Certified Grant Administrator Training
June 16-18, 2020
Good Morning!!
We made it through Day 1
Let’s pause for a moment to recap some things.
Questions from yesterday’s presentation?

Type additional questions in skype, time permitting we will review.
Chapter 10 Construction Management and Labor Standards
Labor Standards Training, Targets and Objectives

After this training you should understand...

- Statutory Provisions
- General Labor Standards Requirements
- Basic Terminology
- Necessary Forms
- Red Flags
Statutory Provisions

• Davis Bacon Act (DBA) and Davis Bacon Related Acts (DBRA)

• Contract Work Hour Safety Standard Act (CHWSSA)

• Copeland Act (Kickback)
The **Davis-Bacon Act** (DBA) and **Related Acts** (DBRA), apply to contractors and subcontractors performing on federally funded or assisted **contracts in excess of $2,000** for the construction, alteration, or repair (including painting and decorating) of public buildings or public works.

Davis-Bacon Act and Related Act contractors and subcontractors must pay their laborers and mechanics employed under the contract:

- No less than wages including fringe benefits prevailing in the locality on projects of a similar character as determined by the Department of Labor (DOL)
- Wages not less often than once per week; and
- Post the applicable wage decision at the job site
Copeland (anti-kickback) Act (CA)

Applicable to contracts/projects subject to Davis-Bacon requirements. The Copeland (anti-kickback) Act

- Regulates deductions that may be taken from employee earnings
- Requires certification, submission and retention of weekly certified payroll reports
- Prohibits “kickbacks” from employee earnings
- Applies to contractors and subcontractors
Contract Work Hours and Safety Standards Act (CWHSSA)

- CWHSSA is applicable to prime contracts valued in excess of $100,000. Any subcontracts covered by a prime contract are likewise covered.

- CWHSSA in part, mandates overtime plus fringe benefits for hours worked on site of covered work in excess of 40 hours per week.

- Requires premium overtime pay only when all hours considered under CWHSSA overtime requirements – 40 hours plus (O/T) hours- are performed on CWHSSA-covered site(s) of work.

- Imposes liquidated damages at the rate of $25 per day/per violation (effective August 1, 2016)– any instance where employees work in excess of 40 hours per week on a daily basis in addition to full wage compensation.
General Labor Standards Requirements

There are 3 main requirements that must be included in a CDBG construction contract:

1. Labor Standards Provisions (DBRA Packet, form 4-R)
2. The applicable Wage Determination
3. Contract Special Provisions (form 4-L)

Why are the Labor Standards Provisions (DBRA Packet, Form 4-R in the GAM) important to include in all bids and contracts?

They establish layers of protection related to:

- Minimum wages
- Withholding of funds
- Access to payroll records
- Subcontractor requirements
- Apprentice requirements
- Overtime requirements
Wage Determinations (WD)

A Wage Determination is the listing of wage rates and fringe benefit rates for each classification of laborers and mechanics which the Department of Labor has determined to be prevailing in a given area for a particular type of construction.

- Maintained by DOL research
- Change through updates and modifications
- Lasts the life of the project
- Responsibility of the Community
  - Verified by the CDBG Program Specialist

Failure to include WD does not relieve agency or contractor from liability of restitution or back wages due laborers and mechanics.

Use of incorrect WD; agency shall either terminate and/or re-solicit the contract with the valid wage determination.
Wage Decisions are essentially construction categories that are defined by the character of the work being completed.

There are 4 types of Wage Decisions:

1. **Residential** – single family homes and apartment buildings, 4 stories or less
2. **Building** – commercial, and residential buildings greater than 4 stories
3. **Highway** – repair of roads, streets, parking areas and most paving not incidental to residential, building or heavy construction
4. **Heavy** – Catch-all which includes projects not classified as the previous 3, i.e., parks, dredging, sanitary and storm sewers, dams
# Construction Category Samples

**SAMPLES OF PROJECTS AND CATEGORIES**

*Excerpts from “Davis Bacon Construction Wage Determinations Manual of Operations”*

<table>
<thead>
<tr>
<th>Building Construction</th>
<th>Heavy</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Apartment buildings 5 stories and above</td>
<td>- Bridges</td>
</tr>
<tr>
<td>- Non-Residential use (offices, etc.)</td>
<td>- Canals</td>
</tr>
<tr>
<td>- Nursing Homes</td>
<td>- Demolition (not incidental to construction)</td>
</tr>
<tr>
<td>- Arenas/Auditoriums/Civic Centers</td>
<td>- Docks</td>
</tr>
<tr>
<td>- Automobile parking garages</td>
<td>- Drainage or creting projects</td>
</tr>
<tr>
<td>- Hospitals</td>
<td>- Electrification projects</td>
</tr>
<tr>
<td>- Industrial/Institutional buildings</td>
<td>- Flood control</td>
</tr>
<tr>
<td>- Libraries/Schools</td>
<td>- Land leveling/reclamation</td>
</tr>
<tr>
<td>- Mausoleums</td>
<td>- Locks, waterways/unsheltered piers</td>
</tr>
<tr>
<td>- Hotels/motels</td>
<td>- Pipelines</td>
</tr>
<tr>
<td>- Museums</td>
<td>- Pumping stations</td>
</tr>
<tr>
<td>- Office Buildings</td>
<td>- Railroad construction</td>
</tr>
<tr>
<td>- Police Stations</td>
<td>- Reservoirs/riparians</td>
</tr>
<tr>
<td>- Post Offices</td>
<td>- Sewage, collection, and disposal lines</td>
</tr>
<tr>
<td>- City Hall/Courthouses</td>
<td>- Water and sewage treatment plants</td>
</tr>
<tr>
<td>- Detention Facilities</td>
<td>- Shoreline maintenance</td>
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<tr>
<td>- Dormitories</td>
<td>- Swimming pools</td>
</tr>
<tr>
<td>- Fire Stations</td>
<td>- Subways (not the buildings)</td>
</tr>
<tr>
<td>- Restaurants</td>
<td>- Tunnels</td>
</tr>
<tr>
<td>- Subway Stations</td>
<td>- Water mains</td>
</tr>
<tr>
<td>- Shopping centers</td>
<td>- Wells</td>
</tr>
<tr>
<td>- Theaters</td>
<td>-</td>
</tr>
<tr>
<td>- Water and sewage treatment plant (building only)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Residential Construction</th>
<th>Highway</th>
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</thead>
<tbody>
<tr>
<td>- Apartment buildings 4 floors or less:</td>
<td>- Alleys</td>
</tr>
<tr>
<td>- Single family homes</td>
<td>- Bituminous treatments</td>
</tr>
<tr>
<td>- Town or row houses</td>
<td>- Concrete pavements</td>
</tr>
<tr>
<td>- Mobile home developments</td>
<td>- Curbs</td>
</tr>
<tr>
<td>- Multifamily houses</td>
<td>- Excavation and embankment</td>
</tr>
<tr>
<td>-</td>
<td>- Fencing (highway)</td>
</tr>
<tr>
<td>-</td>
<td>- Grade crossing elimination (over &amp; under passes)</td>
</tr>
<tr>
<td>-</td>
<td>- Parking lots</td>
</tr>
<tr>
<td>-</td>
<td>- Resurfacing streets and highways/Paving</td>
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<tr>
<td>-</td>
<td>- Roadways, and shoulders</td>
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<tr>
<td>-</td>
<td>- Guardinis</td>
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<tr>
<td>-</td>
<td>- Highway signs</td>
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<tr>
<td>-</td>
<td>- Highway Bridges</td>
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<tr>
<td>-</td>
<td>- Medians</td>
</tr>
<tr>
<td>-</td>
<td>- Trails</td>
</tr>
</tbody>
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1. For Davis Bacon purposes, the exterior height of residential buildings in terms of stories is a primary consideration. The following criteria will apply in order to determine height:
   - Basement-stories below grade used for storage, parking, mechanical system/equipment, etc. are considered basement stories are not used in determining height.
   - First story- A lowermost story considered a story if it contains the main entrance, is used for apartment space in a way substantially similar to upper floors; contains at least 50%, living accommodations or related non-residential uses, etc.

