Leominster CDBG-DR Infrastructure and Flood Mitigation Program

DRAFT Core Policies and Step-by-Step Procedures

Massachusetts Executive Office of Housing and Livable Communities (HLC) | City of Leominster

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General Introduction and Purpose. HUD has allocated a total of $7,954,000 in CDBG-DR funding to Massachusetts to support recovery and mitigation efforts following the Presidentially-declared major disaster DR-4780-MA – Massachusetts Severe Storms and Flooding, issued on May 15, 2024.

This document provides general guidance for the use of the allocated CDBG-DR funds. The purpose of the following policies and procedures is to establish a concise, auditable procedure for selecting, approving, implementing, monitoring and closing Community Development Block Grant-Disaster Recovery (CDBG-DR) infrastructure and flood-mitigation projects, in accordance with the requirements set forth by the U.S. Department of Housing and Urban Development ("HUD"). This manual supplements but does not replace the existing Massachusetts CDBG administrative model and HLC's certified Phase II procedures.

Document control and use

Control	Requirement
Program	2023 disaster recovery; infrastructure and flood mitigation only
State grantee	HLC (formerly EOHLC in historical certifications)
Municipal subrecipient	City of Leominster
Controlling authorities	HUD-approved Massachusetts Action Plan and amendments; applicable CDBG-DR Universal Notice and amendments; award agreement; federal/state requirements
Approval status	Working draft. HLC program, fiscal, procurement and legal review required before issuance.

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1. Governance, roles and project intake

HLC administers this allocation using the regular MA CDBG grant framework, supplemented by the CDBG-DR Universal Notice and approved Action Plan. Leominster is the municipal subrecipient and implements approved projects. HLC retains oversight and HUD reporting responsibility. No project is treated as approved merely because it is described in the Action Plan. Funding remains contingent on documented eligibility, national objective, disaster nexus, financial review and required clearances.

[Universal Notice III.A.2; HLC Phase II fraud and procurement certifications]

Required procedure

1. HLC publishes or communicates the project submission instructions, allowable activity types, submission deadline and required forms to Leominster.

2. Leominster designates a project manager, municipal procurement officer, fiscal contact and authorized signatory for each proposed activity.

3. Leominster submits a project description, mapped location, 2023 disaster nexus, damage/need evidence, scope, cost estimate, schedule, proposed outcomes, funding sources and operations-and-maintenance plan.

4. HLC logs the submission, assigns a Senior CDBG Program Representative, checks completeness and requests missing information in writing.

5. HLC creates a project file and records each review, revision, decision and authorization with a date and responsible staff member.

Required project file

Application and certification; scope/map; cost basis; proposed schedule; funding sources; project contacts; correspondence; approval and amendment history.

2. Project eligibility and approval

HLC approves only activities that satisfy an eligible CDBG-DR activity, applicable national objective, disaster connection, approved Action Plan scope and cost reasonableness. Leominster must request written approval before material scope, budget, location, beneficiary, schedule or funding-source changes. HLC rechecks environmental, DOB, national objective and Action Plan consistency as applicable.

[Universal Notice III.A.2, III.A.4 and applicable III.B provisions]

1. HLC screens the proposed work against the Action Plan and applicable eligible-activity authority; documents any exclusions or limitations.

2. Leominster supplies disaster damage reports, engineering assessments, photographs, flood records or comparable evidence linking the work to the qualifying 2023 event or approved mitigation purpose.

3. HLC identifies and documents the applicable national objective and method of proof before commitment.

4. HLC evaluates engineering feasibility, readiness, site control, budget reasonableness, permits, anticipated procurement, environmental review and implementation schedule.

5. Two HLC CDBG Program Representatives review the application; the Community Development Manager or designee reviews scoring/comments; the review is memorialized in a staff memorandum.

6. The Undersecretary reviews the recommendation and the HLC Secretary provides final funding approval under the certified fraud-prevention procedure.

7. HLC executes a written agreement stating scope, budget, deadlines, performance measures, required clauses, reporting and remedies; issue written authorization only after applicable pre-activity conditions are satisfied.

Documented evidence of completion

Eligibility/national objective worksheet; disaster-nexus evidence; cost estimate; staff memorandum and approval chain; signed agreement; project-specific clearance checklist.

