

**COUNTY OF MERCER
CDBG-CV
GRANT MANAGEMENT PLAN**



**COUNTY OF MERCER
CDBG-CV
GRANT MANAGEMENT PLAN**

CONTENTS

PURPOSE 1

ADMINISTRATION 1

 Administrative Team: 1

 Administrative Tasks: 2

 Schedule..... 3

 Advertisements & Notifications: 4

POLICY AND PROCEDURES FOR CONSULTING SERVICES..... 5

MERCER COUNTY CDBG-CV RECORDKEEPING 7

 NJ DCA / Mercer County CDBG-CV Contract Records 7

 Fiscal Records..... 7

 General Program Records..... 9

 Environmental Review 9

 Civil Rights..... 10

 Fair Housing..... 10

 Minority & Women’s Business Enterprise 10

 Equal Employment..... 10

 Equal Opportunity..... 10

 Labor Standards 11

 Citizen Participation 11

 Uniform Relocation Assistance And Real Property Acquisition..... 12

 Acquisition 12

 Relocation 12

 Close-Out Records..... 13

CONFLICT OF INTEREST POLICY 14

GRANT MANAGEMENT PLAN STANDARDS & PROCEDURES

PURPOSE

These standards and Procedures are to provide guidance and consistent approach through which the Community Development Block Grant – Coronavirus recovery projects are implemented by Mercer County. They are not, nor are they intended to be, all inclusive of every activity within the Housing and Community Development Office. These Guidelines will apply to the Community Development Grant projects and are in addition to existing County policies.

ADMINISTRATION

Administrative Team:

- Project Director: Anthony Carabelli, Jr., Director of Economic Development
acarabellijr@mercercounty.org / 609.989.6555
640 S. Broad St. / PO Box 8068 / Trenton, NJ 08650-0068
- Project Coordinator: Mary Sheehy, GrantWorks Inc.
mary.sheehy@grantworks.net / 201.961.5513
The Project Coordinator is a consultant hired by the Grantee for this purpose.
- Chief Financial Officer: ~~Sharon Sharp~~ [Nicola Trasente, Ed.D., Acting Chief Finance Officer](mailto:Nicola.Trasente@mercercounty.org) |
ntrasentessharp@mercercounty.org / 609.989.6694 |
640 S. Broad St. / PO Box 8068 / Trenton, NJ 08650-0068
- Fair Housing Officer: Edward Pattik, Director of Mercer County Housing & Community Development Office.
epattik@mercercounty.org / 609.989.6858
640 S. Broad St. / PO Box 8068 / Trenton, NJ 08650-0068
- Procurement Officer: Isamar Maldonado, QPA, RPPS, Purchasing Agent
imaldonado@mercercounty.org / 609.989.6710
640 S. Broad St. / PO Box 8068 / Trenton, NJ 08650-0068
- Legal Counsel: Paul R. Adezio, Esq.
padezio@mercercounty.org / 609.989.6511
640 S. Broad St. / PO Box 8068 / Trenton, NJ 08650-0068
- Project Staff as Needed: Terry West and Darren Stewart

Field Code Changed

Administrative Tasks:

- a. CDBG-CV Consultant solicitation and award was issued and executed per Mercer County procurement policies. Prior to the development of this Grant Management Plan.
- b. Scope Development will be determined collaboratively by Project Director, Project Coordinator and other staff as needed. GrantWorks will provide a supporting write-up for the selected scope – for review and concurrence by the NJ DCA funding liaison.
- c. Quarterly Reporting, MBE and Section 3 reporting will be completed by GrantWorks and approved/monitored by Project Director
- d. Development of Fair Housing Officer designation documents will be drafted by GrantWorks and issued, mailed and adopted by Mercer County through actions taken by Fair Housing Officer with assistance from the office of Economic Development and Project Staff.
- e. Grant Management Plan will be drafted by GrantWorks and reviewed, edited and accepted by Project Director and Fair Housing Officer. Per guidance from NJ DCA funding liaison, a Resolution to adopt the plan is not required.
- f. Citizen Participation Plan will be drafted by GrantWorks and reviewed, edited and accepted by Project Director, Fair Housing Officer and Project Staff. Project Director will ensure public notifications are issued; arrange virtual venue for public comment and ensure the related resolutions are brought before the Mercer County Board.
- g. Fair Housing Proclamations, Policies and Resolutions will be drafted by GrantWorks and approved by Fair Housing Officer, Project Director, and Project Staff. Fair Housing Officer will ensure documents and resolutions are brought before the Mercer County Board. Fair Housing Officer is responsible for compliance going forward.
- h. Memorandums of Understanding between Mercer County and the municipalities benefiting from the CDBG-CV funded projects will be drafted by GrantWorks and reviewed and approved by Project Director and Legal Counsel. Execution of agreements will be completed by Mercer County – per usual procedures.
- i. Solicitations will be drafted by GrantWorks and reviewed and approved by Project Director and Procurement Officer. Scope Details will be developed in a collaborative fashion between Mercer Staff, GrantWorks and applicable Municipal Representatives. Solicitations will be issued and related documents collected by Procurement Officer.
- j. Solicitation Responses will be reviewed for completeness and compliance by GrantWorks and Procurement Officer. Responses will be reviewed and selected by Project Director, Fair Housing Officer and Project Staff.

- k. Selected Vendor/Contractors contracts will be executed per typical Mercer County procedures and implemented by Procurement Officer.
- l. Funding Accounts for awarded contracts will be set up, monitored and used by Chief Financial Officer and Procurement Officer. Copies of invoices paid will be provided to GrantWorks for tracking and for inclusion in a complete close-out file.
- m. Grant Program Management will be completed by GrantWorks – this includes developing application documents, agreements and acknowledgements by small businesses or non-profits, reviewing applications, providing preliminary eligibility recommendations and issuing award letters. Concurrence on eligibility determinations will be provided by Mercer County – who will also be issuing the checks to awarded small businesses.
- n. Equipment Purchases will be overseen by Project Director and Project Staff. Solicitation documents will be reviewed for CDBG-CV compliance by GrantWorks. They will coordinate with appropriate Mercer County staff and Municipal representatives to track delivery of the specified product and provide sign-off on hand-off to Municipal representatives, as applicable.
- o. Closeout Documentation will be collected, stored and provided to NJ DCA by GrantWorks.

Schedule.

Task	Started	Completed
CDBG-CV Consultant	January 2023	August 2023
Scope Development	September 2023	December 2023
Fair Housing Officer Designation	November 2023	January 2024
Grant Management Plan	November 2023	February 2024
Citizen Participation Plan	November 2023	February 2024
Fair Housing Resolutions	November 2023	February 2024
Municipal Memorandums	February 2024	March 2024
Grant Program Development (CDBG-CV1)	February 2024	April 2024
Grant Program Launch & Implementation (CDBG-CV1)	April 2024	September 2024
Solicitation Development (CDBG-CV2)	March 2024	April 2024
Solicitation Review & Vendor Selection (CDBG-CV2)	April 2024	May 2024
Equipment Purchases & Delivery (CDBG-CV2 award)	May 2024	November 2024
Closeout Documentation	November 2024	December 2024

Advertisements & Notifications:

Any advertising, solicitations, documents or publications will include an acknowledgment of the following:

Financial assistance for this project is made possible by a grant from the:

*New Jersey Department of Community Affairs
Division of Housing and Community Resources
Community Development Block Grant CARES Act (CDBG-CV)*

*Philip D. Murphy, Governor
State of New Jersey*

*Jacquelyn A. Suarez, Acting Commissioner
New Jersey Department of Community Affairs*

POLICY AND PROCEDURES FOR CONSULTING SERVICES

1. Grantees that hire consultants with program funds must submit draft consultant agreements to the Department for approval. No funds will be released for such costs until the Department has approved the respective consultant agreement.