2. Subject to variations in classification in exceptional instances as deemed by the U.S. DOL (e.g. “character similar,” etc.)

**NOTE:** There are some instances in which “LANDSCAPING” is a separate sub-category.
Where to Find a Davis Bacon Wage Determination

Wage Determinations can be found at: https://beta.sam.gov/

What Can I Do Here?

Contracting

**Contract Data Reports (FPDS Reports)**
This website will officially replace FPDS.gov reports.
- Learn About Contract Data Reports
- Run Contract Data Reports

**Contract Opportunities (FBO)**
This website has officially replaced FBO.gov.
- Learn About Contract Opportunities
- Search Contract Opportunities

**Wage Determinations (WDOL)**
This website has officially replaced WDOL.gov.
- Learn About Wage Determinations
- Search Wage Determinations
Sample Prevailing Wage Determinations

MI160021 MOD 0 REVISED 07/22/16 MI21
********* THIS WAGE DETERMINATION WAS REPLACED ON 07/22/16*********
General Decision Number: MI160021 01/08/2016

Superseded General Decision Number: MI20150021

State: Michigan

Construction Type: Residential

County: Saginaw County in Michigan.

RESIDENTIAL CONSTRUCTION PROJECTS (consisting of single family homes and apartments up to and including 4 stories).

Note: Under Executive Order (EO) 13658, an hourly minimum wage of $10.15 for calendar year 2016 applies to all contracts subject to the Davis-Bacon Act for which the solicitation was issued on or after January 1, 2015. If this contract is covered by the EO, the contractor must pay all workers in any classification listed on this wage determination at least $10.15 (or the applicable wage rate listed on this wage determination, if it is higher) for all hours spent performing on the contract in calendar year 2016. The EO minimum wage rate will be adjusted annually. Additional information on contractor requirements and worker protections under the EO is available at www.dol.gov/whd/govcontracts.

Modification Number Publication Date
0 01/08/2016
Sample Prevailing Wage Determinations (continued)

<table>
<thead>
<tr>
<th>Code</th>
<th>Date</th>
<th>Description</th>
<th>Rates</th>
<th>Fringes</th>
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</thead>
<tbody>
<tr>
<td>BRIL0021-012</td>
<td>06/01/2009</td>
<td>Pointer, cleaner and caulkier.</td>
<td>$ 39.20</td>
<td>18.51</td>
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<tr>
<td>CARP0555-001</td>
<td>06/01/2012</td>
<td>Carpenter, Lather, Millwright, Piledriver, and Soft Floor Layer</td>
<td>$ 41.52</td>
<td>25.47</td>
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<tr>
<td>CARP0555-002</td>
<td>10/01/2012</td>
<td>Carpenter (Excluding structures with elevators and structures over 3 1/2 stories)</td>
<td>$ 32.12</td>
<td>25.47</td>
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<tr>
<td>ELEC0009-003</td>
<td>06/03/2013</td>
<td>Line Construction Groundman</td>
<td>$ 34.98</td>
<td>20.80</td>
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<td></td>
<td></td>
<td>Lineman &amp; Equipment Operator</td>
<td>$ 44.85</td>
<td>26.67</td>
</tr>
<tr>
<td>ELEC0134-001</td>
<td>06/04/2012</td>
<td>Electrician</td>
<td>$ 42.00</td>
<td>26.75</td>
</tr>
</tbody>
</table>
What do I do if a job classification on my project is missing?

1. Request a letter on letterhead from the contractor that states the classification, job duties, and rate/fringe requested

2. Complete HUD Form 4230A
   • (Form 10-M in the GAM) → → →

3. Save a copy of the Wage Determination being used for the project

4. Submit an email request to your Program Specialist and **attach the 3 items above**

5. Look for email verification from your Program Specialist that the request was submitted to HUD

6. Wait (DOL has 30 days to respond)
Wage Determination Lock-in Dates

1. **Bid Opening** (10 Day Check)
   - Labor Compliance Officer must verify any change in the wage decision 10 days prior to bid opening.

2. **Contract Award** (Contract Execution)
   - A contract not awarded within **90 days** after bid requires a new wage decision be pulled prior to contract award.
   - Projects where there is no **Prime Contractor** must obtain a wage decision within **10 days** prior to executing individual contracts above $2,000.

3. **Construction Start**
   - Where there is NO bid opening or contract award, the very first day of construction locks the wage determination in.
   - A payroll must be submitted documenting the work done.
   - If construction start does not happen within **90 days** after contract execution contact the Program Specialist to identify if a new wage decision needs to be pulled prior to construction start.
Required Postings

1. The Wage Determination needs to be posted in plain view of all on-site workers.

2. The DOL WH-1321 Notice to Employee poster must also be posted in plain view of all on-site workers.

https://www.dol.gov/whd/programs/dbra/wh1321.htm
Checking contractor eligible is a regulatory requirement and must be done PRIOR to executing any/all Prime or Subcontracts.

