

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

**Community Development Block Grant
(CDBG)**

PUBLIC FACILITIES

Policies And Procedures



Table of Contents

INTRODUCTION	4
KEY TERMINOLOGY AND COMMON ACRONYMS	5
PROGRAM OVERVIEW	9
PUBLIC FACILITY ELIGIBILITY FOR CDBG FUNDING	9
INELIGIBLE GOVERNMENT FACILITIES FOR CDBG FUNDING	9
PROGRAM AWARENESS	10
CITIZEN PARTICIPATION PLAN	10
<i>PUBLIC PARTICIPATION OPPORTUNITIES:</i>	10
PROJECT SELECTION AND AGREEMENT PROCESS	10
SELECTION PROCESS	10
PROJECT AGREEMENT PROCESS	11
PURPOSE	11
AGREEMENT PROCESS	11
AMENDMENTS & MODIFICATIONS:	12
NON-CDBG FUND REQUIREMENTS	12
PROCUREMENT STANDARDS AND COMPETITIVE BIDDING	12
PROCUREMENT COMPLIANCE AND COMPETITION	12
PROCUREMENT METHODS	13
CONFLICT OF INTEREST	13
REQUESTING A CONFLICT OF INTEREST EXCEPTION	14
CONTRACTOR ELIGIBILITY & DEBARMENT RESTRICTIONS	14
DEBARMENT AND SUSPENSION RESTRICTIONS	14
CONTRACTING REQUIREMENTS AND FAIR PRACTICES	15
EQUAL OPPORTUNITY	15
NON-DISCRIMINATION POLICY	Error! Bookmark not defined.
SECTION 3/MINORITY BUSINESS ENTERPRISE (MBE) REQUIREMENTS	15
LABOR STANDARDS AND CONSTRUCTION COMPLIANCE	16
BUILD AMERICA, BUY AMERICA ACT (BABA)	16
DAVIS-BACON COMPLIANCE	16
ENVIRONMENTAL REVIEW AND COMPLIANCE	16
FISCAL MANAGEMENT	17
SUBMITTING REIMBURSEMENTS (INVOICES)	17
COST ANALYSIS AND FINANCIAL OVERSIGHT	17

APPEALS AND GRIEVANCES	18
TYPES OF APPEALS & GRIEVANCES.....	18
GRIEVANCE & APPEALS PROCESS.....	18
RECORD-KEEPING REQUIREMENTS.....	19
SELF-MONITORING.....	20
APPENDIX I	21
PROGRAM FLOW.....	21
APPENDIX II.....	28
PHASES FOR PUBLIC INFRASTRUCTURE PROJECTS INVOLVING CDBG FUNDING	28
APPENDIX III	30
APPENDIX IV	31
PUBLIC FACILITIES SCORING SHEET	31
REVISION HISTORY	32

Introduction

St. Clair County Intergovernmental Grants Department (IGD)/ Community Development Division (CD) receives [CDBG: Community Development Block Grant](#) funds from the [U.S. Department of Housing and Urban Development \(HUD\)](#) to undertake community improvements, in furtherance of the objectives of the [Housing and Community Development Act of 1974](#), as amended.

The CDBG Program is authorized under Title I of the [Housing and Community Development Act of 1974](#), as amended. It was created as the first federal block grant to local governments through the consolidation of individual categorical HUD programs.

This program is designed to provide grants to states and local governments to support community development activities aimed at improving urban areas, particularly for low- and moderate-income residents. The primary objectives of Title I include:

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

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

Entitlement CDBG grantees must certify to HUD that the projected uses of CDBG funds, as proposed in their Consolidated Plan and respective Annual Action Plans, will address at least one of the three CDBG National Objectives ([24 CFR 570.208](#)):

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

Any activity proposed for CDBG funding must be eligible and must address at least one of the National Objectives. If a proposed eligible activity does not meet at least one of the National Objectives, it is not eligible for CDBG funding.

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

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

Key Terminology and Common Acronyms

Annual Action Plan

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

BABA

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

CAPER

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

CDBG

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

CFR

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

Citizen Participation Plan (CPP)

A required plan outlining how a community will involve residents in the CDBG planning process. St Clair County IGD/CD's current CPP can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

Consolidated Plan

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align

and focus funding from the CPD formula block grant programs. St Clair County IGD/CD's current Consolidated Plan can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

Davis-Bacon Act

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

Entitlement Community

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

Environmental Review (ER)

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

Grant Agreement

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

Grantee

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

HUD

The United States Department of Housing and Urban Development.

