



**BOARD OF COMMISSIONERS  
REGULAR SCHEDULED MEETING  
12:00 P.M., August 26, 2025  
GHURA's Main Office (via Zoom)  
1<sup>st</sup> floor, Conference Room, Sinajana  
**AGENDA****

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**I. ROLL CALL**

**II. BOARD MEETING PUBLIC ANNOUNCEMENTS**

1<sup>st</sup> Printing – Tuesday, August 19, 2025

2<sup>nd</sup> Printing – Sunday, August 24, 2025

**III. APPROVAL OF PREVIOUS BOARD MINUTES – August 12, 2025**

**IV. NEW BUSINESS**

**PAGE (S)**

- |  |         |
|--|---------|
| 1. Intent of Award .....   | 1 - 6   |
| IFB GHURA-25-10; Renovations of 9 Public Housing Units at<br>AMPs 1, 2 and 4   |         |
| 2. Intent of Award .....   | 7 - 9   |
| IFB GHURA-25-001-CDBG-DR; Fleet Vehicles   |         |
| 3. Resolution No. FY2025-027 .....   | 10 - 21 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Fraud Waste, and Abuse Policy       |         |
| 4. Resolution No. FY2025-028 .....   | 22 - 30 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Website Policy                      |         |
| 5. Resolution No. FY2025-029 .....   | 31 - 43 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Duplication of Benefits Policy      |         |
| 6. Resolution No. FY2025-030 .....   | 44 - 51 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Policy Ensuring Timely Expenditures |         |
| 7. Resolution No. FY2025-031 .....   | 52 - 60 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Program Income                      |         |
| 8. Resolution No. FY2025-032 .....   | 61 - 70 |
| Resolution approving the Guam Community Development Block<br>Grant-Disaster Recovery Conflict of Interest Policy         |         |

**V. EXECUTIVE DIRECTOR'S REPORT**

1. Project Updates

**VI. GENERAL DISCUSSION / ANNOUNCEMENTS**

1. HR Item: Executive Management's Performance Evaluations for:
  - Executive Director, Elizabeth F. Napoli  
(Rating Period: July 8, 2024 – July 7, 2025)
  - Deputy Director, Fernando B. Esteves  
(Rating Period: August 22, 2024 – August 21, 2025)
2. Next proposed scheduled Board Meeting: Tuesday, September 09, 2025  
@ 12:00 p.m.

**VII. ADJOURNMENT**



# GUAM ENVIRONMENTAL PROTECTION AGENCY AHENSAN PRUTEKSION LINA'LA GUAHAN

**BOARD OF DIRECTORS REGULAR BOARD MEETING:** Thursday, August 21, 2025 • 4:00PM  
Guam EPA Administration Conference Room: 17-3304 Mariner Avenue Tiyen Barrigada, Guam  
**MEETING LINK:** <https://meet.google.com/ddu-cyks-sge>

## AGENDA:

- |   |   |
|---|---|
| I. Call to order  | VI. Status Reports                      |
| a. Determination of quorum                                      | a. DPW MOA update                       |
| b. Proof of due notice of meeting                               | b. Notices of Violations                |
| II. Approval of Agenda  | c. Enforcement                          |
| III. Approval of meeting minutes:<br>07/24/2025 regular meeting | d. OD Permit                            |
| IV. Board Discussion / Action                                   | e. RRF Programs                         |
| a. Septic Tanks - Rules and Regulations                         | f. Guam EPA Fee Schedule                |
| V. Administrator's Report                                       | VII. Public comments                    |
|   | VIII. Next meeting date and adjournment |

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**Barrigada Municipal Planning Council**  
Municipality of Barrigada  
124 Luayao Lane, Barrigada, Guam 96913  
Tel: 671-734-3725/3737/3859 Fax: 671-734-1988



## AGENDA

A Regular Barrigada Municipal Planning Council Meeting will be held on Thursday, AUGUST 28, 2025, at 6:00 P.M., Barrigada Mayor's Office Conference Room.  
Livestreamed on the Barrigada MPC Facebook Page.

- |   |   |
|---|---|
| I. Call to Order  | VI. Status Reports                      |
| II. Roll Call   | a. DPW MOA update                       |
| III. Meeting Notification   | b. Notices of Violations                |
| IV. Approval of Minutes for May 15, 2025  | c. Enforcement                          |
| V. Approval of Financial Reports  | d. OD Permit                            |
| VI. Mayor's Reports   | e. RRF Programs                         |
| VII. Old Business   | f. Guam EPA Fee Schedule                |
| A. 81st Liberation  | VII. Public comments                    |
| B. Kalaguak Memorial  | VIII. Next meeting date and adjournment |
| VIII. New Business  |   |
| A. Summary Zone Change  |   |
| Application for Lot 9NEW-6NEW-5-1, Block D, Tract 9 Barrigada Heights, Barrigada Village Guam; Rezoning from "R-1" Zone to "R-2" (Multi-Family) for Wei Liang Li. |   |
| B. New Barrigada Logo   |   |
| IX. Announcements   |   |
| X. Adjournment  |   |

In compliance with the American with Disabilities Act, individuals requiring special accommodations may contact Mayor June Blas at 671-734-3737 or email: [barrigadadoffice@gmail.com](mailto:barrigadadoffice@gmail.com)

Funding Source provided by: MR. WEI LIANG LI/APPLICANT



## Kumision Inangokkon Tano' Chamoru (Chamoru Land Trust Commission)



### Chamoru Land Trust Commission Regular Board Meeting Thursday, August 21, 2025 at 1:00PM

Chamoru Land Trust Conference Room, 590 S. Marine Corp Drive ITC Building, Suite 223, 2nd Floor Tamuning, Guam. Public Comments may be made at [cltc.admin@cltc.guam.gov](mailto:cltc.admin@cltc.guam.gov) To view the meeting virtually, log on to GovGuam Live-YouTube or Google Meeting link: [meet.google.com/nrg-qyhe-uzp](https://meet.google.com/nrg-qyhe-uzp)

## AGENDA

- |  |   |
|--|---|
| I. Call to Order - Certification of Quorum Present   | VI. Status Reports                      |
| II. Certification - Public Notice Requirements   | a. DPW MOA update                       |
| A. Guam Daily Post (August 14, 2025 and August 19, 2025)   | b. Notices of Violations                |
| B. Guam Public Notice Website ( <a href="https://notices.guam.gov">https://notices.guam.gov</a> )                                | c. Enforcement                          |
| III. Approval of Minutes: July 17, 2025 (Regular Board Meeting)  | d. OD Permit                            |
| IV. Administrative Director's Report   | e. RRF Programs                         |
| V. Old Business  | f. Guam EPA Fee Schedule                |
| A. Constituent Matters   | VII. Public comments                    |
| 1. Roby Jean Quintanilla   | VIII. Next meeting date and adjournment |
| 2. Richard Blas Santiago   |   |
| 3. Leah Rojas  |   |
| 4. Karen Kasperbauer Perez   |   |
| B. Department of Land Management MOA   |   |
| C. Guam Waterworks Authority MOA   |   |
| D. Bill No.32-38(COR), Resolution 2025-001   |   |
| E. Tract 10123, Yigo   |   |
| VI. New Business   |   |
| A. Constituent Matters   |   |
| 1. Angela N.C. Santos  |   |
| 2. JoËen Marie Almandres   |   |
| 3. Mark Mendiola Almandres   |   |
| 4. Daniel C. Lujan   |   |
| 5. Emilia S.N. Palacios  |   |
| 6. Pedro B. Blas   |   |
| 7. Pedro B. Blas Jr.   |   |
| 8. Ryan Muna   |   |
| 9. Martina Cruz  |   |
| B. Designation of Public Information Officer   |   |
| C. Lessee request for Waiver on Property Taxes   |   |
| D. Switch/Transfer of Application Date/Time  |   |
| E. Switch of Application Type  |   |
| F. Letter from the Governor - Request for a Designated Staging Site for Junk Vehicles  |   |
| VII. Public Comment(s)   |   |
| VIII. Next Meeting - Thursday, September 18, 2025 at 1:00PM, CLTC Conference Room, Suite 223, ITC Building, Tamuning, Guam 96913 |   |
| IX. Adjournment  |   |

In compliance with American with Disabilities Act, individuals requiring special accommodations or services should contact (671)300-3296 or email [cltc.admin@cltc.guam.gov](mailto:cltc.admin@cltc.guam.gov)  
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| Responsible for the day-to-day, hands on, front line supervision of carpenters & helpers & ensure compliance with safety & quality standards.   |                         |
| <b>3 - CONSTRUCTION EQUIPMENT MECHANIC WITH 2 YEARS EXP.</b>  | <b>\$24.00 PER HR.*</b> |
| Diagnose, adjust, repair or overhaul mobile mechanical, hydraulic & pneumatic equipment such as cranes, bulldozers, graders & conveyors used in construction.   |                         |
| <b>7 - CRANE OPERATOR SUPERVISOR WITH 2 YEARS EXP.</b>  | <b>\$34.00 PER HR.*</b> |
| Must have NCCCO certification or equiv. Applicants with expired certs or equivalencies must be able to pass refresher course & required exams. Responsible for the day-to-day, hands on, front line supervision of crane operators & truck operators & competent in operating from 10t to 600t cranes, to include mobile through to crawler cranes.   |                         |
| <b>3 - MECHANIC SUPERVISOR WITH 2 YEARS EXP.</b>  | <b>\$32.00 PER HR.*</b> |
| Must have ASE Master Technician certificate or equiv. Responsible for the day-to-day, hands on, front line supervision of construction equipment mechanics & ensure compliance with safety & quality standards.   |                         |
| <b>3 - OCCUPATIONAL HEALTH AND SAFETY TECHNICIAN SUPERVISOR</b>   | <b>\$34.25 PER HR.*</b> |
| Responsible for the day-to-day, hands on, front line supervision of occupational health and safety technicians & ensure compliance with safety & quality standards.   |                         |
| <b>2 - RIGGER SUPERVISOR WITH 2 YEARS EXP.</b>  | <b>\$30.00 PER HR.*</b> |
| Must have NCCCO certification or equiv. Applicants with expired certs or equivalencies must be able to pass refresher course & required exams. Responsible for the day-to-day, hands on, front line supervision of riggers & ensure compliance with safety & quality standards.   |                         |
| <b>6 - WELDER WITH 1 YEAR EXP.</b>  | <b>\$24.00 PER HR.*</b> |
| Must pass practical/qualification "hands-on" welding test. Responsible for various types of weld preparation, welding & weld finishing operations to manufacture product & to customer drawings, specs or other forms of instruction, working at customer's site or company site.   |                         |
| <b>Benefits:</b> Paid roundtrip airfare for off-island hire; lodging provided; local transportation from employer's designated lodging facility to/from jobsites; medical insurance provided; dental insurance optional to employee @ 100% cost; eligible to participate in 401k after 1 year employment; 11 paid public holidays; vacation leave accrued at 3.08 hrs per worked week; sick leave accrued at .77 hrs per worked week. |                         |
| <b>*Special wage rate:</b> Work to be performed on DPRI-funded projects and projects covered by Davis-Bacon, ServiceContracts Act, and/or Executive Order 14206 will be paid no less than the indicated wage rate but may be paid more where special rates apply.   |                         |
| Successful applicant must be able to obtain military base access. Off-island hires must complete a health screening prior to working on Guam.   |                         |
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| For complete job duties, apply in person at American Job Center<br>414 W. Soledad Avenue, Suite 300 GCIC Building, Hagatna, Guam<br>Or apply online at <a href="http://www.hireguam.com">www.hireguam.com</a> ; Enter Keyword: 2025-101   |                         |



## GHURA

**Guam Housing and Urban Renewal Authority**  
*Aturidat Ginima' Yan Rinueban Siudad Guahan*  
117 Bien Venida Avenue • Sinajana, Guam 96910  
Phones: (671) 477-9851 • Fax: (671) 300-7565 TTY: (671) 472-3701  
Website: [www.ghura.org](http://www.ghura.org)



Loisles A. Leon Guerrero  
Governor of Guam

Joshua F. Tenorio  
Lieutenant Governor of Guam

**THE GUAM HOUSING AND URBAN RENEWAL AUTHORITY**  
Board of Commissioners Meeting • Tuesday, August 26, 2025 at 12:00 PM.  
This meeting is open to the public via Zoom

Topic: GHURA BoC Meeting, Tuesday, August 26, 2025, @12PM  
Time: Aug 26, 2025 12:00 PM Guam, Port Moresby  
Join Zoom Meeting  
<https://us06web.zoom.us/j/84097171653?pwd=HRJqCwgs3vLWn650CYWftKTnBQy11>  
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- AGENDA:**
- |   |  |
|---|--|
| I. ROLL CALL  | VI. GENERAL DISCUSSION/ANNOUNCEMENTS   |
| II. BOARD MEETING PUBLIC ANNOUNCEMENTS  | 1. Project Updates   |
| III. APPROVAL OF PREVIOUS BOARD MINUTES - August 12, 2025   | 1. HR Item: Executive Management's Performance Evaluations for:<br>• Executive Director, Elizabeth F. Napoli (Rating Period: July 8, 2024 - July 7, 2025)<br>• Deputy Director, Fernando B. Esteves (Rating Period: August 22, 2024 - August 21, 2025) |
| IV. NEW BUSINESS  | 2. Next proposed scheduled Board Meeting - Tuesday, September 09, 2025 @ 12:00 p.m.  |
| 1. Intent of Award: IFB GHURA-25-10; Renovations of 9 Public Housing Units at AMPs 1, 2 and 4   |  |
| 2. Intent of Award: IFB GHURA-25-001-CDBG-DR; Fleet Vehicles  |  |
| 3. Resolution No. FY2025-027; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Fraud Waste, and Abuse Policy       |  |
| 4. Resolution No. FY2025-028; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Website Policy                      |  |
| 5. Resolution No. FY2025-029; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Duplication of Benefits Policy      |  |
| 6. Resolution No. FY2025-030; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Policy Ensuring Timely Expenditures |  |
| 7. Resolution No. FY2025-031; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Program Income                      |  |
| 8. Resolution No. FY2025-032; Resolution approving the Guam Community Development Block Grant - Disaster Recovery Conflict of Interest Policy         |  |
| V. EXECUTIVE DIRECTOR'S REPORT  |  |

The complete Board packet may be viewed on our website at [www.ghura.org](http://www.ghura.org).  
For more information, please contact Audrey Aguon at 475-1378 and for special accommodations, please contact Chief Planner - Designated Section 504 / ADA Coordinator at 475-1322 or TTY 472-3701.  
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ChST 10:01 AM, Friday, August 22, 2025

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### FIRST NOTICE: GHURA Board of Commissioners Meeting - 08/26/2025 @ 12:00pm ChST

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### FIRST NOTICE: GHURA Board of Commissioners Meeting - 08/26/2025 @ 12:00pm ChST

#### ANNOUNCEMENT

**Posted on:** 08/19/2025 08:52 AM

**Posted by:** Julie Lujan

**Department(s):** GUAM HOUSING AND URBAN RENEWAL AUTHORITY (GHURA)

**Division(s):**

**Notice Topic(s):** BOARD MEETING

**Types of Notice:** ANNOUNCEMENT

**For Audience(s):** PUBLIC

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GHURA Board of Commissioners Meeting will be held on August 26, 2025 at 12:00pm ChST. This meeting is open to the public and is available via Zoom as well as GHURA's YouTube Live Stream Channel. Please click on the link below for more information.