The eligibility check is completed by going to the sites listed below and entering the legal business name:

- www.sam.gov

Verification must be kept in the file with the contract and submitted to the CDBG Program Specialist.
Common Definitions & Interpretations

- Site of Work
- Labors and Mechanics
- Working Foreman
- Apprentices and Trainees
- Truck Drivers
Site of Work

- The physical place or places where the building or work called for in the contract will remain, and any other site where a significant portion of the building or work is constructed, provided that such site is established specifically for the performance of the contract or project.

- DBA applies only to those laborers and mechanics employed by a contractor or subcontractor on the “site of work”.

- CWHSSA has no “site of work” limitation. An employee performing part of the contract work under a construction contract at the job site who then continues contract work at a shop or other facility located elsewhere is subject to CWHSSA overtime pay for all the hours worked at both locations and travel time between them. (Different wage rates might be paid, as the Davis-Bacon prevailing wage requirements would apply only to activities performed on “the site of the work”.)
Laborers, Mechanics, Working Foreman and Apprentices

- Laborers and mechanics include workers whose duties are manual or physical in nature (including workers who use tools or who are performing the work of a trade), as distinguished from mental or managerial duties.

- Working foremen devote more than 20 percent of their time during a workweek to mechanic or laborer duties (must be paid in classification of work performed).

- Apprentices are paid less than a journeyman, must have a certification, must not work alone and are subject to the ratio of laborers to mechanics.
Use of Apprentices

- Apprentices will be permitted to work at less than prevailing wage rate when employed and individually registered in a certified apprenticeship program registered with the Department of Labor (DOL).

- The allowable ratio of apprentices to journeymen in any craft classification shall not be greater than the ratio permitted to the contractor as to his/her entire work force under the registered program.

- An apprentices pay shall be not less than the specified rate in the registered program for the apprentice's level of progress expressed as a percentage of the journeymen's rate contained in the applicable WD and is determined on a daily, not weekly basis.
Sample Journeyman to Apprentice Ratios

Apprentice Wage Progression/Schedule:

50%- 1st year  (full benefits)
75%- 2nd year  (full benefits)
90%- 3rd year  (full benefits)

Journeymen to Apprentice Ratios:

One (1) journey worker to one (1) apprentice on a two (2) worker job.
One (1) apprentice to two (2) journey workers on a three (3) worker job*.
Two (2) apprentices to four (4) journey workers on a six (6) worker job.
Three (3) apprentices to nine (9) journey workers on a twelve (12) worker job.
Four (4) apprentices to twenty-five (25) journey workers.
Five (5) apprentices to thirty-five (35) journey workers.
Six (6) apprentices to fifty-five (55) journey workers
One (1) apprentice to every twenty (20) workers thereafter
Truck Drivers are covered by the DBA in the following circumstances:

- Drivers of a contractor/subcontractor for time spent working on the site of work.

- Drivers of a contractor/subcontractor for time spent loading and/or unloading materials and supplies on the site of the work, if such time is not de minimis (see FOHe22(b)(3)

- Truck Drivers transporting materials or supplies between a facility that is deemed part of the site of work and the actual construction site.

- Truck Drivers transporting portions of the building or work between a site established specifically for the performance of the contract or project where a significant portion of such building or work is constructed and the physical places(s) where the building or work called for in the contract will remain.
Truck drivers **are not covered** in the following instances:

- Material delivery truck drivers while off the site of work.

- Drivers of a contractor/subcontractor traveling between a DBA job and a commercial supply facility while they are off the site of work.

- Truck drivers whose time spent on the site of work is de minimis, such as only a few minutes at a time to pick up or drop off materials or supplies.
Payroll Administration and Necessary Forms

Employee Interviews
  • Form 10-O GAM

Contractor Certified Payroll
  • Form 10-L GAM

CGA/Grantee Payroll Review Worksheet
  • Form 10-M GAM

Deduction Authorization
  • Form 10-N GAM

Complaint Intake and Processing
  • Form 10-P GAM
Roles & Responsibilities

Prime & Subcontractors
- Must pay all laborers and mechanics weekly
- Must pay no less than prevailing wage rate (cash+fringe)
- Must submit weekly certified payrolls

Prime Contractor
- Complete responsibility for self, sub-contractors and any lower-tiered contractors
  - Sole Proprietors must complete a Certified Payroll Reports (CPR) and have it signed by the Prime Contractor
- Labor standards must be included in all contracts subject to Davis Bacon regulations

Certified Grant Administrator
- Point of contact for Program Specialist and Grantee
- Review all Certified Payroll Reports, contracts and related project documents
- Ensure that the Grantee maintains a complete project folder at its office
• Employers must ensure Contractors allow all laborers and mechanics to be interviewed

• HUD 11 is the Employee Interview Form. 10-O in the GAM

• CGA/Grantee must take necessary precautions to safeguard sensitive information that may be collected or generated for labor standards purposes

• Must be conducted in person
Certified Payroll Reports

• Payroll Form (WH-347) – Required

• Statement of Compliance (signature page) – signer must be the owner or have written authorization from the owner

• “Initial” and “Final” CPR must be marked as such

• Include “No Work” Payrolls (non-performance)

• Include Fringe Benefit Statement (if paying into a plan)

• Indicate Classification and Wage Rate

• Deductions – all “other” deductions must be authorized by the worker
Look for...

- Dates
- Payroll #
- Wage Rate
- Hours Worked
- Overtime
- Deductions
- Wages Paid
Certified Payroll – Page 2

Look for...

- Signer/Title
- Time Period
- Benefits
- How Fringe is Paid
- Exceptions
- Remarks
- Signer
CGA Payroll Review

- Payroll Review Worksheet is required for every Certified Payroll
- CGA should submit with Certified Payrolls to Program Specialist
- Form 10-L in the GAM
Fringe Benefits (FB)

- Under DBA, FB’s are a component of the “prevailing wage”

- The WD obligation may be satisfied by:
  - Paying the Basic Hourly Rate (BHR) and FB in cash
  - Contributing payments to a defined plan
  - Any combination of the two

- Every employee must be paid for all hours worked, including overtime

- FB do not include employer payments or contributions required by Federal, State or local laws, such as the employer’s contribution to Social Security or some disability insurance payments

- Examples of Fringe Benefits: Life Insurance, Health Insurance, Pension, Vacation, Holiday, Sick Leave, Training Fund contributions
PLUMBERS UNION LOCAL 690
WAGE AND FRINGE BENEFIT RATES
EFFECTIVE MAY 1, 2007 THROUGH APRIL 30, 2008
READING and LEHIGH VALLEY
BUILDING TRADES

