





# COMMONWEALTH OF VIRGINIA **COMMUNITY DEVELOPMENT BLOCK GRANT DISASTER RELIEF** (CDBG-DR)

CDBG-DR Financial Management and Grant  
Compliance Certification for Tropical Storm  
Helene Disaster Housing Strategy for  
DR-4831-VA

Virginia Department of Housing and Community Development  
DIVISION OF COMMUNITY DEVELOPMENT AND HOUSING

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Name of Grantee:	Virginia Department of Housing and Community Development
Date of Submission:	To be determined.

## Financial Management

[Section II. A. 1. a.(i) (ii)] This section includes the most recent audit and annual comprehensive financial report (AFCR). Links to the documents are forthcoming.

## Procurement Process

This section provides guidance on standards and guidelines for the procurement of all property and services used to implement CDBG DR activities by DHCD and its recipients. This includes, but is not limited to, supplies and equipment and construction, engineering, architectural, and consulting services. This guidance is provided to ensure that such property and services are obtained efficiently, economically, and in compliance with applicable federal and state laws and regulations.

Procurement standards used by state and non-state entities are different. State entities, such as DHCD, are to adhere to the Virginia Procurement Act which adheres to federal guidance 2 CFR 200.317. Non-state entities are to adhere to a minimum of 2 CFR 200.318 through 200.327. State entities must follow the same policies and procedures it uses for procurements from non-federal funds and ensure that all applicable federal clauses are included in every purchase order or other contract. A non-state entity must use its own documented policies and procedures when procurement property and services. When the entity's policies and procedures do not conform to federal laws and regulations, the non-federal entity must follow the most stringent of its policies and procedures and federal laws and regulations. The use of subrecipients or contractors does not relieve DHCD of this responsibility.

Violations identified, even after reimbursement of funds used for procurement has been issued, may result in a partial or complete return of federal funds.

The first step in managing the procurement process is ensuring that the entity's written procurement policy meets federal requirements. Non-federal entities must have written procedures for procurement transactions and should adopt these polices prior to soliciting bids or pricing, incurring costs, and entering into any contracts. These procedures must include:

- Standards of conduct that cover conflict of interest and employee engagement in the selection, award, and administration of contracts.

- Procedures to avoid acquisition of duplicate and unnecessary items and foster economical and efficient purchases.
- Procedures to ensure contractors are not debarred or suspended and are eligible to receive federal funds.
- Procedures to ensure costs are reasonable.
- Requirements to ensure records that detail the history of procurement are adequately maintained.
- Selection procedures to ensure procurement is carried out in a manner that provides maximum free and open competition and does not restrict or eliminate competition.
- Policies that detail the requirements for all methods of procurement.
- Procedures to maintain oversight of contractor terms and agreements and contractor performance.

All procurement transactions must be conducted in a manner providing full and open competition. To ensure unfair competitive advantages are eliminated, recipients must ensure that:

- Contractors involved in the development, request, and solicitation processes are excluded from competing for such procurements.
- Unreasonable qualifications, experience or product/performance requirements are eliminated.
- Noncompetitive pricing or retainer contracts are not allowed.
- Procurements do not contain statutorily or administratively imposed geographical preferences.
- Solicitations contain a clear and accurate description of the technical requirements for the materials, products, or services to be procured.
- Solicitations identify all requirements that must be fulfilled and all evaluating factors and methods.

Prequalified lists of contractors/vendors used in acquiring property and services are current and include enough qualified sources. Other potential bidders also must not be precluded during the solicitation period when a prequalified list is used.

Whenever the subrecipient issues a Request for Proposal solicitation that is grant funded, grant staff shall inform potential bidders through language in the RFP that subrecipient may not execute a grant-funded subaward unless they have a valid DUNS number on file.

In an effort to collect DUNS numbers on DHCD forms, as needed to comply with the Federal Funding and Accountability Transparency Act, the Grant Contact and Encumbrance Information Sheet has been updated to collect the DUNS number of the subrecipient and / or contractor, all which may also be referred to as vendors.

Per 2 CFR part 200.321, DHCD must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Recipients of federal awards must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps include, but are not limited to:

- Placing qualified businesses on solicitation lists.
- Assuring qualified businesses are solicited whenever they are potential resources.
- Dividing total requirements into smaller tasks or quantities to permit maximum participation.
- Establishing delivery schedules that encourage participation by qualified businesses.
- Using services and assistance of qualified organizations.

Requiring prime contractors to take the aforementioned affirmative steps when hiring subcontractors.