</app/webroot/userfiles/files/GHURA%27s%20August%2026%202025%20BOC%20Mtg.%20Announcement.pdf>



**RAY CRUZ HADDOCK, ESQ.  
PACIFIC LAW PROFESSIONALS, PLLC**

277 Chalan Santa Papa  
Hagåtña, Guam 96910  
Telephone: 671-477-0000  
mail@pacdawpro.com

Attorneys for Petitioner

**IN THE SUPERIOR COURT OF GUAM  
IN THE MATTER OF THE ESTATE  
OF  
HENRY ARCEO TORRES,  
Deceased.**

**PROBATE CASE NO. PR0113-25**

**NOTICE OF HEARING**

THIS NOTICE IS REQUIRED BY LAW. YOU ARE NOT REQUIRED TO APPEAR IN COURT UNLESS YOU DESIRE.

NOTICE IS HEREBY GIVEN that Henry Thomas Torres has filed herein a Petition for Letters of Administration upon the above captioned estate of the Deceased, and the time and place of said hearing is in the Superior Court of Guam on **SEP 03 2025** at the hour of **9:00 a.m.**, and all persons interested are hereby notified to appear and show cause, if any they have, why the Petition should not be granted.

Reference is made to said petition for further particulars.

**DATED: JUL 31 2025**

**Janice M. Camacho-Perez  
Clerk of Court, Superior Court of Guam  
/s/ Pauline I. Untalan  
Chamber/Courtroom Clerk**

You may appear in person in the Courtroom of the Honorable Dana A. Gutierrez, located at 120 W. O'Brien Drive, Hagåtña, Guam or you may participate via Zoom by logging onto <https://guamcourts-0rg.zoom.us> and enter Meeting ID: 839 7874 0380 and Passcode: 189701. For technical assistance, please call (671)475-3207 five (5) minutes prior to the designated hearing time.

**TORRES LAW GROUP**

Suite 201, 130 Aspinall Avenue, Hagåtña, Guam 96910  
Telephone: (671) 477-9891-3 • Facsimile: (671) 472 2601  
Attorneys for Petitioner

**IN THE SUPERIOR COURT OF GUAM  
IN THE MATTER OF THE ESTATE OF  
TAKAHIRO IIO,  
Deceased.**

**PROBATE CASE NO.: PR0111-25  
NOTICE OF TIME SET FOR HEARING  
APPLICATION FOR LETTERS OF  
ADMINISTRATION**

NOTICE is hereby given that a Petition for the issuance to **PHILLIP TORRES** for letters of administration has been filed in this Court and that on **SEP 03 2025 at 9:00 a.m.**, of said day, in the courtroom of the Superior Court of Guam, Hagåtña, Guam, has been set for the hearing of said Petition and all persons interested are hereby notified to then and there appear and show cause, if any they have, why the Petition should not be granted. Reference is hereby made to the said Petition for further particulars.

To attend or to participate in the hearing remotely, go to <https://guamcourts-0rg.zoom.us> and enter **Zoom Meeting ID: 839 7874 0380** and **Passcode: 189701**.

Dated at Hagåtña, Guam, on JUL 24 2025.

**JANICE M. CAMACHO-PEREZ  
Clerk of Court, Superior Court of Guam  
By /s/ Pauline I. Untalan  
Chamber/Courtroom Clerk**

You may appear in person in the Courtroom of the Honorable Dana A. Gutierrez, located at 120 W. O'Brien Drive, Hagåtña, Guam or you may participate via Zoom by logging onto <https://guamcourts-0rg.zoom.us> and enter Meeting ID: 839 7874 0380 and Passcode: 189701. For technical assistance, please call (671)475-3207 five (5) minutes prior to the designated hearing time.

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Website: [www.ghura.org](http://www.ghura.org)



Louides A. Leon Guerrero  
Governor of Guam

Joshua F. Teonico  
Lieutenant Governor of Guam

**THE GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
Board of Commissioners Meeting • Tuesday, August 26, 2025 at 12:00 PM.**  
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- II. BOARD MEETING PUBLIC ANNOUNCEMENTS
- III. APPROVAL OF PREVIOUS BOARD MINUTES – August 12, 2025
- IV. NEW BUSINESS
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- V. EXECUTIVE DIRECTOR'S REPORT
  1. Project Updates
- VI. GENERAL DISCUSSION / ANNOUNCEMENTS
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- VII. ADJOURNMENT

The complete Board packet may be viewed on our website at [www.ghura.org](http://www.ghura.org).  
For more information, please contact Audrey Aguon at 475-1378 and for special accommodations, please contact Chief Planner – Designated Section 504 / ADA Coordinator at 475-1322 or TTY 472-3701.  
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CHST 3:00 PM, Friday, August 22, 2025

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### SECOND NOTICE: GHURA Board of Commissioners Meeting - 08/26/2025 @ 12:00pm ChST

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#### SECOND NOTICE: GHURA Board of Commissioners Meeting - 08/26/2025 @ 12:00pm ChST

##### ANNOUNCEMENT

**Posted on:** 08/22/2025 02:50 PM

**Posted by:** Julie Lujan, Systems Programmer

**Department(s):** GUAM HOUSING AND URBAN RENEWAL AUTHORITY (GHURA)

**Division(s):**

**Notice Topic(s):** BOARD MEETING

**Types of Notice:** ANNOUNCEMENT

**For Audience(s):** PUBLIC

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GHURA Board of Commissioners Meeting will be held on August 26, 2025 at 12:00pm ChST. This meeting is open to the public and is available via Zoom as well as GHURA's YouTube Live Stream Channel.

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**BOARD OF COMMISSIONERS  
REGULAR SCHEDULED MEETING  
12:00 P.M., August 12, 2025  
GHURA's Main Office (via Zoom)  
1<sup>st</sup> floor, Conference Room, Sinajana  
AGENDA**

**I. CALL TO ORDER**

Pursuant to the Open Government Law of Guam and the Bylaws of the Authority, the Board of Commissioners' regularly scheduled board meeting was called to order at **12:10P.M., Tuesday, August 12, 2025**, at the GHURA Sinajana Main Office, 1st floor Conference room. Vice Chairman Sanchez indicated that **5 of 6** members of the Board of Commissioners were present, representing a quorum and that the meeting would proceed as scheduled.

<b>Viewed virtually via</b>	<b>ZOOM:</b> <a href="https://us06web.zoom.us/j/84097171653?pwd=HRJqCwgsz3vLWn650CYWftKTNByQ1.1">https://us06web.zoom.us/j/84097171653?pwd=HRJqCwgsz3vLWn650CYWftKTNByQ1.1</a>  <b>YOUTUBE:</b> <a href="https://www.youtube.com/channel/UCGqKWU0kOmT0FOLYn48ULag">https://www.youtube.com/channel/UCGqKWU0kOmT0FOLYn48ULag</a>		
<b>BOC Commissioners Attendance</b>	Dr. John Rivera, Chairman Nate Sanchez, Vice Chairman Anisia Delia, Commissioner Emilia Rice, Commissioner Victor Torres, Commissioner Karl Corpus, Resident Commissioner <i>*No Requests to attend meeting virtually were submitted via email</i>	Virtual <input type="checkbox"/> Virtual <input type="checkbox"/> Virtual <input type="checkbox"/> Virtual <input type="checkbox"/> Virtual <input type="checkbox"/> Virtual <input type="checkbox"/>	In-Person <input type="checkbox"/> In-Person <input checked="" type="checkbox"/> In-Person <input checked="" type="checkbox"/> In-Person <input checked="" type="checkbox"/> In-Person <input checked="" type="checkbox"/> In-Person <input checked="" type="checkbox"/>
<b>GHURA Management/ Staff</b>	Elizabeth F. Napoli, Executive Director <input checked="" type="checkbox"/> Fernando B. Esteves, Deputy Director <input type="checkbox"/> Audrey Aguon, Special Assistant <input checked="" type="checkbox"/> Narcissa Ada, AMP1 Manager <input type="checkbox"/> Gina Cura, AMP2 Manager <input type="checkbox"/> Patrick Bamba, AMP3 Manager <input type="checkbox"/> Philomena San Nicolas, AMP4 Manager <input type="checkbox"/> Jolyn Terlaje <input type="checkbox"/> Miguel Fernandez <input type="checkbox"/> Michael Ricuyal <input type="checkbox"/> Maria Cherry Canete <input checked="" type="checkbox"/>	Julie Lujan, MIS Administrator <input type="checkbox"/> Sonny Perez, AE Manager <input checked="" type="checkbox"/> Frances Danieli, Controller <input checked="" type="checkbox"/> Katherine Taitano, RP&E Chief Planner <input type="checkbox"/> Dr. Kimberly Bersamin, HR Administrator <input checked="" type="checkbox"/> Antonio Camacho, Procurement <input checked="" type="checkbox"/> Pearly Mendiola, GT Manager <input type="checkbox"/> Nicole Alejandro, Section 8 Administrator <input type="checkbox"/> Section 8 Staff and Fiscal Staff <input type="checkbox"/> Ervin Santiago, AE <input checked="" type="checkbox"/> Patrick Lucas <input type="checkbox"/>	Carlo Ongklungel, HR <input checked="" type="checkbox"/> Tyler Mortera, PR <input type="checkbox"/> Talia Pablo, HR <input checked="" type="checkbox"/>        Andrew Maglona, AE <input checked="" type="checkbox"/>
<b>Legal Counsel</b>	Eliseo M. Florig Jr., Legal Counsel for GHURA <input checked="" type="checkbox"/>		
<b>Public</b>	Mr. Malcolm Stiles, Property Owner		

**II. BOARD MEETING PUBLIC ANNOUNCEMENTS**

**1<sup>st</sup> Printing – Tuesday, August 5, 2025**  
**2<sup>nd</sup> Printing – Sunday, August 10, 2025**

**ACKNOWLEDGED BY ACTING CHAIRMAN SANCHEZ**



**III. APPROVAL OF PREVIOUS BOARD MINUTES: [497/25]** Commissioner Delia moved to approve the board meeting minutes of July 22, 2025. Commissioner Corpus seconded the motion. Motion passed unanimously.

**IV. NEW BUSINESS:**

AGENDA ITEM	DISCUSSION	ACTION
<p><b>1. Change Order #1- for Base Bid #1- GHURA-25-002; Renovation of MOD9 for AMPs 1, 2, and 4</b></p>	<p><b>[498/25] Executive Director Napoli read Change Order #1- for Base Bid #1- GHURA-25-002; Renovation of MOD9 for AMP1, 2, and 4 on pages 1-2 in the GHURA Board of Commissioners (BoC) August 12, 2025, meeting packet, which is also found on the GHURA website, <a href="http://www.ghura.org">www.ghura.org</a>.</b></p> <p>Mr. Sonny Perez, AE Manager, added the following:</p> <ul style="list-style-type: none"> <li>• A fire occurred in the unit located at AMP1, Sinajana.</li> <li>• Unit was placed on the Modernization for Public Housing (MOD) list, which had units previously scheduled.</li> <li>• Procurement processed the work order and contract was awarded.</li> <li>• Contractor began work on the other units.</li> <li>• By the time work on the burned unit began, the water damages had become so severe.</li> </ul> <p>Acting Chairman Sanchez inquired about the status of the tenants in the unit. Mr. Andrew Manglona, AE Planner, stated that the tenants were relocated for the renovation.</p> <p>Commissioner Torres asked why the board did not direct the contractor to schedule work on the burned unit first? Mr. Manglona indicated that immediately after the fire had occurred at the unit, the AMP1 manager requested that the GHURA AE division assess the unit for the insurance. He said that it had been several years since the unit had been scheduled for MOD and it was decided to</p>	

AGENDA ITEM	DISCUSSION	ACTION
	<p>waive the insurance and to add it to the list of units scheduled to be modernized.</p> <p>Commissioner Delia asked that AE specify which unit was scheduled for Change Order #1-GHURA-25-002- Renovation of MOD 9. Mr. Manglona indicated that it was located at 3A Eron, AMP1, Sinajana.</p>	<p>[499/25] Commissioner Delia moved to approve Change Order #1- for Base Bid #1- GHURA-25-002; Renovation of MOD9 for AMP1, 2, and 4 to replace water damaged wood doors and jambs, bedroom closets in the amount of \$5,000. Commissioner Rice seconded the motion. There were no objections. Motion passed unanimously.</p>

AGENDA ITEM	DISCUSSION	ACTION
<p><b>2. Change Order #1 for Base Bid #2-GHURA-25-002; Renovation of MOD9 for AMPs 1, 2, and 4.</b></p>	<p><b>[500/25] Executive Director Napoli read the Change Order #1 for Base Bid #2-GHURA-25-002; Renovation of MOD9 for AMPs 1, 2, and 4 on pages 3-4 in the Board of Commissioners (BoC) August 12, 2025, meeting packet, which is also found on the GHURA website, <a href="http://www.ghura.org">www.ghura.org</a>.</b></p> <p>Acting Chairman Sanchez asked how the contractor had not seen the work indicated in the Change Order? Mr. Manglona indicated that the issues were encountered during the intercepting of walls that were demolished. During the demolition, mold, mildew and corroded metals were discovered. Acting Chairman Sanchez requested that assessments happen on-site to prevent future change orders. Mr. Perez indicated that the issues would not have been discovered if the contractor had not been forced to demolish the wall revealing rot and black mold.</p> <p>Commissioner Torres asked if the costs were reasonable. Mr. Manglona confirmed that they were.</p> <p>Acting Chairman Sanchez requested for before and after photos for future projects.</p>	<p><b>[501/25] Commissioner Torres moved to approve Change Order #1 for Base Bid #2-GHURA-25-002; Renovation of MOD9 for AMPs 1, 2, and 4 in the amount of \$44,900.00 to be done within thirty (30) calendar days ending on the deadline October 25, 2025. Commissioner Rice seconded the motion. There were no objections. Motion passed unanimously.</b></p>



