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## STATE OF CONNECTICUT DEPARTMENT OF HOUSING

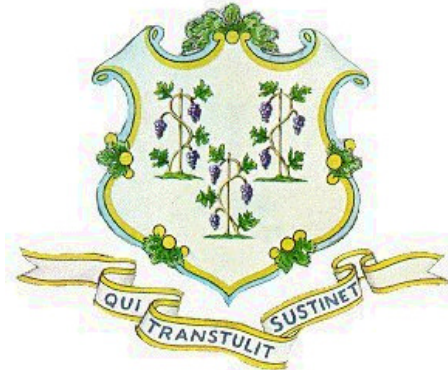


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Commissioner

# Community Development Block Grant – National Disaster Resilience (CDBG-NDR)

## CDBG-NDR Projects

## Policies and Procedures



### Revision # 3

Issued February 5, 2020

*The policies stated herein are current as of February 5, 2020 and provide general guidance for the operation of the CDBG-NDR projects. All project policies and guidelines will be reviewed periodically and will be updated as required. Please visit our website*

*<https://portal.ct.gov/DOH/DOH/Sandy-Pages/Sandy-Programs/NDRC> to ensure that you have the latest version of the program policies and guidelines.*

# TABLE OF CONTENTS

## Table of Contents

I.	INTRODUCTION .....	1
II.	LEAD AGENCY .....	2
III.	PROJECT OBJECTIVES.....	3
IV.	THRESHOLD REQUIREMENTS .....	3
A.	National Objective .....	4
B.	Resilience Incorporated .....	4
C.	Furthering Fair Housing.....	4
V.	COMPLIANCE AND MONITORING.....	5
A.	Project Documents.....	5
B.	Financial Documents.....	5
C.	Risk Management .....	6
VI.	ACTION PLAN AMENDMENTS.....	6
A.	Substantial Amendments to the Action Plan.....	6
B.	Nonsubstantial Amendments to the Action Plan .....	7
VII.	ENVIRONMENTAL REVIEW .....	7
A.	Roles and Responsibilities.....	7
B.	Environmental Review – Assessing Level of Review .....	7
C.	Combined State and Federal Environmental Impact Statement Process.....	8
D.	Environmental Review Record.....	9
VIII.	MEMORANDUM OF AGREEMENT .....	9
IX.	PROCUREMENT .....	10
X.	DAVIS-BACON ACT.....	10
XI.	CONTRACTS .....	10
A.	Design and Engineering.....	10
B.	Program Management.....	11
XII.	CONSTRUCTION PROCEDURE.....	11
A.	Contractor Selection and Procurement Requirements .....	11
B.	Section 3 Requirements (24 CFR Part 135).....	12
C.	Work Write Up/Property Inspections.....	12

D.	Pre-Construction Conference .....	12
E.	Construction Activities .....	12
XIII.	PROGRAM INCOME .....	13
XIV.	PREVENTION OF DUPLICATION OF BENEFITS.....	14
XV.	PROCEDURES TO ENSURE TIMELY EXPENDITURES.....	15
XVI.	PROCEDURE TO MAINTAIN A COMPREHENSIVE WEBSITE.....	15
XVII.	PROCEDURES TO DETECT FRAUD, WASTE, AND ABUSE OF FUNDS .....	15
XVIII.	OUTCOME VALUES .....	16
XIX.	LONG TERM COMMITMENT .....	17
XX.	LEVERAGE .....	18
XXI.	PROJECT CLOSEOUT.....	18
XXII.	EXHIBIT I .....	20

## I. INTRODUCTION

On Monday, October 29, 2012, Hurricane Sandy struck near Atlantic City, New Jersey, as a post tropical cyclone. The storm created a significant tidal surge from the Mid-Atlantic region to New England. After landfall, Sandy headed north by northwest bringing high winds, rain, and storm surge to coastal areas of Connecticut. The immediate effects of Sandy in the Connecticut included the deaths of six residents and widespread wind and flood damage to homes, businesses, infrastructure, and public facilities. Approximately 650,000 residents lost power and many residents did not have power for more than a week.

One of the hardest hit areas in Connecticut was the City of Bridgeport's South End. The City of Bridgeport is the most densely populated, ethnically diverse, and socially vulnerable city in Connecticut, and provides much-needed affordable housing for the area. Situated on the coast of Long Island Sound, Bridgeport is vulnerable to sea level rise, which would inundate power plants, wastewater treatment plants, hospitals, a financial center, sports and entertainment facilities, and a university.

By 2100, it is predicted that over half of Bridgeport could flood regularly. Transportation infrastructure, including the regional rail from Boston to New York City and the busy interstate highway, could be chronically disrupted.

In response to the extraordinary destruction caused by Hurricane Sandy, Congress passed and the President signed into law The Disaster Relief Appropriations Act; also known as Public Law 113-2 (the "Act"), which, among other things, appropriated approximately \$60 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act. A significant portion of those funds was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG-DR Program") to be administered by the United States Department of Housing and Urban Development ("HUD").

The State of Connecticut (State) has been awarded a Community Development Block Grant – National Disaster Resilience (CDBG-NDR) grant through the National Disaster Resilience (NDR) competition in the amount of \$54,277,359. These funds will be used for administration of the grant and six activities: three related infrastructure projects in the City of Bridgeport, two planning activities in the City of Bridgeport, and the planning activity Connecticut Connections Coastal Resilience Plan covering Fairfield and New Haven Counties (Table 1).

The CDBG-NDR Action Plan details how the State plans to spend the \$54,277,359 million grant. The Action Plan, including any amendments, describes how the State will use this funding to implement the above projects and plans.

All activities associated with the grant will be completed by September 30, 2022.

This policies and procedures manual is designed to provide information for implementing the Connecticut Community Development Block Grant National Disaster Resilience - (CDBG-NDR) projects. It does not describe a program to select activities to assist since the projects were already developed and defined through the National Disaster Resilience Competition Phase I and Phase II application process

and updated in the Action Plan upon award of the grant to the State. The CDBG-NDR program is funded through the U.S. Department of Housing and Urban Development (HUD). The Connecticut Department of Housing (CTDOH) administers the program for the State. All HUD regulations as well as CTDOH regulations apply to the grants.

Activity Title	Grantee Activity Number	Activity Type
Administration	NDR-ADMIN	Administration
Eastern Berm	NDR-BPT-Berm	Dike/dams/stream-river bank repairs
University Avenue	NDR-BPT Energy	Construction/reconstruction of streets
Resilience Center	NDR-BPT-ResCtr	Rehabilitation/reconstruction of public facilities
District Energy Feasibility	NDR-BPT-Energy	Planning
Floodplain Design Guidelines	NDR-BPT-Guide	Planning
Connecticut Connections Coastal Resilience Plan	NDR-CCCRP-Coastal	Planning

Table 1. Funded NDR projects as summarized in the Action Plan.

## II. LEAD AGENCY

The State, acting through the Department of Housing (DOH) as the lead agency for the administration of the CDBG-NDR funding, will administer and implement the activities primarily through internal staff and third-party contractors.

If DOH retains third-party contractors it will vary by activity category and will include, but is not limited to:

1. Administrative Support
2. Architectural/Engineering;
3. Environmental Review services (including historic preservation review);
4. Legal services;
5. Construction Management services; and
6. General Contracting (including subcontracting).