MAY 1, 2007 contract increase of $2.55

<table>
<thead>
<tr>
<th>WAGES</th>
<th>04/30/2007</th>
<th>05/01/2007</th>
<th>INCREASE</th>
</tr>
</thead>
<tbody>
<tr>
<td>PENSION PLAN</td>
<td>$32.10</td>
<td>$32.83</td>
<td>$0.75</td>
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<tr>
<td>S.R.P.</td>
<td>$5.87</td>
<td>$6.62</td>
<td>$0.75</td>
</tr>
<tr>
<td>HEALTH PLAN</td>
<td>$2.04</td>
<td>$2.34</td>
<td>$0.30</td>
</tr>
<tr>
<td>APPRENTICE PLAN</td>
<td>$9.91</td>
<td>$10.66</td>
<td>$0.75</td>
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<tr>
<td>INDUSTRY FUND</td>
<td>$0.37</td>
<td>$0.37</td>
<td>$0.00</td>
</tr>
<tr>
<td>SCHOLARSHIP FUND</td>
<td>$0.24</td>
<td>$0.24</td>
<td>$0.00</td>
</tr>
<tr>
<td>TOTAL PACKAGE</td>
<td>$50.58</td>
<td>$53.13</td>
<td>$2.55</td>
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</tbody>
</table>

SUMMARY OF INCREASE:

<table>
<thead>
<tr>
<th></th>
<th>INCREASE</th>
</tr>
</thead>
<tbody>
<tr>
<td>WAGE</td>
<td>$0.75</td>
</tr>
<tr>
<td>PENSION PLAN</td>
<td>$0.75</td>
</tr>
<tr>
<td>S.R.P.</td>
<td>$0.30</td>
</tr>
<tr>
<td>HEALTH PLAN</td>
<td>$0.75</td>
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<tr>
<td>APPRENTICE PLAN</td>
<td>NO CHANGE</td>
</tr>
<tr>
<td>INDUSTRY FUND</td>
<td>NO CHANGE</td>
</tr>
<tr>
<td>SCHOLARSHIP FUND</td>
<td>NO CHANGE</td>
</tr>
</tbody>
</table>

Deduction from Hourly wages:
- Deduct $1.75 for Vacation Fund per hour paid from Net Wages
- Deduct $0.10 for Political Action and $0.07 cents for Social Fund per hour from Net Wages
- Deduct 2.52% of the Total Package (gross wages ($32.85) Fringe Benefits ($20.28) = Total Package $53.13
- Deduct $0.40 for Organizational Fund per hour paid from Net Wages for Journeymen
- Deduct $0.15 for Organizational Fund per hour paid from Net Wages for Apprentices

Foreman Hourly Wage Rates:
- Foreman (2-5 Journeymen) 107% of Journeymen Rate
- Foreman (2-10 Journeymen) 110% of Journeymen Rate
- Area Foreman 112% of Journeymen Rate
- General Foreman 115% of Journeymen Rate (supervising 2 or more Foremen & 100 Journeymen or less)
- General Foreman 120% of Journeymen Rate (supervising 2 or more Foremen & 101 Journeymen or more)
Fringe Benefit Example

Davis-Bacon wage determination requires:

- Basic hourly rate $10.00
- Fringe benefit 2.00

Total prevailing rate $12.00

1. $12.00 in cash wages or,
2. $10.00 plus $2.00 in pension contributions or other FB, or
3. $9.00 plus $3.00 in pension contributions or any combination of FB

Wages paid in excess BHR may be used as an offset or credit to satisfy FB
Overtime Example

Basic Wage = $10.00

Fringe Benefit = $2.00

Hours worked = 42

• Overtime is 1.5 x $10 x 2 hours = $30

• You would not pay 1.5 of the $2 for fringe benefits
Defined Fringe Benefit Plans

Contractors may take credit for defined FB fund contributions made to third-party trustees or insurers that:

- Are irrevocably paid; and,

- Are made regularly, not less often than quarterly

Credit is for payments made for individual workers eligible to participate in the plan, program, or fund.

A description of the approved plan must be submitted to the Program Specialist.

The Program Specialist may also request written approval from the employee to have the funds deducted.
Deductions

- Deductions are permissible for the following:
  - Loans
  - Garnishment
  - 401K, etc.

- Deductions are permissible only if there is signed authorization by the employee that includes the specific dollar amount, and it is received prior to the deduction from the employee’s pay check
  - Use Form 10-N in the GAM “Payroll Deduction Authorization Form”

PAYROLL DEDUCTION AUTHORIZATION FORM

AUTHORIZED TO MAKE OTHER DEDUCTIONS

I ____________________________, hereby authorize my employer, ____________________________, to make deductions not otherwise listed as permissible deductions on wages earned while employed on the following project.

PROJECT NUMBER: ____________________________
PROJECT NAME: ____________________________
PROJECT LOCATION: ____________________________

These deductions are voluntary and are authorized for the purpose of:

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Amount Per Week</th>
<th>PPE Deduction Period</th>
<th>Comments</th>
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</table>

Employee Signature ____________________________

Date ____________________________
Red Flags

- Discrepancies in wage computations
- Wages stated in the Employee Interview don’t match the certified payroll
- Extraordinary deductions

Steps to take:

- Request a list of employees working on a site from contractor that includes address and phone number when contract is signed
- Targeted on-site interviews
- Send questionnaires to affected workers (HUD-4730)
- Request additional documentation from contractor (e.g. cancelled checks)
Restitution of Wages

• CGA/Grantee must notify the Prime Contractor in writing of any underpayments

• Allow 30 days to correct underpayments

• Wage restitution is the difference between the wage rate paid and the wage rate required for all hours worked

• Employers must submit a corrected restitution payroll
Restitution Payroll Requirements

- Reflect the period of time for which restitution is due
- Lists employees to whom restitution is paid
- Lists the work classification(s)
- Lists total number of work hours involved
- Lists the adjusted wage rate
- Lists the gross amount of restitution due
- Lists deductions and the net amount paid
- Includes the signed Statement of Compliance by owner or designee
Reports

Required by the Statute 29CFR 5.7 “Reports to the Secretary”

Types of reports:

• 5.7 enforcement report

• Semi-annual Labor Enforcement Reports
5.7 Enforcement Report

• Required if restitution collected is over $1000 per subcontractor

• Required on all willful violations

• Can be used as a tool
Semi-Annual Enforcement Report

• Collected twice a year from each Grantee subject to DBRA in March and September

• This report is a Congressional report

• Information is collected continuously

• Looks at new Prime contracts entered into and restitution paid within the 6 month period
Recommended Resources for CGAs

- GAM Chapter 10, Construction Management and Labor Standards
- DBRA Packet, Form 4-R in GAM
- Contractor’s Guide to Davis Bacon Requirements
- HUD Handbook 1344.1 REV 2
- 29 Code of Federal Regulation Part 5
- DOL Field Operations Handbook
- Practical Guide for States, Tribes, Local Agencies
Contact Information

Gregory C. West, EDFP
CDBG Program Manager
Michigan Economic Development Corporation
300 N. Washington Square, Lansing, MI 48913
Email: westg2@michigan.org
Questions?