3. Minimizing displacement and relocation

HLC and Leominster will minimize displacement and comply with applicable Uniform Relocation Act ("URA"), Section 104(d), Residential Anti-Displacement and Relocation Assistance Plan ("RARAP"), and disability-access requirements. HLC must have an applicable CDBG-DR RARAP from Leominster before implementing activities. HLC working with the subrecipient to have a RARAP tailored to Disaster Recovery and it will be required as part of subrecipient agreement. Leominster may not initiate acquisition or any activity that may cause displacement until HLC has documented applicable notices, planning, resources and authorization. [Universal Notice III.A.2.a; III.B.15.a; 49 CFR Part 24; 24 CFR Part 42]

1. At intake, Leominster identifies whether the project involves acquisition, easements, occupied property, business access interruption, temporary relocation or displacement of people or entities.

2. HLC records an applicability determination. For projects with no displacement potential, the file explains why relocation requirements are not triggered.

3. Where displacement may occur, HLC/Leominster review the applicable local RARAP and determine required notices, eligibility, advisory services, accessibility accommodations and relocation benefits before any displacing action.

4. Leominster obtains appropriate professional relocation support and assesses affected persons/entities through site visits, interviews and needs assessments as appropriate.

5. Before displacement or temporary relocation, Leominster must prepare a documented relocation budget considering market conditions, acquisition, moving costs, replacement options and professional services.

6. HLC reviews and approves the relocation plan and confirms delivery of required notices and assistance; Leominster retains proof of communications and payments.

7. Monitor relocation outcomes and resolve complaints under applicable procedures.

Required records

Screening determination; RARAP reference; affected-person inventory (protected appropriately); notices; needs assessments; budget; relocation calculations; payment proofs; complaint resolution.

4. Hazard mitigation and resilience

Construction, reconstruction and rehabilitation will incorporate measures that reduce natural hazard risk and withstand chronic stresses and extreme weather. HLC will identify and report resilience performance measures in Disaster Recovery Grant Reporting (DRGR). [Universal Notice III.A.2.b]

1. Leominster describes the hazard(s) addressed—e.g., riverine flooding, drainage failure, erosion, overtopping or stormwater overload—and documents the source of risk information.

2. Engineering/design personnel evaluate feasible risk-reduction measures and applicable design standards, including future flood conditions and useful life of the asset.

3. The project application identifies selected measures, expected benefits, baseline conditions, performance metrics, cost and design assumptions.

4. HLC reviews whether the mitigation scope is consistent with the approved Action Plan and the applicable project purpose and is adequately supported by technical documentation.

5. Leominster incorporates approved measures into bid documents and construction specifications; changes affecting resilience are submitted for HLC review.

6. HLC establishes relevant resilience measures in DRGR and compares reported outputs and outcomes with project documentation.

7. At completion, Leominster submits engineer certification, as-builts or equivalent verification of installed measures.

Example measures (project-dependent)

Culvert hydraulic capacity; drainage conveyance or storage; bridge elevation/clearance; protected utility components; reduced repetitive flooding or improved service continuity. Please note these are examples, and not mandatory metrics for every project.

Required records

Hazard assessment; alternatives/design memorandum; drawings/specifications; resilience performance baseline and target; inspections; completion verification.

5. Infrastructure needs, sustainability and coordination

Projects must address documented disaster-related infrastructure needs, support applicable local/regional risk-reduction objectives, coordinate with other investments and provide for long-term operation and maintenance. [Universal Notice III.A.4(i)–(iv)]

1. Leominster identifies unmet infrastructure need and estimated cost through engineering evidence, local plans, capital records and consultation with appropriate public works/emergency management personnel.

2. HLC and Leominster review relevant local and regional hazard mitigation, flood management and capital plans and document the project's consistency or explain any difference.

3. Leominster identifies planned or ongoing federal, state, local and private capital projects that could overlap or complement the proposed activity.

4. The application lists other potential funding sources and any sequencing or coordination needed to avoid redundant work and double payment.

5. Leominster identifies the future asset owner/operator and provides an operations-and-maintenance plan covering staffing, inspection, repair, lifecycle costs and a realistic non-CDBG-DR funding source.

6. HLC checks that recurring maintenance/ordinary repair costs are not charged as eligible capital improvements absent an independently supported eligibility basis.

