

# **Putnam County Community Development Block Grant — Disaster Recovery Infrastructure Program Policies and Procedures**

December 31, 2019



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## SUMMARY

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The U.S. Department of Housing and Urban Development (HUD) allocated Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the State of Florida Department of Economic Opportunity (DEO). This funding is being distributed in federally-declared disaster counties impacted by Hurricane Matthew including Putnam County for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code (U.S.C) 5301 et seq.) and described in the State of Florida CDBG-DR Action Plan. DEO has provided \$3,569,507 in CDBG-DR funding to Putnam County to provide flood and drainage improvements to St. Johns Avenue in the incorporated area of the City of Palatka.

The County entered into a subrecipient agreement with DEO to administer the infrastructure recovery program including the following projects:

- St. Johns Avenue Drainage Infrastructure Improvements

This document describes policies and procedures for the Infrastructure Program.

Of the \$3,569,507 allocated to Putnam, all \$3,569,507 has been set aside for the infrastructure project listed above. Budget allocation for the project was determined based on estimations when the project was initially identified. Project costs are not anticipated to change significantly based on the existing project cost estimations.

## VERSION HISTORY

### *Putnam County CDBG-DR General Policies and Procedures*

Version	Date	Page	Description
1.0	11/1/2020	All	
2.0			
3.0			

## **VERSION POLICY**

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Version history is tracked in the table above, with notes regarding version changes. The dates of each publication are also tracked in this table. The first version of this document is 1.0.

Substantive changes within this document that reflect a policy change will result in the issuance of a new version 2.0, an increase in the primary version number. Future policy changes will result in additional revision and issuance of a new primary version number.

Non-substantive changes within this document such as minor wording and editing, or clarification of existing policy, that do not affect the interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase after the primary version number. Such changes would result in a version number such as 2.1, 2.2, etc.

## **POLICY CHANGE CONTROL**

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Policy review and changes for the Putnam County Infrastructure Program are considered through a change control process. When policy clarifications, additions, or deletions are needed to more precisely define the rules by which the Program will operate, Program staff will discuss potential changes with the Board of County Commissioners for their review and consideration. Their consideration will include a determination as to whether the action is a policy or process issue. Actions identified as policy issues will require review and determination by the Board of County Commissioners. The issue will be discussed by the Board at a workshop meeting.

The Board will make a decision to approve the change, deny the change, or defer action on the request. If the change is approved, the Program Manager will disseminate the new policy in a communication via email to all Program staff. If the Board decides to deny a change, no further action is taken. If a change is deferred, the Board will request additional supporting information as necessary and place the item on the next workshop agenda for consideration.

The Board of County Commissioners meets bi-weekly, as needed, to consider all pending requests but may meet as frequently as necessary to consider critical policy decisions. The Board has authority to review and approve policy changes, render decisions on individual case appeals, and review waiver requests to the existing program cap to be submitted to DEO for review and consideration.

## **INFRASTRUCTURE PROGRAM**

### **Program Overview**

The primary focus of the Program is to provide CDBG-DR funding assistance for infrastructure rehabilitation and improvement projects. Infrastructure projects must have been impacted by Hurricane Matthew and must be an eligible activity as defined by HUD. This

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program supplements other funds which may be available to conduct these projects. In some cases no additional funds are available and therefore the CDBG-DR funds are the sole source of funding for the project.