Solicitation Resolution was completed by the County Board on December 20, 2022.

Consultant was selected on August 17, 2023.

Executed contract with GrantWorks, Inc was completed on August 17, 2023.

Executed contract with GrantWorks, Inc sent to NJ DCA on September 21, 2023.

2. Consultant fees must be based upon specific work products not on a fixed time basis. A fixed monthly consultant fee regardless of work actually performed is prohibited.

Per a Memorandum, GrantWorks and Mercer County agreed upon a milestone-based payment plan. The Memorandum has been sent to NJ DCA for their records and total amounts listed below. For tracking of CDBG-CV funds and request for funds with NJ DCA – the total contract price and each shared milestone payment will be prorated across the awarded CDBG-CV1 and CDBG-CV2 funds based on the ratio between the two awards.

Milestones	CDBG-CV1	CDBG-CV2	Invoice
Intro Docs (Fair Housing, Grant Mgmt. Plan, Citizen Participation Plan)	\$7,709.48	\$12,290.52	\$20,000.00
Launch Grant Program (CDBG-CV 1)	\$12,000.00		\$12,000.00
Complete Grant Program (CDBG-CV1)	\$12,000.00		\$12,000.00
MOUs with Muni (CDBG-CV2)		\$15,000.00	\$15,000.00
Solicitation for Vehicles (CDBG-CV2)		\$12,000.00	\$12,000.00
Closeout Docs	\$2,910.33	\$4,639.67	\$7,550.00
Total	\$34,619.81	\$43,930.19	\$78,550.00

3. The Department (NJ DCA) will process payment requests for consultant services only when accompanied by a specific work product that has been accepted by the grantee or for a specific service performed that the grantee certifies as acceptable.
4. The Program Director has been designated to work with and oversee the consultant for the purpose of assuring that work products and services are acceptable.
5. Grantees must take and document affirmative actions to involve minority and female-owned businesses in the implementation of the project. Local consulting services must also be solicited for consulting contracts.

Mercer County has provided the solicitation documentation to NJ DCA for the CDBG-CV Consultant – including the M/WBE's solicited. For each solicitation issued for the CDBG-CV projects, a list of M/WBE's will be included and directly solicited – as per Mercer County's MWBE inclusion policy. Efforts will also be made to advertise in locations that will be seen by local businesses and qualified Section 3 businesses, as available and applicable.

6. Selection of a Consultant

Mercer County is not a CDBG entitlement entity, and thus did not have knowledgeable or extra, available staff for the implementation of CDBG-CV funded projects. Thus, it was determined to hire a consultant to address most of the grant-related activities. In January 2023, a fair and open solicitation was issued – with responses due January 27, 2023. There was some hesitation in approving the contract due to the completion due date of the program and then-current vehicle and equipment delivery delays. Then, in April 2023 – a time extension was provided to the program; resulting in Mercer County completing a final awarding resolution and contract execution on August 17, 2023.

The following documents are available and can be provided to NJ DCA:

- a) Initial RFP Issued
- b) Notices issued for RFP
- c) List from NJ SAVI to whom the RFP was issued
- d) Question & Answers to RFP received
- e) Addendum(s)
- f) List and review of Respondents
- g) Review checklists and Conflict of Interest Statements by Reviewers
- h) Contractor Selection
- i) Resolution to Award
- j) Executed Contract
- k) Memo on Billing Schedule

MERCER COUNTY CDBG-CV RECORDKEEPING

Mercer County is maintaining the following documents for four years after program closeout – available for review upon request.

