

STATE OF ALABAMA)
COUNTY OF BALDWIN)

RESOLUTION #2026-069
OF THE BALDWIN COUNTY COMMISSION

RESOLUTION TO APPROVE THE COMMUNITY DEVELOPMENT BLOCK GRANT – DISASTER RECOVERY (CDBG-DR) LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION GUIDANCE

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) approved the Alabama Department of Economic and Community Affairs' (ADECA) 2022 Community Development Block Grant – Disaster Recovery (CDBG-DR) Action Plan for Disaster Recovery on January 12, 2023, with a substantial amendment approved on July 21, 2023, establishing the Local Recovery Planning Program (LRPP); and

WHEREAS, Baldwin County, Alabama, (the "County") has received an allocation of Community Development Block Grant – Disaster Recovery (CDBG-DR) grant funding from the ADECA; and

WHEREAS, the Baldwin County Commission (the "Commission") entered into Subrecipient Agreement No. DR-21-001 with ADECA on October 17, 2023 concerning the CDBG-DR grant funding; and

WHEREAS, the Commission Approved Amendment No. 1 to Subrecipient Agreement Number DR-21-001 between the Baldwin County Commission and the ADECA, due to the approval of the Local Recovery Plan (LRP); and

WHEREAS, as outlined in the County's approved LRP, ADECA allocated \$13.3 million in CDBG-DR funds to LGRIP for the County to distribute among local municipalities (cities, towns, and utility districts) for infrastructure investments that address recovery from damage caused by Hurricanes Sally and Zeta, mitigate future disaster impacts, and enhance quality of life for vulnerable populations; and

WHEREAS, LGRIP supports eligible projects such as roadway extensions, drainage system upgrades, flood mitigation improvements, broadband expansion, and the restoration of critical public facilities; and

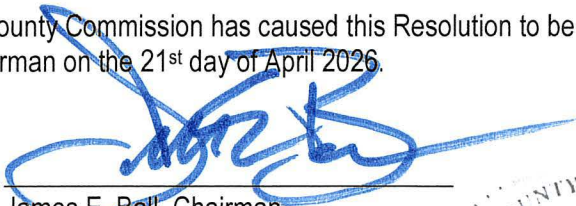
WHEREAS, under the LGRIP program, all fourteen municipalities and eligible public utility providers within the County have been contacted to inform them of available technical assistance and to invite their participation in the competitive application process; and

WHEREAS, the LGRIP Application Guidance document has been developed to describe recovery program information and eligibility standards to guide applicants in their competition for recovery program funding through the LGRIP; and

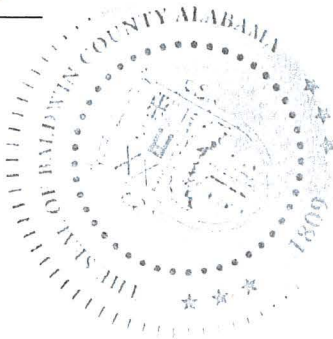
WHEREAS, the LGRIP Application Guidance document is intended to provide an overview of the priorities, parameters, and requirements corresponding to the CDBG-DR program funding.

NOW, THEREFORE, BE IT RESOLVED BY THE BALDWIN COUNTY COMMISSION, that the CDBG-DR LGRIP Application Guidance document, a copy of which is attached as Exhibit "A" and incorporated herein by reference, is hereby **APPROVED**.

IN WITNESS WHEREOF, the Baldwin County Commission has caused this Resolution to be executed in its name and on its behalf by its Chairman on the 21st day of April 2026.



James E. Ball, Chairman
Baldwin County Commission



ATTEST:



Roger H. Rendleman
County Administrator

EXHIBIT A:
RESOLUTION #2026-069



CDBG-DR Local Recovery
Local Government Recovery
Infrastructure Program
Application Guidance

March 2026

LGRIP Application Guidance

Contents

Overview	3
About LGRIP and CDBG-DR	3
Eligible LGRIP applicants	4
LGRIP Application Process	4
Project Application Set Up	4
LGRIP Application Phase I	5
Phase I Portal Guidance	6
Storm Tie Back	7
Project Eligibility Review	7
LGRIP Application Phase II	7
Phase II Portal Guidance	8
Identify the Project Location	10
Defining the Service Area	10
Service Area Priorities	10
National Objective	12
Project Context and Feasibility	14
Project Schedule	15
Project Budget	15
Defining Beneficiaries	16
Addressing Unmet Needs and Impacts	16
Critical Infrastructure	16
Sustainability and Resilience Measures	17
Organizational Capacity	17
Alignment and Coordination	18
Phase II Application Checklist	18
Phase II Application Scoring	22
LGRIP Phase III	25
LGRIP Application Guidance Appendix	28
Completing the Budget Template	28
Cost Principles	28
Cost Types	28

Post-Award Project Requirements.....29

 Environmental Review29

 Labor Compliance.....29

 Section 3.....30

 Procurement/Contracting29

 Duplication of Benefits (DOB)29

 Meeting 2 CFR 200 Requirements.....30

Cost Reimbursement.....30

 Document Staff Time and Contractor and Subrecipient Costs.....30

Overview

Baldwin County is pleased to provide a funding opportunity for community recovery of infrastructure through the Local Government Recovery Infrastructure Program (LGRIP). LGRIP is funded through the Community Development Block Grant – Disaster Recovery (CDBG-DR) allocation provided to Baldwin County from the State of Alabama Department of Economic and Community Affairs (ADECA). These funds are administered through the U.S. Department of Housing and Urban Development (HUD) and must comply with applicable federal regulations. The conditions that apply to these funds and projects under LGRIP are detailed in the Baldwin County Local Recovery Plan (LRP) found at

<https://baldwincountyal.gov/departments/grants/cdbg-dr/baldwin-county-local-recovery-plan>.

This guidance document contains information and requirements for applicants to apply and compete for LGRIP funds. This document is intended to provide an overview of the priorities, program components, and requirements based on the funding source and the LRP. Potential applicants are advised to read the guidance carefully. Project proposals will be reviewed and selected based on the completed application and the information provided. Please note that, due to the limited amount of funding, not all projects may be funded.

About LGRIP and CDBG-DR

LGRIP focuses on assisting local governments, public and nonprofit utility providers, and tribal communities to repair or improve public infrastructure damaged by Hurricanes Sally and/or Zeta. CDBG-DR funds may be used for repairs and improvements to infrastructure that demonstrate an unmet recovery need remains from the disaster, that other possible sources for funding have been exhausted or are unavailable, and that the project is critical to restoring and making the community more resilient.

The Baldwin County Local Recovery Plan provides an assessment of remaining recovery needs within the county and provides further detail on the LGRIP program and how the County intends to invest the CDBG-DR funds into the community to meet the identified disaster recovery needs.

Corresponding to the LRP, the program will focus on two primary activities eligible for CDBG-DR funds:

- Sewer and drainage improvements
- Roadway improvements

Through the review of supporting documentation, other recovery projects that may be considered for funding include:

- Repair or rebuilding of structures or recreational facilities, or other public systems damaged by Hurricanes Sally or Zeta;
- Implementation of mitigation measures that address infrastructure or facility failures of function during Hurricane Sally or Zeta;
- Hardening existing structures to prevent damage or infrastructure failure from future disasters; and
- May include mitigation activities within the project.

Additionally, selected LGRIP projects must meet CDBG-DR eligibility requirements (e.g., it must be an eligible activity, meet a national objective, and comply with all applicable rules and regulations), in addition to requirements of other funding sources and the locality administering the project.

