

Request for Reimbursements

Community Development Block Grant Program

July 2025



CDBG Requests for Reimbursements

CDBG grantees can access awarded funds to reimburse themselves for eligible project expenses by submitting a complete request for reimbursement packet to the assigned project specialist. The request for reimbursement packet is also commonly referred to as a draw packet, referring to the funds drawn from the awarded amount with each request processed.

Prior to submitting first CDBG Request for Reimbursement

A grantee must have an executed CDBG contract with Commerce before submitting its first CDBG draw request. The grantee must also submit two forms included in this toolkit to establish the formal mechanisms necessary for Commerce to approve the disbursement of CDBG funds:

- Signature certification form: designates at least two persons authorized to sign the grantee's request for reimbursement form. This person should be an employee, elected official or board member for the grantee; and
- 2. Electronic Funds Transfer Form 204: designates the specific bank account into which the grantee would like CDBG funds deposited. Federal regulations prohibit local governments from earning interest on CDBG funds deposited into the local government's account for the grant. Typically, this is not an issue for most grantees because CDBG funds are requested to reimburse themselves for invoices that have already been paid for by the grantee. If the grant recipient is paying invoices with the grant funds directly deposited and not reimbursing themselves, the funds must be deposited into a non-interest-bearing account.

The following special contract conditions outlined in the getting started chapter and in the getting started toolkit must be completed before the grantee may obligate or use CDBG funds for any project activities:



1. Environmental review

- For construction projects, the grantee must complete an environmental review record and have received a notice of release of funds from Commerce; however, upon receiving written authorization from Commerce, the grantee may incur administrative costs necessary for the preparation of the environmental review record defined as exempt under 24 CFR Part 58.
- National Environmental Protection Act process must be completed before the grantee can engage in choice-limiting actions such as going out to bid for construction or executing land use agreements.
- For CDBG Economic Development projects not involving construction, the grantee must complete an ERR in accordance with 24 CFR part 58 and submit a copy to Commerce.
- Please refer to chapter two of the CDBG manual and the environmental review toolkit for specific guidance.

2. Civil rights

- The grantee must have completed the following civil rights activities and submit documentation to the CDBG specialist assigned to the project.
 - Equal employment opportunity policy and poster
 - Fair housing resolution and poster
 - Hatch Act resolution
 - Section 504 and ADA-complaint procedures
 - ADA self-evaluation inventory and transition plan
- If the grantee has received a CDBG construction grant in the past, it is possible
 we can use the civil rights documents submitted with the previous project file.
 Please submit updated and/or recently approved civil rights documents, as
 applicable.
- Please refer to chapter one of the CDBG manual and the getting started toolkit for specific guidance.
- Insurance certificates



- Grantees must submit copies of its certificates of insurance demonstrating
 Commerce as an additional insured for each policy period covering the duration of the CDBG contract. Please submit certificates for the following types of coverage to the project specialist:
 - Workers' compensation
 - General liability
 - Professional liability
 - Property (construction projects only)

4. Procurement documentation

- Complete procurement documentation must be on file, to date, demonstrating compliance with CDBG requirements for all services currently under contract regardless of whether CDBG is paying for that service.
- 5. Executed interlocal or sub-recipient agreement, if applicable
 - This agreement can be executed once a contract between the grantee and Commerce is executed.
 - Please refer to our general agreement sample and housing agreement sample,
 CDBG Housing projects.

Components of a Complete Request for Reimbursement Packet

The following documents and forms included in this toolkit must be submitted with each CDBG request for reimbursement:

1. Request for reimbursement form

Grantees initiate a request for CDBG funds by preparing and submitting the request for reimbursement form.

- List the CDBG contract number.
- Include the draw number specific to the number of CDBG requests received.
- Provide grantee name and address.



- Provide the bank name and address, and only the last four digits of the grantee's bank account number. Please ensure that the account number aligns with the depository form on file.
- Verify amounts with award amounts in the contract, previously expended, current amount requested, to ensure all balances and calculations are accurate.
- Leave the remarks box empty.
- Grantee signatures: Commerce requires two signatures from the local government on the RFF, and they must match the signatures provided on the signature certification form.
- Two percent retainage: The grantee may not request the final 2% of the total authorized grant amount until:
 - The project has been issued certificate of substantial completion; and
 - The final completion report has been submitted by grantee and approved by Commerce.

2. Uniform status of funds tracking spreadsheet

The uniform status of funds spreadsheet provides Commerce with an updated project budget with each draw request and reflects the expenditure of each funding source, per line-item, throughout the life of the project.