Solicitations or requests will include businesses selected from the list of certified small businesses maintained on the DSBSD and eVA web sites, [www.sbsd.virginia.gov](http://www.sbsd.virginia.gov) and [www.eva.virginia.gov](http://www.eva.virginia.gov). This shall include DSBSD-certified women-owned and minority-owned businesses and businesses with service-disabled veteran owned status that have also received the DSBSD small business certification.

It is the goal of the Commonwealth that over 42% of its purchases be made from small businesses. DHCD, along with its subrecipients encourages the participation of Small Businesses, Micro Businesses, and Small Women and Minority Owned Businesses (SWaM). Certifications can be obtained at the Virginia Department of Small Business and Supplier Diversity (DSBSD) website ([www.sbsd.virginia.gov](http://www.sbsd.virginia.gov)).

As defined by the Commonwealth, the following business classifications are listed below:

- **Micro Business:** "Micro business" means a business that has been designated in accordance with Regulations governing Certification by the Virginia Department of Small Business and Supplier Diversity (DSBSD). Designation requirements can be found at [www.sbsd.virginia.gov](http://www.sbsd.virginia.gov).
- **Minority-Owned Business:** "Minority-owned business" means a business that has been certified in accordance with Regulations governing Certification by the Virginia Department of Small Business and Supplier Diversity (DSBSD). Certification requirements can be found at [www.sbsd.virginia.gov](http://www.sbsd.virginia.gov).
- **Small Business:** "Small business" means a business that has been certified in accordance with Regulations governing Certification by the Virginia Department of Small Business and Supplier Diversity (DSBSD). Certification requirements can be found at [www.sbsd.virginia.gov](http://www.sbsd.virginia.gov).

DHCD and its subrecipients are required to use one of the following methods of procurement for projects using CDBG DR funds. These methods align with 2 CFR 200.

### *Micro Purchases*

Procurement by micro-purchase is the acquisition of supplies or services wherein the aggregate dollar amount does not exceed the micro-purchase threshold (2 CFR 200.67). Currently, the micro-purchase threshold is set at \$10,000 (or \$2,000 for acquisitions for construction) except it meets other requirements as detailed in 48 CFR Subpart 2.1. To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

### *Small Purchases*

Small Purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property. If small purchase procedures are used, price or rate quotations shall be obtained from at least three qualified sources. The recipient entity can request quotes from qualified sources via telephone, fax, email, mail, or any other reasonable method. The recipient should maintain written documentation on the names of the businesses contacted and how they were contacted; the prices that were quoted; and the basis for selecting one firm over the other(s).

### *Sealed Bids*

Procurement by sealed bid requires bids to be publicly solicited and result in a firm fixed price contract awarded to the responsible bidder whose bid is the lowest in price. The sealed bid method is the preferred method for procurement construction but can also be used to procure other goods and services. In order for sealed bidding to be feasible, the following conditions should be present:

- A complete, adequate, and realistic specification or purchase description is available.
- The invitation to bid must define the items or services needed and must include any specifications and pertinent attachments.
- The invitation to bid must be publicly advertised.
- Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date of bid opening.
- Bids are received from two or more responsible bidders and the successful bidder can be made principally based on price.
- All bids must be opened at the time and place prescribed in the invitation for bids and must be opened publicly.
- A firm fixed price contract is awarded as a result of the bid process.

Any and all bids may be rejected if there is a sound documented reason.

This method is typically used to contract for professional consulting, architectural or engineering services. To determine the reasonableness of proposed costs, the grantee will need to obtain cost breakdowns showing all the elements of the scope of work and perform a cost analysis using the appropriate set of principles.

The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- Small business subcontracting plan and evidence of compliance – required for prime contracts in excess of \$100,000, unless the solicitation has a set-aside for small businesses, or no subcontracting opportunities exist.
- Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
- Proposals must be solicited from an adequate number of qualified sources.
- Recipients must have a method for conducting technical evaluations of the proposals received and for selecting awardees.
- A contract must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

Recipients must use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. This qualifications-based approach to the competitive proposals' method may not be used to purchase other than A/E services.

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used ONLY when one or more of the following circumstances apply:

- The item is available only from a single source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- DHCD requires approval for noncompetitive proposals in response to a written request from the recipient. Evidence of a cost/price analysis and evidence that all other types of procurement are not feasible are common requirements for approval.
- After solicitation of a number of sources, competition is determined inadequate.

