

*Compliance Monitoring Plan*

*and Forms*

**State of Colorado – Department of Local Affairs (DOLA)**

**Office of the Executive Director – Disaster Recovery Unit**

CDBG-DR Monitoring Plan and Forms

Version History

|  |  |  |  |
| --- | --- | --- | --- |
| **Version #** | **Date** | **Page #** | **Description** |
| 1 | 1/29/2016 |  | Version 1 is the complete Monitoring Manual with all forms for DOLA’s CDBG-DR Compliance Manager and all Partnering Agencies |
| 2 | 3/9/2016 | Throughout | Updates and edits throughout the Plan |
| 3 | 3/1/2017 – 8/3/2017 | Throughout  10  253-264  265-277  19-21  77-99, 165, 230-231  76-92, 163-165  229-233  153 | Updates for: missing links to appropriate federal regulations, monitoring forms, formatting for consistency and clarification  Added clarification on number of files to monitor  Added Summary Page of Citations  Added Appendixes 4 – 6: Housing File Review Forms  Matrix – updates to both forms as applicable  Updated small purchase threshold  Inserted Micro-Purchase item and two sub-questions about the use of minority-owned business on Procurements forms  Moved Tourism and Workforce forms from appendixes to section IV  Inserted Program Income item on Financial Management form |
| 3.1 | 10/17/17 | 139-145  Throughout | Inserted Low- and Moderate-Income Housing questions on National Objective form  Remove all references to the Workforce Development program |
| 3.2 | 1/5/18 | 20  230-234 | Partnering Agency’s Matrix – updated for Tourism program  Modified and consolidated Tourism monitoring forms |

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SECTION I. OVERVIEW OF CDBG-DR MONITORING PROCEDURES

1. Definitions of Terms, Acronyms, and Phrases

Please refer to the following for an explanation of commonly used names, acronyms, and phrases.

**Activity** – Any project that received a release of funds determination.

**Assisted Business** - A private for-profit business that is eligible to receive assistance from the CDBG-DR program under [24 CFR 570.203](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1203) and is responsible for the compliance requirements required to carry out an economic development project.

**Community Development Block Grant (CDBG-DR) DR Funds** – Type of grant provided through HUD to address a wide range of community development needs following a catastrophic disaster.

**Concern** - A deficiency in program performance not based on a statutory, regulatory, or other program requirement for which sanctions are not authorized.

**Contractor** – An entity competitively selected to provide clearly-specified goods or services. The contract price is established through the procurement process. CDBG-DR funds are paid to the contractor as compensation for the satisfactory provision of the goods and services as specified in the contract.

**Corrective Action** - Steps to be taken to resolve any findings or concerns.

**DOLA** –Denotes the Department of Local Affairs. This is the agency ultimately responsible to HUD for the proper management of the CDBG-DR programs.

**DOLA’s CDBG-DR Compliance Manager** - DOLA has identified the DR Compliance Manager as the staff who will ensure overall program compliance for the State of Colorado’s CDBG-DR program. This person’s main responsibility will be the monitoring of the Partnering Agencies.

**Date of Incident** – Date specific damage occurred in individual communities.

**Developer** – Someone who buys land, finances real estate deals, builds or has builders build projects, creates, imagines, controls, and orchestrates the process of development from the beginning to end. Typically, developerspurchase a tract of land; determine the marketing of the property; develop the building program and design; obtain the necessary public approval and financing; build the structure; and lease, manage, and ultimately sell it.

**Direct or Indirect Disaster Impact** – HUD regulations require funds to be used for necessary expenses related to disaster relief, long term recovery, and restorations of infrastructure, housing and economic revitalization in areas affected by the floods and fires in Colorado. Direct relationship is a clear, direct disaster impact – flooded homes or buildings, bridge damages, debris and damage removal and repair. There is flexibility allowed within the statute and regulations for economic revitalization within a community whose economy was negatively affected as an indirect result of the disaster(s). Example: Job loss due to flooding of businesses or decrease in business activity in a designated disaster county.

**Disaster** – Natural disasters occurring for which the President declared a major disaster in accord with the Stafford Act.

**Disaster Funding** - [Public Law 113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf), enacted on January 29, 2013 provided $16 billion through the Community Development Block Grant (CDBG-DR) program for “necessary expenses” related to disaster relief; long-term recovery; and restoration of infrastructure, housing, and economic revitalization in areas affected by hurricanes, floods, and other natural disasters occurring during 2011, 2012, and 2013.

**Duplication of Benefit** – The Stafford Act requires that there be no duplication of funds from CDBG-DR Disaster, FEMA, SBA, the Corps of Engineers, private insurance claims benefits, other HUD programs, and other state assistance to individuals, businesses, for-profit or nonprofits or other recipients.

**Finance/Accounting Staff** – Staff responsible for financial/drawdown review and reporting.

**Finding** - A deficiency in program performance based on a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized.

**GAAP** – (Generally Accepted Accounting Principles) According to [2 CFR 200.49](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1#se2.1.200_149) GAAP has the meaning specified in accounting standards issued by the Government Accounting Standards Board (GASB) and the Financial Accounting Standards Board (FASB).

**Grantee** – DOLA, a State Agency which is the entity that receives CDBG-DR funds directly from the federal awarding agency; the U.S. Department of Housing and Urban Development.

**Grant Manager** – The individual designated by the Partnering Agency’s Program Manager to assist in day-to-day management of a Disaster Recovery Grant Program.

**Grant Monitor** – Individual performing monitoring activities. This is a generic term that can refer to DOLA’s CDBG-DR Compliance Manager or the Partnering Agency’s representative designated to be responsible for monitoring Subgrantees or beneficiaries.

**HUD** – Denotes the United States Department of Housing and Urban Development – the federal agency providing administration and oversight of CDBG-DR funding.

**Interagency Agreement (IA)** – A binding agreement entered into by DOLA and Partnering Agencies that receive federal financial assistance in order to carry out a public purpose authorized by Disaster Funding.

**Limited Clientele (LC)** - A L/M Income Limited Clientele activity is an activity that provides benefits to a specific group of persons rather than everyone in an area generally. It may benefit particular persons without regard to the area in which they reside, or it may be an activity that provides benefit on an area basis, but only to a specific group of persons who reside in the area.

**Monitored Entity** – Entity (*i.e.,* grantee, Subgrantee, and/or Subrecipient) evaluated during a monitoring review.

**Partnering Agency** – Entities receiving Disaster Recovery funds passed through by DOLA through an Interagency Agreement or has been given the responsibility to manage Disaster Recovery programs. Partnering Agencies are: Boulder County Collaborative (BCC), Division of Housing (DOH), Division of Local Government (DLG), Division of Homeland Security and Emergency Management (DHSEM), Office of Economic Development and International Trade (OEDIT), Colorado Department of Agriculture (CDA). Partnering Agencies are Subgrantees.

**Presidential Disaster Declaration or Declarations** – The FEMAdocument that identifies the disaster and its designated areas, counties, and date, or dates specific to FEMA/Stafford Act requirements.

**Program***–* Denotes the DOLA-Funded Programs:

* Home Access Program (HAP)
* Tenant Rental Assistance (TRA)
* Housing Rehabilitation and Reconstruction (HRR)
* Housing Purchase (Down Payment Assistance)
* Property Acquisition/Buyout Program (PABP)
* Multifamily Rental Construction and Repair
* Single Family Construction
* Resiliency Planning and Capacity Building
* Watershed Resilience Pilot
* Privately Owned and Non-Profit Ditch Company Grant
* Recover Colorado Infrastructure Grant
* FEMA Match Program
* Economic Development Grant and Loan
* Tourism and Marketing
* Technical Assistance for Small Businesses
* Agriculture Grant Program

**Program Administrator** – Subrecipient staff in charge of the program administration.

**Program Beneficiary** - Individuals or entities that receive payments, services, or other kinds of assistance from programs or activities that constitute the public purpose authorized under the federal award.

**Program Management Team** – Partnering Agency’s Staff responsible for program development, notification of fund availability, technical assistance, grant request acceptance, evaluation, rating, and award. In addition, staff is responsible for day-to-day management, monitoring, invoice processing, and payment.

**Subgrantee** – A state or local governmental entity receiving CDBG-DR funds directly from DOLA, also defined as the Partnering Agency.

**Subrecipient** – Entities or organizations that are provided CDBG-DR funds by Partnering Agencies of DOLA, for use in carrying out agreed-upon, eligible activities. Examples of Subrecipients are: public housing authorities, community development finance institutions, private non-profits, and Community Based Development Organizations (CBDO).

**Waivers** – Changes to regulations allowable under disaster allocations only. Waivers are published regulations in the official Federal Registers. (Vol. 78, No. 43/Tuesday, March 5, 2013; Vol. 78, No. 76/Friday, April 19, 2013; Vol. 78, No. 103/Wednesday, May 29, 2013; Vol. 78, No. 149/Friday, August 2, 2013; Vol. 78, No. 222/Monday, November 18, 2013; Vol. 78, No. 241/Monday, December 16, 2013; Vol. 79, No. 59/Thursday, March 27, 2014; Vol. 79, No. 106/Tuesday, June 3, 2014; Vol. 79, No. 133/Friday, July 11, 2014; Vol. 79, No. 194/Tuesday, October 7, 2014; Vol. 79, No. 200/Thursday, October 16, 2014; Vol. 80, No. 5/Thursday, January 8, 2015; Vol. 80, No. 63/Thursday, April 2, 2015; Vol. 80, No. 90/Monday, May 11, 2015; Vol. 80, No. 164/Tuesday, August 25, 2015; Vol. 80, No. 222/Wednesday, November 18, 2015). See Appendix 3 for a complete listing of CDBG-DR laws and regulations.

1. Disaster Recovery Monitoring and Responsibilities

The U. S. Department of Housing and Urban Development (HUD) requires that the Grantee (DOLA) monitors Subgrantees (Partnering Agencies) and that Subgrantees (Partnering Agencies) monitor Subrecipients for program performance and compliance with program polices, statutory, and/or regulatory requirements of Community Development Block Grant Disaster Recovery (CDBG-DR) funds ([24 CFR 570.492](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:3.1.1.3.4&idno=24#se24.3.570_1492)). HUD will monitor DOLA to ensure that the State has performed the proper oversight and monitoring of the Subgrantees in order to ensure disaster recovery programs are operating according to approved action plans; are compliant with applicable statutes and regulations; have the necessary financial controls and administrative systems to minimize fraud, waste, and abuse; and have proper source documentation for program and project expenditures of CDBG-DR funds ([24 CFR 570.493](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:3.1.1.3.4&idno=24#se24.3.570_1493)). Based on HUD’s risk assessment, some DR programs will be selected for in-depth monitoring. The ultimate goal of HUD’s monitoring is to determine whether the State, Subgrantees, and Subrecipients have the continuing capacity to implement the programs efficiently and in a timely manner, and that the program is being conducted in compliance with the applicable Federal and State laws and requirements. While most of HUD’s monitoring will be performed at DOLA’s level, certain Subgrantees or Subrecipients may be selected by HUD for monitoring to ensure that DOLA is monitoring Subgrantees properly and Subgrantees are monitoring their Subrecipients properly.

“Monitoring” is designed to assist the entity being monitored by ensuring that programs are operated efficiently and in a timely manner and that the program is being conducted in compliance with applicable Federal and State laws and requirements. This Compliance and Monitoring Plan will be utilized for programs appropriated under the Disaster Relief Appropriations Act 2013 ([PL 113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf)). The plan provides for a comprehensive risk-based compliance and monitoring strategy. Risk-based monitoring will be used to focus attention on program areas and participants that represent the greatest risk or susceptibility to fraud, waste, and mismanagement.

Disaster funding basically follows the same laws, regulations, and policies as the regular CDBG Program rules. There are, however, some very distinct differences that must be acknowledged to ensure appropriate monitoring of disaster funds. The following items are unique and specific to disaster funds and are covered more in-depth within this document:

* Direct and indirect impacts of disaster can be funded
* Duplication of Benefits are not allowed
* Waivers, which allow for program flexibility

An explanation of commonly used names, acronyms, and phrases used throughout the monitoring plan may be found in the definitions section above.

**Organizational Overview**

The State of Colorado’s process for the program management of the CDBG-DR funds is unique. There are five (5) State Agencies designated to implement specific Disaster Recovery Programs, and one (1) entitlement community has been designated to administer a set-aside for an entire county. All of these Partnering Agencies have previous experience and/or specific expertise in their respective programs, which led to their designation. The overall management and associated monitoring levels are illustrated in the oversight structure chart below:

**OVERSIGHT STRUCTURE**

HUD

Awarding Agency

* Agriculture Business Grants

Dept of Local Affairs

Grantee

Office of Economic Development & Intl Trade

Colorado Dept of Agriculture

Division of Homeland Security & Emergency Mgmt

Division of Local Government

Division of Housing

Boulder County Collaborative

Level Two Monitoring of Partnering Agencies (Subgrantees)

* Economic Develop-ment Grants and Loans
* Tourism and Marketing
* Technical Assistance for Small Businesses
* Infrastruc-ture and Public Facilities
* Buyouts and Acquisition
* FEMA Match
* Home Access
* Temporary Rental Assistance
* Housing Repair
* Housing Purchase
* Acquisition and Buyouts
* Multifamily Rental New Construc-tion and Repair
* Single Family New Construc-tion
* Resiliency Planning and Capacity Building
* Watershed
* Private and Non-profit Ditch Companies
* Infrastruc-ture and Public Facilities
* Buyouts and Acquisition
* Temporary Rental Assistance
* Down Payment Assistance
* Housing Rehab (SF & MF)
* Clearance and Demolition
* Home Access

Level One Monitoring of the Grantee (and Subgrantees)

Level Three Monitoring of Subrecipients and Beneficiary Programs

**ROLES AND RESPONSIBILITIES OF MONITORING**

Monitoring requires coordination among all parties. The following narrative provides a summary of the various roles and responsibilities each will play in the monitoring of DR programs. The following represents the three levels of monitoring required and the entity responsible for monitoring.

First Level Monitoring (HUD)

As shown in the oversight organizational chart above, HUD is the awarding agency and DOLA (Grantee) is the recipient of the Disaster Recovery funds. In accordance with [24 CFR 570.493](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:3.1.1.3.4&idno=24#se24.3.570_1493), HUD is required to monitor Grantees at least once annually. HUD has the authority to monitor the Grantee, Subgrantees, and Subrecipients.

Second Level Monitoring (DOLA)

Since DOLA is the Grantee (direct recipient) of the CDBG-DR monies, it is DOLA’s CDBG-DR Compliance Manager’s responsibility to monitor the Subgrantees (Partnering Agencies) for compliance with the applicable federal and state laws and regulations relative to the CDBG-DR program. The DOLA CDBG-DR Compliance Manager is also responsible to ensure Subgrantees have compliant policies and procedures in place to implement the program(s) in compliance with the approved Action Plan and applicable State and federal laws and regulations. The Compliance Manager at DOLA has been given the responsibility for monitoring Subgrantees and, if needed, Subrecipients.

Third Level Monitoring (Partnering Agencies)

Subgrantees (Partnering Agencies) are responsible for monitoring Subrecipients and/or beneficiaries to determine if the grant is being conducted in compliance with applicable Federal and State laws and requirements. The review will also determine the Subrecipient’s ability to implement the program in a timely manner. The monitoring consists of a review of project files, records, and documentation as well as a visit to the project site. All monitors are responsible for updating the Google “Monitoring Calendar” with their monitoring schedules, as well as posting monitoring results and uploading all completed monitoring forms and reports/letters to the Monitoring and TA Tracker sheet located in the Google drive within 10 days of completion of the event or issuing the report/letter.

1. Monitoring Plan Objectives

The primary objectives of the overall monitoring processes are to:

* Gauge the overall program progress in meeting the objectives, goals, and deliverables articulated in the executed agreements;
* Serve as a management tool to identify issues that may compromise program integrity, funding, and service delivery for corrective action and resolution;
* Substantiate compliance with applicable federal statutes, regulations, waivers, policies, etc.;
* Substantiate compliance with Colorado’s Action Plan and Substantial Amendments, Program policies, applicable state laws, etc.;
* Substantiate Subgrantee or Subrecipient is carrying out the program or project in a timely manner in accordance with the schedule included in the grant agreements;
* Substantiate Subgrantee or Subrecipient is conducting the program in a manner which minimizes the opportunity for fraud, waste, and mismanagement; and
* Substantiate Subgrantee or Subrecipient has a continuing capacity to carry out the approved program or project in a timely manner.

1. Assessing Risk

The DOLA Disaster Recovery Compliance Manager will be responsible for developing the initial risk assessment for monitoring DOLA’s Partnering Agencies. Each Partnering Agency should also complete the initial risk analysis for monitoring of Subrecipients. The monitoring process is executed according to the timing determined by the **results of a Risk Assessment** and information gathered through desk monitoring. Higher risk programs or activities will be monitored more expeditiously, and monitoring efforts will focus more on on-site monitoring in conjunction with in-house reviews. During the monitoring reviews, the Grant Monitors will sample program, project, contractor, Subrecipient, or subcontractor documentation to draw conclusions about or validate the entity’s capacity to complete the program(s) in a timely and compliant manner.

The program areas to be monitored and timing of the monitoring reviews are partially determined by risk assessment results. Frequencies of the continued monitoring reviews will ultimately be determined by the outcomes of the on-site monitoring review.

The Risk Assessment is an important program tool used to:

* Identify, evaluate, and estimate potential areas of concern;
* Minimize negative impact to the programs; and
* Determine the timing and level of monitoring necessary.

Initially, each criterion below is scored as high, medium, or low risk based on defined thresholds. The combined scores determine the overall risk score. The risk assessment is used to determine the initial risk score of the Subgrantee and Subrecipient. Risk assessments should be conducted as soon as possible after an Interagency Agreement or Grant Agreement is signed and performed annually thereafter.

|  |  |  |  |
| --- | --- | --- | --- |
| **Category** | **Risk Assessment Criteria** | **Risk Category** | **Risk Points High – 10 Medium – 5 Low - 1** |
| **Funding** | This criterion is evaluated based on amount of funds awarded. | For the Partner Agencies:  >$40,000,000 – High (10)  $10,000,000-$40,000,000 – Medium (5)  < $10,000,000 – Low (1) |  |
| For Subrecipient Agencies:  >$5,000,000 – High (10)  $1,000,000 -$5,000,000 – Medium (5)  <$1,000,000 – Low (1) |
| **Project Type** | This criterion is evaluated based on the type of project(s) administered by the Grantee or Partnering Agency. | Housing and Economic Development – High (10)  Infrastructure – Medium (5)  Planning – Low (1) |  |
| **Number of Programs** | This criterion is evaluated based on the number of programs that each Partnering Agency or Subrecipients anticipated to be administering. | 6 or more Programs – High (10)  3-5 Programs – Medium (5)  3 Programs – Low (1) |  |
| **Use of Subrecipients/direct funding of non-profits via Subrecipient agreements** | This criterion is evaluated based on the final entity implementing the funds. | Awarded direct funding to new CDBG-DR entities - High (10)  Direct funding to Subrecipients - Medium (5)  Directly implementing the program - Low (1) |  |
| **CDBG-DR Experience** | This criterion is evaluated based on the final entity implementing the CDBG-DR funds. | 0-2 years’ experience – High (10)  3-5 years’ experience – Medium (5)  >5 years’ experience – Low (1) |  |

If a Subgrantee or Subrecipient totals more than 25 points in the chart above, they are considered a High Risk, 15-24 are Medium Risk, and less than 15 are Low Risk. If they are considered a “High Risk”, technical assistance should begin shortly after the grant agreement is executed. In addition, an on-site file review should be performed when approximately 10% of their funds have been requested from Subgrantee or Subrecipient. The recommended frequency and number of files to review is based on the below chart:

|  |  |  |
| --- | --- | --- |
| Subgrantee/Subrecipient Risk Level | On-Site Monitoring Frequency | \* No. of Activities  to monitor |
| High | 1 time per 3 months | 25% |
| Med | 1 time per 6 months | 15% |
| Low | 1 time per 9 months | 10% |

\*The number of activities to be reviewed will be based on the total number of new specific activities that the agency has monitored since last compliance monitoring visit or the agency may have issued payments. According to HUD, monitoring 10-20% of beneficiary files is the norm and an appropriate sample for determining if practices are carried out consistently and demonstrate a pattern or if an issue may be a “one off”. More files should be monitored if there are any issues found during a review.

**CDBG-DR projects are typically monitored more frequently than regular CDBG programs. This is for two major reasons:**

1. Uniqueness of the CDBG-DR regulations, waivers, and changes in the regulations between different tranches.
2. Due to the large amount of funds awarded in a CDBG-DR project in comparison to the regular CDBG Program the risk is much higher for non-compliance. If non-compliance would occur, it could result in one or several years of the regular CDBG funds being withheld from the State of Colorado.

The above risk assessment is an important program tool used in identifying program risks and specific areas that may be high risk. In addition, using the risk assessment will aid in prioritizing higher risk programs and determine the immediacy of providing technical assistance and monitoring. The risk assessment will assist the program management team in prioritizing what information needs to be requested from the Subgrantees or Subrecipients and reviewed prior to an on-site monitoring. However, if additional concerns are found while desk monitoring and/or an on-site visit, the risk assessment may be updated (or manual notations added for the next formal risk analysis) at any time during the executed grant period.

The Program Management team may choose to adjust monitoring frequency based on day-to-day management and review of performance results (scope of work deliverables) completed, time lapse since last monitoring review, or other criteria.

In addition to on-site file monitoring visits for normal monitoring purposes, on-site project monitoring visits may also be performed when construction is underway. It is the responsibility of the Partnering Agency to conduct all on-site monitoring visits of Subrecipients. The DOLA CDBG-DR Compliance Manager should be notified of Partner Agency on-site visits so that DOLA may participate as a part of DOLA’s responsibility to monitor Subgrantees. DOLA is cognizant of reducing the burden on both the Subgrantee and the ultimate beneficiary.

It should be noted that problems may impact the time available for staff to monitor low-risk grantees. Management will need to make decisions that impact the timing of monitoring and the monitoring plan based on reasonable needs and staff availability. Low-Risk Grantees are those with a risk score of less than fifteen (15). Those grantees may be monitored via desk monitoring rather than on-site with management agreement and documentation in the file.

1. Types of Monitoring

There are two primary types of Monitoring, “Desk Monitoring” and “On-site Monitoring”.

5.1 Desk Monitoring

Ongoing remote evaluation is the primary method of tracking Subgrantee, Subrecipient, or beneficiary performance/compliance on a daily basis, determining the need for technical assistance, obtaining data to plan for the routine site visits, and determining the need for exception site visits. To the extent possible, this evaluation utilizes existing data that is routinely submitted for other purposes. Much of the data is captured in the office’s in‐house electronic grants management tracking system. The following are examples of data submitted which are utilized:

* + Funds Obligated
  + Funds Expended
  + Dollars Obligated to meet 80% regulation
  + Dollars Obligated to meet LMI requirement
  + Notice of contract award
  + Final wage compliance report
  + Citizen complaints
  + Audits

The first ongoing evaluation activity is to examine the Subgrantee, Subrecipient, or beneficiary’s Project Performance Plan (PPP), approved application, and contract. All activities included on the PPP should be consistent with the approved application (and any pertinent program amendments). The time period indicated should be reasonable and consistent with the project’s contract period. Contract conditions established in the recipient’s contract should also be tracked for timely completion.

The request for payments and PPP provide the most current information on the performance of the Subgrantee or Subrecipient’s program. The request for payment file can be used as a tool to:

* + Compare cumulative drawdowns with funds budgeted to make sure the amount drawn does not exceed the budgeted amount without appropriate changes.
  + Determine if activity drawdown rates reflect the PPP contained in the agreement. Discrepancies between the schedule and the amount drawn should be discussed with the Subgrantee, Subrecipient, or beneficiary.
  + Activities on the schedule for which no funds have been drawn after the proposed scheduled initiation date should be discussed with the Subgrantee, Subrecipient, or beneficiary.
  + Determine if a revised PPP is needed as the result of a project delay, program amendment, or contract extension. When appropriate, a revised PPP is requested as well as an explanation for the reason the program activities are behind schedule. The recipient must submit a detailed timeline indicating the realistic proposed time of completion of the activities. The timeline duration should not exceed the time frame of the current contract.

Any complaints made to DOLA/Partnering Agency about a DR program are sources of valuable compliance information. A record of the complaints received, identifying the actions taken and the results of the actions are maintained in the permanent grant file. The validity of all complaints suggesting problems in performance or compliance should be included in the assessment of the Subgrantee’s or Subrecipient’s need for regular or exception monitoring.

The following section briefly describes the steps involved in on-site monitoring.

5.2 On-site Monitoring Visit Preparation

The preparation for monitoring may vary depending on the time the Grant Monitor or CDBG-DR Compliance Manager (Grant Monitors) has spent desk monitoring of the Subgrantee or Subrecipient. The Grant Monitors should review in-house files and project reports and other data to obtain a sense of any problem areas and/or documents that are not on time or of concern. Using that information, the Grant Monitors should select all appropriate checklists for use on the monitoring trip and prioritize the review topics using the appropriate Monitoring Matrix. All applicable compliance topics must be monitored using the DR monitoring forms, throughout the course of the written agreement, unless there are valid reasons why this cannot be accomplished.

Grant Monitors may choose to conduct a partial monitoring (a portion of the required checklists and topics) or a full monitoring (all checklists and all topics) depending on the time the monitors or the subgrantee or subrecipient agency have available as long as the full monitoring is completed within the term of the written agreement, keeping in mind that some areas of compliance should be monitored earlier or more frequently, depending on the risk.

The Grant Monitors should also use the information collected during day-to-day management for preparation of on-site review. Items such as project application, executed grant agreement, recent status reports, financial reports, employee time sheets, reports from past monitoring reviews, drawdown information, policy and procedures manuals, and any previous correspondence provided by the Subgrantees or Subrecipients. Review of the above information will assist in determining what specific high risk areas to give priority during the monitoring visit.

Grant Monitors are responsible for being thoroughly familiar with the CDBG-DR Disaster Recovery Program regulations and of the entities to be monitored. Such comprehensive knowledge is critical for making the most of scarce time and resources and effectively determining compliance and accomplishments, especially given program complexities.

As stated above, the preparation process involves:

* Understanding the government statutes, regulations, waivers, and official guidance;
* Reviewing and analyzing participant reports, available data, office files, audits and financial information, previous monitoring reports, and issues; and
* Obtaining other relevant information from knowledgeable office staff.

The preparatory work may result in revisions to the monitoring strategy with respect to the areas to be covered, estimated time frames, and/or staff resources needed and participant staff to be consulted.

Detailed checklists are included in the Monitoring Plan. The Grant Monitor will be guided through the process with detailed checklists and related narrative as appropriate. Formal written or email notification is provided, if at all possible, at least two weeks in advance from the date of the monitoring visit.

An entrance conference shall be conducted at the beginning of the on-site visit. At the entrance conference, the Grant Monitor will describe the monitoring process, share a summary of potential areas for review, and confirm logistics.

Additional items to be covered in the entrance conference may be:

* Explanation of how the monitoring will be conducted;
* Identify/confirm key program participant staff who will be needed during the monitoring;
* Set up or confirm meeting and interview times (including any clients who may be interviewed and, if applicable, schedule physical inspections);
* Verify the programs/activities to be reviewed and, if on-site, how access to files and work areas will be granted. (Some program files can be sensitive; some work areas can be hazardous.)

5.3 Conducting On-site Monitoring – (Early and Often)

On-site monitoring conducted by the DOLA CDBG-DR Compliance Manager will occur at the Partnering Agency office. All records required to complete the monitoring should be available for inspection at that location. On-site monitoring by the Partnering Agency includes both the activities of the subgrantee/subrecipient agency funded, and beneficiary files, if applicable. The monitoring should be conducted at a site where the agency files and staff are accessible and program records are maintained or production occurs, or both. On-site monitoring is an effective way to:

* Validate desktop reviews
* Identify and/or research discrepancies
* Closely monitor high-risk program components

On-site monitoring may include the following items depending on the monitoring identified as necessary:

* Collecting information
* Selecting files for review
* Conducting file reviews
* Reviewing project documents
* Observing actual project activities
* Conducting interviews to clarify and determine accuracy of information
* Identifying aspects of the project where the grantee is performing well or poorly
* Assessing compliance with program and regulatory requirements
* Determining whether record keeping is adequate
* Verifying construction activities for performance progress, discrimination, and labor compliance, where applicable
* Additional actions or reviews may also be determined necessary while on-site

The on-site monitoring checklists included in the monitoring plan are the primary tools to be used by the DOLA CDBG-DR Compliance Manager and those that the Partnering Agencies will use to monitor subgrantees/subrecipients. The checklists were developed using existing Partnering Agency monitoring checklists and [HUD Monitoring Handbook 6509.2](https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2). These checklists serve to document the review results of the Monitored Entity’s files to determine if the activity is compliant with program and regulatory requirements and progressing in a timely manner. The on-site monitoring process is comprised of several different checklists. Only the applicable checklists need to be utilized. Applicability of a particular compliance topic to be monitored depends upon the program/project design and any statutory or regulatory waivers that may apply. The checklists are comprised of questions related to on-site reviews regarding each of the following areas: program/project progress, duplication of benefits, financial management, procurement and contracting, monitoring, national objective, eligible activities, labor, civil rights, environmental review, acquisition and relocation, etc.