DOH staff are responsible for complying with the significant federal requirements related to financial management and control, programmatic compliance and monitoring, affirmative fair housing, the prevention of fraud, waste, and abuse. These staff members will be responsible for administering all aspects of the State’s CDBG-NDR Program, including oversight of all contractors, working with individual applicants, processing the necessary payments, tracking projects and program activities, reporting in the federal Disaster Recovery Grants Administration (DRGR) system, as well as coordinating the activities of

other state agencies in relation to the NDR projects. The CTDOH Director of Resilience will serve as the CTDOH Program Manager for the purposes of the CDBG-NDR projects.

In addition, the Internal Auditor for CTDOH, who reports directly to the Office of the Commissioner, is responsible for ensuring that procedures to detect fraud, waste and abuse are both adopted and implemented in accordance with federal requirements and consistent with the Statement on Auditing Standards No. 99 (SAS99) and the standards established for the International Standards for the Professional Practice of Internal Auditing as promulgated by the Institute of Internal Auditors (IIA). The CTDOH staff will also oversee the extensive federal requirements associated with programmatic compliance and monitoring. The CTDOH will be responsible for ensuring the overall administration of the Funding complies with all applicable federal requirements. CTDOH will also be responsible for monitoring all DOH contractors and service providers as detailed in this CDBG-NDR Policies and Procedures manual.

### III. PROJECT OBJECTIVES

In Bridgeport, CDBG-NDR funds will be used to construct three projects and complete two studies. The state will construct a raised University Avenue to provide dry egress for multiple properties that are receiving state support to remediate brownfields and redevelop as mixed-use, a berm that will encircle the eastern area of the South End and significantly reduce flood risk to a large area that includes power generation and substations as well as affordable and historic housing and future transit-oriented development opportunities, and a resilience design center to act as a community hub for resilience activities. The state will study the potential to leverage the regional energy generation and distribution infrastructure located in the South End of Bridgeport for neighborhood benefit and the opportunities for redevelopment in the floodplain in a responsible and resilient manner.

Across Fairfield and New Haven Counties, CDBG-NDR funds will be used to develop the regional coastal resilience plan, Connecticut Connections. This plan will be based on coastal and riverine modeling to better understand current and future flood risk at the watershed scale. Using this information the plan will implement the state's resilience vision of establishing coastal communities where structures and critical infrastructure in the flood zone are adapted to withstand occasional flooding and protected by healthy buffering ecosystems, where critical services, infrastructure and transport hubs are located on safer, higher ground, and where strong connections exist between the two. Special emphasis will be given to addressing economic impacts of a changing climate and coast with sea level rise and to policy strategies including the development of municipal codes, ordinance and regulations. The plan will include implementable resilience projects for future state and federal funding opportunities. The plan can serve as a blueprint for a statewide resilience roadmap to be implemented by the State Agencies Fostering Resilience Council.

### IV. THRESHOLD REQUIREMENTS

In the Phase 2 NOFA for the National Disaster Resilience Competition (FR-5800-N-29A2) all applicants had to meet the following threshold requirements: Eligible Applicant, Eligible County,

Most impacted and distressed target area, Eligible Activity, Resilience incorporated, Meet a national objective (or be not subject to the test), Overall benefit (at least 50% of funds requested must benefit low and moderate-income persons), Tie-back to the Qualifying Disaster, Benefit-cost analysis justifying the costs, and submission of CDBG-NDR Applicant Certifications. All threshold requirements were met and documented in the Phase I and Phase II applications and Action Plan filed in DRGR once the grant was awarded.

### **A. National Objective**

The three funded infrastructure activities: University Avenue, Resilience Center and Earthen Berm meet the national objective of benefitting low and moderate-income (LMI) persons. LMI persons are defined for the purposes of the CDBG-NDR projects as persons and families whose income does not exceed 80% of the area median income (“AMI”), as determined by HUD. The national objective is met through verification using census tract data of the location of the projects in an LMI area. This information is in the Action Plan.

The planning and administration activities: Bridgeport South End Design Guidelines, Bridgeport South End District Energy Feasibility, Connecticut Connections Coastal Resilience Plan, and the State Agencies Fostering Resilience (SAFR) program, which includes both administration and planning expenses are exempt from meeting a national objective. However, the Bridgeport South End Design Guidelines and Bridgeport South End District Energy Feasibility plans are focused on neighborhoods in Bridgeport that have greater than 50% low and moderate-income persons.

### **B. Resilience Incorporated**

The Resilience Incorporated Threshold Requirement was fulfilled through demonstrating how each activity enhanced the resilience of the area of unmet need in the applications. It also required Long Term Commitments by the State of Connecticut to increase resilience of the locality, region or state. The Long Term Commitments were documents in DRGR and were all completed as of January 31, 2017.

### **C. Furthering Fair Housing**

The activities being carried out under NDR contribute to the State’s efforts to affirmatively further fair housing by: 1) enabling the continued safe habitation of existing affordable housing opportunities within walking distance of jobs, public transportation and amenities; 2) mitigating both present and future flood related issues of both publicly and privately owned properties targeted for future multifamily and economic development; and 3) preserving and increasing the potential for affordable homeownership opportunities in this target neighborhood. In addition, the NDR activities will contribute to addressing the regional need to affirmatively further fair housing by encouraging both housing and economic development in low flood risk and transit-oriented neighborhoods across Fairfield and New Haven counties. Many of these NDR activities address specific action steps found in the State of Connecticut Analysis of Impediments to Fair Housing Choice, which is compliant with and supports the federal obligation to affirmatively further fair housing. These action steps include: 1) encourage the creation and rehabilitation of affordable housing in a variety of locations; 2) collaborate with other state agencies to affirmative further fair housing; and 3) ensure state and local planning documents affirmatively further fair housing.

## V. COMPLIANCE AND MONITORING

### A. Project Documents

The CTDOH is responsible for the project progress and contract compliance. The CTDOH will document compliance with all applicable regulations of the CDBG-NDR program. In support of the program management and compliance, the State has procured the services of a consulting firm to serve as supplemental program manager in support of CTDOH. The program management consultant manages the electronic document system whereby project deliverables (reports, design drawings, meeting minutes, ERR documents, etc.) are submitted by contractors or consultants. The program management consultant serves as an initial reviewer to ensure project deliverables are submitted in accordance with contract requirements. The CTDOH Program Manager reviews and approves all documents submitted through the electronic system and provides any comments or changes needed to project deliverables. Quarterly project narratives are also submitted through the electronic document system, reviewed by the program management consultant before sending to the CTDOH Program Manager for review and approval. The CTDOH Program Manager prepares the final project narrative for the QPR reports submitted through DRGR. Review and approval workflows of project documents are in Exhibit I.

### B. Financial Documents

The CTDOH Program Manager and the CTDOH financial team monitor financial documents and ensure compliance with CDBG-NDR guidance through the review, process and approval of all invoices, payments and drawdowns through the DRGR system and the State's financial management system, CORE-CT. Workflows for review and approval of financial documents are in Exhibit I.

