



FY2022 CDBG Applicant's Workshop

January 11th-12th, 2022



Housekeeping



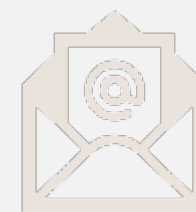
All participants will be in listen only mode during the presentations.



A copy of the presentation slides have been added to the Handouts Section.



During the Questions and Answer period, participants may enter questions using the chat feature. Questions will be moderated.



Questions and comments may also be emailed to cdbg.biz@dca.ga.gov for response after the workshop.

Day One Agenda

Federal and State Requirements

9:00 AM	Welcome
9:05 AM	Community Development Block Grant Program Overview Changes to the Method of Distribution
9:30 AM	Local Government Requirements
9:45 AM	Procurement, Citizens Participation Requirements
10:15 AM	Break
10:30 AM	Environmental Review Requirements
11:00 AM	Uniform Relocation Act
11:30 AM	Lunch
12:30 PM	Historic Preservation Division / Section 106 Requirements
1:00 PM	Comprehensive Plan and Service Delivery Strategy Requirements
1:30 PM	State Survey Requirements
2:00 PM	Local Government Audit Requirements
2:30 PM	Day 1 Wrap-up

**All times are approximate*

CDBG Overview and Changes to the Method of Distribution

Tommy Lowmon

Director, Office of Community Development



Previous experience with CDBG?

Poll Question 1



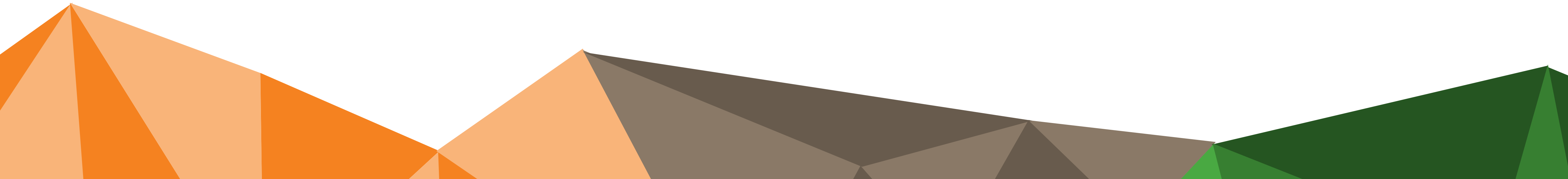
Who do you represent?

Poll Question 2



Goals of the Program

- Address State and community priorities
- Ensure fairness in the treatment of all applications
- Promote development of affordable housing
- Assist communities in preserving and developing basic infrastructure and public facilities
- Support economic development activities that principally benefit low- and moderate- income persons through job training and job creation



CDBG Programs and Allocations

The Georgia CDBG Program is comprised of the following:

Program	Allocation
Immediate Threat and Danger Program Set-Aside	\$500,000
Employment Incentive Program Set-Aside	\$4,000,000
Redevelopment Fund Program Set-Aside	\$1,500,000
Innovative Grant Program Set-Aside	\$4,000,000
Loan Guarantee Program (Section 108)	<i>Pledge not to exceed \$5,000,000</i>
Annual Competition <i>FFY21 allocation was approximately \$42million FFY22 allocation not yet released</i>	 <i>Balance of HUD allocation after administration, technical assistance and set-asides</i>

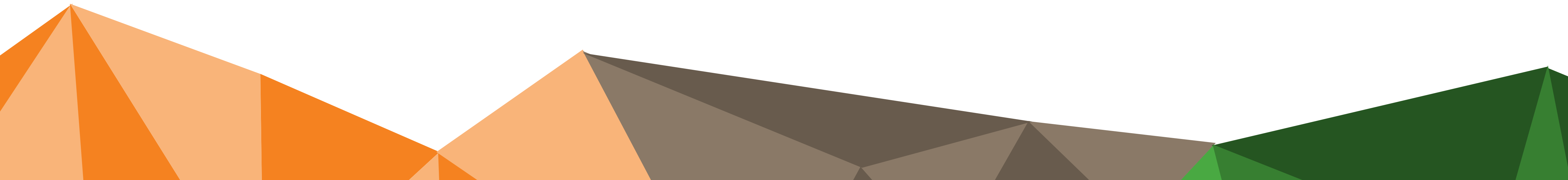
Eligible Applicants

- **Non-entitlement communities**

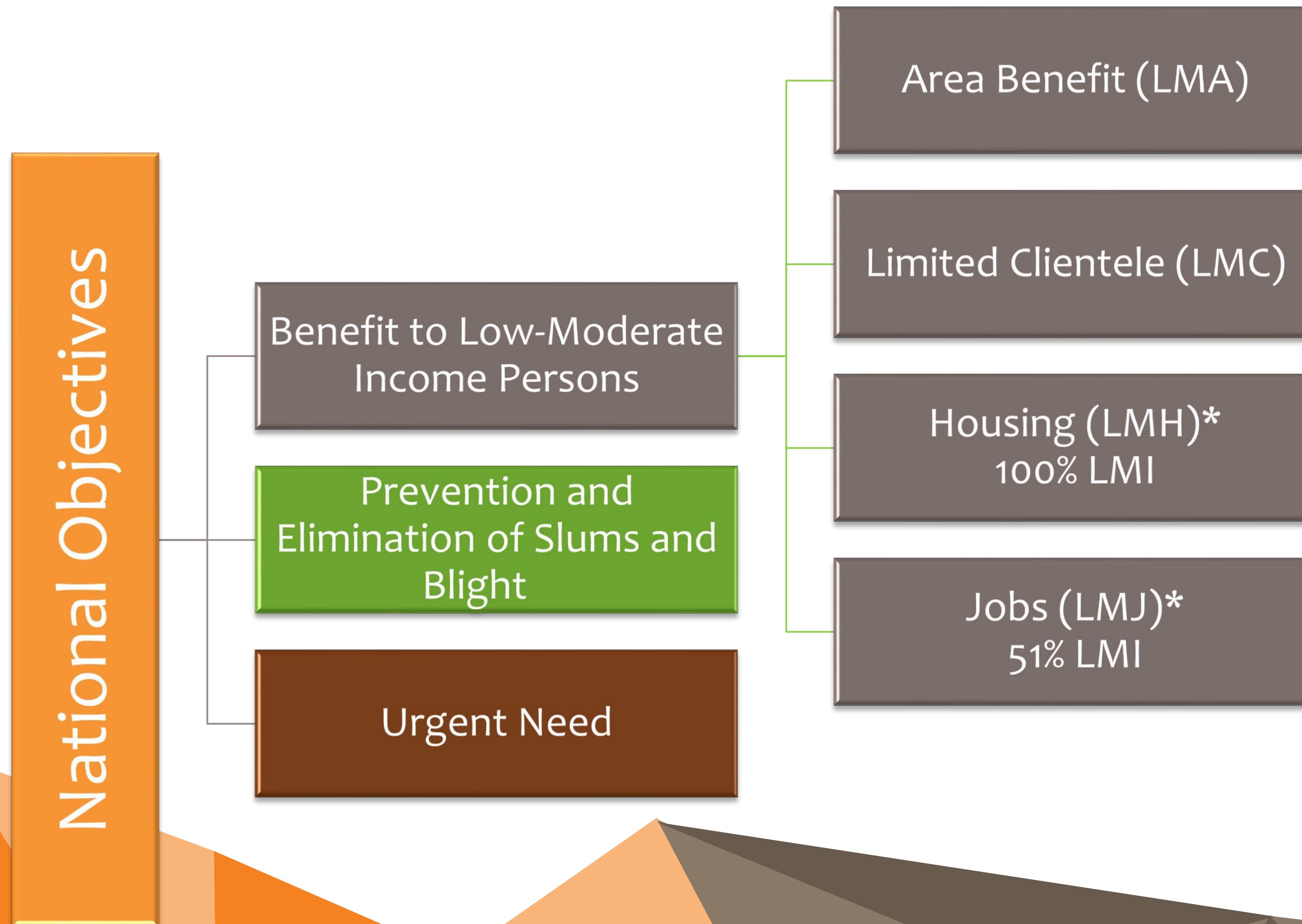
Cities/Counties that do not participate in the Entitlement Program

- The following entitlement communities are not eligible to participate in the State CDBG Program:

- The Cities of Albany, Atlanta, Brunswick, Dalton, Gainesville, Hinesville, Marietta, Rome, Roswell, Sandy Springs City, Savannah, Smyrna City, South Fulton, Valdosta, and Warner Robins.
- The Counties of Cherokee County, Clayton County, Cobb County, DeKalb County, Fulton County, Gwinnett County, and Henry County.
- The Consolidated Governments of Athens/Clarke County, Augusta/Richmond County, Columbus Consolidated Government, and Macon/Bibb County.
- Any incorporated city within a HUD Entitlement Urban County that has chosen to participate with the Urban County through a Cooperating Agreement.



National Objectives Requirements



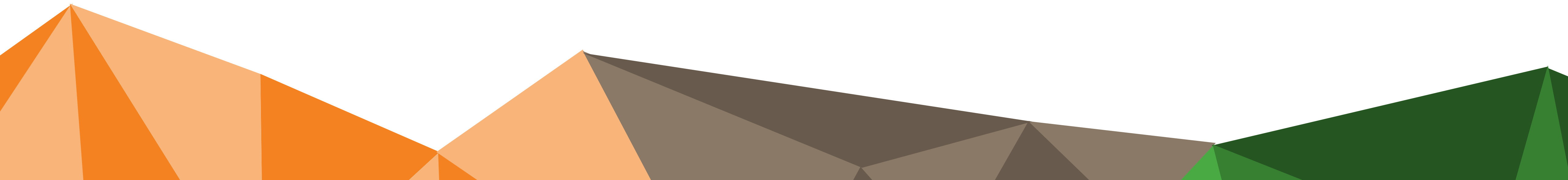
Eligible Projects

- For any activity(ies) carried out by a grantee to be considered eligible, two conditions must be met:

1. The activity(ies) must meet a National Objective

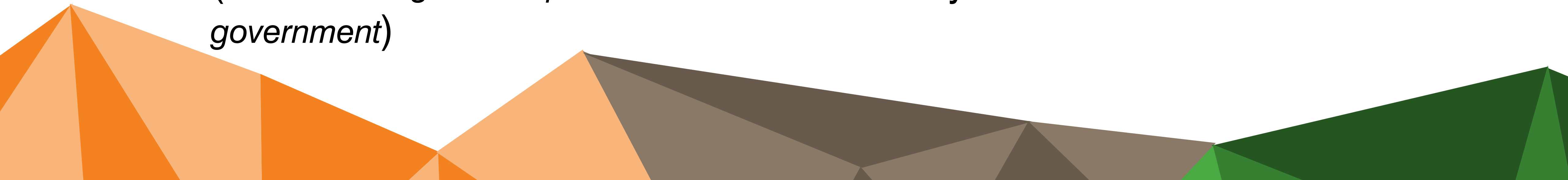
AND

2. The activity(ies) must be listed in the law as eligible.
Section 105(a) of the Housing and Community Development Act of 1974 (HCDA)




What's an Eligible Project?

- All projects must conform to eligible activities listed under Section 105(a) of the HCDA of 1974.
- Examples include, but may not be limited to:
 - Water and Sewer
 - Storm drainage
 - Street improvements
 - Housing clearance
 - Publicly owned buildings
(not used for general operation of government)
 - Housing rehabilitation or reconstruction
 - Fire protection
 - Senior Centers
 - Health Centers
 - Boys & Girls Clubs



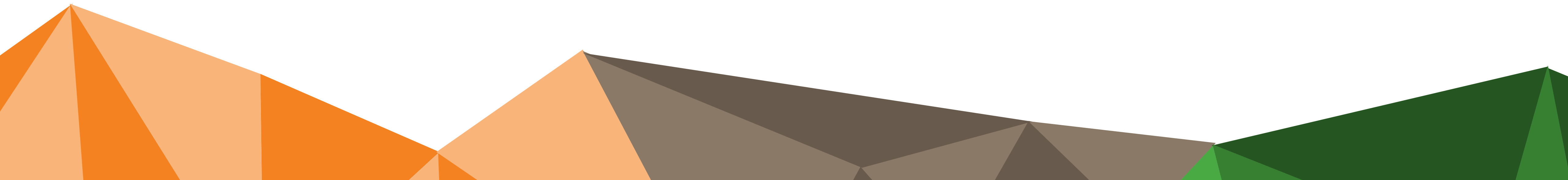
CDBG Ineligible Activities

Ineligible Activities	
Buildings for the Conduct of Government (except removal of architectural barriers)	
Direct grant assistance to a for-profit business	
General Governmental Expenses	
Operating & Maintenance Expenses	
New Housing Construction (not reconstruction)	
Lobbying Efforts	
Furnishings and Personal Property	
Operating and Maintenance Expenses	
Land Acquisition that is not directly tied to a national objective	

Threshold Requirements – Annual Competition

For the 2022 Annual Competition, threshold requirements include the following standards:

- 1) Submission of a complete application via the online portal;
- 2) Compliance with all deadline requirements as noted in the manual (pages 13-14);
- 3) Meeting all requirements as specified by DCA for curing any application deficiencies;
- 4) Completion all professional procurement requirements (any sole source requests must be submitted to DCA prior to June 3rd, 2022); and
- 5) Completion of the Tribal Consultation portion of the Environmental Review not later than June 3rd, 2022.



Funding Limits and Match Requirements for Annual Competition

Applicants may apply for:

- Single-Activity Project - up to \$1,000,000
- Multi-Activity Project - up to \$1,250,000
- Regional Cooperation Project – up to \$2,000,000

Local Match Requirements:

- 0% match requirement for grant requests of \$300,000 and less
- 5% match requirement for grant requests of \$300,001 to \$750,000
- 10% match requirement for grant requests of \$750,001 to \$1,000,000
- 15% match requirement for grant requests of \$1,000,001 or more

Changes in the Method of Distribution

Scoring –

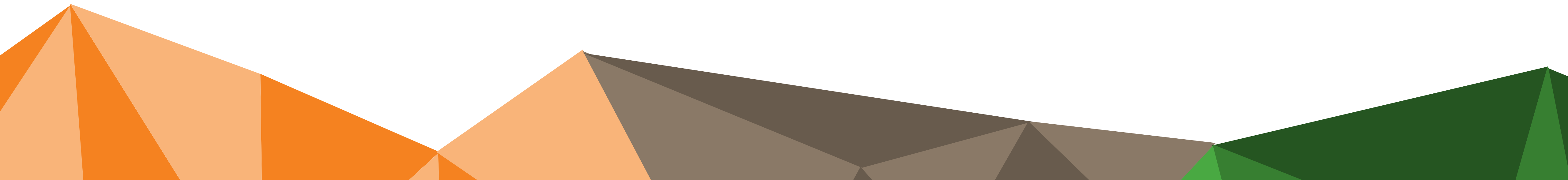
- Increase Project Need from 100 to 125
- Reduce Project Feasibility and Project Strategy from 100 points each to 50 points each;
- Project Impact has been reduced from 100 points to 75 points and incorporates a quantitative analysis as the basis for this scoring component. Project Impact is a component of Demographics and Cost per Person

Changes in the Method of Distribution

- The Leverage for Additional Resources scoring component was reduced from 25 points to 20 points and the Bonus Points for Regional Cooperation were reduced from 30 points to 20 points.
- A maximum of ten (10) bonus points may be earned for projects displaying a robust citizens participation process.

Robust Citizens Participation

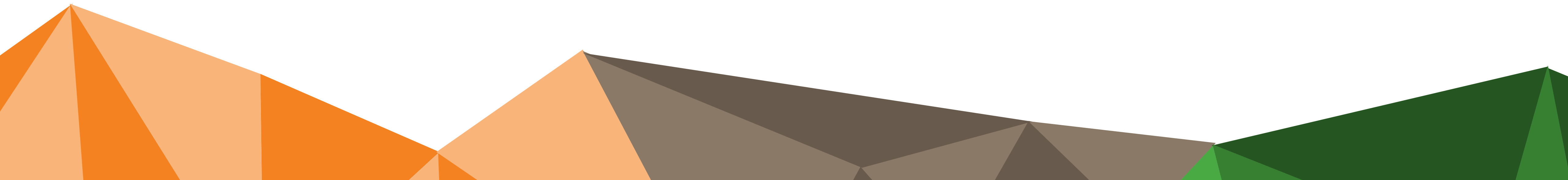
- Some examples include, but not limited to
 - Water bill announcements
 - Meeting times and frequency
 - Flyers- when, where, how often
 - Informative/ interactive webinars
 - DAD vs POP- approach to public engagement
- Extra efforts to provide an opportunity for citizens, especially LMI citizens, to participate in an advisory role in the planning, implementation, and assessment of the programs and projects funded through CDBG activities



Water Sewer Rate Increase

This year, DCA will use the standard that water charges of 1% or greater of median household income and sewer charges of 1% or greater of median household income, begin to demonstrate a significant local effort in meeting water/sewer infrastructure needs.

Note the increase from .8% which was the standard.



What Are We Trying To Accomplish?

- **Community Planning** - Projects demonstrating thoughtful planning in prioritizing needs and capital
- **Public Facility Improvements** - Projects addressing health and safety, improved quality of life, greater availability, accessibility and affordability of services.
- **New Job Creation** - Projects creating new jobs for low and moderate income people, which increases the per capita income and reduces unemployment in a community.

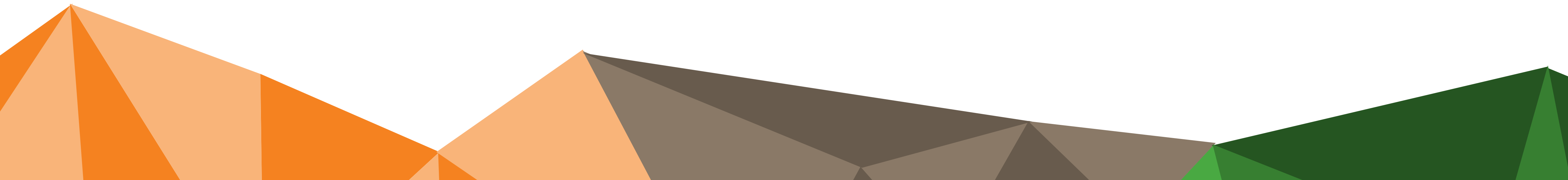
CDBG Innovative Grant Program

Application Procedures and Award Announcements

- Pre-Application Submission
- Deadline: April 1, 2022
- Invitation for Full Application notification: May 2, 2022

- Final Application Submission
- Deadline: August 31, 2022 at 11:59 PM

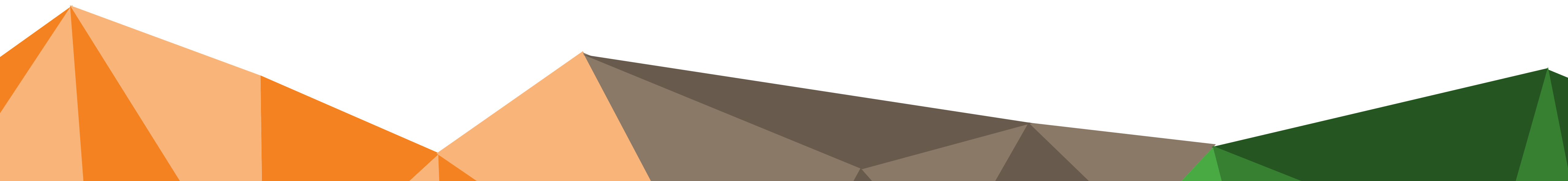
- Award Announcement
- Tentative Sept 30th





Thanks!

Any questions or comments?



Up Next...

Local Government Requirements

Brent Allen, Manager CDBG
Field Services



Local Government Responsibilities

What We Will Cover

- Audits
- 504 Requirements
- Procurement
- Public Hearings
- Timeliness
- Changes in Local Government Contact Information



This is Mayor Brian.



This is also Mayor Brian.

But he is better at submitting a CDBG application.



Why does he look so different?

Because he is happy.



Why is he so happy?

Because he knows what he has to do, as mayor, to submit an eligible application.



I want to be happy.

We all do Brian.



