Take it for Granted

Provide feedback & input OCRA policies

As the new CDBG Program Director, I have been charged with reviewing, revising, and documenting policies and procedures related to OCRA's CDBG programs. Some of that work was seen in Round 3 of the 2017 grant cycle with more to come. One important part of this work is transparency and synthesizing feedback. I fully believe that good policy is created through collaboration and open dialog. To that end, I have created a public comment process that will be used as OCRA establishes CDBG policies. This process is shown in the graphic below. The first set of policies to go through that process are:

- Urgent Need (new policy)
- Public Hearing Notice Period (clarification on current policy)
- Application Scoring and Feedback (documentation of current policy)
- Grant Administrator Certification and Continuing Education (revisions to current policy)

Public comment will be collected via an online survey. Drafts of these policies can be [found on our website.](#) In order to avoid missing comments, we do require all comments be submitted via the survey. The public comment period for this set of policies starts today (February 16), and ends on **March 9 at 4 p.m (EST)**. Additionally, we will post a video that summarizes the polices and provides insight into the thought-process behind them. At the end of the public comment period, OCRA will the review the feedback, make revisions if needed, and then, with the approval of the executive staff, post them. Once they are posted, they are to be considered final and effective on their respective effective dates.

If you have any questions, please contact [Eric Ogle](#).

CDBG Policy Review Process

| Internal Draft & Review | Grant Administrator Working Group Review | Post for Public Comment | Overview Webinar | Public Comment Period (via SurveyMonkey) | Revision Based on Public Feedback | OCRA Approval | Posting of Final Rule |

# Web-based instructional System for Environmental Review (WISER)

The Web-Based Instructional System for Environmental Review (WISER) teaches grantees how to understand and address all aspects of the environmental review process required for all HUD-assisted projects. This set of self-paced online learning modules can be completed in any order. Each module includes its own learning assessment and opportunity for obtaining a certificate of completion.

Topics include:

- Understanding the overall requirements for assessing the environmental impacts of any HUD-assisted project.
- Understanding how to conduct particular components of an environmental review process, including concerns related to: endangered species; environmental justice; airport hazards; noise abatement and control; water elements; explosive and flammable materials; farmland; wild and scenic rivers; air quality; historical preservation; site contamination; and environmental assessment factors.

Access the Modules

1. Click the link to access the module.
2. You are prompted to either create or log into your HUD Exchange Learn account.
3. If you need to create an account, click "Create an Account."
   - Fill out the form, and click the "Create Account" button.
   - Your account has been created and you receive a confirmation email.
4. After creating an account or logging in, the training launches in a new window. Ensure your pop-up blockers are turned off.
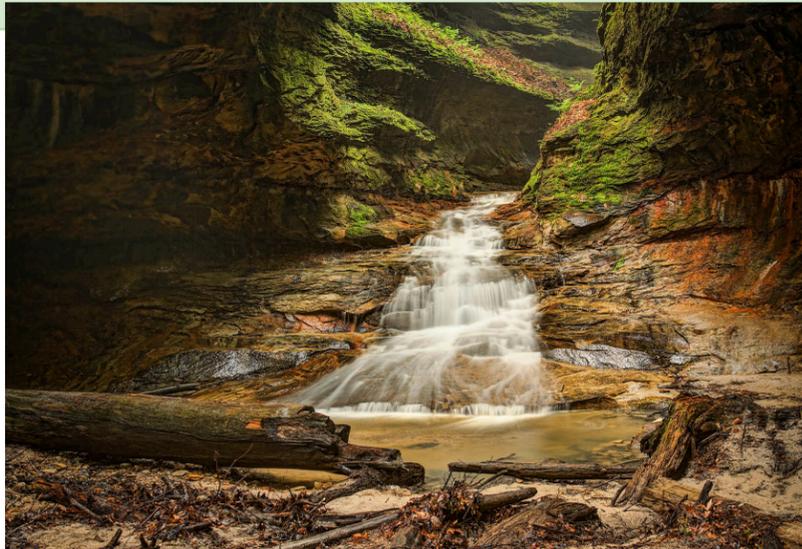
Take the Quiz & Provide Feedback

To receive credit for completing each module, you must do the following:

1. Complete the module.
2. Take the Completion Quiz for the module. After completing the module, close the window. You are taken to the training page in HUD Exchange Learning. Click the "Completion Quiz" link under Activities. You can also access the quiz from the section on this page associated with each module.
3. Complete the Satisfaction Feedback Form for each module. After completing the module, close the window. You are taken to the training page in HUD Exchange Learn. Click the "Satisfaction Feedback" link under Activities. Also access the feedback form from the section on this page associated with each module.

