



CDBG-MIT PROGRAM

CITY OF LAKELAND

SUBRECIPIENT AGREEMENT MT047

RESPONSE TO TECHNICAL ASSISTANCE PLAN (TAP)

January 5, 2027

Summary

Following the Florida Department of Commerce’s (FloridaCommerce) recent monitoring in September 2025, FloridaCommerce identified several areas in the City of Lakeland’s (Subrecipient) CDBG-MIT Program where technical assistance (TA) could strengthen the program’s success. The objective of monitoring is to assist the Subrecipient in addressing any potential gaps or deficiencies in processes, ensuring compliance with 24 CFR 570, 2 CFR 200, the terms and conditions in the Subrecipient Agreement, and the relevant Federal Register Notice(s).

Action Items

The following Action Items were identified during the monitoring visit. The following outlines the corrective steps taken:

ACTION ITEM	FOCUS AREA	CORRECTIVE STEPS NEEDED	CORRECTIVE STEPS TAKEN
<p>1. Section 3 & Davis-Bacon Labor Standards Procedures</p> <p>During a review of the City’s policies, the City was unable to provide a policy or standard operating procedure for city-related or contractor-related Section 3 and Davis-Bacon compliance. As required by Attachment E, Sections 9 and 10 of the Subrecipient Agreement,</p>	<p>Conformance to Subrecipient Agreement</p>	<p>It is recommended that the City implement a policy or standard operating procedure inclusive of all labor standards requirements. Specifically, the City should create written processes detailing how it will ensure compliance with Section 3 and Davis-Bacon requirements for this project. A policy template</p>	<p>The City has updated its Grants Administration Handbook to include Davis-Bacon Labor Standards Policy and Procedures for CDBG (MIT and DR) construction projects, to include:</p> <ul style="list-style-type: none"> • Labor Standards Compliance Checklist • Notification of Participation and Certifications for Prime Contractor and Sub-Contractor(s) • With Attachments A-G & Non-Compliance Tracking Sheet <ul style="list-style-type: none"> ○ Attachment A – WH-347 – Certified Payroll Form ○ Attachment B – SF 1444 – Request for Additional Classifications and U.S.

<p>the City should develop written processes that detail how it will ensure Section 3 and Davis-Bacon compliance for applicable projects.</p>		<p>addressing these requirements was provided to the City as part of this TAP.</p>	<p>Department of Labor Prevailing Wage Resource Book</p> <ul style="list-style-type: none"> ○ Attachment C – Employee/Employer Wage-Scale Agreement ○ Attachment D – Employee Certification of Payment of Restitution and/or Liquidated Damages ○ Attachment E – Wage Restitution and Liquidated Damages Form ○ Attachment F – Record of Employee Interviews ○ Attachment G – WH-1321 - Workers Rights Poster ○ Attachment H – Labor Standards Non-Compliance Tracking Sheet <p>These additions can be found in the City’s Grants Administration Handbook. (See Davis-Bacon Labor Standards Policy and Procedures page 43 and APPENDIX M).</p>
<p>2. Citizens’ Complaints, Program Appeal, and HUD Hotline Information</p> <p>After a review of the City’s website, it was determined there is no information on the public site regarding how citizens can file complaints or file an appeal with the Subrecipient as required by Section 15 of the Subrecipient Agreement. The HUD complaint and Fair Housing hotline information was also not found on the City’s website.</p>	<p>Conformance to Subrecipient Agreement</p>	<p>It is recommended that the City update CDBG-MIT project webpage to include details on citizens’ right to file a complaint or an appeal and information on how to file such complaint or begin an appeal with the City concerning this project.</p> <p>The CDBG Disaster Recovery Website aid was provided to the City as part of this TAP, along with a recommendation to establish written</p>	<p>The City has updated its CDBG-MIT project webpage to include details on citizens’ right to file a complaint or appeal, and information on how to file such a complaint or begin an appeal with the City, Florida Commerce, and HUD regarding this project. A link to the project webpage is:</p> <p>https://www.lakelandgov.net/departments/public-works/lakes-stormwater/lake-bonnet-drainage-project/</p> <p>and is located under the title “Citizen Complaints, Appeals and Contacts: CDBG-DR Commerce and HUD Fair Housing”.</p> <p>Additionally, the City’s Grant Administration Handbook now includes the Enhancing Public Access – CDBG MIT paragraph, which summarizes the requirements for public transparency for CDBG-MIT and CDBG-DR grants. (See pages 55 – 58).</p>

		policies to define the schedule with which the CDBG project webpage will be updated.	
<p>3. Duplication of Benefits Policy</p> <p>The City was unable to provide a policy or procedure inclusive of language acknowledging the City's responsibility for detecting potential duplication of benefits or procedures for assessing all potential sources of federal funds, as required by 88 FR 5848. Subrecipients of this grant are responsible for developing policies and procedures to outline these components in accordance with the Subrecipient Agreement.</p>	Conformance to Subrecipient Agreement	<p>It is recommended that the City update its Grants Administration Handbook to include language specific to Duplication of Benefits or establish a standalone policy to the effect. Written policy should include at minimum, an evaluation method for identifying all potential sources of federal awards, processes for mitigating potential duplication, and repayment/recapture procedures if duplication is identified.</p> <p>A policy template addressing these requirements was provided to the City as part of this TAP.</p>	The City has updated its Grants Administration Handbook to include Duplication of Benefits Background Information and Policy and Procedures . (See pages 58 – 60). Future coordination efforts will be conducted with the City's Finance Department and the City's Emergency Manager to incorporate it into the City's Finance Policy Manual and Disaster Preparedness Plan.
<p>4. Record Retention</p> <p>As per the City's Grant Administration Handbook, the City's record retention policies follow the State's GSI Retention schedule for grant records (i.e., schedule 422), which is a period of five (5) years from grant closeout. Per</p>	Conformance to Subrecipient Agreement	<p>It is recommended that the City include in its policies language stating that records will be retained for a minimum period of six (6) years, "<i>or longer as specified in the Subrecipient Agreement.</i>"</p>	The City has modified and included in its Grant Administration Handbook the record retention policy for federally funded grants (i.e., CDBG MIT, DR, and FEMA) to include 6(e) (vs. 5(5) as noted in TAP) wherein the City is subject to 2 CFR part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards. The City shall retain sufficient records to show its compliance with the terms of the funded agency's agreements and the compliance of all

<p>the Subrecipient Agreement, Section 5(e), the Subrecipient shall maintain records for a period of up to six (6) years from the date of final closeout.</p>			<p>subrecipients, contractors, subcontractors, and consultants paid from funds under the agreement for a period of six (6) years from the date the funded agency issues the final closeout for the award. (See the full policy modification in the City's Grant Administration Handbook – titled Federally Funded Grants Record Retention (CDBG [MIT, DR and FEMA] on page 34).</p>
<p>IMPROVEMENT ITEM</p>			
<p>1. Use of Force/Excessive Force Policy The City was able to provide a policy that incorporates some of the use of force elements as required by the grant. However, the current policy does not incorporate all the required use of force elements found in 24 CFR 91.325 (b)(6). It is recommended that these elements be incorporated in policies and procedures, as required by HUD.</p>		<p>The Excessive Force provisions were provided to the City as part of this TAP.</p>	<p>The Excessive Force provisions have been referred to the City of Lakeland City Manager, who oversees the City of Lakeland Police Department, to assess and amend the current Use of Force policy to incorporate the required excessive force policy provisions.</p>