Eligible LGRIP applicants

Municipalities, public and nonprofit utility providers, water districts, tribes, and other public entities operating within Baldwin County are eligible to apply for LGRIP funding to address qualifying roadway, water, sewer, drainage, or public facility repairs remaining from Hurricanes Sally and/or Zeta.

LGRIP Application Process

For an efficient application process, the LGRIP Application has been divided into two phases. Phase I determines and confirms an applicant’s eligibility through general information, and Phase II seeks documentation to describe the need, sustainability, and the applicant’s ability to execute the project. All information requested in Phase I is required for the phase to be considered complete. If the Phase I proposal is deemed suitable per CDBG-DR and LGRIP requirements, applicants will be invited to complete Phase II to provide further details on project scope, funding, and feasibility. All required application information is described in the instructions provided below; successful applicants must meet all the submission requirements described. Please note, the Phase II Application Checklist details additional information that applicants are not required to provide but may find useful in successfully explaining the proposed project. Phase II proposals will be reviewed and scored on a standardized, scaled rubric to determine the projects and activities recommended to the Baldwin County Commission and ADECA for consideration.

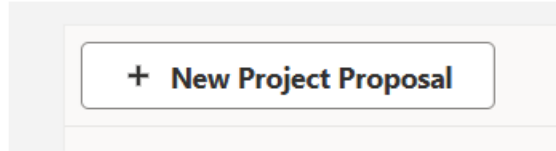
Following advertisement of the formal commencement of the Local Recovery Program implementation, and solicitation of LGRIP applications from eligible organizations, applications will be received via online portal by the following dates:

Application Phase	Submission Deadlines
Phase I	2/13/26
Phase II	5/4/26

Project Application Set Up

1. Prior to submitting an application for consideration, LGRIP-eligible organizations must notify Baldwin County at BCCGrants@baldwincountyal.gov stating their interest as a prospective applicant. The County will set up a profile, or “Organization” for the applicant within the Baldwin County LGRIP Application Portal (The Portal). Eligible organizations will receive an email from BCCGrants@baldwincountyal.gov containing their login credentials, once the “Organization” has been created by Baldwin County within The Portal.

2. Once the point of contact receives an email with the username and password, go to the website and enter the credentials to access The Portal.
3. Click “New Project Proposal” at the top of the page.



4. A popup box will appear. Provide the requested information and save.

A screenshot of a "Project Proposal" popup form. The form has a title bar with "Project Proposal" and a close button (x). The form contains five input fields: "Project Name", "Point Of Contact", "Phone Number", "Email", and "Description". At the bottom of the form are two buttons: a blue "Save" button and a white "Cancel" button with a gray border.

Please note: Application submissions are limited to a single project per proposal. If applicants wish to submit proposals for multiple projects, an application must be submitted for each individual project.

5. After a project proposal has been created and saved, an email will be sent to the designated point of contact email, indicating that Phase I of the application process is open for your project submittal.

LGRIP Application Phase I

Phase I of the LGRIP application seeks the information needed to determine a project's eligibility for CDBG-DR funding. By describing the proposed activity, tie back to storms, and estimated budget information, Baldwin County can determine if projects qualify as meeting the baseline eligibility requirements for the grant.

Timeline for Phase I:

- Portal access request must be submitted to Baldwin County by 5:00 p.m. CST on February 6, 2026

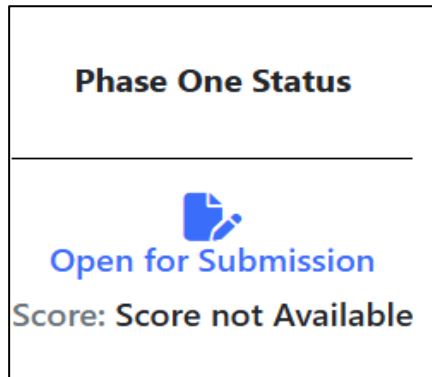
- Phase I Submissions due by 5:00 p.m. CST on February 13, 2026
- Baldwin County reviews and provides notification of project eligibility by March 4, 2026

Phase I Portal Guidance

1. After receiving the Phase I approval email from Baldwin County, applicants will need to login to The Portal using the same credentials as provided previously. Once logged in, The Portal dashboard will show the details of the project.
2. Click on the “Details” box for the project you are completing the application for.

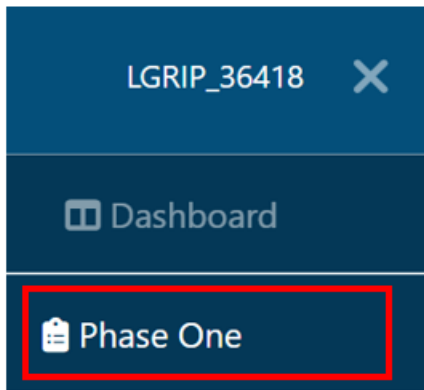
Project Name	Email	Status	Phase One Appr...	Phase Two Appr...	Phase Three Ap...	Is Active		
TEST 1	TEST Application	New	✓	✗	✗	✓	Details	History

3. A new window will pop up, showing both the Organization Info and Organization Status. Phase One Status will show as” Open for Submission,” indicating that your organization may prepare and submit phase one of the application. As this is the start of the application process, the status will read “Score not Available.” This will be updated during the review period.



4. Navigate to the left sidebar, which contains the site menu that can be either collapsed or expanded to include labels with icons. Click “Phase One” to navigate to the application.

Expanded:



Collapsed:



5. Once all required sections are complete and required documentation has been uploaded, save the application and click “Submit for Review.”

<input type="button" value="Save Form"/>	<input type="button" value="Submit for Review"/>
--	--

6. Once “Submit for Review” is clicked, the application is submitted to Baldwin County for review. Your organization will receive an email acknowledging the application submission.

Note: If you submit your application without providing all information intended, please contact BCCGrants@baldwincountyal.gov.

Storm Tie Back

All CDBG-DR funded activities must directly or indirectly “tie back” to Hurricanes Sally and/or Zeta by addressing a disaster-related impact and describing proposed restoring of infrastructure.

Applications need to demonstrate how the proposed project and recovery need were created by the effects of the storm(s). Applicants must provide documentation showing the storm impacts that relate to the proposed recovery project. Tieback may also be indirect, such as restoring or revitalizing an area that experienced losses or access due to storm damages in nearby areas. Documentation for tie back may include post-disaster assessments, satellite photos, before and after pictures, news articles, topography studies, damage inspections, engineering reports, and/or insurance estimates.

Project Eligibility Review

Following Phase I submission, Baldwin County will review the proposals for eligibility. Basic eligibility standards include storm tie back and that the proposed project represents an approved activity.

Applications will be reviewed for completeness and eligibility with CDBG-DR requirements. Projects that do not demonstrate cause or tie back to Hurricanes Sally and/or Zeta, or projects that focus on activities not eligible for CDBG-DR funding, will not be invited to participate in Phase II of the application process.

Phase I scoring has a total of 5 (five) possible points. A point is awarded for completing each question and providing supporting documentation for tie-back that shows impacts from the eligible storms. After the application has been reviewed, the point of contact will receive an automated email stating the “most recent phase of your project proposal has been reviewed.” Upon receiving this email, you may log back into The Portal to view your project’s Phase I score. Applications must receive 5 (five) points to be invited for Phase II.