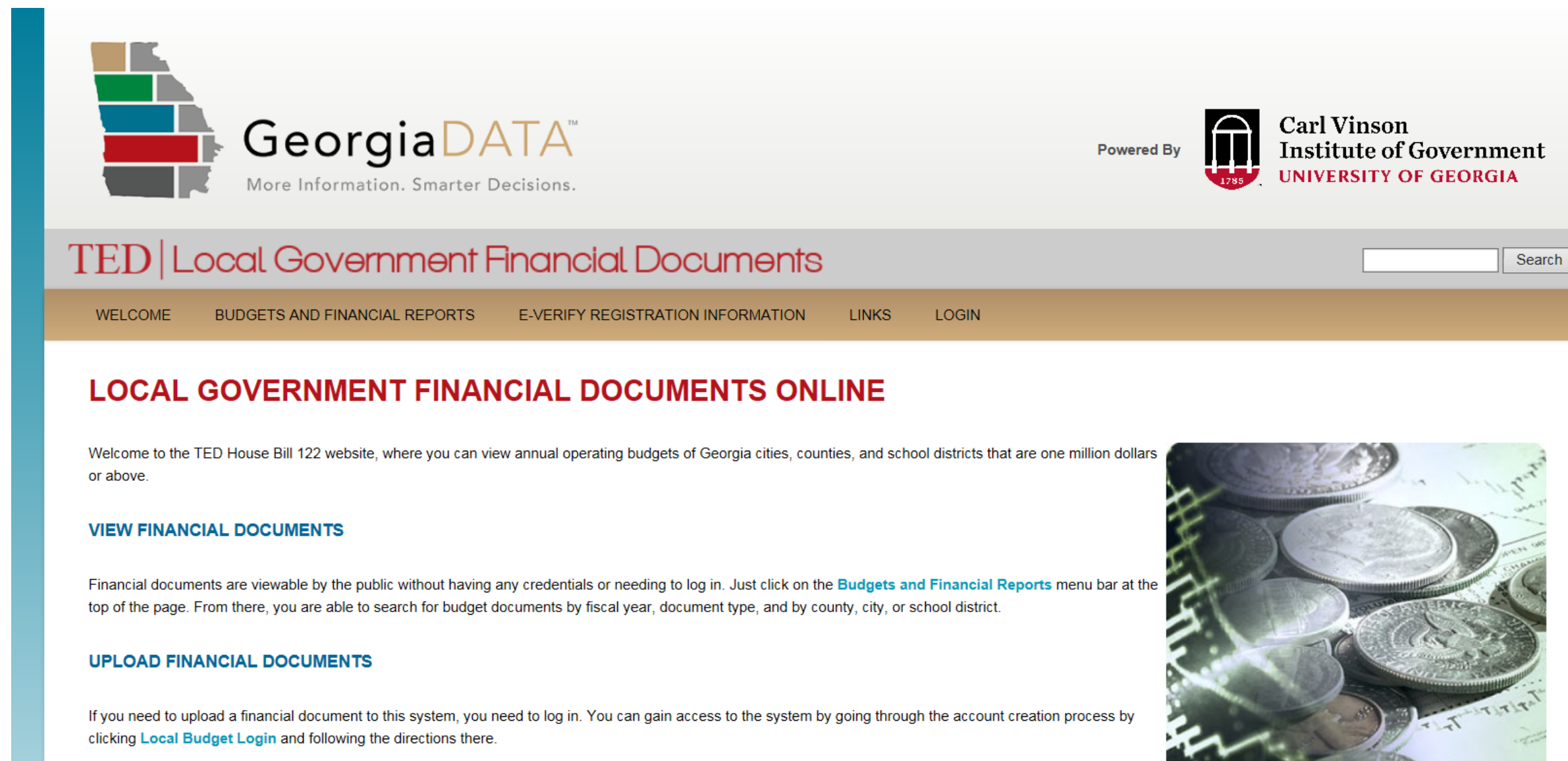
**Just pay attention and we will show you
how.**

So you can be happy just like this Brian.



Audits

- Send all audits to GA Department of Audits and Accounts
 - CDBG applications not eligible if audits delinquent
- Send to TED / Carl Vinson Institute of Government, Local Government Finance Documents
 - Web site maintaining audits for cities, counties, others
 - <https://ted.cviog.uga.edu/financial-documents/>



The screenshot shows the website for TED Local Government Financial Documents. At the top, there is a header with the GeorgiaDATA logo (a map of Georgia with colored squares) and the text "GeorgiaDATA™ More Information. Smarter Decisions." To the right of this is the logo for the Carl Vinson Institute of Government, University of Georgia, with the text "Powered By". Below the header is a navigation bar with the title "TED | Local Government Financial Documents" and a search box. Underneath the navigation bar is a menu with links: "WELCOME", "BUDGETS AND FINANCIAL REPORTS", "E-VERIFY REGISTRATION INFORMATION", "LINKS", and "LOGIN". The main content area has a heading "LOCAL GOVERNMENT FINANCIAL DOCUMENTS ONLINE" and a welcome message: "Welcome to the TED House Bill 122 website, where you can view annual operating budgets of Georgia cities, counties, and school districts that are one million dollars or above." Below this are two links: "VIEW FINANCIAL DOCUMENTS" and "UPLOAD FINANCIAL DOCUMENTS". A small image of coins is visible on the right side of the page.

GeorgiaDATA™
More Information. Smarter Decisions.

Powered By
Carl Vinson
Institute of Government
UNIVERSITY OF GEORGIA

TED | Local Government Financial Documents

WELCOME BUDGETS AND FINANCIAL REPORTS E-VERIFY REGISTRATION INFORMATION LINKS LOGIN

LOCAL GOVERNMENT FINANCIAL DOCUMENTS ONLINE

Welcome to the TED House Bill 122 website, where you can view annual operating budgets of Georgia cities, counties, and school districts that are one million dollars or above.

[VIEW FINANCIAL DOCUMENTS](#)

Financial documents are viewable by the public without having any credentials or needing to log in. Just click on the [Budgets and Financial Reports](#) menu bar at the top of the page. From there, you are able to search for budget documents by fiscal year, document type, and by county, city, or school district.

[UPLOAD FINANCIAL DOCUMENTS](#)

If you need to upload a financial document to this system, you need to log in. You can gain access to the system by going through the account creation process by clicking [Local Budget Login](#) and following the directions there.

Happy Mayor Brian submitted his audit.

His application didn't get kicked out due to a delinquent audit.



504 Requirement

- Applies to recipients of federal funds
- Similar to Americans with Disability Act
- If more than 15 employees, 504 Coordinator
 - Coordinates efforts to comply with regulation (maintain records)
- Complete DCA 504 Meeting Checklist
- Written transition plan if structural changes required
 - Steps necessary to complete changes
 - Time schedule to complete
 - Identify agency official responsible for implementation

Procurement Standards

□ All procurement transactions will be conducted in a manner providing full & open competition.

(24 CFR 570.489 (g))

NO:

- x Unreasonable requirements
- x Noncompetitive pricing practices
- x Noncompetitive awards to consultants that are on retainer contracts
- x Organizational conflicts of interest
- x Specifying only a brand name product
- x Any arbitrary action in the procurement process

Procurement Standards

- Documented Conflict of Interest Policy, which states:
 - No employee, officer, or agent...
“May participate in the selection, award, or administration of a contract supported by a Federal award if a real or apparent conflict of interest is present.”
- Prohibited conflicts
 - Persons with CDBG responsibilities, decision-making power or information may NOT:
 - Obtain a financial interest or benefit from CDBG activity
 - Have any interest in contract or subcontract
 - Applies to family members and business ties
 - Applies during tenure and 1 year after

Procurement Standards

- ❑ Example: Grant Administrator cannot assist grantee with drafting statements of work or RFPs for grant administration if they intend to submit proposal.
- ❑ May explain process, discuss instructions/process publicly available on DCA website

Methods of Procurement

- ❑ Small purchase: Procurements under \$100,000 (if allowed by local policy)
 - ❑ Require that price or rate quotations be obtained from an adequate number of qualified sources
 - ❑ Not appropriate for procurement of administrative or professional services
- ❑ Competitive Negotiation: Professional Services
- ❑ Competitive Sealed Bids: Public Works Construction
- ❑ Sole Source: Requires DCA Approval
 - ❑ The item or service is available from only one source;
 - ❑ Urgent public need will not allow for the delay caused by advertising;
 - ❑ Although a number of bids were solicited, only one response was received.

Procurement – Competitive Negotiation

- ❑ CDBG payments for Professional services are subject to the “competitive negotiation” requirements of 24 CFR 570.489 (g).
- ❑ Private grant writers/administrators
- ❑ Engineers and Architects
- ❑ Not applicable if contracting with Regional Commissions

Procurement – Competitive Negotiation

- ❑ Avoid the appearance of a conflict of interest:
 - ❑ Prior to CDBG application submission, both grant application services and grant administration services should be solicited using the same Request for Proposal (RFP).
 - ❑ For Engineering/Architectural services, preliminary reports and design and construction services should all be procured upfront using the appropriate RFP or Request for Qualification (RFQ) process.

Sample Notice for RFP

CITY/COUNTY

REQUEST FOR PROPOSALS

ADMINISTRATIVE & RELATED GRANT SERVICES

Date: **DATE**

Statements of qualifications and proposals are being requested from consultants with a strong record in successfully assisting local governments with grant writing for and implementation of Community Development Block Grant (CDBG) programs. Responding firms should be qualified to provide grant administration and related services including, but not limited to: Preparation of the grant application; Preparation of the Environmental Review Record; Preparation of draw/disbursement requests; Assistance with financial administration of grant funds and record keeping; Assistance with holding public hearings; Assistance with any required acquisition following the Uniform Relocation Assistance and Real Property Acquisition Act (URA); Assisting the engineer/architect with preparation of bid documents, advertising and conducting the bid opening; Assisting the city/county with Davis-Bacon and related labor requirements including weekly payroll review and employee interviews; Assisting the city/county with meeting Affirmatively Furthering Fair Housing (AFFH) requirements; and Preparation of close-out documents.

CITY/COUNTY plans are to contract with a reputable consulting firm for grant writing, and, if funded, for administration services, for a FY20CDBG project. The purpose of the project is to provide **DESCRIBE PROPOSED IMPROVEMENTS**.

Information which should be submitted for our evaluation is as follows:

- 1) History of firm and resources
- 2) CDBG experience, including other DCA grant programs
- 3) Capacity to complete scope of work
- 4) Current workload
- 5) Scope and level of service proposed
- 6) Experience with similar projects and list of references
- 7) Fees associated with grant writing, and grant administration, if the project is funded
- 8) Statement of Qualifications Form
- 9) Applicable Section 3 Certification forms, if claiming Section 3 Status

All contracts are subject to Federal and State contract provisions prescribed by the Georgia Department of Community Affairs. This project is covered under the requirements of Section 3 of the HUD Act of 1968, as amended and Section 3 Business Concerns are encouraged to apply.

Procurement – Competitive Negotiation

- 1) Establish or appoint a local Selection Review Committee
- 2) Determine the Selection Criteria
 - ❑ Prepare a Ratings Criteria Score Sheet
- 3) Develop the Request for Proposals (RFP) Package
 - ❑ May choose Request for Qualifications (RFQ) for engineering services
- 4) Publicize the RFP or RFQ.
 - ❑ Federal Section 3 requires communities to advertise the RFP in three locations. Allow 30 days for responses.
 - ❑ The publication must state **this is a Section 3 contract opportunity**.
 - ❑ **NEW:** If equal to or greater than \$100,000 place on Georgia's Procurement Registry, (HB 322)

Procurement – Competitive Negotiation

- 5) Distribute the RFP or RFQ to known providers
 - ❑ Consultants/Administrators sent to at least seven (7) known providers.
 - ❑ Engineering/architectural sent to at least ten (10) know providers.
 - ❑ Email delivery - use Request Delivery Receipt & Request Read Receipt to provide equivalent documentation when using this method.
 - ❑ Mail delivery – send Certified Return Receipt

Procurement – Competitive Negotiation

6) Review & Rate Proposals

- Give priority, to the greatest extent feasible, to Section 3 businesses.

7) Approve the Selection

- Consult city or county attorney about recommendation and proposed contract
- Based upon established reasons and attorney's recommendation, obtain full council/commission approval and execute contract.
- Notify unsuccessful applicants in writing

Procurement – Competitive Negotiation

- 8) Maintain Complete Records
 - RFP
 - Proof of Publication
 - Distribution List
 - Copies of Proposals Received
 - Scoring Sheets
 - Meeting Minutes – Council/Board Approval
 - Executed Contracts
 - Correspondence with Section 3 businesses

Procurement – Other Considerations

Unsuccessful grant applicants from previous years can use same grant administrator and engineer or architect :

- Must be for previous application cycle
 - Any older procurements will not be valid, and a new advertisement and solicitation of RFPs is required
- Followed acceptable procurement process
 - If the procurement process did not include the applicable Section 3 compliance requirements, then a new advertisement and RFP solicitation is required.
- Application must be for same (improved!!) project

Procurement – Documenting Compliance

Documenting Procurement in the Application

- Copy of the advertisement
- Georgia Procurement Registry evidence, if applicable
- Summary of all Request for Qualification/Proposal responses
- Award & Contract Documents
 - Include local government meeting minutes approving committee recommendation

Sole Source Requests

- Chief Elected Official request letter
- Description of Procurement Methodology
- Tear Sheet of the Bid Advertisement or RFP/RFQ
- Local Government's Attorney Opinion
- Professional Services Procurement
 - list of the active, qualified consultants or engineers / architects that were mailed the RFPs/RFQs (7 for grant administrators and 10 for engineers/architects)
 - certified return receipt documentation or adequate email documentation

Public Hearings

- Applicant must hold at least one public hearing to allow citizen participation, views, questions and input
 - Hearing should be held early in process to take citizen input into consideration
 - Hearings held after application is prepared are not allowing citizen participation
 - Public hearing requirement is not just a process box to be checked
 - Include estimated amount of funds proposed
 - Discuss plan to minimize displacement and assist any displaced persons



Public Hearings

- Notices must provide five (5) full days notice prior to hearing
 - 1st day begins on the day following the published notice
 - Monday – Ad appears in newspaper
 - Tuesday – Day 1
 - Wednesday – Day 2
 - Thursday – Day 3
 - Friday – Day 4
 - Saturday – Day 5
 - Sunday – Hearing can take place today or any subsequent day
- Placed in non-legal section of the general circulation local newspaper in block form



Public Hearings

- Must be held at time and locations convenient to potential or actual beneficiaries with accommodation of the handicapped (notices should include information to accommodate special needs).
- The needs of non-English speaking residents should be met in areas of significant concentration.
- Must maintain evidence of compliance.
- Certified minutes must be kept.



This Mayor Brian is not happy.

His application got kicked out since he didn't advertise, document and hold his public hearing correctly.



Happy Mayor Brian conducted a proper public hearing.

His citizens got to participate in the process of selecting a CDBG project.




Timeliness

- Your project has a Timeliness General Condition
 - 2-Year Timeline to complete project
 - **6 months:** clear all conditions, Environmental release of funds
 - **9 months:** Design work completed
 - **12 months:** Acquisition completed
 - **15 months:** Advertise project on Georgia Procurement Registry
 - **18 months:** Start construction
 - **24 months:** All funds drawn down
 - Grant Award may be canceled at any time if it becomes apparent the Recipient has not initiated the administrative activities necessary to allow project to proceed

Change in Local Government Contact

- DCA maintains a database of local officials and administrators for communicating official business
- To notify DCA of changes, please use log in page:
<https://apps.dca.ga.gov/LGContactsOnline/index.aspx>
- Use same log in credentials as with DCA Planning surveys
- If you need assistance, please contact research@dca.ga.gov

Change in Local Government Contact

**Georgia**
Department of Community Affairs
60 Executive Park South, NE - Atlanta, GA 30329

Local Government Contact Information

Please log in below to make sure that DCA has the **most current information** applicable for your government regarding each of the following areas or functions*:

Chief Elected Official (CEO)	Public Safety Director
Manager/Administrator	Public Works Superintendant or Director
Clerk	Fire Chief
Finance Director	Fire Marshal
Personnel Director	Police Chief
Planning/Development Director	Sheriff
Chief Building Official	Solid Waste Manager
Economic Development Director	Mainstreet Director
Emergency Management Director	Keep Georgia Beautiful Director
911 Coordinator	City Council Members or County Commissioners

Local Government Contact Information Login

Username

Password

Login

For each function, you may simply indicate:

- The name and contact information for the in-house person performing the function, or
- The contact information for the outside entity contracted to perform the function, or
- The function is not performed by our government at this time.

***NOTE: You can update any of the positions you wish on each log in, and can save your updates at any time to return later. You are encouraged to log in anytime throughout the year to update any position AS a change occurs.**

We all want to be happy.

No one wants an application to get kicked out.



Up Next...

Procurement, Citizens Participation

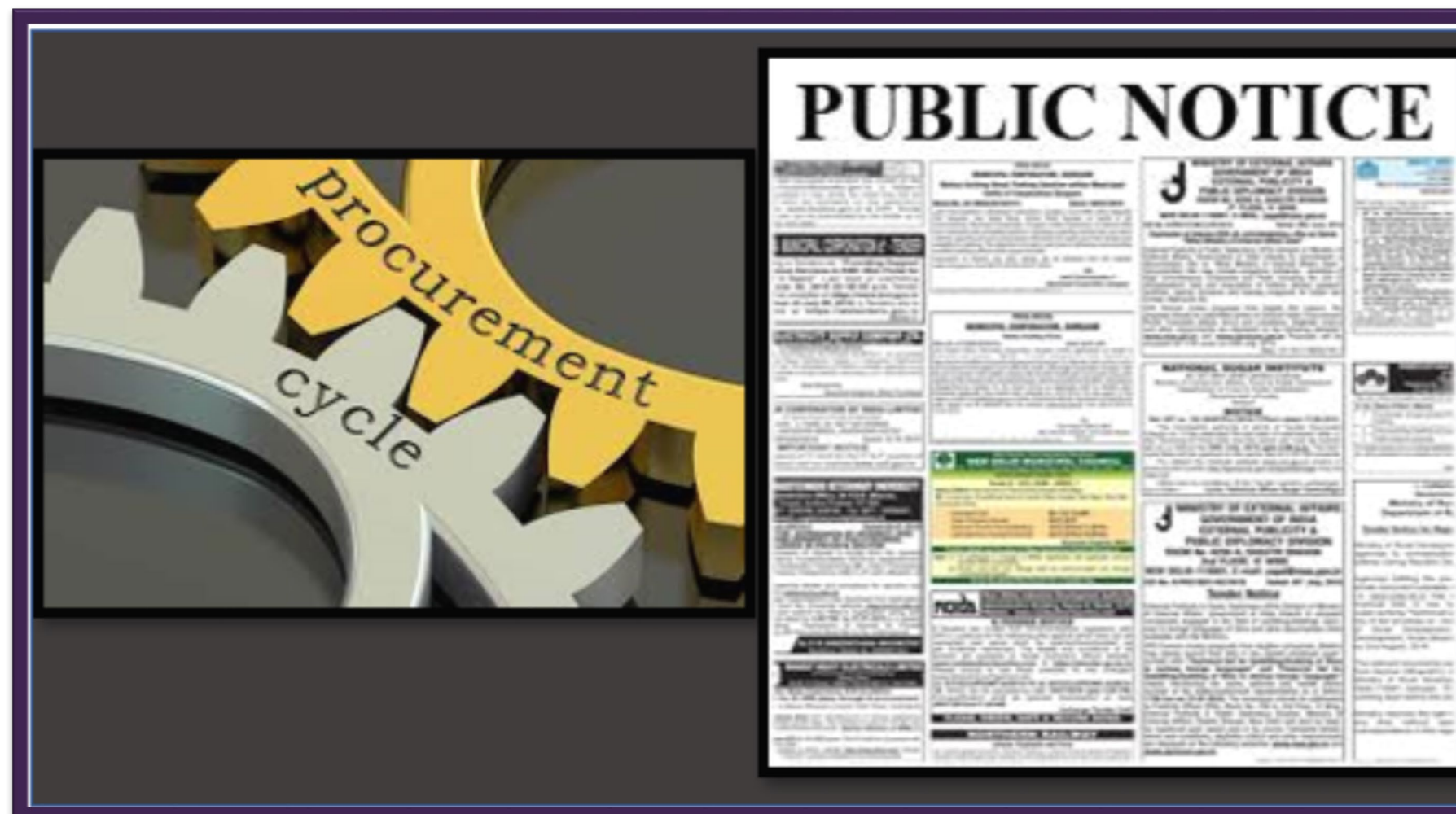
Kathleen Vaughn, CDBG Compliance Manager

DCA – Office of Community Development



Applicant Compliance Requirements

Professional Procurement
&
Citizen Participation



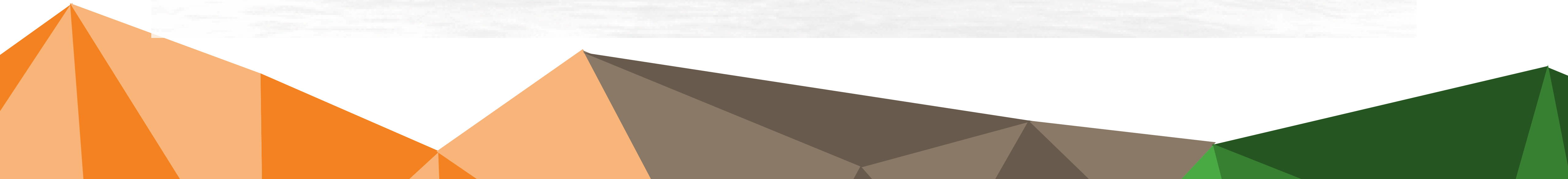
Kathleen Vaughn, Compliance Manager

2022 CDBG Annual Competition



Procurement

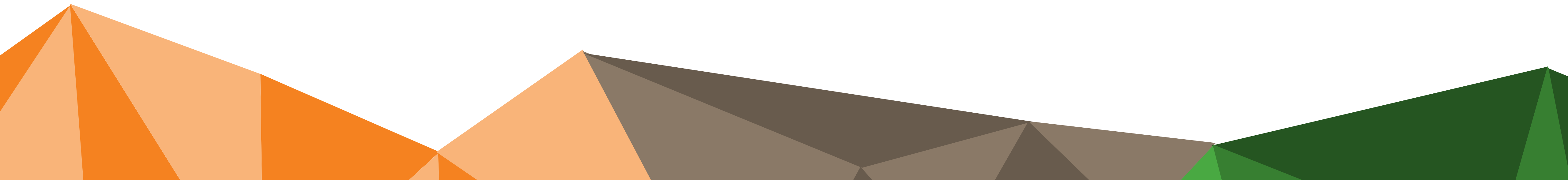
- ✓ Standards
- ✓ Methods
- ✓ Sole Source Requirements
- ✓ Documenting Procurement in the application



Procurement Standards

DCA's procurement policies and procedures implement the requirements of 24 CFR 570.489 (g), which says the State shall establish requirements for procurement policies and procedures for units of general local government, based on full and open competition.