Type questions into instant messenger on skype or email clappm1@michigan.org

- 5 Minute Break -
Chapter 8 Financial Management
Session Agenda

Financial Management

- Costs Principles
- Accounting and Records
- Audit Requirements
Financial Management
Financial Management – Cost Principles

2 CFR Part 200
Subpart E – Cost Principles

**Basic Considerations**
200.403 Allowability of costs
200.404 Reasonable costs
200.405 Allocable costs

The application of these cost principles is based on the fundamental premises that:

The non-Federal entity is responsible for the efficient and effective administration of the Federal award through the application of **sound management practices**.
Financial Management – Allowable Costs

§ 200.403 Factors affecting Allowability of costs

In order to be allowable under Federal awards:

• Be necessary and reasonable for the performance of the Federal award.
• Conform to any limitations or exclusions set out in the grant award, concerning type of cost or amount.
• Be determined in accordance with generally accepted accounting principles (GAAP)
• Be adequately documented

Allowability Checks:

To determine if costs are allowable:

• Scope of Grant
• During Grant Term
• Matching Requirements Met
• Debarment Checks Done
• Contracts in Place
• Adequately Documented
Financial Management – Reasonable Costs

§ 200.404 Reasonable costs:
A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

*Reasonable costs must give consideration to:*

- Whether the costs are *ordinary* and *necessary*.

- Sound business practices, Federal, State, Local and other Law and regulations.

- The terms and conditions of the Federal award.

- Market prices for comparable goods or services for the geographic area.
Financial Management – Allocable Costs

§ 200.405 Allocable costs
A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received.

This standard is met if the cost:

• Is incurred specifically for the Federal award.

• Follows direct cost allocation principles.

• Allocable to a Specific Budget Line.
Accounting & Records – Reimbursement Requests

CDBG Expenses

- Reimbursement Based Program
- Timely submission of Documentation:
  - Ensures adequate cash flow
  - Contractors get paid
  - Reduces risk of incurring ineligible costs

Reimbursement Requests

- Payment Requests must be made at least Quarterly
- Unless directed otherwise:
  - By determination in Risk Assessment
  - Outlined in Grant Agreement
  - Requested by Program Specialist/Manager/Director
Reimbursement Requests – Reimbursement Timing

Reimbursement Timing:
The standard turnaround from submission of complete and accurate payment request, to the UGLG’s receipt of funds is 3 weeks.

Ways to speed up the process:
• Submit payment requests with all signatures, forms, and documentation
• Grantee has updated Payment Information in SIGMA (must be EFT)
• Respond to questions from Program Specialist quickly.
Reimbursement Requests – Required Documentation

Documentation verifies Cost Principles have been met:

• Cost Reasonableness is assured with clear pricing.
• Costs are Allowable with invoices directly ties to Project Objectives.
• Costs are made Allocable by assigning cost to Budget line items.

People Who Get Paid

- Proper Documentation: 100%
- No Documentation: 0%

SLIDE: 60

MICHIGAN ECONOMIC DEVELOPMENT CORPORATION
Reimbursement Requests – Required Documentation

Proper Documentation includes:

- **Itemization** – Invoices should contain a reasonable level of detail.
- **Eligible Date** (date range) – Must be within grant term.
  - *Unless previously authorized in writing.*
- **Signatures** – of Authorized Signers set out in Pre-Agreement discussions.
# Required Documentation – Form 8-A1: Payment Request Form

1. **Project Title:**

2. **Grant No.:**

3. **Name and Address of Grantee:**

4. **Federal ID No.:**

5. **Request No.:**

6. **Grant Term:**
   - From: 
   - To: 

7. **Final Request:**
   - Yes
   - No

8. **Dates Expenditures Incurred** (do not cross state fiscal years 9/30):
   - From: 
   - To: 

9. **Total Amount Requested:**

10. **Use 1 Column for each Project Activity**
    - (from Attachment A: Project Budget; i.e., Construction, address of façade, etc.)*
    - a. Approved Grant Budget (CDBG Funds Only)
    - b. Total CDBG Funds Previously Requested
    - c. Max CDBG Funds Available for this Request
    - d. Request for Reimbursement
    - e. Request for Advance
    - f. Balance of funds available after this request

11. **Match**
    - Local Match
    - Private Match
    - Other Match
    - MATCH TOTAL

12. **Grantee Comments:**

**Certification:**
- [ ] I certify by initialing all that are applicable below (enter n/a if not applicable)

- a. Wages have been paid in accordance with the Federal Labor Standards (Davis Bacon).
- b. Requested funds are for activities within the scope of the approved Environmental Review, Grant Agreement and/or RLF Agreement. Funds requested were incurred after the environmental release of funds if applicable.
- c. Documentation is attached reflecting CDBG eligible expenditures and all required match funds reported on this payment request. These expenditures are based on the CDBG percentage of project costs from the Grant Agreement. Loan projects attach documentation showing costs meet program requirements and are within budget.
- d. All previously requested CDBG funds have been expended.
- e. For first payments, the items required on the Pre-Dissbursement Requirements form have been submitted.

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 21, Sections 3729-3720 and 3801-3812).