LGRIP Application Phase II

If an application demonstrates project eligibility in Phase I, the point of contact will receive an email notification that their proposal has been approved to move to Phase II of the application process. This email indicates that the applicant is now able to complete Phase II for the proposed project. Phase II will only be accessible through invitation from the Baldwin County

Grants Department. The following instructions provide explanations, definitions, and expectations for responses and supporting documentation. A checklist is provided to guide applicants through the application, identify application requirements and documentation and note appropriate additional information that an applicant may include to provide further detail (Appendix: *Phase II Application Checklist*).

Phase II applications will be reviewed and scored according to a standardized rubric with multiple criteria. The rubric was developed based on inputs received during the LGRIP Stakeholder Capacity Building sessions held between October and December 2024. The scoring rubric is included in the Appendix *Phase II Application Scoring*, with details on the criteria that determine the score to be received within each scoring area. Once reviews are complete, projects will be provided to the Baldwin Commission for consideration of award. Selected projects must be submitted to ADECA for final approval (see *LGRIP Phase III*).

Timeline for Phase II:

- Application Submission due 5:00 p.m. CST on May 4, 2026
- Completion of review with scoring rubric and recommendation to Commissioners within 30 days
- Projects selected at June 16, 2026 Baldwin County Commission meeting

Phase II Portal Guidance

1. Login to The Portal and click the “Details” box next to your project to view and complete Phase II of the application.

Project Name	Email	Status	Phase One Appr...	Phase Two Appr...	Phase Three Ap...	Is Active		
TEST 1	TEST Application	New					Details	History

2. A pop-up window will appear, indicating that Phase I is scored and completed, and that Phase II is open for submission.

Phase One Status

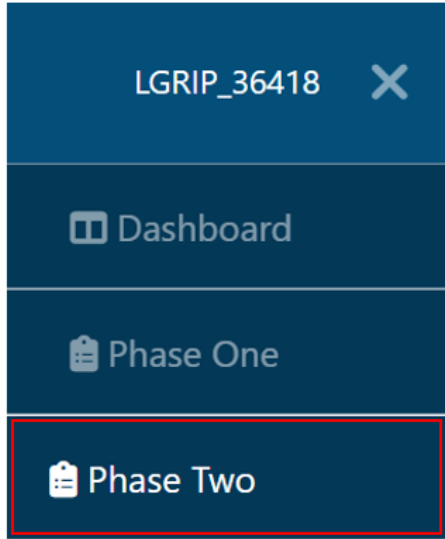
Complete
 Score: 5

Phase Two Status

Open for Submission
 Score: Score not Available

3. On the left sidebar of the pop-up window, click “Phase Two” to complete the application:

Expanded:



Collapsed:




- Once all required sections are complete and required documentation has been uploaded, save the application. When ready to submit the application, click “Submit for Review.”

Save Form

Submit for Review

- Once “Submit for Review” is checked, the application is submitted and cannot be altered. Once the application has been submitted, the Phase Two Status will change to “Submitted” on the project dashboard.

Phase One Status	Phase Two Status
 Complete Score: 5	 Submitted Score: Score not Available

Please note: If you submit your application without providing all information intended, please contact BCCGrants@baldwincountyal.gov.

- Baldwin County will review the application as submitted. After the application has been reviewed and scored, the point of contact will receive an automated email stating the proposed project’s score is ready to be viewed within the portal.

Identify the Project Location

Applicants must provide the exact location where project work will occur. Within the application narrative, the project location should be described with a standard street address. GPS coordinates must also be provided. Additionally, the project site must be identified on a “Project Location, Service Area, Beneficiaries Map” and uploaded as a PDF attachment. Applicants may upload additional documentation to support this section under the “Project Area Supporting Documentation” attachment type from the drop-down list.

Defining the Service Area

Determination of the area served by an activity is critical to understanding who will benefit from the project. A list of service areas and census tracts are provided in the application, of which the applicant should select all that apply. The service area must be shown on a “Project Location, Service Area, Beneficiaries Map” and uploaded to the Phase II application as a PDF attachment. Applicants may upload additional documentation to support this section under the “Project Area Supporting Documentation” attachment type from the drop-down list.

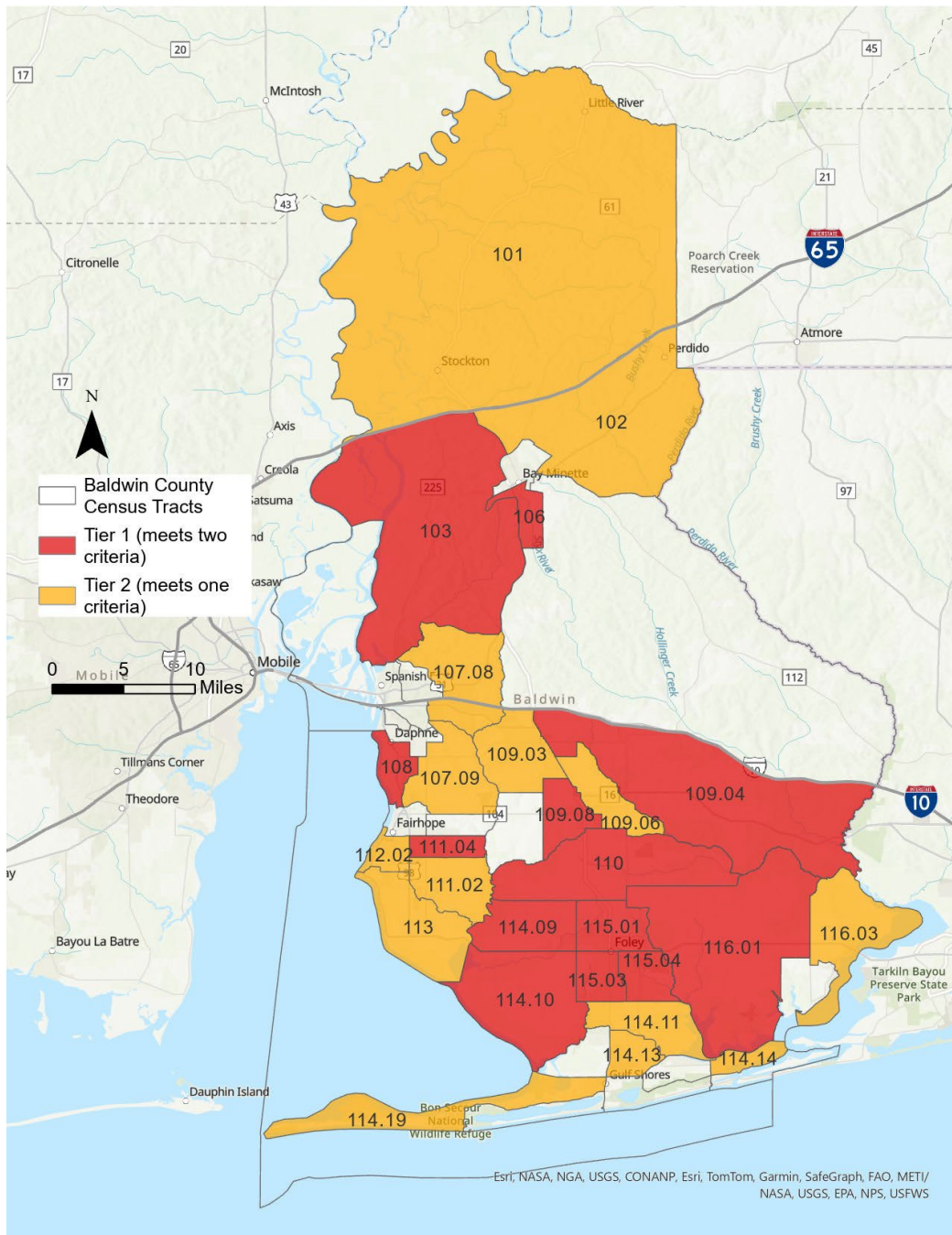
Once the service area is defined, it can be confirmed whether the percentage of low-to-moderate income (LMI) residents in the service area is high enough to qualify under the LMI benefit national objective by looking at the neighborhoods and census tracts within the project’s service boundaries. A reasonable service area should be selected based on the scope and outcomes of the project. The service area shall not be drawn to intentionally include LMI persons that would not benefit, nor shall it be drawn to intentionally exclude non-LMI persons that would benefit.

