

Wage Rate Guide: Community Compass Technical Assistance Cooperative Agreements Version 2-- July 2023

The CPD Technical Assistance Division (TAD) provides this guide that governs staff, contractor, and consultant rates for Community Compass Technical Assistance (TA) cooperative agreements. This guide supersedes previous issuances of guidance for all TA award years and funding sources. TAD's Wage Approval Group (WAG) will determine the reasonableness of all rates in accordance with 2 CFR 200.404 - Reasonable Costs. All wage rates should be consistent with rates ordinarily paid for similar work in the Recipient's organization and by other prudent employers for similar work in the same labor market. The Community Compass Cooperative Agreement Officer (CAO) reserves the right to deny approval of the rate for any staff, contractor, or consultant that does not meet the requirements of this guide. Recipients will only be reimbursed for approved wage rates.

I. Definitions

STAFF: An employee that works directly for the Recipient, which dictates the terms and specifics of how the employee works.

CONTRACTOR: A person or company who performs work under a contract with the principal Recipient. Contractors perform a service for the Recipient but make independent decisions about how to perform that service.

CONSULTANT: A person who provides expert advice professionally but does not perform work. Consultants perform a service by offering independent advice about how to achieve a desired outcome.

SUBRECIPIENT: An entity that receives a subaward from the principal Recipient to carry out part of a federal award; but does not include an individual that is a beneficiary of the award. Subrecipients are responsible for adhering to federal program requirements specified in the award. Staff, Contractors, and Consultants are paid a **Base Rate**. For staff only, Recipients may also include Fringe, Overhead, and General & Administrative expenses as separate amounts. For contractors and consultants, however, their Base Rate should be the **Fully Loaded Hourly Rate**, i.e., no additional

expenses. Contractors and consultants must charge the same base rate to all Community Compass Recipients.

II. General Wage Request Terms & Conditions

Community Compass Recipients cannot charge HUD more than Level IV of the Federal Executive Schedule annually for an individual's compensation, even if the individual earns more than the capped amount. The compensation cap does not require Recipients to limit the amount paid to individuals funded on Community Compass grants; an individual's remaining compensation over the cap must be paid from an alternate source of organizational funds. This requirement applies to all Community Compass Recipients' staff, consultants, and contractors. If the salary cap amount for Level IV of the Federal Executive Schedule, authorized by law, increases, if adequate funds are available in active awards, and if the salary cap increase is consistent with the Recipient's compensation policy, Community Compass funds may cover the increased salary amount. However, additional funds will not be provided to cover these costs.

PRE-AWARD PROCEDURES:

Recipients must maintain written Procurement and Compensation policies that are compliant with 2 CFR 200 and meet the terms of the cooperative agreement. Recipients are expected to follow these policies and adhere to Federal, State, and local requirements, as applicable, when acquiring services or performing work under the TA award. Recipients are expected to immediately provide to HUD any changes or updates to written Procurement and Compensation Policies. Updated policies must be emailed to <u>communitycompass@hud.gov</u>. At any time, Recipients must make available, upon HUD request, any and all procurement-related actions, documents, and agreements for TA services billed to the TA award.

<u>New Recipients must request wage approval</u> for staff, contractors, or consultants in the Disaster Recovery Grant Reporting (DRGR) system. Visit the DRGR homepage for links to additional resources on how to submit wages.

POST-AWARD PROCEDURES:

CAO approval of all labor rates must occur before an awardee can claim reimbursement of labor costs for staff, contractors, or consultants, unless otherwise authorized. Recipients should obtain CAO approval prior to incurring labor costs as a Community Compass preferred practice. Please note: the Recipient assumes risk of nonpayment if costs are incurred prior to the WAG's determination of reasonableness and CAO approval.

Recipients must identify the name, rate type (i.e., staff, contractor, or consultant), labor category, and occupational type (see page 4 for list of definitions) for each wage request.

<u>Base Rates</u> less than \$200 per hour may be approved within 7 business days for all Recipients with certified Wage Compensation and Procurement Policies on file.

Changes to any existing Community Compass-approved rates shall be based on the Recipient's certified compensation policy. The date the Recipient issues the new rate is the effective date of the increase, but the Recipient may not charge HUD the new rate until the WAG has approved. All changes to rates should be submitted at least 30 days before the first voucher submission that includes the new rate.

Recipients with variable pay periods must account for fluctuations in total staff rate per hour and submit the highest possible rate for review.