Putnam County will utilize CDBG-DR funds to add a piped conveyance system from the primary outfall to Kay Larkin Road and reshape the open channel conveyance system west of the primary outfall. The solution also includes the addition of more storm water pond storage and an improved overall structure. The proposed improvements include:

- Utilize the existing large ditches north of St. Johns Avenue from Kay Larkin Road to the primary outfall.
- Avenue for additional storage. Connect these large ditches to the main proposed storm trunk line by series of pipes North of St. Johns Avenue from Kay Larkin Road to the primary outfall for additional storage.
- Install large storm trunk line at center of St. Johns Avenue
- Center location within St. Johns Avenue is optimal location due to conflicts with existing major utilities, proposed utilities, and location of proposed 10' bike path.
- Proposed trunk line will be 43"x68" ERCP or equivalent/greater than in capacity from Key Larkin Road to the primary outfall.
- Proposed trunk line will be 4'x8' box culvert or equivalent/greater than in capacity from the outfall to Kay Larkin Road.
- Drainage from St. Johns Avenue roadside ditches and ditches from side roads will be connected to the main trunk line via smaller pipes.
- Proposed construction includes milling and resurfacing of portions of the existing road.
- Also includes reconstruction and pavement addition in other portions of the road.
- Includes sidewalk repair and total sidewalk replacement of the south side of the road where impacts will occur.
- From CR 309C to the primary outfall, minor improvements are proposed in the form of reshaping roadside ditches.
- Relocation of conflicting utilities as needed.
- Reconstruction/Construction of proposed bike path to facilitate changes encountered from improvement.

Proposed improvements have been broken down into the following segments that reflect the priority work phases due to threat of flooding to critical facilities fronting St. Johns Avenue.

Segment I Off-Site Storm Ponds (necessary storm water outfall facilities)

Segment II from Outfall to Kay Larkin Drive (healthcare facilities)

The \$3,569,507 of CDBG-DR funding provided by the DEO will be utilized to design and construct the improvements of Segments I and II. For Segment I, (retention ponds and drainage outfall from St. Johns Ave) design and construction will involve relocating an existing retention pond, constructing an estimated 1,900 linear foot of drainage outfall, building a new road way cross culvert, and modifying and increasing the capacity of an existing retention pond. For Segment II (from Key Larking Dr. to the drainage outfall) design and construction will involve relocating utilities, installing a large trunk line at center of St. Johns Ave, roadway modifications, swale adjustments, and termination of segments such that the system is functional for segment II until future Segments commence. The downstream improvements will benefit a demographic of 59.59% Low-Mod Households that equate to 6,180 Low-Mod Income Households.

CDBG-DR funds are intended to principally benefit low- and moderate-income (LMI) persons. Funds are allocated to programs in a manner that ensures that at least 70 percent of the grant amount awarded is expended for activities that benefit such persons. Funds will be used to address remaining unmet infrastructure needs and to support the long-term recovery and restoration of infrastructure in the most impacted and distressed areas.

The primary objective of this Program is to address the unmet infrastructure recovery needs in (LMI) qualified service areas. LMI qualified areas are those areas where 59.59% of the households or greater are LMI qualified.

## **National Objective**

The Program will meet one of the following National Objectives:

- Benefit to Low- and Moderate-Income Persons

The County's CDBG-DR Programs are designed to ensure that 70% of CDBG-DR grant amount awarded is expended for activities that benefit low- and moderate-income persons. To that end, the Program prioritizes assistance to projects with LMI qualified service areas.

## **Eligible Activities**

The eligible and ineligible categories of activities are determined by HUD. All activities and potential projects must be compliant with CDBG National Objectives per 24 CFR 570.208 and CDBG Eligible Activities per 24 CFR 570.201 through 570.207. The following activities under the Housing and Community Development Act of 1974 (HCDA) are eligible for public facilities and improvements:

- Acquisition
- Construction,
- Reconstruction
- Rehabilitation (including removal of architectural barriers to accessibility), or
- Installation

All infrastructure projects will be compliant with these activities. All infrastructure projects must be public projects, with privately owned projects not being eligible for program funding. Under the Infrastructure Recovery Program, infrastructure will be defined to include:

- Roads
- Bridges
- Stormwater management systems
  - Conveyance systems (swales, storm sewers)
  - Curbs/gutters
  - Outfall areas
  - Retention/detention ponds
  - Facilities utilized to manage, clean and convey stormwater include storm/septic combined systems
  - Stabilization materials and structures for stormwater conveyance
  - Berms
  - Dams
  - Other facilities or structures intended for the handling and conveyance of storm water
  - Other Low Impact Development stormwater management systems

- Sidewalks
- Potable water lines
- Potable water pumping, handling, cleaning facilities and structures
- Sanitary sewer lines
- Sanitary sewer pumping, handling, cleaning facilities and structures
- Other infrastructure facilities and structures as determined by County staff.