Low- and Moderate-Income (LMI)

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

Low- and Moderate-Income Area (LMA)

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

eligible neighborhood.

Low- and Moderate-Income Limited Clientele (LMC)

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

MBE

Minority-owned Business Enterprise.

National Objective

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

Procurement

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

Public Facilities

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

Quarterly Report

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

RFP

Request for Proposal

Section 3

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

Subrecipient

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

Subrecipient Agreement

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

URA

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

USC

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

WBE

Women-owned Business Enterprise

Program Overview

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

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

Public Facility Eligibility for CDBG Funding

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

CDBG-funded public facilities:

Category	Examples	Key Considerations
Infrastructure Improvements	– Water and sewer systems – Streets and sidewalks – Drainage and flood control – Street lighting – Utility lines	– Must benefit LMI areas or populations
Public Buildings	– Community centers – Libraries – Health clinics	– Must be publicly owned or operated for public benefit – Municipalities must request ADA projects

Ineligible Government Facilities for CDBG Funding

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

barriers under [24 CFR 570.201](#) even within such government buildings, to improve accessibility.

Program Awareness

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

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

Citizen Participation Plan

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

Public Participation Opportunities:

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

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

Project Selection and Agreement Process

Selection Process

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

- 1) Public Comment and Approval ([24 CFR 91.105](#)).
 - Publish a draft of the plan on the county's website, located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#) for public comment for a 30 day public comment period
 - Holds a public hearing, in accordance with the city's Citizen Participation Plan ([24 CFR 91.105](#)).
 - After incorporating public feedback, the final Annual Action Plan must be approved by the County Board Chairman and submitted to HUD for review and approval.
- 2) Application Review and Scoring
 - IGD staff will review applications for eligibility based on criteria that align with [24 CFR 570.208](#), [24 CFR 570.207](#), [24 CFR 570.201](#), [24 CFR 570.200](#)

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

3) Award Notification

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

Project Agreement Process

Purpose

The agreement specifies what the subrecipient or contractor must do in exchange for receiving grant funds, including any reporting requirements to demonstrate regulatory compliance.

It is the responsibility of the IGD/CD staff to ensure that:

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

The written agreement serves as a critical management tool for:

- Verifying compliance with HUD regulations
- Monitoring subrecipient performance
- Ensuring proper documentation of expenditures

Agreement Process

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

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

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

These agreements establish:

- Project scope and budget
- Performance expectations
- Reporting and compliance requirements
- Procurement and financial controls
- Record-keeping requirements

Amendments & Modifications:

These agreements must be amended as needed to reflect:

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

Amendments must be authorized by IGD.

Non-CDBG Fund Requirements:

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

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

Procurement Standards and Competitive Bidding

St. Clair County IGD procurement policies align with federal, state, and local regulations. St. Clair County IGD Financial Policies and Procedure Manual and Risk Assessments can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#). IGD is responsible for maintaining oversight to ensure compliance with all applicable procurement requirements.

Procurement Compliance and Competition

All procurement transactions must be conducted in a manner ensuring full and open competition, per [2 CFR 200.319](#) and [2 CFR 200.320](#). All procurement transactions will also adhere to St. Clair County Intergovernmental Grants Department Financial Policies and Procedures Manual & Risk Assessments located at [St. Clair County Illinois > Departments > Intergovernmental Grants >](#)

Community Development (RC Version: 9.13.3.0). The following practices are prohibited as they restrict competition:

- Imposing unreasonable requirements on businesses to qualify.
- Requiring excessive experience or bonding.
- Allowing non-competitive pricing practices.
- Awarding non-competitive contracts to consultants on retainer.
- Creating conflicts of interest.
- Specifying only brand-name products without allowing equivalent alternatives.
- Arbitrary actions in the procurement process.

All procurement solicitations must include a clear and accurate description of the material, product, or service to be procured, in accordance with 2 CFR 200.319.

Procurement Methods

Procurement methods must comply with 2 CFR 200.320. If local procurement policies are more restrictive, the more stringent standard will apply.

