

Section 1

Introduction

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1.0 Purpose

This Administrative Manual is provided to assist Louisiana Disaster Recovery Community Development Block Grant grantees and Subrecipients (parishes and units of local government) in implementing disaster recovery grants. It provides guidance regarding the general requirements included in all Cooperative Endeavor Agreements (CEAs) that apply to parishes and units of local government. It is the responsibility of each grantee to ensure that all provisions of this manual, federal rules and regulations, and grant award are complied with. Grantees must also carry out proper and efficient grant administrative practices. Should questions arise, grantees should immediately contact the Louisiana Office of Community Development, Disaster Recovery Unit (OCD-DRU).

2.0 Background

Disaster Recovery CDBG grants are authorized by the United States Congress and the President of the United States under supplemental appropriation laws. (“Supplemental Appropriations Acts” authorize CDBG funding.) Specific requirements are typically included in the appropriation law adopted to cover a specific disaster. These requirements may modify, or authorize HUD’s Secretary to modify, various statutes and regulations that could impede the prompt implementation of disaster relief and associated community development programs. Notice of waivers and alternate requirements are published in the Federal Register (See Exhibit 1-1 and Exhibit 1-2).

The entity having responsibility for designing and administering the Grant Programs depends upon the nature of the disaster. In recent catastrophic disasters, e.g., Katrina/Rita, Gustav/Ike, the Congress left the design and implementation of the disaster relief programs to the affected state government(s). HUD’s role was to: work with the states to ensure the designs of the action plans (and amendments) were acceptable; grant waivers of existing statutory requirements and the associated implementation regulations; define alternate requirements when necessary; and, monitor state implementation activities. The states in turn submitted action plans and amendments covering their programs to be implemented as part of the disaster recovery effort. The action plans and amendments were submitted for acceptance by HUD, thus assuring the proposed actions were within the intent and spirit of existing statutes.

The action plans, as amended, define the scope of and allocate the funds appropriated to the programs described. Upon acceptance by HUD, the states implemented each program or delegated the responsibility to grantees and their Subrecipients. The delegation of responsibility is accomplished via Interagency Agreements (IAs), Cooperative Endeavor Agreements (CEAs), or conditions of grant awards associated with the program.

Individual projects are implemented through an application process and associated grant award. This award will define the activities to be undertaken and establish a budget for the project. It also contains requirements that the grantee must comply with. Each grantee must become

familiar with the terms of the CEA, grant awards, and associated statutory and regulatory waivers.

3.0 Grants Management Requirements – Transition to 2 CFR Part 200

Effective December 26, 2014, the Department of Housing and Urban Development (HUD) announced the transition to 2 CFR Part 200, a new regulation governing uniform administrative requirements, cost principles, and audit requirements for federal financial assistance provided to non-federal entities. This regulation consolidates numerous OMB circulars and regulations pertaining to uniform administrative requirements such as 24 CFR Parts 84 and 85, into one Code of Federal Regulations.

The new 2 CFR Part 200 applies to all grants awarded by the OCD-DRU beginning January 1, 2015. In addition, per HUD, the new regulation is also applicable to the use of funds for grants awarded after December 26, 2014, yet work and expenses were carried over into 2015 or later. The new regulation is also applicable to additional funds awarded in 2015 or later to grants awarded prior to December 26, 2014. All applicable references to 2 CFR Part 200 are now reflected in the Grantee Administrative Manual.

4.0 Resources

Exhibit	Topic
Exhibit 1-1	Katrina/Rita Disaster Recovery Waivers
Exhibit 1-2	Ike/Gustav Disaster Recovery Waivers
Exhibit 1-3	Isaac Disaster Recovery Waivers