

# ICDBG IMPLEMENTATION TRAINING FOR GRANTEES

—

## Project Implementation

OFFICE OF NATIVE AMERICAN PROGRAMS



# PROJECT IMPLEMENTATION

- ICDBG Regulations
- Establish a filing system for your ICDBG Project
- Complete Special Conditions
  - ❖ Environmental Review
  - ❖ Force Account
  - ❖ Firm Commitments



# PROJECT IMPLEMENTATION: ICDBG REGULATIONS – 24 CFR § 1003

- Subpart A – General Provisions
- Subpart B – Allocation of Funds
- Subpart C – Eligible Activities
- Subpart D – Application and Selection Process
- Subpart E – Imminent Threat Grants
- Subpart F – Grant Administration
- Subpart G – Other Program Requirements
- Subpart H – Program Performance

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-1003?toc=1>



# PROJECT IMPLEMENTATION – SPECIAL CONDITION: ENVIRONMENTAL REVIEWS

- **Goal:** Complete the appropriate Environmental Review for your ICDBG project; if applicable, request release of funds (form 7015.15) from HUD and receive release of funds (7015.16)
- **24 CFR § 1003.304(b)(2) - All grants** are conditioned upon completion of Environmental Review ([eCFR :: 24 CFR 1003.304 -- Funding process](#))
- **24 CFR § 1003.605(a)** - Submit a certification and request for release of funds ([eCFR :: 24 CFR 1003.605 -- Environment](#))



# PROJECT IMPLEMENTATION – SPECIAL CONDITION: FORCE ACCOUNT CONSTRUCTION

- If you will use tribal work forces for construction or renovation, **you must receive AONAP approval before starting this Force Account Construction**
- **Refer to 24 CFR § 1003.509 for a list of requirements to include in your force account approval request** (<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-1003/subpart-F/section-1003.509>)
- Documentation is required regarding: capacity, supervision, payroll, insurance
- Contracting and procurement standards apply to materials, equipment, and supplies



# PROJECT IMPLEMENTATION – SPECIAL CONDITION: FIRM COMMITMENTS

- **Strict Deadline: 6 months** to clear Firm Commitment Condition – **No Extensions!!** (verify this in the NOFO under which your project was funded)
- **Firm Commitment Documentation** (e.g., commitment letter, tribal resolution, etc.) required by the deadline (Refer to the NOFO Rating Factor 4 (Leveraging) for a list of documentation needed for various types of leveraged resources)
- **If not obtainable by the deadline, HUD will re-rate and re-rank your application;** if the application does not score high enough, the grant will be recaptured (Again, refer to Rating Factor 4 in the applicable NOFO for details)



# PROJECT IMPLEMENTATION: SUBRECIPIENT AGREEMENTS & COST SUMMARY

- ▶ COMPLY with [24 CFR § 1003.502](#) – Agreements with Subrecipients
- ▶ SEE ALSO [2 CFR § 200.331](#) – Subrecipients
- ▶ Notify and submit the following document to your ONAP Area Office (if there are changes):

**Cost Summary, HUD-4123** (establishes budget/sources of funds) [4123.pdf \(hud.gov\)](#)



# PROJECT IMPLEMENTATION: IMPLEMENTATION SCHEDULE

## Revise Your Implementation Schedule: HUD-4125

[4125.pdf \(hud.gov\)](https://www.hud.gov/4125.pdf)

- Establish project timeline
- Allow 60-120 days for Environmental Review
- Hire Project Manager
- Design Time
- Allow time for: Procurement, Bids, Preparation, & Award Delays
- Allow time for coordination with:
  - ❖ City (re: utilities)
  - ❖ Other Federal Agencies
  - ❖ State Agencies
  - ❖ Grant Close-out



# PROJECT IMPLEMENTATION: IMPLEMENTATION SCHEDULE (cont.)

## Revise Your Implementation Schedule: HUD-4125

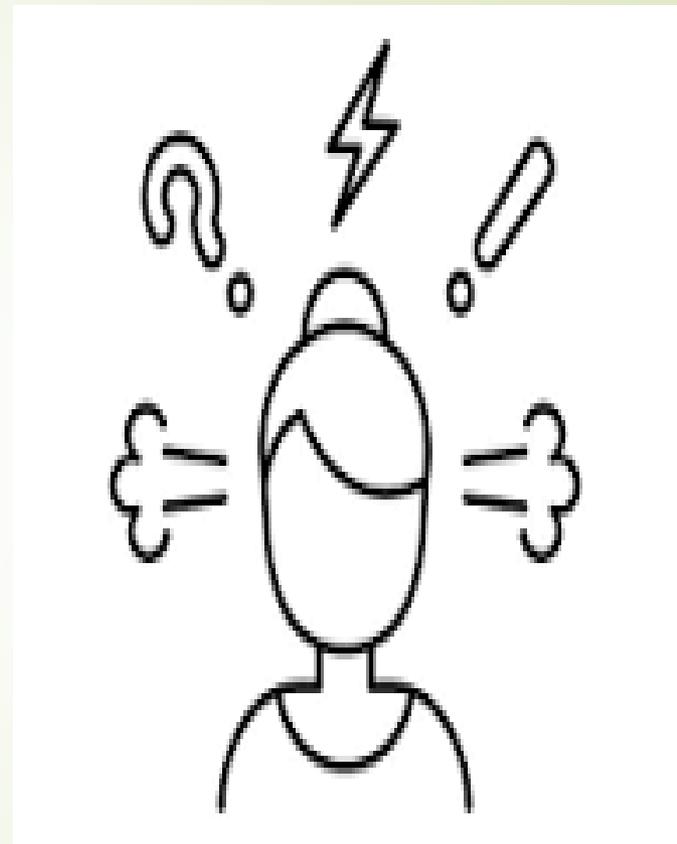
[4125.pdf \(hud.gov\)](https://www.hud.gov/4125.pdf)

- The grantee's implementation schedule includes key milestones like Environmental Reviews, hiring, design, bidding & procurement, construction, and grant closeout
- It's important to keep the implementation schedule up to date and to inform the AONAP of changes; **if you do not keep your implementation schedule up to date, future applications for competitive funding may be impacted**
- Send updates to the AONAP with explanation of delays and request for extension; extensions are generally approved except in unusual circumstances



# OVERWHELMED?!? NEED HELP???

- **Contact your Area ONAP**
- Your GMS is here to help guide you towards solutions & understanding
- Additional Training & Technical Assistance may also be available



[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/codetalk/training](https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/training)

# HUD CONTACTS: AREA ONAP POCs

All Area ONAP Offices and Contact Information is listed on the ONAP Codetalk website:

[ONAP and Tribe Contacts.pdf](#)

**Bookmark this link** on your computer so you have a quick and easy way to reach-out for help or guidance going forward



**QUESTIONS?**

*thank you*