A. Informal Procurement Methods

- a) Micro-purchases (< \$4,999 in aggregate/ \$2,000 if the purchase is subject to the requirements of Davis Bacon): Micro-purchases may be made without soliciting competitive quotation if IGD considers the price to be reasonable.
- b) Small purchases (\$5,001 - \$25,000): Requires at least three competitive price quotes/bids. County or State procurements can be used in lieu of the three written bids.

B. Formal Procurement Methods (>\$25,001)

- a) Sealed Bids: Used when price is the primary selection factor. Requirements:
 - Public advertisement with adequate response time
 - At least two responsible bidders
 - Fixed-price contract awarded to the lowest responsive bidder
 - All bids must be publicly opened at the designated time/place
- b) Proposals (RFPs): Used when price and other factors are evaluated. Requirements:
 - Public solicitation
 - Clear evaluation criteria
 - Award based on best value to IGD
 - For architectural and engineering services, selection may be based on qualifications rather than price
- c) Non-Competitive Procurement: Allowed only under these conditions:
 - Sole-source provider
 - Public emergency
 - Inadequate competition despite solicitation efforts
 - HUD-approved waiver

Conflict of Interest

In accordance with 2 CFR 200.318, 24 CFR 570.611 and 24 CFR 92.356, no IGD/CD employee, officer, or agent may participate in the selection, procurement, award, administration of a contract

supported by CDBG funds if a real or apparent conflict of interest exists. if they have a real or apparent conflict of interest, including:

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

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

HUD may grant limited exceptions to these restrictions under [24 CFR 570.611\(d\)](#).

Requesting a Conflict of Interest Exception

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

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

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

Contractor Eligibility & Debarment Restrictions

Debarment and Suspension Restrictions

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

General contractors are required to:

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

Contracting Requirements and Fair Practices

Equal Opportunity

The regulations pursuant to Title I of the [Housing and Community Development Act of 1974](#) , as amended, require CDBG recipients to assure, through certification to the [U.S. Department of Housing and Urban Development \(HUD\)](#), that all activities will be conducted in accordance with [Section 109 of the Act](#) , [Title VI of the Civil Rights Act of 1964](#), [Executive Order No. 11246](#) , and [SECTION 3](#) of the [Housing and Urban Development Act of 1968](#) . More responsibilities have been placed on the local governments to carry out housing and community development decisions.

Non-Discrimination Policy

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

Section 3/Minority Business Enterprise (MBE) Requirements

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

HUD has mandated that the CDBG Program in St. Clair County take all necessary, affirmative steps to ensure awarded contractors make efforts to encourage the use of minority and women business enterprises, referred to as a Minority Business Enterprise (MBE). The IGD/ CD has set an overall goal of fifteen percent (15%) for the Minority Business Utilization Rate. The CDBG Public Facilities Project shall include, to the maximum extent possible, the use of minorities and women, and entities owned by minorities and women, including, without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts entered into as a result of the CDBG funding.

.

Labor Standards and Construction Compliance

Build America, Buy America Act (BABA)

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

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

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

Davis-Bacon Compliance

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

1) Prevailing Wage Determinations:

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

2) Applicability Across Projects:

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

3) On-Site Compliance & Enforcement:

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

Environmental Review and Compliance

The CDBG-Public Facilities project must comply with the environmental review requirements outlined [24 CFR Part 58](#). These requirements are detailed in St. Clair County IGD/CD's Environmental Policies and Procedures, which can be accessed at: [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

Fiscal Management

Submitting Reimbursements (invoices)

- **Invoice Submission:**

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

- **Required Documentation:**

Invoices must be accompanied by sufficient supporting documentation, including:

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

- **Reimbursement Process:**

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

Cost Analysis and Financial Oversight

- **Cost and Price Analysis:**

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

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

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

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

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

- c) **Industry profit rates:**

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

- d) **Past performance:**

Considering the contractor's history of performance on similar projects

- e) **Degree of subcontracting**

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

- **Reconciliation of Expenses:**

IGD will ensure that all expenditures align with the approved project budget. Any

discrepancies or overages must be addressed with an explanation and justification.