To comply with 2 CFR part 200.318, Recipients of federal awards should promote the cost-effective use of shared services across the federal government. This can be accomplished using intergovernmental agreements, inter-entity agreements, or the common use of shared goods and services. However, piggyback procurement is not allowed. Piggybacking refers to using the results of another entity's procurement rather than conducting one's own procurement of property or services. A recipient of federal funds may not piggyback another recipient's procurement of a contract, even if the result of the procurement activity is that the same contractor or vendor is selected.

Subrecipients must notify the DHCD CDBG DR recipient staff of significant grant related activities such as: grant planning, grant submission, grant approval, recipient site visits, recipient program reviews, key staff changes, misconduct involving grant program financials or programmatic activities, client complaints, etc. These notifications allow the grants office to track subrecipients initiatives more effectively during the lifecycle of a grant.

All Pre-Contract requirements must be satisfied prior to getting approval from DHCD to expend DR Grant funds. This review involves forwarding to the DHCD staff and respective legal contacts any proposed grant related resolutions and respective attachments. The purpose of this review is to document specific detail, significant purchases and clear goals and objectives. During the Pre-Contract Review, the subrecipient will review all pre-contract documents against supporting documents to insure consistency and completeness. Similarly, DHCD staff will review grant related budget exhibits to ensure collaborative grants are accurately appropriated. Examples of formatting, Resolution Summary Sheets and Grant Fact Sheets are available in the CDBG Program grant manual. Grant related resolutions and respective attachments are to be submitted to DHCD through CAMS where they will be reviewed by DHCD DR program and financial staff.

DHCD and its Subrecipients shall not award grant assistance to applicants that are debarred or suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549.

Subrecipients are to ensure to the best of their knowledge and belief that prior to extending a subaward, the potential subaward agency or its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any federal department or agency. At a minimum, DHCD grant staff, subgrantee and/or subrecipients shall check the Excluded Parties List at [www.sam.gov](http://www.sam.gov) to ensure that the agency itself or principals of the subaward agency are not excluded or disqualified based.

A list of debarred and enjoined Commonwealth vendors is found at:

[https://logi.cgieva.com/External/rdPage.aspx?rdReport=Public.Reports.Report9020\\_Data](https://logi.cgieva.com/External/rdPage.aspx?rdReport=Public.Reports.Report9020_Data)

Companies that have been debarred and/or enjoined by the Commonwealth are identified on the eVA Inactive Vendor List. After accessing this eVA webpage, select (1) eVA Status, then (2)



select "Debarred" or "Enjoined" from the reasons listed to filter the eVA Inactive Vendor List for these two specific categories.

Verification of cost reasonableness is required for every procurement action involving the acquisition of property or services with federal funds in excess of the Simplified Acquisition Threshold (2 CFR 200.88). This includes property or services procured through noncompetitive proposal. Verification of cost reasonableness can be obtained by performing an independent cost or price analysis. This independent analysis can be done by grantee staff, by third party consultants, or by examination of existing price lists and product catalogs, but it is not based on bids received. At minimum, an independent analysis must be conducted prior to receiving bids or proposals. Additional analysis may be necessary depending on the facts surrounding the procurement activity (e.g., no price competition, inadequate competition, or changes in contract costs or terms).

### **Procedures to Maintain a Comprehensive Website**

DHCD has established a separate webpage dedicated to the disaster recovery activities assisted with the CDBG DR funds. The following items and all updates to the following will be maintained and available on the website:

- Action Plan (including all amendments);
- Each performance report (as created using the DRGR system);
- Citizen participation plan;
- Projections of expenditures and outcomes;
- Program-specific policies and procedures;
- All contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22; (including subrecipients' contracts); and
- A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).

### **Procedures to Detect Fraud, Waste, and Abuse of Funds**

DHCD's procedures include multiple measures to detect and prevent fraud, waste, and abuse of funds. These measures include the following:

*All beneficiary eligibility is verified using third party sources.*

#### *Code of Conduct*

2 CFR part 200.318(c)(1) requires DHCD and subrecipients to maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award, and administration of contracts. Articles governing the Commonwealth public procurement ethics are found in Virginia Code 2.2-4367-4377.

### *Conflict of Interest*

Conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the State or recipient is unable, or appears to be unable, to be impartial in the selection of a related organization for property or services procured for activities funded by a federal award. Conflicts of interest in the award and/or administration of contracts must be avoided. No employee of a federal award recipient may participate in the selection, or in the award or administration of a contract supported by federal funds if a conflict of interest, real or apparent, is involved. Such a conflict would arise when the employee, any member of their immediate family, their partner has a financial or other interest in the firm selected for award.