During the on-site visit, the Grant Monitor reviews the Subgrantee or Subrecipient program files for compliance with all applicable regulatory and program requirements. During each scheduled on-site visit, a thorough file review (based on the topics of review) should be performed using the appropriate monitoring checklists. The Grant Monitor should properly record the results of the on-site monitoring visit or desk monitoring by completing all applicable checklists and documenting with clear notes the basis for the conclusions, any questions, findings, or concerns. Supporting documentation should be attached to the checklists to support conclusions from the review when not in office files if the Grant Monitor feels that future questions or problems might arise. It is not necessary to include all documents reviewed, but notations in the comments section of the checklists should be used to describe the documents and its location on-site or in office files. A matrix has been created to identify all necessary forms to conduct on-site monitoring reviews.

An exit conference, when possible, will be conducted at the end of the on-site visit to discuss monitoring results. The Grant Monitor, to the extent possible, should work with the monitored entity on-site to correct any problems. The exit conference discussion includes any potential findings or concerns that may be a part of the formal monitoring letter. The Grant Monitor prepares a monitoring letter based upon an analysis of the on-site monitoring checklists and supporting documentation. Including a finding in the monitoring letter not discussed with the grantee can destroy working relationships and trust with grantees.

In discussing major problems which may affect the feasibility of the entire program, the Grant Monitor should indicate an appropriate level of concern and note the problems and possible results on the performance checklist and discuss these issues with the Monitored Entity. Examples of such problems include litigation, inability of developer to obtain financing, loss of local funding commitments, etc. Early notification of major problems will permit the State to provide technical assistance and prepare contingency plans. Always note such problems as soon as they appear. Common causes of program delay are:

* Lack of staff;
* Staff with limited experience or capacity;
* Original schedule developed without consideration of construction seasons, acquisition requirements, Davis-Bacon requirements, environmental review, etc.;
* Delays in acquisition due to unwilling seller;
* Difficulties in locating replacement housing for displaced persons;
* Local or other funds no longer available;
* Bids received exceed funds available;
* Incorrect or inadequate advice from consultant; and
* Litigation.

5.4 Monitoring Conclusions

As a result of the monitoring reviews, the Grant Monitor may reach one or more of the following conclusions:

* Performance was adequate or exemplary;
* There were significant achievements;
* There were concerns that need to be brought to the attention of the grantee;
* Technical assistance was provided or is needed; and/or
* There were deficiencies that require corrective actions.

In the event that deficiencies are found, the Grant Monitor should suggest or recommend actions that can be taken to address the deficiency based on sound management principles or other guidelines. Corrective action plans should be implemented for identified findings and concerns.

5.5 Monitoring Letter

Upon completion of the monitoring review, the Grant Monitor will prepare a Monitoring Letter describing the results in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. The letter should be completed and sent to the monitored entity within forty-five (45) days if at all possible. Generally, the tone of the Monitoring Letter should be positive, in recognition of our common goal to responsibly and effectively implement CDBG-DR programs. The letter may include significant accomplishments or positive changes to establish and maintain positive relationships and to recognize the dedication and commitment of the Subgrantee/Subrecipient staff to the program missions. However, the monitoring letter should not include general statements that the grantee “complied with all applicable rules and regulations.” Such broad general statements can negate the ability to apply sanctions, if deemed necessary, at a later date. Monitoring reviews cover the selected program, technical areas, and often times include selected samples. Monitoring conclusions therefore, will be qualified, i.e., “based upon the materials reviewed and the staff interviews, the activity/area was found to be in compliance with specific requirements.” The Monitoring Letter should fully communicate every finding and concern. A sample monitoring letter is included as Appendix 2.

Each Monitoring Letter should include:

* The program, project, or entity monitored
* The dates of the monitoring
* The name(s) and title(s) of the staff who performed the monitoring review
* A listing of the program/project/activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter)
* If applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area)
* Monitoring conclusions
* If applicable, clearly labeled findings and concerns
  + Every finding must be followed with the federal citation that applies
  + Recommended corrective actions
* An opportunity for the grantee to demonstrate compliance with the requirements, if findings were notated
* Response timeframes (if needed)
* An offer of technical assistance (if needed)
* Or a description of technical assistance provided during the monitoring

If upon monitoring, the Grant Monitor discovers that an activity falls behind the initial approved PPP, a new schedule may be requested in writing by the Program Manager to the Disaster Recovery Director with justification as to why the program/activity is behind schedule. A new PPP, however, should not be requested simply to reflect that more time is needed to complete the activity. Instead, the new or revised PPP must reflect with accuracy the proposed time of completion of the activities. Based on the two year HUD requirement, DOLA will determine if it is appropriate to provide a time extension or find other alternatives.

The Grant Monitor should allow the Monitored Entity **forty-five (45)** days to respond in writing to the findings of deficiency noted in the letter. In the response letter, one must describe all corrective actions taken or provide new information not reviewed during the visit. The corrective actions should generally follow the recommendations made by the Grant Monitor. Copies of supporting documentation demonstrating that corrective action has been taken will be required. The Grant Monitor will then inform the Monitored Entity if the response is sufficient to permit them to clear the findings or resolve any concerns. Additional time for corrective action may be allowed on a case-by-case basis. Failure by the Monitored Entity to correct deficiencies may result in funds being withheld, disallowed, and/or possible restrictions on future grants, including any recapture or repayment funds to the State. All findings from monitoring visits must be cleared prior to project close-out.

5.6 Monitored Entity Corrective Action Plan

If deficiencies are found, the monitored entity must submit a corrective action plan. In the corrective action plan, the monitored entity must describe the corrective action taken or planned in response to the findings and/or concerns identified by the Grant Monitor, as well as provide a firm timeline for when corrections will be completed or implemented and then provide evidence of the corrections.

DOLA, a Partnering Agency, or Subrecipient may choose to postpone the monitoring letter in favor of detailed technical assistance to the Monitored Entity if the monitored entity has unique issues that require substantial changes to the grant. The extra time for finalizing the monitoring letter MUST be documented with an interim letter to the DOLA/Partnering Agency/Subrecipient or by a phone call/conference call with an explanation for the reasons for a postponed response. This action should be documented by in-house documents showing activity, ongoing research, and issue discussions.

5.6 Follow-up

In the event that findings or concerns are identified during monitoring, follow-up actions (visits, emails, phone calls) should be scheduled to address the progress of the proposed resolution. All contracts should be documented in the monitoring file. The timing and frequency of the follow-up communication should be determined at the discretion of the Grant Monitor/Partnering Agency/Subrecipient and/or specifications in monitoring letters.

If previous findings or concerns remain unresolved, or if a previously identified monitoring deficiency remains uncorrected, these issues will also require follow-up activity. All follow-up actions are documented and communicated to the Monitored Entity. When corrective action is required, target dates must be assigned for resolution objectives.

1. Technical Assistance

As discussed earlier in this document, the Risk Assessment can be a valuable tool to determine which entities need technical assistance prior to monitoring. Desk monitoring and on-site monitoring also provide information that can be used to determine what kind of technical assistance is needed. The DOLA CDBG-DR Compliance Manager is responsible for providing technical assistance to the Partner Agencies, and the Partner Agencies are responsible for providing technical assistance to their Subrecipients. When deficiencies are identified as a result of monitoring, or desk monitoring, technical assistance may be required to assist in the resolution of a deficiency. The objective of technical assistance is to aid the Subrecipient/ Subgrantee in the day-to-day management of the program in compliance with program and regulatory requirements. The nature and extent of technical assistance should be determined at the discretion of the Program Management Team. Examples of technical assistance may include:

* Verbal or written advice;
* Formal training; and/or
* Resources.

1. Monitoring Checklists

The monitoring checklists are the primary tools used to monitor performance and compliance in the Disaster Recovery Programs. They have been designed to be as self-explanatory as possible. Staff assigned the responsibility for monitoring programs should be familiar with the program requirements. The checklists contain the minimum requirements, which should be met.

Section II contains the checklists that DOLA’s CDBG-DR Compliance Manager will use to assure overall compliance by their Partnering Agencies.

Section IV contains the checklists that the Partnering Agencies will use to monitor Subrecipients/beneficiaries.

The checklists are divided by program areas such as housing, new construction, public facilities, economic development, etc. They are then further broken down by compliance area such as labor standards, fair housing and economic opportunities, financial management, acquisition/buyout, environmental review, national objective, eligibility, etc.

A concise review of program implementation must be performed using the appropriate checklists. The specific items to be reviewed will depend on the stage of progress when visited, the type of project, and whether or not it is the first or a subsequent visit. The DOLA CDBG-DR Compliance Manager may also use any of the Partnering Agency’s Checklists if they choose to monitor a specific program activity for compliance.

The scope of work and performance measures included in an Interagency Agreement and/or the grant or loan agreement are the basic tools for assessing program performance. Due to the abbreviated recent time limit for expenditures of disaster funds, DOLA will be closely monitoring the two-year limit as a contract condition. The partnering agencies should also closely monitor the approved Scope of Work, Performance Measures, and any subsequent revisions or amendments to ensure timely completion of projects.

Finally, matrixes have been provided to assist the Grant Monitors to choose the appropriate forms for monitoring the various programs. The first matrix is for DOLA’s CDBG-DR Compliance Manager for use in monitoring Subgrantees, and the second matrix is for the Subgrantee to use in monitoring their Subrecipients.

The matrixes are a guide to utilizing the CDBG-DR program compliance checklists for monitoring the different DR programs. There are some CDBG-DR program requirements that are applicable to every CDBG-DR funded program: NATIONAL OBJECTIVE, ENVIRONMENTAL REVIEW, DUPLICATION OF BENEFITS and others that are common to all Disaster Recovery programs. These compliance areas will be marked with an “X”. Some compliance checklists will only be applicable depending on the specifics of the program activities. For example: If the *Multifamily Housing* program should employ a contractor to do more than eight housing units on a common property, the LABOR STANDARDS checklist must be utilized. If the contractor’s project is less than eight housing units then the LABOR STANDARDS checklist will not apply. The compliance areas that depend on the specifics of the program are unmarked. Some of the compliance checklists will in no conceivable circumstances apply to certain programs; for example, the PUBLIC IMPROVEMENTS checklist has no relevant compliance questions to the *Tourism and Marketing* program.

7.1 Compliance Manager’s (Stephanie) Monitoring Matrix Guide

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| DOLA’S CDBG-DR Compliance Managers MONITORING CHECKLISTS | Eligibility and National Objective/ All Programs | Eligibility and National Objective Review Worksheet | Housing Repairs/ Reconstruction | Economic Development | Public Improvement | Housing New Construction | Acquisition/ Buyouts /Relocation | Planning | Subgrantee Management | Duplication of Benefits | Environmental Review | Procurement/Subgrantee Monitoring | Procurement/ Sub-grantees Procurements | Labor Standards | Fair Housing and Equal Opportunity | Temporary Rental Assistance | Tourism | Down Payment Assistance |
| Agriculture Grants | **X** | **X** |  | **X** |  |  |  |  |  | **X** | **X** |  |  | **I/A** | **I/A** |  |  |  |
| Clearance and Demolition | **X** | **X** |  |  |  |  | **X** |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| Down Payment Assistance | **X** | **X** |  |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  | **X** |
| Economic Development Grant and Loans | **X** | **X** |  | **X** |  |  |  |  | **X** | **X** | **X** | **X** | **X** |  |  |  |  |  |
| Home Access | **X** | **X** |  |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |
| Infrastructure & Public Facilities-Includes FEMA PA Match | **X** | **X** |  |  | **X** |  | **I/A** |  | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |
| MF HSG Rehab/Recon | **X** | **X** | **X** |  |  |  | **I/A\*\*** |  | **X** | **X** | **X** | **X** | **X** | **I/A** | **X** |  |  |  |
| Privately Owned & Non-Profit Ditch Companies | **X** | **X** |  |  | **X** |  | **I/A** |  | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |
| Property Acquisitions and Buyouts-Includes FEMA HMGP Match | **X** | **X** |  |  |  |  | **X** |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| Resiliency Planning and Capacity | **X** | **X** |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| SF HSG Rehab/Recon\* | **X** | **X** | **X** |  |  |  | **I/A\*\*** |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| Single/Multi Family New Construction | **X** | **X** |  |  |  | **X** | **I/A** |  | **X** | **X** | **X** | **X** | **X** | **I/A** | **X** |  |  |  |
| Technical Assistance for Small Businesses | **X** | **X** |  | **X** |  |  |  |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| Temporary Rental Assistance | **X** | **X** |  |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** |  | **X** | **X** |  |  |
| Tourism and Marketing | **X** |  |  |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** |  | **X** |  | **X** |  |
| Watershed Capacity | **X** | **X** |  |  |  |  |  | **X** | **X** | **X** | **X** | **X** | **X** |  | **X** |  |  |  |
| Watershed Implementation | **X** | **X** |  |  | **X** |  | **I/A** |  | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |

\*\*Temporary relocation may be used under these programs. I/A – If applicable

### 7.2 Partnering Agency’s Monitoring Matrix Guide

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Partnering Agencies’ Monitoring Forms | National Objective | Environmental Review | Financial Management | Procurement | Fair Housing Equal Opportunity | Public Improvements | Labor Standards | Housing Rehabilitation | Housing New Construction | Acquisition/ Buyouts/ Relocation | Economic Development | Tourism | Duplication of Benefits | Section 3 |
| Agriculture Grants | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |  |  | **X** | **X** |
| Clearance and Demolition | **X** | **X** | **X** | **X** | **X** |  |  |  |  |  |  |  | **X** | **X** |
| Down Payment Assistance\* |  | **X** | **X** | **X** | **X** |  |  |  |  |  |  |  | **X** |  |
| Economic Development Grant and Loans | **X** | **X** | **X** |  | **X** |  |  |  |  |  | **X** |  | **X** |  |
| Home Access | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  | **I/A** |  |  | **X** |  |
| Infrastructure & Public Facilities-Includes FEMA PA Match | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  | **I/A** |  |  | **X** | **X** |
| Multifamily Housing Rehab/Reconstruction | **X** | **X** | **X** |  | **X** |  | **X** | **X** | **X** | **I/A** |  |  | **X** | **X** |
| Privately Owned & Non-Profit Ditch Companies | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  | **I/A** |  |  | **X** |  |
| Property Acquisitions and Buyouts-Includes FEMA HMGP Match | **X** | **X** | **X** | **X** |  |  |  |  |  | **X** |  |  | **X** | **X** |
| Resiliency Planning and Capacity | **X** | **X** | **X** | **X** | **X** |  |  |  |  |  |  |  | **X** |  |
| Single Family Housing Rehab/Reconstruction\* |  | **X** | **X** | **X** | **X** |  |  | **X** |  |  |  |  | **X** | **X** |
| Single/Multi Family New Construction | **X** | **X** | **X** |  |  |  | **I/A** |  | **X** | **I/A** |  |  | **X** | **X** |
| Technical Assistance for Small Businesses | **X** | **X** | **X** | **I/A** | **X** |  |  |  |  |  |  |  | **X** |  |
| Temporary Rental Assistance\* |  | **X** | **X** |  |  |  |  |  |  |  |  |  | **X** |  |
| Tourism and Marketing |  |  |  |  |  |  |  |  |  |  |  | **X** |  |  |
| Watershed Capacity | **X** | **X** | **X** |  | **X** |  |  |  |  |  |  |  | **X** |  |
| Watershed Implementation | **X** | **X** | **X** | **X** | **X** | **X** | **X** |  |  |  |  |  | **X** |  |

\*Partnering Agency uses additional forms located in the Appendices

I/A – If applicable

SECTION II. DOLA’S CDBG-DR COMPLIANCE MANAGER’S (Stephanie) MONITORING FORMS

The following forms will be utilized by DOLA’s CDBG-DR Compliance Manager to monitor Subgrantees.

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**SECTION II-A**

1. Eligibility and National Objective

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR ELIGIBILITY AND NATIONAL OBJECTIVE**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

| **Eligible Activity(ies)** | **Budgeted** | **Expended** | **Activity**  **Descriptions** |
| --- | --- | --- | --- |
| Section 105(a)(13): Administration |  |  | Click here to enter text. |
| Section 105(a)(2): Public Improvements (Infrastructure) |  |  | Click here to enter text. |
| Section 105(a)(1): Acquisition of Real Property |  |  | Click here to enter text. |
| Section 105(a)(4): Clearance, Demo, Rehab and Reconstruction (Single family or multifamily) |  |  | Click here to enter text. |
| Section 105(a)(24)(d): Homeowner Assistance (DPA) |  |  | Click here to enter text. |
| Section 105(a)(20): Housing Services  Tenant Rental Assistance |  |  | Click here to enter text. |
| Section 105(a)(7) Disposition of Property |  |  | Click here to enter text. |
| Section 105(a)(12): Planning and Capacity Building – Community Development |  |  | Click here to enter text. |
| Section 105(a)(14) (15) Activities/non-profit organizations |  |  | Click here to enter text. |
| Section 105(a)(17): For-Profit Business Assistance |  |  | Click here to enter text. |
| Section 105(a)(22): Microenterprise Assistance |  |  | Click here to enter text. |
| Other (see below) |  |  | Click here to enter text. |

105(a)(3): Code Enforcement

105(a)(5): Architectural Barrier Removal

105(a)(6): Loss of Rental Income

105(a)(8): Public Services

105(a)(9): Payment of Non-Federal Share

105(a)(10): Completion of Federal Urban Renewal Projects

105(a)(11): Relocation Assistance

105(a)(16): Planning and Capacity Building – Energy Conservation

105(a)(19): Technical Assistance to Public or Nonprofit Entities

105(a)(18): Rehabilitation or Development of Housing

105(a)(21): Assistance to Institutions of Higher Education

105(a)(25): Lead-based Paint Hazard Evaluation and Reduction

**\*Complete this form for each program checklist**

All programs - # of Subrecipients

# of Contracts

# of Activities

# Contracts FULL Monitoring completed

# Checklists uploaded in tracker

# Letters completed and uploaded in tracker

# Contracts PARTIAL Monitoring completed

What percentage of all contracts have been monitored      %

What approach to monitoring does the subgrantee use to determine frequency, responsible org, and timing?



**SECTION II-B**

1. Activity Eligibility and National Objective Review Worksheet\*\*

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR ELIGIBILITY AND NATIONAL OBJECTIVE**

|  |  |  |  |
| --- | --- | --- | --- |
| **Activity Eligibility and National Objective Review Worksheet** | | | |
| **Name of Program** | | | |
| **Name(s) of Reviewer(s)** | Stephanie Morey | **Date** | Click here to enter a date. |

\*\*Reviewer Note: When monitoring for Low/Mod use employee’s income for 1-person household (per HUD waiver), or use Owner income tax for Micro Enterprise (<5 people)

| Name of Recipient, Staff Consulted and Activities Funded | Activity Eligibility determined “OK” by PA?\* | National Objective  LMI or UN | National Objective determined “OK” by PA? | Are data adequate to support determinations? | Do you agree with PA determinations? |
| --- | --- | --- | --- | --- | --- |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |
| Project | Yes No | Choose an item. | Yes No | Yes No | Yes No |

\*PA = Program Administrator designated by the State to deliver the program(s).



**SECTION II-C**

1. Housing Repairs/Reconstruction

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR HOUSING REPAIRS/RECONSTRUCTION**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Is the national objective adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)] or applicable Federal Register notice | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. For single family properties: | |
| 1. If benefiting a low-to-moderate income (LMI) house-hold,does the file document that the household is at or below 80 % of Area Median Income? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If using the Slum/Blight national objective on an Area basis, does the file demonstrate that the area meets the definition of a slum, blighted, deteriorated or deteriorating area under state or local law? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If using the Slum/Blight national objective on a Spot basis, is the rehabilitation *limited* to those conditions that are detrimental to public health and safety? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?  If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)  Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.gpo.gov/fdsys/pkg/FR-2015-05-11/pdf/2015-11284.pdf) / Monday, May 11, 2014] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. For multifamily properties, the LMI national objective should generally be used. | |
| 1. If the structure contains at least two dwelling units, is at least one unit occupied by a LMI household? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:**   |  | | --- | |  | | |
| 1. If the structure contains more than two dwelling units, are at least 51% of the units occupied by LMI households? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?  If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)  Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.gpo.gov/fdsys/pkg/FR-2015-05-11/pdf/2015-11284.pdf) / Monday, May 11, 2014] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder and Larimer Counties:

Take the total sum obligated for Boulder, Weld and Larimer and divide by the total allocation for the program.

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-D**

1. Economic Development

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR ECONOMIC DEVELOPMENT**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities located in a county that was Presidentially declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to an impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does each activity meet the requirements of a special economic development activity?  [[24 CFR 570.203](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1203)]; applicable to entitlement program participants and optional guidance for state program participants] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee or Subrecipient conduct basic financial underwriting prior to providing assistance to a for-profit business?  [[24 CFR 270.209(a)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1209)], applicable to entitlement program participants and optional guidance for state program participants, or [[24 CFR 570.482](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1482)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Is the national objective adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)], or applicable *Federal Register* notice | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. If using the “Creation/Retention of Jobs” for low-to-moderate income (LMI) persons: Is the Subrecipient or Subgrantee using the waiver allowing it to apply individual salaries or wages-per-job, and the income limits, for a household of one? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:**  [Federal Register /[Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf), Tuesday, March 5, 2013] | | |
|  | | |
| If the answer above is “no,” has the program participant (and/or Subgrantee) demonstrated LMI-Jobs using total household income and total household size?  and/or  Is the program participant using “presumed benefit” based on the census tract where the person resides or the business is located for LMI eligibility per [24 CFR 570.483(b)(4)(iv) and/or (v)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483) | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?  If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)    Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.gpo.gov/fdsys/pkg/FR-2015-05-11/pdf/2015-11284.pdf) / Monday, May 11, 2014] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

9.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| **Total Monies Obligated** |  |  |  |  |

Total Obligated to Weld, Boulder and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder and Larimer Counties:

Take the total sum obligated for Boulder, Weld and Larimer and divide by the total allocation for the program.

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-E**

1. Public Improvements

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR PUBLIC IMPROVEMENTS**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county with a Presidentially-declared disaster area? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does each project meet the eligible activity requirements under Section 105(a)(2) of the [Housing and Community Development Act of 1974](https://www.hudexchange.info/resources/documents/Housing-and-Community-Development-Act-1974.pdf)?    [See also [24 CFR 570.201(c)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1201); applicable to entitlement program participants and optional guidance for state program participants] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) or [24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is the national objective adequately documented in the files?     [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)], or applicable *Federal Register* notice] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. For activities meeting the low-to-moderate income area benefit national objective, do the files adquately demonstrate the census tract and block group data (or the survey results if applicable)?   [[24 CFR 570.483(b)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(a)(1)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?   If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)  Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.gpo.gov/fdsys/pkg/FR-2015-05-11/pdf/2015-11284.pdf) / Monday, May 11, 2014] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

OTHER COUNTIES

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

7.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder and Larimer Counties:

Take the total sum obligated for Boulder, Weld and Larimer and divide by the total

allocation for the program.

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-F**

1. Housing New Construction

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR HOUSING NEW CONSTRUCTION**

ELIGIBILITY

1.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has the grantee or its Subgrantees received a waiver allowing it (them) to fund new construction?  [See applicable *Federal Register* notice, [March 5, 2013, Vol.78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf)] | |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |  | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s), i.e., has the grantee or its Subgrantees demonstrated a need for new housing as a result of the disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county with a Presidentially-declared major disaster area? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is the national objective adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)], or applicable *Federal Register* notice] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. For single family properties: If benefiting a low-to-moderate income (LMI) household, does the file document that the household is at or below 80% of Area Median Income?     [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(a)(3)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored?  If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)  Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.fws.gov/endangered/improving_ESA/pdf/Final%20ITS%20Rule%20Federal%20Register%205-11-2015.pdf) / Monday, May 11, 2014] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. For multifamily properties: If the structure contains at least two dwelling units, is at least one unit occupied by a LMI household?   [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(a)(3)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. If the structure contains more than two dwelling units, are at least 51% of the units occupied by LMI households?   Note: Generally, the Urgent Need national objective should not be used for the construction of new multifamily properties, as it is extremely difficult to justify.  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(a)(3)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

7.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder and Larimer Counties:

Take the total sum obligated for Boulder, Weld and Larimer and divide by the total

allocation for the program.

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-G**

1. Acquisition/Buyouts/Relocation

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR ACQUISITION/BUYOUTS/RELOCATION**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

Acquisitions/Buyouts/Relocation

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Are the activities funded under this program eligible under the [Housing and Community Development Act](https://www.hudexchange.info/resources/documents/Housing-and-Community-Development-Act-1974.pdf)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **List the Citation for Eligibility:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVES

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For activities meeting the low-to-moderate income area benefit national objective, do the files adequately demonstrate the census tract and block group data (or the survey results if applicable)?  [[24 CFR 570.483(b)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(a)(1)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If benefiting a low-to-moderate income (LMI) household,does the file document that the household is at or below 80 % of Area Median Income and that the tenant or owner was placed into a decent, safe and sanitary? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If using the Slum/Blight national objective on an Area basis, does the file demonstrate that the area meets the definition of a slum, blighted, deteriorated or deteriorating area under state or local law? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If using the Slum/Blight national objective on a Spot basis, is the rehabilitation limited to those conditions that are detrimental to public health and safety? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?  If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)    Waiver: [Federal Register / [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) / Tuesday, March 5, 2013]  Request for Extension: [Federal Register / [Vol. 80, No. 90](https://www.gpo.gov/fdsys/pkg/FR-2015-05-11/pdf/2015-11284.pdf) / Monday, May 11, 2015] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

GENERAL MANAGEMENT

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does Subgrantee monitor if applicable, Subrecipient’s Residential Anti-displacement and Relocation file? [[24 CFR 42.325](https://www.gpo.gov/fdsys/granule/CFR-2004-title24-vol1/CFR-2004-title24-vol1-sec42-325)]  If Yes, do they check file for the following information?   1. Residential Anti-displacement and Relocation Plan? 2. Resolution adopting the Plan? 3. Residential Anti-displacement/Relocation Certification? 4. If applicable, regulations, information booklets, relocation claim forms? 5. Does the Plan identify a person who is responsible for displacement and relocation compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have policies and procedures for the program being implemented? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

PROPERTY BUYOUTS

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient or Subgrantee conduct property acquisitions for the purpose of mitigating flooding hazards?  If no, skip to question **13.** | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Are the acquisitions of property by the Subrecipient or Subgrantee located in a floodway, floodplain or a designated Disaster Risk Reduction Area and is intended to reduce risk from future flooding?  [Federal Register /[Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) or [Vol. 80, No. 222](https://www.gpo.gov/fdsys/pkg/FR-2015-11-18)]  Colorado Waiver | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the properties dedicated and maintained (restricted deed) in perpetuity for a use that is compatible with open space, recreational, or wetlands management practices? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee or Subrecipient uniformly apply an appropriate valuation method (including the use of pre-flood value or post-flood value as a basis for property value) in using CDBG-DR funds for buyouts? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does restricted deed include a prohibition on new structures being erected on property acquired, accepted or from which a structure was removed under the acquisition or relocation program, other than:   * 1. a public facility that is open on all sides and functionally related to a designated open space (e.g., a park, campground, or outdoor recreation area)?  1. a rest room? 2. a flood control structure? 3. a structure that the local floodplain manager approves in writing before the commencement of the construction of the structure? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does restricted deed include a prohibition on applying for additional disaster assistance for any purpose that will be made by the recipient to any Federal entity in perpetuity with respect to any property acquired, accepted, or from which a structure was removed under the acquisition or relocation program? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

BUYOUT ACQUISITION AND NON-BUYOUT VOLUNTARY ACQUISITION

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee or Subrecipient require the purchase price for any acquisitions with CDBG-DR funds to be based on fair market (post-flood) value in accordance with applicable cost principles?    [*Federal Register* notices published March 5, 2013 and May 29, 2013; applicable to grants under [Public Laws 112-55](https://www.congress.gov/112/plaws/publ55/PLAW-112publ55.pdf) and [113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain a written notification to the seller that the property would not be taken through eminent domain condemnation if negotiations fail (evidence this was monitored for compliance)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| A Notice of Determination of Exemption (Exhibit VI-D) is required to evidence the transaction as voluntary. Is there a signed Notice of Determination of Exemption in the file or evidence this was monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:**  **Exhibit VI-D is a form the state created and can be found in the State CDBG Guidebook.** | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a copy of the signed owner’s acknowledgement of a voluntary acquisition and does it contain the fair market value of the property on file or evidence this was monitored for compliance?  **If there is not a voluntary acquisition acknowledgement the acquisition will not be considered voluntary acquisition.** | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| **Exhibit VI-B is a form the state created and can be found in the State CDBG Guidebook.** | |

21.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Were any tenants or businesses occupying the property at time of acquisition?  Or at the time of the flood?  Or was this monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes, is there evidence occupants were advised of their rights under the URA or was there evidence that this requirement was monitored for compliance? If there were occupants (tenants) answer questions 29-50 related to relocation, if not do not answer questions 29-50 that are related to relocation. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are the following documents on file or monitored for compliance?   1. Identification of property and property owner(s)? 2. The purchase contract and documents conveying the property? 3. The Settlement Statement and evidence the owner received net proceeds? | |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was notification of fair market value provided prior to the signing of a purchase offer or evidence to support this requirement was monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there adequate documentation in the file to support the basis for determining the fair market value or was there documentation to support this requirement was monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Applicable to property donations only

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was an appraisal conducted? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If no, is there a signed waiver of appraisal statement by the property owner(s) or was there evidence this requirement was monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain a copy of the “Notice of Determination of Exemption” (Exhibit VI-D) or evidence this requirement was monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion: Form can be found in State CDBG Program Guidebook.** | |
|  | |