Appeals and Grievances

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

Types of Appeals & Grievances

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

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

Grievance & Appeals Process

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

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

Record-Keeping Requirements

Accurate and thorough record-keeping is essential to ensure compliance with federal regulations and facilitate reviews and audits related to the administration of Community Development Block Grant (CDBG) funds. This section outlines the record-keeping requirements to ensure transparency, accountability, and compliance with applicable laws and regulations, including [24 CFR 570.490](#).

Category	Required Records
General Administration	– Award Letter – Application – Executed Written Agreements & Amendments – Eligibility and National Objective Determinations – Environmental Review (Executed) – Notice to Proceed
Procurement & Contractor Selection	– Procurement Method Rationale – Contract Selection Criteria – Contractor Evaluations and Decisions – Cost or Price Analysis Results – Procurement Policy and Documentation – Bid Tabulation & Award – Bids Received (minimum of three) – Pre-Bid Sign-In Sheet – Bid Advertisement – Cost Analysis & Specifications – Change Orders (if applicable)
Financial & Compliance	– Financial Records Detailing CDBG Fund Use – Documentation of Funding Decisions and Selection Criteria – Certified Payrolls (General Contractor/Subcontractors) – Payment Bond (General Contractor) – Executed Contracts (General Contractor-Subcontractor & Subrecipient-General Contractor) – Compliance Records (including demographic data) – EPLS Verification (www.sams.gov) (General Contractor & Subcontractor) – Contact Sheets & List of Subs (General Contractor, Subcontractor) – CDBG Certifications
Labor Standards & Section 3 Compliance	– Labor Standards Compliance Documentation – Davis-Bacon Wage Decision and Interviews (All Workers on Project) – Section 3 Reports (Monthly)

Category	Required Records
Public Access & Transparency	Records of Past Use of CDBG Funds (available to the public per state/local privacy laws)

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

File Retention

Records shall be retained for a minimum period of three years from the closeout of the grant or for the period required by other applicable laws and regulations, including those outlined in [24 CFR 570.487](#). Supporting documentation must be maintained to verify compliance with programmatic and financial requirements.

Self-Monitoring

The St Clair County Intergovernmental Grants Department (IGD)/ Community Development Group (CD) is responsible for ensuring that HOME funds are used in accordance with [24 CFR Part 570](#), [CPD Monitoring Handbook \(Chapter 3: Exhibit 3-25\)](#), [\(HUD\) U.S. Department of Housing and Urban Development](#), and all program requirements and written agreements. The IGD/CD shall take appropriate action when performance problems arise. Compliance monitoring will be conducted by the St. Clair County Intergovernmental Grants' Department Group's Community Development Group. Through self-monitoring, the Community Development Group can regularly assess its operations, identify areas for improvement, and address deficiencies proactively, well before external monitoring or reviews take place. The goal is to uphold the highest standards of compliance, efficiency, and effectiveness, ensuring all activities align with HUD's policies and the applicable regulations. Details of compliance monitoring are outlined in the Policy and Procedure Manual for Compliance Monitoring, available on [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

Appendix I

Program Flow

PART 1: SURVEYS

1) SURVEYS.

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

PART II: PROJECT PROCUREMENT

1) PUBLIC FACILITIES APPLICATION FORMS REVIEWED.

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

2) PUBLIC FACILITIES APPLICATIONS MAILED.

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

3) APPROXIMATE FUNDING WILL BE DECIDED UPON.

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

4) TECHNICAL ASSISTANCE MEETING HELD.

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

5) COMPLETED APPLICATIONS RETURNED TO IGD.

Communities/Townships will be given approximately 9 to 10 weeks to complete and return applications (usually Late- March). A deadline is included in the application. Applications received after the deadline will be held but will not be reviewed or considered for award. When applications are received and date stamped, they are to be given to the Budget Analyst. The Budget Analyst will collect, log the applications, confirm low/moderate income percentages, and prepare the review cover sheet for each application.

6) COMPLETED APPLICATIONS REVIEWED.