Service Area Priorities

The LRP specified MID Recovery Zones where program funds may benefit vulnerable populations and LMI households or individuals. Vulnerable populations are groups or communities “whose circumstances present barriers to obtaining or understanding information or accessing resources.” There is no standard set of vulnerable populations, and applicants can refer to the LRP *Section 2.3.5.2 Social Vulnerability* (page 44) for data on the Social Vulnerability Index and vulnerable populations in Baldwin County.

The Most Impacted and Distressed (MID) Recovery Zones map within the LRP shows the areas where vulnerable populations, low-income households, and highest recovery needs exist within the census tracts across Baldwin County. Census tracts are numbered on the map. The tracts shaded in red meet at least two criteria and are priority areas for CDBG-DR funding, as defined in LRP *Section 4.2 MID Recovery Zones* (page 90).

Map 1. Census Tracts within MID Recovery Areas, Baldwin County, 2024



Source: Baldwin County Local Recovery Plan, 2024

The census tracts within the tier one and tier two areas are also provided in the below table.

Table A. Census Tracts within MID Recovery Areas, Baldwin County, 2024

Tier 1 Census Tracts (meets two criteria)	Tier 2 Census Tracts (meets one criteria)
Census Tract 103	Census Tract 101
Census Tract 106	Census Tract 102
Census Tract 108	Census Tract 107.08
Census Tract 109.08	Census Tract 107.09
Census Tract 109.04	Census Tract 109.03
Census Tract 110	Census Tract 109.06
Census Tract 111.04	Census Tract 111.02
Census Tract 114.09	Census Tract 112.02
Census Tract 114.10	Census Tract 113
Census Tract 115.01	Census Tract 114.11
Census Tract 115.03	Census Tract 114.13
Census Tract 115.04	Census Tract 114.14
Census Tract 116.01	Census Tract 114.19
	Census Tract 116.03

Source: Baldwin County Local Recovery Plan, 2024

Census tract map and HUD resources are also available at <https://baldwincountyal.gov/departments/grants/cdbq-dr/recovery-programs>.

Low to moderate income households are those that meet the income threshold of 80% AMI based on the number of individuals (adults and children) within the household.

Table B. Income Limits, Baldwin County, 2025

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Extremely Low (30% AMI)	\$19,550	\$22,350	\$26,650	\$32,150	\$37,650	\$43,150	\$48,650	\$54,150
Very Low (50% AMI)	\$32,550	\$37,200	\$41,850	\$46,500	\$50,250	\$53,950	\$57,700	\$61,400
Low (80% AMI)	\$52,100	\$59,550	\$67,000	\$74,400	\$80,400	\$86,350	\$92,300	\$98,250
Median Family Income (FY 25)					\$93,000			

Source: HUD FY 2025 Income Limits Summary, * The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. LMI data is not collected for extremely low income.

National Objective

Each LRP/CDBG-DR funded activity must meet a national objective, as defined by HUD in section 104(b)(3) of the Housing and Community Development Act of 1974. Under the requirements of the CDBG-DR funding provided by ADECA and defined in the LRP, Baldwin

County LGRIP projects must provide a detailed written description of how the proposals meet one of the following national objectives:

- Benefit low- and moderate-income (LMI) persons;
- Meet other community development needs having an urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs (known as “Urgent Need”).

HUD requires that at least 70% of CDBG-DR funds be allocated and spent to benefit LMI populations. HUD requirements at [24 CFR 570.200\(a\)\(3\)](#) of the authorizing statute states the primary objective of the program when developing communities and expanding economic opportunities, should principally prioritize persons of low and moderate income. For the LGRIP application, the following national objective types are eligible. The national objective type should be selected based on the project’s scope, service area, and expected beneficiaries. To help determine the correct National Objective for the project, an **LMI Calculator tool** is available on the Baldwin County CDBG-DR LGRIP website.

1. LMI: The project activity benefits specific residents in a particular area, where at least 51 percent of those residents are low- and moderate-income persons.
2. LMI Area Benefit: The project activity benefits all the residents in a particular area, where at least 51 percent of the residents are low- and moderate-income persons.
 - An activity that serves an area that is not primarily residential in character shall not qualify under this criterion.
 - Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.
 - Other exceptions to area benefit determinations may apply as outline under the Federal Register allocation notices.
3. LMI Limited Clientele: The project activity benefits a specific group of residents in a particular area that are generally presumed by HUD to be LMI. (Refer to Appendix for Limited Clientele)
4. Urgent Need: Activities designed to meet community development needs having a particular urgency related to community health and safety.
 - As prescribed by the Federal Register allocation notices, the HUD Secretary has waived the urgent need national objective criteria in section 104(b)(3) of the HCDA and establishes alternative requirements for this national objective. Subrecipient activities which propose the urgent need national objective must provide a detailed written description of how the proposals meet all three criteria below:
 - Describe why specific needs have a particular urgency, including how the existing conditions pose a serious and immediate threat to the health or welfare of the community.

- Identify each proposed activity that must utilize the urgent need national objective because a low- and moderate-income national objective cannot be utilized.
- Document how each activity funded under the urgent need national objective responds to the urgency, type, scale, and location of the disaster-related impact as described within the Local Recovery Plan.

Project Context and Feasibility

This section provides an opportunity to expand on the project overview from Phase 1 and give as much detail as needed to demonstrate the project’s importance and feasibility with the use of CDBG-DR funds. To fully demonstrate the project’s eligibility for CDBG-DR funding, application responses for project scope should provide details that clearly describe:

- The existing conditions to be addressed by this project, such as impacts and unmet needs resulting from the storms (refer to the response provided to Tie Back in Phase I).
- The planned activities, such as demolition or clearance, construction, rehabilitation, service restoration, etc. All aspects of the project being funded by LGRIP should be included. Please also note completed actions or those being funded by other sources.
- The expected outcomes of the project. Outcomes should be measurable and achievable based on the scope of the project, with a focus on quantitative data. For example, *“Drainage structures will improve drainage during heavy rainfall events in the Sun, Glen, and Park neighborhoods by increasing the drainage rates from x to x cubic feet per second.”*

If the project includes acquisition of real property, provide a description and location of the type of land to be acquired, including:

- If CDBG-DR funds will be used for acquisition;
- If any individuals, households, or businesses may be displaced as a result of the project; and
- If any steps have been taken to advance acquisition at the time of application.

If the proposed project is a part of a larger plan or project that is in development, such as a regional or city-wide infrastructure plan or system update, this information should be included in the project scope.

Current Stage of the Project

The current stage of the proposed project can be defined as follows:

- *Planning:* The applicant is developing a plan for the proposed project
- *Design:* A plan for the project has been developed and the applicant is seeking the necessary evaluations and environmental reviews to move forward with the project
- *Review:* The project is currently under environmental review and is awaiting approval to begin the proposed project.
- *Construction-Ready:* The project has all required permits necessary to start construction; environmental reviews have been completed, reviewed, and approved, and the applicant can support the administration of construction projects.