## **ELIGIBILITY REQUIREMENTS FOR INFRASTRUCTURE PROGRAM**

All activities to be funded in whole or in part with CDBG-DR funds must be found to be eligible under Title I of the Housing and Community Development Act.

### **Geographic Location**

Any infrastructure project to receive funding under the infrastructure recovery program must be located within the legally recognized boundaries of Putnam County, Florida. This includes all municipalities which may be located within the County boundaries and all unincorporated areas within the County.

## Meeting a National Objective

All projects in the Infrastructure Recovery Program must meet the LMI National Objective. Infrastructure projects are anticipated to have to meet the LMI Area Benefit criteria. Other LMI benefit criteria may be identified as needed based on the nature and purpose of the project.

LMI area benefit projects must identify the potential service area of the activity. This can be defined using Census designated boundaries, direct service area if known (i.e. waterline which serves a specific municipality or neighborhood) or an estimated service area. It must be proven that the area is primarily residential to utilize the LMI area benefit. Where specific data can't be utilized such as Census data or other existing income information, a survey may need to be conducted.

**Census data** – Service areas may be able to be defined by Census geographic designations such as Census Tracts or Block Groups. When this data is used the most recent HUD provided data defined by Census geography designation must be used. The LMI information for these geographies must cumulatively meet the County Exception Criteria percentage.

**Survey data** – If a service area can't be reasonably defined by a Census designated geographic identifier (census tract, block group) then a survey may need to be conducted. If a survey needs to be conducted, the County will develop a survey methodology based on HUDs guidance for developing and conducting income surveys. The methodology will be presented to DEO for review and approval. Upon approval by DEO the County will develop a notification letter, survey and information form as part of the survey process. The County will mail the notification letter and the survey to all potential residential households identified in the service area. This will be conducted a minimum of one week (approximately 7 days) prior to conducting door-to-door surveys and will notify residents of the upcoming survey. It will also inform individuals of the purpose of the survey and describe the project in question which may be undertaken in the service area. Staff to conduct the door-to-door surveys will be identified at least one week before the door-to-door surveys are to occur. Areas identified for survey may be evaluated by a site visit and evaluation ahead of time to determine the survey route and identify any potential dangers or other issues. Surveys will be conducted in a team of at least two program and/or county staff members. While conducting the survey staff will provide residents with the survey along with the information form describing the purpose of the survey and a project description. Residences which don't wish to complete the survey or who are not available will be noted for later evaluation of survey results. Residents who refuse to complete the survey will be assumed to **not** be income eligible and noted as such. Residents who were not available at the time of the survey will have the information form and survey mailed to them again along with a self-addressed envelope for them to complete and return to the County. A determination will be made based the response to the mailed surveys as to whether or not additional efforts need to be made. Once the County determines that no other efforts should be made the surveys will be evaluated to determine potential LMI eligibility of the area.

Maps and related service area information, such as a written determination and justification of the service area, will be included in the specific project folder.

## Tie-Back

Any project identified under the County's Infrastructure Program must respond to a direct or indirect impact from the Hurricane Matthew (DR-4283) disaster event. All projects will be



evaluated to determine whether the infrastructure involved in the project and subject to CDBG-DR funding was impacted by the associated storm event. Evidence of tie back which the County will utilize include:

- Photographic evidence from the storm event
- Reports or other notification from federal, state, county, or municipal officials indicating impacts from the storm event
- Federal, state, county, or municipal storm damage summary reports, road closure listings or other storm related reporting
- Verified reporting by residents or witnesses. Must be documented and signed by residents providing information
- Newspaper or other media reporting indicating impacts from the storm event
- Flood modeling which indicates inundation/flooding at the site of specific infrastructure projects, particularly for stormwater management systems.