Records will be maintained for a period of not less than five years after the closeout of the grant and will provide a historical account of the project for examination and review by the CTDOH, HUD, and auditors. The CTDOH has one complete set of files on site at the state. Documents will be stored electronically and are regularly backed up and are readily available to CTDOH staff or any other auditors for review.

Core-CT is the name given to Connecticut's HRMS (Human Resource Management System) / Financials system. The State chose PeopleSoft (now Oracle/PeopleSoft) as the official Enterprise Reporting System (ERP) for Connecticut. Core-CT staff is divided into seven teams: HRMS, Financials, EPM-Ad-Hoc Reporting, Security, Technical, Communications, and Level 1 Help Desk. Core-CT can be described as being made up of two major pieces. 1. PeopleTools, (analogous to the operating system of a computer (e.g., Windows, MacOS)) 2. Applications (run on PeopleTools) a. Human Capital Management (HCM), or more popularly known as Human Resource Management System (HRMS), for payroll, time and labor, benefits, and human resources b. Financials for general ledger, purchasing, payables, receivables c. Enterprise Performance Management (EPM) for ad hoc reporting and Business Intelligence (BI). This system works in concert with the State Accounting Manual to ensure that accounting records contain information on grant awards, authorizations, obligations, unobligated balances, assets, liabilities, expenditures, program income (N/A) and interest (N/A).

Core-CT: <http://www.core-ct.state.ct.us/financials/>  
See list of modules

State Accounting Manual <http://www.osc.ct.gov/StateAcct/sam/policies/index.htm>  
See Table of Contents for specific topics



Additional information on the State of Connecticut's financial controls used by the CTDOH can be found in the P.L. 113-2 Certification Checklist and supplemental attachment submitted to HUD prior to the CDBG-NDR grant award.

### **C. Risk Management**

The program management consultant will assist the CTDOH with monitoring risks that may impact the CDBG-NDR projects' success. The CTDOH will employ a process of identifying risks, quantifying impacts, and developing a response. The program management consultant will provide the CTDOH with mitigation analysis, control strategies and monitoring measures to manage risks. Previously identified risks will be updated and new risks will be identified as the project and schedule progress.

## **VI. ACTION PLAN AMENDMENTS**

Over the lifetime of this grant it may become necessary to make minor changes to the CTDOH Action Plan. The minor amendments may include changes to plans and specifications through the design process. Any minor change will not affect outcome values.

### **A. Substantial Amendments to the Action Plan**

A Substantial Amendment to the Action Plan shall be defined as:

- Any change to the funded portions of the application that HUD determines, based generally on the guidelines of the NOFA (as adjusted for HUD's scaling and scoping of the award), would present a significant change to the grantee's capacity to carry out the grant (including loss of a partner without addressing lost capacity through replacement or contingency plan identified in the application)
- Any change to the funded portions of the application that HUD determines, based generally on the guidelines of the NOFA (as adjusted for HUD's scaling and scoping of the award), would undermine the grantee's soundness of approach (including the benefit cost analysis)
- Any change to the Most Impacted and Distressed target area(s) (a revised area must meet Most Impacted and Distressed threshold requirements in the NOFA, including Appendix G to the NOFA)
- Any change in program benefit, beneficiaries, or eligibility criteria and the allocation or reallocation of more than 10 percent of the grant award
- Any change to the leverage that was pledged and approved in the grantee's grant agreement
- The addition or deletion of an eligible activity

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. CTDOH will follow guidance in NDR Grants Waiver Notice - 82 FR 36812 - August 7, 2017 (<https://www.govinfo.gov/content/pkg/FR-2017-08-07/pdf/2017-16411.pdf>) for a substantial amendment.

CTDOH does not anticipate undertaking a substantial amendment to the Action Plan.

## **B. Nonsubstantial Amendments to the Action Plan**

Amendments that do not fall within the definition of substantial amendment are referred to as 'nonsubstantial amendments.' CTDOH expects that nonsubstantial amendments are likely to be needed over the course of the grant. CTDOH will notify HUD in writing at least 10 business days prior to the effective date of the nonsubstantial amendment. The CTDOH will identify the amendment within the context of the current Action Plan and submit it to HUD in a letter. The letter will include a section that identifies exactly what content is being added, deleted, or changed, and whether the CTDOH believes that the proposed amendment would result in a significant change to its capacity or soundness of approach. If the amendment includes changes to funding, then a table illustrating where funds are coming from and where they are moving will be provided to HUD. A revised budget allocation table will be provided that reflects the entirety of all funds, as amended. An amended version of the Action Plan will be provided in its entirety for viewing by the public on the CTDOH NDR website. All amendments to the Action Plan (substantial and nonsubstantial) will be numbered sequentially and posted on the CTDOH NDR website. HUD will acknowledge receipt of a proposed amendment via email or letter within 5 business days of receipt. HUD may seek additional information from the grantee to determine whether a proposed amendment is a substantial amendment.

## **VII. ENVIRONMENTAL REVIEW**

All activities funded with CDBG-DR funds must have had an environmental review (ER) and receive clearance to expend funds on the activity. The regulations for meeting HUD's environmental review requirements can be found at 24 CFR Part 58. The State reserves the right to retain an Environmental Contractor to assist with the completion of this requirement. Contractors will be selected through an RFQ process.

### **A. Roles and Responsibilities**

CTDOH will follow all Local, State and Federal requirements as part of the project's implementation. The CTDOH is the recipient of the U.S. Department of Housing and Urban Development (HUD) disaster recover grant funding and is the "Responsible Entity," as that term is defined by HUD regulations at 24 Code of Federal Regulations (CFR) Part 58.2(a)(7)(i).

The Commissioner of the CTDOH delegated authority for the Certifying Officer for Environmental Review to Hermia Delaire (Hermia.Delaire@ct.gov). In the event that Hermia Delaire is absent Miguel Rivera (Rivera.Miguel@ct.gov) will serve as the Certifying Officer for CDBG-NDR.

### **B. Environmental Review – Assessing Level of Review**

The National Environmental Policy Act (NEPA) requires all federal agencies to adopt a systematic approach to assessing potential environmental impacts of agency actions. Key considerations include:

- Decisions should be based on an understanding of environmental consequences
- Information should be made available to the public and government agencies before decisions are made
- Evaluation should include reasonable alternatives

- Chosen action should avoid or minimize adverse environmental impacts

HUD’s procedures for state agencies that oversee HUD grants, such as the CDBG-NDR grants, are spelled out at 24 CFR 58. For each funded project activity the CTDOH Certifying Officer assesses whether the project activity is “Exempt” and requires only documentation of the determination of exemption (left-most path on the flow chart), “Categorically Excluded” projects that require completion of a statutory checklist showing that no further review is required or must undergo a more detailed “Environmental Assessment” in order to determine whether additional review is required and if the projects need a full Environmental Impact Statement (EIS). The assessment of each project is below.

Grantee Activity Number	Activity Type	Review
NDR-ADMIN	Administration	Exemption Determination
NDR-BPT-Berm	Dike/dams/stream-river bank repairs	NEPA EIS
NDR-BPT Energy	Construction/reconstruction of streets	NEPA EIS
NDR-BPT-ResCtr	Rehabilitation/reconstruction of public facilities	NEPA EIS
NDR-BPT-Energy	Planning	Exemption Determination
NDR-BPT-Guide	Planning	Exemption Determination
NDR-CCCRP-Coastal	Planning	Exemption Determination

In consultation with HUD it was determined at the time of the award of the CDBG-NDR grant to the State of Connecticut that the non-exempted activities associated with the Earthen Berm, University Avenue, and Resilience Center would require an EIS, which is a more comprehensive level of review than the Environmental Assessment, therefore no EA checklists were prepared for these activities.

