

# Tree Canopy and Tree Replanting Program

## Purpose

To assist in the long-term recovery to the August 2020 derecho by removing stumps and replanting trees native to Iowa to help restore the tree canopy in LMI areas and in communities devastated by the disaster. This program will mitigate the impact of future natural disasters by increasing resilience to disasters and reducing the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship.

## Version History

Version	Date	Summary Description
1.0	January 30, 2023	Round 1 Launch
1.1	March 28, 2023	Update to Project Delivery Amount

## Administration

This program is administered by the Iowa Economic Development Authority (IEDA). IEDA is a state agency which administers Community Development Block Grant-Disaster Recovery (CDBG-DR) awards issued to the State of Iowa by the U.S. Department of Housing & Urban Development (HUD). Administrative activities are led by the IEDA Disaster Recovery Team Lead and members of both the Disaster Recovery and Federal Programs teams.

## Available Funds

Program	Budget	Linn County	Marshall, Tama, and Benton Counties
Treeservation	\$5,500,000	\$4,400,000	\$1,100,000

## Eligible Applicants

Units of general local government (UGLGs) are the eligible applicants for these funds. This includes all city, tribal, and county governments within Linn, Marshall, Tama, and Benton counties. 100% of program funds will be allocated to Marshall, Tama, Benton and Linn Counties.

## Application Rounds

**Round 1:** IEDA will open applications for \$5,500,000 in funds for the removal of stumps and support the replanting activities occurring within the MID counties. Trees will be removed or replanted only on public property or the public right-of-way. January 30, 2023 applications will be open on IowaGrants until April 14, 2023 at 4 PM Central. This first round will allow the State to establish a competitive review process, gauge the capacity of the MID areas for replanting programs. If all funds are not obligated, future rounds will be established, at no less than one round per year, until the funds in this program are fully expended.



## Application Workshops

Round 1 Application Workshop Date: February 1, 2023

## National Objective and Eligible Activities

This program is designed to meet the Low to Moderate Income and urgent need infrastructure national objective. Eligible activities include: the removal of stumps and support the replanting activities occurring within the MID counties. Trees will be removed or replanted only on public property or the public right-of-way HCDA Section 105(a) 1,4,5,8,11,14,15,24; applicable waivers identified in the Allocation Announcement Notice and Consolidated Notice (87 FR 6364).

Low- to Moderate-Area Benefit or Urgent Need. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation public infrastructure benefits within the HUD- or grantee-identified MID.

## Disaster Tieback

This program addresses the infrastructure-related unmet needs in eligible MID areas impacted by the disaster. The Iowa Department of Natural Resources reported that nearly 4.5 million trees damaged or destroyed by the derecho in cities and 2.7 million trees in rural areas. The result was an estimated \$20 million loss in annual benefits from the disaster's devastation to the urban tree canopy. The report also found that Linn County lost a majority of the trees in the State. Trees provide a wide range of economic and mitigation benefits to communities, such as reducing the urban heat island effect and thus lowering energy costs during heatwaves and warmer weather, absorbing stormwater runoff in rain events, slowing vehicular traffic, and increasing property values and generational wealth for LMI households.

## Program Requirements

This program's intent is to help the communities recover from the derecho and mitigate against future disasters in the MID areas. With that, there are numerous requirements that come with federal assistance related to project management.

IEDA will seek to award program funds to a diverse range of neighborhoods and communities in order to not concentrate tree plantings to a singular area.

IEDA will make awards to cities and counties for the removal of stumps or planting of trees. Subrecipients will **procure** for trees. Subrecipients will also **procure** for a contractor or use local staff as **forced account labor**. A **contractor** is a for-profit or nonprofit individual or entity that the subrecipient provides CDBG-DR funding to for the purpose of planting trees and removing stumps.

All stump removal (including removal & site restoration) and plantings must occur in **Low to Moderate Income (LMI)** or over income areas. LMI areas are communities, census tracts, service areas, etc. in which at least 51% of residents are at or below 80% of the Area Median Income.



**Davis Bacon** prevailing wage requirements apply to all contractors and subcontractors working on projects awarded more than \$2,000. If a subrecipient uses their own staff to conduct tree planting and maintenance activities, Davis Bacon wages do not apply.,

All projects receiving more than \$200,000 in HUD assistance (including CDBG-DR) are subject to **Section 3**.