Evidence of tie back such as reports, staff documentation or maps will be included in the specific project folder.

## **Expenditure of Funds**

All projects will be evaluated to determine if the project can be completed and CDBG-DR funds fully expended within the expenditure period for those funds. Project construction must be able to be completed and finalized within the required period of time to be eligible for consideration. Projects utilizing funds described in Federal Register Volume 82, Number 150 must have their funds fully expended within 6 years of HUD's execution of the grant agreement unless otherwise revised by HUD or DEO. All projects require an estimated work schedule indicating a time schedule for project completion. This schedule will be refined once a contractor is selected and a construction schedule is provided by the contractor. In order for the project to be initially eligible it must be determined or confirmed, by County staff, that an estimated project schedule will meet the expenditure of funds time requirement. All work/construction schedules must indicate completion within the expenditure time period. In order to ensure the timely expenditure of funds projects will also be evaluated for scale, complexity and cost. Complications with factors such as these may inadvertently put expenditure time requirements at risk.

## **Funding of Last Resort**

The Infrastructure Program will evaluate each project to ensure that CDBG-DR funds are used only as the recovery funding source of last resort. Projects developed and/or funded by Putnam County will be reviewed for applicability and eligibility against other Federal disaster recovery funding before being considered for CDBG-DR funding. All other potential funding sources must be confirmed and documented, in accordance with DEO provided policy and procedures for duplication of benefits recordation, before a CDBG-DR funding amount will be determined. CDBG-DR funds will not be used as repayment for other funding expenditures but may be used as match for infrastructure recovery projects.

## **Duplication of Benefits**

All infrastructure projects must be evaluated to determine potential duplication of benefits issues. A Duplication of Benefits occurs when financial assistance received from one source is provided for the same purpose for which CDBG-DR funds are provided (in accordance with

Section 312 of the Stafford Act and HUD guidance in the November 16, 2011 Federal Register Notice (FR-5582-N- 01)). As part of the Funding of Last Resort analysis, all infrastructure projects will also be evaluated to identify any and all other funding which may warrant a duplication of benefits. This includes both funds currently available and funds which may be made available in the future for the same project. Some of these funding sources include but are not limited to:

- FEMA National Flood Insurance Program (“NFIP”);
- U.S. Army Corps of Engineers (“USACE”);
- U.S. Department of Transportation, including the Federal Highway Administration (“FHWA”)
- Federal Transit Administration (“FTA”);
- Federal and state Department of Transportation (“CDOT”)
- Federal Economic Development Agency (“FEDA”);
- Federal Emergency Management Agency (“FEMA”)
- U.S. Food and Drug Administration (“FDA”)
- Private Insurance;
- Increased Cost of Compliance (“ICC”);
- State of Florida state grants/loans;
- Philanthropic funds;
- Any other funding source that may duplicate assistance

## **ENVIRONMENTAL REVIEW**

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All infrastructure projects must undergo an environmental review as required and described in 24 CFR Part 58. Once a project is identified and funding is confirmed the project will be forwarded to the designated ER vendor. The ER process is conducted in accordance with the protocols set forth by the Florida Department of Economic Opportunity which are outlined on their website (<http://www.floridajobs.org/community-planning-and-development/assistance-for-governments-and-organizations/florida-small-cities-community-development-block-grant-program/environmental-review-process>). Please reference that document for ER process. All necessary ERs must be completed before construction or acquisition funds are expended and before any “choice limiting actions”, as defined by HUD, are made. This includes the signing of any required documents by authorized County staff, accommodation and inclusion of requests or requirements by any agencies or groups as part of the consultation process, posting and submittal of any necessary Finding of No Significant Impact (FONSI), Notice of Intent/Request for Release of Funds (NOI/RROF) documents, submittal of ER documents to DEO (as may be requested) and receipt of RROF approval from DEO. Any additional environmental actions that may be required which substantially change expenditure timeline or increase the cost of the project may make the project ineligible for funding.