7. At closeout, Leominster certifies asset acceptance and ongoing maintenance responsibility.

Required records

Unmet-needs assessment; relevant plan excerpts; coordination correspondence; other capital funding inventory; signed O&M responsibility statement; asset acceptance record.

6. Duplication of benefits (DOB)

HLC prohibits assistance for the same loss and purpose already covered by another source under Stafford Act Section 312 and Appendix C, including "MA CDBG-DR Prevention of Duplication of Benefits" policy (revised March 25, 2026). [Universal Notice III.A.4(v), Appendix C; HLC Phase II DOB certification]

1. Leominster submits the infrastructure/hazard mitigation DOB worksheet, digital funding-sources worksheet, signed affidavit (notarized if possible), and backup documentation. Please complete every field, using N/A where no responsive information exists. The affidavit quantifies the 2023 disaster loss, is signed under penalties of perjury, and commits the applicant to repay duplicative assistance.
2. HLC assesses total eligible disaster-related project need before deducting other assistance.
3. HLC identifies assistance received and reasonably anticipated (awarded but not yet received), including FEMA, USACE, insurance, SBA where relevant, state/local sources, charitable funds and other financing. Leominster discloses claim/application status and supplies supporting records. Before award, HLC independently verifies FEMA/USACE availability or reimbursement eligibility and checks the best, most recent available funding information.
4. HLC documents and excludes nonduplicative assistance under the applicable Appendix C framework, including funds for a different purpose, funds used for another eligible purpose, funds unavailable to the applicant, private loans not guaranteed by SBA, and other applicable exclusions. The eligibility and treatment of each source must be documented.
5. HLC deducts duplicative assistance from the documented total need to calculate the maximum eligible CDBG-DR award before commitment. Assigned CDBG Senior Program and Fiscal Representatives review the worksheet, backup and determination during application review.
6. For local/state capital funding formerly planned but now unavailable, Leominster supplies capital plan/budget records and evidence that funds are not currently set aside; HLC documents the conclusion.
7. Before releasing funds, HLC obtains a signed repayment commitment and applicable Subrogation and Assignment Agreement from the relevant subgrantee or contractor under the certified policy. The grant agreement requires immediate notice of later assistance for the same purpose, reassessment and recovery of any duplication under applicable federal requirements.

Critical records

Signed DOB affidavit and funding-source worksheets; backup and latest-source checks; seven-step Appendix C calculation; FEMA/USACE availability verification; prior capital-plan evidence; signed repayment/subrogation instruments; reassessment and recapture records.

7. Timeliness, expenditures and outcomes

HLC will monitor expenditures and outcomes against quarterly projections from the first quarter funds are available through full expenditure, upload projections to DRGR and publish required information, in accordance with the fund distribution and expenditure requirements provided in the Universal Notice. HLC's Phase II procedure additionally requires monthly expenditure monitoring. [Universal Notice III.A.2.c, III.B.8; HLC Phase II timeliness certification]

1. Before execution, Leominster submits project milestones, quarterly spending forecasts and quarterly outputs/outcomes; HLC consolidates program-level projections and expected program income, if any.

2. HLC enters required projections in DRGR and posts them on the CDBG-DR website according to applicable publication rules.

3. Leominster submits requisitions by email to the assigned Senior CDBG Program Representative, ordinarily biweekly or on another agreed schedule, with invoices, proof of cost and other supporting documents.

4. HLC's Senior Program and Fiscal Representatives review eligibility and accuracy before approving each requisition; record any questioned costs or corrections.

5. HLC maintains a master tracking workbook of actual and projected project expenditures and implementation notes; monitor expenditures at least monthly.

6. HLC's Program and Fiscal Representatives meet with the Community Development Manager at least monthly to review spending, delays and risks.

7. At least quarterly, HLC will compare actual expenditure and outcome performance to forecasts; document variances, remedial milestones and follow-up, and consider early monitoring or reprogramming when appropriate.

Required records

Baseline and updated quarterly forecasts; DRGR entries; website publication evidence; requisition packets; tracking workbook; monthly meeting notes; variance/corrective-action log.