## V. OLD BUSINESS

AGENDA ITAM	DISCUSSION	ACTION
<p><b>1. Change Order #1- GHURA-25-001; Rehabilitation of Hagatna Soup Kitchen</b></p>	<p><b>[502/25] Executive Director Napoli indicated that at the previous board meeting a question was presented about whether the purchase and installation of two air conditioner units were additional purchases on top of AC units that were previously approved. Director Napoli stated that the initial request was to replace two out of the four AC units that were inoperable. Two operating units had since broken down and another request to purchase and install was brought before the board as additional AC units. Mr. Perez confirmed that a total of four AC units had been requested before the board.</b></p> <p>Acting Chairman Sanchez asked when the units would be installed. Mr. Manglona indicated that the contract is ongoing and would be installed upon approval from the board. Acting Chairman Sanchez requested that the board be apprised on the progress of this project.</p> <p>Director Napoli indicated that at a previous board meeting, the board moved to approved item request numbers 2, 3, and 4 to avoid any delays. The approval included the four-tree cutting, debris and disposal, and the chain link fence repair. She asked if the board would now move to approve the two air conditioning units for \$5,000.00.</p> <p>Commissioner Delia stated that she would make the motion.</p>	<p><b>[503/25] Commissioner Delia moved to approve Change Order #1- IFB GHURA-25-001; Rehabilitation of Hagatna Soup Kitchen, item #1, the purchase and installation of two additional air conditioner units, 12000 btu, in the amount of \$5,000.00 from the previous board meeting of July 22, 2025. Commissioner Torres seconded the motion. There were no objections. Motion passed unanimously.</b></p>

<p><b>2. Intent of Award-IFB GHURA-25-008; Typhoon Shutters for AMP3</b></p>	<p><b>[504/25] Executive Director Napoli read the Intent of Award-IFB GHURA-25-008; Typhoon Shutters for AMP3, on pages 5-11 in the GHURA Board of Commissioners (BoC) August 12, 2025 packet, also found on the GHURA website, <a href="http://www.ghura.org">www.ghura.org</a>.</b></p> <p>Acting Chairman Sanchez asked whether the tenants were affected during Typhoon Mawar. Mr. Manglona stated that the maintenance staff and several tenants reported difficulty in closing the shutters.</p> <p>Acting Chairman Sanchez asked if AE recognized or anticipates this issue throughout the other AMP sites. Mr. Manglona stated that during the MOD renovations, if the team discovers that shutters have deteriorated, they will be replaced.</p> <p>Commissioner Rice asked for clarification on Genesis Tech Corp’s Non-Conformance result. Mr. Antonio Camacho, Housing Procurement Administrator, stated that the Non-Conformance results indicates that the vendor did not meet the bid criteria and was considered non-responsive.</p> <p>Commissioner Torres inquired about how the shutters are maintained. Mr. Manglona stated that some of the shutters are salvaged for parts to repair other shutter units.</p> <p>Commissioner Delia asked if there were warranties on the shutters. Mr. Manglona indicated that the contract states an eighteen-month warranty.</p> <p>Acting Chairman Sanchez inquired about whether the lifetime of the warranty would need to be included in the motion. Mr. Eliseo Florig, GHURA’s Legal Counsel, stated that the warranty would be included in the contract. He added that what is important to be included in the motion is the amount of the increase, date for completion, and specific date of completion.</p>	<p><b>[505/25] Commissioner Corpus moved to approve the Intent of Award-IFB GHURA-25-008; Typhoon Shutters for AMP3 to Premier International Inc., DBA Carpet Masters &amp; The Shutter Factory in the amount of \$946,959.00, with a timeline of 150 consecutive calendar days with no option period and not to exceed the amount of \$946,959.00. Commissioner Torres seconded the motion. There were no objections. Motion passed unanimously.</b></p>
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## VI. EXECUTIVE DIRECTOR'S REPORT

AGENDA ITEM	DISCUSSION	ACTION
1. Project Updates	<p><b>[506/25] Executive Director Napoli stated the following:</b></p> <ul style="list-style-type: none"><li>• A team from ICF, a technical assistance provider, working on behalf of HUD to support Guam in its administration of the CDBG-DR funding.</li><li>• They are working with the CDBG-DR staff on providing assistance and support in understanding federal requirements and elements of program design to address the recovery needs.</li><li>• GHURA met with ICF, Governor Leon Guerrero, and Lt. Governor Tenorio in the morning.</li><li>• Training happening at UOG.</li></ul>	No action taken



## VI. GENERAL DISCUSSIONS/ANNOUNCEMENTS

<b>AGENDA ITAM</b>	<b>DISCUSSION</b>	<b>ACTION</b>
<b>1. HR Item- Executive Management Performance Evaluation for:</b> <ul style="list-style-type: none"> <li>• <b>Executive Director Elizabeth F. Napoli-</b> July 8, 2024-July 7, 2025)</li> <li>• <b>Deputy Director, Fernando B. Esteves-</b> August 22, 2024-August 21, 2025</li> </ul>	<p>[507/25] Dr. Kimberly Bersamin stated the following:</p> <ul style="list-style-type: none"> <li>Courtesy update and reminder for the board members</li> <li>Mandated to evaluate the Executive Director and Deputy Director</li> <li>HR will compute both evaluations</li> <li>Once completed, HR will report the results to the board</li> <li>Director Napoli’s Performance Evaluation was due on July 8, 2025</li> <li>Deputy Director Esteves’s Performance Evaluation is due on August 22, 2025.</li> <li>Four out six evaluations have been submitted.</li> <li>Hoped to report both results at the September 6, 2025 board meeting</li> </ul>	No action taken
	<p>[508/25] Mr. Florig introduced Mr. Malcolm Stiles to the board and stated the following:</p> <ul style="list-style-type: none"> <li>Mr. Stiles is currently an Asan property owner.</li> <li>A part of his property encroaches on GHURA property and has a GWA water well system</li> <li>Based on research done by the Community Development division, GHURA was not the only owner of the property. There was another owner.</li> <li>GHURA has not had any success at contacting the other owner</li> <li>Information of the other owner will be provided to the board once a response is given to Mr. Stiles.</li> <li>2 Options for Mr. Stiles:               <ul style="list-style-type: none"> <li>If the owner is located:                   <ol style="list-style-type: none"> <li>Change the property and give it to Mr. Stiles</li> <li>With regard to the boundary, sell the boundary line at FMV</li> </ol> </li> </ul> </li> </ul>	No action taken

	<p>to Mr. Stiles resulting in a clear title.</p> <ul style="list-style-type: none"> <li>• GHURA will be responding to Mr. Stiles with a decision within the week.</li> <li>• He recommended that should Mr. Stiles have further questions for the board after receiving GHURA's response, he may request to be added to the board agenda for the next BoC meeting.</li> <li>• He also recommended that the board not hear arguments on the merits of the case because nothing has been resolved and not until a decision is made with regard to this.</li> </ul> <p><b>[509/25] Mr. Malcolm Stiles, property owner, stated the following:</b></p> <ul style="list-style-type: none"> <li>• Issue is the boundary between his property and GHURA's property, as recorded by Department of Land Management, is a small portion cuts through his home.</li> <li>• He approached GHURA with this issue years ago</li> <li>• Many years ago, GHURA was tasked with redeveloping Asan village</li> <li>• At the time, Asan was very underdeveloped</li> <li>• There was a severe flood</li> <li>• GHURA was charged with bringing Asan village into compliance and redeveloping it as a modern sub-division.</li> <li>• This included surveying the village and recording it with the Department of Land Management.</li> <li>• The line that GHURA had established during the survey, cuts through a corner of his building.</li> <li>• He requested that GHURA fix it</li> <li>• In two years, he has had no response from GHURA.</li> </ul>	
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<p><b>2. Next proposed scheduled board; Tuesday, August 26, 2025 @12PM</b></p>	<p>Acting Chairman Sanchez reassured Mr. Stiles that the board would look into his concern and work with Mr. Florig to get his concerns rectified.</p> <p><b>[510/25] Acting Chairman Sanchez requested that commissioners mark their calendars.</b></p>	
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**VII. ADJOURNMENT:**

AGENDA ITEM	DISCUSSION	ACTION
		<b>[511/25]</b> <b>Commissioner Torres</b> <b>moved to adjourn the</b> <b>August 12, 2025</b> <b>GHURA BoC meeting.</b> <b>Commissioner Rice</b> <b>seconded the motion.</b> <b>The motion passed.</b> <b>The meeting was</b> <b>adjourned at 1:11P.M.</b>

SEAL

\_\_\_\_\_  
**Elizabeth F. Napoli**  
**Board Secretary/Executive Director**

**Date** \_\_\_\_\_

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY**  
**ATURIDAT GINIMA YAN RINUEBAN SIUDAT**

**MEMORANDUM:**

**TO:** Board of Commissioners

**FROM:** Elizabeth F. Napoli   
Executive Director

**DATE:** August 20, 2025

**SUBJECT:** Intent of Award  
IFB GHURA-25-10  
Renovations of 9 Public Housing Units at AMP's 1, 2 and 4

Bid opening for the subject project was held on July 30, 2025, at 2:00 p.m. A total of 13 bidders registered for the bid and given bid specifications of which 3 submitted a bid. Listed below are the results of the bid submissions, which were opened and read out aloud publicly.

No:	Vendor:	Bid Bond	300 Consecutive Calendar Days.
1	O H Construction	[X] 15% of total bid amount	<b>Awarded-</b> Base Bid Item Nos. 1, 2 and 3.  <b>Total: \$383,500.00</b>
2	Genesis Tech Corporation	[X] 15% of total bid amount	Base Bid Item Nos. 1, 2 and 3.  <b>Total: \$432,200.00</b>
3	Mega United Corporation	[X] 15% of total bid amount	Base Bid Item Nos. 1, 2 and 3.  <b>Total: 620,640.00</b>

<b>Government Estimate</b>	<b>\$378,360.00</b>
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A breakdown is required for each item description as noted below:

**O.H. Construction**

Item #	Item Description	Estimated Quantity	Unit		Unit Bid Price
			Measure	Price	
	<b>Base Bid 1.</b>				
	5A VD Perez, Mongmong (4-bedroom)			\$63,000.00	
	2MJLG, Asan (3-bedroom)			\$ 49,000.00	
	1 JAP, Yona (2-bedroom)			\$ 19,000.00	
	Total Amount Base Bid 1:				\$131,000.00

	<b>Base Bid 2.</b>				
	6 RD8A, Dededo (4-Bedroom)			\$42,000.00	
	23A RDC8, Dededo (3-Bedroom)			\$29,000.00	
	15A RD8A, Dededo (3-Bedroom)			\$39,000.00	
	15B RD8A, Dededo (3-Bedroom)			\$35,000.00	
	15a & 15B additional electrical work			\$ 9,000.00	
	Total Amount Base Bid 2:				\$154,000.00

Item #	Item Description	Estimated Quantity	Unit	Unit Bid Price	
	<b>Base Bid 3.</b>				
	7 Kayen RS San Agustin, GH-35, Dededo (3 bedroom)			\$57,000.00	
	23A RDC8, Dededo (3-Bedroom)			\$41,500.00	
	Total Amount Base Bid 3:				\$98,500.00

**Genesis-Teach Corporation**

Item #	Item Description	Estimated Quantity	Unit		Unit Bid Price
			Measure	Price	
	<b>Base Bid 1.</b>				
	2MJLG, Asan (3-Bedroom)	1	LS	\$55,000.00	
	5A VD Perez, Mongmong (4-Bedroom)	1	LS	\$65,000.00	
	1 JAP, Yona (2-Bedroom)	1	LS	\$28,000.00	
	Total Amount Base Bid 1:				\$148,000.00

	<b>Base Bid 2.</b>				
	6 RD8A, Dededo (4-Bedroom)	1	LS	\$34,900.00	
	23A RDC8, Dededo (3-Bedroom)	1	LS	\$37,900.00	
	15A RD8A, Dededo (3-Bedroom)	1	LS	\$53,400.00	
	15B RD8A, Dededo (3-Bedroom)	1	LS	\$47,900.00	
	Total Amount Base Bid 2:				\$174,100.00

Item #	Item Description	Estimated Quantity	Unit	Unit Bid Price	
	<b>Base Bid 3.</b>				
	7 Kayen RS San Agustin, GH-35, Dededo (3 Bedroom)	1	LS	\$64,300.00	
	23A RDC8, Dededo (3-Bedroom)	1	LS	\$45,800.00	
	Total Amount Base Bid 3:				\$110,100.00



**Mega United Corp. Ltd.**

Item #	Item Description	Estimated Quantity	Unit		Unit Bid Price
			Measure	Price	
	<b>Base Bid 1.</b>				
	2MJLG, Asan (3-Bedroom)				
	5A VD Perez, Mongmong (4-Bedroom)				
	1 JAP, Yona (2-Bedroom)				
	Total Amount Base Bid 1:	1	LS		\$203,240.00

	<b>Base Bid 2.</b>				
	6 RD8A, Dededo (4-Bedroom)				
	23A RDC8, Dededo (3-Bedroom)				
	15A RD8A, Dededo (3-Bedroom)				
	15B RD8A, Dededo (3-Bedroom)				
	Total Amount Base Bid 2:	1	LS		\$256,200.00

Item #	Item Description	Estimated Quantity	Unit	Unit Bid Price	
	<b>Base Bid 3.</b>				
	7 Kayen RS San Agustin, GH-35, Dededo (3 bedroom)				
	23A RDC8, Dededo (3-Bedroom)				
	Total Amount Base Bid 3:	1	LS		\$161,200.00

The Guam Housing and Urban Renewal Authority's (GHURA) mission is to provide affordable, decent, safe, and sanitary housing through the maintenance of our existing units, to ensure that the facilities owned and managed by GHURA are safe and appealing to the residents.


Property Site Managers have identified projects within their AMPs that require rehabilitation and/or upgrades not only to their public housing units but the sites within their developments that are beyond the scope of maintenance repairs. Such projects include, but not limited to, complete renovation of kitchens and bathrooms, electrical upgrade, plumbing, replacement of interior and exterior doors, and other substantial physical changes that requires upgrades to the units and the sites.