Project Schedule

Applications must include a project schedule that includes major milestones, such as procurement of professional services, engineering and design, environmental review, acquisition, bid advertisement and construction with associated estimated start dates, duration, and end dates.

Projects must expend CDBG-DR funding and be completed by August 2028.

A project schedule must be attached and saved as “LGRIP Project Timeline.” The timeline or schedule document can be in the format of a list, a table, or a Gantt chart.

Project Budget

A brief description of the project budget estimated costs, and planned funding sources should be provided as a narrative. If this project is part of a larger plan or project, include this information in the budget narrative as well.

A budget must be included using the **LGRIP Project Application Budget template** (available on the Baldwin County CDBG-DR LGRIP website) and uploaded with the same name. The budget template must be completed to the fullest extent possible to provide an understanding of the project’s sources of funding and uses for CDBG-DR and other funds, as well as whether the project will be fully funded. Guidance and considerations for the budget template can be found in the Appendix.

Construction Cost Estimate

A detailed cost estimate for all project-related construction costs should be developed along with the Budget template to show the line items included in the project cost. The detailed cost estimate will help the County confirm costs are eligible for the grant and reasonable for the project. The cost estimate can be uploaded to the Portal along with the Budget template.

Capital Improvement Plan

A Capital Improvement Plan (CIP) outlines how resources will be allocated for major infrastructure, facility, or equipment projects. Although submitting a CIP is not required, Baldwin County may request a copy if the proposed project is identified as part of the plan. If the project is a funded item within the CIP, it should also be reflected in the budget worksheet.

Maximum/Minimum Funding Request

The minimum award for CDBG-DR funding is \$300,000. There is no maximum award limit, however the Baldwin County Commission will strive to ensure funds are distributed for overall best uses to meet priority recovery needs.

Cost Reasonableness

As part of compliance with HUD CDBG-DR requirements and cost principles described in the Uniform Administration Requirements under [2 CFR 200](#), the County will only approve projects that can reasonably support cost feasibility. Each project, whether implemented by the County or a project owner, will need to provide sufficient evidence that the project costs are reasonable, necessary, and allocable for the funding. Projects that cannot demonstrate that costs are

reasonable and necessary will not be considered for CDBG-DR funding. Further guidance on completing the budget template and cost principles is included in the Appendix.

The Baldwin County Commission reserves the right to award more or less than the amount of funds requested by an organization based on funding available, a duplication of benefit analysis, cost reasonableness analysis, and assessment of actual project need, and to allocate available funds among multiple organizations in a manner addressing overall best uses and recovery priorities.

Defining Beneficiaries

LGRIP project applications must identify the communities and populations that will benefit from project outcomes. Determination of the communities served by an activity and identifying the specific benefits to the community is critical to understanding how the project is addressing unmet recovery needs. This can be done by looking at the demographics of the Census tracts that the project will serve.

Where feasible, applications should include descriptions of any vulnerable populations expected to benefit from project activities. Vulnerable populations can be difficult to define, as they vary locally and regionally based on several factors, but these populations generally include minorities, elderly persons, or persons with disabilities, in addition to low-income households. Applicants should refer to *Section 2.2 Demographics* in the LRP (page 16) for an understanding of the demographics, and thus, the vulnerable populations within Baldwin County.

Addressing Unmet Needs and Impacts

The application should indicate the positive impact that the project will have in addressing an unmet recovery need and/or improve conditions for the beneficiaries. The contributions described should align with the project's goals and outcomes, as described in the Project Context & Feasibility section. Impacts or benefits should be based on the needs identified in the LRP (Section 2.4, page 48; Section 4.4, page 97), describing how the public and/or service area will be affected by the proposed project.

Critical Infrastructure

In addition to determining benefits to LMI and vulnerable populations, the applicant can indicate if the project will support services or infrastructure that HUD defines as critical actions. Critical infrastructure, or critical actions, are described as any activity for which even a slight chance of flooding would be too great, because such flooding might result in loss of life, injury to persons or damage to property ([24 CFR 55.2\(3\)\(i\)](#)). Critical actions include activities that create, maintain or extend the useful life of those structures or facilities that are likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during flood or storm events. This includes infrastructure such as hospitals, nursing homes, emergency shelters, police stations, fire stations, and principal utility lines.

If the project will benefit critical infrastructure or actions, the applicant should include those services and locations on the "Project Location, Service Area, Beneficiaries Map" as well as list the services and sites in the application narrative.

Sustainability and Resilience Measures

In accordance with the Federal Register Notices [87 FR 6364](#) and [87 FR 31636](#) ADECA's Action Plan and the County's LRP describe how recovery efforts will integrate hazard mitigation and resilience planning to create a more resilient and sustainable long-term recovery. This includes incorporating mitigation measures when implementing activities to construct, reconstruct, or rehabilitate both public structures and systems with CDBG-DR funds. Because of this, project owners are encouraged to include mitigation measures in their infrastructure activities to minimize damage in future disaster events. Incorporating mitigation measures into construction standards should result in the design and construction of structures to withstand existing and future climate impacts expected to occur over the service life of the project.

Mitigation measures are defined as actions taken to reduce or prevent hazards from recurring. Measures fall into the categories of prevention, property protection, structural mitigation, emergency services, and public awareness and education. All forms of mitigation measures included in the proposed project should be included in the applicant's description, as projects with mitigation measures are prioritized. Applicants should refer to *Section 2.7 Mitigation Needs Assessment* in the LRP (page 62) and *Section IV(j) of the Baldwin County Infrastructure Policy Manual* for mitigation goals and measures that may be incorporated into recovery-related construction projects.

Organizational Capacity

All applicants will be expected to demonstrate capacity to manage infrastructure improvement projects while complying with federal compliance standards.

Project Administration

To demonstrate capacity for the proposed project, the applicant must show the organization's ability to meet program requirements and experience with similar scopes of work. This includes identifying the project team structure and positions responsible for project oversight, managing staff and contractors, compliance, and reporting.

If the applicant has plans to bring on a consultant team to enable capacity and additional support, please include details under *Alignment and Coordination*.

Financial Administration

Governmental entities or public agencies receiving federal funds, such as the CDBG-DR funds for LGRIP, must demonstrate that they are able to meet and comply with 2 CFR Part 200, which establishes uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal Entities.

For this portion of the application, the applicant should indicate whether financial management systems are currently in alignment with [2 CFR 200.302](#) and [2 CFR 200 Subpart E](#). A "no" response is not an automatic disqualification for award. Baldwin County may request additional information as part of the application review to understand current financial management practices, accounting system functionality, and the ability of the organization to maintain compliance. Additional guidance on 2 CFR 200 financial requirements is provided in the Appendix under *Meeting 2 CFR 200 Requirements*.

Alignment and Coordination

Applicants may coordinate with a partner organization, other agency, or a consultant to meet the program’s requirements and experience necessary to complete the scope of work. It should be noted that the project owner is the responsible entity, who will hold the agreement with the county and carry out all eligible activities of the project.

If a partnership is being utilized, the applicant should demonstrate the need for the partnership to expand the organization’s capacity to improve project efficiency and impact on the service area. Applicants should describe the partner’s role in the project and how responsibilities will be met. A letter of intent from the partner or an agreement between the two entities must be uploaded with the application.

If a consultant has been, or will be, hired for additional support, the applicant should describe this intent and what role the consultant will have on behalf of the applicant.