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## **CONTRACTOR PROCUREMENT**

This County will procure architecture and engineering services, as needed, for infrastructure projects. Procurement of architecture and engineering services may occur through the publication of a Request for Qualifications. The County will also publish a Request for Proposal for construction for each infrastructure project identified by the County. Procurement for all infrastructure recovery program projects are subject to the procurement regulations established under 2 CFR Part 200 (See Appendix A, Putnam County Procurement Ordinance). Procurement will be conducted so as to comply with federal, state and local requirements. Procurement must meet public procurement requirements and occur in a fair and open

process. All RFQs/RFPs will be conducted in conformity with HUD requirements for public procurement. This will include publication of the

RFQ/RFP through the Vendor Link online advertising systems as well as in a paper of local circulation. The County's contractor will distribute the RFQ/RFP for distribution to contractors for additional services. The County will also solicit potential contractor employees from the Palatka Housing Authority by requesting resumes of potential applicants and providing them to the contractor. The details of the County's procurement process are provided in the County's procurement ordinance (see Appendix A).

Projects will be awarded to vendors/contractors based on the criteria established in the County's procurement ordinance (see Appendix A) and the requirements set forth in 2 CFR 200.318- 200.326. . Vendors/contractors who are awarded an infrastructure project will be required to read and sign a contract with the County providing specific requirements, obligations and responsibilities of both the County and the contractor. Refusal to sign the contract will result in termination of award and the next eligible contractor will be selected for award.

## **CONSTRUCTION SERVICES**

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Construction services consist of three primary components. The preconstruction, construction and close-out. This includes all activities which occur after the bid has been awarded and contracts between the County and the contractor have been signed. All projects will be evaluated before the preconstruction phase begins to ensure that the project is prepared to proceed. This evaluation will include a final review of any plans or specifications, confirmation of environmental clearance, verification that all land ownership and right-of-way issues are resolved and confirmation that all other programmatic requirements are met. Any issues pertaining to these items must be resolved before construction begins.

### **Preconstruction**

All infrastructure projects will require a mandatory preconstruction meeting. This meeting will include the contractor, CDBG-DR staff, architect/engineer and any County or municipal staff engaged in the project. The meeting will take place at the project site if possible and reasonable. During the preconstruction meeting the following items will be addressed:

- Labor compliance (Davis-Bacon wages)
- Payroll reporting
- Section 3 requirements
- Project signage
- Site safety
- Work schedule
- Payment/invoicing procedures
- Change orders
- Inspection reporting
- Permitting
- Discuss any issues identified as part of the project evaluation before preconstruction

Any issues or concerns regarding the project before construction should be raised and addressed at this meeting.

## Construction

This phase of the project begins after the issuance of the proceed order and after the preconstruction meeting. Both of these items had to have occurred to move to the construction phase. This phase will include all construction related activity and the required monitoring and compliance oversight associated with those activities. Disaster recovery staff will be responsible for monitoring each project to ensure it conforms to the provisions of the contract established between the County and the contractor. Disaster recovery staff will also monitor each project to ensure compliance with any federal requirements associated with construction of the project and the utilization of CDBG-DR funds. Projects which have other funding sources secured by other entities such as local municipalities will require that those entities assume responsibility for compliance with their associated funding sources. The Infrastructure Program Manager or designee and/or Construction Inspectors provided by the County's CDBG-DR vendors will conduct site visits, confirm work completion for invoices, review change orders, assist with technical consultation, and coordinate with construction contractors hired by the County to help ensure the timely completion of the project. The Infrastructure Program Manager or designee and/or Construction Inspectors ensure that contractors act in accordance with program policies and procedures, adhere to standards of performance, and follow safety policies. The County CDBG-DR vendor will also provide assistance with overall compliance and monitoring of the projects.