All planting and stump removals (including removal & site restoration) will be in accordance with all locally adopted and enforced codes and standards. In the absence of locally adopted or enforced building codes and standards, the requirements of the current Iowa State Building Code shall apply.

The applicant community, county or tribal organization must **plant trees and remove tree stumps on publicly owned lands and/or public right-of-way**.

Trees may be planted, and stumps removed, **within the mapped 100 and 500-year floodplains**. If trees are to be planted within the 100-year floodplain, the planting activities would need to follow an abbreviated version of the 8-step process according to 24 CFR 55.20, as subject to inapplicable provisions in 24 CFR 55.12(a)(4). See environmental review section of program guidelines later in this document for more information.

Any **contingencies** proposed in the application budget **may not exceed 15%**.

The **maximum percentage of a particular tree species cannot exceed 10% of any one species, 20% of any one genus, and 30% of any tree family** as defined by the Tree Diversity Rule unless granted an exception by IEDA. This is to avoid creating a monoculture and potentially incurring future mass tree loss due to invasive species or diseases. For that reason, **maple trees are not allowed** as maple trees make up approximately 33% of all trees in Iowa communities.

Prior to the Grantee’s (IEDA) obligation of funds, subrecipients will demonstrate that project costs are feasible, prior to the obligation of funds by IEDA.

### Incentive Amounts

Tree Incentive Per Unit	Project Delivery
\$900	\$100

Incentive amounts are awarded per tree planting or stump removal. 2 years of watering or care is included in the per tree incentive.

### Eligible Tree Species

Eligible trees include but are not limited to the following. Only trees native to Iowa and not susceptible to ongoing major tree epidemics/pandemics are eligible.



Eligible Trees	
Northern Pin/Hills Oak <i>Quercus ellipsoidalis</i>	Shingle Oak <i>Quercus imbricaria</i>
White Oak <i>Quercus alba</i>	Bur Oak <i>Quercus macrocarpa</i>
Chinkapin Oak <i>Quercus muehlenbergii</i>	Northern Red Oak <i>Quercus coccinea</i>
Scarlet Oak <i>Quercus coccinea</i>	Black Oak <i>Quercus velutina</i>
Pin Oak <i>Quercus palustris</i>	Oak Hybrids <i>Quercus x</i>
Cottonwood (Eastern Poplar) <i>Populus deltoides</i>	Kentucky Coffeetree <i>Gymnocladus dioicus</i>
Honey Locust (thornless) <i>Gleditsia triacanthos inermis</i>	American Sycamore <i>Platanus occidentalis</i>
Common Hackberry <i>Celtis occidentalis</i>	American Linden (Basswood) <i>Tilia americana</i>
Bitternut Hickory <i>Carya cordiformis</i>	Shagbark Hickory <i>Carya ovata</i>
Butternut <i>Juglans cinera</i>	Black Walnut <i>Juglans nigra</i>
American Plum <i>Prunus americana</i>	Yellow Birch <i>Betula alleghaniensis</i>
River Birch <i>Betula nigra</i>	Quaking aspen <i>Populus tremuloides</i>
Black cherry <i>Prunus serotina</i>	Black willow <i>Salix nigra</i>
Ohio buckeye <i>Aesculus glabra</i>	White pine <i>Pinus strobus</i>
Common Chokecherry <i>Prunus virginiana</i>	American Hophornbeam <i>Carpinus carolina</i>
Pagoda Dogwood <i>Cornus alternifolia</i>	Shadblow Serviceberry <i>Amelanchier canadensis</i>
Eastern Redbud <i>Cercis canadensis</i>	Prairie Crabapple <i>Malus ioensis</i>
Downy Hawthorn <i>Crataegus mollis</i>	

See the ReLeaf Cedar Rapids plan for more information on each of these tree species:  
[https://www.cedar-rapids.org/residents/parks\\_and\\_recreation/releaf\\_cedar\\_rapids\\_.php](https://www.cedar-rapids.org/residents/parks_and_recreation/releaf_cedar_rapids_.php).

See the Iowa DNR “Rethinking Maple” handout for alternatives to maple trees in Iowa communities:  
<https://www.iowadnr.gov/Portals/idnr/uploads/forestry/urban/RethinkingMaple.pdf>.



## Cost Reasonableness

All projects **must be cost reasonable**. IEDA will determine project cost reasonableness through the competitive application comparison, review, and selection processes and may obtain third-party verification on a case-by-case basis. As such, application budgets must be thorough and accurate for evaluation.