ACQUISITION/INVOLUNTARY

29.

|  |
| --- |
| What is the date of submission of the application for Federal financial assistance, or the date of site control, if later?  Date: Click here to enter a date. |
| **Describe Basis for Conclusion:** |
|  |

30.

|  |
| --- |
| Pursuant to [[49 CFR 24.2(a)(15)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_12), what is the date of “initiation of negotiations”?  Date: Click here to enter a date. |

31.

|  |  |
| --- | --- |
| What activities are being monitored? | |
| 1. Acquisition (including Down-payment Assistance)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Conversion? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Demolition? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Rehabilitation? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

32.

|  |  |
| --- | --- |
| Will the activity(ies) trigger? | |
| 1. URA requirements? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Section 104(d) requirements?   NOTE: The 104(d) requirements were waived if the Subrecipient or Subgrantee has defined demonstrable hardship in their Plan. | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain a Relocation Plan or is there evidence this requirement was monitored for compliance, if applicable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

**MUST ANSWER QUESTIONS 29 THROUGH 50 THAT ARE FOR RELOCATION**

34.

|  |  |
| --- | --- |
| Does the project file contain an occupant roster, current at the time of the flood, including all of the following information or evidence to support monitoring for compliance? (If no current roster is available, indicate below the reason, the date of the latest roster, or whether something other than a roster was used.) | |
| 1. Resident Name? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Household Size? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Household Income? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Unit Size? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Rent/Utility Cost? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain a current occupant list? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a comparison of the occupant lists from the time of flood suggest displacement may have occurred or evidence of monitoring for displacement? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

37.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain an explanation of the reasons any persons vacated between the time of the flood and initiation of negotiations or evidence of monitoring for compliance? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain a copy of a Move-In Notice for all new occupants that moved into the project since application or evidence of monitoring? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

39.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If applicable, does the project file contain an occupant list current at the time of the Initiation of Negotiations or evidence of monitoring? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

40.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain information (i.e., advisory services log, intake form) about the advisory services that will be/have been offered or is there evidence to support that provision of these services were monitored for compliance?  [[49 CFR 24.9(a);](http://www.ecfr.gov/cgi-bin/text-idx?SID=6841d35441597715097a8637dbfcfba7&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_19) [49 CFR 24.205(c)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1205) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

41.

|  |  |
| --- | --- |
| Does the project file contain copies of the following notices or were these requirements monitored for compliance: | |
| 1. General Information Notice and When a Public Agency Acquires Your Property?   [[49 CFR 24.203(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1203) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Notice of Eligibility?   [[49 CFR 24.203(b)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1203) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Non-displacement? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. 90-day Notice?   [[49 CFR 24.203(c)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1203) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. 30-day Notice? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Temporary Relocation? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Interest?   [[49 CFR 24.102(b)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1102) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Intent to Acquire? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain evidence that notices were hand delivered or served registered or certified mail, return receipt requested or evidence that monitoring included reviewing these notices for compliance?  [[49 CFR 24.5]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_15) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the file contain an appraisal or was this requirement monitored for compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

44.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes, was the property appraised by a qualified appraiser prior to negotiations or was this included as a part of the monitoring process? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

45.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the file contain a review appraisal or was there evidence that monitoring included evidence of a review appraisal?  Date of the review: Click here to enter a date. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

46.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the land or property was occupied, was the owner(s) or appointed designee(s) invited to attend the appraisal or evidence that monitoring included checking for compliance of this requirement? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

47.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the file contain a written offer describing the basis for determining just compensation provided to the owner prior to any bargaining or evidence to support an offer describing basis for determining just compensation prior to bargaining?   1. Date of offer: Click here to enter a date. 2. Property purchase price: 3. Date of closing: Click here to enter a date. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

48.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the project file contain signed copies of replacement housing payment claim forms or evidence that the reviewing agency reviewed replacement housing payment claim forms? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Were the amounts paid supported by documentation (i.e., rent receipts, lease, or utility bills for old, comparable or actual replacement unit)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

49.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the project file contain signed copies of moving cost claim forms or did the reviewing agency review these form? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Were the amounts paid supported by documentation (i.e., receipts, estimates, etc.)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

50.

|  |  |
| --- | --- |
| Does the project file contain documentation to support that the following types of replacement housing units are decent, safe and sanitary or evidence this requirement was monitored for compliance? | |
| 1. Comparable replacement unit(s)?   [[49 CFR 24.2(a)(6)(i) and 24.2(a)(8)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_12) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Actual replacement?   [[49 CFR 24.401(a)(2)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1401)] or [[24.402(a)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1402) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Temporary unit? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

51.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee or Subrecipient correctly calculate replacement housing payments for the project being reviewed or is there evidence housing payments were reviewed for compliance by monitoring entity?  [[49 CFR Part 24, subpart E]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#sp49.1.24.e) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

52.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee or Subrecipient correctly calculate the moving and related expense reimbursements for the project being reviewed or evidence to support the moving claim forms were reviewed by the monitoring entity?  [[49 CFR Part 24, subpart D]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#sp49.1.24.d) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

53.

|  |  |
| --- | --- |
| Certification of Legal Residence: [[49 CFR 24.208]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1208) | |
| 1. Did all persons receiving assistance sign a certification of legal residency or was there evidence the reviewing agency monitored for compliance with this requirement?   [[49 CFR 24.208(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1208) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Did persons who did not provide a certification of legal residency or who have been determined to be not lawfully present in the United States, and who received assistance, claim an exceptional and extremely unusual hardship exemption?   (If so, identify below the documentation supporting hardship claim and indicate whether payments were made with HUD funds.) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

54.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Did the Subrecipient or Subgrantee participant promptly review any appeals filed by aggrieved persons in compliance with the requirements of the URA and [49 CFR Part 24] or evidence to support this requirement was monitored for compliance?  [[49 CFR 24.10(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_110) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

55.

|  |  |
| --- | --- |
| Did the Subrecipient or Subgrantee comply with the following requirements or was the program monitored for compliance with the following requirements: | |
| 1. No waiver of relocation assistance be proposed or requested?   [[49 CFR 24.207(f)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1207) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Additional or alternative assistance be provided under the Last Resort housing provisions of the URA when comparable replacement dwellings are not available within the monetary limits for owners or tenants set for in [[49 CFR 24.401(b)](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1401)] and 24.402(a)? Also [[49 CFR 24.404(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1404) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. No part of a relocation payment to a displaced person should be withheld to satisfy an obligation to any other creditor?   [[49 CFR 24.403(a)(6)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1403) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. No displaced person be denied eligibility for a replacement housing payment solely because he/she does not meet the occupancy requirements at [[49 CFR 24.401(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1401) and [[24.402(a)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1402) for a reason beyond his/her control?   Also [[49 CFR 24.403(d)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1403) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Temporary relocation did not extend beyond one year before the person is either returned to his/her previous unit or location or offered permanent relocation assistance?   [[49 CFR 24.2(a)(9)(ii)(D)]](http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_12) | |  |  |  |  | | --- | --- | --- | --- | |  |  | |  | | **Yes** | | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ONE-FOR-ONE REPLACEMENT/DEMOLITION

**Note:** HUD waived the one-for-one replacement for affordable units that were substantially damaged. HUD did not waive the requirements for affordable units that were NOT substantially damaged.

56.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient or Subgrantee demolish units that were not substantially damaged by the flood and affordable at HUD Fair Market Rents?  **If yes, the Subrecipient or Subgrantee must make public by publication in a newspaper** of general circulation the following items and submit to the Department of Local Affairs:   1. a description of the proposed activity, 2. location on a map and number of dwelling units by size that are affected, 3. time schedule for commencement and completion of demolition or conversion, 4. location on a map of replacement dwelling units by size, 5. source of funding and time schedule for replacement (replacement housing must be initially made available for occupancy at any time during the period beginning **one year before** the Subrecipient’s submission of this information and ending **three years after** the commencement of demolition or conversion), 6. basis of ensuring that replacement units will remain low/moderate for at least 10 years from initial occupancy, and 7. if any proposed replacement units are smaller than previous units, information demonstrating that it is consistent with the housing needs of lower-income households in the jurisdiction. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-H**

1. Planning

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR PLANNING**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

4.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |

5.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder and Larimer Counties:

Take the total sum obligated for Boulder, Weld and Larimer and divide by the total

allocation for the program.

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-I**

1. Subgrantee Management (All Subgrantees)

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR SUBGRANTEE MANAGEMENT**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  |  | | --- | --- | | **SUBGRANTEE INFORMATION** |  | | Contract Number | Click here to enter text. | | Subgrantee Name | Click here to enter text. | | Type of Organization | Click here to enter text. | | Name of Program | Click here to enter text. | | Grant Manager | Click here to enter text. | | Date Onsite | Click here to enter text. | |

**DISASTER RECOVERY PROGRAM**

ELIGIBILITY

1.

|  |
| --- |
| What eligible activities are the Subgrantee’s program(s) undertaking through its CDBG-DR award [[24 CFR 570.482](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1482)]? |
| **Describe Basis for Conclusion:** |
|  |

2.

|  |
| --- |
| How does the Subgrantee ensure that its CDBG-DR-funded Subrecipients understand how to apply and meet the CDBG-DR program requirements to the activities that they are carrying out? [[24.CFR 570.503](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8)] |
| **Describe Basis for Conclusion:** |
|  |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there evidence that the Subgrantee has provided appropriate resource materials to its Subrecipients (e.g., governing regulations, OMB Circulars, CPD Notices, the “CDBG Program Guide to National Objectives & Eligible Activities for Entitlement Communities,” or corresponding website addresses) and keeps Subrecipients abreast of program changes and new or revised requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

BUDGET MANAGEMENT

4.

|  |
| --- |
| How much of the Subgrantees CDBG-DR award has been obligated? |
| **Describe Basis for Conclusion:** |
|  |

5.

|  |
| --- |
| How much of the Subgrantees CDBG-DR award remains unobligated? |
| **Describe Basis for Conclusion:** |
|  |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee maintain in its accounting records the amounts budgeted for eligible activities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee include unexpended/unobligated balances for budget categories, as well as obligations and expenditures?  (Budgeted vs Actual to Date) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee periodically compare actual obligations and expenditures to date against planned obligations and expenditures, and against projected accomplishments for such outlays? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

GENERAL PROGRAM MANAGEMENT

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a method to ensure that Subrecipients' financial management systems are kept in accordance with  [[2 CFR 200.302 [formerly 24 CFR 85.20(b) or 24 CFR 84.21(b)(3)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=f8674714cc9db81b4a9ce8a33cb22d71&mc=true&node=se2.1.200_1302&rgn=div8), as applicable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee or its Subrecipient(s) have employees who work on both CDBG-DR-eligible and non-CDBG-DR eligible activities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer above is “yes”, does the Subgrantee or Subrecipient have a system to ensure that the Subrecipient keeps appropriate time distribution records and makes appropriate charges to the CDBG-DR program, as required by [[2 CFR 400](http://www.ecfr.gov/cgi-bin/text-idx?node=pt2.1.400&rgn=div5)] (Subpart E) [formerly OMB Circular A-87, Attachment B, Section 11 (for state, local or Indian tribal governments) and OMB Circular A-122, Attachment B, Section 7 (for non-profit organizations)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee review each Subrecipient for evidence of conflicts of interest, either between the Subgrantee and the Subrecipient or between the Subrecipient and its contractors? (The reviewer may obtain information on the background of Subrecipient staff and/or the Board of Directors, and seek assurances from the Subrecipient when conducting on-site reviews.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee provide its Subrecipient(s) with a standard procurement policy to adopt? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have an adequate understanding of the difference between Subrecipients and Contractors [[2 CFR 200.330](http://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1330&rgn=div8)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee understand that any subawards made by its Subrecipients must also meet the requirements of [[24 CFR 570.503](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] Subrecipient Agreements [questions 23-25 below]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee ensure that Subrecipients maintain and retain adequate records, for a period of not less than three years, to comply with program requirements as set forth at [[2 CFR 200.333](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcb77fc77452ba6106d332d91bf5077f&mc=true&node=se2.1.200_1333&rgn=div8)] [formerly 24 CFR 570.503 and 24 CFR 85.42 or 84.53(b)] as well as any special documentation required by the contract or project activity type? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee ensure that Subrecipients have procedures to adequately identify CDBG-DR property and assets and maintain the appropriate property records, as required by [[2 CFR 200.313 (d)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcb77fc77452ba6106d332d91bf5077f&mc=true&node=se2.1.200_1313&rgn=div8)] [formerly 24 CFR 85.32(d)(1) or 24 CFR 84.34(f)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee ensure that Subrecipients have procedures to ensure adequate safeguards for preventing loss, damage or theft of Subrecipient-held property per [ [2 CFR 200.313 (d)(3)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcb77fc77452ba6106d332d91bf5077f&mc=true&node=se2.1.200_1313&rgn=div8) [formerly 24 CFR 85.32(d)(3) or 24 CFR 84.34(f)(4)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a system for tracking real property under the Subrecipient’s control that was acquired or improved with CDBG-DR funds in excess of $25,000 to assure national objective compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subgrantee and/or Subrecipient have a system for determining the thresholds and applications for Section 3 [Employment and contracting opportunities]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |
| --- |
| What is the Subgrantee’s process for determining whether OMB Circular A-133 Single Audits are required for its Subrecipients? [[24 CFR 85.26](https://www.gpo.gov/fdsys/search/pagedetails.action?packageId=CFR-1998-title24-vol1&granuleId=CFR-1998-title24-vol1-sec85-26&collectionCode=CFR&browsePath=Title+24%2FSubtitle+A%2FPart+85%2FSubpart+C%2FSubjgrp%2FSection+85.26&collapse=true&fromBrowse=true)] |
| **Describe Basis for Conclusion:** |
|  |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a method in place to review Subrecipient’s performance according to their Project Performance Plan (PPP), timeliness, etc.? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SUBRECIPIENT/AGREEMENTS [[24 CFR 570.503](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8)]

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a signed and dated written agreement in effect for every Subrecipient using CDBG-DR funds? [[24 CFR 570.210(c)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1210)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee use a standard agreement for all its Subrecipients? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the written agreement(s) between the Subgrantee and its Subrecipients include the required elements a- g?  [[24 CFR 570.503(b)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. A statement of work, including a description of the work to be performed, a schedule for completing the work, and a budget, all in sufficient detail for performance to be monitored:   [[24 CFR 570.503(b)(1)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4" \l "se24.3.570_1503)   1. Does the SOW describe the purpose and nature of the different services to be offered and where they will be provided? 2. Does the SOW describe or list the tasks to be performed? 3. Does the SOW describe the level of service that will be provided for each activity (identified in some quantifiable unit of service)? 4. Does the schedule for completion provide for in terms of overall duration and cumulative units of service per month or quarter during the agreement period? 5. If items above in number 26 is marked no, does the agreement otherwise provide for measurable objectives and deadlines that will allow for the determination of whether the promised services have been delivered, as well as whether they were delivered on time? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. The records the Subrecipient must maintain and the reports the Subrecipient must submit? [[24 CFR 570.503(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. Does the agreement permit program income to be retained by any of its Subrecipient(s)? [[24 CFR 570.503(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)]  1. If the answer to “c.” above is “yes,” does the agreement specify what activities shall be undertaken with the program income? 2. If the answer to “c” above is “yes,” what information does the Subrecipient or Subgrantee provide to the program participant on program income received and used? 3. If the answer is "no" does the agreement require the Subrecipient(s) to return all program income to the Subgrantee? | |  |  |  | | --- | --- | --- | |  | | | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. Uniform administrative requirements 2 CFR Part 200 [formerly 24 CFR Part 84 or 85, OMB Circular A-87, A-110, A-122]?     [[24 CFR 570.503(b)(4)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. The requirement that the Subrecipient must comply with all Federal laws and regulations described in subpart K of 24 CFR Part 570, either explicit reference to Subpart K or individual provisions? (see box below) [ [24 CFR 570.503(b)(5)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

|  |
| --- |
| [24 CFR 570 Subpart K](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#sp24.3.570.k)  § 570.601 Affirmatively furthering fair housing  § 570.602 Section 109 of the Act. (Civil rights)  § 570.603 Labor standards  § 570.604 Environmental standards  § 570.605 National Flood Insurance Program  § 570.606 Displacement, relocation, acquisition, and replacement of housing  § 570.607 Employment and contracting opportunities.  § 570.608 Lead-based paint.  § 570.609 Use of debarred, suspended or ineligible contractors or Subrecipients  § 570.610 Uniform administrative requirements and cost principles  § 570.611 Conflict of interest  § 570.612 Executive Order 12372  § 570.613 Eligibility restrictions for certain resident aliens  § 570.614 Architectural Barriers Act and the Americans with Disabilities Act |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| * 1. Language indicating that suspension or termination may occur if the Subrecipient materially fails to comply with any term of the award, and that the award may be terminated for convenience?   [[24 CFR 570.503(b)(6)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| * 1. Does the agreement include a Reversion of assets clause?     [[24 CFR 570.503(b)(7)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1503)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SUBRECIPIENT MONITORING

26.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Did the Subgrantee complete a risk assessment for the DR Program? [[24 CFR 570.501](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=7796da456fbd61ba3952571a51e9221c&rgn=div8&view=text&node=24:3.1.1.3.4.10.1.2&idno=24http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=7796da456fbd61ba3952571a51e9221c&rgn=div8&view=text&node=24:3.1.1.3.4.10.1.2)] and [[24 CFR 570.489](https://www.ecfr.gov/cgi-bin/text-idx?SID=d098897e81508415cf8ef9e70c14f306&node=24:3.1.1.3.4.9.1.10&rgn=div8)] | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee monitor any Subrecipients on-site? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Of those monitored on-site, what percentage does this represent of the total number of Subrecipients currently funded by the Subgrantee? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are monitoring results communicated on a timely basis and in writing to Subrecipients? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the program Subgrantee's reports written clearly and do they document the areas monitored and the conclusions reached? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the reports provide any expected corrective actions and dates for resolution? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |
| --- | --- |
| What is the Subgrantee’s internal procedure for ensuring the quality of monitoring efforts, including documentation and intended actions, and follow-through on promised actions? |  |
| **Describe Basis for Conclusion:** | |
|  | |

BENEFICIARY AGREEMENT [2 CFR 200.331(a)(3)](https://www.ecfr.gov/cgi-bin/retrieveECFR?n=se2.1.200_1331) as made applicable to the CDBG program by [24 CFR 570.489(m)](https://www.ecfr.gov/cgi-bin/text-idx?SID=d098897e81508415cf8ef9e70c14f306&node=24:3.1.1.3.4.9.1.10&rgn=div8)

33.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a written agreement between the participating party and the beneficiary?  Does it contain the program requirements for the grant award?    Does it spell out the beneficiary’s and Subgrantee or Subrecipient’s responsibilities?  Does it contain a clause for recapture of funds if program requirements are not met? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| A copy of a written agreement with each landlord or developer receiving CDBG-DR assistance indicating the total number of dwelling units in each multifamily structure assisted and the number of those units which will be occupied by low and moderate income households after assistance? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-J**

1. Duplication of Benefits

DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR DUPLICATION OF BENEFITS

|  |  |
| --- | --- |
| **SUBGRANTEE INFORMATION** | |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**Partnering Agencies are responsible for monitoring the following items for compliance with the CDBG-DR Duplication of Benefits regulations and requirements. If applicable to the project, DOLA’s CDBG-DR Compliance Manager will review the Partnering Agencies’ files to determine if the items below were reviewed for compliance. Check either yes or no to each question below.**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures of the Subgrantee or Subrecipient require all other sources of disaster assistance for the same purpose to be identified and considered to prevent a duplication of benefit (DOB)? [Federal Register / Vol. 76, No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf" \o "IV. Framework for Determining CDBG Disaster Recovery Assistance  B. Total assistance available to the person or entity. Assistance includes all benefits available to the person including cash and other resources such as insurance proceeds, grants, and SBA ) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are applicants for assistance required to disclose the following potential sources of disaster assistance:   1. Insurance? 2. Federal Emergency Management Agency (FEMA)? 3. Small Business Administration? 4. National Flood Insurance Program (NFIP)? 5. Other federal, state, or local funding? 6. Other nonprofit, private sector, or charitable funding?   If not, what justification did Subgrantee have to support the determination? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

Policies and Procedures

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require all beneficiaries or Subrecipients to enter into a signed agreement (e.g., subrogation agreement) to repay any assistance later received for the same purpose as the CDBG-DR disaster recovery funds? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Do the policies and procedures address recapture of CDBG-DR funds (e.g., in case of an overpayment, duplication of benefit)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require the Subgrantee/Subrecipient to comply with HUD’s guidance when assisting applicants that declined SBA assistance to ensure expenditures are for “necessary costs” of recovery, as required by [Public Law 113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf) (and other supplemental appropriations, as applicable)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures include:   1. Identification of the circumstances under which applicants declined assistance? 2. Establishment of why CDBG-DR assistance is appropriate when assisting applicants that declined SBA assistance? 3. Determination of the amount of CDBG-DR assistance that is necessary and reasonable to assist applicants in achieving recovery? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures exclude non-duplicative assistance from the final benefit calculation for the following instances:   1. Provided for a different purpose? 2. Used for a different, eligible purpose? 3. Assistance not available to the applicant? 4. Assistance is a private loan not guaranteed by SBA? 5. Any other asset or line of credit available to the applicant?   [Federal Register / Vol. 76, No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Activity Files (Check for the following when reviewing project files)

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. All sources of assistance provided to each applicant for the same purpose, and the determination of DOB? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. How the DOB determination impacted the applicant’s CDBG-DR award? If a DOB was found, was there a reduction in the award amount? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. That each applicant has entered into a signed agreement (e.g., subrogation agreement) to repay subsequent duplicative assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If a DOB occurred after assistance was awarded, were funds recaptured in accordance with the agreement and the grantee’s policies and procedures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

DOB **Worksheet** for checking Subgrantee’s CDBG-DR Award and DOB determination.

[[Federal Register /Vol. 76 No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf)/ November 16, 2011]

Project File

(1) Identify total post-disaster need prior to any assistance;

(2) Identify potentially duplicative assistance;

* 1. Insurance
  2. Federal Emergency Management Agency (FEMA)
  3. Small Business Administration
  4. National Flood Insurance Program (NFIP)
  5. Other federal, state, or local funding
  6. Other nonprofit, private sector, or charitable funding

Subtotal

(3) Subtract all assistance found to be duplicative, resulting in the maximum potential award amount, or unmet need.

(4) Maximum Eligible Award (Item 1 less item 3)

(5) Program Cap (if applicable)

(6) Final Award (lesser of Items 4 and 5)

Make additional copies for each file sampled



**SECTION II-K**

1. Environmental Review

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR ENVIRONMENTAL REVIEW**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**Partnering Agencies are responsible for monitoring the following items for compliance with the CDBG-DR Environmental Review regulations and requirements. DOLA’s CDBG-DR Compliance Manager will review the Partnering Agencies’ files to determine if the items below were reviewed for compliance. Check either yes or no to each question below.**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a copy of the State’s Environmental Release of Funds on file (For Activity verses Project)?  Complete one form per project or activity as applicable. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| What level of Environmental determination was made for the activity:  Exempt?  Categorically Excluded?  Environmental Assessment-Finding of No Significant Impact? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

**If not exempt complete questions 3-6.**

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have there been any changes in the project’s description since the initial environmental review was completed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to above is “yes”, were the changes significant enough to change the original level of environmental determination? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were there any mitigating measures for projects/activities during the time period reviewed, were the measures included in the ERRs as part of the actions pertaining to the environmental review?  If yes, were the Subrecipients or Subgrantees monitored to ensure the measures were done? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For the records reviewed, do records show that no grant funds were obligated or spent [other than for activities under relocation and approved pre-agreement costs prior to receipt of the [Form HUD-7015.16](https://www.hudexchange.info/resources/documents/HUD-Form-701516-Authority-Use-Grant-Funds.pdf), “Authority to Use Grant Funds” or equivalent? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-L**

1. Procurement/Subgrantee Monitoring

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR SUBGRANTEE PROCURMENT**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**Partnering Agencies are responsible for monitoring Subrecipients for compliance with the CDBG-DR, State and local procurement regulations and requirements. If applicable to the project, DOLA’s CDBG-DR Compliance Manager will review the Partnering Agencies’ monitoring files to determine if the items below were reviewed for compliance.**

CONTRACT ADMINISTRATION (**Review Subgrantee’s Monitoring Files to ensure the Subgrantee is monitoring Subrecipients for compliance with the following items.)**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Subrecipient files to ensure the Subrecipient has a system of contract administration for determining the adequacy of contractors' performance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did Subgrantee ask the Subrecipient if they use prequalified lists?  If the Subrecipient uses prequalified lists, did Subgrantee check if they are current?  Did the Subgrantee check that the list was developed through an open solicitation process without overly restrictive criteria and include an adequate number of qualified sources? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient made subawards? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |
| --- | --- |
| How does the Subgrantee show that its Subrecipients are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders? |  |
| **Describe Basis for Conclusion:** |
|  |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee review Subrecipient’s procurement transactions documentation showing the items listed under questions a-c:  [[2 CFR § 200.318(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&node=se2.1.200_1318&rgn=div8)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

1. Does documentation show what kind of contract(s) is/are being utilized?
2. Fixed Price:

Name of Contractor:

Type of purchase:

1. Cost Reimbursement:

Name of Contractor:

Type of purchase:

1. Time and Materials/Labor Hours

(Prior approval from DOLA after it was determined that no other contract is suitable)

Name of Contractor:

Type of purchase:

1. Basis of contractor selection or rejection?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lowest Price/Cost | Qualifications and Cost | Qualifications |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

1. Basis for the cost or price of the contract?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lump Sum Payment Upon Completion | Unit Price Progress Payments | Reimbursable Costs |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

CONTRACTOR AWARDS

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee monitor the Subrecipient to ensure that its awards are not made to any party excluded, disqualified "or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal “procurement and non-procurement” programs per?  [[24 CFR 570.609](http://www.ecfr.gov/cgi-bin/text-idx?SID=3fbc48b5916df6303bacfc56d7eba909&mc=true&node=se24.3.570_1609&rgn=div8)] [[2 CFR 200.213](http://www.ecfr.gov/cgi-bin/text-idx?SID=b294ec12b6c6eb85670cb1163e739359&mc=true&node=se2.1.200_1213&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Monitor the Subrecipient to ensure noncompetitive contracts were not awarded to consultants that are on retainer contracts or any other arbitrary actions?  [[2 CFR § 200.319 Competition (a) 4-7](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Monitor to ensure that the Subrecipient takes any of the following steps to use small, minority-owned and women-owned businesses?   1. including such businesses on solicitation lists whenever they are potential sources? 2. ensuring that such businesses, when identified, are solicited whenever they are potential sources? 3. dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses? 4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises? 5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce? 6. requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant-funded contracts?   [[2 CFR 200.321](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1321&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  | | | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the Subrecipient is not taking the steps identified in the question above, does the Subgrantee list the actions the Subrecipient is taking to meet [[2 CFR 200.321](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1321)] requirements that affirmative steps be taken to assure use of small, minority-owned and women-owned businesses when possible? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |
| **Describe Basis for Conclusion:** | | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient use a use a cost-plus-a-percentage-of-cost pricing method?  [[2 CFR § 200.323(d)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1323) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Subrecipient’s procurement files for compliance with performing a cost or price analysis for every procurement action, including contract modifications?  [[2 CFR § 200.323(a)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1323) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is profit negotiated as a separate element of price where price competition is lacking or a cost analysis is performed?  [[2 CFR § 200.323(b)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1323)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

METHODS OF PROCUREMENT UTILIZED (Review Subgrantee’s Monitoring Files to ensure that the Subgrantee is monitoring Subrecipients for compliance with the following items,)

What types of Subrecipient CDBG-DR purchases did the Subgrantee review?

Types of Purchases Appropriate Methods

|  |  |  |  |
| --- | --- | --- | --- |
| Construction |  |  | Sealed Bid |
| Supplies |  |  | Small Purchase, Sealed Bid |
| Equipment |  |  | Small Purchase, Seal Bid, Competitive Proposals |
| Professional Services |  |  | Competitive Proposals |
| Other Services |  |  | Small Purchase, Competitive Proposals, Sealed Bid |

Small Purchases [[2 CFR § 200.320 (b)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (b) Procurement by small purchase procedures.  Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more)

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review Subrecipient documentation for an adequate number of receipts for price or rate quotations from qualified sources for procurements of $150,000 or less?  Describe types of purchases and price or rate quotes received. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Micro-Purchases - Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. Micro-purchases may be awarded without soliciting quotations if the non-Federal entity considers the price to be reasonable. [See [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8); [2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8), Micro-purchase.]

