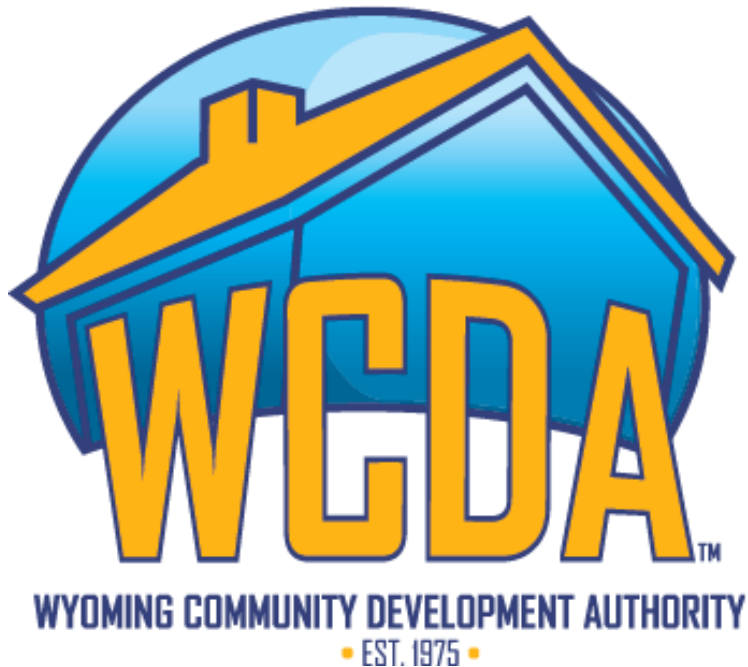


STATE OF WYOMING WCDA CDBG

PROCUREMENT MANUAL



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TABLE OF CONTENTS

Introduction	Page 3
Procurement	Page 4
• Professional Services	
• Materials	
• Housing Rehab or Renovation	
• Construction	
• Sole Source	
• Other	
Additional Procurement Requirements	Page 8
Section 3 Requirements	Page 9
Build America Buy America Requirements	Page 9
Equal Opportunity and Affirmative Action	Page 10
Recordkeeping	Page 10
Unfair Competitive Advantage	Page 10
Davis Bacon & Related Acts	Page 10
Cost & Price Analysis	Page 11
Conflict of Interest	Page 11
Financial Management	Page 12
• Management System	
• Records	
• Internal Controls	
• Grant Draw Request Procedures	
• Single Audits	
Attachments	
• WCDA CDBG VENDOR/COST DOCUMENTATION FORM	
• WCDA CDBG MBE/WBE PROCUREMENT FORM	
• WCDA CBDG DAVIS BACON CHECKLIST	
• REQUEST FOR CDBG GRANT FUNDS	

INTRODUCTION

On December 19, 2014, the federal Office of Management and Budget published a new rule which consolidated several federal regulations related to financial management, procurement, and auditing of federal funds. This new rule, entitled *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* is found in Title 2 of the Code of Federal Regulations in Part 200 (2 CFR Part 200). On January 6, 2016, the U.S. Department of Housing and Urban Development adopted and codified the new rule and amended Community Development Block Grant Program regulations. Community Development Block Grants are governed by 2 CFR Part 200 Subpart E and 24 CFR Part 570 (HUD CDBG Regulations).

Because the state Community Development Block Grant (CDBG) Program is subject to only portions of the new rule and states can choose not to adopt certain portions of the rule, the Wyoming Community Development Authority (WCDA) as the State of Wyoming administrator of these grant funds, has developed this Manual, which includes policies, requirements and required forms. The procedures are designed to ease the process by creating uniform standards for grantees. It is designed to be used in conjunction with information in the WCDA CDBG Policy and Procedure Manual, Federal, HUD and State regulations. WCDA policy and procedures are not all inclusive.

All CDBG grantees must to comply with the following procedures, policies and requirements when procuring and expending CDBG funds. CDBG grantees shall ensure their local policies and procedures are in compliance with those set forth in this Manual. These policies also apply to subrecipients, housing developers and businesses.