**Invoicing** – All project invoicing and change orders will take place during the construction phase. Invoicing may occur in one of two methods depending on the estimated time schedule for completion of the project. Contractors will submit invoices to the Infrastructure Program either on a monthly basis or at the 30%, 60% and 90% completion points with 10% being held in reserve to be paid upon project completion. The 10% to be held in reserve will be applicable to both invoicing methods. The County will make a determination as to the necessary invoicing method to be agreed upon and secured in the construction contract between the County and the selected contractor. Invoices will be submitted to the Project Manager for review and confirmation of work completed. The Project Manager will review the invoice with the County's technical service provider to ensure compliance and to verify completion of work as needed. Upon approval of the invoice by the Project Manager as well as the technical service provider, the invoice will be sent to Finance for processing and payment.

**Change Orders** – All change orders must be submitted to the Project Manager for review. Change order may then be submitted to the County's CDBG-DR technical service provider for review. Change orders must be approved in accordance with the Putnam County Procurement Ordinance (see Appendix A)

The construction phase will conclude after final payment has occurred, all County inspections have been conducted and passed and the disaster recovery program staff inspect and certify the project as complete.

**Contractor Payment Schedule** - The Program will release award proceeds directly to the construction contractor either on a monthly basis or at 30%, 60%, and 100% of

construction completion as per the scope of work and the contract between the County and the contractor.

## Close Out

Close out will occur once the construction is complete and all draw downs of CDBG-DR funds have occurred. Both the County and disaster recovery staff must have conducted all necessary inspections and these inspections must have passed in order for close out to occur. This phase will include the completion and submittal of any required close out or reporting documentation required by DEO. Official close out will have occurred upon DEO's confirmation that all reporting is complete and that all funds for the project are expended.

## FEDERAL REQUIREMENTS

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**Davis Bacon Act** - The Project Manager or designee will conduct labor compliance activities in accordance with federal Davis Bacon Act requirements. The Davis-Bacon Act will apply to all infrastructure projects undertaken by the County. The Davis Bacon Act requires that workers be paid at least minimum wages established by the Department of Labor. Compliance activities will include verifying that payrolls are submitted weekly and that they contain comprehensive and accurate information. Staff will verify that accurate labor categories and wage determinations are identified and conduct required on site wage interviews.

**Section 3** - The Project Manager or designee will conduct activities and provide oversight to ensure compliance with Section 3 requirements. Section 3 is a provision of the Housing and Urban Development Act of 1968 whose purpose is to ensure that employment and contracting opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons. Section 3 is intended to ensure that when employment or contracting opportunities are generated from CDBG-DR funds, preference should be given to low- and very low-income persons or business concerns residing in the community where the project is located. In order to help ensure compliance with Section 3 requirements the Project Manager or designee will provide information and guidance to contractors awarded CDBG-DR funded projects. This will include potential hiring of Section 3 qualified employees and subcontractors as may be needed by the prime contractor. Staff will also provide contractors with a link to the Section 3 Business Registry to assist in the identification of Section 3 qualified firms.