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each sample transaction that followed the micro-purchase procurement method, is the micro-purchase within the threshold (currently $3,500 or in the case of acquisitions for construction subject to the Davis-Bacon Act, $2,000) established at [48 CFR Subpart 2.1](https://www.ecfr.gov/cgi-bin/text-idx?SID=f5de816a14575771fbc771be32f32467&mc=true&node=se48.1.2_1101&rgn=div8)?  [[2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8) and [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Sealed Bids [[2 CFR § 200.320(c)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (c) Procurement by sealed bids (formal advertising).  Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all)

15.

|  |  |  |  |
| --- | --- | --- | --- |
| If applicable, did the Subgrantee review the Subrecipient’s formal seal bid process for the following requirements? | | | |
| 1. Does the Subrecipient receive at least two or more responsible bids for each procurement transaction? [[2 CFR § 200.320(c) (1)(ii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. If the answer to “a” above is “no,” did the Subgrantee find this to be a systemic failure (i.e., the Subrecipient’s system" failed to work properly) or does it appear to be isolated failures in some cases? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the procurement transactions lend themselves to firm, fixed price contracts and can selection of known suppliers, be made principally on the basis of price? [[2 CFR § 200.320(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Invitation for Bids to ensure they were publicly advertised and solicited from an adequate number providing them sufficient time before the date set for opening the bids? [[2 CFR § 200.320(c)(1)(i)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "(2) If sealed bids are used, the following requirements apply:  (i) The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for)  IFBs must be advertised for a minimum of 14 calendar days per STATE OF COLORADO PROCUREMENT MANUAL VENDOR SELECTION METHODS-PROCUREMENT RULES: PART 2 OF ARTICLE 103 Part II 4. F. Competitive Sealed Bidding | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the IFBs, including specifications and pertinent attachments, to ensure the IFBs clearly define the items or services?  [[2 CFR 200.320(c)(2)(ii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that all bids were opened publicly at the time and place stated in the IFB? [[2 CFR § 200.320(c)(2)(iii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that contracts were awarded to the lowest responsive and responsible bidders? [[2 CFR § 200.320(c) (2)(iv)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Competitive Proposals [2 CFR § 200.320(d)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Subrecipient to ensure that this procurement method was used generally when conditions are not appropriate for the use of sealed bids? [[2 CFR § 200.320(d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Requests For Proposals (RFPs) to ensure they clearly and accurately state the technical requirements for the goods or services to be procured?  [[2 CFR § 200.319(c)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check to ensure that the proposals were solicited from an adequate number of qualified sources, consistent with the nature and requirements of the procurement?  [[2 CFR § 200.320(d)(2)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee monitor to ensure that the Subrecipient publicizes the RFPs and honor reasonable requests by parties to compete to the maximum extent practicable?  [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the RFPs to ensure they identified all significant evaluation factors, including price or cost where required, and their relative importance?  [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that the Subrecipient:   1. Conducts technical evaluations of submitted proposals?   [[2 CFR § 200.320(d)(3)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Determines responsible bidders from such evaluations?   [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. As necessary, conduct negotiations, written or oral, for final contract award?" | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Make awards to the most responsive and responsible bidders whose proposals will be most advantageous to the Subrecipient after price and other factors are considered?   [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review proposals involving architectural/ engineering professional services to ensure they are evaluated with respect to factors other than price, and that the Subrecipient can document the basis for negotiation of fair and "reasonable compensation? [[2 CFR § 200.320(d)(5)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that for procurement of architectural and engineering professional services, the Subrecipient maintains a list of qualified bidders who can respond to its RFPs?  [[2 CFR § 200.319(d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Non-Competitive Proposals [[2 CFR § 200.320(f)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:  (1) The item is availab)

29.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that if noncompetitive proposals were used, the Subrecipient could show that other methods of procurement (small purchases, sealed bids, formal advertising, or competitive proposals) were "infeasible because?   1. the item was only available from a single source, 2. a public exigency or emergency is of such urgency to not permit a delay resulting "from competitive solicitation, 3. after solicitation of a number of sources, competition is determined inadequate, or 4. DOLA granted approval? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CONTRACTOR AND PAYMENTS

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review purchase orders and contracts to ensure they were signed by an authorized program official? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee check that items delivered and paid for by the Subrecipient are consistent with the items contained in the corresponding purchase order and/or contract? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If contracts have been awarded for construction or facility improvements under the grant program(s) for contracts or subcontracts valued at or below $150,000, did the Subgrantee ensure the following requirements were met?  Does the Subrecipient meet the minimum Federal requirements for:   1. for construction bid guarantees? 2. performance bonds? and 3. payment bonds? | |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For construction contracts or subcontracts valued above $150,000, did the Subgrantee ensure the following requirements were met:  Does the Subrecipient meet the minimum Federal requirements for:   1. bid guarantees of at least 5%, [[2 CFR 200.325(a)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1325" \o "§ 200.325 Bonding requirements.  For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, the Federal awarding agency or pass-through entity may accept the bonding policy and requirements of the non) 2. performance bond, [200.325(b)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1325) 3. payment bonds, [200.325(c)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1325) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34. Did the Subgrantee review Subrecipient’s contract to ensure that the following contract provisions listed in [[2 CFR 200.326](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1326)] were appropriately included in the grant-assisted contracts?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Administrative, contractual, or legal remedies |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Termination for cause and for convenience |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Equal Employment Opportunity |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Davis-Bacon Act |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Copeland “Anti-Kickback” Act |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Contract Work Hours and Safety Standards Act |  | |  |  | |
|  | **Yes** | | **No** | **N/A** | |
| Clean Air Act Federal Water Pollution Control Act | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| Energy efficiency | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| Debarment and Suspension | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| Byrd Anti-Lobbying Amendment | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| Procurement of recovered materials | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |
| Rights to Inventions Made Under a Contract | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | | |

35.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the Subrecipient’s Procurement Policy  [[2 CFR 200.317](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1317)] to ensure the following requirements were included in the policy? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it contain a written code of ethics and/or conflict of interest provisions? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it provide for a system or requirements for contract administration? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it contain a set of principles for open and free competition? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it describe the different types of contracts comparable to the federal classifications [fixed price, cost reimbursement or time and materials]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it describe methods of procurement comparable to the federal methods [at least: Small purchase, Sealed bid, Competitive proposals]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for conducting cost/price analysis? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for conducting or developing independent cost estimates before receipt of bids or proposals?   [[24 CFR 85.36(f)(1)](https://www.gpo.gov/fdsys/pkg/CFR-2011-title24-vol1/pdf/CFR-2011-title24-vol1-sec85-36.pdf)] or [[2 CFR 200.323(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1323&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for negotiating profit? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it set forth bonding and insurance requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for Small, Minority, and Women owned enterprises contract opportunities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for the mandated contract provisions? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |



**SECTION II-M**

12.1 Procurement/Subgrantee‘s Procurements

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**This checklist should be used to review Subgrantees’ procurements. The checklist should not be filled out if the Subgrantee did NOT procure any supplies, services, professional services, construction services, etc.**

CONTRACT ADMINISTRATION **(Review Subgrantee procurement files for compliance with the following items.)**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee have a system of contract administration for determining the adequacy of contractors' performance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee have a written code of conduct governing employees, officers or agents engaged in the award and administration of contracts supported by grant funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| They follow the State Code of Conduct | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did Subgrantee use prequalified lists?  If the answer is yes, were the lists current?  Were the lists developed through an open solicitation process without overly restrictive criteria and include an adequate number of qualified sources? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee’s procurement transactions have the documentation showing compliance with [[2 CFR § 200.318(i)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1318)]? (a-c below) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

1. Does documentation show what kind of contract(s) is/are being utilized?
2. Fixed Price:

Name of Contractor:

Type of purchase:

1. Cost Reimbursement:

Name of Contractor:

Type of purchase:

1. Time and Materials/Labor Hours

(Prior approval from DOLA after it was determined that no other contract is suitable)

Name of Contractor:

Type of purchase:

1. Basis of contractor selection or rejection?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lowest Price/Cost | Qualifications and Cost | Qualifications |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

1. Basis for the cost or price of the contract?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lump Sum Payment Upon Completion | Unit Price Progress Payments | Reimbursable Costs |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

CONTRACTOR AWARDS

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee ensure that its awards are not made to any party excluded, disqualified "or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal "procurement and non-procurement programs per  [[24 CFR 570.609](http://www.ecfr.gov/cgi-bin/text-idx?SID=3fbc48b5916df6303bacfc56d7eba909&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1609)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee award any noncompetitive contracts to consultants that are on retainer contracts or any other arbitrary actions?  [[2 CFR § 200.319 Competition (a) 4-7](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee take any of the following steps to use small, minority-owned and women-owned businesses?   1. including such businesses on solicitation lists whenever they are potential sources? 2. ensuring that such businesses, when identified, are solicited whenever they are potential sources? 3. dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses? 4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises? 5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce? 6. requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant-funded contracts?   [[2 CFR 200.321](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1321&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |
| --- | --- |
| If the Subgrantee is not taking the steps identified in the question above, does the Subgrantee take other actions to meet [[2 CFR 200.321](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1321)] requirements that affirmative steps be taken to assure use of small, minority-owned and women-owned businesses when possible? |  |
| **Describe Basis for Conclusion:** |
|  |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient use a use a cost-plus-a-percentage-of-cost pricing method?  [[2 CFR § 200.323(d)](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1323&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee perform a cost or price analysis for every procurement action, including contract modifications?  [[2 CFR § 200.323(a)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1323) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is profit negotiated as a separate element of price where price competition is lacking or a cost analysis is performed?  [[2 CFR § 200.323(b)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1323)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

METHODS OF PROCUREMENT UTILIZED **(Review the Subgrantees Procurement Files to ensure that the Subgrantee is in compliance with the following items:)**

What types of CDBG-DR purchases did the Subgrantee make?

Types of Purchases Appropriate Methods

|  |  |  |  |
| --- | --- | --- | --- |
| Construction |  |  | Sealed Bid |
| Supplies |  |  | Small Purchase, Sealed Bid |
| Equipment |  |  | Small Purchase, Seal Bid, Competitive Proposals |
| Professional Services |  |  | Competitive Proposals |
| Other Services |  |  | Small Purchase, Competitive Proposals, Sealed Bid |

Small Purchases [[2 CFR § 200.320(b)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (b) Procurement by small purchase procedures.  Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more)

12.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee have documentation of an adequate number of receipts for price or rate quotations from qualified sources for procurements of $150,000 or less?  Describe types of purchases and price or rate quotes received. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Micro-Purchases - Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. Micro-purchases may be awarded without soliciting quotations if the non-Federal entity considers the price to be reasonable. [See [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8); [2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8), Micro-purchase.]

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each sample transaction that followed the micro-purchase procurement method, is the micro-purchase within the threshold (currently $3,500 or in the case of acquisitions for construction subject to the Davis-Bacon Act, $2,000) established at [48 CFR Subpart 2.1](https://www.ecfr.gov/cgi-bin/text-idx?SID=f5de816a14575771fbc771be32f32467&mc=true&node=se48.1.2_1101&rgn=div8)?  [[2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8) and [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Sealed Bids [[2 CFR § 200.320(c)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (c) Procurement by sealed bids (formal advertising).  Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all)

14.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If applicable, did the Subgrantee’s formal seal bid process include the following requirements: | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does the Subgrantee receive at least two or more responsible bids for each procurement transaction?   [[2 CFR § 200.320(c)(1)(ii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. If the answer to “a” above is “no,” did the Grantee find this to be a systemic failure (i.e., the Subgrantees system" failed to work properly) or does it appear to be isolated failures in some cases? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the procurement transactions lend themselves to firm, fixed price contracts and can selection of known suppliers, be made principally on the basis of price? [[2 CFR § 200.320(c)(1)(iii)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the Invitation for Bids publicly advertised and solicited from an adequate number providing them sufficient time before the date set for opening the bids? [[2 CFR § 200.320(c)(1)(i)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "(2) If sealed bids are used, the following requirements apply:  (i) The invitation for bids will be publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for)  IFBs must be advertised for a minimum of 14 calendar days STATE OF COLORADO PROCUREMENT MANUAL VENDOR SELECTION METHODS-PROCUREMENT RULES: PART 2 OF ARTICLE 103 Part II 4. F. Competitive Sealed Bidding | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the IFBs clearly define the items or services?  [[2 CFR 200.320(c)(2)(ii)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were all bids were opened publicly at the time and place stated in the IFB? [[2 CFR § 200.320(c)(2)(iii)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the contracts awarded to the lowest responsive and responsible bidders? [[2 CFR § 200.320(c)(2)(iv)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Competitive Proposals [2 CFR § 200.320(d)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee ensure that this procurement method was used generally when conditions were not appropriate for the use of sealed bids? [[2 CFR § 200.320(d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee’s Requests For Proposals (RFPs) clearly and accurately state the technical requirements for the goods or services to be procured?  [[2 CFR § 200.319(c)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the proposals solicited from an adequate number of qualified sources, consistent with the nature and requirements of the procurement?  [[2 CFR § 200.320(d)(2)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee publicize the RFPs and honor reasonable requests by parties to compete to the maximum extent practicable?    [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review the RFPs to ensure they identified all significant evaluation factors, including price or cost where required, and their relative importance?  [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee:   1. Conduct technical evaluations of submitted proposals?   [[2 CFR § 200.320(d)(3)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Did the Subgrantee determine responsible bidders from such evaluations?   [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. As necessary, conduct negotiations, written or oral, for final contract award?" | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Make awards to the most responsive and responsible bidders whose proposals will be most advantageous to the Subgrantee or Subrecipient after price and other factors are considered?   [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee review proposals involving architectural/ engineering professional services to ensure they are evaluated with respect to factors other than price, and document the basis for negotiation of fair and "reasonable compensation?  [[2 CFR § 200.320(d)(5)](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee maintain a list of qualified bidders who can respond to it RFPs for procurement of architectural and engineering professional services? [[2 CFR § 200.319(d)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Non-Competitive Proposals [[2 CFR § 200.320(f)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1320" \o "(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:  (1) The item is availab)

28.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If noncompetitive proposals were used, did the Subgrantee show that other methods of procurement (small purchases, sealed bids, formal advertising, or competitive proposals) were "infeasible because:   1. the item was only available from a single source, 2. a public exigency or emergency is of such urgency to not permit a delay resulting "from competitive solicitation, 3. after solicitation of a number of sources, competition is determined inadequate, or 4. DOLA granted approval? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CONTRACTOR AND PAYMENTS

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the Subgrantees purchase orders and contracts signed by an authorized program official? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the items delivered and paid for by the Subgrantee consistent with the items contained in the corresponding purchase order and/or contract? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If contracts have been awarded for construction or facility improvements under the grant program(s) for contracts or subcontracts valued at or below $150,000, did the Subgrantee ensure the following requirements were met?  Did the Subrecipient follow its own requirements relating to:   1. for construction bid guarantees? 2. performance bonds? and 3. payment bonds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For construction contracts or subcontracts valued above $150,000, did the Subgrantee comply with the following requirements?   1. bid guarantees of at least 5%, [[2 CFR 200.325(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] 2. performance bond, [[2 CFR 200.325(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] 3. payment bonds [[2 CFR 200.325(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33. Did the Subgrantee’s contract contain the following contract provisions listed in [2 CFR 200.326?](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML" \l "se2.1.200_1326" \o "§ 200.326 Contract provisions.  The non-Federal entity's contracts must contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards.  Appendix II to Part 200—Contract Prov)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Administrative, contractual, or legal remedies | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Termination for cause and for convenience | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Equal Employment Opportunity | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Davis-Bacon Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Copeland “Anti-Kickback” Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Contract Work Hours and Safety Standards Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| Clean Air Act Federal Water Pollution Control Act | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Energy efficiency | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Debarment and Suspension | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Byrd Anti-Lobbying Amendment | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Procurement of recovered materials | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Rights to Inventions Made Under a Contract | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

34. Did the Subgrantee’s Procurement Policy [[2 CFR 200.317](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=918a6df9384bffb5a0fcc2020ffbf034&mc=true&n=sp2.1.200.d&r=SUBPART&ty=HTML#se2.1.200_1317)] contain the following requirements?

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does it contain a written code of ethics and/or conflict of interest provisions? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it provide for a system or requirements for contract administration? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it contain a set of principles for open and free competition? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it describe the different types of contracts comparable to the federal classifications [fixed price, cost reimbursement or time and materials]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it describe methods of procurement comparable to the federal methods [at least: Small purchase, Sealed bid, Competitive proposals]? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it have a provision for conducting cost/price analysis? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for conducting or developing independent cost estimates before receipt of bids or proposals?   [[24 CFR 85.36(f)(1)](https://www.gpo.gov/fdsys/pkg/CFR-2011-title24-vol1/pdf/CFR-2011-title24-vol1-sec85-36.pdf)] or [[2 CFR 200.323(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1323&rgn=div8)] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it have a provision for negotiating profit? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it set forth bonding and insurance requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Does it have a provision for Small, Minority, and Women owned enterprises contract opportunities? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Does it have a provision for the mandated contract provisions? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |



**SECTION II-N**

1. Labor Standards

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR LABOR STANDARDS**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**Partnering Agencies are responsible for monitoring the following items for compliance with the CDBG-DR labor standard regulations. If applicable to the project, DOLA’s CDBG-DR Compliance Manager will review the Partnering Agencies’ files to determine if the items below were reviewed for compliance. Check either yes or no to each question below.**

PAYROLLS

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is a Davis-Bacon wage decision assigned to each covered contract?    [Sec. 3142. Rate of wages for laborers and mechanics](https://www.dol.gov/whd/regs/statutes/dbra.htm) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is the assigned wage decision and HUD-4010, “Federal Labor Standards Provisions,” incorporated into each bid specification and/or contract?  [Fair Labor Standards Act](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain each weekly payroll report from the contractor and sub-contractors, beginning from the construction start through the construction end date or present date (first to current/last)?  [Sec. 3142 C(1) Rate of wages for laborers and mechanics](https://www.dol.gov/whd/regs/statutes/dbra.htm) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| [U.S. DOL Form WH-347 “Statement of Compliance](https://www.dol.gov/whd/forms/wh347instr.htm)”:  Are the payrolls signed by an appropriate principal of the firm?  Do they include a signed “Statement of Compliance” from the contractor?  Have questions 4a and 4b been answered in the “Statements of Compliance”? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have the appropriate wages and fringe benefits been paid?  [Sec. 3141 2(b)](https://www.dol.gov/whd/regs/statutes/dbra.htm)  If no, explain deficiency and what steps have been taken to correct: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Explanation:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are corrected payrolls on file with the Subrecipient? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was time and half paid for all work over 40 hours?  [Fair Labor Standards § 207](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

8.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has an underpayment of over $1,000.00 occurred?  Was an Enforcement Report filed with DOLA? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are there apprentices or trainees on the payroll report?  [Fair Labor Standards Act § 214](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf)  If yes, does the Subrecipient have a copy of the apprentice certification with apprentice’s registration number or the Trainee Program Certification for each trainee or apprentice on the payroll report? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are there additional job classifications on the payroll report that do not appear on the wage determination?  If the answer is yes, is there evidence the Subrecipient requested additional job classifications through DOLA?  If yes, does the Subrecipient’s file contain copies of the approved of additional job classification request wage rates from DOLA? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s file contain evidence that payrolls were reviewed by the Subrecipient in a timely manner to ensure early identification of problems and that correct wages were being paid? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is there a signed Final Statement of Wage Compliance on file? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

INTERVIEWS

13.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Were job-site interviews conducted?  [Chapter 15 HUD Guide Book 15f04](https://www.dol.gov/whd/FOH/FOH_Ch15.pdf) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have copies of each Record of Employee Interview Form documenting interviews? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did interviews record work performed by worker and observed by the interviewer? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were interviews compared with payrolls? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was at least 10% of each job classification interviewed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the ratio of trade skill workers to laborers acceptable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-O**

1. Fair Housing and Equal Opportunity

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR FAIR HOUSING**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

**Partnering Agencies are responsible for monitoring the following items for compliance with the CDBG FHEO regulations and requirements at the Subrecipient level. DOLA’s CDBG-DR Compliance Manager will review the Partnering Agencies’ files to determine if the items below were reviewed for compliance. Check either yes or no to each question below.**

AFFIRMATIVELY FURTHERING FAIR HOUSING (**For Local Government recipients)**

1.

|  |
| --- |
| What actions to affirmatively further fair housing have been taken? |
|  |

TITLE VI, SECTION 109 DATA **(For all grantees, Subgrantees and Subrecipients and any entity that collects applicant and beneficiary data from program applications**)

2.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee or Subrecipient maintain summary data by activity on beneficiaries of, individuals participating in, and/or applicants for the program, broken out by:   1. race and ethnicity; and 2. gender characteristics? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For race and ethnicity, is the Subgrantee or Subrecipient including all the HUD required classes?  American Indian or Alaska Native?  Asian?  Black or African American  Native Hawaiian or Other Pacific Islander?  White?  American Indian or Alaska Native **and** White?  Asian **and** White?  Black or African American **and** White?  American Indian or Alaska Native **and** Black or African American?  Other multiple race combinations greater than one percent?  Balance of individuals reporting more than one race? | |  |  | | --- | --- | | **Yes** | **No** | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |  |  | |
| **Describe Basis for Conclusion:** | |
|  | |

DISPLACEMENT AND RELOCATION

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subgrantee conduct displacement and/or relocation activities?  If yes,  Were there records maintained on households displaced by CDBG-DR-funded activities, which included:   1. race and ethnicity?; 2. gender and single heads of households?; and 3. addresses and census tracts of the housing units to which each displaced household relocated? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SECTION 504 **(Since 1973 All federal grant recipients had to comply with Section 504 in the operation of their federal program; For state and local governments the three policy items [below] are also now mandatory provisions of Title II of the Americans with Disabilities Act [1991])**

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subgrantees with 15 or more employees, is there a formal, written grievance procedure for resolution of complaints alleging discrimination based on disability?  [[24 CFR 8.53(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_153&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subgrantees with 15 or more employees, is there a designated coordinator of the Section 504 responsibilities?  [[24 CFR 8.53(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_153&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subgrantees with 15 or more employees, has it taken appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, that it does not discriminate on the basis of handicap in violation of this part?  [[24 CFR 8.54]](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_154&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ACCESSIBILITY OF NON-HOUSING FACILITIES **(As applicable to the grant program, grantees, Subgrantees and Subrecipients)**

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were CDBG-DR funds used to design and construct new non-housing facilities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes, are the new non-housing facilities being designed and constructed to be readily accessible to, and usable by, persons with disabilities in conformance with accessibility requirements?  [[24 CFR 8.21(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_121&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Were CDBG-DR funds used to make alterations to existing non-housing facilities?  If yes, did such alterations make these facilities usable by, and accessible to, persons with disabilities?  [[24 CFR 8.21(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_121&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

HOUSING **(As applicable to the program for all grantees, Subgrantees and Subrecipients)**

11.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the program involve new housing construction or alteration to existing housing?  Are programs or activities readily accessible to, and usable by, persons with disabilities? (NOTE: A lack of records beyond 3 years is not a basis for a finding.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

COMMUNICATIONS **(Available upon request and as needed to provide access to the program application process and benefits to the program)**

12.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Have steps been taken to ensure effective communication with applicants, beneficiaries, and members of the public who have hearing, vision, or speech impairments using:   1. Qualified sign language and oral interpreters? 2. Readers? 3. Use of tapes? 4. Braille materials? 5. TTD? 6. Other (describe below)?   [[24 CFR 8.6](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.8_16&rgn=div8)] | |  |  |  | | --- | --- | --- | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |
| --- | --- |
| If the answer to all the items above is “no,” describe the method(s) used by the program participant to facilitate effective communication: |  |
|  |

14.

**(As applicable to the program)**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subgrantee or Subrecipient adopted and implemented procedures to ensure that interested persons (including those with impaired vision or hearing) can obtain information concerning the existence and location of accessible services, activities and facilities?  Is there documentation to show steps that the Subgrantee or Subrecipient has undertaken to attract persons with disabilities, such as: making buildings more accessible to persons with physical disabilities; home visits to assist applicants for program benefits in filling out applications; supplying sign language interpreters for public meetings on issues relating to the participant’s programs? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

RECORD KEEPING

15.

**(As applicable to the program)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee or Subrecipient maintain data for compliance purposes showing the extent to which persons with disabilities are beneficiaries of the program(s) being reviewed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

**(If they were done within 3 years, see Question 11 above)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are copies of the Section 504 Self-Evaluation Form and Transition Plan available for review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

**(As applicable to the program)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is a copy of the “Reasonable Accommodation Policy” available for review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SUBRECIPIENTS **(As applicable to the program)**

18.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient make any sub-awards to Subrecipients?  Is there documentation that Subrecipient’ monitor Subrecipients to ensure that Section 504, ADA, and Fair Housing Act requirements affecting persons with disabilities are met? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-P**

15. Temporary Rental Assistance

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR TEMPORARY RENTAL ASSISTANCE**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file provide a description sufficient to demonstrate that the activity is eligible and has been properly classified under Subpart C of Part 570? [[24 CFR 570.488]](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&rgn=div5&view=text&node=24:3.1.1.3.4&idno=24#se24.3.570_1488) refers to [[24 CFR 570.606]](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1606) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

4.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Do all activities reviewed meet a national objective?   [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483) or [24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| 1. Is the national objective for LMH adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)] or applicable Federal Register notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. For direct recipients of CDBG assistance (grants, loans, down payment, etc.) is the grantee using HUD’s most current income guidelines? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **What method of documentation has the grantee used to verify income?** | |
|  | |

PROGRAM MANAGEMENT

5.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| 1. Has the subgrantee established written operating procedures and policies for the program? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| b. If the answer to “a” above is “yes,” does a review of the procedures and policies generally indicate compliance with HUD regulations and policies for relocation assistance? | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | | |
|  | | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a written agreement in place for each subrecipient or entity that carries out homeownership assistance activities on behalf of the Subgrantee?  [[24 CFR 570.503]](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

8.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder, and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder, and Larimer Counties:

Take the total sum obligated for Boulder, Weld, and Larimer and divide by the total allocation for the program.

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goals as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-Q**

16. Tourism

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR TOURISM**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file provide a description sufficient to demonstrate that the activity is eligible and has been properly classified under [Subpart C of Part 570](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=9586b436d31437fe95784567bc97a7e7&mc=true&n=pt24.3.570&r=PART&ty=HTML#sp24.3.570.c)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** DR Tourism promotion as authorized by waiver [Federal Register/Vol. 79, No. 106](https://www.gpo.gov/fdsys/pkg/FR-2014-06-03/pdf/2014-12709.pdf)/Tuesday, June 3, 2014 waiving the requirements of [42 USC 5305(a)](https://www.gpo.gov/fdsys/search/pagedetails.action?sr=4&originalSearch=&st=citation%3A42+USC+5170&ps=10&na=&se=&sb=re&timeFrame=&dateBrowse=&govAuthBrowse=&collection=USCODE&historical=true&granuleId=USCODE-2005-title42-chap69-sec5305&packageId=USCODE-2005-title42&fromState=&collectionCode=USCODE&browsePath=Title+42%2FChapter+69%2FSec.+5305&collapse=true&fromBrowse=true) and providing alternate requirements | |
|  | |

NATIONAL OBJECTIVE

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** Urgent Need ([24 CFR 570.483(d)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1483) as described in Approved Action Plan, 4/28/14, and as provided for in [FRN Vol 79 June 3, 2014](https://www.gpo.gov/fdsys/pkg/FR-2014-06-03/pdf/2014-12709.pdf), page 31970. | |
|  | |

PROGRAM MANAGEMENT

5.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 1. Has the Subgrantee established written operating procedures and policies for the program? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. If the answer to “a” above is “yes,” does a review of the procedures and policies generally indicate compliance with HUD regulations and the waiver requirements of supplanting funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a written agreement in place for each subrecipient or entity that carries out marketing assistance activities on behalf of the Subgrantee?  [[2 CFR 570.503]](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

8.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder, and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder, and Larimer Counties:

Take the total sum obligated for Boulder, Weld, and Larimer and divide by the total allocation for the program.

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION II-R**

1. Down Payment Assistance

**DOLA’s CDBG-DR COMPLIANCE MANAGER’S MONITORING CHECKLIST FOR DOWN PAYMENT ASSISTANCE**

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file provide a description sufficient to demonstrate that the activity is eligible and has been properly classified under Subpart C of Part 570?  [[24 CFR 570.201(n)]](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=24e2036138ee887c7c6daef30d8c7840&ty=HTML&h=L&n=24y3.1.1.3.4&r=PART#se24.3.570_1201) and [[24 CFR 570.506(a)]](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=24e2036138ee887c7c6dae24%20CFR%20570.506(a)f30d8c7840&ty=HTML&h=L&n=24y3.1.1.3.4&r=PART#se24.3.570_1506) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

NATIONAL OBJECTIVE

4.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | | |
|  | | | |
| 1. Is the national objective for LMH adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)] or applicable Federal Register notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| b. For direct recipients of CDBG assistance (grants, loans, down payment etc.) is the grantee using the most current income guidelines? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| What method of documentation has the grantee used to verify income? | | |
| c. If providing DPA to person above LMI is the urgent need national objective being used and are those monies being accounted for under the urgent need national objective? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |

PROGRAM MANAGEMENT

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Has the subgrantee established written operating procedures and policies for the program? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. If the answer to “a” above is “yes,” does a review of the procedures and policies generally indicate compliance with HUD regulations and policies? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee have a written agreement in place for each subrecipient or entity that carries out homeownership assistance activities on behalf of the Subgrantee?  [[24 CFR 570.503]](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

OTHER COUNTIES

7.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is there a process in place to keep track of obligations made to the three most impacted counties (Boulder, Weld, and Larimer) to ensure 80% of the monies allocated are spent in those counties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | | |
| **Describe Basis for Conclusion:** | | |
|  | | |
| b. Based on current obligations does it appear that the 80% will be met? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Boulder** | **Weld** | **Larimer** | **Other** |
| Total Monies Obligated |  |  |  |  |

Total Obligated to Weld, Boulder, and Larimer Counties:

Total Allocation:

Percent Obligated to Weld, Boulder, and Larimer Counties:

Take the total sum obligated for Boulder, Weld, and Larimer and divide by the total allocation for the program.