To demonstrate alignment, the applicant must be able to correlate their proposed project with at least one of Baldwin County’s Strategic Priorities, determined by the County Commission and public input. The [Baldwin County Strategic Plan](#) Priorities for the application are as follows:

1. Growth & Infrastructure Balance: Focus on transportation and economic development infrastructure to keep pace with population growth.
2. Public Safety: Prioritize public safety to ensure a safe and thriving environment for all.
3. Economic Prosperity & Workforce: Build a vibrant, prosperous local economy and build a workforce to support the industries the County seeks to attract.
4. Protecting the Natural Environment: Reduce runoff and flooding and increase transparency and accountability for watershed quality.

Applicants should demonstrate how the project aligns with other local or regional initiatives or projects, where applicable. If industry best practices will be utilized, applicant should describe what those practices are and the benefits of utilization.

Phase II Application Checklist

2020 HURRICANES SALLY AND ZETA LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION REQUIREMENTS & DOCUMENTS CHECKLIST		
Section	Description	Required Information
Project Location & Service Area		
Project Address/Location	State the project’s location.	X
A. Project street address	Provide project street address for site specific projects.	X
B. Project location map	Provide a map that clearly indicates the location/extent of the project. Upload this map under file name Project Location, Service Area, Beneficiaries Map . This	X

2020 HURRICANES SALLY AND ZETA LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION REQUIREMENTS & DOCUMENTS CHECKLIST		
Section	Description	Required Information
	map may also include the service area and other attributes, as described below.	
C. Project GPS Coordinates	Include GPS Coordinates for linear projects or area projects if available.	X
Map of benefitting service area	Provide a map that clearly defines the entire primary benefiting area of the project. Upload this map under file name Project Location, Service Area, Beneficiaries Map . A reasonable service area should be selected based on the scope and outcomes of the project. The service area shall not be drawn to intentionally include LMI persons that would not benefit, nor shall it be drawn to intentionally exclude non-LMI persons that would benefit.	X
Define Service Area	Check all boxes that apply to the areas impacted by the project.	X
Census Tracts to be served	Using the map and list of Census Tracts, identify and provide the Census Tracts that will be covered in the Services Area of this project.	X
Additional maps or detail may be provided for the following as applicable to the project:		
<i>Aerial photo of project area</i>	<i>Include this information if available.</i>	
<i>Map of area and depth of ground disturbance</i>	<i>Include this information if available.</i>	
<i>Parcel map with property identification numbers</i>	<i>Include a survey of project area if available.</i>	
<i>Map indicating location of concentrations of LMI Persons</i>	<i>Include if applicable. See reference to Census Tracts below.</i>	
National Objective		
National Objective identified	Select the appropriate National Objective from the choices provided.	X
Description of Urgent Need	If the project is benefitting Urgent Need, define the urgency, time, scale, and location of the disaster-related impact. If the Urgent Need criteria is a lack of available funding, evidence of exhausted alternative funding options must be provided. Upload this documentation as	

2020 HURRICANES SALLY AND ZETA LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION REQUIREMENTS & DOCUMENTS CHECKLIST		
Section	Description	Required Information
	National Objective Supporting Documentation.	
Project Context & Feasibility		
Description of acquisition, if applicable	State whether the project will require acquisition of property, i.e., purchase of property, acquisition of servitudes, etc.	X
Current stage of the project	Select the appropriate stage of the proposed project from the dropdown menu. See Application Guidance for definitions of the stages.	X
A larger plan or project	State whether the proposed project is a part of a larger plan or project that is in development, such as a regional or city-wide infrastructure plan or system update. If the response is Yes, include this information in the project scope and upload the plan document as supporting documentation.	X
Project Schedule	Upload a project schedule as LGRIP Project Timeline that includes major milestones, such as procurement of professional services, engineering and design, environmental review, acquisition, bid advertisement and construction with associated estimated start dates, duration, and end dates.	X
Budget Detail Plan	Upload a completed budget template as LGRIP Project Application Budget.	X
Cost Estimate	Upload a construction cost estimate as Cost Estimate.	X
Beneficiaries		
Identify Intended Beneficiaries	Provide a description of the benefitting populations and communities the project aims to serve. Reference the location of beneficiaries on the Project Location, Service Area, Beneficiaries Map	X
Intended Impact	Provide a detailed description of the intended impact of the project and how it will address unmet recovery needs.	X
Critical Infrastructure	Identify any critical infrastructure benefitted.	

2020 HURRICANES SALLY AND ZETA LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION REQUIREMENTS & DOCUMENTS CHECKLIST		
Section	Description	Required Information
	Critical Infrastructure is defined as physical structures, facilities, networks, and other assets which provide services that are essential to the social and economic functioning of the County.	
Beneficiary Supporting Documentation	<i>If additional information is necessary to define the beneficiaries of the project, it should be uploaded as Beneficiary Supporting Documentation.</i>	
Critical INF Supporting Documentation	<i>If any additional information is necessary to define the critical infrastructure, it should be uploaded as Critical INF Supporting Documentation.</i>	
Sustainability & Resilience Measures		
Mitigation Measures Narrative	Include and identify any mitigation measures that will be included in the project activities. If applicable, provide a detailed description of how resilient building codes will be incorporated into the project. If there is a mitigation plan, it should be uploaded as Mitigation Plan .	
Maintenance Plan	If applicable, provide a detailed description of how the project will be operated and maintained, including the responsible entity, source of funding, etc.	
Mitigation Supporting Documentation	<i>If additional information is necessary to define mitigation measures and goals, it should be uploaded as Mitigation Supporting Documentation.</i>	
Organizational Capacity & Experience		
Project Administration Team	Provide descriptions of the roles and primary responsibilities of the project administration team.	X
Organizational Chart	Upload an organizational chart showing team structure and position titles for the project as Organization Chart . Note any positions that need to be filled.	X
Relevant Experience	Provide description of agency's experience managing similar projects in scope and size.	X
Alignment & Coordination		

2020 HURRICANES SALLY AND ZETA LOCAL GOVERNMENT RECOVERY INFRASTRUCTURE PROGRAM (LGRIP) APPLICATION REQUIREMENTS & DOCUMENTS CHECKLIST		
Section	Description	Required Information
Implementation Partners	Include description of partner or consultant roles, if applicable. Detail how partnerships will expand the project service area.	
Alignment with industry best practices and/or local initiatives	Include any supporting documentation with details on best practices or ties to local initiatives included in the project, if applicable. Upload as Coordination Supporting Documentation .	
Baldwin Strategic Plan	Select the Baldwin County Strategic Plan priorities that best align with the project.	X

Phase II Application Scoring

All applications will be evaluated to ensure the proposed projects are eligible for CDBG-DR funding. Submitted project proposals must be consistent with the requirements of Baldwin County’s Local Recovery Plan and the LGRIP. Application scoring will also be based on the submission meeting the requirements identified in the application and as described by these guidelines.

Responses provided to the questions in Phase II will be graded according to standardized scoring criteria laid out in the scoring rubric. The application scoring rubric is provided as a framework for understanding how each section and question will be reviewed. Projects will be considered based on the quality of the information submitted in the proposal based on completeness, relevance, conciseness, and organization of material presented. Each section of the application is weighted equally. The provided rubric outlines the considerations that will be evaluated in each section of the application, and the total number of points possible for each consideration. Once Phase II has been scored the point of contact will receive an email stating that “the most recent phase of your project proposal has been reviewed.” Applicants can view their scores on the Portal at this time.