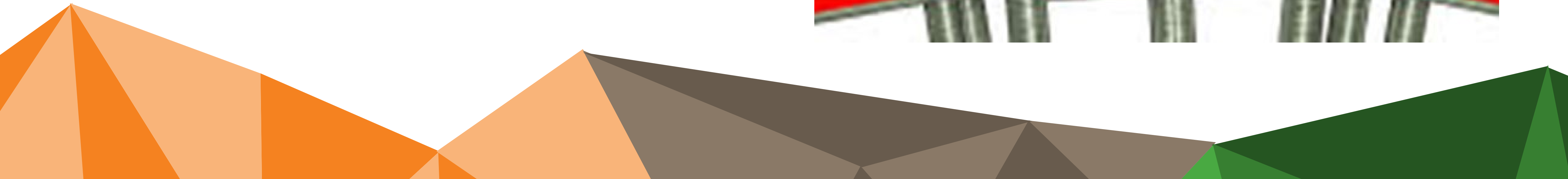
- Identification of Methods of Procurement and their applicability
- Prohibition of cost plus a percentage of cost & percentage of construction costs methods of contracting
- Assurance that all purchase orders and contracts include any clauses required by Federal statutes, Executive orders, and implementing regulations
- Subrecipient and contractor determinations shall be made in accordance with the standards in 2 CFR 200.330.



Procurement transactions will be provided in a manner providing full & open competition

Avoid:

- ✗ Unreasonable requirements
- ✗ Noncompetitive pricing practices
- ✗ Noncompetitive awards to consultants that are on retainer contracts
- ✗ Organizational conflicts of interest
- ✗ Specifying only a brand name product
- ✗ Any arbitrary action in the procurement process



Procurement Standards

Documented Conflict of Interest Policy, which states:

- No employee, officer, or agent...
- “May participate in the selection, award, or administration of a contract supported by a Federal award if a real or apparent conflict of interest is present.”

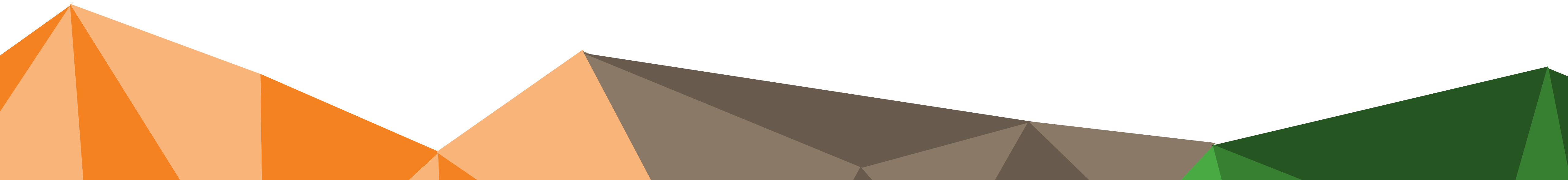
Prohibited Conflicts

Persons with CDBG responsibilities, decision-making power or information may **NOT:**


- Obtain a financial interest or benefit from CDBG activity
- Have any interest in contract or subcontract
- Applies to family members and business ties
- Applies during tenure and 1 year after

Example: Grant Administrator cannot assist grantee with drafting statements of work or RFPs for grant administration if they intend to submit proposal.

May explain process, discuss instructions/process publicly available on DCA website



Standards – Selection Procedures

- ✓ Accurate description of the technical requirements for material, product, or service without restricting competition
 - ✓ Clear requirements and evaluation factors
 - ✓ The review of proposed procurement actions by Recipient officials to avoid purchasing unnecessary or duplicative items.
 - ✓ A cost or price analysis for every procurement action
 - ✓ Consideration of contractor integrity, compliance with public policy, record of past performance, and financial and technical resources in the selection process
- 

DCA's Section 3 Policy

Economic Opportunities for Low & Very Low-Income Persons

- Applies when Recipient's award exceeds \$200,000

Section 3 Business - A business concern meeting at least one of the following criteria, documented within the last six-month period:

- 51% or more owned by low-income persons
- Over 75 % of the labor hours are performed by Section 3 workers over the prior three-month period
- at least 51% owned by current public housing residents

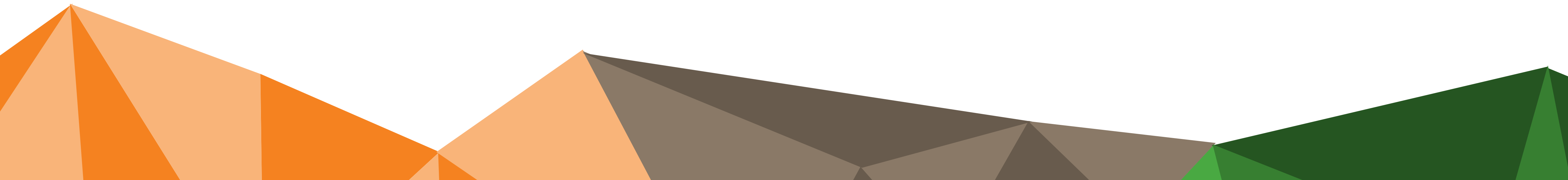
<https://portalapps.hud.gov/Sec3BusReg/BRegistry/SearchBusiness>

DCA's Section 3 Policy – Cont'd

Advertising Requirements

- Contract Opportunities must be posted to at least 3 locations
 - GPR, your website, Dodge Room, newspaper, DOL, DFCS, local workforce board

All ads must include this Section 3 language: **“This is a Section 3 Covered Contract. Section 3 Business Concerns are encouraged to apply.”**



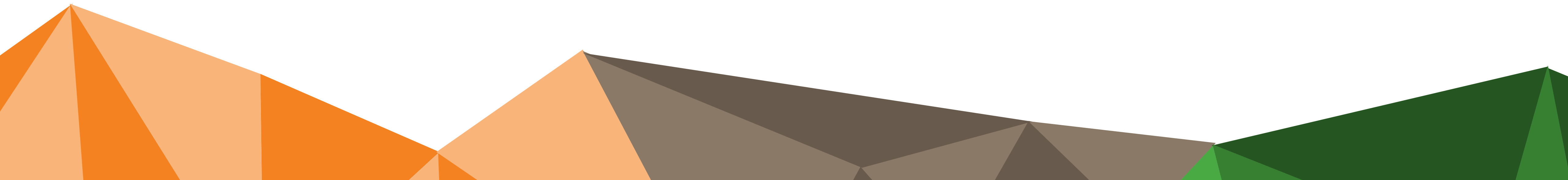
Methods of Procurement

- **Small purchase:** Procurements under \$100,000 (if allowed by local policy).
 - Require that price or rate quotations be obtained at least three (3) sources.
 - Not appropriate for procurement of administrative or professional services
- **Competitive Proposals:** Professional Services
- **Competitive Sealed Bids:** Public Works Construction
- **Sole Source:** Requires DCA Approval
 - The item or service is available from only one source;
 - Urgent public need will not allow for the delay caused by advertising;
 - Although a number of bids/responses were solicited, only one response was received.

Procurement – Competitive Negotiation

❑ CDBG payments for Professional services are subject to the “competitive negotiation” requirements of 24 CFR 570.489 (g).

- ❑ Private grant writers/administrators
- ❑ Engineers and Architects
- ❑ Not applicable if contracting with Regional Commissions



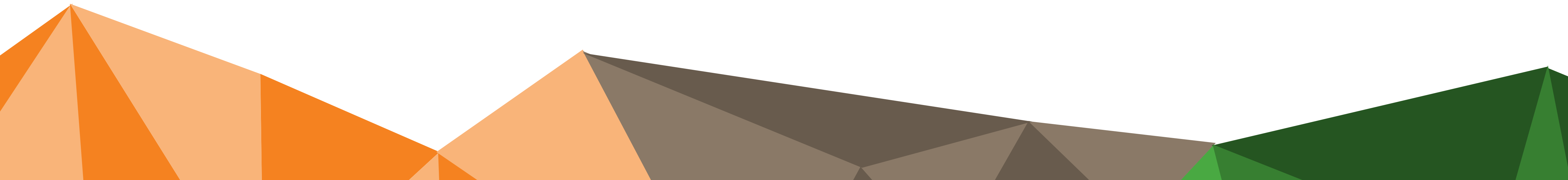
Competitive Negotiation

Avoid the appearance of a conflict of interest:

- Prior to CDBG application submission, both grant application services and grant administration services should be solicited using the same Request for Proposal (RFP).
- For Engineering/Architectural services, preliminary reports and design and construction services should all be procured upfront using the appropriate RFP or Request for Qualification (RFQ) process.

STEP-BY-STEP

- 1) Establish or appoint a local Selection Review Committee
- 2) Determine the Selection Criteria
 - Prepare a Ratings Criteria Score Sheet
- 3) Develop the Request for Proposals (RFP) Package
 - May choose Request for Qualifications (RFQ) for engineering/architectural services
 - Include the evaluation factors, level of importance, deadlines, and contact information.



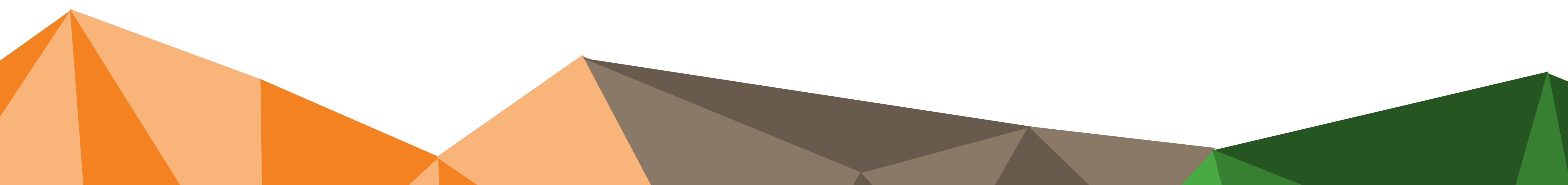
STEP-BY-STEP

4) Publicize the RFP or RFQ.

- Federal Section 3 requires communities to advertise the RFP in three locations.
- The publication must state **this is a Section 3 contract opportunity**.
- Allow 30 days for responses.
- **NEW:** If equal to or greater than \$100,000 place on Georgia's Procurement Registry, (HB 322)

All GPR advertisements must state **this is a Section 3 contract opportunity**.

STEP-BY-STEP

- 5) Distribute the RFP or RFQ to known providers
- Consultants/Administrators sent to at least seven (7) known providers.
 - Engineering/architectural sent to at least ten (10) known providers.
 - Email delivery - use Request Delivery Receipt & Request Read Receipt
 - Mail delivery – send Certified Return Receipt
 - DCA Consultant List - <https://www.dca.ga.gov/node/5515>
- 

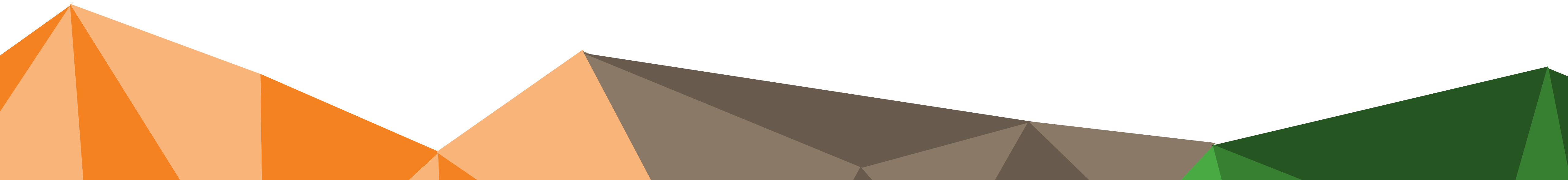
STEP-BY-STEP

6) Review & Rate Proposals

- ❑ Give priority, to the greatest extent feasible, to Section 3 businesses.

7) Approve the Selection

- ❑ Consult city or county attorney about recommendation and proposed contract
- ❑ Based upon established reasons and attorney's recommendation, obtain full council/commission approval and execute contract.
- ❑ Notify unsuccessful applicants in writing



STEP-BY-STEP

8) Maintain Complete Records

- RFP
- Proof of Publication
- Proof of Distribution
- Copies of Proposals Received
- Scoring Sheets
- Meeting Minutes – Council/Board Approval
- Executed Contracts
- Correspondence with Section 3 businesses



Statements of qualifications and proposals are being requested from **engineering/architectural** firms with a strong record in successfully assisting local governments with the implementation of Community Development Block Grant (CDBG) programs. Responding firms should be technically qualified and licensed in the State of Georgia to provide these services.

Plans are to contract for **engineering/architectural** preliminary design services required for a potential **FY20__ CDBG** project and, if funded, for engineering/architectural services for the implementation of the project. The purpose of the project is to provide **TYPE OF IMPROVEMENTS**.

Information which should be submitted for our evaluation is as follows:

- 1) History of firm and resources
- 2) CDBG/EIP/RDF experience, including other DCA grant programs
- 3) Key personnel/qualifications
- 4) Current workload
- 5) Scope and level of service proposed
- 6) Experience with similar projects and list of references
- 7) Fees and/or Percentages (if any) associated with the Preliminary Engineering Report (PER) for the application, and Design and Construction Management Services, if the project is funded. The draft PER would be needed no later than _____).
- 8) Errors and Omissions Insurance
- 9) Statement of Qualifications Form
- 10) Section 3 Certification Form (Only Submit with your Proposal if you are claiming Section 3 Status.)

All contracts are subject to Federal and State contract provisions prescribed by the Georgia Department of Community Affairs. This project is covered under the requirements of Section 3 of the HUD Act of 1968, as amended and Section 3 Business Concerns are encouraged to apply.

CITY/COUNTY also abides by the following laws as they pertain to HUD Assisted Projects: Title VI of the Civil Rights Act of 1964; Section 109 of the Housing and Community Development Act of 1974, Title 1; Title VII of the Civil Rights Act of 1968 (Fair Housing Act); Section 104(b)(2) of the Housing and Community Development Act of 1974; Section 504 of the Rehabilitation Act of 1973 as amended; Title II of the Americans with Disabilities Act of 1990 (ADA); and the Architectural Barriers Act of 1968.

Interested parties should request copies of the Statement of Qualifications Form and Section 3 Solicitation Package prior to preparing and submitting their proposal. Proposals should be received no later than 5:00 PM on **[30 DAYS AFTER PUBLICATION]**. Proposals received after the above date and time may not be considered. We reserve the right to accept or reject any and all proposals and to waive informalities in the proposal process. Questions, Statement of Qualifications and Section 3 Certification form requests (i.e., request for Section 3 preference), and proposal packages should be submitted to the name and address listed below:

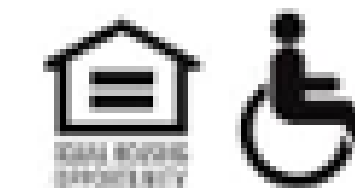
CLIENT CONTACT

CLIENT

ADDRESS

Phone:

Email:



Appendix A Sample Email Request

Copy and paste the "email" below, including the "Subject" line, and send to your selected Engineering/Architectural firm. Request for Delivery Receipt and Request for Statement of Qualifications Form to your email.

***Subject: PLEASE RESPOND: CITY/COUNTY REQUEST FOR DELIVERY RECEIPT AND REQUEST FOR STATEMENT OF QUALIFICATIONS FORM GRANT SERVICES -

FROM: CITY/COUNTY, Georgia

RE: CITY/COUNTY Solicitation Package
FY20 CDBG/EIP/RDF

PLEASE REPLY TO THIS EMAIL to let us know when you are submitting a proposal.

Thank you,

CITY/COUNTY CONTACT
CITY/COUNTY NAME

CITY/COUNTY
REQUEST FOR DELIVERY RECEIPT AND REQUEST FOR STATEMENT OF QUALIFICATIONS FORM
ENGINEERING AND/OR ARCHITECTURAL

Date: DATE

Statements of qualifications and proposals are being requested from firms with a strong record in successfully assisting local government with the Development Block Grant (CDBG) programs. Firms are licensed in the State of Georgia to provide these services.

Plans are to contract for engineering/architectural services if funded. The purpose of the project is to provide technical assistance to the City/County.

Information which should be submitted for our consideration:

- 1) History of firm and resources
- 2) CDBG/EIP/RDF experience, including other projects
- 3) Key personnel/qualifications
- 4) Current workload
- 5) Scope and level of service proposed
- 6) Experience with similar projects and list of references
- 7) Fees and/or Percentages (if any) associated with the application, and Design and Construction if funded. The draft PER would be needed for the application.
- 8) Errors and Omissions Insurance

9) Statement of Qualification 10) Section 3 Certification Form

All contracts are subject to Federal Acquisition Regulation (FAR) and the Code of Community Affairs. This project is as amended and Section 3 Business Development Act.

CITY/COUNTY also abides by the Civil Rights Act of 1964; Section 1968 (Fair Housing Act); Section 504 of the Rehabilitation Act of 1990 (ADA); and the Architectural Barriers Act.

Interested parties should request copy of the solicitation prior to preparing and submitting their proposals. Proposals must be submitted **AFTER PUBLICATION**. Proposals are subject to the right to accept or reject any and all proposals. Statement of Qualifications and Section 3 Certification Form to the name and address listed below.

CITY/COUNTY CONTACT
CITY/COUNTY
ADDRESS
Phone: / Email:

Engineering Firm Sample Statement

NAME OF FIRM: _____

ADDRESS: _____

1. Years in Business in Present Form: _____

2. Firms History and Resource Capability to _____

3. Titles, Names, and Addresses of all Officers _____

4. List categories in which firm is legally qualified to perform work where applicable. _____

5. Does your firm carry Errors and Omissions Insurance? _____

6. If you were awarded the design, bid phase of the project, would you be able to complete the project within the draft PER deadline? _____

7. Does your firm charge for the preliminary design? If yes, what would the charge be? \$_____

Can your firm meet the draft PER deadline? _____

8. List up to five (5) projects which demonstrate your firm's ability to complete projects. Name, location, owner, year, contract amount, and description of project.

1. _____
2. _____
3. _____
4. _____
5. _____

9. List key personnel (with qualifications) likely to be involved on these projects and explain their specific role in CDBG work.

10. List three (3) references for the Firm.

1. _____
2. _____
3. _____

11. Are you a Section 3 Business Concern? Yes _____ No _____

If yes, the Attached Section 3 Business Concern Certification, Previous Certification and Action Plan must be filled out, signed, notarized, and submitted with your proposal.

Is the signed and notarized Section 3 Business Concern Certification, Previous Certification and Action Plan attached to your proposal? Yes _____

~~If no, you will only need to submit the Section 3 forms if you are the successful proposer.~~

12. Certifying that:

Mr./Mrs./Ms. _____ (signature) being duly sworn deposes and states that he/she is the _____ (title) of _____ (name of firm) and that answers to the foregoing questions and all statements herein contained are true and correct.