Example of a real or apparent (perceived) conflict: A jurisdiction desires to hire a contractor to perform grant administration activities and engineering services related to a CDBG-DR project. The jurisdiction conducts separate procurements for each of these separate services. After evaluating proposals for each service, the jurisdiction elects to award both the grant administration and engineering services to the same entity. This situation may or may not result in a conflict of interest, but that must be determined prior to signing the contracts. Consideration should be given to what responsibilities the grant administrator, per contract, will exercise over engineering services.

DHCD staff, subrecipients, contractors, and beneficiaries will be provided educational materials online through the application process, DHCD website, and the process of contracting to build awareness about potential fraudulent activities. The federal and state Fraud Hotline phone numbers and email addresses will be located on the DHCD CDBG-DR website and in the program guidelines. Key staff are required to attend fraud prevention training as available.

### *Monitoring*

Monitoring is key to assure program implementation, outcomes, and the prevention of fraud, waste, and abuse of funds. The following documentation maybe be reviewed during an onsite or desk monitoring:

- Program files
- Beneficiary files
- Financial records and sources documentations
- Audits
- Subrecipient policies and procedures

Subrecipients without a prior DHCD relationship are monitored within 12 months of program agreement execution date. DHCD will provide technical assistance for any related compliance matter, provided that reasonable notice is given requesting assistance.

DHCD shall be notified as quickly as possible by the grant staff upon the resignation, termination, or retirement of any grant's liaison or other key grant program staff member to

ensure that proper retention of information and continuous grants management occurs during the transition period.

DHCD shall immediately be notified upon receipt of a notice by a subrecipient's staff of a site or monitoring visit to be performed by the Federal Awarding agency (HUD). DHCD staff may assist in the preparation of the Federal Award Agency site visit, reviews, or audits.

Waste, fraud, abuse, misconduct, duplication of benefits, or any other serious deviation from acceptable grant practice when proposing, carrying out, or reporting activities or results that involve a grant is considered grant misconduct. Any form of grant misconduct or potential misconduct shall be reported to DHCD within twenty-four (24) hours. Upon contact, the DHCD staff will take a report and then work with the grant staff to insure all proper investigation and notification procedures are followed.

Annual monitoring schedules will be made based on annual risk assessments of subrecipients.

### **Procedures for Prevention of Duplication of Benefits**

The Robert T. Stafford Disaster Relief and Emergency assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding make certain that no "person, business concern or other entity" will receive duplicative assistance. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, grantees cannot comply with the Stafford Act without first completing a duplication of benefits (DOB) analysis specific to each applicant.

A DOB occurs when:

- A beneficiary receives assistance, and
- The assistance is from multiple sources, and
- The assistance amount exceeds the need for a particular recovery purpose.

In response to Hurricane Helene the Commonwealth of Virginia received disaster recovery assistance through HUD's Community Development Block Grant (CDBG-DR) Program. This assistance is intended to supplement, not replace, other public, private and nonprofit sector resources that have already been provided for the same need or loss. For example, if a family's damaged home costs \$100,000 to repair and the homeowner received insurance proceeds in that amount, the homeowner could not also receive federal disaster recovery funds to repair the home. Grantees should ensure that each program provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met by funds that have already been, or will be paid, from another source.

The purpose of this document is to outline how the Virginia Department of Housing and Community Development (DHCD) assures that all applications for assistance from the programs funded by DHCD (both housing and non-housing), as well as all projects implemented by DHCD grantees, contractors and subrecipients, will be reviewed for possible duplication of benefits. The procedures described below are

also applicable to all DHCD grantees and subrecipients, and must be incorporated in the design and administration of programs/projects undertaken by them.

The first step of the DOB determination (calculation) is to determine the amount of assistance needed and the amount of funds previously received, or to be received, for a disaster recovery activity. This is accomplished by first determining the applicant’s post-storm disaster need prior to the receipt or potential receipt of other funds. Next, all other sources of recovery assistance received, or available to be received, must be disclosed during the application process and must be verified. Other sources of funds include, but are not limited to: private insurance, the Federal Emergency Management Agency, the Small Business Administration (SBA), the National Flood Insurance Program, local and state funds, other federal programs, and private and nonprofit organizations.

The next step is to identify assistance that is not available for the activity. This consists of: funds received that are not for the same purpose as the CDBG activity(s); funds not available to the applicant, e.g. forced mortgage payoff, contractor fraud, etc.; funds from private loans not guaranteed by the SBA (forgivable loans are duplicative); and any other asset or line of credit available to the applicant, such as checking and savings accounts, stocks, etc. These funds are not considered to be duplicative and may be excluded from being deducted as a duplication of benefit. Finally, after subtracting from the proposed activity cost the duplicate funds received or available to receive, calculate the maximum CDBG award.