In review of the bid result: O.H. Construction provided the lowest responsive and responsible bid. The committee members determined to proceed with the award of the project to O.H Construction in the amount of \$383,500.00 for Bid Item Nos.: 1, 2 and 3. The following project timelines: Bid Item 1, is 90 consecutive calendar days at the cost of \$131,000.00, Bid Item 2, is 120 consecutive calendar days at the cost of \$154,000.00 and Bid Item 3, is 90 consecutive calendar days at the cost of \$98,500.00 with no option periods, and not to exceed the amount of \$383,500.00.

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
ATURIDAT GINIMA YAN RINUEBAN SIUDAT**

**MEMORANDUM:**

**TO:** Board of Commissioners

**FROM:** Elizabeth F. Napoli   
Executive Director

**DATE:** August 19, 2025

**SUBJECT:** Intent of Award  
IFB GHURA-25-001  
Fleet Vehicles Bid-CDBG-DR

Bid opening for the subject project was held on August 05, 2025, at 10:00 a.m. A total of 3 bidders registered for the bid and given bid specifications of which 3 submitted a bid. Listed below are the results of the bid submissions, which were opened and read out aloud publicly.

No:	Vendor:	Bid Bond	160 Consecutive Calendar Days.
1	Car Plus LLC	[X] 15% of total bid amount	<b>Awarded-</b> Bid Item Nos. 1.1 and 1.3.  <b>Total: \$53,704.00</b>
2	Triple J Enterprise, Inc.	[X] 15% of total bid amount	<b>Awarded-</b> Bid Item Nos. 1.2 and 1.3.  <b>Total: \$58,333.00</b>
3	Moster Auto corporation dba Guam Auto Spot	[X] 15% of total bid amount	<b>Not Awarded-</b> Bid Item Nos. 1.1, 1.2 and 1.3  <b>Total: 187,995.00</b>
<b>Government Estimate</b>			<b>\$385,000.00</b>

A breakdown is required for each item description as noted below:

**Car Plus LLC**

**Awarded Bid Item Nos. 1.1 and 1.3**

Item #	Item Description	Quantity	Unit Cost	Total Cost
1.0	Sports Utility Vehicle ( <b>Non-Conformance</b> )	4 Each	\$ 29,048.00	\$116,192.00
1.1	Sedan	2 Each	\$ 21,852.00	\$ 43,704.00
1.2	Passenger Wagon	1 Each	\$103,028.00	\$103,028.00
1.3	5 Year Power Train and Vehicle Service Plan per each bid item. (Option to Purchase	Per Vehicle		\$ 5,000.00
	Total Amount:			\$267,924.00

**Triple J Enterprises, Inc.**

**Awarded Bid Item Nos. 1.2 and 1.3**

Item #	Item Description	Quantity	Unit Cost	Total Cost
1.0	Sports Utility Vehicle ( <b>Non-Conformance</b> )	4 Each	\$ 24,399.00	\$ 97,596.00
1.1	Sedan	2 Each	\$ 25,584.00	\$ 51,168.00
1.2	Passenger Wagon	1 Each	\$ 56,138.00	\$ 56,138.00
1.3	5 Year Power Train and Vehicle Service Plan per each bid item. (Option to Purchase	Per Vehicle		\$ 12,965.00
	Total Amount:			\$217,867.00

**Monster Auto Corporation dba Guam Auto Spot**

Item #	Item Description	Quantity	Unit Cost	Total Cost
1.0	Sports Utility Vehicle ( <b>Non-Conformance</b> )	4 Each	\$ 31 999.00	\$127,996.00
1.1	Sedan	2 Each	No Bid	No Bid
1.2	Passenger Wagon	1 Each	\$ 56,999.00	\$ 56,999.00
1.3	5 Year Power Train and Vehicle Service Plan per each bid item. (Option to Purchase	Per Vehicle		\$3,000.00
	Total Amount:			\$187,995.00

The Guam Housing and Urban Renewal Authority's (GHURA) mission is to provide affordable, decent, safe, and sanitary housing through the maintenance of our existing units, to ensure that the facilities owned and managed by GHURA are safe and appealing to the residents.

The additional personnel require vehicles to conduct businesses necessary in fulfillment of their job functions. These functions include general administrative functions such as document delivery and pickup of personnel, supplies, and documents between physical locations both internal and external to the agency; community surveys, assessments, and outreach; and project site visits.

In review of the bid result: Cars Plus LLC and Triple J Enterprises, Inc. provided the lowest responsive and responsible bid. The committee members determined to proceed with the award of the vehicles to Cars Plus LLC in the total amount of \$53,704.00 for Bid Item Nos. 1.1 and 1.3 and Triple J Enterprise, Inc. in the total amount of \$58,333.00 for Bid Item Nos. 1.2 and 1.3.



**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-027**

**Moved by:** \_\_\_\_\_ **Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “FRAUD WASTE AND ABUSE POLICY” FOR THE  
GUAM COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b), requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant-Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.a of the Universal Notice (90 FR 4759), GHURA is required to have adequate policies and procedures to detect and prevent fraud, waste, and abuse; now, therefore be it,

**RESOLVED,** that the Board approves the program specific “Fraud, Waste, and Abuse Policy” appended herewith, and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager, shall promulgate and have published subsequent procedures derived from this policy.



**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025  
PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true  
and correct copy of a Resolution duly  
adopted by the Guam Housing and  
Urban Renewal Authority Board of  
Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**



# **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

## **FRAUD, WASTE, AND ABUSE POLICY**

**Aug 14, 2025**

This policy is current as of August 14, 2025. This policy outlines the Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) guidelines for program staff in the identification and prevention of Fraud, Waste and Abuse (FWA). This policy will ensure consistency and clarity on the general guidance for program staff. This policy will be reviewed periodically and updated as necessary. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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## 1.0 Approval of Amendment History

Version	Date	Amendment Reference
Version 1.0	8/26/2025	Initial

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### Amended By:

\_\_\_\_\_  
Fernando B. Esteves

Grant Manager

### Approved By:

\_\_\_\_\_  
Elizabeth F. Napoli

Executive Director

\_\_\_\_\_  
Certifying Date

## 2.0 Purpose

The purpose of this Fraud, Waste, and Abuse Policy is to establish guidelines for the identification, prevention, and reporting of fraudulent activities within the program. This policy aims to protect the integrity of the programs and to ensure that services are provided fairly and equitably to all eligible individuals and families while safeguarding resources and ensuring compliance with statutory, regulatory, and ethical standards. More comprehensive processes and procedures will be provided in the Standard Operating Procedures (SOPs) promulgated for the Guam Housing and Urban Renewal Authority's (GHURA) administration of the grant and its programs.

## 2.1 Overview

This policy outlines GHURA's commitment to preventing, detecting, and addressing all forms of fraud, waste, and abuse that may negatively impact the integrity of the program purpose through the use of CDBG-DR resources. This program policy assures that it has instituted sufficient financial and operational controls to safeguard funds, while effectuating the reasonable and timely expenditure of funds. This policy applies to all employees, contractors, subrecipients and agents of the program, as well as applicants and beneficiaries of program funds. Accordingly, this policy governs any action relating to any irregularity, or suspected irregularity, involving employees, consultants, vendors, contractors, sub-recipients, sub-grantees, applicants or outside agencies conducting and/or performing official business with employees of such agencies, and/or any other parties with a business relationship to CDBG-DR program activities.

## 2.2 Policy Statement

The GHURA administers federal funds for the Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) program allocated by the U.S. Department of Housing and Urban Development (HUD). Critical to its sound administration the corresponding fiduciary obligation to develop sufficient controls to provide reasonable assurance that address unmet needs identified through housing programs, public facilities, economic revitalization, mitigation and planning, and administration activities shall be properly managed pursuant to all applicable laws, regulations, and policies.

## 3.0 Definitions and Examples

**Fraud:** The intentional deception or misrepresentation made by an individual or entity with the knowledge that the deception could result in some unauthorized benefit to themselves or others.



**Waste:** The use of resources without efficiency or effectiveness causing a loss in program integrity.

**Abuse:** Behavior that is inconsistent with the contractual, statutory, or regulatory standards monitored by the GHURA CDBG-DR, which may lead to an unauthorized benefit.

**Examples of Actions that Constitute Fraud, Waste, and Abuse include, but are not limited to:**

- **Misrepresentation of:**
  - Income (Unreported or under-reported);
  - Household composition;
  - Financial resources (transferred or hidden resources);
  - Residency; and/or
  - Citizenship status.
- **Other types of fraud include, but are not limited to:**
  - Using another person's identification;
  - Forging signatures or documents;
  - Concealing access to duplicate funding;
  - Misrepresenting a medical condition to obtain additional benefit; and/or
  - Misusing funds (diverting them for an unintended use).
- **Other actions constituting fraud, waste, and abuse include, but are not limited to:**
  - Any deceitful, dishonest or fraudulent act;
  - Unauthorized disclosure of confidential or private information;
  - Impropriety in handling or reporting money or financial transactions;
  - Profiting as a result of insider knowledge; Disclosing confidential and proprietary information to outside parties;
  - Obtaining contracts through collusion and conspiracy;
  - Accepting or seeking anything of material value from contractors, vendors, or any person that seeks a beneficial decision, contract, or action from CDBG-DR or any subrecipient;
  - Accepting or seeking anything of material value from contractors, vendors, or any person that is providing services for CDBG-DR activities;
  - Misappropriation of funds, securities, supplies, or other assets;
  - Unnecessary cost or expenditures;
  - Diversion of program resources;
  - Theft or embezzlement;
  - False statements, illegal commissions, or kickbacks;
  - Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
  - Any similar suspicious or related irregularity.

## 4.0 Roles & Responsibilities

**Grant Manager:** Responsible for implementing the policies related to the prevention of fraud, waste, and abuse. Responsible for the investigation, resolution, or referrals of all cases involving contractors, subrecipients, applicants, awardees, and beneficiaries. The Grant Manager shall ensure all program staff, internal auditors, and subrecipients attend the CDBG-DR HUD OIG training, subject to availability.

**Lead Compliance Official:** A designee who shall assist in monitoring adherence to this policy, conducts periodic sampling, lead and/or assists in investigations, reports findings, and makes recommendations to the Grant Manager for action involving a contractor, subrecipient, applicant, awardee, or beneficiary.

**Internal Auditor:** An Internal Auditor shall be designated by the Grantee, who is the Governor of Guam, from within the Guam State Clearinghouse having the following responsibilities:

- Conducts periodic program audits, discretionary in size and scope of any and all program activities, and reports findings and recommendations to the Grantee;
- Advises program staff in their efforts to establish an organizational culture systemwide that enforces compliance, encourages prudent judgment, and emphasizes integrity in all levels and processes;
- Assists program staff with the evaluation of internal controls used to detect and mitigate fraud, waste, and abuse, and to make recommendations to continually strengthen internal controls;
- To evaluate the organizational risk for fraud, waste, and abuse, and pursue fraud, waste, and abuse investigations;
- To assess the effectiveness of the control environment, its processes and procedures that mitigate the occurrence of fraud, waste, and abuse on an ongoing and continuous basis;
- To make recommendations to program staff for improvement of key areas that expose a risk for fraud, waste, and abuse;
- To maintain a professional, conducive environment with an open line of communication with the Grantee and GHURA's executive director to facilitate the reporting of any and all fraudulent activities, behaviors, actions, or areas that present a risk of fraud, waste, and abuse involving program staff; and
- To investigate fraud, waste, and abuse involving the Grant Manager and/or program staff, report investigative findings and make recommendations to the Grantee and GHURA's Executive Director, and to refer cases for further investigation and action when appropriate.

**Program Staff:** Conducts Quality Assurance/Quality Control (QA/QC) throughout their processes, monitoring for FWA. Program Staff are required to report any suspected fraud, participate in training on fraud prevention, and comply with CDBG-DR FWA policy and procedures.

## 5.0 Trainings, Information, Identification, and Prevention

**5.1 Training:** All grantees receiving CDBG-DR funds for the first time shall attend and require subrecipients to attend fraud related training to assist in the proper management of CDBG-DR funds, and provide information to beneficiaries about possible fraudulent activities and how to avoid them.

**5.2 Accuracy of Information:** All grantees receiving CDBG-DR funds shall be held responsible to verify the accuracy of information provided by applicants. The CDBG-DR program shall outline a process that establishes a criterion to be used when evaluating the capacity of potential subrecipients.

**5.3 Identification:** GHURA commitment is to preserve and safeguard the public trust and adopt and promote systematic ethical organizational behavior by providing clear and compelling guidelines and assigning responsibility for the development of adequate controls and impartial conduct of investigations.

**5.4 Prevention:** To prevent cases of fraud, waste, and abuse, the following actions shall be followed, to ensure enforcement of this policy.

**5.5 Program execution:** The GHURA CDBG-DR program, contractors, developers, and/or subrecipients who receive CDBG-DR funds must establish a process or adopt GHURA CDBG-DR FWA Policy, to address fraud, waste, and abuse.

**5.6 Program oversight:** Program staff shall be engaged in an ongoing process to monitor, inspect, audit, and assess the progress and quality of projects to ensure recipients of CDBG-DR funds meet the required standards, guidelines, and statutory obligations.

**5.7 Beneficiary Eligibility Verification:** Conduct thorough eligibility verification processes for all applicants, including background checks and income assessments.

**5.8 Public Awareness:** Inform the public about fraud, waste, and abuse, and provide clear communication on the consequences of fraudulent activities.

## 6.0 Monitoring & Reporting

### 6.1 Monitoring.

All recipients of CDBG-DR resources shall establish provisions for monitoring and compliance with achievement of program/performance goals, prevention, and correction of deficiencies, and compliance with federal, state, and local regulations.

The CDBG-DR program shall define in its SOPs, the frequency of monitoring other entities that will administer CDBG-DR funds, how it will monitor subrecipients, contractors, and other program participants, and why monitoring is to be conducted.

## **6.2 Whistleblower Protection**

All employees of the agency and subrecipients are obligated to protect whistleblowers and shall observe all applicable laws and regulations including but not limited to 41 USC 4712 and Chapter 37 of Title 5 of the Guam Code Annotated. Whistleblower protection refers to the legal safeguards provided to individuals who report misconduct, illegal activities, or violations within organizations—whether in government, corporate, or nonprofit sectors. These protections are designed to shield whistleblowers from retaliation, such as termination, harassment, or demotion, and to encourage transparency and accountability. In essence, whistleblower protection aims to empower people to speak out against wrongdoing without fear of personal or professional harm, reinforcing ethical standards and public trust.