Environmental review was performed for all planning and administration funds as exempted activities. A portion of funds allocated to the infrastructure projects in the Action Plan are being used to fund the environmental studies, inspections and testing of properties for hazards or defects, and engineering and design costs for the infrastructure projects. Although they are in support of the infrastructure projects, they are exempt activities from environmental review. Certification of all of the exemptions will be performed by the CTDOH Certifying Officer and stored in the Environmental Review Record (ERR) before drawdown of funds for each activity. A 58.6 checklist was performed for all activities. All environmental reviews will be performed prior to drawdown of funds by the CTDOH.

### C. Combined State and Federal Environmental Impact Statement Process

The Connecticut Environmental Policy Act establishes environmental policy for the State of Connecticut and requires an Environmental Impact Evaluation (EIE) for any state action that could affect the natural environment. In addition, the CDBG-NDR infrastructure projects are considered a “major federal action significantly affecting the quality of the human environment”; therefore, it must comply with the requirements of the National Environmental Policy Act of 1969 (NEPA). As such, the EIE will jointly serve as an EIS and will meet NEPA requirements.

The CTDOH will undergo a scoping process for the infrastructure projects with a scoping notice publishing in the Connecticut Council on Environmental Quality website, a public hearing, and 30-day public comment period. A Notice of Intent to prepare an EIS will be published in the Federal Register. The infrastructure projects will require a full EIE/EIS. A Draft EIE/EIS will be published in the Federal Register with notification in the Connecticut CEQ Environmental Monitor. A public hearing will be held with a 45-day public comment period. CEPA and NEPA public comment periods will be concurrent. At the close of the public comment period CTDOH will review and respond to all public comments. The FEIS will be filed with EPA and HUD for noticing in the Federal Register. Noticing of the final EIS begins the minimum 30-day "wait period," in which agencies are required to wait 30 days before making a final decision on a proposed action.

The EIS process ends with the issuance of the Record of Decision (ROD) by the CTDOH. The ROD will explain the agency's decision, describe the alternatives the agency considered, and discuss the agency's plans for mitigation and monitoring, if necessary.

Following the ROD, a Notice of Intent (NOI) and Request for Release of Funds will be published (7-day comment period) or posted (10-day comment period).

CTDOH submits the RROF/Certification to HUD [(form 7015.16)]. Once the form is submitted a 15-day objection period is held. If no objections are received or objections are resolved, CTDOH releases the funds.

#### **D. Environmental Review Record**

The CTDOH will maintain the Environmental Review Record for all projects (§58.38). The ERR shall be available for public review. The ERR will contain all the environmental review documents, public notices, written determinations, environmental findings pertaining to decision-making and actions related to individual projects.

### **VIII. MEMORANDUM OF AGREEMENT**

The State of Connecticut Department of Housing is the granting agency under this grant and is responsible for the oversight of all the projects. CTDOH has a Memorandum of Agreement (MOA) with the University of Connecticut (UCONN), a State of Connecticut non-profit institution of higher education, that will lead the planning activity NDR-CCCRP Connecticut Connections Coastal Resilience Plan. Under the MOA with CTDOH, UCONN submits invoices for costs incurred by the end of each quarter (March 31, June 30, September 30, and December 31) and follows the same workflow and procedure as the Consultant Invoice Submission (Exhibit I). UCONN submits quarterly narrative reports on project progress and status, including the number of meetings held and the number of people attending each meeting, relating to the activity within 14 days following the end of each quarter (March 31, June 30, September 30, and December 31) to the CTDOH Program Manager for review. The CTDOH Program Manager includes a summary of the UCONN quarterly narrative report in the QPR submitted through DRGR at the end of each quarter. It is understood that the Connecticut Connections Coastal Resilience Plan is Categorically Excluded from environmental review and will not involve construction activities which will make them exempt from Davis Bacon reporting, however all other aspects of the project will

comply with all federal laws governing this grant. CTDOH will provide guidance and oversight to UCONN on their planning activity.

## **IX. PROCUREMENT**

The state government contracting process and procedures must be open, honest, fair and accessible at all times. The Department of Administrative Services (DAS) Procurement Division encourages state agencies to contact them at any time with questions about procurement policies, procedures and programs. The manual, The State Procurement Contracting Manual, serves as the guide for all executive branch agencies of the State of Connecticut with regard to all purchasing of goods and services. Understanding the growing demand for current procurement information, this manual is designed to give Connecticut state agencies the latest information about procurement topics to assist them in performing their purchasing functions in a legal and ethical manner. It may be accessed at the following web address: <http://das.ct.gov/cr1.aspx?page=15>. The procedures detailed in the State's Procurement Contracting Manual procedures are equivalent to or exceed the procurement standards as set forth in 24 CFR 85.36. The Department has adopted these procurement guidelines in accordance with those requirements.

## **X. DAVIS-BACON ACT**

Infrastructure contracts in excess of \$2,000 must comply with Davis-Bacon and Related Acts (DBRA). CTDOH is responsible for enforcement of the DBRA requirements, such as on-site interview of workers, review of contractor's payrolls, and conducting a pre-construction conference.

The requirements of the Davis-Bacon Act and the procedures that must be followed to prove compliance are complex. The CTDOH will follow guidance in the following HUD handbooks:

- Making Davis-Bacon Work, A Practical Guide for States, Indian Tribes and Local Agencies
- A Contractor's Guide to Davis-Bacon Wage Requirements and Certified Payroll Reports
- Labor Standards Administration and Enforcement Guidelines for HUD Program Participants.

Failure to comply with the requirements of the Davis-Bacon Act or an inability to prove compliance is a serious matter and can result in a forfeiture of all Federal funds spent on the project.

## **XI. CONTRACTS**

### **A. Design and Engineering**

The CTDOH will issue an RFQ to solicit proposals from design, architecture, engineering, planning, environmental review, construction management, and outreach teams of firms as a consultant to

perform the tasks necessary to complete the feasibility study and alternatives analysis, environmental impact statement (EIS), and preliminary design and engineering to schematic design level at approximately 30 percent (30%) for the three (3) CDBG-NDR infrastructure projects. The Consultant shall conduct a stakeholder engagement process concerning these projects that goes well beyond the basic requirements and builds on the successful outreach strategy completed thus far for the planning stage of the RBD project. Based on the solicitation, DOH also reserves the right to award additional tasks including final design and engineering, preparation of bid specifications and procurement documents for construction, and construction administration services for both the CDBG-NDR-funded and CDBG-DR Rebuild by Design funded projects (see [https://portal.ct.gov/DOH/DOH/Sandy-Pages/Homepage-Grid/CDBG-DR-Action-Plan \*Substantial Amendment - 5 Rebuild by Design\*](https://portal.ct.gov/DOH/DOH/Sandy-Pages/Homepage-Grid/CDBG-DR-Action-Plan%20Substantial%20Amendment%20-%205%20Rebuild%20by%20Design)). It is the intent of the CTDOH to award the contract to the highest ranked bidder for the purposes of completing the scope of work. CTDOH reserves the right to engage the second highest rank bidder for the purposes of peer review of the work conducted by the highest ranked bidder. CTDOH also reserves the right to engage either the highest ranked or the second highest rank bidder for possible additional scope including energy study, final design, bid document preparation, and/or construction administration services. CTDOH reserves the right to reject all bidders and reissue the RFQ at a later date.