County staff will be responsible for scoring projects. Once all projects are scored, staff will make recommendations to the County Commissioners. The Baldwin County Commission will consider project scores and feedback from the evaluation committee and select the projects to be submitted to ADECA in Phase III.

Application Scoring Rubric

Project Context & Feasibility	Points Possible
Project scope detail: objectives defined	1

Project scope detail: milestones provided	1
Project scope detail: Tasks described and assigned	1
Is the project scope detailed, and does it address activities identified in Phase 1?	1
Project schedule: construction timeline provided	1
Project schedule: project status provided, including permitting and acquisition needs where applicable	1
Budget detail: all funding sources, including requested CDBG-DR are listed	1
Budget detail: description of project budget is reasonable and complete	1
Supporting documentation is provided and adequately justifies project scope and budget.	2
TOTAL POINTS POSSIBLE	10

Beneficiaries	Points Possible
Intended beneficiaries: HUD- defined vulnerable populations and communities defined	2
Intended impact: Description of the community needs	3
Intended impact: Description of improved outcomes for most impacted populations and communities.	2
Intended impact: documentation verifying that the project serves a MID Recovery Zone.	2
Intended beneficiaries: documentation proving benefits to critical infrastructure	1
SECTION TOTAL	10

Sustainability and Resilience Measures	Points Possible
Project will be maintained for 5 years after completion (1 pt)	1
Operations and Maintenance Plan developed (1 pt)	1
Mitigation measures included in the project (1 pt)	1
Description of risks or hazards that impact the community (1 pt)	1
Description of how mitigation measures will reduce risks (1 pt)	1
SECTION TOTAL	5

Organization Capacity and Experience	Points Possible
---	------------------------

Description of project administration team roles and responsibilities. (2 pts)	2
Description of applicable project experience and capacity to administer project and oversee compliance requirements. (2 pts)	2
Description of federal, state and/or local government grant experience (2 pts)	2
Applicant answered "yes" for all key components required in their financial management system? (2 pts)	2
Supporting financial management documentation and organization chart (2 pts)	2
SECTION TOTAL	10

Alignment and Coordination	Points Possible
Description of alignment with local initiatives (1 pts)	1
Description of alignment with industry best practices (1 pts)	1
Indication of alignment with Baldwin County Strategic Plan priorities (2 pts)	2
Supporting coordination documentation and/or description of how partnerships expand service area (1 pt)	1
SECTION TOTAL	5

LGRIP Phase III

Projects selected by the Baldwin County Commission must be submitted to ADECA for final funding approval. Applicants will receive notification from the County of the project's selection intent to submit to ADECA. The projects selected by the Commission will be required to supply additional documentation prior to submission to ADECA. The type of documentation required for ADECA may differ from project to project. In its notification of project selection, the County will detail which of the below supporting documents are needed for ADECA's consideration.

ADECA will evaluate projects on several criteria including, but not limited to, project beneficiaries, readiness, cost-benefit, mitigative aspects, service area demographics, and leveraging of funding, among others. The goal of the evaluation is to ensure that implemented projects have high impacts and maximize the effects of the CDBG-DR funding¹.

Baldwin County will notify applicants of their pending subaward once ADECA approves CDBG-DR projects for funding.

Phase III Documents

UEI and STAARS VSS Acct#

Organizations for selected projects will need to be set up an account at Sam.gov and receive a Unique Entity Identifier to demonstrate the organization is eligible to receive federal funding:

<https://sam.gov/>

Organizations will also need to register with the State of Alabama STAARS Vendor Self Service to show eligibility for doing business with the state:

<https://procurement.staars.alabama.gov/PRDVSS1X1/AltSelfService>.

If accounts are already established, those current numbers can be used and new registration is not needed.

Final Cost Estimate

The package submission to ADECA defines the project's budget and CDBG-DR award amount. As part of this package, ADECA requires a completed cost estimate signed by an engineer or architect. If projects have not completed design in order to complete the cost estimate, Baldwin County may work with the applicant to prepare the required documentation in a timely manner.

Proof of Other Funding

Selected projects will need to provide documentation on any additional funding sources included in the budget, such as annual funding approval, loan documents, or copies of check or letters from insurance proceeds. This is to demonstrate that the funds being leveraged with CDBG-DR are available to the applicant and ready to implement.

Feasibility Study

A feasibility study plays a critical role in demonstrating that a proposed infrastructure recovery project is viable, necessary, and ready for investment using federal disaster recovery funds. Applicants are required to provide documentation that a project will address unmet needs from

¹ 2022 DRGR Public Action Plan. Available online at: <https://adeca.alabama.gov/wp-content/uploads/Alabama-DRGR-Public-Action-Plan-Approved-1.12.23.pdf>.

Hurricanes Sally or Zeta, is ready for implementation, especially if labeled "construction-ready" and has realistic costs and timelines. A feasibility study documents this readiness and compliance with federal requirements, including 2 CFR Part 200 cost reasonableness standards.

CDBG-DR regulations demand that project costs are necessary, reasonable, and allocable. A feasibility study can provide cost estimates or engineering assessment, independent cost analysis or market price comparisons and funding gap analysis for unmet needs. This helps avoid overestimation and duplication of benefits (DOB).

Technical Study

A relevant technical or economic study, or similar third-party analysis, strengthens the credibility and defensibility of a proposed project by offering an independent, expert evaluation of key project elements. These studies provide objective validation of the project's design, cost estimates, and expected outcomes, helping to confirm that the proposed solution is technically sound, economically reasonable, and aligned with best practices. In infrastructure projects, technical studies such as engineering assessments, hydrologic models, or environmental reports demonstrate the feasibility and effectiveness of the project scope. Economic studies, on the other hand, may show how the project will improve local economic conditions, reduce future disaster-related losses, or support long-term community sustainability. Third-party analyses are particularly important in the CDBG-DR context because they help establish compliance with federal requirements such as cost reasonableness under 2 CFR 200, and they can serve as supporting documentation for project eligibility, unmet need, and prioritization.

Operations and Maintenance Plan

An Operations and Maintenance (O&M) Plan outlines how the restored or constructed assets will be operated, maintained, and sustained over their useful life to ensure long-term functionality and resilience. The plan typically describes roles and responsibilities for operating the infrastructure, routine and preventive maintenance activities, inspection schedules, and procedures for repairs following normal wear or future disaster events. It also addresses funding sources, staffing and training needs, coordination with partner agencies, and protocols for monitoring performance and adapting operations to changing conditions. The O&M Plan demonstrates that the project will remain effective, safe, and reliable well beyond the recovery period.

Rate Schedule

A rate schedule outlines the structure and methodology used to set and collect user fees or service charges necessary to operate, maintain, and sustain the facility. It describes the types of rates applied (e.g., flat fees, usage-based charges, or tiered rates), how rates are calculated, and how they align with operating costs, maintenance needs, and long-term capital reserves. The rate schedule also identifies who is subject to the rates, the process for periodic review and adjustment, and how revenues will be managed to ensure the financial viability and equitable use of the project over time.

Other Plans or Studies

If the application includes other development efforts and plans that the project aligns with, the applicant will need to provide these documents as part of the submission to ADECA.

Monitoring or Audit Findings

If the applicant has any open concerns or documented findings related to program or project administration, fiscal administration, or grant administration, as a result of a federal or state agency monitoring review, or from the result of an annual single audit, these reports will need to be provided to Baldwin County.