Work Plans & Vouchers:

Work plans should utilize the approved rates in effect when the work plan is initially approved. Existing work plan budgets do not require amendment for an approved increase in wage rates. If the cost of the increase is less than 10% of the original work plan budget, then only written notification of the GTR is required. If the latest approved wage rate results in a work plan budget increase of 10% or more, an amendment and approval of the work plan is required. Vouchers should reflect the approved rate in effect when the service was rendered.

Contract Agreements:

Recipients may be required to furnish documentation and justification for the need of any contractor/consultant services/products when requesting approval of the respective wage rate. See section of Provisions that requires submitting contractor agreements.

SUBRECIPIENT AGREEMENTS:

A formal agreement that the principal Recipient has in place with the subrecipient (as defined above). The agreement creates a relationship between the principal Recipient and the subrecipient for the duration of the award period of performance and should provide a description of the activities to be provided during the design and delivery of TA.

HIGH WAGE REQUEST PROCEDURES:

Any base rate that is \$200.00 or greater per hour is considered a high wage and requires completion and submission of the High Wage Worksheet in DRGR. Recipients must complete the High Wage Worksheet, which identifies the work plans where the individual's subject matter expertise is needed. If no work plan is applicable, identify the HUD program and/or projected tasks for which the individual's expertise is required.

III. Determining Reasonableness of Wage Rates

Per 2 CFR 200.404, a cost is reasonable if, in its nature or amount, it does not exceed costs that would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs. The question of reasonableness is particularly important when the non-Federal entity is predominantly federally funded. WAG will determine the reasonableness of base rates (as defined below) in accordance with 2 CFR 200.404 - Reasonable costs. The WAG will consider:

- Information provided in High Wage Worksheet submitted by Recipient.
- Availability and/or unique nature/need of the service to be provided.

- If the staff/consultant/contractor proposed reflects a significant deviation from the established practices of the Recipient which may unjustifiably increase the award costs.
- Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the Recipient or the performance of the work requested.
- Past pattern of consultant and contractor costs, particularly in the years prior to the award of sponsored agreements.
- The annual cost and number of hours for the proposed engagement.
- The value of the proposed staff/consultant/contractor to the Recipient's TA capability.
- Compliance with Recipient's certified compensation and procurement policies.
- Magnitude of increase from previously approved wage rate.
- Consistency with rates ordinarily paid for similar work in the Recipient's organization and by other employers for similar work in the same labor market.
- The current rate of inflation. Rate increases of more than 5% annually are deemed significant and require an explanation at submission of request. **Definitions of Occupational Types**

Occupation	Occupation Type Definition
Туре	
Accountant	Prepares asset, liability, and capital account entries by compiling and analyzing account information.
Accounts Payable Manager	Oversees a team of accounts payable clerks and/or bookkeepers managing payroll processes, employee reimbursements, and vendor payments. Duties generally include overseeing the utilization of financial software applications and transitions to new systems.
Administrative Manager	Plans, directs, and coordinates supportive services of an organization.
Administrative Specialist I	<\$25 per hour - Perform routine clerical and administrative duties. Organize files, prepare documents, schedule appointments, and support other staff.
Administrative Specialist II	\$46 - \$39 per hour - Perform routine clerical and administrative duties. Organize files, prepare documents, schedule appointments, and support other staff.
Administrative Specialist III	> \$40 per hour - Perform routine clerical and administrative duties. Organize files, prepare documents, schedule appointments, and support other staff.
Architect	Plans, creates models, and manages building constructions.
Attorney	Advise clients concerning business transactions, claim liability, or legal rights and obligations. Interpret laws, rulings, and regulations for individuals and businesses.
Auditor	Prepare and examine financial records. Ensure that financial records are accurate and that taxes are paid properly and on time. Assess financial operations and work to help ensure that organizations run efficiently.
Business Analyst I	<\$100 per hour - Review business processes to gain a complete understanding of current procedures, identify improvements, document those processes, and connect business people to information technology (IT) groups in an organization.
Business Analyst II	\$101 - \$199 per hour - Review business processes to gain a complete understanding of current procedures, identify improvements, document those processes, and connect business people to IT groups in an organization.

Business Analyst III	>\$200 per hour - Review business processes to gain a complete understanding of current procedures, identify improvements, document those processes, and connect business people to IT groups in an organization.
Civil Engineer	Conceive, design, build, supervise, operate, construct, and maintain infrastructure projects and systems in the public and private sector, including roads, buildings, airports, tunnels, dams, bridges, and systems for water supply and sewage treatment.
Communications Specialist	Create, edit, translate, and disseminate information through a variety of different platforms. Develop the overall communications strategy and implementation plan to inform, educate, engage, and develop support from stakeholders.