## **6.3 Reporting**

Any person, including any employee of the CDBG-DR Program, who suspects, witnessed, or discovered any fraud, waste, or abuse, relating to the CDBG-DR Program, should report it immediately by any of the means listed below. It is possible that a citizen may disclose acts of fraud, waste, or abuse of CDBG-DR funds to any CDBG-DR Program staff (e.g., at intake centers, program office, events, etc.). Therefore, any information received must be treated with extreme confidentiality and must be shared with the Guam CDBG-DR Internal Auditor or GHURA's CDBG-DR's established procedure. The CDBG-DR's ultimate goal is to establish that all information disclosed to any employee will not be rejected.

- a. Internal Reporting** Any employee who has knowledge of or who has good reason to suspect that fraud, waste, or abuse has occurred shall adhere to the policies outlined below.
  - i. When suspected fraudulent activity, waste, or abuse is observed by, or made known to an employee, the employee shall immediately report the activity to the Lead Compliance Official/Grant Manager or designee.
  - ii. An employee shall not destroy, or allow to be destroyed, any document or record of any kind that the employee knows may be relevant to a past, present, or future investigation. An employee must be able to provide adequate information to support an investigation. Mere speculation does not suffice. The report must be made in good faith. An employee who knowingly makes a false or bad faith complaint will be subject to disciplinary and/or legal action.
  - iii. Alternative prompt reporting of fraudulent activity, waste, or abuse may be done via the CDBG-DR Division Fraud email or Hotline and the HUD Office of Inspector General (OIG).

- b. External Reporting** GHURA's CDBG-DR cannot compel citizens and customers (non-employees) to report suspected instances of fraud, waste, or abuse, however, GHURA's CDBG-DR strongly encourages them to do so by:

- Calling the GHURA CDBG-DR Fraud Hotline at 671-300-CDBG (2324);
- Emailing [fwa-dr@ghura.org](mailto:fwa-dr@ghura.org);
- Submitting the complaint form available online at [www.guamcdbgdr.org](http://www.guamcdbgdr.org); and/or
- Contacting the HUD OIG at 1-800-347-3735 or via email at [HOTLINE@hudoig.gov](mailto:HOTLINE@hudoig.gov).

**c. Report Handling**

i. FWA reports involving programs, contractors, awardees, beneficiaries, or subrecipients will be verified by the Grant Manager or Lead Compliance Official, and addressed programmatically or referred to the appropriate authority.

ii. FWA reports involving any program staff, inclusive of the Grant Manager, shall be routed directly and expeditiously to the Internal Auditor for verification and action.

## **6.4 Verifications**

Upon receiving allegations or indications of FWA, program staff or the Internal Auditor shall initiate a structured review process to determine the credibility, scope, and severity of the issue.

- Data from different documents shall be cross-verified to ensure consistency across each program.
- After gathering information and conducting an investigation, the GHURA Lead Compliance Official, Grant Manager or the Internal Auditor shall document his/her findings, make recommendations, take corrective actions, or make referrals to an appropriate authority.

## **6.5 Agency Decision**

The decision on how to handle suspected FWA shall be guided by the following principles:

- Escalation and Referral:
  - If preliminary or internal audit findings indicate possible criminal conduct, gross mismanagement, or significant financial loss, the matter will be referred to the HUD Office of Inspector General (OIG) or appropriate law enforcement agency. All referrals will be documented, and all employees shall fully cooperate with external investigations.
- Corrective Action and Recovery:
  - Based on investigative outcomes, the GHURA may implement corrective actions including disciplinary measures, recovery of disallowed costs, suspension or termination of contracts or subawards, and changes to policies or procedures to prevent recurrence.
- Termination of Program/Contract/Agreement.



## 6.6 Notification of Agency Decision

Upon conclusion of the structured review process and determination, the sub-recipient, contractor, applicant, or other, will receive written notification of the Final Agency Decision. The notice shall include:

- The specific reasons for the decision;
- Information on their right to appeal and how to appeal of the decision; and
- A contact person or office for questions or further clarification.

**a. Administrative Action:** If fraud is confirmed, take appropriate administrative actions, including the conversion of grants to loans, specifically CDBG-DR, possibility of terminating housing assistance and demanding repayment of funds.

**b. Referral to Authorities:** If applicable, refer the case to law enforcement or other appropriate authorities for criminal prosecution.

## 7.0 Conclusion

By adhering to this Fraud, Waste, and Abuse Policy, GHURA CDBG-DR aims to uphold the highest standards of integrity and accountability in all of its operations. All staff and stakeholders are expected to fully support the prevention and identification of fraudulent activities, thereby ensuring the responsible use of public resources.

## 8.0 Contact Information

Guam Housing and Urban Renewal Authority (GHURA) Community Development Block Grant Disaster Recovery (CDBG-DR)	GHURA Main Office 117 Bien Venida Ave. Sinajana, Guam 96910
	fwa-dr@ghura.org
	671-300-CDBG (2324)
	<a href="http://www.guamcdbgdr.org">http://www.guamcdbgdr.org</a>
US Department of Housing & Urban Development (HUD) Office of Inspector General (OIG)	HUD OIG Hotline 451 7 <sup>th</sup> Street SW Washington, D.C. 20410
	<a href="mailto:HOTLINE@hudoig.gov">HOTLINE@hudoig.gov</a>
	1-800-347-3735
	<a href="https://www.hudoig.gov/hotline/">https://www.hudoig.gov/hotline/</a>

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-028**

**Moved by:** \_\_\_\_\_

**Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “WEBSITE MAINTENANCE AND MANAGEMENT POLICY” FOR THE GUAM COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b), requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant-Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.c of the Universal Notice (90 FR 4759), GHURA is required to have adequate policies and procedures to maintain a comprehensive and accessible disaster recovery website; now, therefore be it,

**RESOLVED,** that the Board approves the program specific “Website Maintenance and Management Policy” appended herewith, and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager, shall promulgate and have published subsequent procedures derived from this policy

**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025  
PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true  
and correct copy of a Resolution duly  
adopted by the Guam Housing and  
Urban Renewal Authority Board of  
Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**



## **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

### **Website Maintenance and Management Policy**

**Aug 14, 2025**

The policy stated herein is current as of August 14, 2025. This policy outlines the Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) guidelines for the program's website. This policy will serve as a central reference point for understanding operations, ensure consistency, and clarity on the general guidance on the maintenance and management pertaining to the CDBG-DR Program website. This policy will be reviewed periodically and updated as necessary. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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## 1.0 Approval of Amendment History

Version	Date	Amendment Reference
Version 1.0	8/26/2025	Initial

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**Amended By:**

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Fernando B. Esteves  
Grant Manager

**Approved By:**

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Elizabeth F. Napoli  
Executive Director

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Certifying Date



## 2.0 Purpose

This Policy is provided as a general guide for designing, upgrading, and uploading content on the Guam Housing and Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) website.

2.1 The CDBG-DR Website Management Team consist of the:

- Grant Manager;
- Webmaster;
- CDBG-DR Chief Planner; and
- CDBG-DR Public Information Officer.

2.2 All requests relating to uploading, removing, or updating the CDBG-DR website must be sent to the CDBG-DR email address: [fixinsix@ghura.org](mailto:fixinsix@ghura.org).

## 3.0 Roles and Responsibilities

Roles	Responsibilities	Details
Grant Manager	<ul style="list-style-type: none"><li>• CDBG-DR website content review and approval.</li></ul>	<ul style="list-style-type: none"><li>• Reviews and approves content, as needed.</li></ul>
Webmaster (GHURA MIS Designated Staff)	<ul style="list-style-type: none"><li>• Design and manage CDBG-DR website.</li><li>• Provide technical support.</li><li>• Address internal web server issues.</li><li>• Create and modify program related CDBG-DR web pages.</li></ul>	<ul style="list-style-type: none"><li>• Sets standards and operations.</li><li>• Ensures conformance to directives.</li><li>• Responsible for posting and uploading of contents.</li><li>• Maintains content updates.</li><li>• Manages links.</li><li>• Manages and oversees IT Help Desk.</li></ul>
CDBG-DR Public Information Officer, CDBG-DR Chief Planner	<ul style="list-style-type: none"><li>• Gathers approved CDBG-DR website contents and transmits them to Webmaster.</li><li>• Coordinates CDBG-DR website layout.</li></ul>	<ul style="list-style-type: none"><li>• Receives division updates and other information that will be uploaded onto the CDBG-DR website and presents them to Grant Manager for review and approval.</li></ul>

<b>Roles</b>	<b>Responsibilities</b>	<b>Details</b>
	<ul style="list-style-type: none"> <li>• Directs and coordinates Troubleshooting with IT.</li> </ul>	<ul style="list-style-type: none"> <li>• Transmits approved contents to Webmaster for posting/uploading to CDBG-DR website.</li> </ul>
CDBG-DR Public Information Officer	<ul style="list-style-type: none"> <li>• Content creation.</li> <li>• Periodic review of program-related content.</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible for providing accurate up- to-date content covering respective sections/divisions.</li> <li>• Graphic creation/artwork integration.</li> </ul>

## 4.0 Requirements

The following Guam CDBG-DR website shall be updated quarterly unless otherwise specified herein:

- 4.0.1 CDBG-DR Action Plan and Action Plan Substantial and Non-Substantial Amendments.
  - 4.1.1 Substantial Amendments must be prominently posted for public comment for no less than 30-days. Non-Substantial Amendments do not require public comment and will be posted on the CDBG-DR website five (5)-business days prior to its effective date.
  - 4.1.2 Once HUD approves the Action Plan (and any subsequent amendments), the Action Plan (and such subsequent amendments) must be posted within three (3)-calendar days on the CDBG-DR website.
  - 4.1.3 Approved Action Plan and Substantial/Non-Substantial Action Plan Amendments must be posted/uploaded to the CDBG-DR website in reverse chronological order (most recent first).
  - 4.1.4 Such Approved Amendments must be updated in the Disaster Recovery Grant Reporting (DRGR) system Action Plan. Once the DRGR Action Plan is approved, the CDBG-DR Chief Planner is responsible for submitting the approved DRGR Action Plan to the Webmaster (MIS Designated Staff) Team for uploading to the CDBG-DR Website.
  - 4.1.5 All material must be ADA compliant. This compliance will be administered by the delegated program staff under the direction of the CDBG-DR Grant Manager.

## 4.1 Reports

- 4.1.1 Quarterly Performance Reports (QPRs): The CDBG-DR Planning Division will be responsible for submitting the QPRs in DRGR. After submitting in DRGR, the

designated staff will download the QPR as a PDF and submitted to the Webmaster (MIS) Team for uploading to the CDBG-DR Website.

- 4.1.2 QPR must be posted to the CDBG-DR website within three (3)-calendar days after submitting the QPR in the DRGR.
- 4.1.3 QPRs must be posted to the CDBG-DR website in reverse chronological order (most recent first).
- 4.1.4 QPRs must continue to be posted until all funds have been expended and all expenditures/activities have been reported.

#### **4.2 Program Operational Policies**

- 4.2.1 All CDBG-DR policies shall be posted on the CDBG-DR website under the “Policies and Procedures” tab.
- 4.2.2 Policies will be updated as necessary and posted to the CDBG-DR website.
- 4.2.3 Policies will be reviewed annually for assurances and quality checks, in line with the program’s annual start date.
- 4.2.4 CDBG-DR Chief Planner will provide an up-to-date list of CDBG-DR policies.

#### **4.3 Procurement**

- 4.3.1 GHURA procurement policy shall be posted on the CDBG-DR website under the “Procurement” tab.
- 4.3.2 All CDBG-DR Request for Proposals (RFPs), Request for Quotes (RFQs), Invitation for Bid (IFBs), contracts, change orders, and amendments to those documents must be posted on the CDBG-DR website under the Procurement tab.
- 4.3.3 Contracts not exceeding the Micro-Purchase thresholds and any amendments thereto must be posted quarterly following the full execution of these legal instruments.

#### **4.4 Points of Contact**

- 4.4.1 The “Contact Us” section is found at the bottom of each CDBG-DR web page.
- 4.4.2 This section will also indicate the main GHURA Office address and GHURA’s CDBG-DR Office on Guam and the contact information for each office.

#### **4.5 Citizen Participation Plan (CPP)**

- 4.5.1 CPP must be posted on the CDBG-DR website and updated as necessary.
- 4.5.2 CPP Plan will be reviewed annually for assurances and quality checks, in line with the program’s annual start date.

### **5.0 Public Comments**

The following will be posted to the CDBG-DR website to facilitate receiving public comments:

- 5.0.1 An email address specifically for the purpose of receiving public comments for CDBG-DR: [fixinsix@ghura.org](mailto:fixinsix@ghura.org).
- 5.0.2 Mailing address for the GHURA CDBG-DR at GHURA Attn: CDBG-DR; 117 Bien Venida Ave.; Sinajana, Guam 96910.
- 5.0.3 The CDBG-DR website will clearly identify individuals serving as the primary contact for all public comment related communications: GHURA Grant Manager / Public Information Officer.

## 6.0 Updates and Maintenance

Unless otherwise explicitly stated herein, updates to the website shall be made no more than quarterly.

## 7.0 Content Creation and Uploading

- 7.1 CDBG-DR Grant Manager, Chief Planner, and Public Information Officer are responsible for drafting and monitoring content for their respective CDBG-DR web pages on a quarterly basis.
- 7.2. All content must be approved by the Grant Manager or Designee prior to content upload to the CDBG-DR website.
- 7.3 The CDBG-DR Public Information Officer will transmit approved content to Webmaster for posting/uploading.

## 8.0 Conclusion

By adhering to this Website Maintenance and Management Policy, GHURA CDBG-DR aims to comply with the Universal Notice and federal guidelines.

## 9.0 Contact Information

<b>Guam Housing Renewal Authority (GHURA)</b> <b>Community Development Block Grant Disaster Recovery (CDBG-DR)</b>	GHURA Main Office, 117 Bien Venida Ave. Sinajana, Guam 96910
	<a href="mailto:fixinsix@ghura.org">fixinsix@ghura.org</a>
	671-477-9851
	<a href="http://www.guamcdbgdr.org">http://www.guamcdbgdr.org</a>

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-029**

**Moved by:** \_\_\_\_\_

**Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “DUPLICATION OF BENEFITS POLICY” FOR THE  
GUAM COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b) requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.e of the Universal Notice (90 FR 4759), GHURA is required to have adequate policies and procedures to prevent the duplication of benefits; now, therefore be it,

**RESOLVED,** that the Board approves the program specific “Duplication of Benefits Policy” appended herewith and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager, shall promulgate and have published subsequent procedures derived from this policy.