In the event that the policies and procedures in this Manual conflict with those of other state or federal funding agencies, a meeting will be required between all parties to determine how to proceed.

PROCUREMENT

All procurement activities must allow for full and open competition when using federal CDBG funding for goods and services. Grantees must demonstrate that all costs are reasonable and necessary and that the best price was obtained from the most qualified provider.

The following items restrict free and open competition and must be avoided:

- unreasonable qualifying requirements;
- unnecessary experience/excessive bonding requirements;
- specifying only brand name products;
- geographic preference;
- non-competitive pricing practices; and
- non-competitive contract awards.

Grantees should be mindful of these restrictions when drafting project specifications and bidding documents. Practical alternatives should be considered when possible. Written explanations must be provided in the event the lowest bid is not selected.

There are five procurement methods available under the federal standards:

- Micro-Purchase
- Small purchase
- Sealed bid (construction)
- Request for proposals (RFP)
- Non-competitive (sole source)

A Micro-Purchase at the federal level is any procurement *under \$10,000*. The requirements include:

- Getting competitive quotes
- Selecting the most reasonable offer
- Allows the use of purchase orders

A “Small Purchase” at the federal level, also known as “streamlined” method, is anything *below the Simplified Acquisition Threshold (SAT) of \$250,000*. Requirements include:

- Getting an “adequate” number of quotes (typically 3)
- Selecting the most reasonable offer

Sealed Bids are required for construction contracts and to purchase equipment and/or supplies. The sealed bid process involves:

- Developing an invitation for bids
- Publicly soliciting bids
- Opening bids and announcing prices publicly
- Reviewing bids in detail
- Awarding contract to lowest responsive bid

Note that *separate* bids and contracts for engineering services and construction means that *different* procurement processes can be used. Grantee does not need a sealed bid for engineering services unless they are part of the construction contract.

Request for Proposals (RFP) process involves:

- Announcing and issuing RFP
- Opening, reviewing, and comparing proposals
- If necessary, negotiating with offerors
- Requesting and reviewing “best and final” offers
- Awarding contract

Non-Competitive or Sole Source procurements are permitted when an award is infeasible under other methods and one of following applies:

- Item is available from only one source
- Emergency situation will not permit delay
- HUD authorizes non-competitive proposals
- Attempted full process and received insufficient number of responses
- Price or cost analysis and written justification must be in files

In rare circumstances, the CDBG Program will allow for procurement through a sole source method. When requesting approval, the grantee must document the reasons why a sole source is justified. The request for sole source approval must be submitted in a timely manner by the grantee before procurement is undertaken. Written approval or denial by WCDA will be provided.

Professional Services

Professional services include those services provided by engineers, architects, inspectors, surveyors, appraisers, title companies, consultants (including private grant administrators), etc. Requirements for procurement of professional services are based on the estimated amount of the service.

1. Up to \$250,000 – Using a written description, grantees must solicit written cost estimates from at least two vendors. Costs and information about vendors must be documented on the CDBG Vendor/Cost Documentation form attached to this Manual, with written cost estimates in the file.
2. Over \$250,000 – Grantees must use a competitive Request for Proposal/Services or Request for Qualification and submission of sealed bids. This process requires formal advertising in at least one local newspaper of general circulation.

For competitive requests, if only one bid is submitted, grantees must initiate another process. In the event that only one bid is submitted during the second round, the grantee may accept the bid if it meets all qualifications and requirements.

If a service is specialized and there is limited availability of those professional services, the grantee must consult with WCDA prior to executing a contract.

If a Grantee has an existing contractual agreement with an engineering or other professional service firm and would like to use the firm for the CDBG funded grant activities, the grantee must be able to demonstrate that it hired this firm through a solicitation process if the total of services is up to \$250,000. The contract with the selected firm must be for a term of five years or less. The grantee must provide documentation to WCDA of this process.

For all procurement activities, the grantee must document efforts to attract minority and women owned businesses (MBE/WBE) and complete the MBE/WBE Procurement Form that is attached to this Manual for each procurement.