8. Procurement and contract administration

Leominster is the procuring entity through its authorized municipal Procurement Officer; HLC monitors compliance. Procurement follows applicable state, federal, local and CDBG-DR alternative requirements, including full and open competition and pre-contract cost/price evaluation. [Revised HLC Phase II procurement certification, March 27, 2026; applicable 24 CFR 570.489 provisions]

1. Leominster identifies the procurement category and governing procurement authority before solicitation; document the method selected and any legal/procurement review.

2. The Municipal Procurement Officer prepares and approves the solicitation, cost or price estimate and analysis, competition method, conflict screening and required clauses. Every procured contract must identify its period of performance or completion date and performance requirements; include liquidated damages except where the Universal Notice exempts general management consulting services from that requirement.

3. Leominster conducts and documents competition, evaluation, selection, responsibility checks, cost/price analysis and award in accordance with applicable rules.

4. Municipal Procurement Officer reviews and signs off on procurements conducted by any entity acting on Leominster's behalf, where required by the certified policy.

5. HLC checks procurement documentation and price/cost reasonableness before contract execution or at another applicable pre-contract control point; deficiencies are corrected before affected costs are accepted. HLC retains governmental oversight, policy development and financial management responsibilities and does not delegate these inherently governmental functions to a contractor.

6. Leominster monitors contract performance, change orders, inspections, invoices, labor and material requirements and closeout; material changes require documented approval.

Contract controls. Leominster must ensure applicable CDBG-DR procurement requirements flow to subgrantees, contractors and subcontractors. Administrative support may be contracted for consistent with 2 CFR 200.459, but HLC may not contract away inherently governmental oversight, policy development or financial management.

Minimum procurement file

Procurement determination; independent estimate; solicitation and publication; bids/proposals; evaluation; conflict disclosures; cost/price analysis; municipal signoff; executed contract with completion date, performance standards and applicable liquidated damages; change orders; invoice/inspection records.

9. Fraud, waste and abuse prevention

HLC and Leominster must prevent, detect, report and address fraud, waste and abuse consistent with the CDBG-DR Phase II certification and HLC's agency-wide Fraud, Waste & Abuse Prevention Policy & Reporting Procedure (last updated October 2025). The agency-wide policy complements, and does not displace, federal award-specific reporting requirements. [Universal Notice II.A.1.d; 2 CFR 200.113]

1. Leominster certifies application accuracy and submits sources and uses, a narrative project budget, estimates or comparable cost evidence, and the most recent three years of audited financial statements and/or formal annual reports as required by the certification; HLC documents any applicable exception or missing record for review.

2. HLC applies the certified two-reviewer application process, supervisory review, Undersecretary review and Secretary approval chain.

3. HLC staff attend HUD OIG fraud-related training when offered. HLC requires representatives of all subrecipients to attend the applicable HUD OIG training before project-level commitment, as provided in the revised CDBG-DR certification; HLC also documents completion of agency-wide employee fraud training under the HLC policy.

4. Leominster maintains a conflict-of-interest policy, discloses conflicts promptly and complies with applicable federal and Massachusetts requirements, including M.G.L. c. 268A.

5. Leominster uses internal controls for invoice approval, segregation of duties, supporting records and contractor oversight; HLC tests compliance during risk-based monitoring.

6. Leominster promptly reports suspected fraud, waste or abuse to HLC. HLC employees follow agency reporting channels, including prompt referral to the Internal Controls Officer. Credible evidence triggering 2 CFR 200.113 must be disclosed promptly in writing to HUD OIG; Leominster must also notify HLC. Other allegations may be referred to HUD OIG or appropriate state authorities under applicable policy.

7. HLC's Internal Controls Officer, in consultation with the Fraud Prevention Team and General Counsel as applicable, coordinates agency investigation and escalation. HLC documents referrals, confidentiality protections, corrective actions, suspension or termination of payments, recovery and case resolution. Staff must not independently confront suspected individuals or disclose investigative details outside authorized channels.

Contract and prevention controls. HLC–Leominster agreements must require pass-through compliance with applicable federal fraud, waste and abuse requirements, sufficient internal controls, timely mandatory disclosures, and authorized suspension, termination, repayment or recapture remedies. HLC provides contractor-fraud prevention resources and directs affected beneficiaries to appropriate reporting and assistance channels where relevant.