NJ DCA / Mercer County CDBG-CV Contract Records

- A. Grantee application to which one can refer
 - a. Mercer CDBG-CV1 Application – Hightstown
 - b. Mercer CDBG-CV2 Application - Vehicles
- B. Copy of executed grant agreement
 - a. NJ DCA Grant Award Letters
 - b. Signed Resolutions
- C. Copies of executed amendments
 - a. Amendment to scope for CDBG-CV1 - Hightstown
- D. General correspondence
 - a. Emails will be maintained
- E. Log of visitors
 - a. N/A

Fiscal Records

- A. Books of Original Entry
 - 1. Charts of Accounts
 - 2. Payment Voucher - Register
 - 3. Cash Receipts Journal
 - 4. Cash Disbursements Journal
 - 5. Payroll Journal
 - 6. General Journal -
(all other entries not affecting cash, e.g. depreciation, sale of fixed assets, etc.)
 - 7. General Ledger
 - 8. Year-To-Date Balances
- B. Internal Review Questionnaire and Documentation Guide – *Mercer County has reviewed and will use the guide.*
- C. Monthly Fiscal Monitoring Report – Mercer County will be able to adequately answer the following questions – as provided in the Monitoring Financial Review Form:
 - 1. Are Federal funds deposited in a separate, non-interest bearing account?
OR
Are Federal funds accounted for through grant-loan fund control accounts?

Mercer County has set up six separate accounts as follows:

- *CDBG-CV1 staff salary account (\$0) – set to \$0 as no staff will be paid from these funds*
- *CDBG-CV1 contractor (\$34,619.81) – GrantWorks contract*
- *CDBG-CV1 grant awards (\$415,380.19)*
- *CDBG-CV2 staff salary (\$0)*
- *CDBG-CV2 contractor (\$43,930.19)*
- *CDBG-CV2 vehicle purchase (\$1,123,460.81)*

2. Do the procedures, charts of accounts, etc., provide for identifying receipts and expenditures of program funds separately for each grant?

For each of the accounts listed above, Mercer County is electronically tracking all invoices and checks issued separately. A report can be pulled as needed.

3. Does the accounting system provide for accumulating and recording expenditures by grant and cost category shown in the approved budget?

Yes, Mercer County is tracking as listed above.

4. Are all disbursements properly supported by evidence of receipt and approval of the related goods and services?

The Program Director will approve each payment before it is issued based on photographs demonstrating vehicle delivery and receipt; and/or upon completion of eligibility documentation for each applicant to the small business, microenterprise and non-profit grant program.

5. Do the supporting documents, such as invoices, purchase orders and receiving reports accompany checks for the check signers' review?

The Program Director will approve each payment before it is issued based on photographs and signed receipts demonstrating vehicle delivery; and/or upon completion of eligibility documentation for each applicant to the small business, microenterprise and non-profit grant program.

6. Are payroll charges reviewed against program budgets and are deviations reported to management for follow-up action?

There will be no payroll charges. Mercer County staff will not be paid from CDBG-CV funds. Those accounts have been set to \$0 in the system.

7. Are executive authorizations and approvals required for originating expenditures for capitol items?

The RFP(s) for the vehicle purchases will be authorized via resolution by the County Board.

8. Are at least two signatures required on all checks or on checks over a certain amount?

Yes, Mercer County follows a two-signature process.

- D. Copy of New Jersey State Payment Voucher
- E. Copy of audit of Small Cities Program and responses to any findings indicated
- F. Vendor Contracts
 - 1. *GrantWorks, Inc – grant management consultant*
 - 2. *Vehicle procurement documents under CDBG-CV2 project*
- G. Vouchers, Invoices, etc.
(alphabetically and chronologically or numerically by document #)
- H. Time Sheets for all Small Cities Personnel
 - 1. *No Mercer County Personnel salaries will be paid for with CDBG-CV funds. All funds will be spent on program deliverables and consultant hired (GrantWorks).*
- I. Inventory of personal property, indicating serial number and location
 - 1. *CDBG-CV1 project does not include the procurement of any equipment, properties, etc.*
 - 2. *CDBG-CV2 project includes the procurement of Vehicles for use by various towns within Mercer County. The equipment - these vehicles - will be maintained and tracked in compliance with 2 CFR 200.313(d) Management requirements.*

General Program Records

- A. Copy of all Program Progress Reports
- B. Chronological file for memos of meetings, changes, etc.
- C. Copy of staff field inspection and progress reports
- D. Grant Management Plan

Environmental Review

- A. For every project, the recipient must maintain an Environmental Review Record (ERR) that includes the following:
 - a description of the project and all project activities;
 - an evaluation of the project and all activities on the human environment;
 - documentation of compliance with applicable statutes and authorities (24CFR 58.5 and 24CFR 58.6);
 - written determinations and findings (e.g., exempt and categorically excluded project determinations, findings of no significant impact);
 - documentation to support findings; and
 - public notices and proof of publications, as required.

