is over \$25,000 per unit must meet the following requirements:

- The goal is to "identify and eliminate lead hazards." A risk assessment is required to identify hazards and any identified hazards must be abated by a certified abatement professional.
 - Lead Hazard Evaluation. A risk assessment must be conducted prior to rehabilitation to find lead-based paint hazards in assisted units, in common areas that service those units, and on exterior surfaces. The risk assessment must include paint testing of any surfaces to be disturbed by the rehabilitation.
 - Lead Hazard Reduction. To address hazards identified:
 - Abatement must be conducted to reduce all identified lead-based paint hazards except those described below. Abatement must be conducted by a certified abatement contractor.
 - If lead-based paint hazards are detected during the risk assessment on the exterior surfaces that are not to be disturbed by rehabilitation, interim controls may be completed instead of abatement to reduce these hazards.
 - Clearance is required when lead hazard reduction activities are complete.
 - Options: There are two options, as follows:
 1. The County is permitted to presume that lead-based paint hazards exist. In such cases, a risk assessment is not required. The County must abate all applicable painted surfaces that will be disturbed during rehabilitation and all presumed lead hazards.
 2. The County is permitted to conduct a lead hazard screen instead of a risk assessment. The lead hazard screen has more stringent requirements and is only recommended in units in good condition. If the lead hazard screen indicates that there is no lead contamination, no lead hazard reduction is required. If the lead hazard screen indicates the presence of lead hazards, the County must then conduct a risk assessment. (Note: Passing a lead hazard screen, or a risk assessment, does not eliminate the requirement to perform abatement on lead-based paint hazards created as a result of the rehabilitation work.)
- Notices that must be provided to owners and tenants:
 - The Lead Hazard Information pamphlet: [Protect Your Family from Lead in Your Home](#)
 - The Notice of Evaluation (if paint testing is performed) or Notice of Presumption (if paint testing is not performed); and
 - The Notice of Lead Hazard Reduction.

In short, compliance with the Lead Safe Housing Rule for such rehabilitation projects will affect the project planning, timeline, scope of work, contracting, and budget. It involves the engagement of a certified abatement contractor.

SECTION 23: INCOME ELIGIBILITY

Direct beneficiaries of CDBG-DR funding must be income qualified to meet the HUD LMI National Objective. Their annual household income must not exceed 80% of the Area Median Income adjusted for household size. Annual household income is the anticipated total income from all sources received by the family head and spouse (even if temporarily absent) and by each additional member of the Family (other than children under the age of 18 years). Annual Income specifically includes and excludes certain types of income as set forth in, and shall be determined in accordance with the St. Clair County Intergovernmental Grants Department Community Development Block Grant Income Determination Procedure, which is maintained as an internal document and available upon request. The County follows HUD's [Income Limits](#) and utilizes the HUD [CPD Income Eligibility Calculator](#) to ensure compliance with [24 CFR 5.609](#) and HUD income determination requirements. Income shall be calculated using the IRS Form 1040 Adjusted Gross Income (AGI) method.

Documenting Income Eligibility and County Approval

The staff will document income eligibility using the IRS Form 1040 Adjusted Gross Income (AGI) method for CDBG-DR projects. When available, the applicant's most recent IRS Form 1040 may be used to determine income eligibility. Source documents such as wage statements, interest statements, and unemployment compensation statements, may be used if a 1040 as additional verification if necessary.

Eligibility determinations are based on anticipated income and prior-year tax returns alone do not constitute adequate documentation unless used under the AGI method. Calculations and copies of IRS Form 1040 or applicable source documents must be forwarded to the County for approval of income eligibility of a client.

SECTION 24: TERM AFFORDABILITY & CONTINUED AFFORDABILITY

The County may utilize CDBG-DR for housing activities, therefore, term affordability procedures will be in effect. The County requires that assisted units remain affordable for at least a minimum period. The County's minimum affordability periods are based on what is required in the federal HOME Investment Partnership Program [24 CFR 92.252\(a\), \(c\), \(e\) and \(f\)](#), and [24 CFR 92.254](#), and are as follows:

Amount of Assistance	Minimum Affordability Period
Up to \$15,000	5 Years
\$15,001 to \$40,000	10 Years
Over \$40,000	15 Years
New Construction	20 Years

For new construction projects, refer to the County’s New Construction Policies and Procedures , available on the St. Clair County Intergovernmental Grants Department website [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#), for applicable standards and procedures.

SECTION 25: MITIGATION SET-ASIDE

In accordance with HUD’s Universal Notice and [24 CFR Part 570](#) , St. Clair County shall allocate no less than 15% of its CDBG-DR funds toward eligible mitigation activities. These activities will be informed by the County’s 2024 Multi-Hazard Mitigation Plan (MHMP) which is referenced in the CDBG-DR Action Plan and was updated to reflect current and future risks including flooding, tornadoes, extreme heat, and severe storms.