**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025**

**PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true and correct copy of a Resolution duly adopted by the Guam Housing and Urban Renewal Authority Board of Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**





# **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

## **DUPLICATION OF BENEFITS POLICY**

**Aug 14, 2025**

This policy stated herein is current as of August 14, 2025. The policy represents the current version of the Guam Housing and Renewal Authority's (GHURA) CDBG-DR Duplication of Benefits Policy providing general guidance for the program. This Policy will be reviewed periodically and updated as necessary. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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## 1.0 Approval of Amendment History

Version	Date	Amendment Reference
Version 1.0	8/26/2025	Initial

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**Amended By:**

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Fernando B. Esteves  
Grant Manager

**Approved By:**

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Elizabeth F. Napoli  
Executive Director

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Certifying Date

## 2.0 Overview

The Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) is responsible for administering the Community Development Block Grant-Disaster Recovery (CDBG-DR) funds allocated to Guam for long-term recovery efforts. These funds are subject to the requirements of the appropriations act and the “Universal Notice”.

Under Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5155), federal agencies are required to ensure that disaster recovery assistance does not duplicate benefits already received from other sources, such as insurance or other federal aid. This requirement, known as the Duplication of Benefits (DOB) prohibition, helps ensure that federal assistance is used to supplement, not replace, other disaster recovery resources (42 U.S.C. 5170). The GHURA is prohibited from making a blanket determination that CDBG-DR assistance under one of its programs or activities does not duplicate another category or source of assistance.

A DOB occurs when a person, household, business, or other entity receives disaster assistance from multiple sources for the same purpose, and the total amount received for that purpose is more than the total need. Common disaster assistance sources include, but are not limited to:

- FEMA;
- SBA;
- NFIP;
- HUD;
- Central Office for Recovery, Reconstruction and Resiliency (COR3);
- Increased Cost of Compliance (ICC);
- United States Army Corps of Engineers (USACE);
- Private insurance;
- Private and nonprofit disaster assistance;
- Other public or private source; and
- Legal settlement(s).

Applicants must provide supporting documents, such as bank statements, award, or denial letters, to substantiate the amount, source, and use of any disaster recovery or mitigation funds received or were denied for the project.

If the applicant’s costs for the activity will be reimbursed by Federal Emergency Management Agency (FEMA) or another source of funding, the GHURA CDBG-DR or its subrecipients cannot provide the CDBG-DR assistance for those costs. If FEMA or other federal funds later cover the same costs paid by CDBG-DR, any duplicative CDBG-DR assistance must be repaid. Assistance can be provided when a survivor’s insurance or other resources only cover part of their disaster-related need. In those cases, federal aid used to fill the gap is not considered a duplication (42 U.S.C. 5155(b)(3)).

Subrecipients, contractors, subcontractors, and partners must incorporate this policy into the design, administration, and related agreements for all CDBG-DR projects. A DOB analysis must be completed for every applicant before awarding CDBG-DR funds.

### 3.0 Supplanting of Funds

The CDBG-DR funds are intended to be the funding of last resort for eligible recovery activities. The GHURA CDBG-DR, its subrecipients, and individual beneficiaries shall not use CDBG-DR funds to supplant other funds allocated by State or local governments, designated for the same eligible activities.

The GHURA CDBG-DR will verify that CDBG-DR funds are not used for activities reimbursable by or for which funds are made available by Insurance, FEMA, U.S. Army Corps of Engineers, or other federal funds. To avoid duplication, if FEMA or other programs are accepting applications for a project that is being considered for CDBG-DR funding, the GHURA CDBG-DR will seek assistance from those sources before using CDBG-DR. Applicants must file an insurance claim if one has not yet been submitted, as part of the DOB review. The GHURA CDBG-DR will establish, if it has not already done so, formal data-sharing agreements with FEMA, the Small Business Administration (SBA), insurers, and other sources of local, state, and federal sources of funding to support timely and accurate DOB verification.

The GHURA CDBG-DR, its subrecipients, contractors, subcontractors, and partners will maintain program policies and procedures that describe the types of DOB that may arise and how each source of assistance will be verified. For example, applicants for public infrastructure projects must submit documentation of any FEMA Public Assistance (PA) funds received. The GHURA CDBG-DR will then verify this information using data obtained through its agreement with FEMA. At any point during project implementation, the GHURA CDBG-DR may request subrecipients to submit their DOB-related procedures and supporting documentation.

### 4.0 Calculation of Award and Identification of DOB

The total DOB amount is calculated by subtracting the exclusions from the applicant's total assistance. The DOB calculation framework consists of five main steps:

- Assessing an applicant's total need;
- Identifying total assistance available to the applicant;
- Excluding non-duplicative amounts of financial assistance;
- Identifying the DOB amount; and
- Calculating the total CDBG-DR award.

Several considerations that may change the maximum CDBG-DR award:

- The GHURA CDBG-DR is required to impose an award cap that limits the amount of assistance an applicant is eligible to receive; this may reduce the potential CDBG-DR assistance available to the applicant.

- The GHURA CDBG-DR may increase the amount of an award if the applicant agrees to repay duplicative assistance it receives in the future (unless prohibited by a statutory order of assistance, as in the requirement to use FEMA or USACE assistance).
- The applicant's CDBG-DR award may increase if a reassessment shows that the applicant has additional unmet need.

The GHURA CDBG-DR will incorporate HUD's **Duplication of Benefits Analysis Worksheet** into the eligibility review process for all CDBG-DR applicants. Reference Appendix A for more details on the procedure for calculating CDBG-DR awards and identification of DOB.

## 5.0 Types of Duplicative Funds

The GHURA CDBG-DR will follow HUD's definitions provided in the worksheet when conducting a DOB analysis. Types of assistance and key concepts to consider during a DOB analysis including:

- Funds provided for different purpose than the CDBG-DR assistance;
- Funds provided for the same purpose but a different allowable use;
- Purpose of the assistance;
- Insurance;
- FEMA funds;
- Order of assistance;
- Cost principles;
- Total need;
- Unmet need;
- Private loan;
- Subsidized loan;
- Declined loan;
- Cancelled loan; and/or
- Legal Settlement(s).

## 6.0 Exceptions

### 6.1 Payments Under the Uniform Relocation Act (URA)

The URA ensures fair and equitable treatment for individuals and businesses displaced as a result of federally funded projects, including those supported by CDBG-DR. A person who has been displaced is allowed to receive rental assistance under the URA, as implemented at 49 CFR Part 24. Relocation payments made under the URA and under CDBG's optional relocation assistance provisions at 24 CFR 570.606(d) must comply with DOB requirements, including those outlined in 90 FR 1754 and under the URA. These rules prevent duplicate payments for the same need. To comply with CDBG-DR DOB requirements, the GHURA CDBG-DR must complete a DOB analysis before issuing rental assistance under the URA, as applicable to its programs.



**Note:** Although CDBG-DR funds cannot duplicate other financial assistance for the same purpose, non-financial services, such as advisory assistance and required notices under the Uniform Relocation Act, are not subject to duplication of benefits analysis. These services must still be provided as required by the URA.

## 6.2 Multiple Disasters

When more than one disaster occurs in the same area and an applicant has not fully recovered from the first disaster before the second one hits, there is a risk that assistance from the second disaster could duplicate earlier aid for the same need. HUD recognizes that DOB reviews in these cases can be complicated. For example, damage from the second disaster might destroy work already completed with earlier assistance, or even destroy receipts and documents showing how that assistance was used.

According to HUD's Universal Notice (90 FR 1754), the GHURA CDBG-DR is adopting the following policy for situations where two disasters affect the same location before the applicant has recovered from the first:

Applicants do not have to maintain documentation of how they used public disaster funds (from federal, state, or local agencies) beyond the time period required by the agency that provided the funds.

If applicants no longer have that documentation, the GHURA CDBG-DR may accept a self-certification describing how the funds were used.

This is allowed only if:

The applicant is notified of the civil and criminal penalties for false claims and fraud, and the GHURA CDBG-DR determines that the applicant's stated needs are consistent with available data about the nature and extent of damage caused by the disasters (e.g., burn severity maps or damage assessment reports).

For example, if a second disaster occurs three years after a previous one, and the earlier agency only required documentation to be kept for two years, the GHURA CDBG-DR will allow self-certification. Likewise, if records were destroyed by the second disaster, we may also accept a self-certification.

## 7.0 Subrecipient Compliance

The GHURA CDBG-DR will be responsible for ensuring compliance by subcontractors and subrecipients. All applications for federal pass-through funding must show how the project meets a community need and helps prevent, prepare for, or respond to the disaster.

Documentation submitted with an application will be reviewed utilizing the **Duplication of Benefits Analysis Worksheet** by the GHURA CDBG-DR staff or contractors as part of the threshold requirements of the funding process. If it is determined that a duplication of benefits exists and there is no remaining unmet need, the application will not be recommended for approval. If there is a DOB and additional unmet needs, or no DOB at the time of application, the application may be recommended for potential funding.

A second DOB review will be completed by the GHURA CDBG-DR before finalizing the subrecipient agreement. During the agreement drafting process, the GHURA CDBG-DR will update the **Duplication of Benefits Analysis Worksheet** to reflect the most current information for each conditionally selected subrecipient. Subrecipients are not required to complete the worksheet themselves but must provide any necessary documentation requested by the GHURA CDBG-DR to support the review.

Staff will review the forms, use the most recent available data from FEMA, the SBA, insurers, and any other sources of local, state, and federal funding to ensure that there is a continued unmet need, and no duplication has occurred. No agreement shall be executed if, since the date of application, a subrecipient has received funds from another source for the same need as requested during the application process. If funds from another source do not fully cover the unmet need, the GHURA CDBG-DR may adjust the award amount to avoid providing more assistance than necessary and to ensure there is no duplication of benefits.

All agreements with subrecipients, contractors or beneficiaries will include the following statement:

*“Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18 USC 2, 287, 1001 and 31 USC 3729.”*

All applicants shall be required to sign, at the time of application, an affidavit as follows:

*"I/We agree to notify the GHURA, within five (5) days of any additional or new payments, loans, grants, or awards by HUD, FEMA, the Small Business Administration, the state, or any other entity I/we have not specifically disclosed in this application. Further, I/we understand and acknowledge the County OOR or its subrecipient's right and responsibility to enforce this requirement by recapturing all or a portion of the CDBG-DR award if the funds I/we receive are determined to be a duplication of the CDBG-DR benefit I/we are applying for with this application.*

*"PENALTY FOR FALSE OR FRAUDULENT STATEMENT: USC Title 18, Sec 1001, provides: Whoever, in any matter, within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, makes any false, fictitious, or fraudulent statement or representation, or makes or uses any false writing or document knowing the same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than five (5) years, or both.*

*I/We have read and understand the foregoing statement.*

**SIGNATURE:**

**DATE:**

## 7.1 Determining Subrecipient Compliance

The monitoring period and thresholds for DOB repayment agreements will be based on the assessed risk level, primarily determined by the amount of CDBG-DR assistance awarded. When both award size and affordability requirements apply, the GHURA CDBG-DR will enforce the more restrictive standard.

### 7.1.1 Monitoring Thresholds

- Awards of \$25,000 or more:  
Subject to annual monitoring for up to three years from the date of final disbursement, or for the duration of the required affordability period, whichever is more stringent.
- Awards between \$5,000 and \$24,999:  
Will be reviewed and recertified at least once within two years of disbursement, or in accordance with the affordability period, if applicable.
- Awards under \$5,000:  
Not subject to ongoing monitoring unless specific risks are identified. These awards will be reviewed at closeout.

The GHURA CDBG-DR reserves the right to conduct additional reviews at any time if new information indicates potential DOB risk.

### 7.1.2 Affordability Period Compliance

For housing activities with affordability requirements, the GHURA CDBG-DR will ensure compliance with the terms outlined in the Action Plan, HUD regulations. If a beneficiary fails to meet affordability conditions, recapture or repayment provisions may be triggered in accordance with this policy.

### 7.1.3 Subrogation and Recapture of Funds

All applicants and subrecipients must report any duplicative assistance they receive whether before or after accepting a CDBG-DR award. Any duplicative funds must be reported to the GHURA CDBG-DR and may need to be repaid. All applicants and subrecipients are required to sign a Subrogation Agreement, committing to repay duplicative assistance if needed. If additional assistance is reported, the GHURA CDBG-DR will evaluate the funding to determine whether it must be used first for the same recovery purpose as the CDBG-DR award (to prevent duplication of benefits), or whether it must be repaid to the GHURA CDBG-DR as reimbursement for previously disbursed CDBG-DR funds.

If it is found that an applicant or subrecipient received more assistance than they were eligible for, the GHURA CDBG-DR or its project team may require full or partial repayment. All programs are responsible for:

- Recovering duplicative funds from applicants or non-compliant participants.
- Reviewing and reconciling applicant files to ensure compliance with DOB rules and federal requirements.

If a duplication of benefits or overpayment is identified, the applicant will be issued a written notice outlining the reason for the recapture and the total amount to be repaid. Applicants may appeal the overpayment notification through the designated appeals process detailed in the applicable programs' policy and procedures.

If the applicant does not submit an appeal within the specified timeframe, or if the appeal is denied, the program will proceed with recovery of the overpaid amount. Should the appeal result in a revised award or eligibility determination, the applicant will be required to sign an updated grant agreement reflecting the adjusted repayment amount. Repayments must be made in full, as a lump sum.

However, if the applicant demonstrates financial hardship, the program may consider limited accommodations on a case-by-case basis.

All funds recovered will be recorded in the Disaster Recovery Grant Reporting (DRGR) system and returned to the CDBG-DR account or the U.S. Treasury if the grant has been closed out.

Under CDBG-DR Policy Bulletin 2025-01, the program will not pursue repayment of duplicative assistance in the following circumstances:

- The beneficiary is later determined to be deceased;

- The property is subject to foreclosure;
- The beneficiary has filed for bankruptcy; or
- The beneficiary is low- to moderate-income (LMI) and later receives federal assistance for the same purpose, which—if it had been received earlier—would have reduced the amount of the CDBG-DR or CDBG-MIT award. In such cases, repayment is not in the best interest of the federal government, and HUD policy exempts the first \$27,000 of this duplicative federal assistance from collection.

This LMI exemption applies only to duplicative federal assistance received after the CDBG-DR or CDBG-MIT award. It does not apply to:

- Non-federal sources of duplicative aid (e.g., state, local, or private assistance), which must be handled through the GHURA CDBG-DR’s standard DOB collection process; or Fraud, false claims, or misrepresentation by the beneficiary or any party with an interest in the claim.