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the program meeting the overall LMI goal as required by the state (verify the total dollar amount obligated to meet LMI objective)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SECTION III. PARTNERING AGENCY’S TOPIC DESCRIPTIONS AND EXPLANATIONS

The following provides a brief description and explanation of the various partnering agencies’ checklists for the Partnering Agencies use:

Some data items on checklists can be filled out prior to the monitoring visit. The entry of that data prior to the on-site monitoring visit will allow for more time to monitor the project on-site and will alert the Grant Monitors to potential problem areas, if any.

1. National Objective, Disaster Threshold/Eligibility Checklist

This checklist is used to determine CDBG-DR eligibility and National Objective. In addition, the files should contain documentation of a direct or indirect relationship to the disaster. The Grant Monitor must verify the eligibility using FEMA data or other disaster related documentation. Indirect relationship may be based on unemployment data, long term recovery plans, or other suitable justification. The Grant Monitor may need policy guidance from senior policy advisors in unique situations. As stated in earlier narrative, the disaster eligibility is the first action of review. Failure to meet the disaster threshold can result in an ineligible project and require fund reimbursement.

The Grant Monitor must review the Subrecipients’ documentation to support the national objective that the project meets as well as note the HUD citation for CDBG-DR eligibility.

1. Environmental Review

The Grant Monitor should be familiar with the requirements of [24 CFR Part 58](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title24/24cfr58_main_02.tpl) in order to properly validate that the environmental review requirements have been met for each program. DOLA performs the environmental review for all programs with the exceptions of Economic Development, Watershed Planning, and the Boulder County Collaborative program which completes the environmental review for the programs for which they are responsible. Because various entities complete environmental reviews, monitoring for environmental compliance will vary.

There will be different levels of clearance depending on the program being reviewed. All programs should have a complete Environmental Review Record and a Release of Funds, if applicable, on file. Some programs have been determined to be exempt and therefore are not required to have a Release of Funds. If the project is not exempt, the Grant Monitor should review the ERR to ascertain if the environmental review checklist and all supporting documentation are included in the file that support the requirements were followed. Such items may include; SHPO, USFWS and Tribal consultations and concurrences, the Eight-Step Process, maps, and any additional actions and/or documentation that was required by interested parties which commented on the proposed project, including the general public. Again, the type of information or action required will vary depending on the program being monitored and the level of review required for the project.

Always review the scope of work in the approved ERR and compare it to the actual work completed. If the actual location or work varies from the approved location and work in the ERR, further investigation needs to be done as to why the ERR was not amended. The first step is to compare the as-built plans and specifications to the scope of work and map which is included in the approved ERR to ensure that no project sites have changed. It is important to determine whether or not the original ERR was site-specific. If so, and a project site has changed, the ERR would require an amendment. The amended file should include a description of the project changes, new maps that describe the changes, and a re-evaluation of the previous environmental review that may include re-consultation and concurrences from consulting parties. If the ERR was not site-specific (i.e. a tiered review), the monitor must check to see that the actual site was within the area cleared in the ERR in the form of Site Specific Checklists.

Last but not least, costs should not have been incurred prior to the date of the ROF unless pre-agreement costs were approved by the State. The Grant Monitor should review the appropriate documents including program policies and the Action Plan to determine if pre-agreement costs were approved.

1. Financial Management

The review of the recipient’s financial management system is not a formal audit. Its purpose, rather, is to thoroughly check the system in terms of [2 CFR Part 200](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (revised OMB Circulars A-102 and A-87). The financial management checklist is self-explanatory. The checklist is used to assist in determining if the following criteria have been met: the Subgrantee’s financial management system provides for current, accurate, and complete disclosure of financial results; there exists adequate and clear identification of the sources and uses of funds; there exists effective property management and control; the grantee’s records allow for comparison of actual and budgeted amounts activity; there exists procedures for minimizing the time elapsing between the receipt and expenditure of grant funds; and there are procedures in place for determining reasonableness, allowability, and allocability of costs in accordance with State and federal regulations. It is highly recommended that [2 CFR Part 200](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) be reviewed before monitoring and used as a reference item during the monitoring itself.

1. Procurement

The procurement procedures checklist is used to verify that the solicitation and subsequent award of all goods and services contracts were performed in accordance with the procedures established by [2 CFR Part 200](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl) (revised [24 CFR 85.36](https://www.gpo.gov/fdsys/granule/CFR-2011-title24-vol1/CFR-2011-title24-vol1-sec85-36)).

For those grant recipients which have hired a consultant and/or engineer, the contract for each must be reviewed for details (e.g. work requirements, rate of compensation, and nature and amount of other expenses, if any) with the individuals or vendors providing the services and details of actual services performed. A sample of other professional services contracts (appraisers, review appraisers, auditing firms, legal services, etc.) should also be reviewed. All sole source contracts must also be reviewed.

In general, documentation should be reviewed to ensure that: (1) recipients have documentation to justify the method of procurement used to select the provider; (2) cost or price analysis were performed to determine the reasonableness of the contract price; (3) contracts contain clear description of the provider’s duties and responsibilities, and; (4) payments are adequately justified and documented. **REMEMBER HUD REQUIRES THAT, FOR EVERY PROCUREMENT, A DETAILED COST ANALYSIS OR PRICE ANALYSIS MUST BE PERFORMED PRIOR TO THE PROCUREMENT.**

All Subrecipients/Subgrantees that conduct procurement activities are permitted by Federal regulation to use their own procurement procedures as long as they conform to the Federal standards. The required Federal procurement standards for Subrecipients/Subgrantees are included in the Procurement checklist.

1. Fair Housing/Equal Opportunity

The Grant Monitor’s review of Fair Housing/Equal Opportunity is primarily concerned with the Subrecipient’s actions undertaken on its own behalf and that the Grantee and Subgrantee’s have monitored their Subrecipients in the areas of fair housing. There are four specific areas to be reviewed:

* Actions taken to further fair housing,
* Equal employment opportunity practices,
* Section 3 requirements, and
* Section 504 Compliance.

In reviewing the personnel practices, determine whether fair and equitable treatment has taken place with respect to hiring, salary, and promotional opportunities to all applicants and employees. In reviewing Section 3, ascertain if the locality has adopted a written Section 3 plan containing certain criteria and if they are abiding by their plan.

In the area of fair housing, the local government agreed to implement measures to affirmatively further fair housing in their community. Determine whether or not they have implemented a program which addresses this need.

Compliance with the accessibility requirements of Section 504 must also be reviewed.

1. Public Improvements

The review of public infrastructure involves:

* Comparison of work undertaken to the work approved in the application,
* Check for compliance with the State’s Bid Law,
* Detailed review of the bid and contract documents,
* Visit to the construction site, and
* Determination of the progress of construction.

If applicable, the Labor Standards, FHEO and Acquisition checklists should also be completed.

1. Labor Standards

When monitoring labor standards (on-site), the objective is to ensure that the required procedures were implemented in accordance with the statutory regulatory provisions (Davis-Bacon Act, Contract Work Hours and Safety Standards Act, Copeland Anti-Kickback Act, and 29 CFR Parts 1,3,5, and 7). Additionally, the Grant Monitor should promptly advise the entity being monitored to remedy any violations that are disclosed by the monitoring review. The Grant Monitor must check the bid and contract documents for the inclusion of the federal labor standards provisions, the federal wage determination, and the clearance of the contractor/subcontractor. Ensure that the federal wage decision was current at the time of contract execution.

The Grant Monitor must make sure that documentation showing compliance with all federal labor standards requirements has been maintained by the entity during the course of construction. Such documentation should include the contractor/subcontractor signed certifications regarding labor standards/prevailing wages, notices of contract award and preconstruction conference (if applicable), notices to proceed, and preconstruction conference minutes if a pre-construction conference was conducted. The Grant Monitor must ascertain that the federal wage decision, any additional classifications, and the Davis-Bacon poster have been posted at the construction site.

An important task is the review of weekly contractor payrolls. Each contractor and subcontractor must submit weekly payrolls from the time work was started until completion for each week in which work occurred. Each payroll submitted must be accompanied by a “Statement of Compliance” signed by an officer of the company.

In examining the payrolls, verify that only classifications appearing on the wage determination are used, and check for a disproportionate employment of laborers (apprentices or trainees) to mechanics. Wage rates reported on the payroll must be at least equal to the wage decision. If a lesser rate was paid, the entity’s files should include records of restitution made. Payroll computations must be spot-checked; deductions must be reviewed for any non-permissible deductions. The information on the employee interview form should be checked against the wage determination and applicable payroll sheet. You should also check for overtime pay for work in excess of 40 hours in one week.

The enforcement of labor standards provisions is as important as other requirements of the contract specifications, and failure to comply with such labor standards must be corrected by contractors and subcontractors. In addition, failure to comply may result in the imposition of sanctions and penalties.

1. Housing Rehabilitation

Part I of the housing rehabilitation checklist covers the overall program while Parts II and III cover the inspection of a representative sample of individual properties. Part I is self-explanatory.

To complete Parts II and III, you must select properties for an on-site inspection. The number and types of individual property files selected should constitute a representative sample of the entire rehabilitation and reconstruction case inventory, generally 20% but at least one of each type of unit if there are both rehabilitated and reconstructed homes in the project. In addition, any jobs on which the local jurisdiction has received a complaint should be reviewed.

The purpose of making property inspections is primarily to determine if rehabilitation funds were expended for the successful accomplishment of the identified work. If funds being expended are not clearly reflected in the work accomplished, then the Grant Monitor must further investigate to determine the possible cause of the discrepancy.

Once the individual cases have been selected and the Grant Monitor familiarizes himself/herself with the information and documents contained therein, a property inspection should be scheduled with the Subrecipient monitoring visit with adequate notice to the property owner. The owner, or a representative of the owner, should be present at the inspection, particularly the inspection of property interiors.

When disaster funds are used for housing rehabilitation, the units must, at a minimum, be brought up to the Section 8 Housing Quality Standards and Cost Effective Energy Conservation Standards and HUD’s green building retro fit standards. A locality may wish to set higher standards. In monitoring the rehabilitated properties, the Grant Monitor should first review the applicable Standards. Upon site inspection, he/she must determine whether or not these standards have been attained. In addition, the work write-up and change orders must be reviewed to ensure that all work completed was in accordance with the work write-up.

The bidding process for rehab provides an opportunity to promote the participation of small contractors as well as minority and female-owned businesses. The rehab contract itself must include the language and requirements specified in applicable federal, state, and local laws governing the program. Unless rehab is undertaken in a structure with eight or more units, Davis-Bacon and other labor standards provisions do not apply.

1. Housing New Construction

This type of activity is generally ineligible in the traditional CDBG program, but CDBG-DR grants usually allow grantees to construct new housing. The first part of the monitoring checklist deals with the Partnering Agency’s documentation of the eligibility of new housing construction including the disaster recovery justification. The Grant Monitor will have to consider whether the new construction activities can be “tied” to the disaster. The Grant Monitor should look at such things as effects of the disaster on the quality, quantity, and/or affordability of the housing stock, and whether it caused a situation where the housing stock availability was unable to meet post-disaster needs and population demands.

The second part of the new housing checklist considers the possible national objectives the Subgrantees or Subrecipients chose to use for their program. HUD cautions about the appropriateness of using “Urgent Need” for new housing construction. The Grant Monitor should review the justification of Urgent Need carefully.

The Division of Housing has created additional housing monitoring forms for Housing Down Payment Assistance, CDHO CDBG-DR Tenant Files Review, and Housing Repairs. These forms are included as Appendixes 4-6.

1. Acquisitions/Buyouts, Relocation, and Related Actions

The review of clearance/demolition and acquisition/buyouts will cover the review of the locally adopted clearance/demolition policy, anti-displacement plan, and relocation policies and its compliance with DOLA regulations, state, and federal laws and regulations. The Grant Monitor should be fully knowledgeable of the waivers HUD has provided for relocation, one-for-one replacement, and buyouts.

The Grant Monitor’s review of real property acquisition basically covers compliance with the Uniform Act. The Act is very specific about which acquisitions are subject to its requirements and the procedures which must be followed to acquire property. If acquisitions are buyouts, pre-storm or post storm values may be used as long as one type is chosen and used. There can be no mixing of post-storm and pre-storm valuation.

There are three separate components of the review. The first, and probably the more difficult component, requires the Grant Monitor to determine if the acquisition of real property occurred in any part of project costs, and/or if exempt, whether the real property acquisition that occurred was subject to the requirements of the URA. On-site, the Grant Monitor will verify this information with the Subrecipient. Be sure to identify the date on which acquisition activities were initiated. Any non-exempt acquisition initiated after submission of the application must comply with the Uniform Act regardless of the source of funds. Serious acquisition problems arise from acquiring property without meeting the Uniform Act requirements.

Part II of the acquisition checklist involves reviewing the specific acquisitions for parcels under the project. This checklist ensures that proper Uniform Act procedures were followed during the acquisition of each parcel of property.

The review of relocation will cover compliance with the relocation provisions of the Uniform Act. The requirements of the Act are very specific. The first step in completing the checklist is to identify whether or not displacement has occurred. Prior to the site visit, review the Subrecipient’s application, and complete the questions in Part I. Verify this data with the Subrecipient on-site. It is also important to trace non-Uniform Act relocations to ensure compliance with the locally adopted relocation policy.

For those Subrecipients with relocation covered by the Uniform Act, complete Part II for each displacement. For those relocations not subject to the Uniform Act, review the locally adopted displacement policy, and determine whether or not the grantee followed their policy in completing their non-Uniform Act relocation activities.

If demolition of housing occurs on properties acquired by the Subrecipient, monitor for compliance to HUD’s one-for-one replacement policy. All affordable housing, whether owner occupied or tenant occupied, demolished which is not over 50% damaged must adhere to the many requirements of one-to-one replacement.

1. Economic Development (BG&L’s, Tourism)

The review of the economic development portion of the Subgrantee’s files is to ensure that the contractual provisions contained in the Subgrantee’s contract with the Subrecipient have been carried out.

The checklists are used to assist in determining if the following criteria have been met: the number and percent of low/moderate income jobs have been created or retained; the number and percent of low/moderate income businesses and/or employees completed training; marketing and tourism efforts were completed and any measurable outcomes; the assisted business has submitted the required financial reports; the projected sources and uses of funds have been realized; if applicable, the loan has been properly secured and repayments are being made according to schedule, and; program income is being accounted for and properly used.

It is important that the company’s assisted businesses’ financial statements are current and sufficient to verify the stipulations of the contract particularly to demonstrate the supplementing of funds, rather than supplanting.

When funds are used for inventory acquisition, the change in the inventory balance from the pre-assistance period to the current inventory balance on the latest balance sheet should approximate the amount of funds drawn to date. The amount of disaster funds disbursed to the business should approximate the change in total assets (except cash) from the pre-assistance period to the first balance sheet reported after the disaster fund disbursement; otherwise funds could have been diverted to refinance debt. Employment should be verified by comparing the current listing of job titles to the pre-assistance listing of job titles to determine a net increase of new job positions.

When assessing the company’s financial condition, two quick and easy indicators are: comparing the actual gross profit margin (gpm) with the projected gpm and the trend in short term liabilities (especially accrued payroll and tax expenses).

1. Duplication of Benefits

Regardless of the type of program, Federal law requires all funding must be assessed for duplication of assistance received from other sources. The checklist provides a detailed list of the typical forms of assistance that are provided to persons affected by disaster. These include governmental [Federal, State, and local] and non-governmental sources. The Grant Monitor must determine how detailed the Subgrantees and/or Subrecipients were in collecting information from beneficiaries on prior assistance. Typically, CDBG-DR funding is provided after most other assistance has been provided, therefore the Subgrantee and/or Subrecipient would most likely be in the situation of reducing its award of CDBG-DR assistance from the amount requested. The checklist has a worksheet using the duplication of benefits award/reduction formula suggested by HUD in the *Federal Register*.

1. Section 3

The Grant monitor will review the Subrecipient’s efforts in the recruitment, employment, and utilization of local residents and other eligible persons and business by the Subrecipient’s contractors working on contracts partially or wholly funded with the United States Department of Housing and Urban Development (HUD) monies. A review will also consider the subawards and subcontractors who meet the programmatic thresholds. Please review the DOLA CDBG-DR Section 3 Plan for more guidance.

SECTION IV. PARTNERING AGENCY’S MONITORING FORMS



**SECTION IV-A**

1. National Objective

**PARTNERING AGENCY’S CHECKLIST FOR ELIGIBILITY AND NATIONAL OBJECTIVE**

|  |  |
| --- | --- |
| **SUBRECIPIENT INFORMATION** | |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

LOW- AND MODERATE-INCOME

**Area-Wide Benefit**

1.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| SERVICE AREA:  Do the Subrecipient’s records describe the boundaries of the service area? [[24 CFR 570.483(b)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)]  Do you agree with the basis/approach the Subrecipient used in determining the service area of this activity?  [[24 CFR 570.483(b)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)]  Does the size of the service area appear reasonable given the nature and scope of the activity?  [[24 CFR 570.483(b)(1))](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)]  Is the service area “primarily residential?” [[24 CFR 570.483(b)(1)](https://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |
| --- | --- | --- | --- |
| LOW- AND MODERATE-INCOME COMPOSITION OF THE SERVICE AREA:  What do the Subrecipient’s records show as the percent of low- and moderate-income residents in this service area? | |  | | --- | | % | | % | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| LOW- AND MODERATE-INCOME COMPOSITION OF THE SERVICE AREA:   1. Is the percent of low- and moderate-income persons at least 51%? [[24 CFR 570.483(b)(1)(i), (ii), and (vii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] 2. Does the Subrecipient’s documentation show that the correct census data were used and the calculations correctly computed? [[24 CFR 570.483(b)(1)(i),(i) and (ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] 3. If the answer to “b” is “no,” was the Subrecipient authorized to use a survey to qualify the activity? (If the answer is “yes,” proceed to Data and Surveys section of this Checklist, [[24 CFR 570.483(b)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| DATA AND SURVEYS:  If the Subrecipient used a survey rather than the HUD-supplied Census data to determine if a service area qualifies, answer the following:   1. The period for which the income survey of residents of the   service area was determined   1. The year used for HUD income limits: 2. Did the survey show the service area was at least 51 percent low- and moderate-income? 3. If “no” to “c”, did the Subrecipient survey one or more whole block groups? 4. If “yes” to “d”, did the Subrecipient survey all block groups and re-rank them to determine if there was a change in the exception percentage? (If “no,” use of the survey is not acceptable.) 5. If “no” to “d”, did the survey show that the percentage of low- and moderate-income residents was at least equal to or greater than the Subrecipient’s exception percent, but less than 51% low- and moderate-income? (If “no”, the activity does not meet the National Objective.) 6. If a survey was used to determine the percent of low- and moderate-income residents in the service area, did DOLA review the survey instrument and methodology and conclude “that the results meet the standards of statistical reliability that are comparable to that of the decennial census for areas of similar size?” | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity appear to benefit the residents located within the service area, where at least 51% are low- and moderate-income persons? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | 1. If the activity is a facility or service, are fees charged? 2. If “yes”, how much is charged to use the facility or service? 3. If fees are charged, do they appear excessive so as to preclude low- and moderate-income persons from using the facility or service? [[24 CFR 570.200(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1200)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | | | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based upon an **on-site inspection** of the service area/activity location, is there substantial evidence that the activity fails to benefit low- and moderate-income persons in the identified area? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOW/MOD AREA-WIDE BENEFIT Conclusion:

7.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity meet the national objective criteria for serving a low- and moderate-income area? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOW- AND MODERATE-INCOME

**Limited Clientele**

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient using the Limited Clientele National Objective? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

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| --- | --- | --- | --- | --- | --- |
| If yes, which category of Limited Clientele is the Subrecipient using?   1. Presumed Benefit 2. Family size and Income 3. Low-moderate income eligibility restrictions 4. Nature and Location | |  | | --- | |  | |  | |  | |  | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| a. PRESUMED BENEFIT Limited Clientele  If the activity is classified as presumed benefit, do the program participant’s files have documentation showing that the activity is limited to one or a combination of the eight population segments presumed to be low- and moderate-income by HUD:   1. abused children? 2. battered spouses? 3. elderly persons? 4. adults meeting the Bureau of the Census’ Population 5. Report’s definition of “severely disabled” (current for the   time period of this review)?   1. homeless persons? 2. illiterate adults? 3. persons living with AIDS? 4. migrant farm workers?   [[24 CFR 570.483(b)(2)(ii)(A)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(3)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  |  |  | | --- | --- | --- | --- | --- | | |  | | --- | |  | |  | |  | |  | | | |  | | --- | |  | |  | |  | |  | |  | | |

11.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| b. FAMILY SIZE AND INCOME Limited Clientele:  If the activity is classified under family size and income, does the Subrecipient’s files have documentation showing that at least 51% of the beneficiaries are members of a low- and moderate-income family?  [[24 CFR 570.483(b)(2)(ii)(B)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| c. Income Eligibility Restrictions Limited Clientele:  If the activity is classified based on income eligibility requirements that restrict it exclusively to low- and moderate-income persons, do the Subrecipient’s files have documentation to support that all persons benefiting are low- and moderate-income?  [[24 CFR 570.483(b)(2)(ii)(C)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity was classified based on income, were the appropriate Section 8 income limits used by the Subrecipient when checking the income of the persons served (the correct year and the correct family size)? [24 CFR 570.3](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_13), [24 CFR 208(a)(2)(i)(B) or (C),](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1208) and  [[24 CFR 570.506(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |
| --- | --- |
| How is information on the income status of participants being requested, updated or properly assessed? |  |
| **Describe Basis for Conclusion:** |
|  |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| d. NATURE AND LOCATION Limited Clientele:  If the activity is classified based on the nature and location of the activity, does the Subrecipient’s files have documentation to support that the beneficiaries are predominately low- and moderate-income?  [[24 CFR 570.483(b)(2)(ii)(D)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(3)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based upon an **on-site inspection** of the facility/service, is there evidence to indicate that this activity predominately or exclusively benefits low- and moderate-income persons, based upon the category of presumed benefit selected by the Subrecipient?  [[24 CFR 570.483(b)(2)(ii)(D)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOW/MOD LIMITED CLIENTELE Conclusion:

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the activity properly classified as limited clientele? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOW- AND MODERATE-INCOME

**Housing**

Classification and Property Information:

18.

|  |
| --- |
| Which eligibility category ([570.201 – 570.204](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#sp24.3.570.c)) was used by the program participant to classify the activity? |
| **Describe Basis for Conclusion:** |
|  |

19.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| a. Does the property contain existing housing units or structures? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| If the property has no structures, describe how the program participant will ensure that the national objective criteria will be met when the property is developed.  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(v)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |
| **Describe Basis for Conclusion:** | |
|  | |

Written Agreements:

(Note: If the activity involves only owner-occupied housing, skip to next section.)

20.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 1. Has the program participant entered into a written agreement with a landlord or developer receiving CDBG assistance for development of the property?     [[24 CFR 570.506(b)(4)(i)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the written agreement indicate the total number of dwelling units in each structure and the total number of units that will be occupied by low- and moderate-income households following the completion of the assisted activity?  [[24 CFR 570.506(b)(4)(i)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. Does the program participant have a reporting mechanism to ensure that the activity will comply with the occupancy requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Owner-Occupied Structures:

21.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve owner-occupied structures? (If “no”, skip to next section Rental Structures.) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the documentation show that each assisted structure met the requirements for occupancy by low- and moderate-income **HOUSEHOLDS**?  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [570.506(b)(4)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. Was income eligibility determined by projecting annual household income (as required at [24 CFR 570.3](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#sp24.3.570.d)) and using one of the following three methods:  (1) The Section 8 “annual income” definition at [24 CFR 5.609](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div8&node=24:1.1.1.1.5.6.17.3); (2) The Census Long-Form definition; or  (3) The “adjusted gross income” from IRS Form 1040? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| d. Were the appropriate Section 8 income limits and household size used to determine if the unit was occupied by a low- and moderate-income household?  [[24 CFR 570.506(b)(4)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Rental Buildings:

22.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve rental buildings? If “no”, skip to next section Multifamily Structures. | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. Does the program participant’s documentation contain the amount of rent charged (or to be charged for unfinished projects) after assistance for each dwelling unit occupied by a low- and moderate-income household in each assisted structure?  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(iv)(A)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. Does the program participant’s documentation contain the affordable rents criteria?  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(iv)(A) and (B)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Do the rents for the units occupied by low- and moderate-income households meet the program participant’s affordability standard?   [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(iv)(B)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there more than one rental building being assisted? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. If the response to “6.a.” above is “yes,” is the program participant treating the two or more rental buildings as one structure? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. If the response to “6.b.” above is “yes,” are the buildings:   * under common ownership and management AND * located on the same or contiguous properties?   [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the documentation show that at least 51 percent of the rental units were initially occupied by low- and moderate-income households?  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Multi-Family Structures:

25.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve multi-family structures? (If “no”, skip to next section Report Validation and Verification.) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |
| b. If the assisted activity is a two-unit structure, was at least one unit initially occupied by a low- and moderate-income household?  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. For structures with more than two units, complete the following table:  |  |  |  |  |  | | --- | --- | --- | --- | --- | |  | Structure Name or Address/Number | Number of Units in Structure | Number of Units Occupied by L/M Households | % of Units in Structure Occupied by L/M Households | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | | |
| d. For “c” above, were at least 51 percent of the units initially occupied by low- and moderate-income households? **Note**: If the answer to this question is “no,” but there is evidence that the activity meets the criteria in “e” below, a finding **cannot** be made. If the answer is “yes,” ensure that the recipient maintains documentation showing the family size and household income for the identified Low/Mod units.  [[24 CFR 570.208(a)(3)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(iii)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If less than 51 percent of the initial occupants were low and moderate income, does the activity meet ALL of the following requirements: 2. The CDBG assistance was used to reduce the development cost of the new construction of a multi-family, non-elderly rental housing project; **and** 3. At least 20% of the units are (or will be) occupied by low- and moderate-income households at affordable rents; **and** 4. The proportion of the CDBG funding is not greater than the percentage of low- and moderate-income units?   Calculate compliance for “iii” above as follows:   * 1. Total development cost of the activity (including CDBG funds):      \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   2. Amount of CDBG funds:      \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_   3. Proportion CDBG represents of total development cost (2 ÷ 1):      %   4. Percentage of units in the project occupied by low-   and moderate-income households:      %  If the percentage on line 4. is greater than or equal to the percentage on line 3., the activity meets the low- and moderate-income housing national objective under 570.208(a)(3)(i).  [[24 CFR 570.208(a)(3)(i)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) and [24 CFR 570.506(b)(4)(vi)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SLUM AND BLIGHT

**Area Slum and Blight**

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s files clearly describe the geographical boundaries of the designated area for the activity?  [[24 CFR 570.483(c)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(8)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| When was the area designated as a slum, blighted, deteriorated or deteriorating area?  [[24 CFR 570.483(c)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(8)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  |  |  | | --- | --- | --- | --- | --- | | Click here to enter a date. | | |  |  | |  |  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s file documentation identify the state or local law that contains the definition of a slum, blighted, deteriorated or deteriorating area used to qualify the area?  [[24 CFR 570.483(c)(1)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR §570.506(b)(8)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the area qualified on the basis of deteriorated or deteriorating buildings? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If “yes” to question above, is there documentation showing that the area, at time of designation, had a substantial number of deteriorating or deteriorated buildings?  [[24 CFR 570.483(c)(1)(B)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the percentage of deteriorated or deteriorating buildings in the area was less than the proportion specified in the State law or 25%, how did the participant qualify the area on this basis? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the area qualified on the basis of the condition of the public improvements (e.g., streets, sidewalks) in the area?  [[24 CFR 570.483(c)(1)(B)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If “yes” to the question above, is there documentation to show that the public improvements throughout the area were in a general state of deterioration?  [[24 CFR 570.483(c)(1)(B)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the documentation show that the conditions in the area satisfy the state or local law requirements for a slum or blighted area at time of designation?  [[24 CFR 570.483(c)(1)(iv)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based upon an inspection of the area and Subrecipient files, is there any evidence that would call into question that the area is, or was, slum/blighted at the time of designation? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Residential Buildings:

36.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Has the Subrecipient funded, or does it intend to fund, residential buildings rehabilitated under the slum and blight area national objective? (If “no”, skip to Area SB Conclusion) 2. If the answer to the question above is “yes,” does the Subrecipient have a local definition of “substandard” housing conditions?   [[24 CFR 570.483(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(9)(i)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5" \l "se24.3.570_1506)   1. If the answer to the question above is “yes,” at a minimum, does a property meeting the local definition of substandard also fail to meet the housing quality standards for the Section 8 Housing Assistance Payment Program at   [[24 CFR 882.109] and](https://www.gpo.gov/fdsys/pkg/CFR-1998-title24-vol4/pdf/CFR-1998-title24-vol4-sec882-109.pdf) [[24 CFR 570.483(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

37.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the program is funding residential buildings, does a review of a sample of files show documentation, by structure, that includes:   1. How the building met the local definition of “substandard?” 2. A pre-rehabilitation inspection report describing all deficiencies in the structure to be rehabilitated? 3. Details and scope of the CDBG-DR-assisted rehabilitation? 4. Information to show that the deficiencies making the unit substandard were eliminated prior to less critical work on the structure?   [[24 CFR 570.483(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(9)(ii) and (iii)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506) | |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

AREA SLUM AND BLIGHT Conclusion:

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity/do the activities assisted under this national objective address one or more of the conditions which contributed to the deterioration of the area?  [[24 CFR 570.483(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SLUM AND BLIGHT

**Spot Slum and Blight**

39.

|  |
| --- |
| What activity did the Subrecipient carry out under this national objective? |
| **Describe Basis for Conclusion:** |
|  |

40.

|  |  |
| --- | --- |
| Does this activity fall into one or more of the five eligible categories under the spot slums or blight national objective? Check all that apply.  acquisition,  clearance,  relocation,  historic preservation,  and/or building rehabilitation activities?  [[24 CFR 570.483(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] |  |
| **Describe Basis for Conclusion:** | |
|  | |

41.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file documentation describe the specific condition of blight or physical decay that the activity eliminates?  [[24 CFR 570.483(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(10)(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity involved rehabilitation of a building, other than a historic property, was the CDBG-DR-assisted work limited to conditions detrimental to public health and safety?  [[24 CFR 570.483(c)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483) and [[24 CFR 570.506(b)(10)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity is rehabilitating a building, does the file documentation identify the specific conditions detrimental to public health and safety and the details and scope of the CDBG-DR-assisted rehabilitation by structure?  [[24 CFR 570.506(b)(10)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SPOT SLUM AND BLIGHT Conclusion:

44.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based upon an **on-site inspection** of the activity, does it appear to meet the restrictions for eliminating specific conditions of blight or physical decay on a spot basis not located in a slum or blighted area?  [24 [CFR 570.483(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] and [[24 CFR 570.506(b)(10)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

URGENT NEED

45.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Did the Subrecipient address the type, scale, and location of the disaster-related impact(s) that the funded activity? 2. Did the Subrecipient document how the funded activity responded to the disaster-related impact identified in the Action Plan? [Federal Register Vol. 78, No.43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

46.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the waiver expired prior to the activity commencing, is the urgency of the need adequately demonstrated in compliance with requirements at [24 CFR 570.208(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1208) and [24 CFR 470.483(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483) or was an extension requested?  [Federal Register Vol. 78, No.43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

47.

|  |
| --- |
| What activity was/activities were assisted with CDBG-DR funds? |
|  |

URGENT NEED Conclusion:

48.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity was inspected, is there any substantial evidence to the contrary that would indicate that the CDBG-DR-assisted activity/activities did not alleviate a threat to the community’s health or welfare?  [[24 CFR 570.483(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-B**

1. Environmental Review

**PARTNERING AGENCY’S CHECKLIST FOR ENVIRONMENTAL REVIEW**

|  |  |
| --- | --- |
| **SUBRECIPIENT INFORMATION** | |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a copy of the State’s Environmental Release of Funds on file? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| What level of Environmental determination was made for the activity:  Exempt?  Categorically Excluded?  Environmental Assessment-Finding of No Significant Impact? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

**If not exempt complete questions 3-6.**

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have there been any changes in the project’s description since the initial environmental review was completed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to above is “yes”, were the changes significant enough to change the original level of environmental determination? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If mitigating measures were required for projects/activities during the time period reviewed, were the measures included in the ERRs as part of the actions pertaining to the environmental review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For the records reviewed, do the Responsible Entities (RE) records show that no grant funds were obligated or spent [other than for activities under [[24 CFR 58.22(f)](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.58_122&rgn=div8), [24 CFR 58.34](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.58_134&rgn=div8), or [24 CFR 58.35(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.58_135&rgn=div8) prior to receipt of the [Form HUD-7015.16](https://www.hudexchange.info/resources/documents/HUD-Form-701516-Authority-Use-Grant-Funds.pdf), “Authority to Use Grant Funds” or equivalent? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-C**

1. Financial Management

**PARTNERING AGENCY’S CHECKLIST FOR FINANCIAL MANAGEMENT**

|  |  |
| --- | --- |
| **SUBRECIPIENT INFORMATION** | |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

BUDGET CONTROL

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient record amount budgeted for eligible activities as specified in [24 CFR 570, Subpart C](https://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#sp24.3.570.c)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient record an encumbrance/obligation when contracts are executed, purchase orders issued, etc.? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient identify expenditures in its accounting records according to eligible activity classifications specified in the statute, regulations, or grant agreement that clearly identify the use of program funds for eligible activities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ACCOUNTING RECORDS

FINANCIAL MANAGEMENT SYSTEM

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient, if applicable, maintained a properly segregated account of CDBG-DR funds from other funds which document revenues and expenditures associated with the project or have an accounting system sufficient to account for commingling of funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the record review indicate any instances of ineligible expenditures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CASH MANAGEMENT

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the Subrecipient requests funds in advance, does the participant minimize the time elapsed between the transfer of funds from the U.S. Treasury and disbursement by the participant? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the Subrecipient advances grant funds to Subrecipients, does the participant have procedures to minimize the time elapsed between the transfer of funds to, and disbursement by, the Subrecipients? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If grant advances are deposited into an interest-bearing account, what provisions have been made for return of interest income to the State or HUD? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments?  [2 CFR 200.305(b)(5)](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1305&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ALLOWABLE COSTS

Recipient Administration and Program Delivery Charges

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are charges to the CDBG-DR program for salaries and wages, whether treated as direct or indirect costs, based on payrolls documented in accordance with the generally accepted practice of the governmental unit (or legal entity) and approved by a responsible official(s) of the governmental unit (or legal entity)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

For Governmental Recipients:

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For employees working solely on the CDBG-DR program, are charges for their salaries and wages supported by periodic certifications that the employees worked solely on that program for the period covered by the certification? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the certifications prepared at least semi-annually and signed by the employee or a supervisory official having first-hand knowledge of the work performed by the employee? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

For non-Governmental Subgrantee or Subrecipients or Governmental personnel not working full time on CDBG-DR:

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the personnel time records account for all the employees' time and activities and not just the CDBG-DR time charged? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Indirect Costs

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are indirect costs charged to the program?  If yes, what method is being used:  Ten Percent de Minimis  Cost Allocation Plan  Indirect Cost Rate  Direct Allocation Method | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are indirect costs billed in accordance with an approved method? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Internal Controls

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Review Subgrantee’s, and if applicable, the Subrecipient’s system for pay authorizations, processing invoices for approval and payment to include who approves payment requests, who prepares checks, and who signs checks. Is the process adequate? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have an organization chart that sets forth the actual lines of responsibility? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are duties for key employees of the Subrecipient defined? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient obtained fidelity bond or Director and Officers (D&O) coverage for responsible officials? [[2 CFR 200.304(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=0caf094a996036c52f8ce8b4db68ffbb&mc=true&node=se2.1.200_1304&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s chart of accounts include a complete listing of the account numbers used to support the control needed to ensure that resources used do not exceed resources authorized? [2 CFR 200.302(B)(1),(4)](https://www.ecfr.gov/cgi-bin/text-idx?SID=b609f78d00e5ea5c43f19629d30420b6&mc=true&node=se2.1.200_1302&rgn=div8) Examples: dual signatures, budget vs. actual reports | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s approval controls provide reasonable assurance that appropriate individuals approve recorded transactions in accordance with management’s general or specific criteria? “do they follow their policies and procedures” | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s controls over the design and use of documents and records provide reasonable assurance that transactions and events are properly documented, recorded, and auditable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s segregation of duties controls effectively reduce the opportunity for someone to perpetrate or conceal errors or irregularities in the normal course of duties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is it clear that all personnel are responsible for communicating upward the Subrecipient’s operating problems and noncompliance with laws and regulations? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s internal control procedures support its ability to prepare financial statements that are fairly presented in conformity with generally accepted or other relevant and appropriate accounting principles and regulatory requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Source Documentation

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee, and if applicable, the Subrecipient’s file contain appropriate supporting documentation for CDBG-DR draw down requests? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient maintain adequate source documentation? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| To determine compliance, select a sample of expenditures and determine whether they are supported by invoices, contracts, or purchase orders, etc. (if all RFR are reviewed and approved by the staff and Program Manager at DOLA, answer N/A and put the reason below in basis for conclusion. If N/A, skip #29) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29. Provide four (4) examples of expenditures reviewed for this contract:

Payee:

Date of Invoice: Click here to enter a date.

Amount:

Invoice #:

Reimbursement Amount:

Check #:

Payee:

Date of Invoice: Click here to enter a date.

Amount:

Invoice #:

Reimbursement Amount:

Check #:

Payee:

Date of Invoice: Click here to enter a date.

Amount:

Invoice #:

Reimbursement Amount:

Check #:

Payee:

Date of Invoice: Click here to enter a date.

Amount:

Invoice #:

Reimbursement Amount:

Check #:

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30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient, and if applicable, subawards subject to the Single Audit Act? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If an audit was required, were there any deficiencies/findings noted in the most recent audit completed? If yes, describe deficiency: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s audit report include an opinion on whether the financial statements are presented fairly in all material respects in conformity with GAAP and whether the schedule of expenditures is presented fairly in all material respects? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s financial statements reflect its financial position, results of operations or changes in net assets and, where appropriate, cash flows for the fiscal year? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Program Income

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are revenue-generating activities (e.g., rehabilitation, economic development loans) being undertaken? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the project earned program/miscellaneous income, which is to be committed to a Revolving Loan Fund (RLF)?  (If answer is no, skip to question 38). | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the RLFs held in a separate account? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

37.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the RLF appropriately been used for the approved activity from which it was generated? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Upon expiration of any agreements between the Subrecipient and/or pass-through entity, does the Subrecipient have a system for ensuring:   1. the timely and accurate transfer of any funds to be returned to the participant;   and/or   1. the timely and accurate transfer of outstanding loans or accounts receivable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Loan Servicing

39

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the Subgrantee or Subrecipient provides loans, does it have a system for properly servicing all CDBG-DR-assisted loans (including deferred payment loans and revolving loan funds) that includes:  Written loan agreements that clearly describe the repayment terms, what constitutes a default and how it can be cured, what actions the Subgrantee or Subrecipient will take if the default is not cured, and (if applicable) and what is pledged as security for the loan? | |  |  |  | | --- | --- | --- | |  | | | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

40.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subgrantee or Subrecipient have in place collection procedures that provide for the recognition of all current amounts due, payments received, notification to borrower when payments are overdue, a process for taking further action on defaulted loans, and criteria for writing off bad debts? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-D**

1. Procurement

**PARTNERING AGENCY’S CHECKLIST FOR FINANCIAL MANAGEMENT**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

CONTRACT ADMINISTRATION

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Can the Subrecipient document a system of contract administration for determining the adequacy of contractors' performance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have a written code of conduct governing employees, officers or agents engaged in the award and administration of contracts supported by grant funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient use prequalified lists?  If yes, are such lists current?  Developed through an open solicitation process without overly restrictive criteria and include an adequate number of qualified sources? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient made subawards? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |
| --- | --- |
| If subawards made, how does the Subrecipient show that its Subrecipients are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders? |  |
| **Describe Basis for Conclusion:** |
|  |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For the procurement transactions selected for review, is there documentation showing compliance with [[2 CFR § 200.318(i)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1318)? (a-c below)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

1. Does documentation show what kind of contract(s) is/are being utilized?
2. Fixed Price:

Name of Contractor:

Type of purchase:

1. Cost Reimbursement:

Name of Contractor:

Type of purchase:

1. Time and Materials/Labor Hours

(Prior approval from DOLA after it was determined that no other contract is suitable)

Name of Contractor:

Type of purchase:

1. Basis of contractor selection or rejection?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lowest Price/Cost | Qualifications and Cost | Qualifications |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

1. Basis for the cost or price of the contract?

|  |  |  |  |
| --- | --- | --- | --- |
|  | Lump Sum Payment Upon Completion | Unit Price Progress Payments | Reimbursable Costs |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |
| Name of Contractor: |  |  |  |

CONTRACTOR AWARDS

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient ensuring that its awards are not made to any party excluded, disqualified "or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal procurement and non-procurement programs per [[24 CFR 570.609]?](http://www.ecfr.gov/cgi-bin/text-idx?SID=cec42cf0d32eccf2bcea092f490ced3e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1609) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there any evidence to indicate that the Subrecipient awarded noncompetitive contracts to consultants that are on retainer contracts or any other arbitrary actions? [[2 CFR § 200.319 Competition (a) 4-7]](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1319) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient take any of the following steps to use small, minority-owned and women-owned businesses?   1. including such businesses on solicitation lists whenever they are potential sources? 2. ensuring that such businesses, when identified, are solicited whenever they are potential sources? 3. dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses? 4. establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises? 5. using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce? 6. requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant-funded contracts?   [[2 CFR 200.321](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1321)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |
| --- | --- |
| If the Subrecipient is not taking the steps identified in the question above, list the actions the Subrecipient is taking to meet [[2 CFR 200.321](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1321)] requirements that affirmative steps be taken to assure use of small, minority-owned and women-owned businesses when possible. |  |
| **Describe Basis for Conclusion:** |
|  |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were any contracts based on a cost-plus-a-percentage-of-cost method? [[2 CFR § 200.323(d)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1323) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was a cost or price analysis performed in connection with every procurement action, including contract modifications? [[2 CFR § 200.323(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1323) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is profit negotiated as a separate element of price where price competition is lacking or a cost analysis is performed? [[2 CFR § 200.323(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1323)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

METHODS OF PROCUREMENT UTILIZED

What purchases did the Subrecipient conduct with grant funds?

Types of Purchases Appropriate Methods

|  |  |  |  |
| --- | --- | --- | --- |
| Construction |  |  | Sealed Bid |
| Supplies |  |  | Small Purchase, Sealed Bid |
| Equipment |  |  | Small Purchase, Seal Bid, Competitive Proposals |
| Professional Services |  |  | Competitive Proposals |
| Other Services |  |  | Small Purchase, Competitive Proposals, Sealed Bid |

Small Purchases [2 CFR § 200.320(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (b) Procurement by small purchase procedures.  Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more)

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Can the Subrecipient document receipt of an adequate number of price or rate quotations from qualified sources for procurements of $150,000 or less?  Describe types of purchases and price or rate quotes received. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Micro-Purchases - Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. Micro-purchases may be awarded without soliciting quotations if the non-Federal entity considers the price to be reasonable. [See [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8); [2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8), Micro-purchase.]

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each sample transaction that followed the micro-purchase procurement method, is the micro-purchase within the threshold (currently $3,500 or in the case of acquisitions for construction subject to the Davis-Bacon Act, $2,000) established at [48 CFR Subpart 2.1](https://www.ecfr.gov/cgi-bin/text-idx?SID=f5de816a14575771fbc771be32f32467&mc=true&node=se48.1.2_1101&rgn=div8)?  [[2 CFR 200.67](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_167&rgn=div8) and [2 CFR 200.320(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Sealed Bids [[2 CFR § 200.320(c)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5" \l "se2.1.200_1320" \o "§ 200.320 Methods of procurement to be followed.  (c) Procurement by sealed bids (formal advertising).  Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all)

16.

|  |  |
| --- | --- |
| Summarize the Subrecipient’s formal seal bid process: | |
|  | |
|  | |
| 1. Does the Subrecipient receive at least two or more responsible bids for each procurement transaction? [[2 CFR § 200.320(c)(1)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If the answer to “a” above is “no,” is this a systemic failure (i.e., the Subrecipient’s system" failed to work properly) or does it appear to be isolated failures in some cases? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the procurement transactions lend themselves to firm, fixed price contracts and can selection of known suppliers, be made principally on the basis of price? [[2 CFR § 200.320(c)(1)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the Invitation for Bids publicly advertised and were bids solicited from an adequate number providing them sufficient time before the date set for opening the bids? [[2 CFR § 200.320(c)(1)(i)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5" \l "se2.1.200_1320)  IFBs must be advertised for a minimum of 14 calendar days [STATE OF COLORADO PROCUREMENT MANUAL](https://www.colorado.gov/pacific/sites/default/files/Procurement_Manual.pdf) VENDOR SELECTION METHODS-PROCUREMENT RULES: PART 2 OF ARTICLE 103 Part II 4. F. Competitive Sealed Bidding | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the IFBs, including specifications and pertinent attachments, clearly define the items or services? [[2 CFR § 200.320(c)(2)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were all bids opened publicly at the time and place stated in the IFB? [[2 CFR § 200.320(c)(2)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were the contracts awarded to the lowest responsive and responsible bidders? [[2 CFR § 200.320(c)(2)(iv)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Competitive Proposals [2 CFR § 200.320(d)](https://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is this procurement method used generally when conditions are not appropriate for the use of sealed bids? [[2 CFR § 200.320(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Requests for Proposals (RFPs) clearly and accurately state the technical requirements for the goods or services to be procured? [[2 CFR § 200.319(c)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the proposals solicited from an adequate number of qualified sources, consistent with the nature and requirements of the procurement? [[2 CFR § 200.320(d)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient publicize the RFPs and honor reasonable requests by parties to compete to the maximum extent practicable? [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the RFPs identify all significant evaluation factors, including price or cost where required, and their relative importance? [[2 CFR § 200.320(d)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient:   1. Conduct technical evaluations of submitted proposals? [[2 CFR § 200.320(d)(3)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Determine responsible bidders from such evaluations? [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. As necessary, conduct negotiations, written or oral, for final contract award? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Make awards to the most responsive and responsible bidders whose proposals will be most advantageous to the Subrecipient after price and other factors are considered?   [[2 CFR § 200.320(d)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If proposals involving engineering/architectural professional services are evaluated with respect to factors other than price, can the Subrecipient document the basis for negotiation of fair and "reasonable compensation?” [[2 CFR § 200.320(d)(5)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For procurement of architectural and engineering professional services, does the Subrecipient maintain a list of qualified bidders who can respond to its RFPs? [[2 CFR § 200.319(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1319)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Non-Competitive Proposals [[2 CFR § 200.320(f)]](https://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1320)

30.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If noncompetitive proposals were used, can the Subrecipient show that other methods of procurement (small purchases, sealed bids, formal advertising, or competitive proposals) were infeasible because:   1. the item was only available from a single source, 2. a public exigency or emergency is of such urgency to not permit a delay resulting "from competitive solicitation, 3. after solicitation of a number of sources, competition is determined inadequate, or 4. DOLA granted approval? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CONTRACTOR AND PAYMENTS

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are purchase orders and contracts signed by an authorized program official? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are items delivered and paid for consistent with the items contained in the corresponding purchase order and/or contract? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If contracts have been awarded for construction or facility improvements under the grant program(s) for contracts or subcontracts valued at or below $150,000, does the Subrecipient follow its own requirements relating to:     1. for construction bid guarantees? 2. performance bonds? 3. payment bonds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For construction contracts or subcontracts valued above $150,000, does the Subrecipient meet the minimum Federal requirements for:   1. bid guarantees of at least 5%? [[2 CFR 200.325(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] 2. performance bonds? [[2 CFR 200.325(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] 3. payment bonds [[2 CFR 200.325(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1325&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35. Are the contract provisions listed in [[2 CFR 200.326](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1326)] appropriately included in the grant-assisted contracts?

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Administrative, contractual, or legal remedies | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Termination for cause and for convenience | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Equal Employment Opportunity | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Davis-Bacon Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Copeland “Anti-Kickback” Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Contract Work Hours and Safety Standards Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Clean Air Act Federal Water Pollution Control Act | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Energy efficiency | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Debarment and Suspension | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Byrd Anti-Lobbying Amendment | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Procurement of recovered materials | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| Rights to Inventions Made Under a Contract | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

36. Subrecipient Procurement Policy [[2 CFR 200.317](http://www.ecfr.gov/cgi-bin/text-idx?SID=b2a645105dc46101ef4a970d3645e044&mc=true&node=pt2.1.200&rgn=div5#se2.1.200_1317)]

Name of Subrecipient:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does it contain a written code of ethics and/or conflict of interest provisions? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it provide for a system or requirements for contract administration? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it contain a set of principles for open and free competition? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it describe the different types of contracts comparable to the federal classifications [fixed price, cost reimbursement or time and materials]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it describe methods of procurement comparable to the federal methods [at least: Small purchase, Sealed bid, Competitive proposals]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it have a provision for conducting cost/price analysis? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it have a provision for conducting or developing independent cost estimates before receipt of bids or proposals?   [[24 CFR 85.36(f)(1)](https://www.gpo.gov/fdsys/pkg/CFR-2011-title24-vol1/pdf/CFR-2011-title24-vol1-sec85-36.pdf)] or [[2 CFR 200.323(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=dcc8f25b2bf57f71bb6629a2d9068919&mc=true&node=se2.1.200_1323&rgn=div8)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it have a provision for negotiating profit? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it set forth bonding and insurance requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it have a provision for Small, Minority, and Women owned enterprises contract opportunities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Does it have a provision for the mandated contract provisions? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-E**

1. Fair Housing/Equal Opportunity

**PARTNERING AGENCY’S CHECKLIST FOR FAIR HOUSING/EQUAL OPPORTUNITY**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

AFFIRMATIVELY FURTHERING FAIR HOUSING (**For Local Government recipients)**

1.

|  |
| --- |
| What actions to affirmatively further fair housing have been taken? |
|  |

TITLE VI, SECTION 109 DATA (**For all grantees, Subgrantees and Subrecipients and any entity that collects applicant and beneficiary data from program applications**)

2.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient maintain summary data by activity on beneficiaries of, individuals participating in, and/or applicants for the program, broken out by:   1. race and ethnicity; and 2. gender characteristics? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For race and ethnicity, is the Subrecipient including all the HUD required classes?  American Indian or Alaska Native  Asian  Black or African American  Native Hawaiian or Other Pacific Islander  White  American Indian or Alaska Native **and** White  Asian **and** White  Black or African American **and** White  American Indian or Alaska Native **and** Black or African American  Other multiple race combinations greater than one percent  Balance of individuals reporting more than one race | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | |  |  | |  | | |  |  | |  |  | |  | | |  |  | |  |  | |  |  | |  | | |  |  | |  |  | |  |  | |  |  | |
| **Describe Basis for Conclusion:** | |
|  | |

DISPLACEMENT AND RELOCATION

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient conduct displacement and/or relocation activities?  If yes,  Were there records maintained on households displaced by CDBG-DR-funded activities, which included?   1. race and ethnicity; 2. gender and single heads of households; and 3. addresses and census tracts of the housing units to which each displaced household relocated? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SECTION 504 **(Since 1973 All federal grant recipients had to comply with Section 504 in the operation of their federal program; For state and local governments the three policy items [below] are also now mandatory provisions of** [**Title II of the Americans with Disabilities Act**](https://www.ada.gov/ada_title_II.htm) **[1991])**

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subrecipients with 15 or more employees, is there a formal, written grievance procedure for resolution of complaints alleging discrimination based on disability?  [[24 CFR 8.53(b)]](https://www.ecfr.gov/cgi-bin/text-idx?SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&node=se24.1.8_153&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subrecipients with 15 or more employees, is there a designated coordinator of the Section 504 responsibilities?  [[24 CFR 8.53(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&node=se24.1.8_153&rgn=div8) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For Subrecipients with 15 or more employees, has it taken appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, including those with impaired vision or hearing, that it does not discriminate on the basis of handicap in violation of this part?  [[24 CFR 8.54]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&n=sp24.1.8.d&r=SUBPART&ty=HTML#se24.1.8_154) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ACCESSIBILITY OF NON-HOUSING FACILITIES **(As applicable to the grant program,**

**grantees, Subgrantees and Subrecipients)**

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were CDBG-DR funds used to design and construct new non-housing facilities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes to #8, are the new non-housing facilities being designed and constructed to be readily accessible to, and usable by, persons with disabilities in conformance with accessibility requirements?  [[24 CFR 8.21(a)]](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&n=pt24.1.8&r=PART&ty=HTML#se24.1.8_121) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Were CDBG-DR funds used to make alterations to existing non-housing facilities?  If yes, did such alterations make these facilities usable by, and accessible to, persons with disabilities?  [[24 CFR 8.21(c)](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&n=pt24.1.8&r=PART&ty=HTML#se24.1.8_121)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

HOUSING **(As applicable to the program for all grantees, Subgrantees and Subrecipients)**

11.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the program involve new housing construction or alteration to existing housing?  Are programs or activities readily accessible to, and usable by, persons with disabilities? (NOTE: A lack of records beyond 3 years is not a basis for a finding.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

COMMUNICATIONS **(Available upon request and as needed to provide access to the program application process and benefits to the program)**

12.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient taken steps to ensure effective communication with applicants, beneficiaries, and members of the public who have hearing, vision, or speech impairments using:   1. Qualified sign language and oral interpreters? 2. Readers? 3. Use of tapes? 4. Braille materials? 5. TTD? 6. Other (describe below)?   [[24 CFR 8.6](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&n=pt24.1.8&r=PART&ty=HTML#se24.1.8_16)] | |  |  |  | | --- | --- | --- | | **Yes** | **No** | **N/A** | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |
| --- | --- |
| If the answer to all the items above is “no”, describe the method(s) used by the Subrecipient to facilitate effective communication: |  |
|  |

14.

**(As applicable to the program)**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient adopted and implemented procedures to ensure that interested persons (including those with impaired vision or hearing) can obtain information concerning the existence and location of accessible services, activities and facilities?  Is there documentation to show steps that the Subrecipient has undertaken to attract persons with disabilities, such as:  making buildings more accessible to persons with physical disabilities?  home visits to assist applicants for program benefits in filling out applications?  supplying sign language interpreters for public meetings on issues relating to the participant’s programs? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

RECORD KEEPING **(As applicable to the program)**

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient maintain data for compliance purposes showing the extent to which persons with disabilities are beneficiaries of the program(s) being reviewed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

**(If they were done within 3 years, see Question 11 above)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are copies of the Section 504 Self-Evaluation Form and Transition Plan available for review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

**(As applicable to the program)**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is a copy of the “Reasonable Accommodation Policy” available for review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

SUBRECIPIENTS **(As applicable to the program)**

18.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient make any sub-awards to Subrecipients?  Is there documentation that the Subrecipients monitored Subrecipients to ensure that Section 504, ADA, and Fair Housing Act requirements affecting persons with disabilities are met? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-F**

1. Public Improvements

**PARTNERING AGENCY’S CHECKLIST FOR PUBLIC IMPROVEMENTS**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

ELIGIBILITY

1.

|  |  |
| --- | --- |
| Does each activity meet the requirements of Section 105(a)(2) of the [Housing and Community Development Act of 1974](https://www.hudexchange.info/resources/documents/Housing-and-Community-Development-Act-1974.pdf)? | |
| Does the project involve? [mark any or all]  Acquisition?  New Construction?  Reconstruction?  Rehabilitation? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

2.

|  |
| --- |
| Briefly describe the project: |
|  |

3.

|  |  |
| --- | --- |
| Briefly describe the intended use: |  |
|  |

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is the activity being carried out by a Unit of General Local Government?  If yes, is or will the building or facilities assisted with CDBG-DR funds be used for the general conduct of government?  [[24 CFR 570.207(a)(1)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5" \l "se24.3.570_1207)  If yes, did the State receive a waiver for buildings for the general conduct of government? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is the activity being carried out by a non-profit entity?  [[24 CFR 570.201(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1201)]  Is the title currently or in the future to be held by the non-profit?  Will the facilities be operated so as to be open for use by the general public during all normal hours of operation?  If yes, is the program/Subrecipient claiming *Limited Clientele* as its National Objective? [[24 CFR § 570.483(b)(2)(i)(A)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are [or will] fees being charged for the use of the facilities?  [[24 CFR 570.200(b)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5" \l "se24.3.570_1200)  Are the [proposed] fees reasonable?  or will the [proposed] fees have the effect of precluding low and moderate income persons from using the facilities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

COVERED PROJECT

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is the infrastructure project labeled a ***Covered infrastructure project*** as defined by the *Federal Register* notices published [November 18, 2013](https://www.gpo.gov/fdsys/pkg/FR-2013-11-18/pdf/2013-27506.pdf) and [June 3, 2014](https://www.gpo.gov/fdsys/pkg/FR-2014-06-03/pdf/2014-12709.pdf)?  If the answer is yes, has it been approved by HUD? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| If the project is not identified as a “covered project,” does the documentation in the Subrecipient’s project file support a determination that the project falls outside the “covered project” definition in the *Federal Register* notices published [November 18, 2013](https://www.gpo.gov/fdsys/pkg/FR-2013-11-18/pdf/2013-27506.pdf) and [June 3, 2014](https://www.gpo.gov/fdsys/pkg/FR-2014-06-03/pdf/2014-12709.pdf)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the project is determined to be a “covered project”:   1. Was a comprehensive risk analysis applied to select, prioritize, implement, and maintain infrastructure projects? 2. Were resilience performance standards for the infrastructure project financed with CDBG-DR funds Implemented? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the project is determined to be a “covered project”:   1. Was a process outlined in the amended or approved Action Plan for the design and selection of green infrastructure projects and/or how selected projects will incorporate green infrastructure components incorporated? 2. Was a transparent and inclusive decision process for the selection of ***Covered infrastructure projects*** as described in the Action Plan used? 3. Have plans to monitor and evaluate the efficacy and sustainability of ***Covered infrastructure projects*** been developed and/or implemented?   2013 *Federal Register* notice ([78 FR 69104](https://www.federalregister.gov/documents/2013/11/18/2013-27506/second-allocation-waivers-and-alternative-requirements-for-grantees-receiving-community-development)) and Federal Register notice ([79 FR 31964](https://www.gpo.gov/fdsys/granule/FR-2014-06-03/2014-12709/content-detail.html)) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