ENGINEERING/ARCHITECTURAL SAMPLE RATINGS CRITERION

CONTACT: _____

NAME OF FIRM: _____

FIRM ADDRESS: _____

Evaluate the Architectural and/or Engineering Firm based on the points assigned to each of the following selection criterion

		CIRCLE POINTS			POINTS ASSIGNED
	CRITERION	POOR	GOOD	EXCELLENT	
1.	Ability to provide the disciplines necessary for this project.	0	1	2	_____
2.	Firm's experience with this type of construction.	0	1	2	_____
3.	Key personnel experience with this type of construction	0	1	2	_____
4.	Quality of reference information.	0	1	2	_____
5.	Has Firm had experience with Community Development Block Grant (CDBG) projects?	0	1	2	_____
6.	Is price competitive?	0	1	2	_____
TOTAL POINTS					

Firm can meet PER/PAR deadline? ___ Yes ___ No

Firm carries Errors and Omissions insurance? ___ Yes ___ No

COMMENTS ON WHY FIRM SHOULD BE SELECTED:	

NAME: _____

DATE OF REVIEW: _____

NAME	DATE SENT	RECEIVED	SCORE/COMMENTS
██████████	10/02/2019	YES	65
██████████	10/02/2019	NO	
██████████	10/02/2019	NO	
██████████	10/02/2019	NO	
██████████████████	10/02/2019	YES	70
██████████████████	10/02/2019	NO	
██████████	10/02/2019	NO	
██████████████████	10/02/2019	NO	
██████████████████	10/02/2019	NO	
██████████████████	10/02/2019	YES	67
██████████	10/02/2019	YES	72 Selected as Project Architect
██████████	GA Procurement Registry Request	NO	

Sole Source Requests

- Chief Elected Official request letter
- Description of Procurement Methodology
- Tear Sheet of the Bid Advertisement or RFPs/RFQs (proof of posting in 3 locations)
- Local Government's Attorney Opinion
- Professional Services Procurement
 - list of the active, qualified consultants or engineers / architects that were mailed the RFPs/RFQs (7 for grant administrators and 10 for engineers/architects)
 - certified return receipt documentation or adequate email documentation

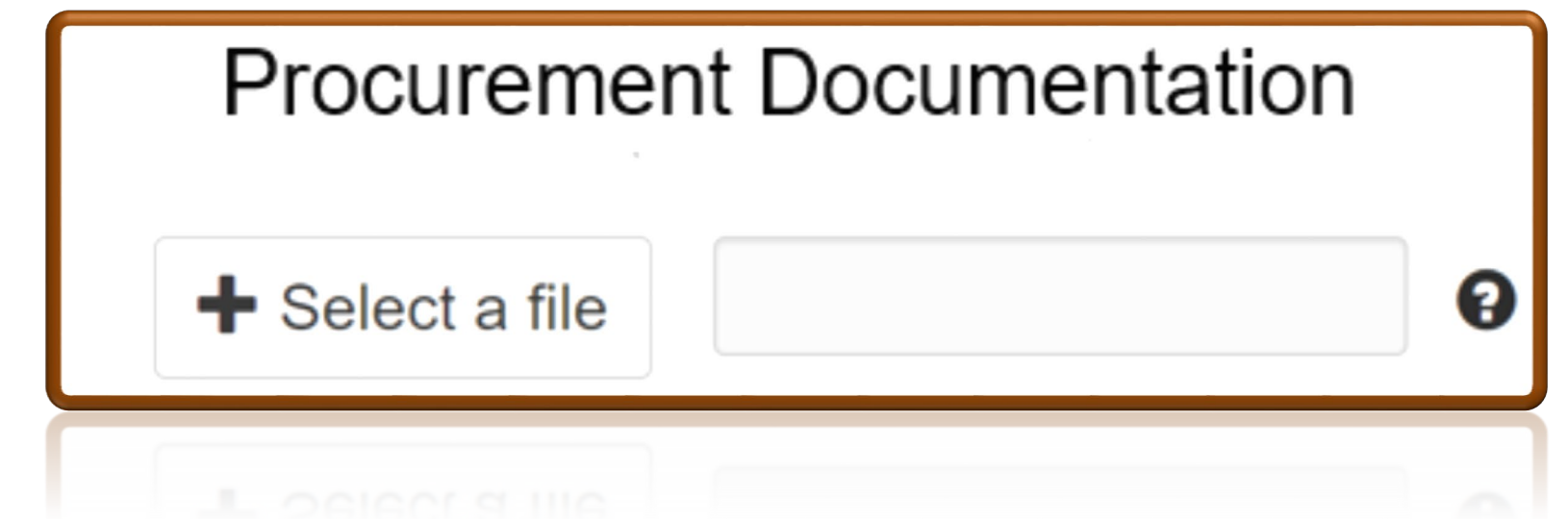
Procurement – Other Considerations

Unsuccessful grant applicants from the previous year can use same grant administrator and engineer or architect :

- Must be for previous application cycle
 - Any older procurements will not be valid, and a new advertisement and solicitation of RFPs is required
- Followed acceptable procurement process
- Application must be for same (improved!!) project

Documenting Procurement in the Application

- Copy of the advertisement
- Georgia Procurement Registry evidence, if applicable
- Summary of all Request for Qualification/Proposal responses
- Award & Contract Documents
 - Include local government meeting minutes approving committee recommendation

A screenshot of a web interface for uploading procurement documentation. It features a title bar 'Procurement Documentation' in a brown box. Below the title bar, there is a button with a plus icon and the text 'Select a file', followed by a text input field, and a help icon (question mark in a circle) on the right. The entire interface is reflected below it.

Procurement Documentation

+ Select a file

Sole Source requests must be received prior to Application deadline.



Common Mistakes

- Did not advertise in 3 locations
- Section 3 language did not appear in all advertisements
- Did not allow at least 30 days for responses
- Did not retain proof of solicitation delivery (read receipts)
- Meeting minutes indicated the highest scored respondent was not selected without explanation



Resources

- CDBG Manuals & Local Gov Officials' Handbook,
<https://www.dca.ga.gov/node/2341/documents/2254>
- HB 322,
<https://gov.georgia.gov/document/signed-legislation/hb-322pdf/download>
- DCA's Professional Procurement Instructional Materials,
<https://www.dca.ga.gov/node/3741/documents/10>
- DCA Section 3 Certification & Action Plan:
<https://www.dca.ga.gov/node/3741/documents/10>



Citizen Participation

Public Hearings

Applicants must hold at least one public hearing to allow citizen participation, views, questions and input

- Hearing should be held early in process to take citizen input into consideration
- Hearings held after application is prepared are not allowing citizen participation
- Include estimated amount of funds proposed
- Discuss plan to minimize displacement and assist any displaced persons
- Sample hearing notices in Appendix of Applicants' Manual – English & Spanish



Public Hearings

- Notices must provide five (5) full days notice prior to hearing
 - 1st day begins on the day following the published notice
 - Monday – Ad appears in newspaper
 - Tuesday – Day 1
 - Wednesday – Day 2
 - Thursday – Day 3
 - Friday – Day 4
 - Saturday – Day 5
 - Sunday – Hearing can take place today or any subsequent day

Placed in non-legal section of the general circulation local newspaper in block form



**NOTICE
OF
PUBLIC
HEARING**

Public Hearings

- Must be held at time and locations convenient to potential or actual beneficiaries with accommodation of the handicapped (notices should include information to accommodate special needs).
- Virtual Hearings must allow questions in real time, with answers coming directly from the elected representatives to all “attendees”.
- The needs of non-English speaking residents should be met in areas of significant concentration.
- Must maintain evidence of compliance.
- Certified minutes must be kept.



Bonus Points - Robust Citizen Participation

Bonus Point Documentation

Evidence of Release of Funds

Choose File

Evidence of EIP/RDF Revolving Loan Fund Closure

Choose File

Evidence of Additional Citizens Participation Efforts

Choose File

Extra efforts to provide an opportunity for citizens, especially LMI citizens, to participate in an advisory role in the planning, implementation, and assessment of the programs and projects funded through CDBG activities

- Water Bill Announcements
- Social Media Announcements
- Meeting times and frequency
- Flyers - when, where, how often
- Informative / interactive webinars

Language Access Requirements

Title VI of the Civil Rights Act of 1964 and pursuant to EO 13166 requires meaningful access to information and services for Limited English Proficiency (LEP) persons.

- Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.
- Noted as speaking English less than “very well” in America Community Survey (ACS) Data Table S1601: Language Spoken at Home

Language Access Requirements

The size of the language group determines the recommended provision for written language assistance:

- **Translate vital documents**
 - ☐ 1,000 or more in a single language or more than 5% of the eligible population or beneficiaries and more than 50 in number .
 - ☐ **Translated written notice of right to receive free oral interpretation of documents.**
 - ☐ More than 5% of the eligible population or beneficiaries and 50 or less in number
- **No written translation is required.**
 - ☐ 5% or less of the eligible population or beneficiaries and less than 1,000 in number

Meaningful Access - Data



Please Update Your Bookmark

American FactFinder has been decommissioned and is no longer available. The data you received from this page are now available from:

<https://data.census.gov/cedsci/table?q=1600000US1921000&tid=ACST5Y2017.S1601&q=S1601>

Questions? Read the [deep linking guide](#).

✓ American Community Survey Data Table S1601 5-Year Estimates

- B16001 no longer updates

Now hosted on <https://data.census.gov/>

✓ DCA's CDBG Applicant Concentration Maps

- <https://georgia-dca.maps.arcgis.com/home/index.html>

$$708 / 3,873 = .1828 \times 100 = 18.28\%$$

LANGUAGE SPOKEN AT HOME

Survey/Program: American Community Survey TableID: S1601 Product: 2019: ACS 5-Year Estimates Subject Tables

Notes

Selections

1 Geo

Years

Topics

Surveys

123 Codes

Hide

Filter

Transpose

Margin of Error

Restore

Excel

Download

More Data

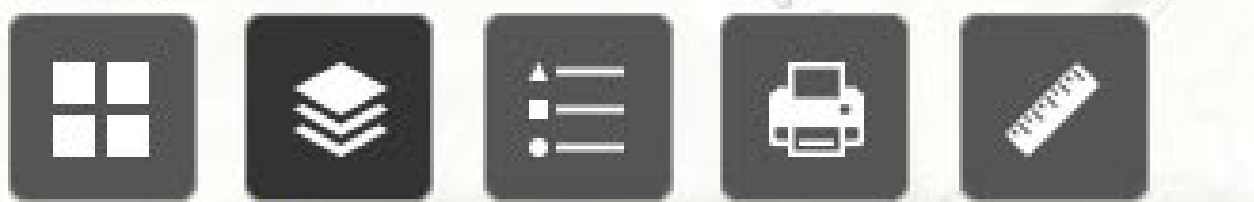
Print

Map

	Cornelia city, Georgia						Columns Cell/Column Notes
	Total		Percent of specified language speakers				
			Speak English less than "very well"		Percent speak English less than "very well"		
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	
▼ Population 5 years and over	3,873	±128	823	±337	21.2%	±8.8	
Speak only English	2,478	±483	(X)	(X)	(X)	(X)	
Speak a language other than English	1,395	±441	823	±337	59.0%	±12.6	
▼ SPEAK A LANGUAGE OTHER THAN ENGLISH							
▼ Spanish	1,086	±453	708	±344	65.2%	±13.0	
5 to 17 years old	421	±248	187	±159	44.4%	±26.7	
18 to 64 years old	665	±270	521	±230	78.3%	±14.8	
65 years old and over	0	±13	0	±13	-	**	
▼ Other Indo-European languages	8	±16	0	±13	0.0%	±100.0	
5 to 17 years old	0	±13	0	±13	-	**	



Find address or place



Layers

- Layers
- ☐ Block Groups 2021
- ☐ Low to Moderate Income 51%
- ☐ Housing Facility Deficiency 89%
- ☐ Minority Concentration 51%+
- ☒ City Language Spoken 2021
- ☒ County Language Spoken 2021
- ☒ Cities
- ☒ Counties

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population	Translated vital documents
More than 5% of the eligible population or beneficiaries and more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries and 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

Note: In the case where the overall jurisdiction numbers fall below the threshold to provide translated written documents but existing or planned DCA target areas exist, the DCA Sub recipient must evaluate whether there are limited English proficient households within the target areas that may need notification or other LAP services. The Sub recipient's evaluation should use local knowledge or data or other relevant data in conducting its evaluation and should indicate its conclusions regarding the steps necessary reach out to these households in the language they speak to ensure that adequate notification is achieved. This evaluation will be particularly important for housing grants where eligible applicants for assistance may need application or other documents translated to take advantage of available services.



**CDBG
Application:
Required
Documentation
& Common
Mistakes**

•**Required Documentation**

- Notice Tear Sheet
- Table S1601

•**Common Mistakes**

- Incorrect hearing date is published
 - English and Spanish
- Threshold for translation is incorrectly determined

Resources

Language Access Plan Template for CDBG & DCA's Sub-Recipient Language Access Plan Template Guidance for CDBG

<https://www.dca.ga.gov/node/3858>

Thank you!

Kathleen Vaughn,
Compliance Manager
(404)679-0594
Kathleen.Vaughn@dca.ga.gov





Up Next...

Environmental Review Requirements

Rob Shaw

Process Management Specialist



NEPA Environmental Procedure



• January 11, 2022

Rob Shaw

Statutory & Regulatory Structure

- National Environmental Policy Act (NEPA) and implementing regulations of the Council on Environmental Quality (40 CFR Parts 1500-1508).
- HUD Regulations (24 CFR Part 58).
- NEPA-Related Laws and Authorities (List at 24 CFR 58.5).

<https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities/>

Environmental Review Regulations

24 CFR Part 58

- HUD's regulation allows local units of government to perform NEPA responsibilities with States reviewing in place of HUD
- Regulation titled "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities"
- Covered in Chapter 2 of the Recipients' Manual
- Compliance is a General Condition of all CDBG Awards

Who Is Responsible for the Environmental Review?

- Chief Elected Official (CEO)
 - Assumes responsibility for environmental review
 - Must sign the Finding of No Significant Impact (FONSI) and the Request for Release of Funds/Certification
 - Accepts the jurisdiction of the Federal Courts as the responsible entity in environmental matters for this certification

When should the Environmental Review start?

- Before making choice limiting actions, including acquisition
 - Must be able to reject the site
- Before commitment of funds – 24 CFR Part 58.22 (a)
 - Neither a recipient nor any participant, including private non-profit or for-profit entity, may commit federal funds before approval of the RROF
 - Neither a recipient nor any participant may commit non-HUD funds if the project has the potential to have an adverse impact or limit the choice of reasonable alternatives.

Importance of Early Start

- Begin environmental review process as soon as possible.
- Typical times required to complete review range from 1 to 120+ days.

Environmental Review Process High Level Overview

- Determine the Level of Environmental Review Required
- **Applies to the project as a whole not just CDBG funds**
- Create the Environmental Review Record
 - Must be Available to the Public at the local government
- Complete the Environmental Review and document compliance with the related Laws
- Publish Required Notices According to Level of Review

Environmental Review Process (cont.)

- Submit the Request for Release of Funds and supporting documentation to DCA
- DCA issues Release of Funds Letter “Removing Environmental Conditions”
- Maintain Documentation of Compliance (Including Mitigation) in the Environmental Review Record (ERR)

Levels of Environmental Review

- 24 CFR Part 58.34(a) Exempt
- 24 CFR Part 58.35 Categorically Excluded
 - Categorical exclusions SUBJECT to laws and authorities at 24 CFR Part 58.5
 - Categorical exclusions NOT subject to laws and authorities at 24 CFR Part 58.5
- 24 CFR Part 58.36 Environmental Assessment
- 24 CFR Part 58.37 Environmental Impact Statement

Levels of Environmental Review

§58.34 - EXEMPT	§58.35(b) CATEGORICALLY EXCLUDED NOT Subject to §58.5
<ul style="list-style-type: none">• Environmental and other studies• Resource Identification• Development of plans and strategies• Information and financial services• Administrative and Management Activities• Public Services (i.e.: employment, crime, child-care, prevention, health, drug abuse, education, welfare, counseling, energy conservation, recreational needs• Inspections and testing for hazards or defects• Purchase insurance and tools• Engineering or design costs• Technical assistance and training• Temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair or restoration activities to control or arrest the effects from disasters or imminent threats to public safety, including those resulting from physical deterioration.• Payments of principal /interest on loans or obligations guaranteed by HUD	<ul style="list-style-type: none">• Tenant-based rental assistance• Supportive services such as health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent, mortgage, or utilities, assistance in gaining access to government benefits.• Operating costs including maintenance, furnishings, security, equipment, operation, supplies, utilities, staff training and recruitment.• Economic development activities including equipment purchase, inventory financing, interest subsidy, operating costs, and other expenses not associated with construction or expansion.• Activities to assist homeownership of existing dwelling units or units under construction, including closing costs and down-payment assistance to homebuyers, interest buy downs or other actions resulting in transfer of title.• Affordable housing pre-development costs: legal consulting, developer and other site-option costs, project financing, administrative costs for loan commitments, zoning approvals, and other activities which don't have a physical impact.• Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under §58, if: approval is by same the RE, and re-evaluation is not required, per §58.47

Levels of Environmental Review

§58.35(a) - CATEGORICALLY Excluded Subject to §58.5	§58.36 - NEPA Environmental Assessment
TYPES OF ACTIVITIES	
<p>Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are already in place and will be retained in the same use without change in size or capacity of more than 20%</p> <ul style="list-style-type: none"> • Replacement of water or sewer lines • Reconstruction of curbs & sidewalks • Repaving of streets <p>Special projects directed toward the removal of material and architectural barriers that restrict the mobility of and accessibility to the elderly and handicapped.</p> <p><u>Single Family Housing Rehabilitation</u></p> <ul style="list-style-type: none"> • Unit density is not increased beyond 4 units, • Project doesn't involve change in land use from residential to non-residential <p><u>Multifamily Housing Rehabilitation</u></p> <ul style="list-style-type: none"> • Unit density change is not more than 20% • Project doesn't involve change in land use from residential to non-residential • Rehabilitation cost is < 75% of the estimated cost of replacement after rehabilitation <p><u>Non-Residential Structures</u></p> <ul style="list-style-type: none"> • Facilities and improvements were in place and will not be changed in size or capacity by more than 20%; • Activity does not involve change in land use from non-residential to commercial to industrial, or one industrial use to another; <p>Individual action (e.g., disposition, new construction, demolition, acquisition) on a 1 to 4 family dwelling; or individual action on five or more units scattered on sites more than 2000 feet apart and no more than 4 units per site.</p> <p>Acquisition (including leasing) or disposition of, or equity loans on an existing structure or acquisition (including leasing) of vacant land provided that the structure or land acquired or disposed of will be retained for the same use.</p> <p>Combinations of the above activities</p>	<p>Activities not exempt or categorically excluded under §58.34 and §58.35</p> <p>It is usually new construction of five (5) or more homes, and conversion from one type of land use to another.</p>

Environmental Assessment

- Use current forms on DCA Website
- Cite Authoritative Sources of Info
 - See HUD tool
(<https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities>)
- Describe mitigation measure for any identified negative impacts
- Evaluate all alternatives
- Certifying Officer must sign FONSI

Request for Release of Funds and Certification

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

OMB No. 2506-0087
OMB No. 2506-0087
(exp. 08/31/2023)

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Part 1

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s)	2. HUD/State Identification Number Grant # or Pending	3. Recipient Identification Number (optional)
4. OMB Catalog Number(s) 14.219 for CDBG	5. Name and address of responsible entity	
6. For information about this request, contact (name & phone number)		
8. HUD or State Agency and office unit to receive request	7. Name and address of recipient (if different than responsible entity)	
The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following		
9. Program Activity(ies)/Project Name(s)	10. Location (Street address, city, county, State)	

11. Program Activity/Project Description

HUD auditors want enough description to be able to understand the basics of the project here. They do not need generic information about what CDBG is, they work for HUD.

Give us a few sentence summary of the project, not just a list of the activities. As an example, if it is a water project, we need to know why pipes are being replaced. Is it for drinking water, or fire protection or something else?

The description should include where work is being done, street names, neighborhood name, or similar. How many people are being helped? Add other details if it will help understand the project.

Tiered Reviews

- Used when the addresses are unknown at the time of award
- Tier 1 (Broad Level) Environmental Reviews:
 - Includes Public Notice and RROF
 - Clear as many of the statutes as possible without knowing the addresses
 - Ex: Airport Hazard, Coastal, etc..
- Tier 2 (Site Specific) Environmental Reviews
 - Use once addresses are know
 - Checklist includes only remaining statutes
 - Ex: Floodplain, Historic Preservation, etc.

Environmental Impact Statement (EIS)

- Most CDBG projects do not trigger
- Contact DCA immediately for assistance

Compliance Factors

- Air Quality
- Airport Hazards
- Coastal Barrier Resources
- Coastal Zone Management
- Endangered Species
- Explosives and Flammable Facilities
- Farmlands Protection
- Flood Insurance
- Floodplain Management
- Historic Preservation (includes Tribal consultation)
- Noise Abatement and Control
- Site Contamination
- Sole Source Aquifers
- Wetlands Protection
- Wild and Scenic Rivers
- Environmental Justice

Compliance Factor Documentation

- HUD's Laws and Authorities Web Page
<https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/>
- We advise you to use the partner worksheets from HUD
- Each factor must have documentation, including the items like Sole Source Aquifers that do not apply to Georgia
- A map or report from a qualified expert or the appropriate government agency is the most common documentation
- Fish and Wildlife online Endangered Species tool:
<https://ecos.fws.gov/ipac/>

HUD Worksheets

- HUD entitlements are now required to use the: HUD Environmental Review Online System (HEROS)
- States are not on the system, but they provide worksheets that mirror the HEROS system at:
<https://www.hudexchange.info/programs/environmental-review/federal-related-laws-and-authorities/>
- Under each category there is a Worksheet for the topic. Two sheets, one for reviews completed by the recipient and a Partner Worksheet if completed by a third party (grant administrator).
- DCA strongly advises making these worksheets part of your Environmental Review Record – they might be required in the future

Environmental Notices – Local Comment Period

- Publish in local newspaper of general circulation.
 - Legal or non-legal section
- Notice of Intent to Request Release of Funds (NOI): 7 days
- FONSI and NOI (Concurrent Notice): 15 days
- Notice includes an additional 15 days for public objection of RROF to DCA.
 - Begins the day after DCA receives the RROF.