IGD staff will review applications for eligibility and will score them based on a rating sheet that uses factors including community need, past performance, and percentage of low/mod income population. All projects must be eligible under Code of Federal Regulations (24CFR, 570.200(a) (2); 570.201; 570.207 & 570.208). Only eligible projects will be reviewed and ranked. The scoring is only a general indication of the critical need to fund the project, and highest-scoring projects may not necessarily be recommended. Only communities or townships are eligible to submit an application. Other entities, eligible entities/activities IGD may fund are listed in the public facilities application may seek support from a community/township in which they are located to submit an application on their behalf. The staff recommendations are given to the Community Development Coordinator and IGD Executive Director for their review. They may modify the staff recommendations of eligible projects, regardless of scoring, based on their knowledge of County needs. The highest-scoring eligible projects may not necessarily be recommended. The Executive Director will review the projects with the County Board Chairman for approval. Recommendations may be submitted to the County Board Grants Committee (usually in May or June) for approval. He may also modify staff recommendations, based on his knowledge of County needs. The highest-scoring projects may not necessarily be selected for County Board approval.

7) COUNTY BOARD APPROVES ACTION PLAN AND BUDGET.

IGD will prepare ranking sheets, budget and action before sending to the County Board Chairman for approval.

8) CONGRATULATORY LETTERS SENT.

IGD staff will prepare letters for the County Board Chairman's signature to send to communities/townships receiving funding recommendations for the next program year, pending the County receiving CDBG funds. This is not an "Authorization to Proceed Letter". It states that IGD will be in contact with funded communities.

9) REGRET LETTERS SENT.

IGD staff will prepare letters for the IGD Executive Director's signature to send to those communities whose project applications were not funded, including applications submitted after the date/time deadline. Again, if required information is not provided by the specified deadlines the application will be denied. Extensions of time are only granted for extenuating circumstances and must be approved by the CDBG Coordinator. There are no exceptions/appeals if the file is denied for inadequate documentation. Any other appeals must be submitted in writing within 20 days of the date of the regret letter.

10) RESULTS ADDED TO DRAFT ANNUAL ACTION PLAN.

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

PART III: PUBLIC FACILITIES CONTRACT ADMINISTRATION

1) ENVIRONMENTAL REVIEWS COMPLETED

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

2) PROJECT BUDGET PREPARED

The IGD staff assigned to the community prepares budget/job costs on each contract

3) CONTRACTS WRITTEN

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

4) IN-HOUSE REVIEW BEGINS

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

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

5) CONTRACTS ARE SENT TO COMMUNITIES

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

6) IDIS SET-UP

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

7) IGD BID REQUIREMENTS PACKAGE PREPARED

IGD staff assembles a “Project Bid Package”, which should include Davis-Bacon (Prevailing Wage) Wage Decisions, and IGD Bid Specification Requirements (Front-end Documents).

The package is sent to the community engineering firm responsible for the project. The “Project Bid Package” will be included in the community bid package, following federal, state and local procurement requirements.

8) PLANS AND SPECIFICATIONS REVIEWED

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

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

10) PRE-CONSTRUCTION CONFERENCE SCHEDULED

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

11) PROJECT IS MONITORED

IGD staff will:

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

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

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

following entities:

1. Contractors
2. Subcontractors
3. Suppliers

12) PROJECT COMPLETION

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

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

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

PART IV: CHANGE ORDERS/CONTRACT AMENDMENTS

Change Orders

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

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

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

Time extension requests

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

should contain the reason for the extension request.