Bona fide fringe benefit information

The Davis Bacon Act applies when a project is federally funded. Wage and fringe packages are approved by unions to give workers a fair base wage and fringe benefits package. When the Davis Bacon Act is applied to the labor, fringes must be considered *bona fide* to be included in the total wage package assigned to your community's project.

All unions have different naming conventions and only the respective union can provide the acronym's definition. We stress that if you have questions please reach out to the unions directly for an explanation.

To help determine if the fringe is *bona fide*, ask the union for the definition of the fringe and how the money is used. Look to see that:

- Contributions are irrevocably made to a trustee or a third party pursuant to a *bona fide* fringe benefit plan or program.
- The rate of cost incurred is by providing *bona fide* fringe benefits pursuant to an enforceable commitment to carry out a financially responsible plan or program. The program must be communicated to the employees in writing.
- For more information, see 40 USC 3141 and 29 CFR 5.2(p).

Acceptable examples include:

- Life insurance
- Health insurance
- Pension
- Vacation
- Holidays
- Sick leave
- Training
- IN Laborers Defined Contribution Trust (ILDCTF).
- Any fringe benefit that deposited into an irrevocable account on behalf of the worker.

Unacceptable fringes include:

- Truck usage
- Thanksgiving turkey
- Christmas bonus
- Cell phones
- Substance Abuse Testing/Drug Testing (SAT)
- IN Constructor Industry Advancement Fund (ICIAF) - which is paid to contractor.
- Building Industry Marketing Program (BITF) – a fund that the union uses to educate lawmakers on anything and everything about prevailing wages, etc.
- Payments required by federal, state or local law are not fringe benefit contributions. Such payments required to fund Social Security, unemployment compensation and workers' compensation programs, as required by law, don't qualify as fringe benefits. Another example is income tax withholdings.

- Uniforms
- Tools
- Travel time

Grant administrators should check the Labor Form 9 is submitted by the contractor for *bona fide* fringes prior to submission. If there are any questions, please contact the grant services' Labor Standards specialist, Beth Dawson.

Please review these Grant Services notices

OCRA is no longer accepting the following forms: Closeout Form 4, Notification of Single Annual Audit and Closeout Form 5, Sub-recipient Notification of Single Annual Audit. Grant administrators should communicate with their communities about this change and OCRA will communicate with Clerk-Treasurers. Contact Megan Hruska if you have any questions.

Grantees may sign engineering, architecture and grant administration contracts prior to receiving Environmental Release. The grantee may sign these contracts only prior to Environmental Release at their own risk. No funds may be drawn down until the grantee receives both the Environmental Release and Release of Funds. Contact Megan Hruska if you have any questions.

Miss an edition of this newsletter?

All editions are posted to our website: in.gov/ocra/2782.htm. **Email us** if you have any problems viewing the newsletter, subscription questions or if you would like to suggest an article.
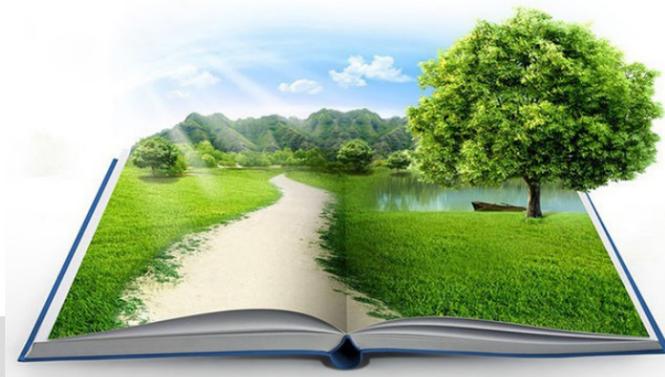
View our Calendar

The complete 2018 calendar is available on our website. [View it now!](#)

US Geological changes the Environmental assessment process

US Geological has changed the process for completing Environmental Assessments. The online application for is now available at https://igs.indiana.edu/eAssessment/ or at the [survey website](#) under the Services tab. While US Geological has automated the process of both submitting and responding to environmental assessments, Indiana Geological and Water Survey staff members are available to address any questions or concerns.

Now, the process has been updated. Complete your organizational information on the first page of the online Environmental Assessment form. At the bottom of the page, select the "Choose Project Location." This links you to an Indiana map and instructions for delineating your project area. After delineating your area of interest, select "Capture" and the map window closes (do not use the back arrow). Click the "Submit" button at the bottom of the Environmental Assessment page. A response is e-mailed to you within a couple of days. If you need more information, please contact US Geological at igsenvir@indiana.edu.