Construction Engineer	Apply a broad and in-depth working knowledge of site construction and electronics to a wide variety of assignments through the application of technical concepts, practices, and procedures. Work closely with construction crews and state roadway engineers to design site layouts and test system networks. Knowledge of major road and other major construction project closures. Works with Engineering and Software teams to diagnose, test and find potential opportunities for better performance or cost savings of system design of build specifications.
Construction	Ensure that construction meets local and national building codes, ordinances,
Specialist Data Analyst	and zoning regulations. Responsible for collecting and analyzing data.
Economist	Study the production and distribution of resources, goods, and services by
	collecting and analyzing data, researching trends, and evaluating economic issues. Plans, designs, and conducts research to aid in interpretation of economic relationships and in solution of problems arising from production and distribution of goods and services.
Editor/Writer	Ensures text is readable, accurate and ready for final product. Work on products of all kinds, including books, flyers, and handouts. May check text to
	ensure it is well written and logically structured; correct grammar and spelling;
	plan, develop, organize, write, and edit operational procedures and manuals.
	Research, develop, and document technical design specifications and test scripts. Analyze documents to maintain continuity of style of content.
eLearning Specialist	Assists in the design, development, and deployment of learning modules and internal training events; captures modules in an e-learning authoring tool; makes modules available through an online education hosting environment; and maintains and updates the agency's e-learning program. Provide support in the design and development of e-learning courses and upload these to a Learning Management System. Provide guidance and technical support by means of creating storyboarding, instructional design, script writing/editing support, visual/audio aids creation, and testing/knowledge.
	Design, develop, or evaluate energy-related projects or programs to reduce energy costs or improve energy efficiency during the designing, building, or remodeling stages of construction. Conduct jobsite observations, field inspections, or sub-metering to collect data for energy conservation analyses. Conduct energy audits to evaluate energy use, costs, or conservation measures.
Energy Specialist	Basic understanding of the applications for energy conservation measures within facilities as well as how to utilize federal, state and utility-based incentive programs. Understanding of green building concepts, building codes, and legislation. Understanding of utility billing practices. Knowledge of energy related government requirements.

Environmental	Prepare, review, and update environmental investigation and
Engineer	recommendation reports. Collaborate with environmental scientists, planners,
	hazardous waste technicians, engineers, and other specialists, and experts in
	law and business to address environmental problems. Provide technical-level
	support for environmental remediation and litigation projects, including
	remediation system design and determination of regulatory applicability.
Environmental	Knowledge of environmental review, permit processing, and compliance
Specialist	programs for complex projects. Performs long-range planning related to
	housing development. Create and propose ways to eradicate pollution and
	hazards. Incorporate the different disciplines of environmental studies, such
	as ecology and natural sciences. Present environmental compliance training.
Financial Analyst	Develop budgets and estimate financial needs. Prepare budget reports and
	monitor institutional spending. Analyze financial data by collecting,
	monitoring, and creating financial models for decision support.
Financial Manager	Coordinate with managers on financial issues. Provide feedback in relation
	to the departments' expenses, production, revenue contributions, and any
Coologist	potential variances in the budgeted costs.
Geologist	Carry out technical analysis of earth and its materials and evaluate the risks of geological hazards. Ensure that the hazardous geological factors are
	identified before starting with any engineering project at a specified site, as
	these may affect the work. Design and analyze sites that are environmentally
	sensitive. Provide design, analysis, and construction services for water
	resources and geo-technical projects. Can also advise on processes required
	for such suitability and developments and requirement of suitable
	construction materials.
Graphic Design	Create visual concepts, using computer software or by hand, to
Specialist	communicate ideas that inspire, inform, and captivate consumers.
Housing Specialist	Provides expert housing-related advice, consultation and guidance on
	housing programs. Provide guidance and strategies for affordable housing
	development and retention. Knowledge of short-term rental assistance
	programs, policies and processes.
Information	Provide expert advice on IT programs requiring effective development of
Technology	policies, procedures and strategies to ensure the optimum integration of
Specialist	operating systems, IT policies and guidelines, systems analysis, and
	evaluation and monitoring to ensure the security of vital computer systems
	and resources.
Instructor	Provides instructional support to adult learners. Designs and delivers
	class curriculum. Develops lesson plans.
Loan Specialist	Understands how one prepares and approves client applications for loans,
	leases or lines of credit. Working knowledge of lending principles. Evaluate
	or recommend best practices for fair loan applications. Ensure compliance
	with laws governing financial institutions and transactions.
Marketing Manager	Responsible for developing and implementing strategic marketing plans for
	an entire organization. Work on advertising, promotions, and marketing.
	Managers plan programs to generate interest in products or services.