Waiting Period Details

- All Waiting period days must be full 24 hour periods
- The day of publication DOES NOT COUNT toward the waiting period
- The DCA public comment period does not start until the day after receipt of the RROF
- Each part of the process must be separate, no overlapping days

Example Fastest Concurrent Notice and RROF

- Day1: Concurrent Notice Published
- Day 2-16: 15 day comment period
- Day 17: RROF signed and dated by certifying official, emailed to and received by DCA. DCA comment period does not start on the day we receive it.
- Day 18-32: State 15 day comment period
- Day 33: RROF letter prepared by DCA
- Weekends and any delay usually increases this by a few days
- If you have the time, allow for slightly more than 15 days. If you use the minimum and the newspaper runs it a day late you will have to re-publish.

Local Period – Objections

- Basis for Objections
 - Anything
- Local Government must consider comments
 - If you get a comment you must respond
 - Acknowledge and respond in writing
- Tell DCA about any comments and include your response

Items to send when Requesting Release of Funds

- ☐ RRROF Form, or similar for other level of review
 - ☐ If it is not a full Environmental Assessment, do not send the Environmental Assessment form. The form for that level of review replaces it.
 - ☐ HUD wants an actual description not just the budget line item
 - ☐ Make sure to select the appropriate EIS check box on page 2
 - ☐ Must be signed and dated after the end of the public comment period
- ☐ All Newspaper Notices (Concurrent in most cases, and Floodplain/Wetlands if necessary) – Scans or actual notices, make sure the date of the paper (not just in the notice) is visible.
- ☐ HPD clearance letter unless it is not subject to 58.5
- ☐ Proof of Tribal Consultation signed by a certifying officer of the local government if subject to 58.5 and the activity requires it.
- ☐ If you received an objection or comment, include it and your response.

Required Items for your Application

- ❑ Applicant forms listed in the manual and available on our web site:
 - ❑ DCA 9 Environmental Review Information
 - ❑ DCA 9A Historic Preservation Environmental Review Form
 - ❑ DCA 9B When to Consult With Tribes Under Section 106
 - ❑ Proof of tribal consultation Generally this should be a scan of the letters, any responses, and a memo letting us know that the others did not respond during the review period.
 - ❑ Letters should be signed by the Chief Local Official, or if he can not because of a conflict of interest or some other reason, by the next highest certifying official.
- ❑ Floodplain and Wetland Maps
- ❑ Any other environmental review paperwork from stages that are complete when submitted.

Environmental Review Optional Advice for RROFs

- A memo listing items sent in with the RROF and items previously sent to DCA will make it faster and easier to review. Without this, if some items are in the application we probably won't know until you tell us.
- If you are an experienced administrator, grouping paperwork with the RROF instead of each item separately will make it easier for anything that is not bonus point related.
- For new administrators feel free to call or email me to make sure time periods are good.

Objections to DCA

- Basis for Objections
 - RROF not signed by Certifying Officer
 - Omission of a required decision, finding, or step applicable to the environmental process
 - Committed funds prior to release of funds

Important Tips

- Change of scope in project (Grant Amendments) might require additional review.
- DON'T SPEND A DIME – until your ER is complete and you have received Release of Funds from DCA
 - Exception for Admin and Design Costs
- When in doubt – contact DCA/CDBG staff!

Current Issues

- Everything must be complete, including the response from Historic Preservation before you publish the FONSI/Concurrent Notice
- The Environmental Review lasts 5 years from release date. If construction is still happening you have to stop and perform a completely new review
- Any Historic Preservation condition stops a conversion to Exempt
- Incidental Floodplain and Wetlands – Do 8 Step, or Deed Restrict
- Tribal Consultation should be Government to Government, Signed by CEO
- Hazardous Waste: Check 300' radius. Phase one last 1 year, 180 days to 1 year an update is required

Application Requirements & Bonus Points

- Tribal Consultation must be completed by the Application Deadline of June 3, 2022
- If you complete the process and have a Release of Funds by July 1, 2022 your application will receive 5 bonus points

Resources

- <https://www.hudexchange.info/environmental-review/orientation-to-environmental-reviews/>
- <https://egis.hud.gov/tdat/>
- <https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities/>
- <https://www.hudexchange.info/resource/4707/environmental-review-record-related-federal-laws-and-authorities-worksheets/>
- <http://www.dca.ga.gov/communities/CDBG/programs/CDBGforms.asp>
- <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>

Contact Information

- Kathleen Vaughn
404.679.0594
kathleen.vaughn@dca.ga.gov
- Rob Shaw
404.679.4806
rob.shaw@dca.ga.gov

Up Next...

Uniform Relocation Assistance and Real Property Acquisition Act Overview

Glenn Misner

Director, Office of Neighborhood Stabilization Program



The Uniform Relocation Assistance and Real Property Acquisition Policies Act

Acquisition

“The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970”

To provide uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects

To ensure relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement

Acquisition

To ensure that no individual or family is displaced unless decent, safe, and sanitary (DSS) housing is available within the displaced person's financial means

To help improve the housing conditions of displaced persons living in substandard housing

To encourage and expedite acquisition by agreement and without coercion

Acquisition

The following process DOES NOT include acquisition that will result in **DISPLACEMENT** of “bona fide” residents of the property

RELOCATION of displaced persons is required in those circumstances

Acquisition

“The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970” – URA

- ❑ [49 CFR Part 24](#) is the government-wide regulation that implements the URA.
- ❑ [HUD Handbook 1378](#) provides HUD policy and guidance on implementing the URA and 49 CFR Part 24 for HUD funded programs and projects.
 - Section 104(d) of the Housing and Community Development Act

Required regardless of source of funds used to Acquire real property

5 BASIC STEPS TO ACQUISITION

1. NOTIFY property owner of intent to acquire property
2. NOTIFY property owner & tenants of their “URA Protections”
3. DETERMINE “Just Compensation” (FMV)
4. OFFER Just Compensation
5. COMPLETE sale as expeditiously as possible

Step 1. Notify Property Owner of Intent to Acquire Property

- ❑ This is a PRELIMINARY acquisition notice
General Information Notice (GIN)
- ❑ “Notice of Interest” or “Notice of Intent to Acquire”
- ❑ Sample letter available upon request

Step 2. Notify Property Owner & Tenants of their URA Protections

- ❑ Essential: Send/deliver the HUD Brochure with the Notice of Intent (see Step 1) **Document Delivery of Notice**
- ❑ “When a Public Agency Acquires your Property”
- ❑ Brochure can be found at the following site:
<https://www.hudexchange.info/programs/relocation/publications/>

Step 3. Determine “Just Compensation”

- ❑ Just Compensation = Fair Market Value (FMV)
- ❑ Requires Appraisal and a Review Appraisal
 - ❑ Unless...simple acquisition < \$10,000.00
- ❑ Qualifications for appraisers may be found in the URA regulation

Step 3. “Just Compensation” (cont.)

For simple acquisitions < \$10,000: “Waiver Valuation”

- ❑ Appropriate valuation methodology must be used (tax records, for example)
- ❑ Valuation must be conducted by a person that has sufficient understanding of appraisal principles and the local real estate market to be qualified to prepare it.
- ❑ Owner still has right to appraisal

Step 3. “Just Compensation” (cont.)

For Property Donations:

- ❑ Owner must be informed of appraisal & just compensation rights (\$)
- ❑ Waiver must be provided by owner in writing (use HUD Form)

Step 4: Offer Just Compensation

- ❑ “Notice of Just Compensation and Summary Statement”
- ❑ This is a written purchase offer
- ❑ Must summarize basis for the offer, including...
 - i. Property Description
 - ii. ID of any building, equipment & fixtures included

Step 5: Complete Sale ASAP

- ❑ Consider community meeting if large # of easements or ROW's are needed
- ❑ Consider “Face-to-Face” contact
- ❑ Local Government must consider owner's viewpoints & may update appraisal as a result
- ❑ All property transfer costs must be paid by the program
- ❑ Deed must be filed at courthouse

DCA will monitor your files for...

- ☐ List of acquired properties
- ☐ Evidence that all notices were provided
- ☐ Copies of any waivers
- ☐ Copy of appraisal & review appraisal
 - ☐ Or method of valuation for <\$10,000
- ☐ Property Description
- ☐ Closing or settlement statement
- ☐ Evidence of payment
- ☐ Evidence of property transfer & copy of recorded deed

Web Resources

- ❑ https://www.fhwa.dot.gov/real_estate/uniform_act/index.cfm
- ❑ <https://www.hudexchange.info/programs/relocation/publications/> (“When a Public Agency Acquires Your Property” Brochure)

Questions??

Glenn Misner(404) 679-3138

glenn.misner@dca.ga.gov

Thank You!

Glenn Misner(404) 679-3138

glenn.misner@dca.ga.gov

TIME FOR
LUNCH



Up Next...

Section 106 Requirements

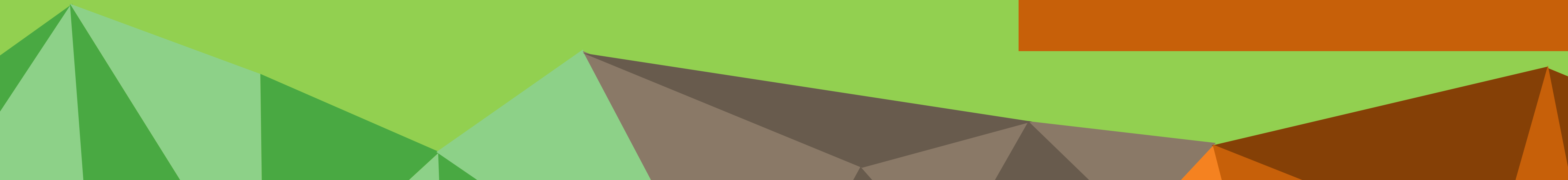
Stacy Rieke, Environmental Review Historian

DCA – Historic Preservation Division

stacy.rieke@dca.ga.gov



Historic Preservation / Section 106 Review



HPD's MISSION STATEMENT

To promote the
preservation
and **use** of historic
places for
a better Georgia



HPD PROGRAMS

Federal Programs

- National Register of Historic Places
- Environmental Review
- Tax Incentives and Grants
- Certified Local Governments

State Programs

- Georgia Register of Historic Places
- Tax Incentives and Grants
- Historic Resources Survey
- Archaeology
- Centennial Farm Program
- African American Preservation Network & Program



HISTORIC PRESERVATION

So, what's the CONNECTION between MY PROJECT and HISTORIC PRESERVATION and a SECTION 106 REVIEW?

Why Preserve the Historic?

- A Community's Culture and Identity are Important
- A Sense of History – the Story of a Community – is Important
- Economic Vitality is Important
- Adaptability is Important
- Sustainability and the Environment are Important

And WHY is a Section 106 Review Required?

The bottom of the slide features a decorative border composed of several overlapping triangles in various shades of green, brown, and orange, creating a modern, abstract landscape effect.

NATIONAL HISTORIC PRESERVATION ACT

- State Historic Preservation Offices
- Advisory Council on Historic Preservation
- National Register of Historic Places
- Section 106



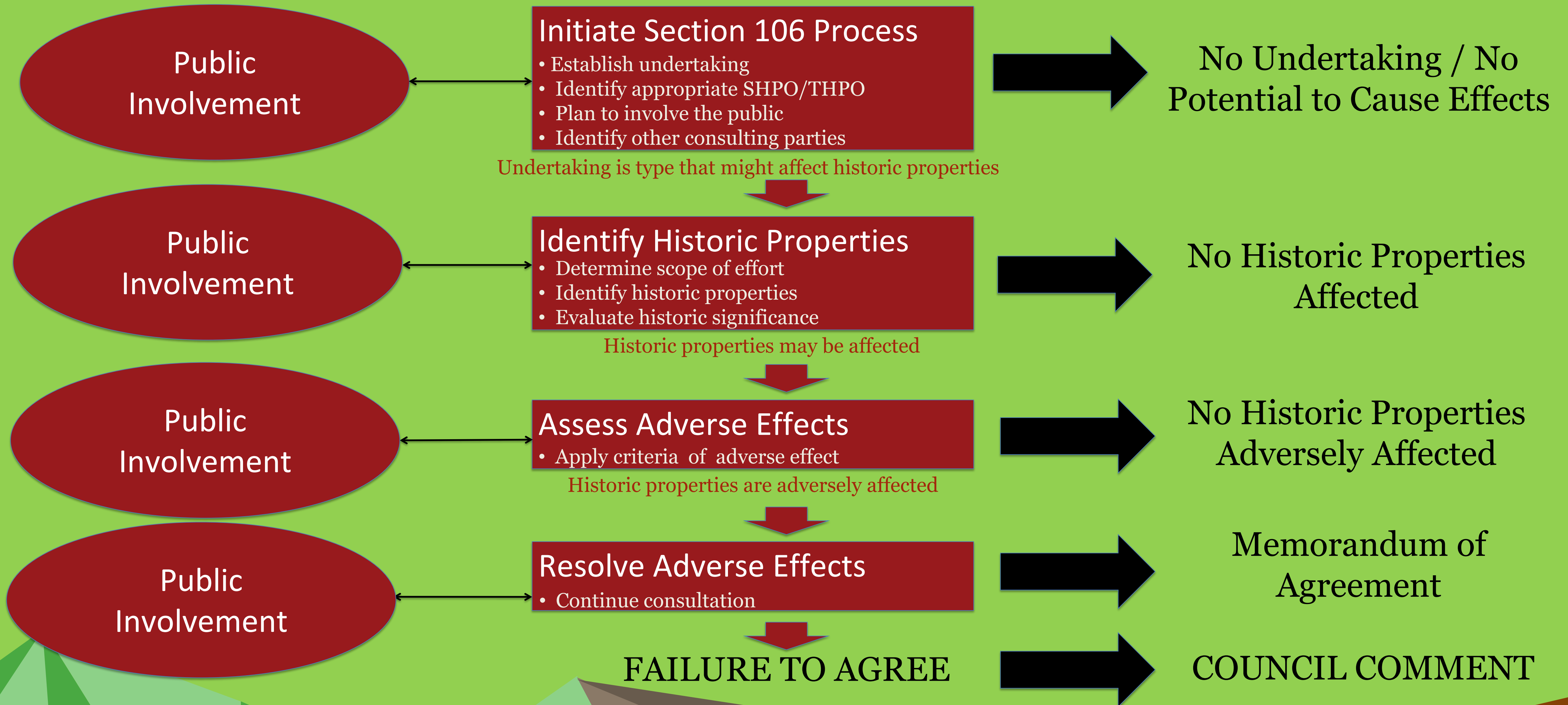
PROJECT TYPES

- Water/sewer projects
- Bank branches
- Docks
- Highway/road projects



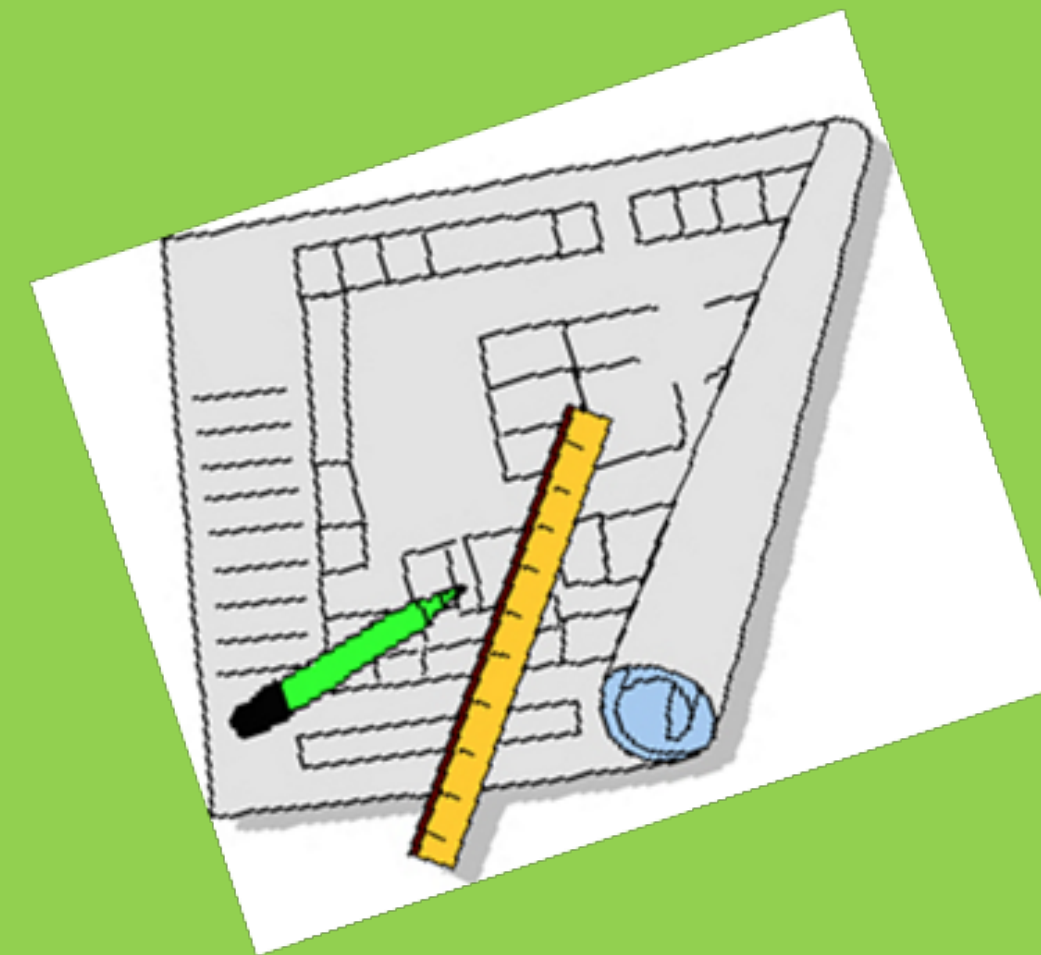
- Public housing
- Transmission lines
- Military installations
- Pipelines

S106 PROCESS STEPS



CONSULTATION WITH HPD

- Environmental Review Form
- Project information
- Map
- Photographs



ENVIRONMENTAL REVIEW FORM

The ER Form helps you explain your project to HPD

Georgia Historic Preservation Division Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.

PLEASE NOTE: THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL. SHOULD ADDITIONAL INFORMATION BE REQUESTED, THE 30-DAY PERIOD RESTARTS.