Environmental Review RROF publishing reminders

This is a reminder regarding how to count the state and local comment periods required following Request for Release of Funds (RROF) publication during the Environmental Review process. According to 24 CFR 58.21, "*the first day of a time period begins at 12:01 a/m/ local time on the day following the publication or the mailing and posting date of the notice which initiates the time period.*" Additionally, the RROF certification may not be signed until the local comment period is over, which means it may not be signed on the last day of the local comment period.

Please see the following example regarding counting state and local comment periods. Keep in mind, the state comment period does not start until the Environmental Specialist receives the RROF certification, in addition to the ad and affidavit. The example below assumes the RROF is received on **January 19**. State comment period begins the day after the Environmental Specialist receives the RROF. Please contact [Megan Hruska](#) if you have any questions.

RROF Publish Date	January 1
Local Comment period starts	January 2
Local Comment period ends	January 17
On or About Date *(sign the RROF)*	January 18
RROF is received	January 19
State Comment period starts	January 20
State Comment period ends	February 4
Environmental Release	February 5

Grant administrator certification trainings dates are available

Since 1994, the State has required formal certification of all persons administering Community Development Block Grant (CDBG) projects in Indiana. The information below outlines the certification process and explains how to become certified.

The CDBG certification process has been established for the following reasons:

- This program involves complex administrative and financial procedures regulated by federal and state policies. Knowledge of the applicable regulations and policies is essential to achieve a high level of efficiency in the oversight of grant awards. The needs of the constituents are more adequately met.

- Certification is like an insurance policy that protects grantees from unnecessary monitoring findings due to inexperienced administrators.

Grant Administrator Certification	**101** - April 11 and September 12 (1 day course, offered twice)
	201 - July 10-12 (3 day course, offered once)
	301 - September 5-7 (3 day course, offered once)
	401 - TBD

Please note that the Grant Administrator Certification is one of the current polices being reviewed. More information will be released at a later date **[on our website](#)**.

Are you submitting a claim for a draw down?

Before a claim can be processed for construction costs, you will need to submit Labor Forms 7, 8, 9, and 12, and receive approval by Grant Services' Labor Standards specialist, Beth Dawson.

The Auditor's office states that once a claim is submitted, it must be timely processed and returned to the community. If a quick processing time is not followed, the claim would then need to be resubmitted (with a new signature date) after the Labor forms are approved.

In order to ensure this process runs smoothly, Labor Forms 7, 8, 9, and 12 need to be submitted to Grant Services two weeks prior to submitting a Claim Voucher for construction costs. This allows time for the Grant Administrator to submit any additional necessary information. To avoid delays, ensure all of the information is correct and complete, including dates and descriptions of line items.

Environmental fees and administration claims can be paid after Release of Funds is received and contracts are executed.

Welcome to the staff members

Over the past few months, we have welcomed two new staff members. Introduce yourself and get to know them both!

Emily Brackemyre joined the Grant Services team. Reach her at (317) 232-8031 or [email her!](#)

Andrea Kern is the new North East Community Liaison. Reach her at (317) 607-4821 or [email her!](#)

- [View here to view our CL map](#)

Stellar Communities Program now has a regional focus

The Stellar Communities program update was announced on Jan. 31 with Lt. Governor Suzanne Crouch and Jodi Golden, OCRA's Executive Director. Mayors and representatives from twelve different cities came to Rushvile for the announcement. The program update now requires a minimum of two or more communities to partner to create a region. The LOI submission process is now completed through Foundant, an online grant management system. All regions must submit the required documentation via Foundant, in order to be considered. A LOI demo video and a FAQ are available. Letters of Intent are due online by **April 6 at 4 p.m. (EST)**. No paper submissions will be accepted and submission entered after 4 p.m. will not be eligible. Visit in.gov/ocra/stellar for more information.

Apply to one of the open ISDA grants before the deadline

The Indiana State Department of Agriculture (ISDA) has two grants that are open for applications. All of this information can also be found on their website at in.gov/isda/2474.htm.

Specialty Crop Block Grant
The purpose of the Specialty Crop Block Grant Program (SCBGP) is to solely enhance the competitiveness of specialty crops. Specialty crops are defined as "fruits, vegetables, tree nuts, dried fruits, horticulture, and nursery crops (including floriculture).

Proposals are due March 26, 2018 by 5 p.m. (EST). For more information about the Specialty Crop Block Grant Program, please reference the following documents or contact Ann McCambridge at (317) 419-0200.

- Application Template
- Program Guidance
- Program Q & A

Clean Water Indiana Grants
The Clean Water Indiana (CWI) Program was established to provide financial assistance to landowners and conservation groups. The financial assistance supports the implementation of conservation practices which will reduce nonpoint sources of water pollution through education, technical assistance, training, and cost sharing programs. The CWI fund is administered by the Division of Soil Conservation under the direction of the State Soil Conservation Board.

Learn more