**Contract Work Hours & Safety Standards Act** - The Project Manager or designee will conduct activities and provide oversight to ensure compliance with the Contract Work Hours & Safety Standards Act. Workers shall not work more than 40 hours/week unless they get overtime and projects must comply with federal safety standards. *Reference: 40 U.S.C. Chapter 47.*

**Copeland Anti-Kickback Act** - The Project Manager or designee will conduct activities and provide oversight to ensure compliance with the Copeland Anti-Kickback Act. Compliance will include ensuring that labor payments occur once a week and that only permissible payroll deductions will occur. The weekly payroll requirement applies to all contractors and subcontractors on construction projects that are over \$2,000. The weekly



payroll requirement does not apply to any County employees (they are considered “force account” labor and this does not apply). *Reference: 40 U.S.C. §3145 and 18 U.S.C. §874.*

**Fair Labor Standards Act** - The Project Manager or designee will conduct activities and provide oversight to ensure compliance with the Fair Labor Standards Act which requires compliance with federal minimum wage and overtime requirements. *Reference: 29 CFR Parts 510 to 794.*

**Architectural Barriers Act:** The Architectural Barriers Act (“ABA”) requires that buildings and facilities that are designed, constructed, or altered with federal funds, or leased by a federal agency, comply with federal standards for physical accessibility. ABA requirements are limited to architectural standards in new and altered buildings and in newly leased facilities. *Reference: 42U.S.C. §§ 4151 et seq.*

**Americans with Disabilities Act:** The Americans with Disabilities Act (“ADA”) prohibits discrimination on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications. It also applies to the United States Congress. *Reference: 42 U.S.C. 12101 et seq.*

**Section 504:** Section 504 states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under" any program, service, or activity that either receives federal financial assistance or under any program or activity conducted by any Executive agency. *Reference: 29 U.S.C. §794*

**Flood Disaster Protection Act of 1973:** Any projects identified as being located in a FEMA recognized special flood hazard area can only occur if the community in which the project is situated is participating in the National Flood Insurance Program (see 44 CFR parts 59 through 79), or less than one year has passed since the FEMA notification regarding such hazards. If a project is located in one of these areas the County must obtain flood insurance protection as a condition of the approval of financial assistance. The Flood Disaster Protection Act of 1973 (42 U.S.C. 4001-4128) as amended by the National Flood Insurance Reform Act of 1994 (Pub.L. 103-325, 108 Stat. 2160) prescribes the duration and dollar amount of flood insurance under Sections 3 and 102 of the Act. Section 582(c) of the Community Development and Regulatory Improvement Act of 1994 mandates that "...The requirement of maintaining flood insurance shall apply during the life of the property, regardless of transfer of ownership of such property" (42 U.S.C. 5154a).

## MONITORING AND COMPLIANCE

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Putnam County will conduct ongoing compliance and monitoring oversight through the life of the Infrastructure Recovery Program. Disaster recovery staff will provide technical assistance to contractors through the life of each infrastructure project. Monitoring and technical assistance will be focused on the following objectives:

- Reviewing and monitoring funded projects for compliance with Federal regulations, funding requirements, and program policies and procedures.
- Providing guidance for continuous improvement of program delivery.
- Assistance in identifying and preventing issues.
- Setting program performance standards.

- Completing and providing necessary reporting for DEO.
- Ensure the quality of the financial management process

Ongoing compliance will be conducted by the Project Manager and/or their designee as well as any other assigned County staff.

Their monitoring responsibilities will include but not be limited to:

- Review the program's fiscal controls and accounting procedures for compliance with County, State, and federal regulations.
- Policy & Compliance - Examining the infrastructure program's compliance with HUD, DEO and County regulations.
- Crosscutting Requirements - Investigating the infrastructure program's compliance with crosscutting federal rules and regulations such as Davis-Bacon, labor standards, the Architectural Barriers Act, the Americans with Disabilities Act, and other federal requirements.

The Project Manager will be responsible for addressing any inconsistencies and discrepancies identified.

## PROGRAM INCOME

Any funds which may be recaptured through subrogation of DOB will be recorded as program income. This may occur when other funding assistance for the same infrastructure project is provided to the County for an infrastructure project after CDBG-DR funds have been allocated to the project. In this case the additional funding is considered duplicative and must be accounted for as part of the DOB process. These funds will be collected by the County and designated as program income for the disaster recovery program. Program income collected under the infrastructure program will be returned to DEO for processing.