## Timeliness

As 2 years of watering and care is essential for the successful establishment of native trees, these awards will be issued for a minimum of 4 years to ensure there is enough time to complete federal compliance requirements, procure and plant the trees, and ensure viability.

## Promoting Equity in Recovery

This program is intended to help impacted residents, protected classes, vulnerable populations, and members of underserved communities. Subrecipients will be expected to reduce barriers to individuals impacted by disaster, protected classes, vulnerable populations, and members of underserved communities in accessing the housing market. These classes include:

Population	Type	Population	Type
Race	FHA, Iowa Civil Rights Act Protected Class	Disability	FHA, Iowa Civil Rights Act Protected Class
Color	FHA, Iowa Civil Rights Act Protected Class	Sexual Orientation	Iowa Civil Rights Act Protected Class
National Origin (including immigrants & refugees)	FHA, Iowa Civil Rights Act Protected Class	Gender Identity	Iowa Civil Rights Act Protected Class
Religion	FHA, Iowa Civil Rights Act Protected Class	Citizenship	Iowa Civil Rights Act Protected Class
Sex (including sexual orientation and gender identity)	FHA, Iowa Civil Rights Act Protected Class	Political Affiliation	Iowa Civil Rights Act Protected Class
Familial Status	FHA, Iowa Civil Rights Act Protected Class	Indigenous Populations	Vulnerable & Underserved Population

Subrecipients will be expected to expedite the recovery of these populations and their participation in this program by conducting efforts including but not limited to:

- Performing outreach and engagement to understand the needs of impacted participants
- Creating a personalized recovery plan (during the application phase) that addresses the needs of the local community
- Coordinating with government agencies and developers
- Coordinating with local organizations to ensure that refugee and immigrant populations are aware of the assistance and can access it
- Coordinating with local nonprofit organizations that provide services to people experiencing homelessness, people with disabilities, and historically underserved



populations to ensure the promotion of the program and help remove their barriers to access the assistance

- Completing a Language Access Plan and identifying language access needs for the community

In the Fair Housing and Outreach plan, applicants should also specify which mandatory and elective activities. Applicants must indicate how they will complete all of the mandatory activities, which are as follows:

Mandatory Activity	Description
1	Advertise, publicize, and pass an affirmative fair housing policy that will certify that the local government adheres to the requirements of the federal Fair Housing Act and the Iowa Civil Rights Act of 1965 (adoption and use of the Equal Housing Opportunity logo and the Equal Housing Opportunity statement)
2	Identify and publish the name and contact information of a Discrimination Complaint Officer within the agency or jurisdiction for any housing-related bias or discrimination complaint
3	Refer housing discrimination complaints and assist in filing complaints with the Iowa Civil Rights Commission, the U.S. Department of Housing and Urban Development, or a local civil rights commission

Applicants will also indicate which of the following elective activities that they will complete. The list of elective activities includes the following:

Elective Activity	Description
1	Advertise the availability of housing and related assistance to population groups that are the least likely to apply through various forms of media (i.e. radio stations, posters, flyers, newspapers, Facebook, city web page) in English and other languages spoken by eligible families within the project service area
2	Include a flyer about fair housing in a local utility or tax bill and send it to every household within the municipality
3	Have the Responsible Entity staff attend a fair housing training or conference
4	Organize a letter writing campaign to local legislators and/or local government staff about the need to fund and support fair housing programs
5	Sponsor trainings for realtors, bankers, landlords, homebuyers, tenants, public housing authority and other city/town employees to educate them on their fair housing rights and responsibilities. This activity MUST be done in collaboration with the Iowa Civil Rights Commission or a local civil rights commission
6	Provide training/educational programs about fair housing for financial, real estate, and property management professionals at local firms, including their obligations to comply with the federal Fair Housing Act and the Iowa Civil Rights Act of 1965 (this can be done by partnering with a bank, board of realtors association, or other local group and helping to sponsor a program taught by a qualified entity such as the Iowa Civil Rights Commission
7	Conduct meetings with advocacy groups for members of the protected classes on the availability of affordable and accessible housing and determine housing needs to plan future projects



8	Establish and/or fund fair housing organizations in areas where there are no such organizations
9	Conduct fair housing testing to ensure that local housing providers and/or lenders do not discriminate (fair housing testing must be conducted by a HUD-certified fair housing agency)
10	Assist Housing Choice Voucher program participants to help locate and secure housing outside of racially concentrated areas of poverty (RCAPs) or outside of areas nearby RCAPs
11	Conduct outreach to housing providers and housing developers to discuss affordable and accessible housing needs in RCAPs and near RCAPs
12	Evaluate the local zoning ordinance against fair housing benchmarks identified in this AI, using the Zoning Risk Assessment Tool. Evaluate the need for amendments to the zoning ordinance and make them.
13	Organize a tester recruitment event in collaboration with the Iowa Civil Rights Commission to help document instances of housing discrimination.