[
Marketing Specialist	Conduct market research to find answers about consumer requirements, habits, and trends. Brainstorm and develop ideas for creative marketing campaigns. Assist in outbound and inbound marketing activities by demonstrating expertise in various areas (content development and optimization, advertising, event planning, etc.). Plan and execute initiatives to reach the target audience through appropriate channels (social media, e-mail, TV, etc.). Assist in analyzing marketing data (i.e. Fair Housing use rates) to help
	shape future marketing strategies.
Paralegal	Perform a variety of tasks to support lawyers, including maintaining and organizing files, conducting legal research, and drafting documents. Performs substantive and procedural legal work as authorized by law, which work in the absence of the paralegal would be performed by an attorney.
Program Manager	Oversees the award and progress across multiple work plan projects to be sure their benefiting each other and aligning with overall goals. Accomplishes human resource objectives by communicating job expectations; planning, monitoring, appraising, and reviewing job contributions; planning and reviewing compensation actions; and enforcing programmatic policies and procedures. Accepts ownership for accomplishing new and different requests, exploring opportunities to add value to job accomplishments and key performance outcomes in workplans accomplished.
Project Manager	Plan, budget, oversee, and document all aspects of the specific work plan. Organize the numerous parts of a project. Set up schedules and timelines to monitor progress and help make sure the project meets its goals. Track dates, budgets, and other information using spreadsheets. Sort reports, invoices, and financial files for quick access. Communicate with others, including the project team and client. Able to convey a project's status, which range from daily minutiae to long-term goals, to keep it on schedule. When problems arise, may need to troubleshoot and clearly articulate proposed solutions to all parties. Provide help with presentations and reports to allow other team members to concentrate on their area of expertise. Perform budgeting, monitor expenses, and project cash flow. Ensure that projects meet quality standards. Perform administrative tasks such as billing and bookkeeping.
Real Estate Specialist	Assist with various real estate and leasing responsibilities. Knowledge includes transactions related to lease/property management operations and acquisitions for public and private housing partnerships.
Research Specialist	Plan and conduct social/environmental scientific experiments to meet research project objectives. Researches, gathers, and analyzes census, demographic, and housing data to assist in identifying housing market study needs or to evaluate and/or support proposed projects or programs.
Structural Engineer	Structural engineers are civil engineers who are focused on the constructional and architectural integrity. Responsible for designing any kind of structure so that it can fulfill a specific purpose, and remain safe, economic, and functioning throughout its intended lifetime. Investigate both the immediate loads and demands on the structure, as well as any likely future changes, and ensure a structure is designed to withstand those loads. Design new builds and ensure older structures remain safe, and often design refurbishment schemes to ensure long life for existing structures. Work on many areas of construction, including building design, construction, repairs, conversions, and extensions.

Training and Evaluation Specialist Underwriter	Plan, conduct, and administer programs that train adult learners and improve their skills and knowledge. Plan training delivery and coordinate logistics for training sessions. Develop and distribute professional communications through various print, electronic, and web-based methods to provide end- users and other stakeholders with timely and relevant information. Expert in the analysis of risk in insurance proposals, determining policy terms, and calculating premiums based on actuarial, statistical, and background information. Knowledge about how to collect background information
Urban/Regional Planner	and assessments of risk while analyzing statistical data. Develop land use plans and programs that help create communities, accommodate population growth, and revitalize physical facilities in towns, cities, counties, and metropolitan areas.
Videographer	Operates video cameras, on location or in the studio, in the production of professional pre-recorded programming. Designs, transports, sets up, and operates production equipment, including audio and lighting equipment, for field and studio productions. Computer edits video segments on a variety of tape and digital formats. Completes trouble and preventive maintenance reports on video and audio production equipment
Web Development Specialist	Develop, maintain, and continuously improve interactive databases as well as static content for websites as well as implementation, and maintenance of information for the websites. Develop interactive database applications and associated project functions. Provide technical advice and instruction applications for web-based application enhancement. Make improvements to websites by analyzing program data, research findings, or national trends, applying expertise in web-based design, and guiding the development of recommended changes to improve display of content or data collection processes. Develop business cases for Internet-related projects including: customer needs, strategic benefits, identification of stakeholders, risks associated with implementation, technologies required, process descriptions, and expected costs.