I. General Information

A. Project Name: _____

Project Address: _____

City: _____ County: _____

B. Federal Agency Involved: _____

State Agency (if applicable): _____

C. Agency's Involvement:

☐ Funding ☐ Unknown
☐ License/Permit ☐ Other, please explain: _____
☐ Direct/Is performing the action

D. Type of Review Requested:

☐ Section 106 of the National Historic Preservation Act (Federal involvement)
☐ Section 110 of the National Historic Preservation Act (Federally owned properties)
☐ Georgia Environmental Policy Act (State involvement)
☐ State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)
☐ Technical Assistance (No Federal or State involvement)
☐ Unknown

E. Contact Information: ☐ Applicant ☐ Consultant

Name/Title/Company: _____

Address: _____

City/State/Zip: _____

Phone: _____ Email: _____

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: _____

Address: _____

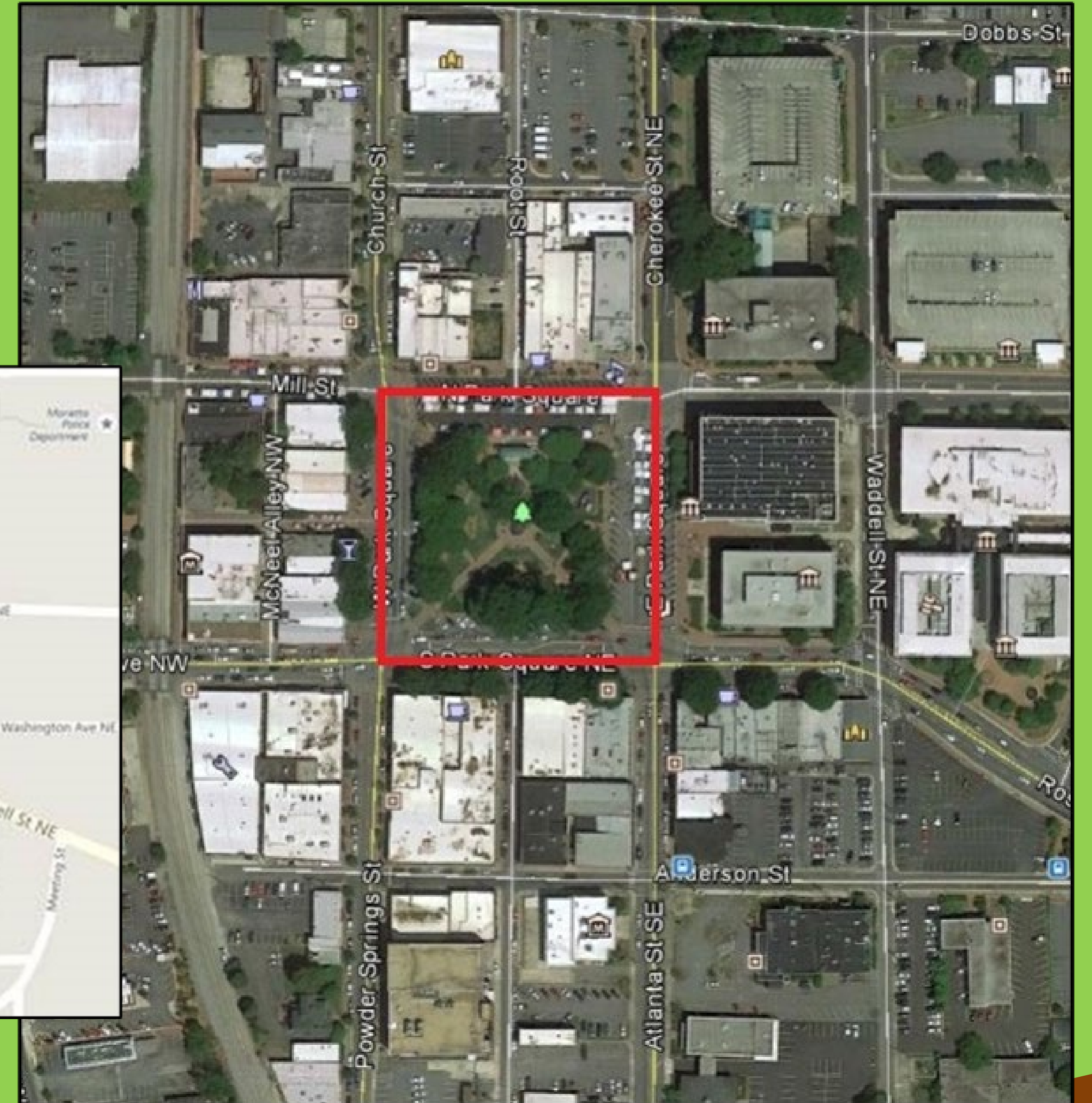
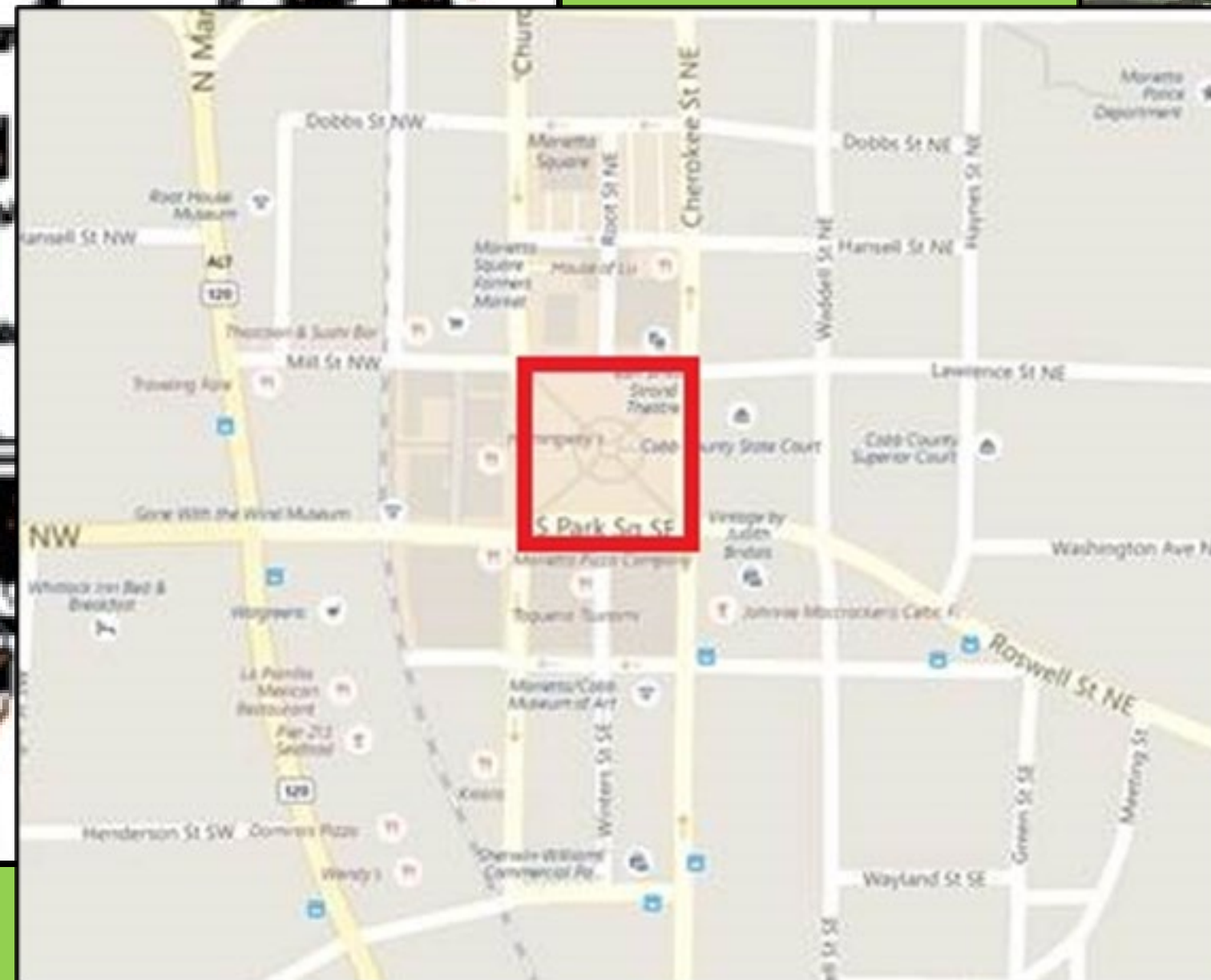
City/State/Zip: _____

Phone: _____ Email: _____

- The review period for a project is a MAX of 30-days:
 - *Be warned: the clock restarts if additional information is needed*
- A Completed Form will Provide HPD with:
 - *Basic project information*
 - *Details about your project site*
 - *Details about what historic resources are nearby*
 - *Details about the effect your project will have on any nearby historic resources*
- The more details you provide, the fewer questions HPD will need to ask about your project!

Email to: **ER@dca.ga.gov**

SUPPORTING DOCUMENTS - MAPS



SUPPORTING DOCUMENTS - PHOTOS



THE REVIEW PROCESS

- The applicant emails the project to HPD
- HPD reviews the project within 30-days of receiving it
- HPD responds to the applicant with a letter/memo on or by the end of the 30-day review period
- Is that all?



ADVERSE EFFECTS

An Adverse Effect Defined:

When an undertaking “may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.”

36 CFR Part 800.5

An **Adverse Effect** is **not** the end of the process!

An **Adverse Effect** does **not** mean the project cannot be completed!



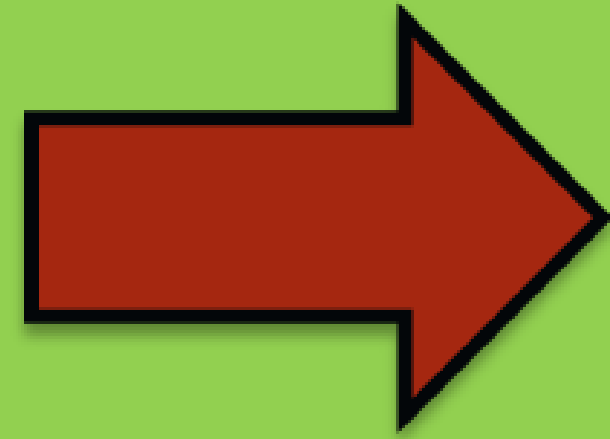
WHAT CAUSES AN ADVERSE EFFECT?

- Introduction of incompatible visual or atmospheric elements
- Change in use, character, or setting
- Destruction or damage
- Neglect
- And more....

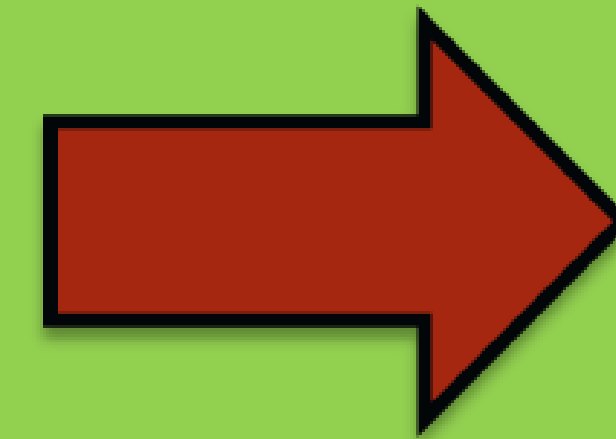


RESOLVING AN ADVERSE EFFECT

Avoid



Minimize



Mitigate



NOTIFY ACHP OF ADVERSE EFFECTS

<https://www.achp.gov/e106-email-form>

- Items to include when contacting the ACHP:
 - Background Info
 - Photos, Maps, and Drawings
 - Adverse Effect
 - Correspondence
 - MOA Draft

ACHP staff contact information can be found at:

<https://www.achp.gov/about/staff>



ACHP Notification is ONLY required if an adverse effect is determined.

MEMORANDUM OF AGREEMENT

ONLY required if an adverse effect is determined

- Formalizes mitigation measures
- Assigns responsibilities
- **LEGALLY BINDING**



MOAs Include:

- Whereas Clauses (preamble)
- Stipulations (mitigation)
- Stipulations (administrative)
- Conclusion
- Signatures

FINAL POINTS TO REMEMBER

- Cold Reader
- Sufficient Documentation
- Clear/Color Photos and Maps
- Site Plans and Elevations
- Adverse Effect is NOT the end, does NOT stop a project
- HPD is here to help!



<https://www.dca.ga.gov/georgia-historic-preservation-division>

Stacy Rieke
Environmental Review Historian

Stacy.Rieke@dca.ga.gov
(404) 486-6434

60 Executive Park South, NE
Atlanta, Georgia 30329

The bottom of the slide features a decorative border composed of several overlapping triangles in various shades of green, brown, and orange, creating a stylized mountain or landscape effect.

Up Next...

Comprehensive Plan and Service Delivery Strategy Requirements

Jon West, Director

DCA – Office of Planning, Research
and Mapping

jon.west@dca.ga.gov

Juli Yoder, Principal Planner

DCA – Office of Planning and Research

juli.yoder@dca.ga.gov



The Service Delivery Strategy (SDS): *Compliance and Consistency for CDBG Applications*



11 January 2022

Juli Yoder, A.I.C.P. | DCA



INTERGOVERNMENTAL COORDINATION (SDS)

Regulatory Framework



□ Service Delivery Act

- No state-administered benefit to be issued to any local government or authority without a DCA-verified SDS...
- Or, for any project that is inconsistent with the SDS

SDS: *What are we looking for?*

An SDS is the local governments' agreement as to:

- ❑ Which local governments (or authorities) will provide
- ❑ Which services
- ❑ To which specified areas within a county, and
- ❑ How provision of such services will be funded.

→ *Who provides what to where, and how.*

SDS: *What are we looking for?*

FIRST, An SDS should reflect SERVICES not PROJECTS.

This	Not that
Fire Services	Fire Station 3
Water Treatment & Distribution	New Water Tower
Youth Development	Boys & Girls Club Building
Emergency/Transitional Housing	Homeless Shelter
Wastewater Treatment	Sewer Lines

SDS: *What are we looking for?*

□ Is the applicant included as a service provider in the SDS?

□ Form 1, Box II

II. LOCAL GOVERNMENTS INCLUDED IN THE SERVICE DELIVERY STRATEGY:

In this section, list all local governments (including cities located partially within the county) and authorities that provide services included in the service delivery strategy.

List ALL Local Governments and ALL Authorities Here

- ALL Governments (including parts of border-straddlers) **and ALL Authorities** (even if HQ'd elsewhere) that provide service in the territory
- These are the entities the Local Governments have authorized to provide service. NOT listing authorized providers, here, makes it difficult or impossible to for them to secure state-administered financial assistance under § 36-70-27.

SDS: *What are we looking for?*

- Is the service included in the SDS?
 - Form 1, Box III or IV

III. SERVICES INCLUDED IN THE EXISTING SERVICE DELIVERY STRATEGY THAT ARE BEING EXTENDED WITHOUT CHANGE:

In this section, list each service or service component already included in the existing SDS which will continue as previously agreed with no need for modification.

List ALL Services Being Extended Here

IV. SERVICES THAT ARE BEING REVISED OR ADDED IN THIS SUBMITTAL:

In this section, list each new service or new service component which is being added and each service or service component which is being revised in this submittal. For each item listed here, a separate Summary of Service Delivery Arrangements form (FORM 2) must be completed.

List ALL Services being Revised or Added Here

If YES, we look for the most recent Form 2 for that service.

SDS: *What are we looking for?*

- Are they listed as an authorized provider of the appropriate service and for the appropriate territory? Form 2, Question 1

1. Check the box that best describes the agreed upon delivery arrangement for this service:

☐ Service will be provided countywide (i.e., including all cities and unincorporated areas) by a single service provider. (If this box is checked, identify the government, authority or organization providing the service.): **Type Name of Government, Authority or Organization Here**

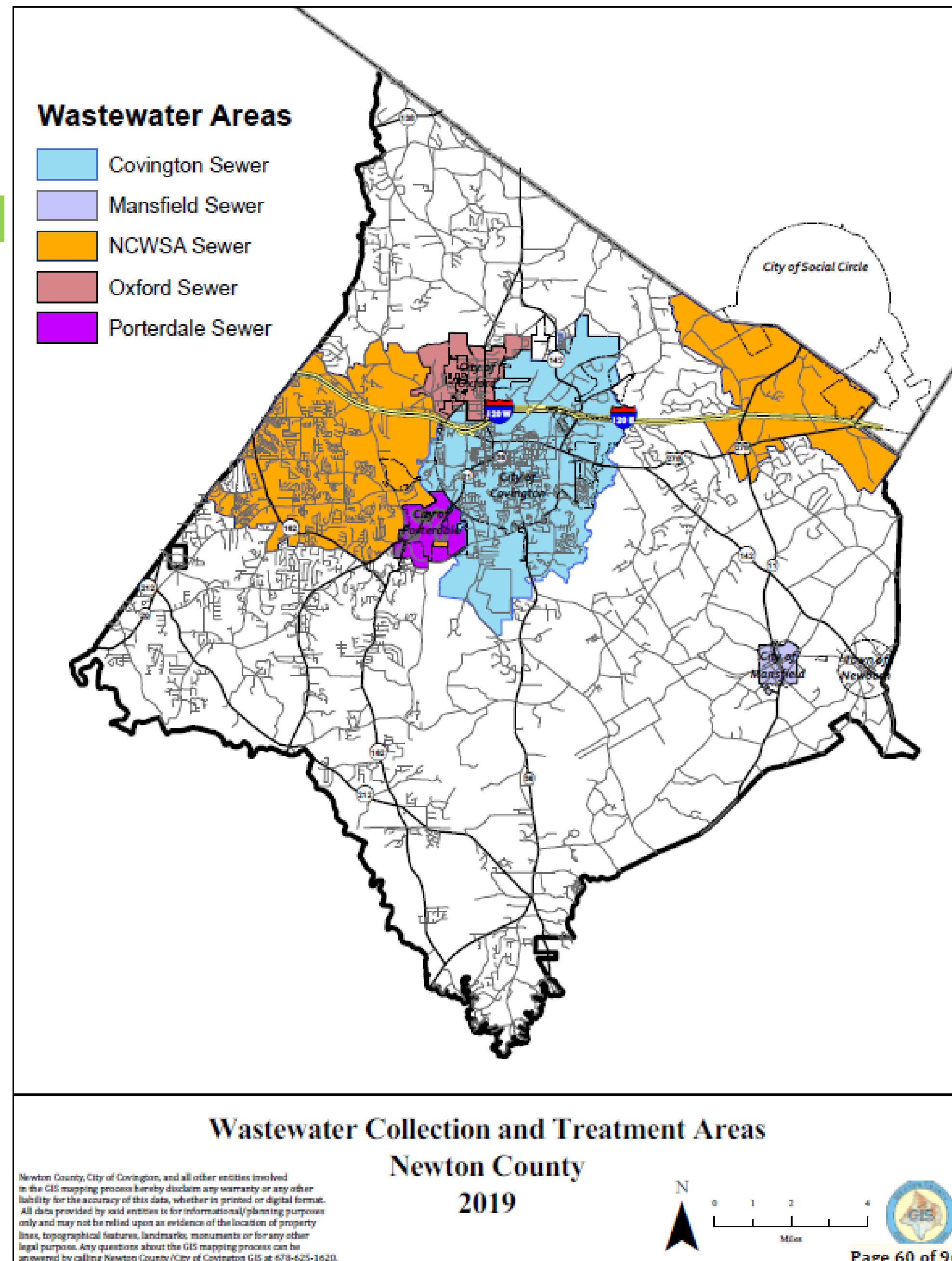
☐ Service will be provided only in the unincorporated portion of the county by a single service provider. (If this box is checked, identify the government, authority or organization providing the service.): **Type Name of Government, Authority or Organization Here**

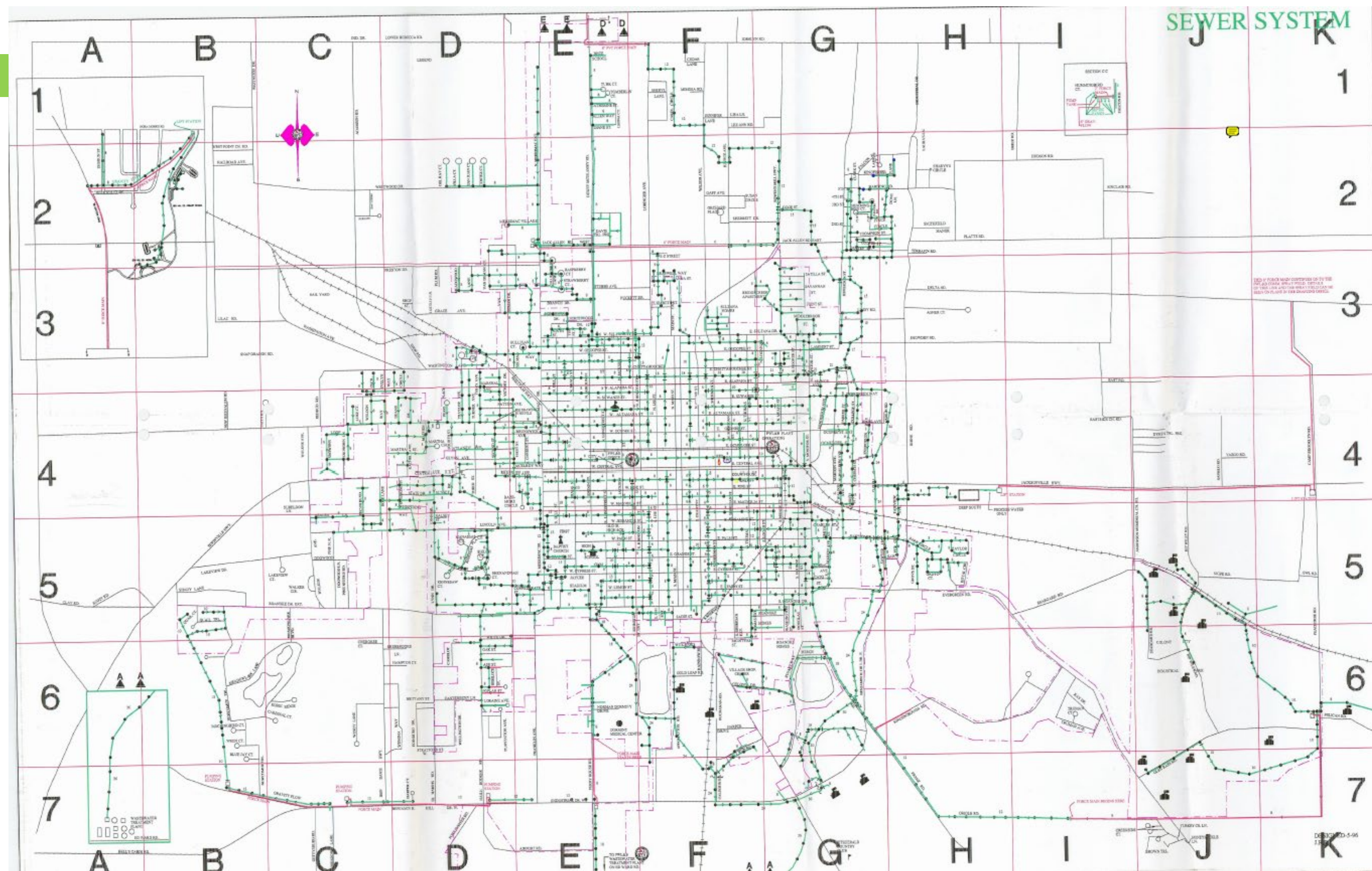
☐ One or more cities will provide this service only within their incorporated boundaries, and the service will not be provided in unincorporated areas. (If this box is checked, identify the government(s), authority or organization providing the service: **Type Name of Government, Authority or Organization Here**

☐ One or more cities will provide this service only within their incorporated boundaries, and the county will provide the service in unincorporated areas. (If this box is checked, identify the government(s), authority or organization providing the service.): **Type Name of Government, Authority or Organization Here**

☐ Other (If this box is checked, attach a legible map delineating the service area of each service provider, and identify the government, authority, or other organization that will provide service within each service area.): **Type Name of Government, Authority or Organization Here**

Good Service Area Map





Unacceptable
Service Area
Map

SDS: *What are we looking for?*

- Is CDBG (i.e., “grants”) an authorized funding source? Form 2, Question 3

SDS FORM 2, continued

3. List each government or authority that will help to pay for this service and indicate how the service will be funded (e.g., enterprise funds, user fees, general funds, special service district revenues, hotel/motel taxes, franchise taxes, impact fees, bonded indebtedness, etc.).