For the purposes of the above tasks, a contract was awarded in 2017 to WSP USA Inc. as the prime consultant and GEI Consultant Inc. as the reviewer. Contracts are posted on the CTDOH NDR website (<https://portal.ct.gov/DOH/DOH/Sandy-Pages/NDR-Contracts>).

## **B. Program Management**

The CTDOH is the lead agency and takes responsibility for all compliance and financial management. The CTDOH will issue an RFQ to solicit proposals from a program management firm/organization as a consultant to support and advise State staff in regulatory issues, program/grant management, program administration, finance, compliance, and other tasks as identified in the scope of services.

For the purposes of the above tasks, a contract was awarded in 2018 to Stantec Consulting Services, Inc. Contracts are posted on the CTDOH CDBG-NDR website (<https://portal.ct.gov/DOH/DOH/Sandy-Pages/NDR-Contracts>).

## **XII. CONSTRUCTION PROCEDURE**

The construction of the three CDBG-NDR infrastructure projects will occur after permits, approvals, and any easements are obtained and a Request for Release of Funds has been approved.

### **A. Contractor Selection and Procurement Requirements**

1. The design and engineering consultant will compile contract documents for bidding by the CTDOH. The CTDOH will prepare an RFQ and manage the bidding process. The CTDOH has adopted the Connecticut State Procurement Contracting Manual, which is equivalent to or exceeds the procurement standards as set forth in 24 CFR 85.36.
2. Once submitted, bids will be reviewed and the contractor selected in order to ensure compliance with CTDOH and HUD regulations and policies;

3. Following contractor selection, a review of the proposed schedule and budgets against the project estimate and master schedule will be done in order to ensure that project activities will meet scheduled deadlines.

#### **B. Section 3 Requirements (24 CFR Part 135)**

The CDBG-NDR projects will comply with Section 3 of the Housing and Urban Development Act of 1968. The State will adopt at a minimum the HUD base standards for the hiring of Section 3 eligible participants. All executed contracts will require at a minimum the contractors meet the current Section 3 requirements. All contracts will require a monthly report for Section 3 hires and will stipulate monitoring procedures to ensure compliance with Section 3 reporting.

#### **C. Work Write Up/Property Inspections**

The work write-up constitutes the work requirements in order to complete each project. Items in the write-ups are detailed including methods of application and standards for materials. No changes in the scope of work write-up will be considered valid without an approved change order.

Questions concerning the work-write-ups should be referred to the CTDOH Program Manager. Only materials conforming to the requirements of the write-up shall be used in the work. Contractors have an obligation to perform all the work strictly in accordance with the requirements of the work write-up. The contractor will perform all work in conformance with applicable local codes and requirements whether or not they are described in the work write-up. Whenever it appears that materials furnished and work performed by the contractor fail to fulfill the requirement of the contract, the CTDOH Program Manager shall call discrepancies to the attention of the contractor to resolve in conformance with the specifications and to the satisfaction of the owner work.

#### **D. Pre-Construction Conference**

Prior to the start of work, the CTDOH Program Manager and CTDOH consultants will schedule a preconstruction conference with the contractor. At this conference, the starting date and the completion date for work will be firmly established, the sequence of work will be reviewed, and any special conditions clarified.

#### **E. Construction Activities**

The CTDOH will oversee all construction activities with support from the program management consultant. Under the direction of the CTDOH Program Manager, the program management consultant will:

- Attend weekly project team conference calls and monthly update meetings during the construction phases.
- Review and evaluate contractor claims for any increases in contract pricing or schedule alteration and provide recommendations to CTDOH regarding any claims. Monitor and document any contractor delays and major events and their impact on project schedules and costs.
- Review and verify submittal/response Request for Information (“RFI”) log which will be created and managed by CTDOHs’ contractors.

- Review contractors' draft applications for payment for consistency with the respective contracts and recommend suggested changes to the design engineer, resident engineer or other firm reviewing the payment requisitions. The PM consultant will finalize the application for CTDOH Program Manager review and approval. The CTDOH Program Manager will submit approved payment request to the CTDOH Finance for payment (see Exhibit I for invoice and payment workflow).
- Prepare and submit quarterly budget tracking reports for each project throughout the construction period and include projections for the remainder of the project. Prepare monthly executive summaries of the overall project status including cost, schedule, and other information and submit to the CTDOH for review and approval.
- Review requests for substantial completion and provide recommendations to the CTDOH for their review and approval.
- Monitor and document the contractors' work for compliance with the project schedules and CTDOH and HUD requirements and submit to CTDOH for review and approval. Under the direction of the CTDOH, facilitate resolution of non-compliance with the approved contract documents.
- Identify any cost control measures and coordinate with the design engineer and contractor to review proposed cost control measures and submit to CTDOH for review and approval.

### XIII. PROGRAM INCOME

DOH does not intend to fund revenue generating activities as part of its administration of the CDBG-NDR funding.

In the event that any program income is nevertheless generated in connection with DOH's administration of the CDBG-NDR funding, such funds will become program income in the State's annual CDBG-Small Cities program and DOH will apply such program income to its annual CDBG-Small Cities allocation and award the funds based on its then current method of distribution as described in the applicable Action Plan. Additionally, DOH will withhold five percent of such program income to offset DOH's CDBG-Small Cities administration cost and any other eligible administrative expenses. Program Income that has been derived from the CDBG-NDR activities may be used only for eligible Small Cities Program activities and in accordance with the provisions of Title I of the Housing and Community Development Act of 1974, as amended, 24 CFR Part 570.489(e), and the program income guidelines of the Small Cities Grant Management Manual. Program Income is defined as gross income received by a recipient (or sub recipient) that has been directly generated from the use of Small Cities Program funds, and includes the following:

1. Payments of principal and interest (including late fees) on loans made using CDBG-NDR funds. For any loan that was partially funded with CDBG-NDR funds, program income is only the prorated portion of the income that reflects the actual percentage of CDBG-NDR participation. For example, if a loan was made with 50% local funds and 50% CDBG-NDR funds and a \$100 payment is received, \$50 would be CDBG-NDR program income;
2. Interest earned on program income pending disposition of same, but excluding interest earned on funds held in a revolving fund account;
3. Net proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG-NDR Program funds;



4. Proceeds from the disposition of equipment purchased with CDBG-NDR Program funds;
5. Gross income from the use or rental of real or personal property acquired by a State, a unit of general local government; a tribe or sub recipient of a State or a sub recipient of a unit of general local government or tribe with CDBG-NDR Program funds; less the costs incidental to the generation of the income (i.e. net income);
6. Net income from the use or rental of real property owned by the a State, a unit of general local government, or tribe or a sub recipient of a unit of general local government or State or tribe, that was constructed or improved with CDBG-NDR Program funds; less the costs incidental to the generation of the income;
7. Proceeds from the sale of liens made with CDBG-NDR Program funds;
8. Proceeds from the sale of obligations secured by liens made with CDBG-NDR Program funds;
9. Funds collected through special assessments made against properties owned and occupied by households not low-and moderate-income, where the special assessments are used to recover all or part of the CDBG-NDR Program portion of a public improvement; and
10. Gross income paid to a State, LG, tribe, or paid to a sub recipient thereof from the ownership interest in a for-profit entity in which the income is returned for the provision of CDBG-NDR assistance.