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

Scope or Location

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

Substantial Changes

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

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

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

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

Auditor Requests for Information

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

Closeout

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

Appendix II

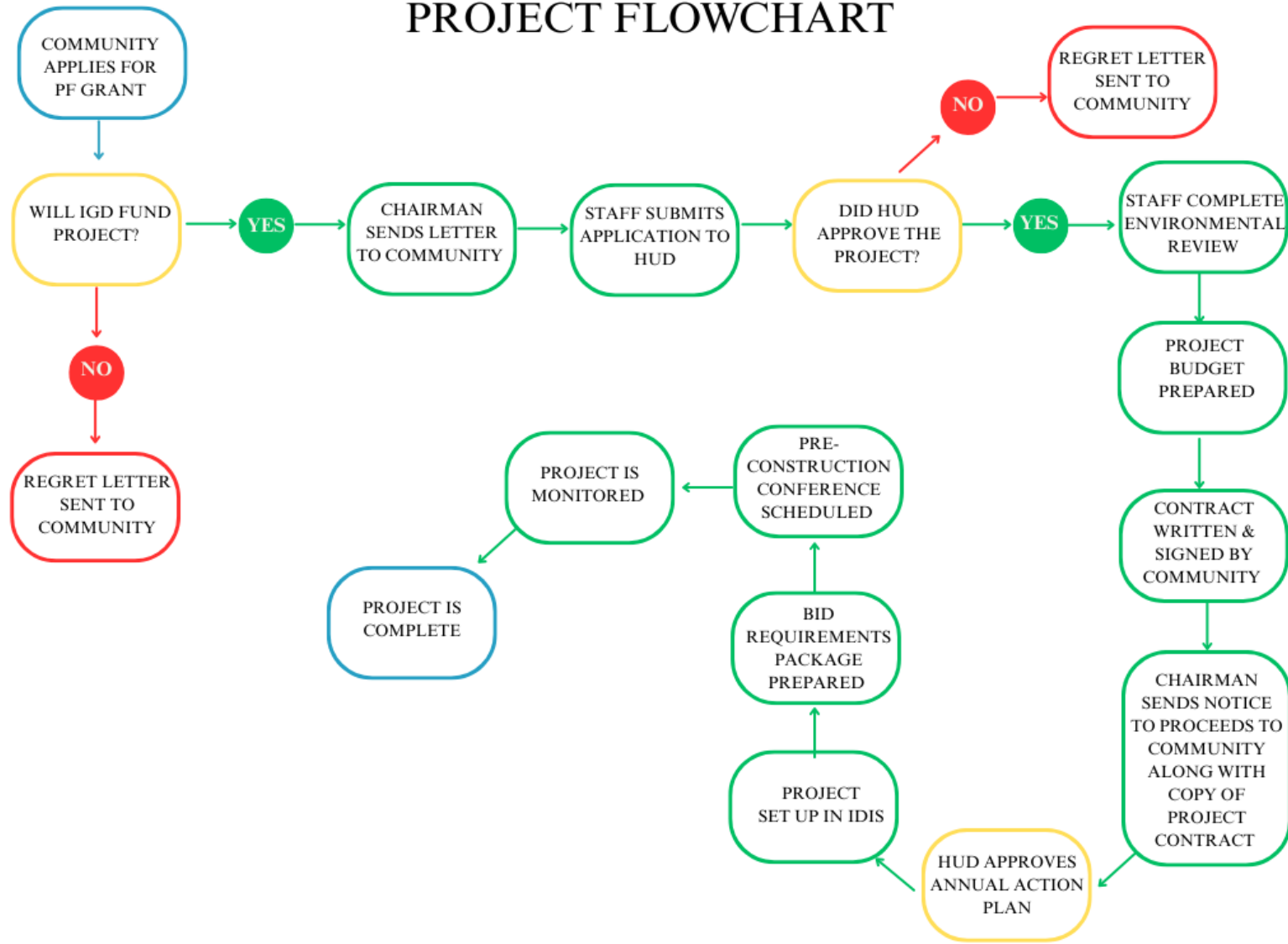
Phases For Public Infrastructure Projects Involving CDBG Funding

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

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

Appendix III

PROJECT FLOWCHART



Appendix IV

Public Facilities Scoring Sheet

COMMUNITY _____

PROJECT TYPE _____

REVIEWED BY _____

PART A. PROJECT BENEFIT

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

POSSIBLE POINTS: 28 **EARNED POINTS:** _____

PART B. LOW/MOD INCOME BENEFIT

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

POSSIBLE POINTS: 10 **EARNED POINTS:** _____

PART C. FINANCIAL NEED

1. Local capacity _____ (10 max)

POSSIBLE POINTS: 10 **EARNED POINTS:** _____

PART D. RESOURCE LEVERAGING

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

POSSIBLE POINTS: 12 **EARNED POINTS:** _____

PART E. LOCAL BONUS POINTS _____ (15 max)

POSSIBLE POINTS: 15 **EARNED POINTS:** _____

PART F. EFFORT AND CAPACITY

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

POSSIBLE POINTS: 25 **EARNED POINTS:** _____

MAXIMUM POSSIBLE POINTS: 100	TOTAL:	(100 max)
-------------------------------------	---------------	------------------

Revision History

Event	Date
Adopted	
Adopted revisions	
Adopted revisions	