Mitigation activities will be incorporated into infrastructure, housing, and economic development programs. All mitigation-funded projects must:

- Increase resilience to future disasters
- Reduce long-term risk of loss of life, injury, property damage, and hardship
- Align with the Mitigation Needs Assessment included in the County’s CDBG-DR Action Plan which can be located on the county website at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)

The County will ensure that mitigation activities meet CDBG-DR eligibility requirements, a national objective, and are documented in accordance with HUD guidance. Mitigation measures will be integrated into project design and implementation, including engineering standards, elevation requirements, and climate-resilient infrastructure improvements.

Compliance will be monitored through documentation review, project tracking, and reporting in the Disaster Recovery Grant Reporting (DRGR) system.

APPENDIX I: REQUEST FOR QUALIFICATIONS FOR ENGINEER SERVICES

ST. CLAIR COUNTY, ILLINOIS REQUEST FOR QUALIFICATIONS FOR ENGINEER SERVICES

ENGINEER EVALUATION CRITERIA

The Selection Committee will screen and rank all proposals. Interviews may be conducted as part of the ranking process. Proposals received in reply to this request will be evaluated using the following criteria and scored based on a maximum of 120 points. Price will not be a part of the Selection Committee's selection criteria in the procurement of engineer services; rather, qualifications will be evaluated, and the most qualified competitor will be selected, subject to negotiations of fair and reasonable compensation.

Qualifications	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	20
2. Executive Summary	20
3. Statement of Qualifications	20
4. Previous Experience with Sidewalk Projects	20
5. Previous Experience with CDBG-DR/ADA	20
6. Certifications	20
7. Total	120

FIRM:	Total Points
1. Cover letter addressing understanding of CDBG-DR & ADA	
2. Executive Summary	
3. Statement of Qualifications	
4. Previous Experience with Sidewalk Projects	
5. Previous Experience with CDBG-DR/ADA	
6. Certifications	
7. Total	

Printed Name of Scorer: _____

Signature: _____ Date: _____

APPENDIX II: TERMS

- A. **Legal Compliance:** Work performed, and plans produced shall comply with all state, environmental, statutory, legal process, OSHA, Davis Bacon and the Fair Labor Standards Act.
- B. **Acceptance of Proposal:** The County reserves the right to reject any and all proposals and to waive informalities, if, at its discretion, the interests of the county will be best served thereby.
- a) The County reserves the right to negotiate the specified dollar amount, or any portion of that amount. The County reserves the right to negotiate contract changes following the award.
 - b) If there is any conflict between these documents and the proposal, these documents shall control.
 - c) The County reserves the right to cancel this RFP in writing or postpone the date and time for submitting proposals at any time prior to the proposal due date. The County reserves the right to stop the project if it is in the best interest of the County.
 - d) No proposer shall have a right to make a claim against the County in the event the County accepts a proposal or does not accept any proposals.
- C. **Validity of Proposals:** Proposals must be valid for at least 60 days.
- D. **Insurance:** The Contract shall be effective only upon approval by the County of acceptable evidence of insurance required below, issued by insurers admitted within the State of Illinois. Such insurance shall be in force on the date of execution of this contract and shall remain continuously in force for the duration of the contract. The Engineer shall provide evidence of workers' compensation insurance covering its employees, and evidence of general liability insurance naming the County, its officers and employees as additional insurers under the policy, as follows:
- a) Workers' Compensation insurance that meets the statutory obligations.
 - b) Commercial General Liability insurance with limits of at least \$1,000,000 general aggregate, \$1,000,000 products - completed operations, \$1,000,000 personal and advertising injury, \$1,000,000 each occurrence, \$50,000 fire damage and \$5,000 medical expense any one person. The policy shall be on an occurrence basis, shall include contractual liability coverage and the County shall be named an additional insured. This coverage shall be maintained for one year after final completion and acceptance of the Project by the City.
- E. **Addenda to RFP:** Any changes, additions or clarifications to the RFP will be made by written Proposal addenda.
- a) Such addenda will be sent to all proposers receiving the original RFP and will become part of the Proposal package, having the same binding effect as provisions of the original proposal.
 - b) All addenda, amendments and interpretations of this solicitation shall be in writing. The County shall not be legally bound by any amendment or interpretation that is not in

writing. Only information supplied by the County in writing or in this RFP should be used in preparing Proposal responses. All contact that a proposer may have had before or after receipt of this RFP with any individuals, employees, or representatives of the County, and any information that may have been read in any news media or seen or heard in any communication facility regarding this proposal should be disregarded in preparing proposal responses.

c) The County does not assume responsibility for receipt of any addendum sent to proposers.

d) A copy of all addenda issued must be signed and returned with your proposal.

F. **Contract and Conditions:** The selected firm or individual will be required to enter into a contract with the County. Additional contract conditions may be required, depending upon the nature and extent of the services to be provided. The County reserves the right to negotiate a change or modification to any of the proposed contractual conditions.

APPENDIX III: ADDITIONAL RESOURCES

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

[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

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

To access additional information and resources

- [Flood Maps | FEMA.gov](#)
- [CDBG and CDBG-DR Income Limits - HUD Exchange](#)
- [Community Development Block Grant Disaster Recovery Grant Funds | HUD.gov / U.S.](#)
- [Protect Your Family from Lead in Your Home \(English\) | US EPA](#)

REVISION HISTORY

Event	Date
Adopted	7/18/2023
Adopted revisions	1/26/2026