IEDA monitoring will include reviewing efforts indicated in the Fair Housing and Outreach Plans, along with the mandatory and elective activities to affirmatively further fair housing.

### Project Delivery

IEDA will only award applications with a project delivery entity indicated on the application. All non-entitlement subrecipients (cities/counties/tribes) will be required to contract with a council of government (ECICOG for Linn County) or procure an IEDA-approved consultant for project delivery services. Cedar Rapids and Marshalltown may conduct project delivery in-house or choose to use their local council of government or procure an IEDA-approved consultant. Under Iowa law, procurement is not required if a local government chooses to use their council of government (COG). COG or consultant staff working with the project will be required to maintain an active IEDA Certified Grant Administrator certification.

IEDA will award up to \$100 per tree in project delivery. The community, COG, or consultant will provide a lump sum estimate for project delivery in the application for CDBG-DR funding. Project delivery must be substantiated by documentation of costs incurred and cannot be duplicated by another federal funding source. Project delivery includes but is not limited to:

- Environmental Review Record documentation, including required publication costs
- Section 106 Historical Review
- Procurement
- Uniform Relocation Act compliance
- Lien development and filing
- Mortgage recording
- Income verification
- Federal Labor Standards compliance
- Section 3 compliance



- Financing/interest incurred for project implementation

## Exception Policy

IEDA will consider exceptions to the program guidelines on a case-by-case basis. All exceptions must be submitted in writing with the application and include a justification. Exceptions should enhance the benefit to LMI households or areas.

Exceptions cannot violate federal, state, or local laws or regulations. Exceptions must still meet HUD's requirements for necessary and reasonable, comply with federal accessibility standards, and accommodate a person with disabilities if applicable.

A written response will be authorized in writing to the applicant upon approval or denial of the application requesting an exception.

## Application Scoring Criteria

IEDA will use the following criteria to rank applications:

1. Rank the percentage of activities in LMI areas.
2. Rank the level of optional local match.
3. Rank the community's Tree Replanting Needs Assessment.
4. Rank the level of detail for proposed program activities.
5. Rank the level of project readiness.
6. Rank the community's proposed steps to Affirmatively Further Fair Housing.

## Required Application Documentation

Only complete, timely-received applications will be reviewed, scored, and ranked. Complete applications will complete all required fields in IowaGrants and provide at least the following required documentation unless granted an exception in writing by IEDA:

- **Site Plan** outlining where in the community proposed activities will generally take place (in order to determine LMI or UN national objective)
- **Resolution of support** from the city/county/tribe
- **Federal Assurances** signed by the Contractor and city/county/tribe
- **Subrecipient Assurances** signed by the applicant city/county/tribe.
- **DOB Application Certification**
- **CDBG-DR Subrogation Agreement**
- **Outreach plan** to LMI, underserved, and vulnerable populations
- **Staffing Plan** identifying and providing communication information for local and COG/consultant staff anticipated to be working on the project if awarded





- **Signed Affirmation of Receipt** of Iowa Attorney General contractor fraud checklist

## Post Award Steps to Release of Funds

All funded projects will be required to comply with all federal and state requirements including completing an environmental review. By signing the Federal Assurances, the subrecipient acknowledges and accepts these requirements. By passing a resolution of support and executing a contract with IEDA, the subrecipient (city, county, or tribe) assumes the responsibility of enforcing these requirements as the HUD-designated Responsible Entity (RE) in accordance with 24 CFR Part 58. The following steps will be required post award:

1. IEDA will enter into contract with the city/county/tribe for the award amount
2. The subrecipient will enter into a contract for project delivery (n/a for Cedar Rapids)
3. Release of Funds will be issued by IEDA

## Environmental Review & Release of Funds

Before Release of Funds can be issued by IEDA, an environmental review CEST 24 CFR 58.35(a)(1) process in accordance with the National Environmental Policy Act (NEPA) must take place to ensure compliance with all federal and state laws and regulations. An environmental review is an analysis of the impacts of a project on the surrounding environment and the environment's impact on the project itself. An environmental review:

- Demonstrates compliance with the 17 federal laws and authorities governing NEPA
- Is a public document that encourages public participation in its development
- Is coordinated by the subrecipient and grant administrator

Throughout the environmental review, **no choice-limiting** actions can be committed by the subrecipient or its partners. These include actions to commit or spend CDBG-DR or non-HUD funds for activities including but not limited to:

- Purchase of trees, property, or structures (including executing an option agreement)
- Bidding (or advertisement of bids)
- Signing construction contracts or any kind
- Construction, demolition, rehabilitation, repair, conversion, site improvements, and any phase of construction activities
- Platting and rezoning land (can work on preliminary plats and rezoning needs)
- Apply for building permits

If you have any questions regarding choice-limiting actions, please contact IEDA immediately.

If conducting activities within the **100-year floodplain**, all steps of the 8-Step Process except for Steps 2, 3, and 7 must be completed. See the 8-step process at 24 CFR 55.20.

## Compliance

The following compliance areas will be among those tracked throughout the project:



## **Claim Documentation and Reimbursement, 10% Retainage**

IEDA will reimburse funds for actual costs incurred up to the CDBG-DR award amount. Claims for reimbursement will be submitted via IowaGrants. The subrecipient shall maintain a file of all claim supporting documents, invoices, payments, and approval.

Claims are due within every 6 months. CDBG-DR assistance may be drawn down amid construction with supporting documentation of costs incurred submitted with the claim on IowaGrants. The final drawdown for reimbursement will only be granted once the “Demographic Data Collection” information is completed in IowaGrants.

10% of awarded funds will be withheld as a retainage until 100% of all invoices with all costs claimed are submitted to IowaGrants, reviewed, and approved. The subrecipient, in coordination with the grant administrator, will reduce the IowaGrants requested amount by the retainage so that the claim is paid in full.

Once closeout and compliance are complete, the subrecipient will claim the final 10% and IEDA will issue payment.

## **Contractor Clearance**

All contractors and contract data must be submitted for Contractor Clearance in IowaGrants. All work for construction must be recorded in a written, executed contract. All contractors must be registered to work in the State of Iowa.

## **Davis Bacon**

All projects with 2 or more awarded trees (\$2,000 or greater award) will be required to comply with Davis Bacon labor standards if using a contractor and not force account labor.

## **Duplication of Benefits (DOB)**

No DOB will be allowed. Subrecipients, in coordination with their grant administrators, will complete all necessary DOB documentation in accordance with the DOB Policy requirements noted in the 2020 Derecho CDBG-DR Policies and Procedures Manual.

## **Force Account Labor**

Force account labor would apply if the subrecipient were using staff employed by the city (e.g., public works department, urban forestry department, etc.) to remove stumps and/or plant and maintain the trees. All requests must include, at minimum, the following:

- Complete and certified supporting documentation (invoices, time sheets, equipment use and rate calculations, etc.) to support the requested amount; and
- A map of the project area that clearly identifies where the work has been completed to date, including the current request for payment, and where work will be completed in the future.



## Fraud, Waste, and Abuse

IEDA has zero tolerance for the commission or concealment of acts of fraud, waste, or abuse. Subrecipient and grant administrator staff will attend HUD OIG fraud training when provided. Any instances of fraud, waste, or abuse should be reported to the HUD OIG at 1-800-347-3735 or [hotline@hudoig.gov](mailto:hotline@hudoig.gov). All instances of fraud, waste, and abuse discovered by IEDA will be reported to the HUD OIG.

## Procurement

Subrecipients shall follow the federal procurement requirements detailed in the 2020 Derecho CDBG-DR Policies and Procedures Manual for CDBG-DR projects and in 2 CFR Part 200. Any procurement conducted by the subrecipient must comply with the procurement policy in the 2020 Derecho CDBG-DR Policies and Procedures Manual.

Any construction contracts procured through awarded projects must comply with the Bonding Requirements noted in the Procurement Policy in the 2020 Derecho CDBG-DR Policies and Procedures Manual.

All projects **must be cost reasonable**. IEDA will determine project cost reasonableness through the competitive application comparison, review, and selection processes and may obtain third-party verification on a case-by-case basis. As such, application budgets must be thorough and accurate for evaluation.