Materials

Materials include, but are not limited to: construction materials, iron, steel, equipment, and supplies.

When using CDBG funds to procure materials only, grantees must solicit written cost estimates from at least two vendors. Costs and information about vendors must be documented on the CDBG Vendor/Cost Documentation form with written cost estimates in the file. Note that if this activity is carried out by a contractor outside of the construction contract, the contractor must follow these procedures and provide documentation to the grantee to approve prior to purchase.

Grantees must follow the requirements of the Build America Buy America Act. See associated regulations at 2 CFR Part 184.

Housing Rehabilitation and Renovation

All work required as part of the rehabilitation or renovation of housing must be procured using a competitive Request for Proposal process that involves the submission of sealed bids. This process requires formal advertising in at least one local newspaper of general circulation. The exception to this requirement for formal advertising is related to establishment and use of a contractor list as set forth below.

Note that multiple units may be bid under one contract but federal labor standards will be applicable if the contract is for eight or more housing units.

For individual well and/or septic replacements, the grantee must solicit cost estimates from at least two contractors. Costs and information about contractors must be documented on the CDBG Vendor/Cost Documentation form.

Grantees may establish a qualified contractor list for housing rehabilitation to use for each new grant received. Under this process, the grantee must undertake one Request for Qualifications, which requires formal advertising in at least one local newspaper of general circulation at the beginning of each grant term. The grantee will solicit qualified contractors to be included on a list. The contractors on the list will be given the opportunity to bid on each job as it becomes available. Contractors must provide information to meet specific qualifications which includes licensing, certifications, bonds, past performance, etc. Contractors must be licensed in the State of Wyoming

and not be listed on the federal debarment list. Each contractor list must contain at least two approved contractors.

This process may also be used for soliciting contractors for projects that involve construction activities at multiple sites, such as renovation of group homes and housing for the homeless.

For utility connections, Grantees may complete a Request for Proposal to solicit contractors to complete connections for up to seven housing units under one contract. Federal labor standards will be applicable if contract is for eight or more housing units.

Grantees shall develop Requests for Proposals based upon work orders prepared for the rehabilitation or renovation of houses. For those using a contractors list, the specific work orders for each job should be made available to all the contractors on list.

Construction

The procurement of construction activities is based on the estimated amount of the service.

1. Up to \$50,000 – The grantee must use a competitive Request for Proposal and submission of sealed bids; however, the grantee has the option to: (1) post it on Grantee’s website, (2) submit to e-marketplace websites, and/or (3) advertise in a local newspaper of general circulation. Selected option(s) must be documented in the files
2. Over \$50,000 – Grantee must use a competitive Request for Proposal and submission of sealed bids. This process requires formal advertising in at least one local newspaper of general circulation.

Grantee must hold a pre-bid conference for each Request for Proposal issued for construction activities over \$50,001.

Potential contractors must submit a 5% bid bond with their bid submittals for construction projects over \$100,000.

For each contract in excess of \$100,000, the Grantee must obtain a 100% payment bond and a 100% performance bond in the amount of the contract.

Other

There are additional circumstances that permit grantees to establish a qualified contractors list following the same process identified under the Housing Rehabilitation and Renovation section. Examples include spot blight demolition programs impacting multiple sites, clearance, and/or relocation of mobile homes, etc.

For eligible equipment purchases, the grantee must solicit cost estimates from at least two vendors. Costs and information about vendors must be documented on the CDBG Vendor/Cost Documentation form.

The CDBG Program does not typically fund other goods. In the event that these items are approved, grantees will need to discuss further with WCDA and agree upon the process to be used for purchasing goods.