[illegible]

SDS: *What are we looking for?*

- If you're amending the SDS to allow for your CDBG application, do you have all the correct signatures? Form 4.

FORM 4: Certifications

Instructions:

This form must, at a minimum, be signed by an authorized representative of the following governments: 1) the county; 2) the city serving as the county seat; 3) all cities having a 2000 population of over 9,000 residing within the county; and 4) no less than 50% of all other cities with a 2000 population of between 500 and 9,000 residing within the county. Cities with a 2000 population below 500 and local authorities providing services under the strategy are not required to sign this form, but are encouraged to do so.

- Must be signed by
 - The County
 - County Seat
 - Municipalities with $\geq 9,000$ residents within the county
 - $\geq 50\%$ of the Municipalities with 500-9,000 residents in the county
- Smaller municipalities are encouraged to sign the form—many do. The Act requires that delivery of services to their territory be addressed and that they be included in the process. But, the Act prevents communities that are likely to have a negligible impact on overall service delivery from obstructing the process by withholding their signatures.
- Directors of Authorities also encouraged to sign—few do. Not required.

SDS: *What are we looking for?*

- ❑ If you're amending the SDS to allow for your CDBG application, are the executions complete and acceptable?

JURISDICTION	TITLE	NAME	SIGNATURE	DATE
<u>LIST EACH JURISDICTION HERE, ALPHABETICALLY</u>	List the Title of the Authorized Representative of Each Jurisdiction Here, Respectively	List the Names of the Representatives Here, Respectively		

- ❑ EACH column must be completed.
- ❑ Missing dates are VERY frequent reason for requesting revisions.
- ❑ Signature must belong to the actual CHIEF ELECTED OFFICIAL.
 - Mayors *Pro Tempore* are unacceptable unless actual mayor is permanently unavailable (deceased, disqualified/removed from office, etc.).
 - Staff with signature authority are unacceptable. Copy/paste signatures are unacceptable

SDS: Deadlines and Review Times

- 3 Trimester Deadlines
 - Once submitted to DCA, 30 days are allowed for review
 - The SDS must be verified by DCA before the deadline
- June 3rd, 2022 deadline for CDBG eligibility
 - 60-Day “Cure Period” to resolve any noncompliance

SDS: Deadlines and Review Times

SERVICE DELIVERY STRATEGY

FORM 5: Certifications for Extension of Existing SDS

Instructions: This two page form must, at a minimum, be signed by an authorized representative of the following governments: 1) the county; 2) the city serving as the county seat; 3) all cities having a 2010 population of over 9,000 residing within the county; and 4) no less than 50% of all other cities with a 2010 population of between 500 and 9,000 residing within the county. Cities with a 2010 population below 500 and local authorities providing services under the strategy are not required to sign this form, but are encouraged to do so.

If the strategy for providing **ANY** local service is being revised, FORM 5 CANNOT be used. When revisions are necessary, a submittal MUST include updates to FORM 1, FORM 2, and FORM 4 that cover ALL local services.

COUNTY: TYPE COUNTY NAME HERE

We, the undersigned authorized representatives of the jurisdictions listed below, certify that:

1. We have reviewed our existing Service Delivery Strategy (SDS) and have determined that it continues to accurately reflect our preferred arrangements for providing **ALL** local services throughout our county and no changes in our Strategy are needed at this time. We authorize its extension until:

Select 1 box, below

☐ February 28,

☐ June 30,

☐ October 31,

Type End-Year Below

YEAR

Extensions

SDS FORM 5, continued				
JURISDICTION	TITLE	NAME	SIGNATURE	DATE
LIST EACH JURISDICTION HERE, ALPHABETICALLY	List the Title of the Authorized Representative of Each Jurisdiction Here, Respectively	List the Names of the Representatives Here, Respectively		

Up Next...

State Survey Requirements

Jackson Lilly

Research and Data Analyst

Jackson.lilly@dca.ga.gov





CDBG Applicant Workshop

State Survey Requirements

January 11, 2022



Agenda

- Government Management Indicators (GOMI) Survey
- Report of Local Government Finance (RLGF)
- Other Research Functions/Submissions
- Why We Collect It
- Checking Compliance



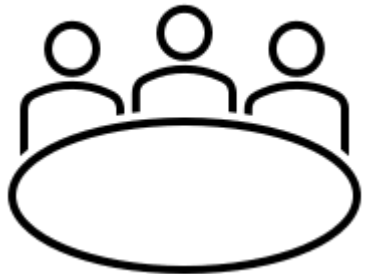
Government Management Indicators Survey (GOMI)



Government Management Indicators (GOMI)

- Survey to collect data on local government operations.
- Nine sections on almost every aspect of local government.
- Each section has about 10-15 questions on the structure and depth of each function.

<input checked="" type="checkbox"/>	Section I	Management Functions
<input checked="" type="checkbox"/>	Section II	Services Provided
<input checked="" type="checkbox"/>	Section III	Public Facilities
<input checked="" type="checkbox"/>	Section IV	Planning, Zoning, and Development Procedures
<input checked="" type="checkbox"/>	Section V	Financial Management Practices
<input checked="" type="checkbox"/>	Section VI	Economic Development Activities
<input checked="" type="checkbox"/>	Section VII	Public Safety
<input checked="" type="checkbox"/>	Section VIII	Form of Government
<input checked="" type="checkbox"/>	Section IX	E-Government
<input checked="" type="checkbox"/>	Certification	Certification
	Log Out	



- | | |
|----------|---|
| A | - Your government directly |
| B | - Agreement with other local government or governments which may include city governments, county governments and/or a local government authority |
| C | - Agreement with Regional Commission (RC) |
| D | - Agreement with private provider |
| E | - Combination of the above methods |
| F | - Function not provided |

Accessing and Completing the GOMI

- Due June 30th for all local governments, regardless of fiscal year end.
- Online survey accessed with your government's CICOID and password.
- Most recent 3 years reports are required for compliance. (2019, 2020 and 2021 for this application cycle)

Local Governments are considered **compliant** with the GOMI Survey filing requirement if the survey has been completed for the most recent three years.

Our records indicate below the survey completion status by your Government for the applicable three years:

2019 Survey Completed:	Yes	Thank you View/Print 2019 Survey
2020 Survey Completed:	Yes	Thank you View/Print 2020 Survey
2021 Survey Completed	No	Click Here to complete the 2021 Survey To assist you, the 2021 Survey will display the information provided on your 2020 Survey

[Log Out](#)

[Print This Page](#)

Questions? Contact DCA.Research@dca.ga.gov.

Tips for Completing the GOMI

- Each year should be pre-populated with last year's responses, but it is good to review all sections before submitting.
- No one person will know all the answers.
- PDFs can be shared with departmental heads, but the final product should all be completed online.

2b. For the majority of the patrol officers, which of the following shift hours are they primarily assigned? (Check only one)

8 hours (708)

9 hours

10 hours

12 hours

Other

2c. Does the police department have a "One Car, One Driver Rule" where each vehicle is the responsibility of one officer?

Yes (709)

No

IF YES:

What is the typical number of firefighters on duty on any shift?

Number (723)


[Print This Page](#)

Report of Local Government Finances (RLGF)



Report of Local Government Finances (RLGF)

- Standardized financial reporting for all local governments in Georgia
- Includes revenue information on taxes, licenses and fees, enterprise funds etc.
- Includes expenditures on general government, judicial, housing and development, etc.
- Based on Uniform Chart of Accounts (UCOA)
- *Not* required to be audited, but audited information is preferred.

	Georgia Department of Community Affairs Office of Research									
Report of Local Government Finances										
COUNTIES, MUNICIPALITIES, AND CONSOLIDATED GOVERNMENTS										
Click on the "Instructions" link regarding report completion: INSTRUCTIONS		For FY2020 or later ONLY (Updated to UCOA 4th Edition)								
Complete the items on ALL SIX bottom tabs. Make entries only in those cells shaded in light blue.		F-16 (GA-2A) (May 2020)								
Please return this form by email to RLGF@dca.ga.gov .										
Send this completed Excel form; do NOT convert this Excel form to any other format, such as PDF, Word, etc.										
PAGE 1	Select name of local government									
IMPORTANT - In the light blue blocks to the right, please indicate the fiscal year covered by this Report.										
Both the month and year are required.										
If the fiscal year end MONTH selected on this report is different from the fiscal year end MONTH on the previous year's report, change the "No" to "Yes" in this block.										
<table><tr><td>No</td><td>Fiscal Year Ended</td></tr><tr><td></td><td>MONTH</td></tr><tr><td></td><td>FYE MONTH IS REQUIRED</td></tr><tr><td>2</td><td>YEAR</td></tr></table>			No	Fiscal Year Ended		MONTH		FYE MONTH IS REQUIRED	2	YEAR
No	Fiscal Year Ended									
	MONTH									
	FYE MONTH IS REQUIRED									
2	YEAR									
If the fiscal period for this Report is for a number of months other than a standard 12 month period, please change the "12" to the appropriate number of months being reported.										
Note: All blue-shaded \$ value blocks on any page of this form MUST show 0 or higher; do NOT leave such										
Part I - TAX REVENUES -- ALL FUNDS		LINK TO: UCOA								
Section A - GENERAL PROPERTY TAXES		UCOA CODE REFERENCE(*)								
Real Property Taxes, Current Year	31.1100									
Real Property Taxes, Current Year -- Public Utility	31.1110	\$0								
Real Property Taxes, Current Year -- Timber Taxes	31.1120	\$0								

Accessing the RLGF Submission Document

- Submitted as Excel document, available on DCA Research website, emailed to rlgf@dca.ga.gov.
- Due within 6-months of the conclusion of your local government's fiscal year end.
- Three most recently completed fiscal years required for eligibility.



FY End Month	Total LGs (689)	RLGF Due Date (or preceding business day)
January	2	July 31
February	2	August 31
March	2	September 30
April	5	October 31
May	3	November 30
June	270	December 31
July	6	January 31 (following calendar year)
August	10	February 28/29 (following calendar year)
September	58	March 31 (following calendar year)
October	3	April 30 (following calendar year)
November	2	May 31 (following calendar year)
December	326	June 30 (following calendar year)

Tips for Completing the RLGF

- Often the report is completed by your auditor and sent directly to DCA.
 - Communicate with them to make sure they are aware of the requirement and deadline
- Covid-19 related extensions have expired and very few circumstances qualify for extensions.
- If unaudited, identify that on the certification section and make updates later.
- Do not unlock or convert the file to any other format.

Part XV - CERTIFICATION		DCA CANNOT ACCEPT the Report unless this section is fully completed prior to submission. ALL blue-shaded spaces MUST be completed. DO NOT TYPE IN ALL CAPS!	
This is to certify that the figures contained in this report are accurate to the best of my knowledge.			
Name of Government		Name of Chief Elected Official	
Title of Chief Elected Official	Date Approved	Report uses AUDITED Figures (Enter Yes or No):	
		NO YES	
Name of Firm Preparing Report (if not Government)		Name of PERSON who Prepared Report	
		Answer Required	
Full Mailing Address of Firm (if not Government)		Preparer's Telephone No.	Preparer's Title
Preparer's Email Address		Email Address for Gov't CFO Contact or CEO	
		Correspondence will be emailed to <---- THIS email address.	
Completion of this report by every chartered local government is mandated by state law. If you have questions about this report, PLEASE CONTACT: RLGF@dca.ga.gov			

Additional DCA Research Functions



Additional DCA Research Functions

- “2022 Schedule of Surveys and Reports” available as PDF download on DCA Website
- Includes exhaustive list of reporting requirements for local governments and authorities, with timelines, contact information, and statutory references
- Direct links to the specific reporting websites/platforms

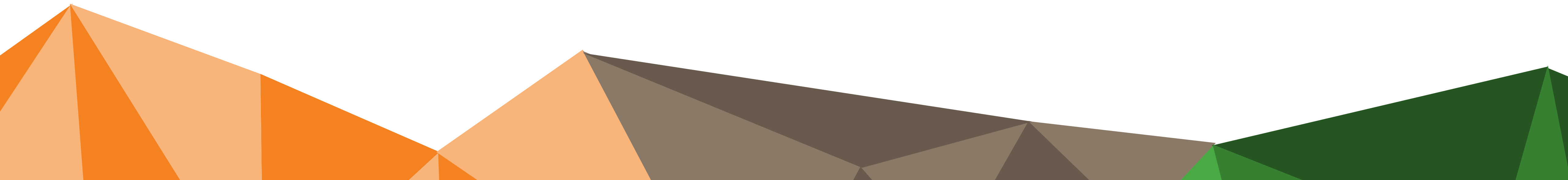
Local Governments Municipal, County, and Consolidated Governments

Report/Survey	O.C.G.A. Reference	Primary DCA Contact Person*	Date Due to DCA
Local Government Contact Information Link to DCA Local Government Officials Contact Update	N/A	DCA.Research@dca.ga.gov	Annual – June 30, 2022
Government Management Indicators Survey (GOMI) Link to GOMI Survey	§ 36-81-8	Norma Allen (404) 679-3132 norma.allen@dca.ga.gov	June 30, 2022
Wage & Salary Survey Link to Wage & Salary Report	N/A (voluntary)	Norma Allen (404) 679-3132 norma.allen@dca.ga.gov	June 30, 2022
Hotel/Motel Tax Report (FY20/FY21) <i>Only required for Local Governments imposing a Local Hotel-Motel Excise Tax</i> Link to Hotel-Motel Tax Report	§ 48-13-56	Jackson Lilly (404) 679-3105 jackson.lilly@dca.ga.gov	Within six (6) months of local government's fiscal year end
Report of Local Government Finances (FY21/FY22) Link to RLGf Documents	§ 36-81-8	Jackson Lilly (404) 679-3105 jackson.lilly@dca.ga.gov	Within six (6) months of local government's fiscal year end
Debt Issuance Report Link to Debt Issuance Documents	§ 36-82-10	Norma Allen (404) 679-3132 norma.allen@dca.ga.gov	Within 60 days of debt issuance (Applies to all debt issues >\$1M)

*Officials needing a local government's CICOID & Password to access reports should email DCA.Research@dca.ga.gov

Additional DCA Research Functions

- *These do not affect your CDBG eligibility*
- Local Government Contact Database
 - Primary source for communications from DCA and other state agencies
 - Updated by LG officials through web-based platform on DCA website using CICOID/Password
 - So, update your information for timely reminders of reports.
- Wage and Salary Survey
 - Optional survey on staffing and salary ranges for ~200 LG positions
- Hotel-Motel Excise Tax Reporting
 - Required within six months of FYE for all jurisdictions collecting a hotel-motel excise tax. (Same schedule as RLGF.)
 - Reports total collections for the fiscal year, as well as use of restricted funds by DMO.
 - Web-based reporting platform requiring CICOID and Password

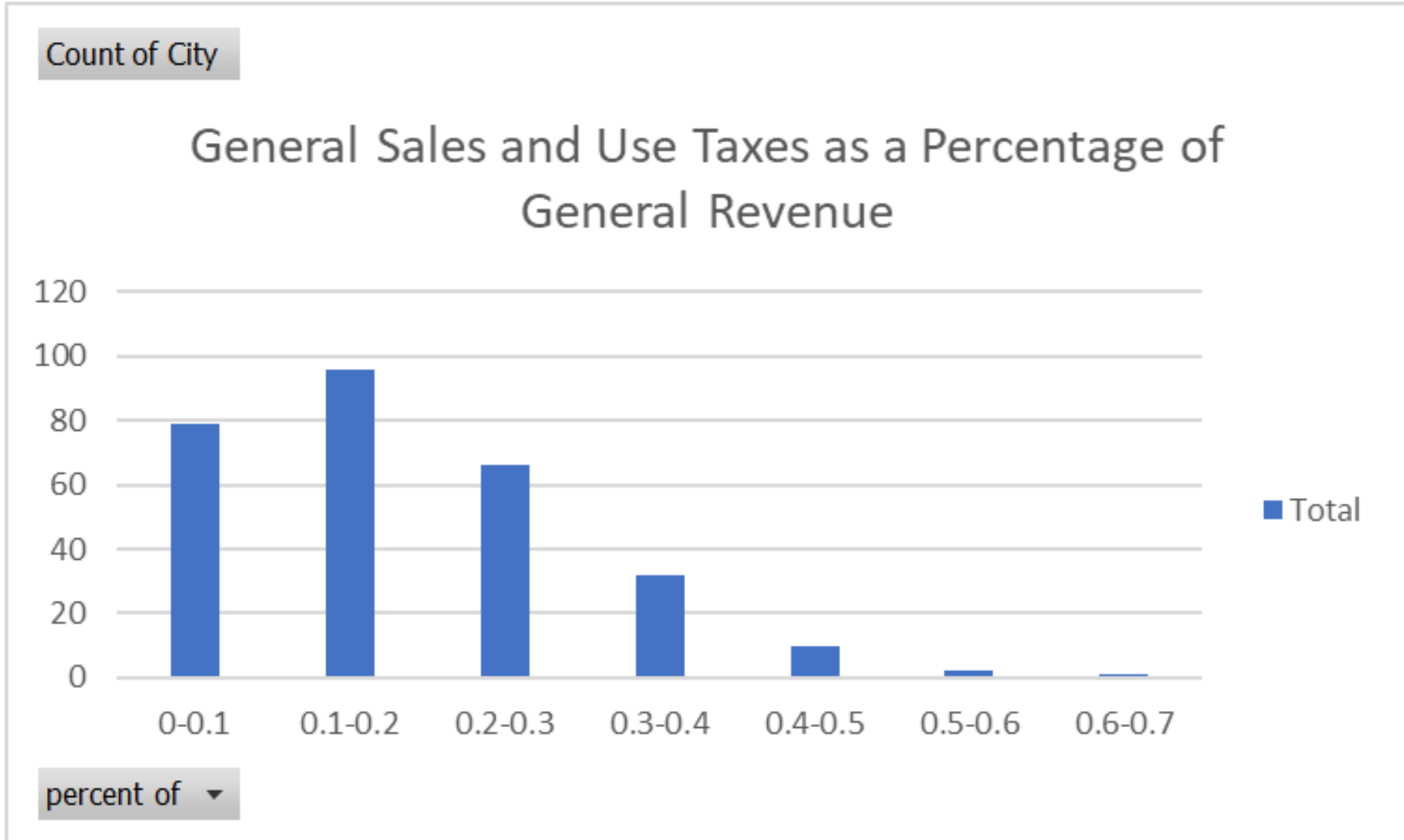


Why we Collect it?



Why we collect it?