**Note:** This policy also allows grantees to forgo collection of small amounts of duplicative assistance when the administrative cost of recovery would exceed the amount owed. Additionally, these exceptions do not apply in cases where the duplication of benefits results from contractor fraud. Those cases must be handled separately in accordance with program fraud prevention and recovery procedures.

## 8.0 Duplication of Benefits Worksheets

GHURA CDBG-DR will use DOB worksheets indicated in program specific standard operating procedures.

## 9.0 Conclusion

By adhering to this Duplication of Benefits Policy, GHURA CDBG-DR aims to comply with the Stafford Act, the “Universal Notice” and federal guidelines.

## 10.0 Contact Information

<b>Guam Housing Renewal Authority (GHURA) Community Development Block Grant Disaster Recovery (CDBG-DR)</b>	GHURA Main Office, 117 Bien Venida Ave. Sinajana, Guam 96910
	fixinsix@ghura.org
	671-477-9851
	<a href="http://www.guamcdbgdr.org">http://www.guamcdbgdr.org</a>

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-030**

**Moved by:** \_\_\_\_\_

**Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “TIMELY EXPENDITURE OF GRANT FUNDS POLICY” FOR THE GUAM COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b) requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.f of the Universal Notice (90 FR 4759), GHURA is required to have adequate policies and procedures to determine timely expenditures; now, therefore be it,

**RESOLVED,** that the Board approves the program specific “Timely Expenditures of Grant Funds Policy” appended herewith, and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager shall promulgate and have published subsequent procedures derived from this policy.



**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025  
PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true  
and correct copy of a Resolution duly  
adopted by the Guam Housing and  
Urban Renewal Authority Board of  
Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**



# **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

## **TIMELY EXPENDITURES OF GRANT FUNDS POLICY**

**Aug 14, 2025**

The policy stated herein is current as of August 14, 2025. This policy represents the Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) policy guiding the timely expenditure of grant funds. All policies will be reviewed periodically and updated. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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## 1.0 Approval of Amendment History

Version	Date	Amendment Reference
Version 1.0	8/26/2025	Initial

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**Amended By:**

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Fernando B. Esteves  
Grant Manager

**Approved By:**

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Elizabeth F. Napoli  
Executive Director

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Certifying Date

## 2.0 Purpose

The purpose of this Timely Expenditures of Grant Funds Policy is to establish guidelines for the management, projection, tracking, and documenting of expenditures, and reprogramming of funds within the Guam Housing and Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR).

## 3.0 Scope

This policy applies to all employees, contractors, and subrecipients of GHURA CDBG-DR.

## 4.0 Overview

The GHURA is the lead agency responsible for administering the CDBG-DR funds allocated to Guam for long-term recovery activities. These funds are subject to the requirements of the appropriations act, the Allocation Announcement Notice (90 FR 4759), and the Federal Register / Vol. 90, No. 5 (January 8, 2025), the “Universal Notice”, and subsequent amendments thereto. To ensure expenditure of all CDBG-DR funds within the required six (6)-year period, GHURA CDBG-DR must submit projections regarding the obligation and expenditure of 100% of CDBG-DR funds over the life of the award, as well as the anticipated outcomes associated with program activities. These projections enable GHURA CDBG-DR and the US Department of Housing and Urban Development (HUD) to evaluate progress on program activities and ensure recovery efforts are achieved within predetermined regulated timelines. To achieve these goals, GHURA CDBG-DR has established the following policies to implement strict guidelines for all GHURA CDBG-DR-administered projects and any grant agreements with subrecipients. In addition, GHURA CDBG-DR will provide technical assistance and support to all subrecipients as needed so that quarterly goals are met and funds are expended within all prescribed deadlines.

## 5.0 Policy Guidance

Per the Universal Notice, HUD waives the provisions at 24 CFR 570.494 and 24 CFR 570.902 regarding timely distribution and expenditure of funds and establishes an alternative requirement providing that each grantee must expend 100 percent of its allocation within six (6) years of the date HUD signs the grant agreement. HUD may extend the Period of Performance (POP) administratively if good cause for such an extension is provided by the grantee and approved by HUD. When the POP has ended, HUD will close out the grant, and any remaining funds not expended by the grantee on appropriate programmatic purposes will be recaptured by HUD.

The POP ending date for the CDBG-DR grant is March 07, 2031. GHURA CDBG-DR and its subrecipients are required to expend funds within their executed contracts, which will not exceed the POP’s ending date.

## 6.0 Management of Procurement Expenditures

For CDBG-DR procurements, the GHURA has adopted Federal procurement processes under II.A.1.B(i)(1) of the Universal Notice, authorized under 5 GCA § 5501 deemed necessary to

comply with requirements under III.F.1 of the Universal Notice. These standards shall be applicable to GHURA CDBG-DR subrecipient. The GHURA preserves its authority under 12 GCA §§ 5105 and 5132(b), and responsibility under 2 CFR 200.318(k), ensuring the timely resolution of any contractual and administrative issues, avoiding unreasonable delays in timely expenditures.

## 7.0 Tracking and Documenting Expenditures

GHURA CDBG-DR's Finance Section will manage the tracking and documentation of expenditures for the CDBG-DR grant in its designated accounting system and will appropriately record in the Disaster Recovery Grant Reporting (DRGR) system.

### 7.1 Projecting Expenditures

GHURA CDBG-DR proposed programs and projects, methods of distribution, and anticipated projections for the timely expenditure of funding to meet the six (6)-year deadline established in the Universal Notice. These projections will be based on each quarter's expected performance, beginning when funds become available to Guam and continuing each quarter until all funds are expended.

Since the exact timing of funding disbursements remains uncertain, the projections will reflect anticipated expenditures based on GHURA CDBG-DR's best estimates. As activity data becomes available, GHURA CDBG-DR will update these projections, ensuring they align with actual performance. The published Action Plan will be amended as needed to accommodate changes, updates, or revisions to project and activity budgets, ensuring the timely expenditure of all funds.

To develop and track these projections, GHURA CDBG-DR will utilize the CDBG-DR Grantee Projections of Expenditures and Outcomes template provided by HUD upon approval of the Action Plan. This approach will allow GHURA CDBG-DR to effectively plan for and manage the expenditure of 100% CDBG-DR funds, even with the uncertainties around the exact funding timeline.

Each Subrecipient Agreement and Funding Agreement will outline benchmarks, draw schedules, and noncompliance processes for the project/activity. When sufficient progress is not being made and the project/activity is more than 90-days behind schedule, GHURA CDBG-DR staff will notify the contractor or subrecipient in writing detailing the lack of progress, possible corrective actions, possible conditions (if necessary), and the date when GHURA CDBG-DR will reevaluate progress. Upon the reevaluation of the progress of the project/activity, if the contractor or subrecipient is unable to complete grant activities in a timely manner, GHURA CDBG-DR reserves the right to reprogram the funds.

In the event of an unanticipated termination of a subrecipient grant agreement, the subrecipient shall remit all program income to GHURA CDBG-DR within 30-days of the termination of the agreement.

## 8.0 Reprogramming of Funds

GHURA CDBG-DR will closely monitor activities to ensure milestones are being achieved and funds are expended accordingly. However, delays may occur, resulting in stalled activities. When a project is delayed for six (6) months, it will be flagged for more direct oversight. If a project is delayed for twelve (12) months, it will be reevaluated for feasibility. A written determination shall be made by the Grant Manager whether the project remains feasible for continued funding or if funds must be reprogrammed based on associated risk to the timely expenditure of funds.

When CDBG-DR funds must be reprogrammed, GHURA CDBG-DR will identify an activity/project from within a pool of previously received and vetted proposals, or a new Notice of Funding Availability (NOFA) will be issued in accordance with Procurement guidelines. Whenever possible, GHURA CDBG-DR will review existing projects for any additional funding gaps or the expansion of the existing scope of services that can be completed within the remaining expenditure timeline. Reprogrammed CDBG-DR funding will be awarded on a first come, first ready, first served basis in accordance with GHURA CDBG-DR implementation plan as outlined within the Action Plan and the remaining expenditure timeline.

## 9.0 Conclusion

By adhering to this Timely Expenditures of Grant Funds Policy, GHURA CDBG-DR aims to comply with the Universal Notice and federal guidelines.

## 10.0 Contact Information

<b>Guam Housing Renewal Authority (GHURA) Community Development Block Grant Disaster Recovery (CDBG-DR)</b>	GHURA Main Office 117 Bien Venida Ave. Sinajana, Guam 969
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	671-477-9851
	<a href="http://www.guamcdbgdr.org">http://www.guamcdbgdr.org</a>



**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-031**

**Moved by:** \_\_\_\_\_

**Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “PROGRAM INCOME POLICY” FOR THE GUAM  
COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b) requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.f.ii of the Universal Notice (90 FR 4759), GHURA is required to properly report, track, and expend program income, ensuring substantial disbursement before making additional withdrawals; now, therefore be it,

**RESOLVED,** that the Board approves the program specific “Program Income Policy” appended herewith and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager, shall promulgate and have published subsequent procedures derived from this policy.

**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025  
PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true  
and correct copy of a Resolution duly  
adopted by the Guam Housing and  
Urban Renewal Authority Board of  
Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**



# **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

## **PROGRAM INCOME POLICY**

**Aug 14, 2025**

The policy stated herein is current as of August 14, 2025. This policy represents the Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) policy guiding the tracking and expenditure of Program Income. All policies will be reviewed periodically and updated. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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## 1.0 Approval of Amendment History

Version	Date	Amendment Reference
Version 1.0	8/26/2025	Initial

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**Amended By:**

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Fernando B. Esteves  
Grant Manager

**Approved By:**

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Elizabeth F. Napoli  
Executive Director

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Certifying Date

## 2.0 Purpose

The purpose of this Program Income Policy is to establish guidelines, responsibilities, and procedures for tracking and reporting within the GHURA CDBG-DR.

## 3.0 Scope

This policy applies to all employees and subrecipients of the GHURA CDBG-DR.

## 4.0 Overview

The GHURA CDBG-DR is responsible for the oversight of the CDBG-DR funds and any Program Income derived from the grant. This document is consistent with federal guidelines and provides further clarity on the use and management of Program Income generated from Guam's CDBG-DR grant.

## 5.0 Definitions

HUD defines CDBG-DR Program Income in the Universal Notice, adapted below.

- A. Program income is defined as gross income generated from the use of CDBG-DR funds (except as provided below under "Exceptions") and received by State or local government grantees, including subrecipients. When program income is generated by an activity that is only partially assisted with CDBG-DR funds, the income shall be prorated to reflect the percentage of CDBG-DR funds used (*e.g.*, a single loan supported by CDBG-DR funds and other funds, or a single parcel of land purchased with CDBG-DR funds and other funds). If CDBG funds are used with CDBG-DR funds on an activity, any income earned on the CDBG portion would not be subject to the waiver and alternative requirement in the Universal Notice. Program income includes, but is not limited to, the following:
  - 1. Proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG-DR funds.
  - 2. Proceeds from the disposition of equipment purchased with CDBG-DR funds.
  - 3. Gross income from the use or rental of real or personal property acquired by State or unit of general local government grantees, including subrecipients, with CDBG-DR funds, less costs incidental to generation of the income.
  - 4. Gross income from the use or rental of real property owned by State or local government grantees, including subrecipients, that was constructed or improved with CDBG-DR funds, less costs incidental to the generation of the income.
  - 5. Payments of principal and interest on loans made using CDBG-DR funds, including interest paid by borrowers on loans made from a revolving fund, if applicable.
  - 6. Proceeds from the sale of loans made with CDBG-DR funds.
  - 7. Proceeds from the sale of obligations secured by loans made with CDBG-DR funds.
  - 8. Interest earned on program income pending disposition of the income, including interest earned on funds held in a revolving fund, if applicable.
  - 9. Interest earned on lump sum drawdowns for financing of property rehabilitation activities as described in 24 CFR 570.513.

10. Funds collected through special assessments made against nonresidential properties and properties owned and occupied by non-LMI households, where the special assessments are used to recover all or part of the CDBG–DR portion of a public improvement.
11. Gross income paid to a State or local government grantee, including subrecipients, from the ownership interest in a for-profit entity in which the income is in return for the provision of CDBG–DR assistance.
12. Any income received by State or local government grantees related to the CDBG–DR grant after closeout, including income received by subrecipients after closeout.

B. Exceptions. Program Income does not include the following:

1. The total amount of funds that is less than \$35,000 received over the life of the grant and retained by State or local government grantees, including subrecipients. Once a grantee, including subrecipients, meets or exceeds the \$35,000 threshold, only funds over the threshold are considered program income and are subject to the requirements of Universal Notice.
2. Amounts generated by activities eligible under section 105(a)(15) of the HCDA (42 U.S.C. 5305(a)(15) and carried out by an entity under the authority of section 105(a)(15) of the HCDA.
3. Income (except for interest described in 24 CFR 570.513) earned on grant advances from the U.S. Treasury; this income must be remitted to HUD for transmittal to the U.S. Treasury.

## 6.0 Policy Guidance

Permission to retain and use Program Income generated from CDBG-DR activities varies depending upon the grantee and the funded activity. The GHURA CDBG-DR shall permit a subrecipient that receives or will receive program income to retain it or shall require them to pay the program income to GHURA CDBG-DR.

A. Use of Program Income

1. Program income that is paid to the GHURA CDBG-DR before or after closeout of the grant that generated the program income, and used to continue disaster recovery activities, is treated as additional disaster recovery CDBG funds subject to the requirements of the Universal Notice and must be used per the GHURA CDBG-DR's Action Plan for Disaster Recovery. To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Treasury are made, unless the GHURA CDBG-DR establishes a revolving loan fund to carry out specific, identified activities.
2. Program income paid to the GHURA CDBG-DR can be used to fund any eligible activities that are in an open obligation round at the time of receiving the program income. Program income is also subject to the general administration cap of 5% per



Universal Notice. Thus, the total of all costs charged to the grant (whether paid out of grant funds or program income) and classified as general administration must be less than or equal to the 5% cap.

**B. Transfer of Program Income**

1. Program income received by the GHURA CDBG-DR before or after closeout, including program income received by subrecipients, shall be transferred by the GHURA CDBG-DR to the annual CDBG program before or after closeout of the grant that generated the program income. In all cases, the GHURA CDBG-DR must first seek and then receive HUD's approval;
2. Any program income transferred will not be subject to the waivers and alternative requirements of the Universal Notice. Rather, those funds will be subject to the applicable regular CDBG program rules. Any other transfer of program income not specifically addressed in the Universal Notice shall be carried out if the GHURA CDBG-DR first seeks and then receives HUD's approval; and
3. The GHURA CDBG-DR must continue to report annually in the Disaster Recovery Grant Reporting (DRGR) system on any program income received following the closeout of the grant.