Agency oversight. The Internal Controls Officer conducts an annual fraud-risk assessment; managers maintain prevention controls. The agency-wide policy establishes whistleblower protection, confidentiality, investigation/referral protocols and employee training tracked through MassPerform.

Monitoring standard

HLC's certified procedure requires at least one project monitoring review during the project life, plus review of quarterly progress reports; frequency and method are risk-based.

Required records

Certifications; review memorandum; training attendance; conflict disclosures; internal-control and annual risk-assessment records; quarterly reports; monitoring reports; reports to the Internal Controls Officer and HUD OIG where required; investigation/referral and corrective-action closure records.

10. Cross-cutting compliance screening

Before authorizing implementation and before reimbursing affected costs, HLC and Leominster must document applicability and compliance with cross-cutting requirements. A "not applicable" decision must be reasoned and recorded; incorporation by reference alone is not a substitute for project-level screening.

Screen	Required checkpoint / evidence
Environmental review	Determine responsible entity (re is Leominster) and Part 58 process; document clearance and applicable choice-limiting-action restrictions before commitment or construction.
Floodplain, wetlands, flood insurance	Screen location and applicable federal floodplain/wetland review and insurance obligations; retain maps and determinations.
Labor standards	Determine Davis-Bacon applicability; if triggered, retain wage determination, clauses, certified payroll, interviews and enforcement records.
Section 3	Determine applicability under 24 CFR Part 75; retain outreach, labor-hour tracking and reports as applicable.
Civil rights and accessibility	Document nondiscrimination, language access, reasonable accommodations, and applicable design/accessibility standards.
Build America, Buy America	Screen covered infrastructure projects for domestic-content requirements, applicability exceptions and waivers; retain product certifications.
Other federal conditions	Screen debarment, conflicts, acquisition/URA, historic preservation and other triggered conditions.

Release control

HLC issues a dated clearance/authorization record showing each triggered requirement, responsible reviewer, disposition and unresolved condition. Leominster must not undertake prohibited choice-limiting actions before environmental clearance.

11. Monitoring, transparency and corrective action

HLC monitors projects using the regular MA CDBG risk-based approach, while meeting CDBG-DR reporting, transparency and program-specific requirements. [Universal Notice III.A.6 and applicable reporting provisions; HLC Phase II fraud and timeliness certifications]

1. HLC completes a risk assessment considering project complexity, staff changes, past performance, spending, requisitions and progress reports.
2. HLC schedules at least one project monitoring review during the life of each project, plus ongoing desk review of quarterly progress and fiscal submissions; onsite or virtual monitoring is risk-based. Review may include checklists, interviews, project site inspections, audit reports and subrecipient oversight records.
3. HLC reviews eligibility, national objective, DOB, procurement, environmental clearance, financial transactions, labor, Section 3, mitigation outcomes and construction documentation as applicable.
4. HLC documents findings, concerns and required corrective actions with responsible party and due date; Leominster submits evidence of correction.
5. HLC validates correction and records closure; unresolved significant deficiencies are escalated for enhanced oversight, payment restriction or other authorized remedy.
6. HLC updates DRGR and required public website content on the applicable schedule; program-specific procedures may be published in phases subject to Universal Notice timing requirements.
7. HLC updates its citizen participation plan to address required consultation and website procedures.

Public communications

Maintain accessible program information, procedures, amendments, quarterly projections and other required notices on the designated disaster recovery website. Confirm exact publication and consultation deadlines from the full applicable notice and HLC website certification.

12. Project completion and closeout

HLC closes projects only after verifying completion, financial reconciliation, performance, applicable continuing obligations and record retention. Closing a project does not terminate surviving federal requirements.

1. Leominster certifies physical completion, provides final inspection/engineering acceptance, as-builts or equivalent records, and evidence of delivered resilience measures.
2. Leominster submits final expenditures, contract closeout, change-order reconciliation, final funding-source and DOB update, and outstanding claims or liabilities.
3. HLC reconciles approved budget, requisitions, DRGR expenditures, national objective evidence, project outputs and applicable program income.
4. HLC verifies completion of monitoring corrective actions and confirms ongoing operations-and-maintenance owner, funding and responsibilities.
5. HLC records closeout determination, unresolved continuing requirements and records custodian; communicate any follow-up reporting or monitoring duties to Leominster.
6. Leominster and HLC retain records for the applicable federal retention period and longer where litigation, claims, audit findings, real-property or other requirements extend retention.