LGRIP Application Guidance Appendix

Completing the Budget Template

Cost Principles

Projects using federal funds must comply with and meet the cost principles outlined in 2 CFR Part 200 Subpart E by demonstrating that costs are:

- **Necessary:** CDBG-DR funding will fill a necessary gap to address an unmet need that cannot be filled by another funding source. This is demonstrated by providing the sources and uses as part of the budget to show how costs for each activity are addressed.
- **Reasonable:** Costs should not exceed what a prudent person would incur under similar circumstances as demonstrated by the market price for comparable goods and services. The project budget should provide work costs based on best estimates and realistic margins. For contracted work, project owners will need to conduct an Independent Cost Estimate (ICE) to establish cost reasonableness prior to procuring work. Baldwin County may provide technical assistance to support completing an ICE for project engineering and/or construction costs.
- **Allowable:** Costs must be allowable under CDBG-DR rules and regulations under 2 CFR Part 200 Subpart E. Some costs, such as lobbying, entertainment, gifts, and alcohol, are never allowed under any circumstances.
- **Allocable:** Costs must be clearly allocated, meaning the cost is assigned to a CDBG eligible activity with a methodology for determining where to attribute cost.

Cost Types

Project Costs

Project costs are all expenditures directly related to project development and completion.

Activity Delivery Costs

Staff and overhead costs directly related to carrying out project activities are eligible under 24 CFR 570.201 and 570.204 as activity delivery costs (ADCs). All ADCs must be allocable to the approved activity and are limited to direct costs integral to the delivery of the final CDBG-DR assisted activity. The project ADC budget cannot exceed 5% of the project award.

Eligible Activity Delivery Direct Costs include, but are not limited to:

- Environmental Reviews (If completed by the project owner)
- Public notice publication costs and/or public notice recording fees
- Completing work write ups
- Developing and reviewing progress reports to submit to Baldwin County

Expected staff costs should be identified in the project budget based on the hourly rate for each position and the estimated amount of time that will be worked on the project. The costs incurred must be tied to delivering the CDBG-DR project and complying with terms of the agreement with Baldwin County.

The Baldwin County Commission will not reimburse any applicant for any costs associated with the preparation and submission of an LGRIP application.

Post-Award Project Requirements

If a project is awarded and will be implementing activities using CDBG-DR funding, HUD requirements must be adhered to from project set up in order to maintain compliance. To ensure successful implementation, **technical assistance and support will be provided** on the below topics and additional requirements as needed so that project owners are able to maintain compliance with funding. Further guidance on the following requirements can also be found at <https://baldwincountyal.gov/departments/grants/cdbq-dr/recovery-programs>.

Environmental Review

Before CDBG-DR program funds are expended, an environmental review must be completed. Environmental Reviews must be completed and approved before any choice limiting actions can be made, such as acquisition of property, entering into a contract, or demolition. Environmental Reviews will be conducted by the project owner and provided to Baldwin County for review prior to being submitted to ADECA. Baldwin County may support the project environmental review if assistance is needed. Further guidance on environmental reviews and requirements for CDBG-DR is available in ADECA's Environmental Review Guidance at <https://adeca.alabama.gov/cdbq/environmental/>.

Procurement/Contracting

Baldwin County and the LRP CDBG-DR funding is subject to the procurement regulations under [2 CFR part 200.318 – 200.327](#). Prior to entering a contract using CDBG-DR funding, the project owner must conduct a procurement process that allows for an open and fair competitive selection and an analysis of costs. The selection criteria must also demonstrate that a contractor has the capacity to perform within the program's performance period and milestones, be in good standing with the County and state, and is not debarred from receiving federal funds.

Duplication of Benefits (DOB)

Entities must also comply with duplication of benefit requirements. A duplication of benefit (DOB) may occur under LGRIP when a project receives funding from multiple sources for a cumulative amount that exceeds the total for the budget need. Under CDBG-DR, the amount of duplication is the amount of assistance provided in excess of the need. It is Baldwin County's responsibility to ensure that each CDBG-DR program or project provides assistance only to the extent that the project's funding needs have not been met by another source. The project owner will be responsible for ensuring Baldwin County is notified whenever additional funding becomes available for the project and less CDBG-DR funding is needed. Baldwin County will provide tools and technical assistance on project and financial management to ensure project owners comply with DOB requirements.

Labor Compliance

Construction projects funded with CDBG-DR must meet certain labor laws, known as Davis-Bacon and Related Acts (DBRA). DBRA applies to contractors and subcontractors performing work on federally funded or assisted contracts more than \$2,000 for the construction, alteration, or repair (including painting and decorating) of public buildings or public works. The Davis-Bacon Act requires payment of prevailing wages to workers, and additional regulatory labor requirements are designed to provide additional protections to workers. Payroll reports will be required from contractors weekly during construction.

Section 3

The Section 3 Program (24 CFR Part 75) is a means by which HUD fosters local economic development, neighborhood economic improvement, and individual self-sufficiency. Section 3 is the legal basis for providing job opportunities for low- and very low-income residents and awarding contracts to businesses in areas receiving certain types of HUD financial assistance. LGRIP projects will be required to report on efforts made to encourage Section 3-eligible individuals to participate in employment and training opportunities related to project construction.

Meeting 2 CFR 200 Requirements

The administration of Federal funds is directed within regulations under 2 CFR part 200. These regulatory codes define uniform administrative requirements, cost principles, and audit requirements for Federal awards to non-Federal entities. Recipients and project owners of federal awards must demonstrate their ability to meet these requirements in the following ways:

1. Have clearly written financial management policies and procedures that address:
 - Establishing and maintaining effective internal controls (2 CFR 200.302, 200.303);
 - Ensuring allowable costs incurred during the period of performance;
 - Cost reasonableness as detailed in 2 CFR §200.400 – §200.475 as applicable;
 - Source documentation requirements for costs invoiced; and
 - Processing payments and disbursement of funds
2. Accounting records regarding award, including:
 - Authorizations, obligations, unobligated balances, assets, liabilities, expenditures, and interest;
 - Reconciliation of accounts, revenue and expenditures; and
 - Adequate control over all funds, property, and other assets
3. Conduct annual audits of financial expenditures as necessary (2 CFR 200.302, 200.303)
4. Retain records of financial transactions related to the award (2 CFR 200.334-200.338)

Cost Reimbursement

All project agreements and contracts will be funded on a cost reimbursement basis. Project owners must be able to pay project costs prior to requesting reimbursement. Project owners will be required to submit proper back-up documentation for eligible project expenses which will be defined in their project agreement and approved budget.

Under no circumstances will Baldwin County advance funds for costs prior to those costs being determined to be eligible and incurred.

Documenting Staff Time (Activity Delivery Costs)

All personnel costs must be clearly documented and attributed to a CDBG-DR eligible activity. With respect to determining the amount of staff costs to charge to the administration of the project, the project owner must:

- Provide payroll documentation for the entire amount of salary/wages, benefits, and related costs of each person with time worked on project assignments; and
- Document hours worked by each staff person within the pay period on project assignments. Staff CDBG-DR costs must include a timecard, time sheet such as a

Personnel Activity Report (PAR) form, or other time keeping mechanism that demonstrates that the time was spent on the eligible CDBG-DR activity by daily tracking and notes or a summary of work completed.

- Determine the pro rata share of each person's salary, wages, and related costs for staff that work on the CDBG-DR project by an hourly equivalent or similar rate.
- If a consultant is hired for project management, the costs must be documented via invoices, receipts, and documents demonstrating deliverables and proof of payment.

Further guidance on invoicing, supporting documentation, and reimbursement will be provided as part of project agreements, project coordination, and technical assistance with Baldwin County.