Additional Procurement Requirements

For all procurement efforts in any category, grantees must also adhere to the following:

1. Grantee will avoid procuring unnecessary and duplicative items.
2. Grantee will provide WCDA a copy of all the bid procurement documentation prior to sending any request for proposals or advertising.
3. Grantee will conduct an online search of Minority Business Enterprises (MBE) and Women Business Enterprises (WBE) using the Wyoming Department of Transportation's website (<https://wydot.exevision.com/ws/AlphaDbeDirectory.aspx>) and send those firms a copy of the Request for Proposal/Qualifications. This will ensure the grantee follows its WBE and MBE Plan. Complete the MBE/WBE Procurement Form attached to this manual for each procurement.
4. Potential contractors must be provided at least two weeks to return sealed bids.
5. Grantee must establish written evaluation criteria to be used when selecting contractors or vendors. Criteria should include expertise, past record of performance, capacity to perform, and familiarity with type of project.
6. Grantee must conduct a public bid opening of all bids received at the time and place stated in the invitation for bid (IFB). 2 CFR 200.320(b)(1)(ii)(C).
7. Grantee must prepare a written price or cost analysis for selected bid/price to determine if costs are reasonable.
8. Grantee must maintain written protest procedures to handle and resolve disputes relating to its procurements and shall, in all instances, disclose information regarding the protest.
9. Once a vendor or contractor is selected prior to execution of the contract, the grantee must complete a debarment check using the WCDA CDBG Program Debarment Check form (see Wyoming WCDA CDBG Program Policy and Procedure Manual, Exhibit F) on the proposed contractor for all construction, non-construction, or housing rehabilitation/renovation activities. The grantee will confirm to WCDA that the debarment check was completed.
10. Grantee must supply WCDA with written evaluation of all bids received and the contract for the selected contractor to review prior to execution of the contract.
11. Grantee must enter a written contract with the selected vendor or contractor.
12. Once a construction contract is fully executed and all bonds are secured (if required), the grantee will schedule a required preconstruction meeting with all contractors, subcontractors and WCDA after providing a minimum of two weeks' notice. The grantee shall provide WCDA with meeting notes. WCDA will provide required forms and a written "Notice to Proceed" to the Grantee at the end of the preconstruction meeting if all requirements have been met.
13. The grantee will issue a written "Notice to Proceed" to the contractor.
14. Only firm fixed contracts will be approved. The following types of contracts are prohibited: time and material contracts, cost plus a percentage of cost, and percentage of construction cost.

15. At least two bids must be submitted when a Request for Proposal, Request for Services or Request for Qualifications has been issued. If only one is received, Grantee must begin the procurement process again.
16. Grantee may not award contracts which include CDBG funds to any contractor on retainer to the grantee.
17. All contracts must contain specific performance measures with penalties for nonperformance.

Section 3 Requirements

For construction projects with more than \$200,000 of HUD funding, grantees must adhere to Section 3 of the federal Housing and Urban Development Act of 1968, as amended. See 24 CFR Part 75. The requirements apply to the entire project and not just the CDBG-funded activities and contracts. To the greatest extent feasible, Section 3 Business Concerns and/or Section 3 Workers are to be hired. Grantees must report on total labor hours for the entire project, making the best effort to ensure that 25% of labor hours are provided by Section 3 workers. Additionally, a minimum of 5% of those hours are to be provided by Targeted Section 3 Workers.

Build America, Buy America Act Requirements

The Build America, Buy America Act (BABA) established domestic procurement preferences for all infrastructure projects funded with federal financial assistance. Specifically, the BABA requires that all iron, steel, manufactured products, and construction materials are produced in the United States.

The BABA applies to all projects involving construction of, alteration/rehabilitation of, maintenance, or repair of infrastructure. For purposes of BABA, "infrastructure" includes, at a minimum, the structures, facilities and equipment for roads, highways, and bridges; public transportation; dams; water systems including drinking water and wastewater systems; broadband; electrical transmission facilities and systems; utilities; facilities that generate, transport, and distribute energy; and buildings and real property.

The Build America Preference (BAP) applies to infrastructure spending unless a federal agency issues a waiver in three limited situations: 1) when applying the domestic content procurement preference would be inconsistent with the public interest; 2) when types of iron, steel, manufactured products or construction materials are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality; or 3) where the inclusion of those products and materials will increase the cost of the overall project by more than 25 percent.