FEDERAL MATCH

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the policies and procedures allow CDBG-DR funds to be used as the non-federal match for a project funded by the U.S. Army Corps of Engineers, is the amount of CDBG-DR restricted to $250,000 or less? [[42 USC § 5305](https://www.gpo.gov/fdsys/search/pagedetails.action?sr=268&originalSearch=&st=pass&ps=10&na=&se=&sb=re&timeFrame=&dateBrowse=&govAuthBrowse=&collection=&historical=false&packageId=USCODE-2015-title42&fromState=&bread=true&granuleId=USCODE-2015-title42-chap69-sec5305&collectionCode=USCODE&browsePath=Title+42%2FChapter+69%2FSec.+5305&collapse=true&fromBrowse=true)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

BUSINESS ASSISTANCE PROJECTS

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was assistance provided to private utilities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Was assistance provided to a small business in the liquid fuel supply chain?  If yes, is there an award agreement that requires the business to  adopt measures to mitigate the impact of disasters of the liquid  fuel supply chain?  *Federal Register* Notice published November 18, 2013 ([78 FR 69108](https://www.gpo.gov/fdsys/pkg/FR-2013-11-18/pdf/2013-27506.pdf)) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have a copy of the contract for architectural/engineering services which specifies those services to be provided? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

15.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| State law requires that the documents be reviewed and approved by an engineer/architect registered in the State of Colorado. Has this been done? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

SOLICITATION

16.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the bid package contain the following requisite CDBG-DR documents:  Invitation/Advertisement for Bid?  Instructions to Bidders and Bid Proposal Forms?  Correct Wage Decision?  Equal Employment Requirements?  Section 3 Requirements?  General Conditions of the Contract to include the Federal Labor Standards Provisions ([HUD Form 4010](https://www.hudexchange.info/resources/documents/HUD-Form-4010-Federal-Labor-Standards-Provisions.pdf))?  Supplemental General Conditions for the Contract?  Bonding and Insurance Requirements?  Contractor and sub-contractor eligibility verification requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there evidence a copy of the bid package was sent to all bidders? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If applicable, evidence that bid amendments were sent to each bidder? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain a log of bids received by time, date of receipt, and offer? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |
| --- |
| What’s the bid opening date? Click here to enter a date.  What date did DOLA provide contractor eligibility verification: Click here to enter a date. |

21.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are there minutes of the bid-opening?  Is there evidence of Bid Bond? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the eligibility determination provided before the construction contract was awarded to the successful bidder? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is the successful bidder the lowest bidder?  If no, was a “Statement of Justification” sent to the low bidder explaining? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the date of construction contract award within 90 days of the bid opening? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If no, is there documentation that a new wage decision and lock-in was provided by DOLA? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| If no, contact the Davis-Bacon Specialist to determine whether there was a modification to the wage decision that may have resulted in an underpayment of wages and fringe benefits paid to workers. | |

CONSTRUCTION CONTRACT

26.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the construction contract contain the following requisite CDBG-DR documents:  Invitation/Advertisement for Bid?  Instructions to Bidders and Bid Proposal Forms?  Correct Wage Decision?  Equal Employment Opportunity Requirements?  Section 3 Requirements?  General Conditions of the Contract to include the Federal Labor Standards Provisions ([HUD Form 4010](https://www.hudexchange.info/resources/documents/HUD-Form-4010-Federal-Labor-Standards-Provisions.pdf))?  Supplemental General Conditions of the Contract?  Contractor’s Certifications?  Contractor’s Bid Proposal?  Bond and Insurance Requirements?  Contractor and sub-contractor eligibility verification requirements? | |  |  | | --- | --- | |  |  | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |

CONSTRUCTION PRE-CONSTRUCTION CONFERENCE

27.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did a review of the pre-construction conference minutes adequately detail information regarding:  Federal Labor Standards Provisions (Exhibit VIII-J)?  Additional job classifications requests?  Weekly payroll submission, payroll signatures, and statements of compliance?  Posting the wage decision?  Apprentices and trainees?  Overtime pay provisions?  Payroll deductions?  Employee interviews?  Prevailing wage rates or wages?  Restitution for underpayment of wages?  Section 3 planning requirements?  Contractor and sub-contractor eligibility verification requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

CONSTRUCTION FILE

28.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Review the construction file. Have they adequately kept records of:  Building Permits?  Copies of construction inspections?  Certificate of Occupancy (CO)?  Construction contract?  Contract amendments (if applicable)?  Work order changes (if applicable)?  Deed of Easement (if applicable)?  Copies of payment and performance bond?  Copies of contractor/sub-contractor certification for EEO?  Copies of contractor/sub-contractor certification for Section 3  Copies of contractors/sub-contractor Affidavit of Prime Bidder?  Notice to Proceed date?  Architect's Certification ([Architectural Barriers Act](https://www.gpo.gov/fdsys/pkg/USCODE-2015-title29/html/USCODE-2015-title29-chap16-subchapV-sec792.htm)) or appropriate HUD waivers? | |  |  |  |  | | --- | --- | --- | --- | |  | | | | |  |  |  | | | **Yes** | **No** | **N/A** | | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |  |  |  | | | **Yes** | **No** | **N/A** | |



**SECTION IV-G**

1. Labor Standards

**PARTNERING AGENCY’S CHECKLIST FOR LABOR STANDARDS**

|  |  |
| --- | --- |
| **SUBRECIPIENT INFORMATION** | |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

PAYROLLS

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is a Davis-Bacon wage decision assigned to each covered contract?  [Sec. 3142. Rate of wages for laborers and mechanics](https://www.dol.gov/whd/regs/statutes/dbra.htm) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is the assigned wage decision and HUD-4010, “Federal Labor Standards Provisions,” incorporated into each bid specification and/or contract?  [Fair Labor Standards Act](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain each weekly payroll report from the contractor and sub-contractors, beginning from the construction start through the construction end date or present date (first to current/last)?  [Sec. 3142 C (1) Rate of wages for laborers and mechanics](https://www.dol.gov/whd/regs/statutes/dbra.htm) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| [U.S. DOL Form WH-347 “Statement of Compliance](https://www.dol.gov/whd/forms/wh347instr.htm)”  Are the payrolls signed by an appropriate principal of the firm?  Do they include a signed “Statement of Compliance” from the contractor?  Have questions 4a and 4b been answered in the “Statements of Compliance”? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have the appropriate wages and fringe benefits been paid?  [[Sec. 3141 2(b)](https://www.dol.gov/whd/regs/statutes/dbra.htm)]  If no, explain deficiency and what steps have been taken to correct: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Explanation:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are corrected payrolls on file with the Subrecipient? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was time and half paid for all work over 40 hours?  [Fair Labor Standards § 207](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

8.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Has an underpayment of over $1,000.00 occurred?  Was an Enforcement Report filed with DOLA? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are there apprentices or trainees on the payroll report?  [Fair Labor Standards Act § 214](https://www.dol.gov/whd/regs/statutes/FairLaborStandAct.pdf)  If yes, does the Subrecipient have a copy of the apprentice certification with apprentice’s registration number or the Trainee Program Certification for each trainee or apprentice on the payroll report? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** |  | |  |  |  |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are there additional job classifications on the payroll report that do not appear on the wage determination?  If the answer is yes, is there evidence the Subrecipient requested additional job classifications through DOLA?  If yes, does the Subrecipient’s file contain copies of the approved of additional job classification request wage rates from DOLA? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s file contain evidence that payrolls were reviewed by the Subrecipient in a timely manner to ensure early identification of problems and that correct wages were being paid? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Is there a signed Final Statement of Wage Compliance on file? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

INTERVIEWS

13.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Were job-site interviews conducted?  [Chapter 15 HUD Guide Book 15f04](https://www.dol.gov/whd/FOH/FOH_Ch15.pdf) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have copies of each Record of Employee Interview Form documenting interviews? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did interviews record work performed by worker and observed by the interviewer? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were interviews compared with payrolls? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was at least 10% of each job classification interviewed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the ratio of trade skill workers to laborers acceptable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-H**

1. Housing Repairs/Reconstruction

**PARTNERING AGENCY’S CHECKLIST FOR HOUSING REHABILITATION**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

NATIONAL OBJECTIVE

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do all activities reviewed meet a national objective?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Is the national objective adequately documented in the files?   [[24 CFR 570.506](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1506)] or [[24 CFR 570.490](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1490)] or applicable Federal Register notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. For single family properties: | |
| 1. If benefiting a low-to-moderate income (LMI) household, does the file document that the household is at or below 80% of Area Median Income? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If using the Slum/Blight national objective on an Area basis, does the file demonstrate that the area meets the definition of a slum, blighted, deteriorated or deteriorating area under state or local law? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If using the Slum/Blight national objective on a Spot basis, is the rehabilitation *limited* to those conditions that are detrimental to public health and safety? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. For an activity classified as Urgent Need, were funds expended within 24 months of HUD’s grant agreement for the obligation of funds for the activity being monitored ?   If no, was an extension requested?  [[24 CFR 570.483(b)(3)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1483)] or [[24 CFR 570.208(c)]](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:3.1.1.3.4#se24.3.570_1208)  Waiver: [[Federal Register / Vol. 78, No. 43 / Tuesday, March 5, 2013](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf)]  Request for Extension: [[Federal Register / Vol. 80, No. 90 Monday, May 11, 2015](https://www.fws.gov/endangered/improving_ESA/pdf/Final%20ITS%20Rule%20Federal%20Register%205-11-2015.pdf)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| c. For multifamily properties, the LMI national objective should generally be used. | |
| 1. If the structure contains at least two dwelling units, is at least one unit occupied by a LMI household? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:**   |  | | --- | |  | | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient charging pre-award (‘reimbursement’) costs? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require that all reimbursement activities are consistent with HUD guidance for charging pre-award (‘reimbursement’) costs? [CPD Notice 14-017](https://www.hudexchange.info/resource/4139/notice-cpd14017-guidance-for-charging-preaward-costs--to-cdbg-disaster-recovery-grants/) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies limit reimbursement activities to expenses incurred before the date on which the person or entity applied for CDBG-DR assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies limit reimbursement activities to expenses incurred within one year after the date of the disaster, as applicable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies ensure compliance with other federal cross-cutting requirements including:  Lead-Based Paint?  Civil Rights?  Uniform Relocation Act?  and Davis-Bacon, as described in the guidance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If CDBG-DR funds were used for rehabilitation of real property located within the Special Flood Hazard Area (SFHA), are those assisted properties in compliance with the flood insurance purchase and community participation requirements at Sections 102(a) and 202(a) of the [Flood Disaster Protection Act of 1973, as amended](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=4999a47429a7654bed5cc9532b0aa93f&rgn=div5&view=text&node=12:7.0.2.3.32&idno=12) and at [[24 CFR 570.605](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1605)] and [[24 CFR 570.509(c)(4)(iv)]?](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1509) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOCAL HOUSING CODES

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Have local housing codes been adopted in conjunction with the Subrecipient’s rehabilitation standards?  If the answer to question above is “yes,” how does the Subrecipient determine that the work items meet local codes upon completion? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Describe the process for preparing the work specifications and cost estimates, including which employee’s positions have the responsibility to prepare the cost estimates and approve them. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a written procedure in place for changes in the scope of work and/or specifications? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a procedure for determining if contract costs are reasonable and, if so, who or which employee positions have the responsibility for making the determination and approving the costs?  If the answer to “c” above is “no,” what actions are being taken to ensure that costs are reasonable per [OMB Circular A-87](https://obamawhitehouse.archives.gov/omb/circulars_a087_2004/)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

LOAN SERVICING

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient providing assistance in the form of a loan?  If no, skip to question 20 | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have written loan-financing procedures in place? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If there are written procedures, do they set forth the conditions of assistance, such as the interest rate charged, the loan term, and the maximum borrowing amount? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If there are procedures, do they describe a process for handling delinquencies? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If loans are involved, what is the process for servicing them? (For example, who collects repayments when due and posts them to account records?) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the program provided a loan to an owner, is there a copy of the promissory note and loan agreement on file? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the loans are secured, are the security documents recorded? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a bank is involved in loan servicing, has the Subrecipient signed a written agreement with the bank, specifying the services to be provided by the bank, the fees, and the consequences for failure to perform? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If applicable, has the lender performed any administrative services for the program? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CONTRACTOR SELECTION

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a written contractor selection procedure in place? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to question above is “yes,” describe the contractor selection process, including whether the Subrecipient selects the contractor, or, if the owner selects the contractor, what guidance, if any, is provided by the Subrecipient? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there an adequate pool of contractors who perform rehabilitation work as overseen by the Subrecipient or its designee? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a written procedure for resolving contract disputes? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |
| --- |
| Whether the Subrecipient has written procedures in place or not, describe the Subrecipient’s process for resolving contract disputes. |
| **Describe Basis for Conclusion:** |
|  |

LUMP SUM DRAWDOWNS

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient draw down funds in a lump sum as permitted by the regulation at [[24 CFR 570.513](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)]?  If no, skip to “Escrow” question 37. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to question above is “yes,” what is the date of the execution of the agreement and the amount of the initial deposit? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the Subrecipient has drawn down funds in a lump sum, does the participant have a written lump sum agreement?  [[24 CFR 570.513(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

30.

|  |
| --- |
| If the answer to question above is “yes,” what is the date of the execution of the agreement and the amount of the initial deposit? |
| **Describe Basis for Conclusion:** |
|  |

31.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the lump sum agreement contain the required elements:  the obligations and responsibilities of the parties?  The terms and conditions on which CDBG-DR funds are to be deposited and used or returned?  The rate of interest?  [[24 CFR 570.513(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the agreement describe the benefits to be provided by the private financial institution in support of the Subrecipient’s rehabilitation program, including provisions of interest payments, and at least one of the three regulatory requirements; and are such benefits being provided?  [[24 CFR 570.513(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was a copy of the executed agreement provided to the HUD Field Office (as well as any modifications made to the agreement during its term, if applicable)?  [[24 CFR 570.513(b)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was HUD notified of the amount of CDBG-DR funds distributed to the private financial institution before the funds were used for the intended purpose?  [[24 CFR 570.513(e)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the funds being used in accordance with the written agreement for eligible rehabilitation of privately-owned properties?  [[24 CFR 570.513(b)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did use of the deposited funds commence within 45 days of the deposit?  [[24 CFR 570.513(b)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

37.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were funds substantially disbursed within 180 days of receipt of the deposit (e.g., 25% of the fund, deposit plus interest earned)?  [[24 CFR 570.513(b)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient review the level of program activity annually?  [[24 CFR 570.513(b)(5)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1513)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ESCROW

39.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Subrecipient established escrow accounts for use in funding the rehabilitation of residential properties? (If the answer is “no,” stop here.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

40.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to question above is “yes,” are the use of the funds limited to loans and grants of primarily residential properties containing no more than four dwelling units (and accessory space, if applicable)?  [[24 CFR 570.511(a)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1511)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

41.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the escrow accounts used and funds deposited into an escrow account, only when specifically provided for in an executed contract between a property owner and contractor?  [[24 CFR 570.511(a)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1511)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the amount of funds deposited limited to an amount expected to be disbursed within 10 working days from date of deposit?  [[24 CFR 570.511(a)(4)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1511)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are escrow funds deposited into an interest-bearing account?  [[24 CFR 570.511(a)(3)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1511)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

44.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to question above is “yes,” is the interest earned on the account remitted to HUD at least quarterly (less any service charges), unless the interest is attributable to the investment of program income (in which case, this should be described in the “basis for conclusion” below)?  [[24 CFR 570.511(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1511)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-I**

1. Housing New Construction

**PARTNERING AGENCY’S CHECKLIST FOR NEW HOUSING CONSTRUCTION**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

1.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the program include:   1. Single family units? 2. Multifamily units? 3. or both? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are the units:   1. Rental? 2. Owner-occupied? 3. or both? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| What type(s) of entity(ies) are carrying out the program:   1. Local Government? 2. Non-profit organization? 3. For-profit developer? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the Subrecipient able to document that the disaster affected the quality, quantity, and/or affordability of the housing stock, causing that housing stock to be unable to meet post-disaster needs and population demands? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures of the Subrecipient require that activities with costs reimbursable by, or for which funds are made available by, the Federal Emergency Management Agency or the Army Corps of Engineers **not** be funded with CDBG-DR funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s program require compliance with green building standards? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s program include multi-family projects containing five or more units?  If yes, does it meet the following accessibility requirements?   1. A minimum of 5% of total dwelling units (but not less than one unit) are accessible for individuals with mobility impairments? 2. An additional 2% of dwelling units (but not less than one) are accessible for persons with hearing or vision impairments? 3. Are all units made adaptable on the ground level or can be reached by an elevator?   [[Section 504 of the Rehabilitation Act of 1973](https://www.ada.gov/cguide.htm#anchor65610) and [24 CFR 8.22](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.8#se24.1.8_122), Fair Housing Act] | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do the program activities take place in an area delineated as a special flood hazard area (SFHA) according to FEMA’s most current flood advisory maps?  If “yes” and the activity constitutes financial assistance for acquisition or construction purposes, does the program require owners of an assisted building or mobile home within a SFHA to obtain and maintain flood insurance?  Does the program require activities within a SFHA to be designed or modified to minimize harm to or within floodplains in accordance with [Executive Order 11988](https://www.archives.gov/federal-register/codification/executive-order/11988.html) and [24 CFR part 55](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=97a50e75891a65a7fbced896b890743e&r=PART&n=24y1.1.1.1.32)?  Does the program require new housing within a SFHA to be elevated one foot higher than the latest FEMA-issued base flood elevation? | |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

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| --- | --- | --- | --- | --- | --- |
| Has the Subrecipient documented how the activities relate to the impact of the applicable disaster(s)?  [Fed Reg Vol. 78 No, 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient establish that program funds did not supplant funds made available by the Federal Emergency Management Agency or the Army Corps of Engineers? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

National Objective

11.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity is classified under the **low- and moderate-income (LMI) housing** national objective, do reviewed program files document:   1. For single-family units, households have incomes at or below 80% of the area median income? 2. For multi-family units, if the structure contains two dwelling units, is at least one unit occupied by a LMI household? 3. For multi-family units, if the structure contains more than two dwelling units, are at least 51% of the units occupied by LMI households? 4. For rental units, has a period of affordability been established for assisted properties? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

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| --- |
| For **Urgent Need** national objective use the National Objective checklist for Urgent Need and attach to this checklist. |

13.

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| --- | --- | --- | --- | --- | --- |
| Do reviewed activity files document that activities met or will meet an acceptable national objective (i.e. one allowed by the policies and procedures)?  [[24 CFR 570.483](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)] or [[570.490](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1490)] or [[570.506](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)], or applicable *Federal Register* notice] | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to any of the above is “yes,” is the Subrecipient taking corrective action (e.g., seeking recapture of funds resulting from an overpayment)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-J**

1. Acquisitions/Buyouts/Relocation

**PARTNERING AGENCY’S CHECKLIST FOR ACQUISITIONS/BUYOUTS/RELOCATION**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

Acquisitions/Buyouts/Relocation

ELIGIBILITY

1.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Are the activities funded under this program eligible under the [Housing and Community Development Act](https://www.hudexchange.info/resources/documents/Housing-and-Community-Development-Act-1974.pdf)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **List the Citation for Eligibility:** | |
|  | |

2.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are reviewed activities related to the impact of the applicable disaster(s)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| As required by the appropriation law, are activities located in a county that was Presidentially-declared as a major disaster? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

GENERAL MANAGEMENT

4.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a Residential Anti-displacement and Relocation file?  If Yes, does it contain the following information?   1. Resolution adopting the Plan 2. Residential Anti-displacement/Relocation Certification 3. If applicable, regulations, information booklets, relocation claim forms? 4. Does the Plan identify a person who is responsible for displacement and relocation compliance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient have policies and procedures for the program being implemented? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were environmental reviews completed for each property acquired? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

PROPERTY BUYOUTS

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient conduct property acquisitions for the purpose of mitigating flooding hazards? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Are the acquisitions of property by the Subrecipient located in a floodway, floodplain or a designated Disaster Risk Reduction Area and is intended to reduce risk from future flooding?  [[Federal Register /Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) or [Vol. 80, No. 222](https://www.gpo.gov/fdsys/pkg/FR-2015-11-18/pdf/2015-29391.pdf)] | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the properties dedicated and maintained (restricted deed) in perpetuity for a use that is compatible with open space, recreational, or wetlands management practices? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient uniformly apply an appropriate valuation method (including the use of pre-flood value or post-flood value as a basis for property value) in using CDBG-DR funds for buyouts? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a prohibition on new structures being erected on property acquired, accepted or from which a structure was removed under the acquisition or relocation program, other than?   1. a public facility that is open on all sides and functionally related to a designated open space (e.g., a park, campground, or outdoor recreation area)? 2. a rest room? 3. a flood control structure? 4. a structure that the local floodplain manager approves in writing before the commencement of the construction of the structure? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a prohibition on applying for additional disaster assistance for any purpose that will be made by the Subrecipient to any Federal entity in perpetuity with respect to any property acquired, accepted, or from which a structure was removed under the acquisition or relocation program? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

BUYOUT ACQUISITION AND NON-BUYOUT VOLUNTARY ACQUISITION

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient require the purchase price for any acquisitions with CDBG-DR funds to be based on fair market value in accordance with applicable cost principles?  [*Federal Register* notices published [March 5, 2013](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) and [May 29, 2013](https://www.gpo.gov/fdsys/pkg/FR-2013-05-29/pdf/2013-12693.pdf); applicable to grants under Public Laws [112-55](https://www.congress.gov/112/plaws/publ55/PLAW-112publ55.pdf) and [113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain a written notification to the seller that the property would not be taken through eminent domain condemnation if negotiations failed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| A Notice of Determination of Exemption (Exhibit VI-D) is required to evidence the transaction as voluntary. Is there a signed Notice of Determination of Exemption in the’s file? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:**  **Exhibit VI-D is a form the state created and can be found in the State CDBG Guidebook.** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there a copy of the signed owner’s acknowledgement of a voluntary acquisition and does it contain the fair market value of the property on file?  **If there is not a voluntary acquisition acknowledgement the acquisition will be considered not voluntary.** | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were any tenants or businesses occupying the property at time of acquisition or at the time of the flood? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes, is there evidence occupants were advised of their rights under the URA? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the owner waived his rights under URA, is there a signed voluntary acquisition notice (Exhibit VI-C or VI-D) signed by the owner on file? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion: Forms can be found in the State CDBG Guidebook.** | |
|  | |

20.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are the following documents on file:   1. Identification of property and property owner(s)? 2. The purchase contract and documents conveying the property? 3. The Settlement Statement and evidence the owner received net proceeds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was notification of fair market value provided prior to the signing of a purchase offer? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there adequate documentation in the file to support the basis for determining the fair market value? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Applicable to property donations only

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was an appraisal conducted? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If no, is there a signed waiver of appraisal statement by the property owner(s)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file contain a copy of the “Notice of Determination of Exemption” (Exhibit VI-D)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion: Form can be found in State CDBG Program Guidebook.** | |
|  | |

Acquisition/Involuntary

26.

|  |
| --- |
| What is the date of submission of the application for Federal financial assistance, or the date of site control, if later? |
| Date: Click here to enter a date. |

27.

|  |
| --- |
| Pursuant to [[49 CFR 24.2(a)(15)](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_12)], what is the date of “initiation of negotiations”?  Date: Click here to enter a date. |

28.

|  |  |
| --- | --- |
| What activities are being monitored: | |
| 1. Acquisition (including Down-payment Assistance)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Conversion? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Demolition? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Rehabilitation? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |

29.

|  |  |
| --- | --- |
| Will the activity(ies) trigger | |
| 1. URA requirements? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Section 104(d) requirements?   NOTE: The 104(d) requirements were waived if the Subrecipient has defined in their Plan demonstrable hardship. | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion** | |
|  | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain a Relocation Plan, if applicable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |
| --- | --- |
| Does the project file contain an occupant roster, current at the time of the flood, including all of the following information? (If no current roster is available, indicate below the reason, the date of the latest roster, or whether something other than a roster was used.) | |
| 1. Resident Name? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Household Size (if applicable)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Household Income (if applicable)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Unit Size? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Rent/Utility Cost? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain an occupant list from the time of the flood? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

33.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a comparison of the occupant lists from the time of flood suggest displacement may have occurred? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

34.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain an explanation of the reasons any persons vacated between the time of the flood and initiation of negotiations? (Include the names of persons who moved out without receiving notices or assistance below.) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

35.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain a copy of a Move-In Notice for all new occupants that moved into the project since application? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

36.

|  |
| --- |
| If applicable, does the project file contain an occupant list current at the time of the Initiation of Negotiations? |
| **Describe Basis for Conclusion:** |
|  |

37.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the project file contain information (i.e., advisory services log, intake form) about the advisory services that will be/have been offered?  [[49 CFR 24.9(a);](http://www.ecfr.gov/cgi-bin/text-idx?SID=6841d35441597715097a8637dbfcfba7&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_19) [49 CFR 24.205(c)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1205) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Were all advisory services offered in compliance with the requirements of [[49 CFR 24.205(c)](https://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1205)]? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

39.

|  |  |
| --- | --- |
| Does the project file contain copies of the following notices: | |
| 1. General Information Notice and When a Public Agency Acquires Your Property?   [[49 CFR 24.203(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1203) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Notice of Eligibility?   [[49 CFR 24.203(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1203) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Notice of Non-displacement? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. 90-day Notice?   [[49 CFR 24.203(c)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1203) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. 30-day Notice? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Temporary Relocation? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Interest?   [[49 CFR 24.102(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1102) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Notice of Intent to Acquire? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

40.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project file contain evidence that notices were hand delivered or served registered or certified mail, return receipt requested?  [[49 CFR 24.5]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_15) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

41.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the property appraised? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was the property appraised by a qualified appraiser prior to negotiations? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was a review appraisal conducted?  Date of the review: Click here to enter a date. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

44.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the land or property was occupied, was the owner(s) or appointed designee(s) invited to attend the appraisal? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

45.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was a written offer describing the basis for determining just compensation provided to the owner prior to any bargaining?   1. Date of offer: Click here to enter a date. 2. Property purchase price: 3. Date of closing: Click here to enter a date. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

46.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the project file contain signed copies of replacement housing payment claim forms? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Were the amounts paid supported by documentation (i.e., rent receipts, lease, and utility bills for old, comparable or actual replacement unit)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

47.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the project file contain signed copies of moving cost claim forms? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Were the amounts paid supported by documentation (i.e., receipts, estimates, etc.)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

48.

|  |  |
| --- | --- |
| Does the project file contain documentation to support that the following types of replacement housing units are decent, safe and sanitary: | |
| 1. Comparable replacement unit(s)?   [[49 CFR 24.2(a)(6)(i)] and [24.2(a)(8)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_12) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Actual replacement?   [[49 CFR 24.401(a)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1401)] or [[24.402(a)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1402) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Temporary unit? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

49.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient correctly calculate replacement housing payments for the project being reviewed?  [[49 CFR Part 24, subpart E](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#sp49.1.24.e)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

50.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient correctly calculate the moving and related expense reimbursements for the project being reviewed?  [[49 CFR Part 24, subpart D](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#sp49.1.24.d)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

51.

|  |  |
| --- | --- |
| Certification of Legal Residence: [[49 CFR 24.208](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1208)] | |
| 1. Did all persons receiving assistance sign a certification of legal residency?   [[49 CFR 24.208(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1208) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Did persons who did not provide a certification of legal residency or who have been determined to be not lawfully present in the United States, and who received assistance, claim an exceptional and extremely unusual hardship exemption?   (If so, identify below the documentation supporting hardship claim and indicate whether payments were made with HUD funds.) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

52.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Did the Subrecipient promptly review any appeals filed by aggrieved persons in compliance with the requirements of the URA and [49 CFR Part 24]?  [[49 CFR 24.10(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_110) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

53.

|  |  |
| --- | --- |
| Did the Subrecipient comply with the requirement that: | |
| 1. No waiver of relocation assistance be proposed or requested?   [[49 CFR 24.207(f)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1207) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Additional or alternative assistance be provided under the Last Resort housing provisions of the URA when comparable replacement dwellings are not available within the monetary limits for owners or tenants set for in [49 CFR 24.401(b)](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1401) and [24.402(a)](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1402)?   Also [[49 CFR 24.404(a)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1404) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. No part of a relocation payment to a displaced person is withheld to satisfy an obligation to any other creditor?   [[49 CFR 24.403(a)(6)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1403) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. No displaced person be denied eligibility for a replacement housing payment solely because he/she does not meet the occupancy requirements at [[49 CFR 24.401(a)](https://www.ecfr.gov/cgi-bin/text-idx?SID=aae92b980819d372a3e6f841f09b36a3&mc=true&node=se49.1.24_1401&rgn=div8)] and [[24.402(a)](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1402)] for a reason beyond his/her control?   Also [[49 CFR 24.403(d)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_1403) | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| 1. Temporary relocation did not extend beyond one year before the person is either returned to his/her previous unit or location or offered permanent relocation assistance?   [[49 CFR 24.2(a)(9)(ii)(D](http://www.ecfr.gov/cgi-bin/text-idx?SID=e542cd5124db6e571dabb163788a0c7c&mc=true&node=pt49.1.24&rgn=div5#se49.1.24_12))] | |  |  |  |  | | --- | --- | --- | --- | |  |  | |  | | **Yes** | | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

ONE-FOR-ONE REPLACEMENT/DEMOLITION

**Note:** HUD waived the one-for-one replacement for affordable units that were substantially damaged. **HUD did not waive the requirements for affordable units that were NOT substantially damaged**.