#### XIV. PREVENTION OF DUPLICATION OF BENEFITS

HUD has instituted specific reporting, written procedures, monitoring, and internal audit requirements for each grantee to ensure compliance with program rules for CDBG disaster recovery awards, including rules related to prevention of fraud, abuse, and duplication of benefits (DOB). Two authorities form the foundation of duplication of benefit inquiries—the Stafford Act and applicable “necessary and reasonable cost principles in 24 CFR part 570 and in OMB Cost Circulars (codified in title 2 of the Code of Federal Regulations). Supplemental appropriations statutes often reinforce and supplement these authorities.

**The Stafford Act.** The Stafford Act directs administrators of Federal assistance to ensure that no “person, business concern or other entity” will receive duplicative assistance and imposes liability “to the extent such assistance duplicates benefits available to the person for the same purpose from another source.” 42 U.S.C. 5155(a). Specifically, section 312 of the Stafford Act prohibits any person, business concern, or other entity from receiving “any part of such loss as to which he has received financial assistance under any other program or from insurance or any other source.” 42 U.S.C. 5155(a). Duplication occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose. The amount of the duplication is the amount of assistance provided in excess of need. The Stafford Act requires a fact specific inquiry into assistance received by each person, household, or entity. A grantee may not make a blanket determination that a duplication of benefits does not exist for all beneficiaries or recipients under a disaster recovery program. As a result, all disaster recovery funds must be governed by policies and procedures to prevent duplication of benefits.

The projects under the National Disaster Resilience program are all conducted by the State of Connecticut. There are no applicants to the program. It is not anticipated that any projects in the CDBG-NDR will result in a duplication of benefits.

## XV. PROCEDURES TO ENSURE TIMELY EXPENDITURES

Upon satisfactory work by contractors to the State of Connecticut, invoices are submitted to the State on a monthly basis by contractors. Payments are made as work progresses. Payments are processed according to the workflow described in Exhibit I.

## XVI. PROCEDURE TO MAINTAIN A COMPREHENSIVE WEBSITE

As required by the Disaster Relief Appropriations Act, 2013 (Public Law 113-2), the Connecticut Department of Housing has a separate page on its website dedicated to the NDR funds. DOH ensures that all citizens will have equal access to information on the website including persons with disabilities and Limited English Proficiency (LEP). At this time the CDBG-NDR website contains all necessary information regarding the NDR Notice and Federal Register, both Phase 1 and Phase 2 applications and the Action Plan, Environmental Review documents, as well as some initial Citizen Participation documents. The website will continue to be populated with applicable documents as they become available. DOH will use existing procedures to maintain the website which includes a weekly review of content and updates as needed. Additionally, DOH has a dedicated CDBG-DR Information Technology staff person to continue with the maintenance of the website. The current web address is <https://portal.ct.gov/DOH/DOH/Sandy-Pages/Sandy-Programs/NDRC>. In addition, a separate but connected website for use as a community outreach tool has been developed as *ResilientBridgeport.com*. This website is maintained by contractors to the CTDOH.

## XVII. PROCEDURES TO DETECT FRAUD, WASTE, AND ABUSE OF FUNDS

The Department's Internal Auditor will check for fraud, waste, and abuse by utilizing the applicable internal auditing standards. The Internal Auditor will apply the standards in the Statement on Auditing Standards No. 99 (SAS 99) Consideration of Fraud in a Financial Statement Audit and the standards established in the International Standards for the Professional Practice of Internal Audit as promulgated by the Institute of Internal Auditors (IIA). The IIA is the lead organization that sets the standards for the practicing of Internal Auditing.

The Department's Internal Auditor will conduct risk assessments to determine whether to conduct further internal audit of the CDBG-NDR program based on the financial management of the program and its internal controls for payment processing and reporting, amount of funds spent, and the percentage of program completion.

Program monitoring staff will follow the procedures described in the NDR Policies & Procedures manual with a particular emphasis on compliance with all applicable state and federal requirements associated with the CDBG-DR funding.

## XVIII. OUTCOME VALUES

An updated list of metrics for each category of Resilience (OV-Res), Economic (OV-ECON), Social (OV-Soc) and Environmental (OV-Environ) Outcome Values in accordance with Phase 2 Factor 3 in the HUD NDRC Notice of Funding Availability (NOFA) was submitted within 90 days of the grant award and uploaded into DRGR and is part of the Action Plan. The metrics for each category and the associated projects are summarized in the table below. The CTDOH will report on the metrics in the 'Proposed Accomplishments' section of the DRGR report for each of the Outcome Values.

Resilience Outcome Value		
Activities	Metric	Total
NDR - BPT - Berm - Eastern Berm	Number of acres no longer vulnerable to flood events	75
	Number of fewer outages of critical facilities and utilities	1
	Number of CRS credit points earned	300
NDR-BPT Energy - District Energy Feasibility	Number of energy plans completed	1
NDR - BPT - Guide Floodplain Design Guidelines	Number of floodplain design standards updated	1
NDR - BPT Res Ctr - Resilience Center	Number of special events	5
NDR - BPT Univ - University Avenue	Number of properties with access above 100 yr flood level	8
LTC-ShoreUp	Number of homes retrofitted with resiliency measures	12
LTC-LocResPlan	Number of resilience plans created	32
LTC-GRNSTS	Number of legislative actions taken to improve resilience	1
LTC-SAFR	Number of executive orders issued	1

Economic Outcome Value		
Projects	Metric	Total
NDR - BPT - Berm - Eastern Berm	Number of participants in construction program	2,000
	Dollars of private investment	50,000,000
	% Increase in median property value of homes in project area	5

Economic Outcome Value		
Projects	Metric	Total
	Number of residential building permits	200
NDR - BPT Univ - University Avenue	Number of students enrolled	6,000
	Number of student residents in project area	1,500

Environment Outcome Value		
Projects	Metric	Total
NDR - BPT - Berm - Eastern Berm	Number of acres of green infrastructure created	1
NDR - BPT Res Ctr - Resilience Center	Number of green infrastructure projects constructed	1
NDR - BPT Univ - University Avenue	Number of tourists	20,000

Social Outcome Value		
Projects	Metric	Total
NDR - BPT - Berm - Eastern Berm	Number of community meetings	20
	Number of people at community meetings	500
NDR-BPT Energy - District Energy Feasibility	Number of community meetings	20
	Number of people at community meetings	500
NDR - BPT - Guide Floodplain Design Guidelines	Number of community meetings	20
	Number of people at community meetings	500
NDR - BPT Res Ctr - Resilience Center	Number of tourists	250
	Number of community meetings	20
	Number of people at community meetings	500
NDR - BPT Univ - University Avenue	Number of students visiting businesses and Seaside Park	1,000
	Number of community meetings	20
	Number of people at community meetings	500

## XIX. LONG TERM COMMITMENT

The CTDOH submitted Long Term Commitment activities with the application. All Long Term Commitments were completed by January 31, 2017 and reported on in the DRGR system.