Before issuing a waiver under Section 70914(c), the head of a federal agency, including HUD, must make publicly available a detailed written explanation for the proposed determination to issue the waiver and provide a period of not less than 15 days for public comment on the proposed waiver.

See additional detailed information in [BABA: Buy America Preference for CDBG Grantees Quick Guide](#).

Equal Opportunity and Affirmative Action Strategies

Grantees must incorporate women owned and minority owned businesses in solicitations wherever there are potential sources and divide procurement into multiple procurements when economically feasible to permit maximum participation of eligible businesses.

Recordkeeping

Grantees must maintain copies of all paperwork relating to compliance with procurement regulations for each procurement activity. All documentation must be maintained for five years beginning from the date of project close out.

Unfair Competitive Advantage

To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft design plans and specifications, requirements, statements of work, and invitations for bids or requests for proposals must be excluded from competing for such procurements.

However, in instances where a contractor was asked to provide estimates for an application for funding, that contractor can bid on the project if all potential bidders are provided the same information used by that contractor when it produced the estimate.

Federal regulations do not allow state or local preference when considering bids. Therefore, the Wyoming Preference Act does not apply.

Davis Bacon and Related Acts

CDBG projects that result in construction contracts that exceed \$2,000 are subject to the federal Davis-Bacon Act, the Contract Work Hours and Safety Standards Act of 1962, and the Fair Labor Standards Act. All employers (contractors, subcontractors, and any lower-tier subcontractors) are required to pay all laborers and mechanics employed or working on the site once per week. They must be paid, at minimum, the full amount of wages and bona fide fringe benefits contained in the wage decision. Employers must prepare, certify, and submit weekly payroll reports reflecting all the laborers and mechanics (employees) working on the project. Employers may also be required to submit related documentation to demonstrate compliance. The principal contractor (also referred to as the “prime contractor”) is responsible for the full compliance of all employers (itself, subcontractors, and any lower-tier subcontractors) with the labor standards provisions applicable to the project.

WCDA requires grantees to complete the WCDA CDBG Davis Bacon Training and pass the quiz with a minimum 80% score. This should be completed prior to or at the time the environmental review record is signed. The WCDA CDBG Davis Bacon Training and quiz can be found on the WCDA website.

The WCDA CDBG Davis Bacon Checklist and WCDA Davis Bacon information packet will be provided by WCDA. These documents will assist with the process and ensure compliance with

Davis Bacon requirements. After completion of page one of the checklist, it must be signed and uploaded to ProCore.

All Davis Bacon requirements must be complied with or all draw requests will be held until compliance is met. Please see Wyoming WCDA CDBG Program Policy and Procedure Manual for more details.

COST AND PRICE ANALYSIS

A written cost or price analysis must be performed in connection with every procurement activity. The method and degree of analysis depends upon the specific procurement activity. The analysis should be compared to the estimates provided in the CDBG Application under Funding Sources.

Cost Analysis

This is the evaluation of the separate elements that comprise a contractor's total cost proposal or price to determine if those costs are allowable and reasonable. Cost or price data should be provided by the contractor and is the means for conducting this analysis. The evaluation should review the contractor's cost or pricing data to verify each component, along with examining each element for necessity, reasonableness of materials costs, labor costs, equipment and overhead. Grantees shall compare costs with previous work, other data received from other contractors and independent cost estimates.

Grantees must prepare a cost analysis for each change order to an existing contract prior to approval of that change order.

Price Analysis

A price analysis is the evaluation of a proposed cost or price as a lump sum, without analyzing any of the separate cost elements with which it is composed. It is used when proposals are compared during a competitive pricing situation. Price analysis is the process of deciding if the asking price for a product or service is fair and reasonable without examining the specific cost and profit calculations the contractor used in arriving at the price. When adequate price competition does not exist, some other form of analysis is required.

Examples of other forms of price analysis information include an analysis of previously paid prices, comparison of vendors' price with in-house estimates, and/or a comparison of quotes or published price lists from multiple vendors.

Procurement files should contain the original estimates and either the cost or price analysis and shall be maintained for five years from project close out.