- Budget modifications
 - Modifications to the budget of less than \$5,000 to any single line item can be submitted as part of the grantee's request for reimbursement request and Commerce approval of the request for reimbursement will constitute approval of the modification.
 - Budget modifications of \$5,000 or more to any single line item of the budget, or when the sum of budget modifications to any single line item over time exceeds \$5,000, the grantee must email a budget modification request to their project specialist including the specific amounts and line items involved and an explanation for why the modification is needed. The grantee must receive written approval from Commerce before making the



- modification or submitting a draw reflecting implementation. Commerce has 45 days to review and approve a budget modification request.
- All budget modifications made throughout the life of the project must be listed chronologically in a budget modification log below the budget table on the uniform status of funds spreadsheet. The budget modification log must be kept up to date as each change is made. Each log entry must include the date of the change, amounts moved to and from each line item and name the line items involved.
- If the construction contract amount is lower than the amount budgeted for construction, the amount budgeted in the project budget for construction may be reduced proportionally for all the funding sources with funds allocated to construction, and the savings can be moved into contingency for each source.
- Contingency amounts are reserved for use of construction activities and will seldom be approved for transfer to other line items. Please work closely with the project specialist if your project may require a transfer of contingency funds. The CDBG grant recipient may request to use the difference between the final actual project costs and the original grant award to fund additional work that further enhances the system. The grantee must submit a written request to use remaining CDBG funds for the additional work activities, including full rationale and cost details, for Commerce review and approval. The decision to allow additional work activities to be funded with remaining CDBG funds is strictly at the discretion of Commerce.

3. Uniform invoice tracking spreadsheet

 The uniform invoice tracking spreadsheet provides Commerce with a comprehensive list of all project invoices that have been generated by the project, with information detailing the funding sources used to pay for each



invoice. The invoice tracking spreadsheet is a cumulative list that must include all project invoices by project completion.

Helpful reminders:

- Warrant numbers: CDBG funds are dispersed on a reimbursement basis.
 Please complete the warrant numbers and dates paid columns E and F, for each invoice listed.
- Draw numbers: Please include draw numbers in the "#" columns next to each funding source column for the invoice associated with the request. The draw numbering is unique for each funding source and should demonstrate the invoices associated with any given request received by each funding source.
- Formulas and calculations: Formulas and calculations are built into the template. Before submitting each draw, be sure to check the totals for each funding source to ensure they reflect the total amounts expended for each funding source on the USFTS, and that the sum of all invoices paid reflects the total amount expended on the project.

4. Detailed invoices

Please submit copies of the detailed invoices proposed for reimbursement with each draw that also match with those listed in the uniform invoice tracking spreadsheet in the CDBG column. Please do not submit invoices requested for reimbursement by non-CDBG sources.

Components of a Detailed Invoice:

- Description of work performed
- Number of hours worked to accomplish each item
- Amount being billed for each item
- Work performed date(s) and work items completed
- Beginning and ending billing period dates
- Description of any other eligible expenses incurred during the billing period
- Total amount billed



Reimbursement for Work Performed by Employees of the Grantee

Copies of timesheets or other summary payroll information for work performed by city or county employees must include at a minimum the name, title, time period, activities performed and total amount.

Additional Documentation Required with Grant Administration Invoices

Grant administration invoices must be accompanied by a work log detailing the tasks performed for each day work was performed, number of hours spent, hourly rate of pay and total amount billed for the given period.

Sub-Consultant Invoices

If the work of a subconsultant appears on an engineering or architecture invoice, e.g., for geotechnical, mold remediation, grant administration services, a copy of the subconsultant invoice must be submitted.

No Multipliers

CDBG can only reimburse for actual services performed, without multipliers. If an invoice includes the work of a subconsultant, CDBG cannot reimburse for any mark-up or multiplier added.

Examples of Detailed Invoices

Different types of services provided will have invoicing specific to that service. For example, the following are examples of detailed invoices for the three most common types of invoices reimbursed with CDBG funds: grant administration, engineering and construction:



a. Grant administration

| Administrators | | | | Invoice# | 1 | |
|--|---|--------------------|-----------|-----------------|----|--|
| Bill to: Town of XYZ | | | | | | |
| Services Covered 8, Services for: Waste | /1/2015 - 9/1/2015 water Project | | | | | |
| Date | Activity | Hourly Rate | # Hours | Total Due | | |
| 8/1/2015 | Help Town with budget | 40 | 1 | \$40.00 | | |
| 8/3/2015 | Attend council meeting | 40 | 2 | | | |
| 8/25/2015 | Finalized budget | 40 | 1 | \$40.00 | | |
| | Total Services | | | \$160.00 | | |
| Expenses: | | # of | | | | |
| Date | miles/day | | | | | |
| | Mileage to attend council | | | | | |
| 8/3/2015 | meeting | 60 | 0.555 | \$33,30 | | |
| | postage to send start-up | | | 200 | | |
| 8/3/2015 | documents | | | \$6.70 | | |
| | Total Expenses | | | \$40,00 | | |
| | Total Invoice #11 | | | \$200.00 | | |
| | I personally or the organization the project listed above | nat I represent ha | ve furnis | hed the service | 25 | |
| Service Provider | Date | | | | | |