## XX. LEVERAGE

The CTDOH has leverage reporting consistent with the NOFA and federal register notices. Documentation of the original leverage commitments are included with the Phase 2 application posted on the CTDOH NDR website. The leverage commitments were updated when funds were awarded to the State of Connecticut and those changes are reflected in the Action Plan. DOH will obtain letters confirming expenditure of committed leverage. These letters will reaffirm the direct or supporting leverage commitment and report on the funds received and used for the intended purposes. The statements will be on official letterhead and have the signature of an individual authorized to confirm funding expenditure. On a quarterly basis CTDOH will review and, if applicable, update its leverage expenditures in DRGR and attach the letters as documentation. CTDOH will follow the specific requirements for acceptable sources of leverage in the NOFA and Federal Register Notices for CDBG-NDR. For any substitutions of leverage sources, the CTDOH will provide notification in writing to HUD at least 10 business days in advance of making that change as a nonsubstantial amendment to the Action Plan. CTDOH recognizes that any reduction in the total amount of leverage could result in triggering a substantial amendment to the Action Plan and remains committed to the total amount of current leverage as updated in the Action Plan after funds were awarded.

## XXI. PROJECT CLOSEOUT

Project closeout is the process by which CTDOH determines that all applicable administrative actions and required work prescribed by the grant have been completed in accordance with the terms and conditions of the CDBG-NDR contract as well as federal and state rules and regulations. The closeout report should provide a detailed summary of the outcome of the grant and should address any concerns or findings that have been resolved since monitoring. The information provided in the closeout report should be an accurate summarization of the records and files that have been maintained throughout the grant term.

The CTDOH will initiate the closeout procedures when:

- All project costs, except closeout and contingency, to be paid with CDBG-NDR funds, have been incurred,
- All work that is to be financed by CDBG-NDR funding and/or leveraged funds has been completed,
- All other responsibilities outlined in the contract with HUD have been met.
- The final request for payment from HUD has been submitted.

A CDBG-NDR project includes an entire project that is completed using CDBG-NDR funds with or without other funds. A project cannot close out if only the CDBG-NDR funded portion of a project is completed. The entire project must be complete.

All CDBG-NDR files must be kept for at least five years from closeout. If any litigation, claim, or audit is started before the end of the five-year period, the records must be kept until the action has been resolved. CTDOH, HUD, and other federal or state agencies can complete an audit or monitoring visit

after project is closed out. Additionally, CTDOH may visit the project or access the files to complete a measurement and verification visit to assess long-term impact and effectiveness of the project.

Multiple closeout packages are available, and the type of activity completed will determine the package that is used. Certain documents will be included in all packages, but other documents may exist only in specific packages. Listed below are all of the documents required:

- CBDG-NDR Project Close-out Report
- Applicant/Recipient Disclosure/Update Report (HUD-2880) (FORM I-1)
- Closeout Public Hearing Sign-in Sheet (Form I-3)
- Financial Wage Compliance: Labor Standards Enforcement Report (Form I-4)
- Performance Measures

Regardless of which closeout package is used, all CDBG-NDR projects must include a public closeout hearing. An advertisement detailing the date, time, and location of the closeout hearing must be published in a local newspaper no less than fourteen (14) days prior to the closeout public hearing. A notice will also be posted in a public forum and/or online (community's website, social media, etc.).

## XXII. EXHIBIT I

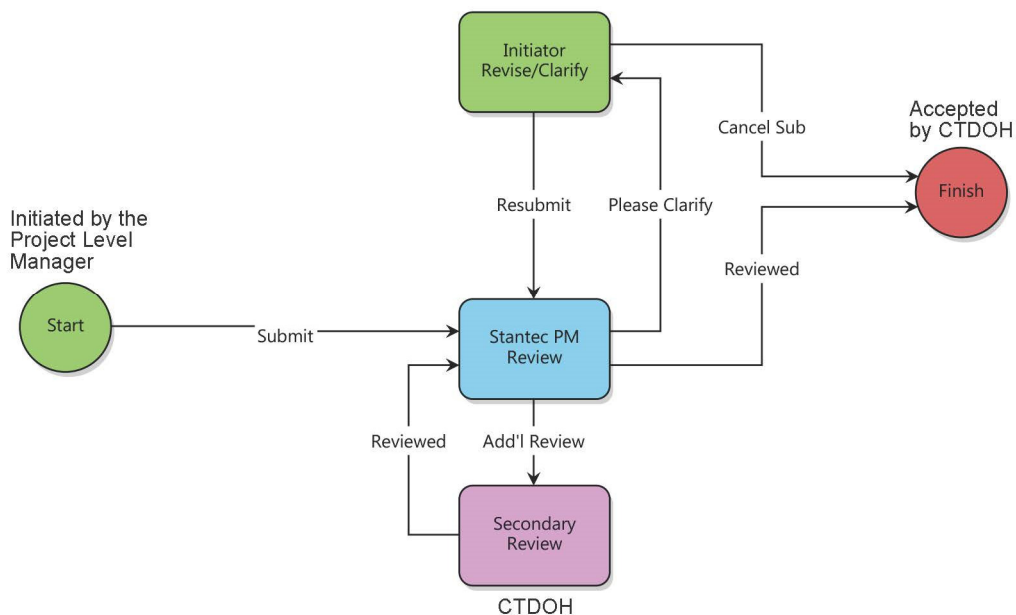
### WORKFLOWS

#### Project Documents

##### **General Document Submission**

All working documents (*ERR, studies, estimates, design documents, etc.*) shall be submitted to CTDOH through the document management system (see process diagram).

1. Workflow shall be initiated by the project level manager. Once submitted, Stantec will review and send on to the CTDOH (Rebecca French) as a Secondary Reviewer.
2. CTDOH will review. If corrections are needed, CTDOH will go directly to the project level manager (*copying Stantec*) for whatever might be needed. Once corrections are completed the deliverable will be resubmitted to gain the appropriate approvals, etc. and will be issued as final to CTDOH.
3. File name standard as follows: (*contract #\_task number\_description\_yyy-mm-dd.pdf*) (52829\_2.0\_GSCriteria\_20180530)
4. General Submission Workflow:



### **Public Engagement/Project Meetings**

All documents associated with public engagement, project meetings, TAC and CAC meeting (meeting notifications, presentations, minutes, etc.) shall be submitted to Stantec through e-Builder document management system using the General Submission workflow.