CONFLICT OF INTEREST

Grantees must comply with federal Code of Conduct or Conflict of Interest Standards found in 2 CFR Part 200 and 24 CFR Part 570.489 which includes having a written policy. Additionally, Wyoming requires various public officials to comply with the Wyoming Ethics and Disclosure Law (Wyo. Stat. 9-13-101 through 109), along with Wyoming Statutes 15-1-127 to 128; 16-6-118; and

6-5-101 through 118. *Note that those exempt from this requirement under the State of Wyoming law must still comply with federal requirements.*

When conflicts of interest arise, grantees must identify, disclose, and manage them. Grantee should notify WCDA when a conflict of interest arises or may potentially arise. *Conflicts of interest are situations, not allegations, but they must be disclosed and properly managed.* Please see the WCDA CDBG Policy and Procedure Manual for more information.

FINANCIAL MANAGEMENT

A financial management system is necessary to ensure the appropriate, effective, timely and legal use of CDBG funds (see WCDA CDBG Policy & Procedure Manual for additional information). The critical areas of a financial management system include internal controls, accounting records, allowable costs, source documentation, budget controls, cash management system and financial reporting. WCDA will only review the financial management systems of WCDA's grantee, not the subrecipient or developer.

The regulations are designed to:

- > Eliminate duplicative/conflicting guidance;
- > Focus on performance over compliance for accountability;
- > Provide for consistent treatment of costs;
- > Limit allowable costs for the best use of Federal resources; and
- > Incorporate standard business processes using data definitions;

The Grantee's project files should document all costs associated with the CDBG project. WCDA will monitor all expenditures of CDBG funds. Subrecipients, developers and businesses should provide copies of all documentation related to contracts, invoices, and project draw requests to the Grantee for retention in their project files for five years from grant close out.

Financial Management System

The financial management system used by grantees must satisfy all the following:

1. Provide accurate, current, and complete disclosure of the financial status of the CDBG project by eligible program activity;
2. Compile and justify data required in reports and draw requests;
3. Maintain records that identify the source and disposition of all funds for project activities;
4. Provide effective control over the accountability for CDBG funds, property, and other assets;
5. Compare actual expenditures with budgeted amount in the grant application;
6. Establish and maintain procedures to ensure the timely expenditure of funds;
7. Establish and maintain accounting records that are supported by source documentation verifying the "reasonableness, allowability and allocability of costs;" and
8. Document all other sources of project funding.

Grantees must ensure their accounting system will satisfy the standards and requirements described in this Manual.

Financial Management Records

At a minimum, the following information and records must be maintained in the grantee's accounting system for CDBG funds and other funds included in the project:

1. Transaction date, description, source document reference and amounts;
2. Summary of receipts;
3. Summary of disbursements by program activity as identified in the CDBG grant agreement;
4. Summary of cash transactions; and
5. All source documentation (original receipts, checks, invoices, etc.).

Internal Controls

Grantees must establish internal controls in their financial management systems to provide effective control over and accountability for all funds, property, and other assets and to ensure they are used for authorized purposes. All internal controls and procedures must be written and available for review. Specifically, the grantee must:

1. Adopt and maintain a formal system of authorization and supervision to ensure there is separation of financial management responsibilities so that no one has complete control over all phases of any transaction. Grantees should maintain organizational charts and written definitions of duties.

For example, the persons authorized to sign draw requests should be different from the persons authorized to write/sign checks on the account.

2. Ensure that verification and reconciliation of cash balances with bank statements should be made by employees who do not handle or record cash or sign checks.
3. Ensure that all CDBG expenditures are approved in compliance with local procedures and processes prior to submission draw request.

Grant Draw Request Procedures

WCDA grant draw request procedures are designed to minimize the amount of time elapsed between the transfer of funds from HUD to WCDA and from WCDA to the grantee. The grantee will submit a Request for CDBG Grant Funds (attached to this Manual) with detailed receipt and/or detailed invoice, and proof of payment. The request needs to be submitted by the 10th of each month. WCDA will review draw requests against actual expenditures to ensure that there was a timely expenditure of funds once the Grantee received grant funds.