**Signature:**

**Typed/Printed Name & Title:**

**State Agency Approval & Date:**

---

*See the ‘Payment Request Instructions’ or ‘Payment Request Instructions Loan’ tab for directions
### Required Documentation – Form 8-A2: Invoice Detail List

<table>
<thead>
<tr>
<th>CDBG Payment Request Invoice Summary</th>
<th>Grantee Name:</th>
<th>Grant Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Invoice #: Vendor Name</td>
<td>Invoice Date</td>
<td>Total Invoice Amount</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>57839 Bob Smith, CGA</td>
<td>1/5/2016</td>
<td>$ 40,000.00</td>
</tr>
<tr>
<td>2015007 ABC Contracting</td>
<td>12/27/2015</td>
<td>$ 120,000.00</td>
</tr>
</tbody>
</table>

**Previously Reported project Expenditures (grant to date summary; amounts from prior disbursement request)**

**Current Request - List each invoice**

<table>
<thead>
<tr>
<th>Invoice #: Vendor Name</th>
<th>Invoice Date</th>
<th>Total Invoice Amount</th>
<th>Amount to be Reimbursed from CDBG**</th>
<th>Amount Reimbursed from Local Match</th>
<th>Amount Reimbursed from Private Match</th>
<th>Amount Reimbursed from Other Match</th>
<th>Amounts to Exclude</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Subtotal (Current Request)**

- $ - $ - $ - $ - $ - |

**Grand Total (Prior and Current Request)**

- $ - $ - $ - $ - $ - |

**Directions:** Please fill in the above information. In the "Previously Reported" section please enter the amounts reported prior to this request by category. In the "Current Request" section please list all invoices included in this Disbursement Request. Please note that invoices that are paid for from matching funds MUST be included as well as those with CDBG reimbursable amounts. In the invoice column if there is not invoice number feel free to enter another identifier. The Amount in the yellow box should match the amount you are requesting on the Disbursement Request.
Reimbursement Requests – Required Documentation

Used by Admin Requestors:

- Certified Grant Administrator
- Municipal Officer
- General Contractor
- Lead Engineer

- Single Day (no date ranges)
- All expenses must be itemized.
Accounts Payable

Payables must be established at Fiscal Year End for CDBG expenses not reimbursed.

- Payment Requests can NOT cross the MEDC’s fiscal year (10/1 – 9/30).
- MEDC’s fiscal year end is September 30th.
- Detailed directions will come out August/early September.
- Complete and return the form; even if no payable is needed.
Audit Requirements – Single Audit

What is a Single Audit?

- Required for government entities and nonprofits.
- UGLG that expends more than $750,000 in Federal dollars require a “Single Audit”.
- The goal is to provide assurance to the Federal Government the proper management of funds.

The Audit should determine:

- Financial information is presented in accordance with established or stated criteria.
- The entity has adhered to specific financial compliance requirements.
- The entity’s internal control structure over financial reporting and/or safeguarding assets is suitably designed and implemented to achieve control objectives.
Audit Requirements – Certification

Form 8-C Audit Requirement Certification

• Certification informs CDBG Staff if Single Audit is Required.

• Submitted through MEDC Portal.

• Due 60 Days after UGLG Fiscal Year End.

• Grant Closes after Final Audit Review is completed.
Contact Information

Jonathon Lukco
CD Financial Analyst
Michigan Economic Development Corporation
300 N. Washington Square, Lansing, MI 48913
Lukco1@michigan.org
Questions?

Type questions into instant messenger on skype or email clappm1@michigan.org
Chapter 12 Monitoring
Monitoring

CDBG is required by statute to monitor its recipients.

**Title I** of the Housing and Community Development Act of 1974, as amended

**24 CFR Part 570.492** of the State CDBG Regulations
Monitoring

Ensure three key areas are in compliance:

1. Approved activities are carried out in a **timely manner**.

2. Activities and certifications are conducted in accordance with the **requirements of Title I** and with **other applicable laws**.

3. Recipients show a **continuing capacity** to carry out approved activities in a timely manner.
Monitoring

**Program areas** to be reviewed during monitoring include:
1. National Objectives
2. Environmental Review
3. Financial Management (incl Program Income)
4. Citizen Participation
5. Procurement and Contracting
6. Construction Management and Labor Standards
7. Section 3
8. Fair Housing and Equal Opportunity
9. Acquisition
10. Relocation
11. Program Requirements – Rental
12. Certified Grant Administrator
Monitoring

- **Findings of Deficiency** are program elements which do not comply with a Federal statute, regulation, or other applicable laws, guidelines and program policies.

- **Areas of Concern** are potential findings or program weaknesses that should be improved upon to avoid future problems.
Monitoring

- Monitoring will be held at a **date/time and location** as determined by Program Specialist, UGLG and CGA and will take approximately 3-4 hours.

- A **financial representative** from your community must be available to meet with during the monitoring. This section will take approximately 1 - 1 ½ hours.

- A **tour of the project site(s)** will also be requested. Before, during and after photos are recommended.
Monitoring

- It is highly recommended for UGLG and CGA to complete the Monitoring Checklist (12-A) prior to monitoring.

- The grant file and all documents must be available for review. Including documents from contracted parties (i.e., architects, engineers, administrators)

- Hard copies of certain documents must be copied and presented to Program Specialist at monitoring. They are listed in monitoring email and Monitoring Checklist (COPY TO MEDC).
## Monitoring

<table>
<thead>
<tr>
<th>GAM Form #</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>8-B1</td>
<td>Personal Property Management Report</td>
</tr>
<tr>
<td>8-B2</td>
<td>Real Property Management Report</td>
</tr>
<tr>
<td>UGLG</td>
<td>Journals/general ledger showing receipt/expenditure of grant funds.</td>
</tr>
<tr>
<td>UGLG</td>
<td>System for tracking Program Income</td>
</tr>
<tr>
<td>11-B</td>
<td>Disclosure and Update Report, HUD-2880</td>
</tr>
<tr>
<td>11-C</td>
<td>Disclosure of Lobbying Activities</td>
</tr>
<tr>
<td>4-A</td>
<td>Procurement Policy</td>
</tr>
<tr>
<td>4-S</td>
<td>DBRA Posters (four) were posted on job site</td>
</tr>
<tr>
<td>10-P</td>
<td>Federal Labor Standards Complaint Intake Form, HUD-4731</td>
</tr>
<tr>
<td>9-B</td>
<td>Section 3 Policy Plan</td>
</tr>
<tr>
<td>9-A1</td>
<td>Section 3 Business Concern Certification</td>
</tr>
<tr>
<td>9-A</td>
<td>Section 3 Resident Eligibility Certification</td>
</tr>
<tr>
<td>UGLG</td>
<td>Community Profile</td>
</tr>
<tr>
<td>9-D</td>
<td>Contract Solicitation and Section 3 Reporting Record</td>
</tr>
<tr>
<td>9-E</td>
<td>Fair Housing Ordinance or Fair Housing Resolution</td>
</tr>
<tr>
<td>UGLG</td>
<td>Fair Housing Policy</td>
</tr>
<tr>
<td>9-G</td>
<td>Section 504 Self-Evaluation</td>
</tr>
<tr>
<td>9-I</td>
<td>Grievance Procedure</td>
</tr>
<tr>
<td>9-J</td>
<td>Non-Discrimination on Basis of Handicap</td>
</tr>
<tr>
<td>9-K</td>
<td>Excessive Force Policy</td>
</tr>
</tbody>
</table>

**Note:** Some entries marked with `UGLG` indicate documents related to fair housing policies and regulations.
Monitoring

- The Program Specialist will work with UGLG on-site to correct deficiencies, if possible.