**C. Revolving Loan Funds**

No Revolving Loan Funds have been established with CDBG-DR grant funds. Funds transferred to annual CDBG appropriations shall be applied to new or existing Revolving Loan Funds and are subject to the Program Income guidelines of the receiving program.

## **7.0 Responsibilities**

The GHURA CDBG-DR is responsible for the overall management of Program Income and ensuring agency policies and practices are consistent with federal guidelines and the Action Plan. The CDBG-DR Grant Manager shall:

- A. Approve the transfer of CDBG-DR program income to the annual CDBG program or specific CDBG activities;
- B. Approve the establishment of a Revolving Loan Fund (if applicable); and/or
- C. Prioritize the use of program income for disaster-related activities using the following criteria:
  1. For activities generating program income with draws anticipated to exceed that Program Income within the next 30-days, the subrecipient will keep the Program Income, and the next draw from the Treasury will be reduced by that amount.
  2. For activities without anticipated draws within the next 30-days, Program Income will be returned to the GHURA CDBG-DR and be credited towards other disaster-related activities using the following precedence:

- i. Credited to another activity within the same program;
- ii. Credited to another activity in a different program managed by the same Agency; or
- iii. Credited to the next activity with a draw large enough to cover the program income as determined by the CDBG-DR Grant Manager and Deputy Controller.

D. Use of Program Income

Program income that is paid to the GHURA CDBG-DR before or after closeout of the grant that generated the program income, and used to continue disaster recovery activities, is treated as additional disaster recovery CDBG funds subject to the requirements of the Universal Notice and must be used per the GHURA CDBG-DR's Action Plan for Disaster Recovery. To the maximum extent feasible, program income shall be used or distributed before additional withdrawals from the U.S. Treasury are made unless the GHURA CDBG-DR establishes a revolving loan fund to carry out specific, identified activities.

## 8.0 Tracking and Reporting

The GHURA CDBG-DR Accounting Division will manage all program income received and returned to the CDBG-DR grant, ensuring it is received in the designated accounting system and appropriately coded in the DRGR system.

The GHURA CDBG-DR will maintain responsibility for receiving reports from their subrecipients in accordance with their grant agreements and policies and procedures. These reports will be included within the request for reimbursements, along with any other documentation as deemed necessary by the GHURA CDBG-DR. Any Program Income generated through CDBG-DR funds that are subsequently transferred to the annual CDBG program will be subject to the policies and procedures of Program Income under the annual appropriation.

## 9.0 Conclusion

By adhering to this Timely Expenditures of Grant Funds Policy, the GHURA CDBG-DR aims to comply with the Universal Notice and federal guidelines.

## 10.0 Contact Information

<b>Guam Housing Renewal Authority (GHURA) Community Development Block Grant Disaster Recovery (CDBG-DR)</b>	GHURA Main Office, 117 Bien Venida Ave. Sinajana, Guam 96910
	fixinsix@ghura.org
	671-477-9851
	<a href="http://www.guamcdbgdr.org">http://www.guamcdbgdr.org</a>

**GUAM HOUSING AND URBAN RENEWAL AUTHORITY  
BOARD OF COMMISSIONERS  
RESOLUTION NO. FY2025-032**

**Moved by:** \_\_\_\_\_

**Seconded by:** \_\_\_\_\_

**RESOLUTION APPROVING THE “CONFLICT OF INTEREST POLICY” FOR THE  
GUAM COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY**

**WHEREAS,** pursuant to 12 GCA § 5104 the Board of Commissioners of the Guam Housing and Urban Renewal Authority (GHURA), is given the right and responsibility to govern and control the operations of the Authority, and to establish policies for its day-to-day operations, and generally to undertake its responsibilities as supreme authority for the Agency; and

**WHEREAS,** 12 GCA § 5105(b) requires that GHURA comply with any Federal rules, requirements, regulations, or procedures and may execute declarations or other agreements or documents of every nature, as may be necessary, or required by the Federal Government and to fully comply with any conditions imposed by the Federal Government upon participation by GHURA in such programs; and

**WHEREAS,** on January 21, 2025, Guam was allocated the Community Development Block Grant Disaster Recovery (CDBG-DR) in the amount of \$500,825,000.00, to aid in the long-term recovery from Typhoon Mawar in May 2023, and the mitigation of future disasters to be administered by GHURA, and

**WHEREAS,** pursuant to II.A.1.d.2 of the Universal Notice (90 FR 4759), GHURA is required to have a written standard of conduct and conflicts of interest policy that complies with 24 CFR 570.611 and 2 CFR 200.318; now, therefore, be it,

**RESOLVED,** that the Board approves the program specific “Conflict of Interest Policy” appended herewith, and shall be effective immediately; and be it further,

**RESOLVED,** that the Executive Director may approve amendments to this policy on behalf of the Board of Commissioners as may be necessary or required, and shall report amendments to the Board of Commissioners when exercising this authority; and be it further,

**RESOLVED,** that the Deputy Director, designated as the Grant Manager, shall promulgate and have published subsequent procedures derived from this policy.

**IN A SCHEDULED BOARD MEETING, SINAJANA, GUAM – AUGUST 26, 2025  
PASSED BY THE FOLLOWING VOTES:**

**AYES:**

**NAYES:**

**ABSENT:**

**ABSTAINED:**

**I certify that the foregoing is a full, true  
and correct copy of a Resolution duly  
adopted by the Guam Housing and  
Urban Renewal Authority Board of  
Commissioners on August 26, 2025.**

**(SEAL)**

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**ELIZABETH F. NAPOLI**

**Board Secretary / Executive Director**



## **Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery**

### **CONFLICT OF INTEREST POLICY**

**Aug 14, 2025**

The policy stated herein is current as of August 14, 2025. This policy represents the Guam Housing and Urban Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR) policy, which provides for the standards of conduct regarding Conflicts of Interest (COI). This policy will be reviewed periodically and updated as necessary. Therefore, users are strongly encouraged to visit our website: [www.guamcdbgdr.org](http://www.guamcdbgdr.org) to access the latest version.

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**Amended By:**

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Fernando B. Esteves  
Grant Manager

**Approved By:**

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Elizabeth F. Napoli  
Executive Director

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Certifying Date



## 2.0 Purpose

The purpose of this COI Policy serves as the Standard of Conduct establishing prohibitions, requirements, and responsibilities within the Guam Housing and Renewal Authority Community Development Block Grant-Disaster Recovery (GHURA CDBG-DR). This policy shall be in congruence with Guam law, 24 CFR 570.611, and 2 CFR 200.318.

## 3.0 Scope

This policy applies to all covered individuals and their immediate family as defined in section 5.0 of this policy and is intended to supplement the Government of Guam Standard of Conduct provided in Chapter 15 of Title 4 of the Guam Code Annotated.

## 4.0 Overview

The GHURA is responsible for the oversight of the CDBG-DR funds and the prevention of conflicts of interest derived from the grant. This policy is consistent with federal guidelines and provides further clarity on the coverage, prohibition, and prevention of conflicts of interest inherent with the administration of Guam's CDBG-DR grant.

## 5.0 Definitions

**Covered Individual:** A covered individual is any person who is an employee, agent, consultant, contractor, officer, or an appointed or elected official of the Government of Guam, or a subrecipient who:

- a. Exercises, has exercised, or is reasonable expected to exercise any function or responsibility with respect to assisted activities; or
- b. Is in a position to participate in a decision-making process; or
- c. Is in a position to gain inside information with regard to such activities.

**Immediate Family:** Immediate family includes (whether by blood, marriage, or adoption) the spouse, spouse by common-law, parent (including stepparent and in-law), child (including stepchild and in-law), brother, sister (including stepbrother, stepsister, brother-in-law, and sister-in-law), grandparent, and grandchild of a covered individual.

## 6.0 Covered Individuals and their Immediate Family

The following list is by no means exhaustive and should be interpreted as giving a wide berth based on the definition provided above:

1. Governor of Guam;
2. Lieutenant Governor of Guam;
3. Delegate to the House of Representatives;
4. Attorney General of Guam;
5. Members of the Guam Legislature;
6. Guam Housing and Urban Renewal Authority Board of Commissioners;
7. Executive Director of the Guam Housing and Urban Renewal Authority;

8. Deputy Director of the Guam Housing and Urban Renewal Authority; and
9. All program staff, agents, or consultants of Guam's CDBG-DR grant and its subrecipients.

## 7.0 General Prohibitions

Unless otherwise approved by HUD, a covered individual is prohibited from obtaining financial interest, benefiting from an activity, or having a financial interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself, or for those whom he or she has immediate family or business ties, during his or her tenure or for one (1) year thereafter.

## 8.0 Roles and Responsibilities

Roles	Responsibilities	Details
Grant Manager	<ul style="list-style-type: none"> <li>Oversight of policy compliance.</li> <li>Reviews and approves submissions.</li> <li>Submits requests for exceptions to HUD.</li> <li>Initiates disciplinary actions for policy violations.</li> </ul>	<ul style="list-style-type: none"> <li>Evaluates processes and procedures.</li> <li>Conducts investigations as necessary.</li> <li>Makes a written determination on whether an exception is supported by published criteria.</li> </ul>
Legal Counsel	<ul style="list-style-type: none"> <li>Reviews requests for exceptions for legality under Guam law.</li> </ul>	<ul style="list-style-type: none"> <li>Prepares a legal opinion to accompany requests submitted for HUD approval.</li> </ul>
Program Staff	<ul style="list-style-type: none"> <li>Reports any potential conflicts, whether real or apparent, to their immediate supervisor when they become aware.</li> </ul>	<ul style="list-style-type: none"> <li>Receives division updates and other information that will be uploaded onto the CDBG-DR website and presents them to the Grant Manager for review and approval.</li> </ul>
Program Managers and Supervisors	<ul style="list-style-type: none"> <li>Refer reported conflicts to the Grant Manager.</li> </ul>	<ul style="list-style-type: none"> <li>Responsible for providing accurate up- to-date content covering respective sections/divisions.</li> </ul>

## 9.0 Exceptions

The GHURA does not have authority to grant exceptions independently. The Grant Manager shall review requests and make a recommendation, but final approval rests with HUD. When reviewing requests for exceptions to conflict-of-interest restrictions, the Grant Manager will apply criteria consistent with HUD guidance.

An exception request may be submitted to HUD only if the Grant Manager determines that it supports the objectives of the CDBG-DR program and contributes to effective and efficient program administration.

The Grant Manager will consider the following factors in making its recommendation:

- Whether the exception would result in substantial cost savings or provide critical expertise that is not otherwise available to the program.
- Whether the affected party was selected through a fair and open competitive process, such as public bidding or solicitation.
- Whether the individual requesting the exception is a member of the intended low- or moderate-income beneficiary group and would receive the same benefits made available to others in that group.
- Whether the covered individual has recused themselves from all duties and decision-making responsibilities related to the specific program activity.
- Whether the financial interest or benefit existed before the individual assumed their current position or role.
- Whether denying the exception would cause significant hardship to the recipient or individual, and whether that hardship outweighs the public interest in avoiding conflicts of interest.
- Any other relevant information or circumstances specific to the request.

The Grant Manager's final review and recommendation to approve with an opinion from the GHURA's Legal Counsel must be thoroughly documented preceding a submission to HUD. All exception decisions will comply with applicable federal regulations, including 24 CFR 570.611 and 2 CFR 200.318, and be retained in the official program record.

## 10.0 Public Notice Requirement

Any request for exception to a conflict of interest shall be publicly disclosed through at least two of the following methods:

1. During a publicly noticed meeting;
2. On the GHURA CDBG-DR website;
3. In a publicly accessible program reports or notices; or
4. Through publication in a local newspaper.

The disclosure must be clearly documented, including a description of how and when it was made, along with supporting materials such as meeting minutes, screenshots, publication dates, or copies of the public notice.

HUD will consider an exception only after the GHURA has provided:

- A disclosure of the nature of the conflict accompanied by supporting documents that there has been public disclosure of the conflict and a description of how the public disclosure was made;
- A recommendation by the Grant Manager that the exception supports the objectives of the CDBG-DR program and contributes to effective and efficient program administration; and
- An opinion of the GHURA's Legal Counsel that the interest for which the exception is sought would not violate Guam law.

This policy does not automatically preclude covered individuals and their immediate family from participating in the program or receiving assistance, as long as all eligibility criteria are met and HUD grants an exception to the conflict-of-interest. Covered individuals shall disclose their relationship with a covered individual at the time of their application. Any exception granted will be documented and maintained according to applicable federal and local regulations.

## 11.0 Awareness and Prevention

All program staff and subrecipients shall be required to submit a conflict-of-interest disclosure. Program staff, subrecipients, and all other covered individuals are required to report situations where a conflict of interest may occur upon being made aware. Reports should be made to an immediate supervisor or the appropriate program manager who will then forward to the Grant Manager for review and action.

Failure to disclose a conflict of interest may result in corrective action which may include, but is not limited to, employee reassignment, contract termination, subrogation, or disciplinary action.

A listing of all program staff and subrecipients shall be made available on GHURA's CDBG-DR website for public inspection. GHURA will undertake a public awareness campaign to ensure the public is informed about covered individuals and procedures.

## 12.0 Addressing Conflicts of Interest

Upon disclosure, a referral will be made to the Grant Manager. If a conflict is determined to exist, the Grant Manager will take appropriate action to address the conflict, which may include:

- Reassignment of duties or responsibilities to avoid any conflict;
- Recusal from decision-making or evaluation processes;
- Termination of involvement in the specific transaction or activity; and/or
- Implementation of other corrective actions as necessary to mitigate any real or perceived conflicts.

For conflicts involving the Grant Manager, the referral shall be made to the GHURA Executive Director and Legal Counsel. All disclosed conflicts of interest, the review process, and any corrective actions taken shall be documented and maintained in accordance with applicable federal and Guam law retention policies. Failure to comply with this conflict-of-interest

statement may result in corrective, disciplinary, or punitive actions. The GHURA will ensure all personnel are informed of this policy and understand its importance in maintaining the integrity of the CDBG-DR program.

### 13.0 Conclusion

By adhering to this Conflict-of-Interest Policy, GHURA CDBG-DR aims to comply with the Universal Notice and federal guidelines.

### 14.0 Contact Information

<b>Guam Housing Renewal Authority (GHURA)</b> <b>Community Development Block Grant Disaster Recovery (CDBG-DR)</b>	GHURA Main Office 117 Bien Venida Ave. Sinajana, Guam 96910
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