1. Workflow shall be initiated by the project level manager.
2. Documents shall be in a single PDF and include the following supporting documents where applicable:
  - Meeting invite/notification
  - Sign-in sheet(s)
  - Meeting presentation
  - Meeting minutes
  - Other supporting documents
3. File name standard as follows: (yyyy/mm/dd\_meeting name and number.pdf) (20180814\_CAC Meeting #4.pdf)

### **Contract Amendments Submission**

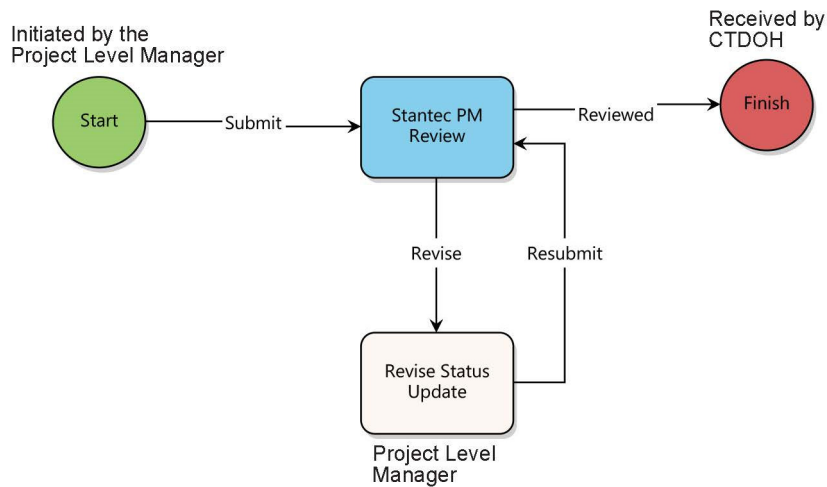
1. All revised or new contracts will be submitted to CTDOH directly.
2. Once contract negotiations between the consultant and CTDOH are complete and the contract is final, CTDOH will save a final copy into the folder below and notify Stantec:  
<https://app.e-builder.net/da2/daLanding.aspx?QS=205349f98cd5437ab0a46086c1e99556>
3. Stantec will enter the new approved commitment into the document management system for financial tracking.

### **Quarterly Summary Narratives Reports**

Stantec will send reminder emails for reports. Stantec will be responsible for collection of all reports and ensuring that CTDOH has copies on a timely basis.

1. Workflow shall be initiated by the project level manager. Quarterly Summary Reports and Metric Reports – due by the 7<sup>th</sup> day of the month following the close of a quarter (Q1-April 7<sup>th</sup>, Q2-July 7<sup>th</sup>, Q3-October 7<sup>th</sup>, Q4-January 7<sup>th</sup>).
2. Reports will be submitted by the project level manager through the document management General Submission process for compiling.
3. Once reviewed by Stantec they narratives will be submitted to CTDOH for inclusion in DRGR quarterly reporting to HUD.



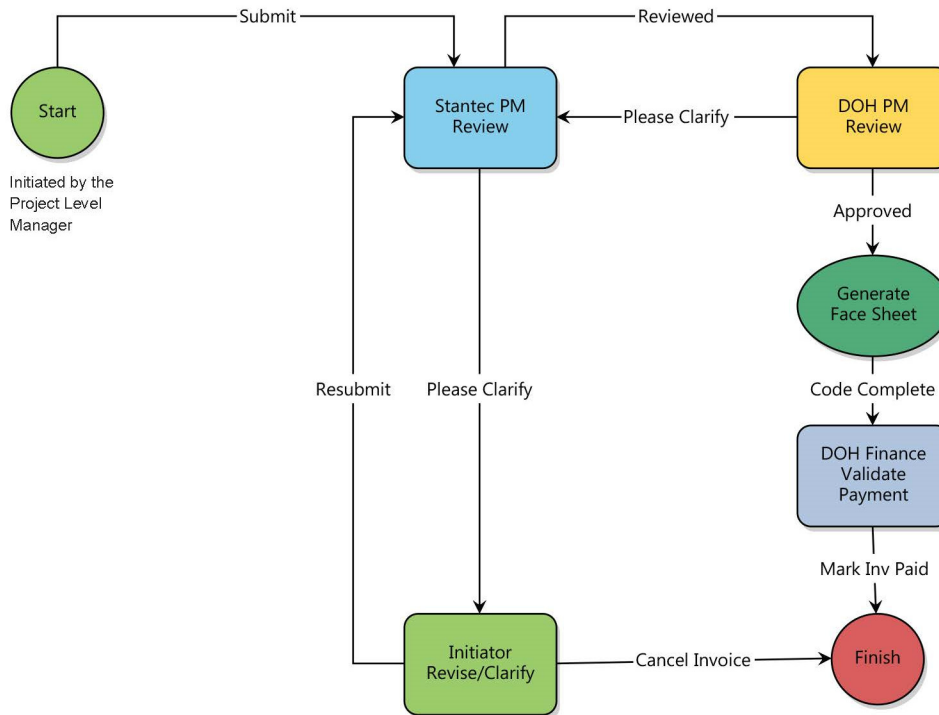


## **Financial Documents**

### **Invoice Submission and Payments**

All invoices shall be submitted to CTDOH through the document management system (see process diagram).

1. Workflow shall be initiated by the project level manager shall be submitted through the document management system under the Cost Tab and Master Invoices.
2. Invoice shall not be sent directly to CTDOH (see process diagram).
3. Invoice amount shall be project based and shall include the following supporting documents:
  - Cover Letter
  - Contract Face Sheet
  - Direct Cost Summary
  - Progress Report
  - Direct Billing Back-up
  - Direct Expense back-up (to be submitted as a separate PDF)
4. Stantec will review to ensure compliance with program regulations and approved contracts and deliverables and schedule and budget and send on to CTDOH PM for review and approval.
5. CTDOH PM approves and sends payment request to DOH Financial staff for processing
6. DOH Financial staff reviews and creates payment voucher in CORE-CT
7. Upon approval by CTDOH, a Face Sheet will be generated, CTDOH Finance will validate payment and process will be complete.
8. File name standard as follows: (*consultant initials contract #NDR\_PR#XX\_* *yyyy/mm/dd\_consultant invoice number.pdf*) (WSP 52829NDR\_PR#1\_20171130\_749797)
9. Invoice Submission Workflow:



### DRGR Drawdowns

1. Drawdowns done on monthly basis by CTDOH staff.
2. Using expenses recorded in CORE-CT that are already paid, including but not limited to contractor payments, CTDOH payroll and administrative expenses.
3. CTDOH runs financial 07-A DRGR report to verify expenses already reimbursed.
4. CTDOH Financial Staff Compare against total expenses from CORE-CT.
5. CTDOH Financial Staff Difference is the drawdown amount.
6. CTDOH Financial Staff sends drawdown report to CTDOH PM.
7. CTDOH PM reviews and approves drawdown report.
8. CTDOH Financial staff creates and approves vouchers in DRGR for drawdown.
9. HUD initiates reimbursement through CORE-CT.
10. CTDOH Financial staff allocates reimbursement to activity budgets in CORE-CT.

### SF425 Reports

1. CTDOH Financial Staff runs a DRGR report for program reimbursements quarterly
2. CORE-CT is used to determine quarterly expenditures by CTDOH Financial Staff
3. CTDOH Financial Staff creates report using CORE-CT comparing obligated contract funds to quarterly expenditures
4. CTDOH Financial Staff provides SF425 form and financial report to CTDOH PM
5. PM reviews and approves
6. CTDOH Financial Staff sends to DECD Financial Manager per MOU between CTDOH and CT DECD for approval and signature
7. Upon approval CTDOH PM sends SF425 form to HUD
8. CTDOH PM ensures an electronic version stored provides for records keeping