- Items which cannot be addressed will be included in the monitoring letter.

- **Exit conference** to discuss areas of concern.
Monitoring and Grant Amendments

- Program Specialist will email a **Monitoring letter** identifying Findings or Concerns and corrective actions.

- A **written response and attachments** is required from UGLG within **30 days** of monitoring letter.

- Failure to respond within 30 days will be considered non-compliance and may result in a **hold on payments** until a suitable response is received by the MEDC.

- Upon receipt of written response and required attachments, Program Specialist will review and, if acceptable, provide a **Findings Resolved letter** to the UGLG.
Contact Information

Questions on GAM Chapter 12 – email Shawne Haddad at haddads2@michigan.org

Grant-specific Questions – email your Program Specialist.
Questions?

Type questions into instant messenger on skype
or email clappm1@michigan.org
Reporting Requirements
Reporting Requirements

The UGLG must complete the following reports throughout the term of the grant:

- Progress Report, 1-A (per Grant Agreement)
- Job Creation Summary Report, 2-C
- Contract and Subcontract Activity Report, HUD-2516, 4-P
- Semi-Annual Labor Standards Enforcement Report, HUD-4710, 10-S
- Section 3 Summary Report, HUD-60002, 9-C
Reporting Requirements

PROGRESS REPORT, 1-A

Status of activities on a cumulative basis.

Report Periods are set forth in Grant Agreement
1/1 – 6/30, due 7/15
7/1 – 12/31, due 1/15
# Reporting Requirements

## PROGRESS REPORT, 1-A

INSTRUCTIONS: Grantees under the Michigan CDBG Program are required to prepare a program progress report every six months. The program progress report must be completed and submitted to the Michigan Economic Development Corporation (MEDC) within fifteen (15) days after the end of each six-month period. The information provided should be cumulative from the beginning date of the term of work performance. Failure to submit a complete program progress report may jeopardize further disbursement of grant payments by the State and could result in a negative determination of the grantee’s capacity for administering grant funds.

**PROGRESS REPORT PERIOD:**

<table>
<thead>
<tr>
<th>A. IDENTIFICATION</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Grantee:</td>
<td>Grant Number:</td>
</tr>
<tr>
<td>Mailing Address:</td>
<td>Grant Amount:</td>
</tr>
<tr>
<td>Email Address:</td>
<td></td>
</tr>
<tr>
<td>Project Title:</td>
<td></td>
</tr>
</tbody>
</table>

**Term of Work Performance**

<table>
<thead>
<tr>
<th>From:</th>
<th>To:</th>
<th>Final Report</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B. CERTIFICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>I certify that to the best of my knowledge and belief this report is correct, complete, and accurately presents the current status of the approved CDBG project.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>Signature:</th>
</tr>
</thead>
<tbody>
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<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Telephone Number:</th>
<th>Name and Title:</th>
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</thead>
<tbody>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>C. SYSTEM FOR AWARD MANAGEMENT (SAM) / CASE CODE #</th>
</tr>
</thead>
<tbody>
<tr>
<td>I certify that to the best of my knowledge and belief the LiSGLA registration in the System for Award Management (SAM) under SAM/Cage Code# ____________________________ is still current.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date:</th>
<th>Signature:</th>
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<tbody>
<tr>
<td></td>
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</tbody>
</table>
# Reporting Requirements

## PROGRESS REPORT, 1-A

| Activities (CDBG Funded) |完成了（是或否）| 实际/预期完成日期 | 备注：进度、问题、延迟等。
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>环境审查</td>
<td></td>
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</tr>
<tr>
<td>建筑规划工程</td>
<td></td>
<td></td>
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<tr>
<td>招标开标</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>合同授予</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>建筑施工</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>财产收购/搬迁</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>所有CDBG资金支出</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG采购政策</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG非住宅反歧视和搬迁计划</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG第3条政策</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG公平住房政策，UGLG投诉程序在第504条</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG在基础上的非歧视政策</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG过度暴力政策</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>UGLG公共参与计划</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **CDBG Grant Amount**: $ unspecified
- **Total CDBG Payments Received**: $ unspecified
- **Total Local Funds Expended**: $ unspecified
- **Total CDBG Funds Expended**: $ unspecified
- **Total Private Funds Expended**: $ unspecified
- **Percent of Project Complete**: % unspecified
- **Total Other Funds Expended**: $ unspecified
- **Is the CDBG portion on schedule?**: Yes or No
- **Is the Private portion on schedule?**: Yes or No or N/A

---

**MICHIGAN ECONOMIC DEVELOPMENT CORPORATION**

Slide: 86
Reporting Requirements

JOB CREATION SUMMARY REPORT, 2-C

Required for all *job creation* projects to document at least 51% of new hires are low/mod income.

New hires will complete the Income Certification form and self-certify household family income.

CGAs will submit Job Creation report based on Income Certification forms

**Report Periods**
1/1 – 6/30, due 7/15
7/1 – 12/31, due 1/15
Reporting Requirements

CONTRACT AND SUBCONTRACT ACTIVITY, HUD-2516, 4-P

Required for all construction activities with contractors and subcontractors.

Report Period
10/1 – 9/30, due 10/10
Reporting Requirements

**CONTRACT AND SUBCONTRACT ACTIVITY, HUD-2516, 4-P**

**Contract and Subcontract Activity**

U.S. Department of Housing and Urban Development

Executive Order 12821 dated July 14, 1993, directs the Minority Business Development Agencies (MBDA) to develop and maintain a database of minority-owned businesses. This information is used by HUD to monitor and assess the minority-owned business enterprise (MBE) goals. The Department requires the information to provide guidance and oversight for programs that develop minority business enterprises and help establish minority business development. If the information is not accurate, HUD would not be able to establish meaningful MBE goals and verify MBE performance against those goals.

**Privacy Act Notice** The U.S. Department of Housing and Urban Development, Federal Housing Administration, is authorized to collect the information requested in this form by virtue of Title 12, United States Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. It will not be disclosed or released outside the United States Department of Housing and Urban Development without your consent, except as required or permitted by law.