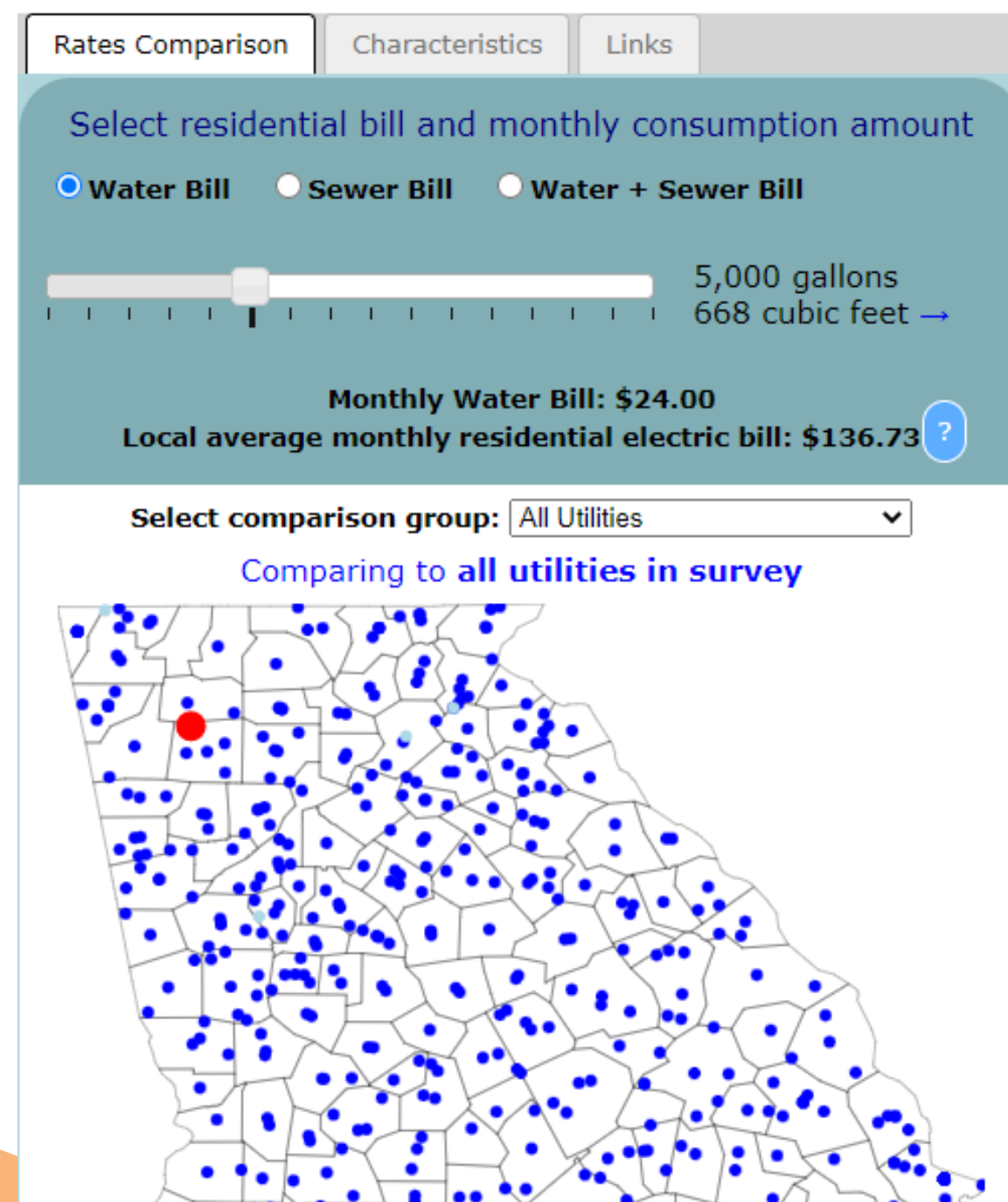
- O.C.G.A. 36-81-8
- Organized to allow for comparative analysis of local governments.
- Used by state and local government policy makers to better understand and evaluate local government operations and service delivery strategies.



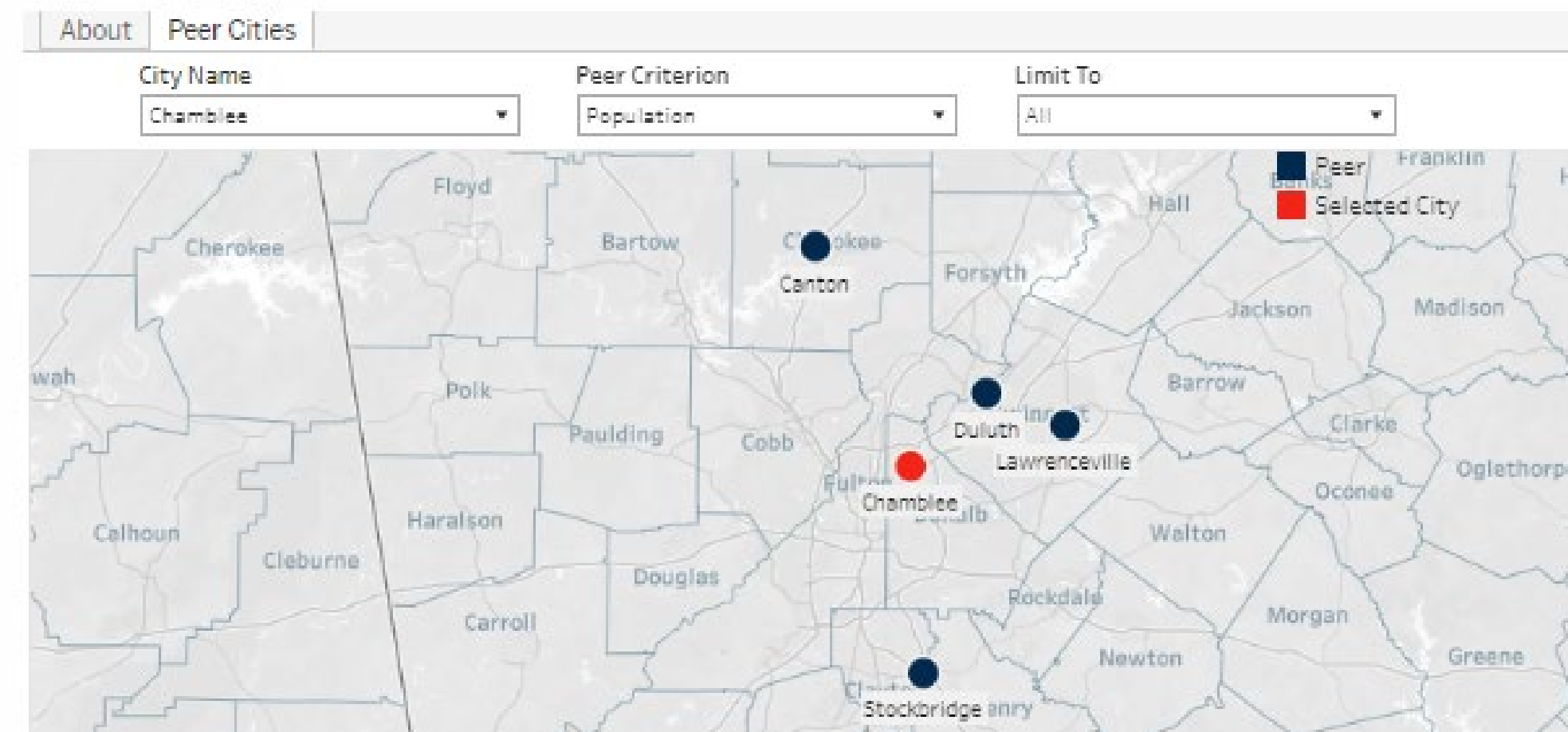
Section B - GENERAL SALES AND USE TAXES		
Local Option Sales Tax (LOST)	31.3100	\$1,466,222
Special Purpose Local Option Sales Tax (SPLOST) - (For County Use Only)	31.3200	\$1,808,801
Local Option Sales Tax - Homestead (HOST)	31.3300	\$0
Special Purpose Local Option Sales Tax (TSPLOST1 - Regional/Multi-County)	31.3400	\$0
Special Purpose Local Option Sales Tax (TSPLOST2 - Single County)	31.3500 - Formerly 31.3900A	\$0

Why we collect it?

- Requested by GMA, ACCG, CVIOG, Legislative Offices, Universities and more



Georgia Cities Like Mine



Checking Compliance



Checking Compliance

- <https://www.dca.ga.gov/local-government-assistance/research-surveys/compliance>
- Jurisdiction-specific inquiries can be emailed to DCA.Research@dca.ga.gov
- Reflective only of DCA Research requirements – does not include other agencies (DOAA LG Audit, for example) or other statutory requirements within DCA (Comprehensive Plans/Plan Updates, SDS, CIE, etc.)

Research & Surveys

Access the 2021 Reporting Calendar for Local Governments and Local Authorities at <https://www.dca.ga.gov/node/7014>

The Research & Surveys group collects, maintains and publishes data for Georgia's local governments and authorities.

✓ [Bond Allocation Program](#)
✓ [Condemnation Proceedings](#)
✓ [Government Management](#)

✓ [Compliance](#)
✓ [Debt Issuance Reporting](#)
✓ [Hotel Motel Excise Tax](#)



Checking Compliance

- When the report is received, compliance is restored.
- Check for compliance in advance because reports may take time.
- Know any deadlines that may occur before applications are reviewed.



Local governments – cities, counties, and consolidated governments – listed on this document are not in compliance with state reporting requirements and are barred from receiving state-appropriated funds from the Department of Community Affairs until the specified reports are received. Local governments are required to have the three most recently years’ Government Management Indicators Survey (GOMI) and Report of Local Government Finance (RLGF) submitted to the Department of Community Affairs.

Jurisdictions on the following list have not submitted one or more of these six requirements. This list is sorted alphabetically by jurisdiction and lists each missing report with its corresponding fiscal year or year. The RLGF is due 6-months after the end of each jurisdiction’s fiscal year, and the GOMI is due June 30th for all jurisdictions.

This PDF document is updated on a weekly basis. If you have any immediate questions regarding a jurisdiction’s status or respective compliance requirements please e-mail DCA.Research@dca.ga.gov.

List Prepared and Accurate as of December 31, 2021

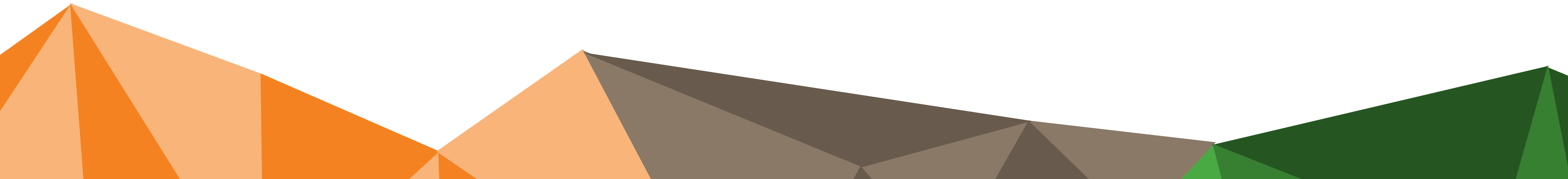
GOVERNMENT	REGION	FYE	DELINQUENT REPORTS
Adrian City	09	December 31	2021 GOMI FY2019 RLGF FY2020 RLGF
Alamo Town	09	December 31	2021 GOMI
Alapaha Town	11	October 31	FY2020 RLGF
Aldora Town	04	December 31	2021 GOMI
Allenhurst City	12	December 31	2021 GOMI
Alma City	11	June 30	2021 GOMI
Alto Town	02	December 31	2021 GOMI FY2020 RLGF
Ambrose City	11	December 31	2021 GOMI



Questions and Inquiries

Jackson Lilly
Research and Data Analyst
Jackson.lilly@dca.ga.gov
404-679-3105

DCA Office of Research
www.dca.ga.gov
DCA.Research@dca.ga.gov



Up Next...

Reporting Requirements for Local Governments

Jacqueline Neubert, Manager

Department of Audits and Accounts

Neubertj@audits.ga.gov





DOAA

Georgia Department
of Audits & Accounts



January 2022 CDBG Applicants' Workshop

Local Audit Requirements

1/11/2022



DOAA

Georgia Department
of Audits & Accounts

206

Importance of Complying with Required Financial Reporting

Learning Objectives:

- Describe financial reporting requirements of government entities to the Department of Audits and Accounts (DOAA) and possible consequences, if any of a non-compliance status for local governments
- Describe the relationship between compliance status with the Department of Audits and Accounts (DOAA) and eligibility for State grant awards and programs

Reporting Requirements

Reporting requirements and possible consequences for non-compliance

- I. Annual financial reporting for local governments required by provisions of O.C.G.A. §36-81-7 (includes discussion of O.C.G.A. §50-8-38 - audits of regional commissions)
- II. Annual immigration compliance reporting required by provisions of O.C.G.A. §50-36-4
- III. Report of local retirement systems required by provisions of O.C.G.A. §47-20-1

O.C.G.A. §36-81-7

Local Governments

- Requires annual audits for each unit of local government and requires submission to State Auditor or DOAA

State Auditor or DOAA

- Requires the State Auditor to review the reports to ensure compliance with generally accepted government accounting principles, generally accepted government auditing standards, and federal and state regulations

Annual Financial Reporting

Annual Audits

- For each unit of local government with expenditures of \$550,000 or more
- Financial affairs and transactions of all funds and activities for each fiscal year

Agreed-Upon Procedures (AUP)

- For each unit of local government with expenditures of less than \$550,000
- Financial affairs and transactions of all funds and activities for each fiscal year



Definitions of Unit of Local Governments

Unit of Local Government

- Defined as municipality, county, consolidated government or other political subdivision (local government authority)

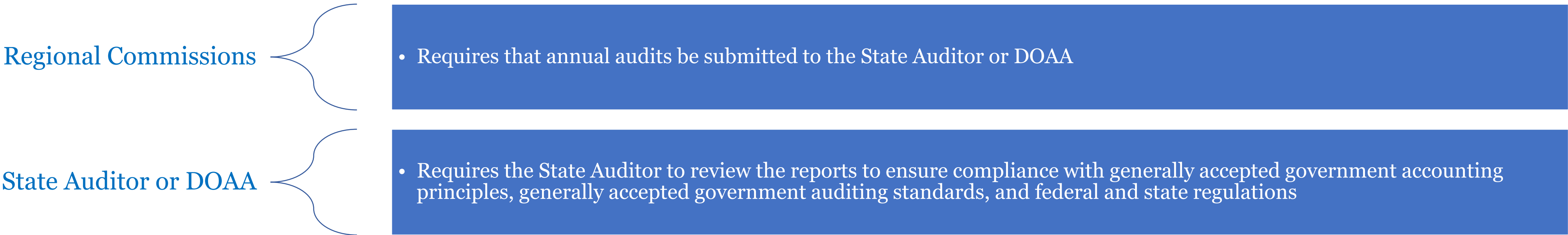
Other Political Subdivisions

- Local government authority created as Other Political Subdivision (OPS)

OPS Examples

- Water Authority
- Water and Sewer Authority
- Airport Authority
- Development Authority
- Joint Development Authority
- Public Facilities Authority

O.C.G.A. §50-8-38



Submission of Annual Reports

- Audit reports – submitted to State Auditor within 180 days after close of fiscal year
- Agreed-Upon Procedures reports – submitted to State Auditor within 180 days after close of fiscal year

Submission of Documents

Encouraged to electronically submit

Upload all documents associated with fiscal year

Use the Local Government Audit Report Collection System

Submit transmittal document (with current email addresses for contacts)

Helps us deliver desk review results to correct/current recipients

Compliance with O.C.G.A. §36-81-7

Not Submitted or Unaccepted		
No state agency shall transmit any state grant funds	To any government which has failed to provide all audits	Required by law within the preceding five years

Compliance with O.C.G.A. §36-81-7

Quarterly non-compliance list sent to State agencies

State grantor agency officials are urged to contact DOAA
to verify potential grantee's eligibility

Verification of eligibility to receive state grant fund
transmittals prior to grant award and transmittal

DOAA will confirm compliance status upon request

Non-compliance list is valid as of the date prepared

Annual Immigration Compliance Reporting

Annual Immigration Compliance Reporting (5 areas)

Confirm Reporting Government's E-Verify Number

Title 13 (Contract Reporting)

Title 36 (Business Licenses)

Sanctuary Policy (Compliance with
O.C.G.A. §36-80-23)

Title 50 (Public Benefits)

Reporting Reminders

- Report due each December 31
- Reporting period: December 1, 2020 – November 30, 2021
- The Immigration & Reform Act Collection System opened on November 1, 2021
- Reporting deadline for 2021 reporting period was Dec. 31, 2021
- O.C.G.A. §50-36-4 requires all Georgia governmental entities to submit an annual immigration compliance report

Annual Immigration Compliance Reporting

- As mentioned earlier, O.C.G.A. §50-36-4 provisions require all Georgia governmental entities to submit an annual immigration compliance report
- Electronic reporting using DOAA's Immigration & Reform Act Collection System
- Approximately, 2,420 total Georgia governmental entities reporting
- Types of governmental entities reporting include cities (and consolidated governments), counties, regional commissions, local authorities, community service boards, libraries, local boards of education, regional educational service agencies, technical colleges, units of the University System, and State agencies, boards, authorities and commissions

Focus on Two Areas of Immigration Compliance Reporting

Title 13 (Contract Reporting)

- O.C.G.A. §13-10-91

Sanctuary Policies

- O.C.G.A. §36-80-23

Title 13 or Contract Reporting

Report contracts for the physical performance of labor and services

Includes: routine operation, repair and maintenance of existing structures and services needed for normal operations

Report contracts that are over \$2,499.99

Contracts using bid process require affidavits regardless of amount

\$2,499.99 threshold applies to non-bid contracts

Contractor Reporting

- List of contractors the entity used during the period for physical performance of labor and services
- Documentation of contractor compliance (obtain notarized affidavit that states the contractor used the E-Verify program)
- Affidavit required even if contractor only has one employee
- New affidavit required each time you contract with a vendor
- Obtain affidavit in advance of awarding bid or contract

Common Reporting Issues

- Contracts are reported based on the date contract was entered into rather than payment date
- Services performed remotely (but within the U.S.) need to be included in the report
- Work can be performed anywhere in the U.S.
- For services performed in a different country, there is no requirement to obtain an affidavit or report the contract

Possible Consequences or Penalties of Noncompliance

- **Failure to complete the Title 13 section or area may result in exclusion from the list of qualified local governments (QLG)**
- DOAA is required to provide political subdivisions 30 days to demonstrate compliance
- Notification will include any noncompliant municipalities, consolidated governments and counties
- For 2021 reporting period, DOAA plans to notify noncompliant governments around January 26, 2022 (with the 30-day period ending on February 25, 2022)

Possible Consequences or Penalties of Noncompliance (continued)

- Commissioner of Department of Community Affairs (DCA) required by provisions of O.C.G.A. §13-10-1(b)(7) to be notified of noncompliant governments
- Commissioner of DCA is notified at the conclusion of 30-day period of any local governments remaining noncompliant
- **DCA should exclude governments not in compliance from the list of qualified local governments (QLG)**
- Failure to be recognized as a QLG may jeopardize funding of any grants or loans made through DCA (including State Community Development Program)

Sanctuary Policy Reporting

Provisions of O.C.G.A. §36-80-23 require confirmation that governments did not enact any sanctuary policies

No local governing body shall enact, adopt, implement or enforce any sanctuary policy

Annual report includes a question that asks the local government to confirm that no sanctuary policies were enacted

Sanctuary Policy Definitions

➤ “Sanctuary policy” defined as

- any regulation, rule, policy or practice adopted by a local governing body
- which prohibits or restricts local officials or employees from communicating or cooperating with federal officials or law enforcement officers with regard to reporting immigration status information
- while acting within the scope of their official duties

Sanctuary Policy Annual Report

Question: This organization has not enacted a sanctuary policy and is in compliance with O.C.G.A. §36-80-23.

Indicate **True** or **False**

True if: Entity does not have any policy that prohibits employees from notifying federal officials of a person's immigration status while acting within the scope of their official duties

False if: Entity has any type of policy that would prohibit or discourage employees from notifying federal officials

Possible Consequences or Penalties of Noncompliance

Governments will be reported as noncompliant if:

- Noncompliance with provisions (sanctuary policies enacted)
 - Failed to confirm (no response)
-
- Provisions of O.C.G.A. §36-80-23(d) require DOAA to notify state agencies of noncompliance
 - Specific notification to the Commissioners of DCA and Georgia Department of Transportation (GDOT)
 - Notification to all other state agencies that provide funding

Report of Local Retirement Systems

O.C.G.A. §47-1-4

- Report published every two years
- To provide information about local retirement plans in Georgia and
- Their adherence with the Public Retirement Systems Standards Law

Non-Compliance Reported to State
Treasurer

- Reporting requirements of O.C.G.A. §47-1-3
- Minimum funding requirements of O.C.G.A. §47-20-1



Elements of Report

O.C.G.A. §47-1-4: Requires the State Auditor to report on the financial condition of local retirement plans every 2 years

O.C.G.A. §47-1-5: Requires the State Auditor to notify the State Treasurer of governments not in compliance with reporting requirements (withhold any state funds)

O.C.G.A. §47-20-21: Requires the State Auditor to notify the State Treasurer of governments that did not meet the minimum funding standards (withhold any state funds)

Report of January 1, 2021

- 2,145 governmental units notified
 1. 530 municipalities
 2. 152 counties
 3. 7 consolidated governments
 4. 12 regional commissions
 5. 180 local boards of education
 6. 1,264 local authorities

- Total of 458 defined benefit retirement plans
 - 73 administered by single employer defined benefit plans
 - 286 administered by GMEBS (agent-multiple employer)
 - 99 administered by ACCG (agent-multiple employer)

Surveys: Retirement Plan & OPEB

- Biennial Report of Local Retirement Plans published as of January 1 of odd-years
- DOAA sends surveys in July of even-years
- Survey for type of retirement plan (no plan, defined benefit plan and/or defined contribution plan)
- Survey for types, if any, of Other Post-Employment Benefit Plans (OPEB)

Contact Information

Questions?

Please contact the Nonprofit and Local Government Audits Section at locgov@audits.ga.gov or (404) 656-9145

Jackie Neubert, CPA, CGFM, Deputy Director

Email address: neubertj@audits.ga.gov


Or

Eric Moody, CPA, Manager

Email address: moodyen@audits.ga.gov

Final Opportunity to Ask Questions



Listen only mode will be disabled. Use the raise hand  feature to be called upon to verbally ask your question or type the question the chat/question bar.