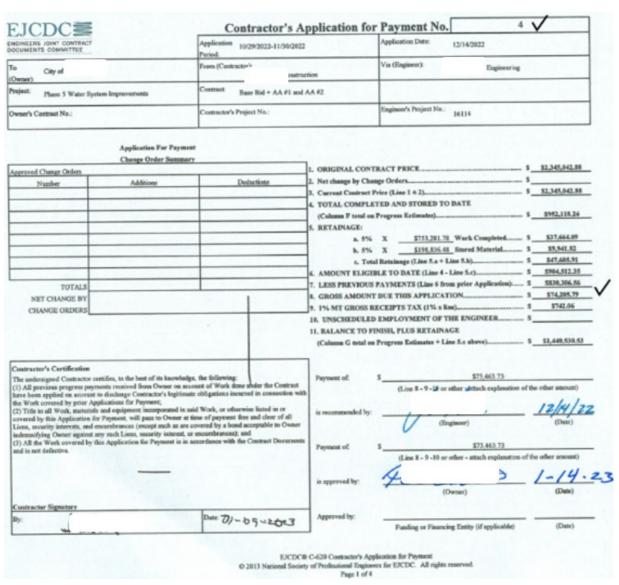
b. Engineering

Lump-sum contracts typically do not provide for adequate and sufficient documentation for reimbursement of project expenses with CDBG funds and they are generally not allowed for design and construction engineering services. Cost-plus contracts are not allowable on CDBG projects.

| Water & Sewer District | Invoice number Date Project 1 | | 26486 05/26/2022 | |
|--|-------------------------------------|----------------|---------------------|------------------|
| | | | | |
| Professional Services from April 17, 2022 through May 21, 2022 | | | | |
| | Amount | | | |
| 60-13 Task Order No. 2 - Hydrogeologic Investigation | | | | |
| 60.8-13 Amendment #5: DNRC-RRGL Grant Application | | | | |
| Contract Amount | 2,500.00 | | | |
| Percent Complete | 100.00 | | | |
| Prior Billed | 0.00 | | | |
| Total Billed | 2,500.00 | | | |
| | 2.140.240.000.000 | Current Billed | | 2,500.00 |
| | | Total | - | 2,500.00 |
| Task Order No. 2 - Hydrogeologic Investigation | | | _ | |
| Hydrogeologic Investigation | | | | |
| Professional Fees | | | | |
| Piolessional Pees | | | | Billed |
| | | Hours | Rate | Amount |
| Engineer 5 | | 3.50 | 176.00 | 616.00 |
| Project Management | | | | |
| Professional Fees | | | | |
| | | | | Billed |
| | | Hours | Rate | Amount |
| Engineer 5 | | 2.00 | 176.00 | 352.00 |
| Grant Administration | | | | |
| Professional Fees | | | | |
| | | | | Billed |
| Part of the second seco | | Hours | | Amount |
| Project Administrator | | 1.75 | | 227.50 |
| Certified Grant Writer 1 | | 2.50 | 136.00 | 340.00 |
| | Phase subto | otal | | 567.50 |
| Amendment #1: Test Well Construction | | | | |
| Professional Fees | | | | |
| | | Hours | Rate | Billed Amount |
| Engineer 5 | | 0.50 | | 88.00 |
| Consultant | | 2.00 | ., | 00.00 |
| | | | | Billed |
| | | Units | Rate | Amount |
| | | | | 2,112.99 |
| | Phase subto | otal | _ | 2,200.99 |



- c. Construction, also known as contractor's pay application
 - Signatures of architect/engineer, contractor and owner (owner is optional)
 - Additional pages following pay app demonstrating work completed, stored materials, etc.
 - Total amount of contractor's pay app must appear on invoice tracking, before
 deduction of 1% gross receipts tax. GRT should not appear on invoice tracking. If
 the GRT must be split out on the invoice tracking as a separate invoice, CDBG
 funds cannot be used for reimbursement.





5. Project progress report

The project progress report serves as the project's contractually required quarterly report due at the end of each calendar year quarter, e.g., March 31, June 30, Sept. 30 or Dec. 31. A separate quarterly report is not necessary if a progress report is received that quarter with a request for reimbursement. The progress report provides Commerce with information on the use of the funds requested and the progress and status of the project. On the report, the grantee must describe the status of all activities in the scope of work, including the percentage complete, costs incurred, funds remaining, projected completion date, any significant problems encountered in carrying out the project and the scope of any necessary modifications the grantee is requesting in the scope of work, budget or implementation schedule. If key dates identified in the current implementation schedule have changed, please submit a revised implementation schedule to Commerce.

- 6. Labor standards documentation (during construction only)
 - Copies of employee interviews
 - Forms and instructions included in labor standards officer toolkit
 - Copy of certification of labor compliance signed by LSO
 - The form is included with this toolkit. The form and instructions are also included in the labor standards officer toolkit.
 - Copies of marked-up certified payrolls
 - Forms and instructions are included in the labor standards officer toolkit.