**Contract and Subcontract Activity**

<table>
<thead>
<tr>
<th>Contract and Subcontract Activity</th>
<th>U.S. Department of Housing and Urban Development</th>
</tr>
</thead>
</table>

**Table:**

<table>
<thead>
<tr>
<th>Contract Information</th>
<th>Subcontract Information</th>
</tr>
</thead>
</table>

**Additional Information:**

<table>
<thead>
<tr>
<th>Type of Trade Code</th>
<th>Description</th>
</tr>
</thead>
</table>

[Image of form]

**Contact Information:**

**Michigan Economic Development Corporation**

---

**Slide:** 89
Reporting Requirements

SEMI-ANNUAL LABOR STANDARDS ENFORCEMENT REPORT, HUD-4710, 10-S

Required for new Prime contracts entered into within the 6-month period.

Required for restitution due for any employee (prime or sub)

Report Periods
9/1 - 2/28, due 4/10
3/1 - 8/31, due 10/10
Reporting Requirements

SECTION 3 SUMMARY REPORT, HUD-60002, 9-C

Section 3 reporting and performance requirements applies:
• if the CDBG award amount is more than $200,000,
• to all contractors and subcontractors receiving more than $100,000 if the $200,000 threshold is met.

Report Periods
7/1 – 6/30, due 7/31
Reporting Requirements

SECTION 3 COMPLIANCE CERTIFICATION
Reporting period: July 1, ___________ to June 30, ___________

Grantee: _____________________________                    Grant Number: _________________

Are you a grantee who has:

1. Received a CDBG grant award over $200,000.00?

and

2. Entered into any grant related contract
   a. totaling over $100,000.00,
   b. utilizing CDBG funds for a portion or the full amount of the contract and
   c. is initiated within the above-stated reporting period?

YES         NO

If yes to all, you are required to fill out the
Section 3 Summary Report – Form 9-C,
(HUD 60002).

((Printed name and title of Chief Elected Official) (Date)

If no, sign, date, and return this form to your program specialist.

MICHIGAN ECONOMIC DEVELOPMENT CORPORATION

Slide: 92
### Section 3 Summary Report

Economic Opportunities for Low- and Very Low-Income Persons

#### General Information

<table>
<thead>
<tr>
<th>Section 3 Summary Report</th>
<th>Economic Opportunities for Low- and Very Low-Income Persons</th>
<th>U.S. Department of Housing and Urban Development Office of Fair Housing And Equal Opportunity</th>
</tr>
</thead>
<tbody>
<tr>
<td>HUD Field Office:</td>
<td></td>
<td>OMB Approval No: 2529-0043 (exp. 11/30/2010)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1. Recipient Name &amp; Address: (street, city, state, zip)</th>
<th>Grant #</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>UGLG Info</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Federal Identification: (grant no.)</th>
<th>3. Total Amount of Award:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>4. Contact Person</th>
<th>5. Phone: (Include area code)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>6. Length of Grant:</th>
<th>7. Reporting Period:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>8. Date Report Submitted:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>9. Program Code: (Use separate sheet for each program code)</th>
<th>10. Program Name:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th><strong>Enter Term of Work</strong></th>
</tr>
</thead>
</table>

June 1, 2020 - July 1, 2020

CDBG
### Reporting Requirements

**SECTION 3 SUMMARY REPORT, HUD-60002, 9-C**

**Employment & Contracting Info**

<table>
<thead>
<tr>
<th>Part I: Employment and Training (<strong>Columns B, C and F are mandatory fields. Include New Hires in E &amp; F</strong>)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A</strong></td>
</tr>
<tr>
<td>Job Category</td>
</tr>
<tr>
<td>Professionals</td>
</tr>
<tr>
<td>Technicians</td>
</tr>
<tr>
<td>Office/Clerical</td>
</tr>
<tr>
<td>Construction by Trade (List)</td>
</tr>
<tr>
<td>Trade</td>
</tr>
<tr>
<td>Trade</td>
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<tr>
<td>Trade</td>
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<tr>
<td>Trade</td>
</tr>
<tr>
<td>Trade</td>
</tr>
<tr>
<td>Other (List)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>
Reporting Requirements

SECTION 3 SUMMARY REPORT, HUD-60002, 9-C

**Construction Contracts**

| A. Total dollar amount of all contracts awarded on the project | $ |
| B. Total dollar amount of contracts awarded to Section 3 businesses | $ |
| C. Percentage of the total dollar amount that was awarded to Section 3 businesses | % |
| D. Total number of Section 3 businesses receiving contracts | |

**Non-Construction Contracts**

| A. Total dollar amount all non-construction contracts awarded on the project/activity | $ |
| B. Total dollar amount of non-construction contracts awarded to Section 3 businesses | $ |
| C. Percentage of the total dollar amount that was awarded to Section 3 businesses | % |
| D. Total number of Section 3 businesses receiving non-construction contracts | |
SECTION 3 SUMMARY REPORT, HUD-60002, 9-C

Summary

Part III: Summary

Indicate the efforts made to direct the employment and other economic opportunities generated by HUD financial assistance for housing and community development programs, to the greatest extent feasible, toward low-and very low-income persons, particularly those who are recipients of government assistance for housing. (Check all that apply.)

_____ Attempted to recruit low-income residents through: local advertising media, signs prominently displayed at the project site, contracts with the community organizations and public or private agencies operating within the metropolitan area (or nonmetropolitan county) in which the Section 3 covered program or project is located, or similar methods.

_____ Participated in a HUD program or other program which promotes the training or employment of Section 3 residents.

_____ Participated in a HUD program or other program which promotes the award of contracts to business concerns which meet the definition of Section 3 business concerns.

_____ Coordinated with Youthbuild Programs administered in the metropolitan area in which the Section 3 covered project is located.

_____ Other, describe below.
Reporting Requirements

AUDITS
Audit Requirements Certification, 8-C (60 days of FYE)
Single Audit (9 months of FYE)

FINAL REPORTS
Job Creation Summary Report, 2-C
Payment Request, 8-A (60 days of TOW)
Progress Report, 1-A (120 days of TOW)
Closeout Documents (120 days of TOW)
Contact Information

Lenore Costa
CDBG Program Specialist
Michigan Economic Development Corporation
300 N. Washington Square, Lansing, MI 48913
costal@michigan.org
Questions?

Type questions into instant messenger on skype, time permitting. If you have additional questions post-training, you may submit questions to clappm1@michigan.org.

- End of June 17 Presentation -