## Quarterly Performance Report

Subrecipients will report project progress at least quarterly in IowaGrants. This compliance form will outline progress made toward milestones outlined in the subrecipient's contract with IEDA. Progress on the following deliverables will be reported:

- Percentage of work completed
- Actual costs incurred to date of quarterly report submission
- Estimate timeline remaining to complete construction
- Progress narrative of work completed and any risks to the project

Reporting is necessary as it is used to document progress towards the achievement of outcome values identified in IEDA's CDBG-DR funded proposal. Reports will be due by January 5, July 5, October 5, and December 5 for the prior quarter.

## Safety Policy

The subrecipient will maintain safety procedures designated by federal and state law.

## Section 3

All projects receiving more than \$200,000 in HUD assistance at a project site are required to comply with the "new" Section 3 rule, as detailed in 24 CFR Part 75. This includes the tracking of all labor hours on the project sites, including projects not subject to Davis Bacon, and qualitative efforts undertaken to demonstrate compliance. See IEDA's Section 3 guidance for more information.



## Timeliness

All projects will be tracked by the IEDA project manager in the annual risk assessment for their timeliness in completion. The budgetary discrepancy limits for a 4-year project are as follows:

Year	Projected Expenditure	Discrepancy
Year 1	25%	60%
Year 2	50%	40%
Year 3	75%	20%
Year 4	100%	10%

These timelines were revised down from the 6-year timeline in the State’s HUD-approved certifications to reflect the shorter time span.

If the spending differential is found to be greater than the limit shown, the project manager will determine the reason by reviewing current reporting narratives or metrics to determine if the spending is reasonable in regards to the status of tasks and deliverables. The project manager will also determine if the delays in spending or the completion of deliverables/tasks can potentially result in a negative impact to the project. If the discrepancy in spending or progress is deemed reasonable, the project manager will continue to monitor the expenditures.

If the project manager has concerns about the spending discrepancy or the status of project deliverables/tasks, or the recipient has reported a spending discrepancy for 2 consecutive years, the project manager will confer with the Disaster Recovery Team Lead for next steps. One of the following action items will be taken:

- Annual spending projections will be amended
- Project manager will continue to monitor the project status
- A meeting with partner management will be held. Partner will submit revised quarterly budget projection and/or a plan to overcome progress delay.
- Terminate the agreement.

## Monitoring

Applicants and subrecipients shall be provided adequate and timely information to enable them to be meaningfully involved in important decisions at various stages of the program, including at least:

- The determination of needs
- The review of proposed activities
- The review of program performance

## Risk Assessment

IEDA will conduct a risk-based assessment annually per CDBG-DR contract. While each activity will be monitored on-site at least once during the life of the grant, the risk-based assessment will assist project managers in determining the timing and frequency of documented monitoring.



The risk-based assessment will be conducted through IowaGrants. This form will be filled out once per year by the project manager, and based on the outcome score, the project manager will determine when the next monitoring is required. Per 200.331(b), IEDA will evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and terms and conditions of the subaward for the purposes of determining the appropriate level of monitoring. The risk-based assessment will include:

- Financial Risk- how large is the grant
- Submitted Draws- are claims on schedule as outlined in contract
- Program Management/Capacity – is the administrator familiar with CDBG and attended trainings
- Program Income- has the contract generated program income
- QPR Tracking- is the program reasonably on track

## Monitoring

Upon the expenditure of at least 50% of the CDBG-DR award by a subrecipient, IEDA will schedule a full monitoring of the project. The project manager will email the subrecipient and grant administrator to schedule the visit. Monitoring visit information and forms will be made available and completed in IowaGrants. The project manager will instruct grant administrators to provide any additional information identified as needed during a monitoring visit.

After the monitoring, a visit report will be uploaded to IowaGrants and sent to both the subrecipient and grant administrator.

**IEDA reserves the right to monitor the project at any point in time** based on its assessment of project risk or other considerations.

## Closeout Documents

The following documents will be required to be submitted before closeout of the project:

- Section 3 compliance forms
- Addresses for all project locations

## Document Retention

The subrecipient must retain **all documentation** of this project for three years after the entire 2020 CDBG-DR grant between IEDA and HUD is closed. IEDA grant closeout with HUD is anticipated in 2029. Subrecipients should expect to retain all documentation **through at least 2032**. IEDA will notify all subrecipients when documentation retention is no longer required. Subrecipients may also contact IEDA's Community Development and/or Disaster Recovery divisions to inquire about document retention times for 2020 CDBG-DR.