- B. Departmental correspondence concerning the ERR including the Request For Release of Funds and Certification and Notice of Approval For Release of Funds and Environmental Certification.
- C. Correspondence from objectors and municipal replies to objections and other public requests for environmental review information.

Civil Rights

The following items should be kept in the Grantee's Civil Rights File:

Fair Housing

- A. A copy of the Fair Housing Resolution adopted by the Grantee's ruling body.
- B. Copies of internet requests or letters to the N.J. Department of Law and Public Safety and the U.S. Department of Housing and Urban Development requesting fair housing information and copies of fair housing materials received.
- C. A Copy of the Public Notice announcing the Fair Housing Program.
- D. Supporting documentation of actions taken regarding fair housing. Such documentation may include records on funds provided, if any, for such actions; list of places where notices were posted; list of places where fair housing literature was distributed; written discrimination complaint procedures; minutes of fair housing meetings.

Minority & Women's Business Enterprise

- F. Documentation of efforts to inform and contract with minority & women-owned businesses (e.g., advertisements, list of minority and women's business enterprises contacted).

Equal Employment

- G. Employment data indicating the racial/ethnic characteristics and sex of the Grantee's employees responsible for carrying out an activity funded in whole or in part with CDBG funds. The data may be reported on the FR-2 form provided or on the Equal Opportunity Commission's EEO-4 form. The data should be compiled at the beginning of the grant period and updated during the term of the agreement as necessary.
- H. If the Grantee hires staff to implement the CDBG program, written personnel policies, advertisements, and other documentation consistent with equal opportunity employment law and regulations must be on file.

Equal Opportunity

- I. FOR DIRECT BENEFIT ACTIVITIES (Such as the CDBG-CV1 Hightstown Grant Program) - Data documenting the extent to which persons participated in or benefited from any program or activity funded in whole or in part with CDBG funds. Records must be kept by race, ethnicity, handicapped status and gender of heads of household (Use the FR-1 form provided).

- J. FOR AREAWIDE ACTIVITIES (Such as the CDBG-CV2 Vehicles Project) - Data on the characteristics of those benefiting from CDBG funded activities (From application).
- K. Data indicating the race and ethnicity of households, and handicapped status of persons displaced as a result of CDBG activities, including the address to which each displaced household relocated. Where activities cause a significant level of displacement of businesses, data indicating the impact on businesses owned by women and minorities must also be provided.
- L. Documentation of actions taken to overcome the effects of prior discrimination as determined through a formal compliance review or court proceedings (if applicable).

Labor Standards

Mercer County is not implementing any construction-related activities with CDBG-CV funds.

- A. Contract documents which contain actual wage rates used and which were included in the solicitation and award documents.
- B. Contracts containing proper and applicable labor standards provisions. File may also contain certification from contractor.
- C. Evidence that the recipient inquired and was informed that the successful bidder and all subcontractors were not on list of debarred contractors.
- D. Actual payrolls submitted & evidence that payrolls were reviewed by Grantee.
- E. Evidence that worker interviews were conducted.

Citizen Participation

- A. Evidence that the recipient has held a performance hearing at the point the project is approximately 50% complete including:
 - a copy of the display advertisement and proof of publication announcing the hearing;
 - a copy of the performance hearing minutes;
 - a copy of the performance hearing attendance sheet; and
 - correspondence from citizens in response to the advertised hearing and responses from the recipient.
- B. A copy of the resolution adopting the County and/or State Citizen Participation Plan as approved by the governing body of the recipient.
- C. Record of citizen complaints received, written replies issued by the recipient and records concerning the disposition of complaints.