Closeout package

Final project report; acceptance documentation; final cost ledger; final DOB certification; performance evidence; environmental/procurement/labor file index; O&M certification; corrective-action closure; HLC closeout approval.

Record retention verification

HLC and Leominster must comply with the recordkeeping requirements of 24 CFR 570.490, as amended by the Universal Notice waivers and alternative requirements, and must maintain records of performance in DRGR, as described in the Universal Notice

Appendix A. Project-stage approval checklist

Stage	Required evidence	HLC release decision
Intake	Application, disaster nexus, scope, schedule, cost estimate	Complete / return
Eligibility	Eligible activity, national objective, Action Plan consistency	Approve / deny
Funding	Seven-step DOB, sources, capital-plan evidence, award calculation	Approve amount
Pre-implementation	Environmental clearance, relocation, permits, procurement applicability	Authorize next stage
Construction	Contract, labor/BABA/Section 3 as applicable, inspections	Approve eligible requisitions
Performance	Quarterly outputs, expenditure comparison, DRGR, variance log	Continue / correct
Closeout	Final costs, DOB update, O&M, completed corrective actions	Close project

Project signoff log (repeat for each project)

Decision	Reviewer / title	Date	Evidence location
Eligibility and national objective			
DOB / funding approval			
Environmental / relocation clearance			
Procurement review			
Final project closeout			

Appendix B. Phase II / Phase III alignment

Certified source	Operational linkage in this manual
Prevention of DOB (II.A.1.e)	Section 6: revised March 2026 affidavit, latest funding verification, FEMA/USACE checks, award calculation and repayment/recapture.
Fraud, Waste and Abuse (II.A.1.d)	Sections 2, 9, 11: revised certification plus agency-wide policy; training, disclosures, Internal Controls Officer, monitoring and referrals.
Timely Expenditures (II.A.1.f)	Section 7: monthly monitoring, biweekly requests, quarterly forecasts, management meetings
Procurement (II.A.1.b)	Section 8: revised March 2026 contract performance, liquidated damages, competition, cost analysis and retained HLC oversight.
Financial management controls (II.A.1.a)	NOT PROVIDED: verify fiscal approval chain, bank/accounting controls, reconciliations, cash management
Disaster recovery website (II.A.1.c)	NOT PROVIDED: verify publication responsibility, timelines and website controls
Capacity/staffing assessment (II.A.1.g)	Prior certification referenced; update title to Fiscal Manager and reflect position filled May 2026. Verify current duties and backup coverage.

Appendix C. Authority and source register

Primary program authority: HUD CDBG-DR Universal Notice applicable to 2023 disasters, as amended; HUD-approved Massachusetts Action Plan and amendments; HUD grant agreement; Housing and Community Development Act; Stafford Act Section 312; applicable 24 CFR Part 570 and other cited federal requirements.

User-provided Phase III excerpts: III.A.2 (all-program procedures); III.A.2.a (displacement/RARAP); III.A.2.b (mitigation); III.A.2.c (quarterly expenditures/outcomes); III.A.4 (infrastructure); III.A.6 and III.A.6.a (website/consultation).

HLC Phase II documents supplied or updated for this draft (historically labeled EOHLC): “MA CDBG-DR Prevention of Duplication of Benefits” (revised March 25, 2026); “MA CDBG-DR Procurement Policy” (revised March 27, 2026); “Detecting Fraud, Waste and Abuse of Funds – Section II.A.1.d” (revised text provided); “MA Procedures to Determine Timely Expenditures” (prior source). Supporting agency-wide policy: “EOHLC Fraud, Waste & Abuse Prevention Policy & Reporting Procedure” (last updated October 2025).

Authority hierarchy

If a conflict exists, controlling federal law, the applicable Universal Notice and HUD-approved Action Plan/award terms govern.

Implementation forms to maintain separately

Project application and eligibility checklist; DOB affidavit and funding-sources worksheet; capital funding availability attestation; environmental/relocation screening; procurement file checklist; quarterly forecast/report; requisition checklist; risk-based monitoring form; corrective-action log; final closeout certification.