Once the maximum CDBG award has been determined, applicants will be required to sign an agreement (either subrogation or Cooperative Endeavor Agreement) requiring them to return to DHCD any assistance received for the same purpose as the CDBG disaster recovery funds. This agreement is to be monitored by DHCD program staff, grantees and subrecipients at least annually for three years. Unless an additional need is established, disaster recovery funds must be recaptured to the extent they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.

The following is an example of the above described process steps for DOB determination:

1. Identify the Applicant’s Total Need Prior to Any Assistance.....\$100,000
2. Identify All Potential Duplicative Assistance.....\$35,000
3. Deduct Assistance Determined to be Duplicative.....\$30,000
4. Maximum Eligible Award (Item 1 less Item 3).....\$70,000
5. Program Cap (if applicable).....\$50,000
6. Final Award (lesser of Items 4 and 5).....\$50,000

### *Unmet Needs*

Disaster recovery assistance needs are calculated at a point in time. As a result, subsequent circumstances may occur that affect the need. If, after the assistance has been calculated and/or a CDBG award has been made, an applicant can demonstrate a change in circumstances the award calculation may be subsequently reevaluated to take the increased need into consideration. Such changes in

circumstance include: vandalism, contractor fraud, an increase in the cost of materials and/labor, a change in local zoning law or building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be done before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired).

The federal regulation pertaining to this DHCD policy and procedure for identifying Duplication of Benefits is found in Federal Register/ Vol. 76, No. 221, November 16, 2011, which should be reviewed as part of determining Duplication of Benefits.

### *Monitoring for DOB*

The process for identifying and then monitoring for DOB begins with the review of each grant application, whether it is for a specific project or an individual beneficiary of disaster recovery CDBG funds. An applicant must provide detailed information about other sources of funds that were received or that may be received related to the activity for which CDBG funds are being requested. DHCD staff will review and verify the other funds to determine if they are for the same activity and exceed the need for recovery assistance. Once CDBG funds are awarded, minus any determined to be a DOB, applicants are required to notify DHCD of the receipt of any additional funds received for the same activity. Program staff review individual pay requests and project amendments to determine if other funds have been received that represent a DOB. In the event that additional funds are determined to be a DOB, funds will be withheld from future pay requests, and the approved project budget will be amended. In the event that all funds have been expended and a DOB is identified, the applicant will be required to repay the funds to DHCD for return to the U.S. Treasury.

Monitoring for duplication of benefits will also be incorporated into DHCD DR Grant monitoring policies and procedures.

### **Procedures to Determine Timely Expenditures**

Applications for the DHCD-administered CDBG-DR funds are accepted and processed electronically through its Centralized Applications and Management System (CAMS). This allows for the transparent and efficient processing of applications and remittances.

DHCD utilizes established application evaluation procedures toward timely award announces and executed contracts once subrecipients have met all precontract conditions.

Subrecipients' remittances are submitted through CAMS and routed through a streamlined review workflow. The DHCD policy is to process all remittances within 30 days of submission.

Reports on expenditures and expenditure rates at the subrecipient and program level are available to program management. Management reviews expenditures at least quarterly.

## Capacity Assessment and Staffing Analysis

Virginia DHCD certifies that it (along with any subrecipient or administering entity) currently possesses, or will develop and maintain, the necessary capacity to execute disaster recovery activities promptly. Furthermore, DHCD confirms that it has reviewed the applicable requirements for the use of grant funds.

## Compliance Certification and Signature

As required by the Universal Notice and the Allocation Announcement Notice, the grantee must make the certification below by signing where indicated.

### Compliance Certification

The grantee certifies that: it has reviewed the requirements of Public Law 118-158, Public Law 108 – 324, 109 – 148, 109 – 234, 110 – 252, 110 – 329, 111-212, 112-55, and 113-2 , which appropriates CDBG-DR funds, and the Universal Notice and Allocation Announcement Notice that establish the rules, waivers, and alternative requires and allocate CDBG-DR funds; that its responses to this checklist and submitted supporting documentation are accurate; that it will adhere to the controls, standards, processes, corrective actions, and procedures it described in this checklist and supporting documentation; and that it has in place proficient financial controls and procurement processes and that it has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud, and abuse of funds.

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**Signature of Certifying Official**

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**Printed Name of Certifying Official**

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**Date**