Uniform Relocation Assistance And Real Property Acquisition

Mercer County's CDBG-CV programs do not include any property acquisition or potential relocation.

The following information shall be maintained for at least three years after each owner of the property and each person displaced from the property have received the final payment to which they are entitled.

Acquisition

- A. Identification of property and property owner(s). Evidence owner was informed on a timely basis about acquisition and his/her rights.
- B. Copy of each appraisal report, including review appraisal report, if applicable, and evidence that owner was invited to accompany each appraiser on appraiser's inspection of the property.
- C. Copy of written purchase offer and summary statement of the basis for the determination of just compensation; date of delivery to owner.
- D. Copy of purchase contract and documents conveying property.
- E. Copy of settlement statement and evidence that the owner received purchase price.
- F. Copy of any appeal or complaint filed and response.

Relocation

- A. Identification of person, displacement property, racial/ethnic group classification, age, sex of all members of household, monthly gross income of all members of household older than 17, monthly rent and average utility costs; type of enterprise, relocation needs and preferences.
- B. Evidence person received timely written notice informing person of eligibility for relocation assistance and related information.
- C. Evidence and dates of personal contracts; a description of services provided.
- D. Identification of referrals to replacement properties, dates of referral, sale or rental price, date of availability, reason(s) for declining referral.
- E. Identification of replacement property, monthly rent and utility costs, date of relocation.
- F. Replacement dwelling inspection report; date of inspection.
- G. Copy of approved claim form(s) and related documentation; evidence that person received payment.
- H. Copy of appeal or complaint filed and response.

Close-Out Records

- A. Final Program Progress & Fiscal Monitoring Report
- B. Final Monitoring Letter
- C. Final Performance Report

CONFLICT OF INTEREST POLICY

In compliance with the New Jersey Local Government Ethics Law N.J.S.A 40A:9-22.1 et seq., selection of awarded RFP respondents for CDBG-CV funded projects will be completed by Mercer County employees and officials with no relationship to solicitation respondents as disclosed per current procedures. Any possible relationship will be adequately disclosed via the Mercer County Committee Conflict Statement.

Should a conflict of interest (or perceived/potential conflict of interest) be identified, Federal regulations (24 CFR, 570, 570.611) require grantees to request a waiver from the NJ DCA CDBG-CV liaison based on an actual, potential or appearance of a conflict of interest in the provision of grant related assistance (e.g., housing rehabilitation grants and loans) or in the procurement of supplies, equipment, or construction contracts.

Conflict of interest regulations apply to any person who is an employee, agent, consultant, officer, or elected official of the grantee. Any persons who exercise any functions or responsibilities with respect to CDBG-CV related activities or have an interest in any CDBG-CV contract, subcontract or agreement, either for themselves or for family members or business associates, are covered by this provision.

The NJ DCA CDBG-CV liaison(s) may grant a conflict-of-interest waiver to the Grantee on a case by case basis. Grantees may request a waiver by submitting the following:

- A disclosure of the nature of the conflict, including evidence that there has been public disclosure of the conflict (e.g., minutes of a public hearing of the grantee's governing body); and
- A written opinion from the grantee's attorney that the interest for which an exemption is sought would not violate State or local law;

Factors that the Department will consider in granting a waiver include:

- Whether the exception would provide a significant cost benefit to the grantee or an essential degree of expertise would not otherwise be available;
- Whether an opportunity was provided for open competitive bidding or negotiation;
- Whether the person affected is otherwise a potential program beneficiary and the exception will result in the person receiving the same assistance as that offered to other program beneficiaries;
- Whether the affected person has withdrawn from his or her decision-making role in respect to the specific program activity;
- Whether the interest or benefit was present before the affected person was in the conflict of interest situation;
- Whether undue hardship will result to the grantee or the affected person; and/or
- any other relevant considerations.