Single Audits

The Single Audit threshold is \$750,000 for all federal funds spent by a grantee in a single fiscal year, not just the CDBG funds. The known questioned cost limit in a Single Audit is \$25,000 or greater and requires the auditor to report this as an audit finding. If a single audit is required, the grantee must submit a final copy of the audit report within nine months of the end of fiscal year.

WCDA CDBG VENDOR/COST DOCUMENTATION FORM

Description of needed service or product: _____

Quote #1:

Name of vendor: _____
Address: _____
Phone #: _____
Quoted Price: _____ Date: _____

Quote #2:

Name of vendor: _____
Address: _____
Phone #: _____
Quoted Price: _____ Date: _____

Quote #3:

Name of vendor: _____
Address: _____
Phone #: _____
Quoted Price: _____ Date: _____

Selected Vendor: _____

Reason for Selection: _____

Person Completing Form: _____ **Date:** _____

WCDA CDBG MBE/WBE Procurement Form

Procurement #: _____

CDBG Grant #: _____

Activity: _____

Describe efforts made to solicit a minority or woman owned business enterprise for this procurement activity:

Did you search the Wyoming Workforce website:

Was the contract ultimately awarded to a minority or woman owned business enterprise:

Person Completing Form: _____ **Date:** _____

WCDA CDBG Program Davis Bacon Checklist

Project Name/Number: _____

- Completed CDBG Davis Bacon training and complete quiz
- Received WCDA Davis Bacon information packet
- Obtained Davis-Bacon Wage Rate <https://sam.gov/> - Date: _____ (to be included in bid documents and contract)
- Obtained?? Federal Labor Standards Provisions
CPD-HUD-4010 X (Contracts over \$2,000)
(to be included in bid documents and contract)
- Completed?? CDBG HUD Rider (to be included in bid documents and contract)
 - 10 days prior to bid opening check wage determinations for any modifications
 - If there is a modification notify all bidders of change or document reason for non-notificationNotification date: _____
- Submitted bid documents to WCDA for review prior to publishing
- Submitted proof of publication and bid tab to WCDA for review prior to award
- Verified contractor eligibility at www.sam.gov (prior to contract execution & print result for project file) Name of contractor: _____
 - Debarred Not Debarred Date: _____
- Submitted HUD-4230A Conformance Request form to WCDA Staff at neighborhooddev@wyomingcda.com (to be included in contract documents)
Date emailed to WCDA: _____
- Submit contract to WCDA for review prior to executing
 - Signed contract within 90 days of bid opening. (New wage decision required if greater than 90 days)Contract signature date: _____
- Notified WCDA of pre-construction meeting at least two weeks prior
Notice to WCDA date: _____
Pre-Construction Meeting date: _____
- Completed the following on first day of construction:
 - Posted Davis Bacon poster WH-1321 - date posted: _____
 - Posted prevailing wages - date posted: _____
 - Photo taken for project file - date sent to WCDA: _____

Grantee Signature

Date

REQUEST FOR CDBG GRANT FUNDS

Date Submitted: _____ Requisition Number: _____

Grantee: _____ IDIS Number: _____

Project: _____ Project Year: _____

We are hereby requesting reimbursement of Community Development Block Grant funds paid in the amount of \$_____ for the project at _____ for work completed and/or material delivered and in place on said project.

Attach the proof of payment and copy of invoice

I/we do hereby certify that this payment will accurately reflect work completed and/or material purchased for this project:

Authorized Grantee

Date

This request for payment appears to be properly prepared, and the above signee has certified the request for funds is for work completed and/or materials purchased for this project.

Housing & Neighborhood Development Director

Date

Line Item from budget and description of service or materials provided	Name of contractor or supplier	Date of Invoice	Amount of Invoice	Reimbursement amount requested
Total:			\$	\$

Program Account Balance:	CDBG Funding
Grantee PY ____ Grant award:	\$
CDBG Drawdowns Approved to Date:	\$
Program Income to Date:	\$
Current Drawdown Request for Payment:	\$
Balance Remaining:	\$