54.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient demolish units that were not substantially damaged by the flood?  **If yes, the Subrecipient must make public by publication in a newspaper** of general circulation the following items and submit to the Department of Local Affairs:   1. description of the proposed activity? 2. location on a map and number of dwelling units by size that are affected? 3. time schedule for commencement and completion of demolition or conversion? 4. location on a map of replacement dwelling units by size? 5. source of funding and time schedule for replacement (replacement housing must be initially made available for occupancy at any time during the period beginning **one year before** the Subrecipient’s submission of this information and ending **three years after** the commencement of demolition or conversion)? 6. basis of ensuring that replacement units will remain low/moderate for at least 10 years from initial occupancy? 7. if any proposed replacement units are smaller than previous units, information demonstrating that it is consistent with the housing needs of lower-income households in the jurisdiction? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** |  |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |



**SECTION IV-K**

1. Economic Development

**PARTNERING AGENCY’S CHECKLIST FOR ECONOMIC DEVELOPMENT**

**SUBGRANTEE INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subgrantee Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

GENERAL PROGRAM OVERVIEW

1.

|  |  |
| --- | --- |
| Provide a brief description of the program (e.g., purpose of funding,): |  |
| **Describe:** |
|  |

2.

|  |  |
| --- | --- |
| Describe the eligibility requirements: |  |
| **Describe:** |
|  |

3.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| What forms of assistance does the program provide:  Grants?  Loans?  Forgivable Loans? | |  |  |  | | --- | --- | --- | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | |  |  |  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Subrecipient receive a public benefit waiverfor certain economic development activities for this program?  [[Federal Register/Vol. 78, No. 43/]](http://www.uscg.mil/TVNCOE/Documents/default/TSACFR.pdf" \o "Public benefit for certain economic development activities. The public benefit provisions set standards for individual economic development activities (such as a single loan to a business) and for economic development activities in the aggregate. Currently) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

5.

|  |
| --- |
| What is minimum amount of assistance?    What is the maximum amount of assistance? |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the applications for assistance demonstrate the impact from the disaster, or proof of loss? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the process illustrate all sources of funding received by the applicants? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient review applications for Duplication of Benefits? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient conduct basic financial underwriting of applicants prior to providing assistance to a for-profit business? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

NON LMI JOBS NATIONAL OBJECTIVE(S) UTILIZED FOR THE PROGRAM

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the program use “Urgent Need” as a National Objective for any assistance provided? (If yes see the “Urgent Need” section of the “National Objective” checklist for further questions.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the program use “Micro-Enterprise” as an eligible activity for any assistance provided? (If yes see the “National Objective” checklist for “Limited Clientele” for further questions.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the program use “LMI Area Wide Benefit” as a National Objective for any assistance provided? (If yes see the “LMI AWB” section of the “National Objective” checklist for further questions.) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

JOB CREATION/RETENTION

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If using the “Creation/Retention of Jobs” for low-to-moderate income (LMI) persons: Is the Subrecipient or Subgrantee using the waiver allowing it to apply individual salaries or wages-per-job, and the income limits, for a household of one?  [Federal Register Vol. 78, No. 43, March 5, 2013](http://www.uscg.mil/TVNCOE/Documents/default/TSACFR.pdf), Waiver | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

14.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer above is “yes”, has documentation been maintained on the creation and retention of:   1. total jobs? 2. number of jobs within certain salary ranges? 3. the average amount of assistance per job and activity or program? 4. the types of jobs? 5. The North American Industry Classification System (NAICS) code for each job? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
| [Federal Register, Vol. 78, No. 43, March 5, 2013](http://www.uscg.mil/TVNCOE/Documents/default/TSACFR.pdf) | |

15.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer above is “no,” has the Subrecipient (and/or Subgrantee) demonstrated LMI-Jobs using total household income and total household size?  and/or  Is the Subrecipient using “presumed benefit” based on the census tract where the person resides or the business is located for LMI eligibility per [[24 CFR 570.483(b)(4)(iv) and/or (v)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1483)]? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s applications for assistance and written agreements have provisions for:  Listing by job title of the permanent jobs to be created or retained, identifying which are part-time, if any?  If assisted businesses include part-time jobs, are they computed on a full-time equivalent (FTE) basis using 40 hours as an FTE?  If assisted businesses included temporary jobs in the application, are they excluded from the written agreements and/or the job reporting figures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

JOB CREATION

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For assisted businesses that meet the national objective based on jobs being **held by** low- and moderate-income persons, does the Subrecipient require a written agreement between the Subrecipient and the assisted business committing the business to have at least 51% of the jobs, on a full-time equivalent basis, to be **held by** low- and moderate-income persons?  [[24 CFR 570.506(b)(5)(ii)(A)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For assisted businesses that meet the national objective based on jobs being **made “available to”** low- and moderate-income persons, does the Subrecipient require a written agreement between the and the businesses which contains commitments from the businesses that they will make at least 51% of the jobs **available to** low- and moderate-income persons and will provide training for any jobs requiring special skills and education?  [[24 CFR 570.506(b)(5)(i)(A)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

JOB RETENTION

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient qualify the businesses assisted on the basis of job retention? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If yes, what evidence does the Subrecipient require businesses to show that jobs would have been lost without the CDBG-DR assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there documentation for each assisted business that lists the job title of the permanent **jobs retained** (including which jobs are part-time) and which jobs are **held by** low- and moderate-income persons (where it is known) at the time CDBG-DR assistance was provided? [[24 CFR 570.506(b)(6)(ii)](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

AND/OR

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there documentation as to which of the **retained jobs** are projected to become **available to** low- and moderate-income persons through job turnover within two years of the CDBG-DR assistance being provided? [[24 CFR 570.506(b)(6)(ii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=a4f83a2b86805623812a46e0ed52d83e&mc=true&node=pt24.3.570&rgn=div5#se24.3.570_1506)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |



11.1 Economic Development File Checklist for Each Assisted Business

[Duplicate as needed]

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Name of Assisted Business |  | | | | |
| Amount of Assistance | $ | | | | |
| Date of Assistance | Click here to enter a date. | | | | |
| Purpose of Assistance | Click here to enter text. | | | | |
| ***Proposed*** Number of Full Time Jobs | To Be Created | | To Be Retained | | |
| ***Actual*** Number of Full Time Jobs | To Be Created | | To Be Retained | | |
| Number of ***Actual*** LMI jobs | Held By: | Made Available to: | | | Combination: |
| LMI Determination | Waiver  Yes  No | Household Income  Yes  No | | | Presumed  Yes  No |
| Date Determined | Click here to enter a date. | | | | |
| If LMI Jobs was not used, check appropriate National Objective  N/A | Urgent Need  Yes | Slum & Blight  Yes | | LMI AWB  Yes | |
| Was the following documentation found in the file? | Underwriting  Yes  No | | Describe: | | |
| National Objective  Yes  No | | Describe: | | |
| Duplication of Benefits  Yes  No | | Describe: | | |
| Environmental Review  Yes  No | | Describe: | | |
| Davis Bacon  Yes  No  NA | | Describe: | | |
| Listing of by job title of the permanent jobs to be created or retained  Yes  No | | Describe: | | |
| Which jobs (if any) are part-time;  Yes  No | | Describe: | | |
| Which jobs will be **held by** to low- and moderate-income persons; or  Yes  No  NA | | Describe: | | |
| Which jobs will be **made available to** low- and moderate-income persons; (for job retention) thorough turn over within two years which of those jobs require special skills or education  ☐ Yes ☐ No ☐ NA | | Describe: | | |
| Job Retention Only | Evidence clearly and objectively shows that jobs would have been lost without CDBG assistance?  Yes  No | | Describe: | | |



**SECTION IV-L**

1. Tourism

**PARTNERING AGENCY’S CHECKLIST FOR TOURISM**

**Program Eligibility [**[**24 CFR 570.200**](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1200)**]**

1. What is the eligible activity of this program [[24 CFR 570.482](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1482)]?

*DR Tourism promotion as authorized by waiver Federal Register/Vol. 79, No. 106/Tuesday, June 3, 2014 waiving the requirements of 42 USC 5305(a) and providing alternate requirements.*

2. What is the National Objective for this program? [[24 CFR 570.483](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1483)]

*Urgent Need (24 CFR 570.483(d)) as described in Action Plan version 1.2 and as provided for in FRN Vol 78 Mar 5, 2013 page 14336.*

3. Provide a brief description of the program (e.g., purpose of funding,)

*The xxx subrecipient has received $xx, xxx to purchase promotional advertisement for the xxx region to mitigate the effects of the 2013 disaster and its impact on tourism related businesses.*

**Program Performance**

4. What are the specific performance goals of this program? [[2 CFR 200.276](https://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-part200.pdf)]

*The goals of this program are to reinvigorate tourism activity for the xxx region by increasing advertisement and promotional through xxx and xxx activities.*

5. What are the performance indicators of this program? [[2 CFR 200.210(d)](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1210&rgn=div8)]

*The immediate range indicators will be the changes measured in the sales receipts of tourism relating businesses in the leisure hospitality and food services industries, followed by the changes in employment in these businesses and the longer range indicators will be measured in employment in other industries in the xxx region.*

**TOURISM MONITORING**

*Page 2*

6. What are the expected outcomes of this program? [[2 CFR 200.301](https://www.ecfr.gov/cgi-bin/text-idx?SID=c3177857cee8ebceb302215153fd1f73&node=se2.1.200_1301&rgn=div8)]

*With the expenditure $xx, xxx DR funds through xxx and xxx activities the xxx SR expects that regional tourism related businesses will see an xx% increase in sales receipts and providing for an xx% employment increase in tourism related businesses and xx% increase in xxx regional tax revenues.*

7. What is the time period of program accomplishment? [2 CFR 200.77]

*The expenditure of DR funds will be accomplished no later than* Click here to enter a date. *as set forth in the subrecipient agreement. The measurement of outcomes in sales receipts will be accomplished by* Click here to enter a date.*; the measurement of employment will be accomplished by* Click here to enter a date. *and the reporting of xx regional tax receipts will be completed by* Click here to enter a date.*.*

7. [According to the performance measures above] is the program participant meeting the schedule for completing the program work? [[24 CFR 570.503(b)](https://www.ecfr.gov/cgi-bin/text-idx?SID=35388c2c364be0f9264f1276e126d8ca&node=se24.3.570_1503&rgn=div8)]  Yes  No

**PROCUREMENT [**[**2 CFR 200.318-.326**](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1.4.31&rgn=div7)**]**

Program Participant’s Procurement Policy

8. Does it contain a written code of ethics and/ or conflict of interest provisions?

[[2 CFR 200.318(c)](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1.4.31&rgn=div7)]?  Yes  No

9. Does it provide for a system or requirements for contract administration?

[[2 CFR 200.318(i)](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1.4.31&rgn=div7)]?  Yes  No

10. Does it contain a set of principles for open and free competition?

[[2 CFR 200.319](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a474331c98ed01a0272c6bff20842ae&mc=true&node=se2.1.200_1319&rgn=div8)]?  Yes  No

11. Does it describe methods of procurement comparable to the federal methods [at least: micro-purchases, small purchase, competitive proposals] [[2 CFR 200.320](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8)]?  Yes  No

Purchases

12. Did the subrecipient make any purchases with DR funds above the Small Purchase threshold? [$150,000; [2 CFR 200.320(b)](https://www.ecfr.gov/cgi-bin/text-idx?SID=10f34cdb5df1422174358acaaea3bfad&node=se2.1.200_1320&rgn=div8)]?  Yes  No

13. If yes, was the appropriate procurement method used [sealed bid or competitive proposals]? ☐ Yes ☐ No ☐ NA

14. Did the program participant make any purchases with DR funds above the micro purchase threshold?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

15. Did the purchase otherwise qualify as a Small Purchase:

Total purchase under $150,000?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

16. Did it require specifications or detailed scope of work?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

17. Simple product or service solicitation with definitive quantity and/or quality to obtain firm quotations of price?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

18. Did the procurement file contain:

A copy of the solicitation [product/service description]  Yes  No

A list of vendors solicited  Yes  No

Copies or a list of offers  Yes  No

19. Was the number of offers sufficient to establish cost reasonableness through price competition?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

20. Did the program participant award the purchase to the lowest responsive vendor?

Yes  No

or

21. If No, did the program participant provide documentation for not selecting the lowest price in the contract file?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

**Financial Management [**[**2 CFR 200.302**](https://www.ecfr.gov/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200_1302&rgn=div8)**]**

22. What is the amount of the program participant’s award? $

How much has been obligated to date? $

23. How much has been expended to date? $

24. How much is currently unobligated? $

25. Has the project earned program income?  Yes  No  NA

26. Has the program participant, if applicable, maintained a properly segregated account of CDBG funds from other funds which document revenues and expenditures associated with the project or have an accounting system sufficient to account for commingling of funds?

Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

27. Do the program participant’s accounting records contain information on grant awards, obligations, unobligated balances, assets, liabilities, expenditures, and program income?

Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

28. If the program participant requests funds in advance, does the participant minimize the time elapsed between the transfer of funds from the U.S. Treasury and disbursement by the participant?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

29. Were any charges to the CDBG-DR program made for salaries and wages, whether treated as direct or indirect costs, based on payrolls documented in accordance with the generally accepted practice of the governmental unit and approved by a responsible official(s) of the subrecipient?  Yes  No

The program guidelines prohibit these expenditures

30. Does the program participant have an organizational chart that sets forth the actual lines of responsibility?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

31. Review the program participant’s system for pay authorizations, processing invoices for approval and payment to include who approves payment requests, who prepares checks, and who signs checks. Is the process adequate?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

32. Does the program participant’s chart of accounts include a complete listing of the account numbers/identifiers used to support the control needed to ensure that resources used do not exceed resources authorized?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

33. Do the program participant’s controls over the design and use of documents and records provide reasonable assurance that transactions and events are properly documented, recorded, and auditable?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

34. Did the program participant receive an award based upon matching funds?

☐ Yes ☐ No ☐ NA

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

35. If yes, has the program participant adequately demonstrated the required non CDBG-DR funds were expended for the program?  Yes  No

Insert “other means” that demonstrate supplement and not supplant requirement- questions here Click here to enter text.

If no,

OMB Circular A-133: Audits of States, Local Governments, and Non-Profit Organizations

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the Subrecipient, and if applicable, subawards subject to the Single Audit Act? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

37.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If an audit was required, were there any deficiencies/findings noted in the most recent audit completed? If yes, describe deficiency: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the Subrecipient’s audit report include an opinion on whether the financial statements are presented fairly in all material respects in conformity with GAAP and whether the schedule of expenditures is presented fairly in all material respects? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

39.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Subrecipient’s financial statements reflect its financial position, results of operations or changes in net assets and, where appropriate, cash flows for the fiscal year? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

**Duplication of Benefits**

40. Prior to close out, did the agency provide an updated DOB affidavit restating all sources of funding assistance provided?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

41. Was there any duplicative assistance provided to the agency during the course of the contract?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

42. If so, were funds recaptured? Or was an award amount adjusted by deobligation?  Yes  No

|  |
| --- |
| **Describe Basis for Conclusion:** |
|  |

43. Does the program participant maintain adequate source documentation?  Yes  No

To determine compliance, select a sample of expenditures and determine whether they are supported by invoices, contracts, or purchase orders, etc.

Payee/Vendor:

Date of Invoice: Click here to enter a date.

Amount:

Invoice #:

Reimbursement Amount:

Check #:



**SECTION IV-M**

1. Duplication of Benefits

**PARTNERING AGENCY’S CHECKLIST FOR DUPLICATION OF BENEFITS**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date On-site | Click here to enter text. |

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the subrecipient agency policies and procedures require all other sources of disaster assistance for the same purpose to be identified and considered in order to prevent a duplication of benefit (DOB)?  [Federal Register / Vol. 76, No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Are applicants for assistance to the subrecipient agency required to disclose the following potential sources of disaster assistance:   1. Insurance? 2. Federal Emergency Management Agency (FEMA)? 3. Small Business Administration? 4. National Flood Insurance Program (NFIP)? 5. Other federal, state, or local funding? 6. Other nonprofit, private sector, or charitable funding? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

Policies and Procedures

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Do the subrecipient agency policies and procedures require all beneficiaries to enter into a signed agreement (e.g., subrogation agreement) to repay any assistance later received for the same purpose as the CDBG-DR disaster recovery funds? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Do the subrecipient agency policies and procedures address recapture of CDBG-DR funds (e.g., in case of an overpayment, duplication of benefit)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require the subrecipient agency to comply with HUD’s guidance when assisting applicants that declined SBA assistance to ensure expenditures are for “necessary costs” of recovery, as required by [Public Law 113-2](https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf) (and other supplemental appropriations, as applicable)? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do these subrecipient agency policies and procedures include:   1. Identification of the circumstances under which applicants declined assistance? 2. Establishment of why CDBG-DR assistance is appropriate when assisting applicants that declined SBA assistance? 3. Determination of the amount of CDBG-DR assistance that is necessary and reasonable to assist applicants in achieving recovery? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Do the subrecipient agency policies and procedures exclude non-duplicative assistance from the final benefit calculation for the following instances:   1. Provided for a different purpose? 2. Used for a different, eligible purpose? 3. Assistance not available to the applicant? 4. Assistance is a private loan not guaranteed by SBA? 5. Any other asset or line of credit available to the applicant?   [Federal Register / Vol. 76, No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

Activity Files

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the subrecipient agency require applicants to disclose all sources of assistance that were provided to applicant for the same purpose? Is there a determination of DOB worksheet in each project file? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. How did the DOB determination impact the applicant’s CDBG-DR award? If a DOB was found, was there a reduction in the award amount? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. Did the subrecipient agency require each applicant to enter into a signed agreement (e.g., subrogation agreement) to repay subsequent duplicative assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
| 1. If a DOB occurred after assistance was awarded, were funds recaptured in accordance with the agreement and the grantee’s policies and procedures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.1 Individual Project Duplication of Benefits Worksheet

DOB **Worksheet** for checking Subrecipient’s CDBG-DR Award and DOB determination.

[Federal Register /Vol. 76 No. 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf)/ November 16, 2011

Make additional copies for each file sampled

|  |  |  |  |
| --- | --- | --- | --- |
| 1. Identify Applicant’s Total Need Prior to Any Assistance (e.g. rehabilitation cost estimate) | | | $ |
| 2. Identify All Potentially Duplicative Assistance: | | | |
|  | | Potential | Actual DOB |
| a. FEMA Housing Grant | Interim Housing (e.g. rent) | $ | $ |
| Permanent Housing (e.g. repair/rehabilitation) | $ | $ |
| b. SBA Loan | | $ | $ |
| c. Insurance (Structure, not Contents) | | $ | $ |
| d. National Flood Insurance Program (NFIP) | | $ | $ |
| e. Other federal, state, or local funding | | $ | $ |
| f. Other nonprofit, private sector, or charitable funding | | $ | $ |
| Totals | | $ | $ |
| 3. Total of all assistance found to be duplicative, resulting in the maximum potential award amount, or unmet need (Actual DOB Total) | | $ | $ |
| 4. Maximum Eligible Award (Item 1 less Item 3) | | $ | $ |
| 5. Program Cap (if applicable) | | $ | $ |
| 6. Final Award (lesser of Items 4 and 5) | | $ | $ |



**SECTION IV-N**

1. Section 3

**PARTNERING AGENCY’S CHECKLIST FOR SECTION 3**

**SUBRECIPIENT INFORMATION**

|  |  |
| --- | --- |
| Contract Number | Click here to enter text. |
| Subrecipient Name | Click here to enter text. |
| Type of Organization | Click here to enter text. |
| Name of Program | Click here to enter text. |
| Grant Manager | Click here to enter text. |
| Date Onsite | Click here to enter text. |

APPLICABILITY

1.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Does the project involve?  Housing rehabilitation (including reduction and abatement of lead-based paint hazards?  or  Housing construction?  Other public construction?  [[24 CFR 135.3(a)(2)](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_13)] | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

THRESHOLDS

2.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Is the award to the Subrecipient greater than $200,000?  [[24 CFR 135.3(a)(3)(ii)(A)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5" \l "se24.1.135_13)  If No Section 3 does not apply.  If yes, does the value of work for any contractor or subcontractor exceed $100,000? [[24 CFR 135.3(a)(3)(ii)(A)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_13)]  If no, Section 3 does not apply. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

CONSTRUCTION DOCUMENTS

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the bid package contain the Section 3 Requirements? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the construction contract contain the Section 3 Requirements? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

5.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the construction file include copies of contractor/sub-contractor certifications for Section 3? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

SECTION 3 POLICIES AND DOCUMENTATION

6.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include written procedures governing:   * 1. How Section 3 residents are to be notified about employment and training opportunities generated by Subrecipient or its contractors as a result of the expenditure of covered financial assistance? [[24 CFR 135.32(a)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)]   2. How Section 3 business concerns are to be notified about contracting (or subcontracting) opportunities generated by the Subrecipient or its contractors involving covered financial assistance?   3. How potential contractors for covered projects or Subrecipients of covered funds are to be notified about their requirements pursuant to Section 3? [[24 CFR 135.32(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)] and [[24 CFR 135.32(f)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)]   4. How covered contractors and Subrecipients are to be monitored for compliance with the requirements of Section 3?   [[24 CFR 135.32(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)] and [[24 CFR 135.32(f)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)]   * 1. Steps taken by the Subrecipient to facilitate meeting the minimum numerical goals for employment and contracting opportunities? [[24 CFR 135.32(c)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)]   2. Did the Subrecipient provide evidence and/or documentation of the procedures described above? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

USE OF SECTION 3 RESIDENTS AS TRAINEES

7.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records indicate:   * 1. The total number of training positions generated by the Subrecipient or its contractors?   2. The number of training positions generated by the Subrecipient or its contractors identified above that was provided to Section 3 residents?   3. Description of how the Subrecipient or its contractors determined the eligibility for Section 3 residents? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

USE OF SECTION 3 RESIDENTS AS EMPLOYEES

8.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   * 1. The total number of permanent full-time positions generated by the Subrecipient or its contractors as a result of the expenditure of covered funding? [[24 CFR 135.30(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)]   2. The number of permanent full-time positions generated by the Subrecipient or its contractors identified above that was filled by Section 3 residents? [[24 CFR 135.30(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)]   3. Description of how the Subrecipient or its contractors determined eligibility of Section 3 residents? [[24 CFR 135.34(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_134) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

9.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. Whether the minimum numerical goal for employment was met by the Subrecipient or its contractors [30% of the aggregate number of new hires was Section 3 residents]?   [[24 CFR 135.30(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)]   1. If the minimum numerical goal for employment was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal? [[24 CFR 135.30(d)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

CONTRACT AWARDS TO SECTION 3 BUSINESS CONCERNS

10.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. The total dollar amount of covered construction contracts generated as a result of the expenditure of covered financial assistance? [[24 CFR 135.30(c)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] 2. The total dollar amount of covered construction contracts (or subcontracts) listed above that were awarded to Section 3 business concerns? [[24 CFR 135.30(c)(1)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] 3. Description of how the Subrecipient or its contractors determined the eligibility of Section 3 business concerns?   [[24 CFR 135.36(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_136) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** | |

11.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. Whether the minimum numerical goal for contracting was met by the Subrecipient or its contractors [10% of the total dollar amount of covered construction contracts were awarded to Section 3 business concerns]?  [[24 CFR 135.30(c)(1)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5" \l "se24.1.135_130) 2. If the minimum numerical goal for construction contracts was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal? [[24 CFR 135.30(d)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

NON-CONSTRUCTION BUSINESSES

12.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. The total dollar amount of covered **non-construction** contracts generated as a result of the expenditure of covered financial assistance? [[24 CFR 135.30(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] 2. The total dollar amount of covered **non-construction** contracts (or subcontracts) listed above that were awarded to Section 3 business concerns? [[24 CFR 135.30(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] 3. Description of how the Subrecipient or its contractors determined the eligibility of Section 3 business concerns?   [[24 CFR 135.36(b)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_136) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

13.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. Whether the minimum numerical goal for contracting was met by the Subrecipient or its contractors [3% of the total dollar amount of covered non-construction contracts were awarded to Section 3 business concerns]?  [[24 CFR 135.30(c)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5" \l "se24.1.135_130) 2. If the minimum numerical goal for non-construction contracts was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal?   [[24 CFR 135.30(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

PROCUREMENT PROCEDURES

14.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. Notification of covered contractors regarding their responsibilities pursuant to the requirements of Section 3?   [[24 CFR 135.30(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)]   1. Monitoring covered contractors for compliance with Section 3? [[24 CFR 135.30(c)(2)]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130) 2. The imposition of penalties upon contractors for noncompliance, including refraining from entering into contracts with any contractor that has violated the requirements of Section 3? [[24 CFR 135.36(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_136)] 3. Whether covered solicitations (RFPs, RFQs, IFBs, etc.) contain the Section 3 clause found at [[24 CFR 135.38](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_138)] or otherwise indicates the applicability of Section 3 to the covered project? [[24 CFR 135.30(c)(2)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] 4. If the minimum numerical goal for non-construction contracts was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal?   [[24 CFR 135.30(d)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

REPORTING AND RECORDKEEPING

15.

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| For the time period reviewed, did the Subrecipient’s records include information about:   1. Has a Section 3 Report been completed and submitted to DOLA? [[24 CFR Part 135.90]](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_190) 2. For the time period reviewed, did the Subrecipient’s records include documentation of the actions taken to comply with the Section 3 regulations? (Such documentation may include the results of the actions taken and any impediments encountered during the implementation of the program(s) covered by Section 3.) [[24 CFR 135.32(e)](http://www.ecfr.gov/cgi-bin/text-idx?SID=76355cf49717a96f2891216030e7c7f3&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** |  |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

# APPENDIX 1:

## Sample Monitoring Visit Letter

Honorable John Smith

Mayor, City of Someplace

Post Office Box 123456

Someplace, Colorado 99999

RE: Monitoring Visit

CDBG-DR Public Facilities Program Contract Number 777777

Dear Mayor Smith:

This letter is to confirm that John Doe, Jane Public, and Fred Jones will conduct a comprehensive review of your FY 20xx Community Development Block Grant Disaster Recovery (CDBG-DR) Program on March 13, 20xx. They should arrive at the City Hall between 1:30 p.m. and 2:30 p.m. They will want to talk to the people carrying out the program as well as review program files and visit the project site(s). A list of the program areas that will be reviewed is attached. Please have all files available for their review.

Please ensure that the following specific items are available for their review: (1) inspection reports for the street project which may be obtained from your engineer and (2) current proof of bonding covering those who handle CDBG-DR financial transactions, which, if not on file, may be obtained from your insurer.

It is required that you or your representative attend the exit conference that will be held at the conclusion of the review.

If you have any questions, please contact Fred Jones at (000) 000‐0000.

Sincerely,

XXXXXXXXXX

Community Development Block Grant Program-Disaster Recovery

**PROGRAM AREAS (Include in the Monitoring Visit Letter the areas to be monitored)**

NATIONAL OBJECTIVE

PROGRAM PARTICPANT’s files will be reviewed to verify that the program national objective documentation is in accordance with the requirements of 24 CFR 570.506.

The program was funded to meet the Low-Moderate Income housing national objective, 24 CFR 570.483(b)(3). The records of individual beneficiaries of the program should be available. That must include the homebuyers’ household income and the methodology or worksheet used to determine the homebuyers’ household income.

DISASTER RECOVERY

PROGRAM PARTICPANT’s files will be reviewed for compliance with the Disaster Recovery appropriation, Public Law 113-2, and the corresponding HUD regulations requiring funds to be used for necessary expenses related to disaster relief, long term recovery, and restorations of infrastructure, housing, and economic revitalization in areas affected by the 2008 natural disasters.

ENVIRONMENTAL REVIEW RECORD

PROGRAM PARTICPANT’s files will be reviewed to determine compliance with the requirements of 24 CFR Part 58. The files to be reviewed will include a description of project(s) and activities, the State's approval of environmental certification and request for release for funds OR written documentation signed by certifying officer that project meets qualifications for exemption.

FINANCIAL MANAGEMENT

PROGRAM PARTICPANT’s financial management records will be reviewed to determine whether the program was in compliance with the requirements of 24 CFR 85.20 and 85.21. PROGRAM PARTICPANT’s accounting records, bank statements, interim financial statements, source documents, and documentation relating to internal controls need to be available. Also as part of the financial management review please have current proof of bonding covering those who handle financial transactions for this grant, which, if not on file, may be obtained from your insurer. Please make available records pertaining to the program income received per the approved PROGRAM PARTICPANT Program Income Re-Use Plan.

ACQUISITION

PROGRAM PARTICPANT’s acquisition records will be reviewed to determine whether the program was in compliance with the requirements of 49 CFR Part 24. PROGRAM PARTICPANT’s acquisition notification records, appraisals, negotiation instruments, source documents, and other documentation relating to internal controls need to be available.

FAIR HOUSING/EQUAL OPPORTUNITY

The project files will be reviewed to insure compliance with the program’s Fair Housing requirements of 24 CFR 91.520(a); the Section 504 requirements of 24 CFR Part 8; the Equal Opportunity documentation requirements of 24 CFR 506(g)(2); and the Section 3 requirements of 24 CFR Part 135. The Subrecipient’s Fair Housing ordinance, self-evaluation, and transition plan (if applicable), appointment of Section 504 coordinator, Subrecipient’s grievance procedure, and files related to Section 3 employment and business opportunities need to be available.

LABOR STANDARDS

The project files will be reviewed to determine compliance with the requirements of 29 CFR Part 5. The appointment of a labor compliance officer, construction contracts, wage decisions, payrolls, and records of interviews should be available.

# APPENDIX 2:

## Sample Monitoring Letter

DATE

Honorable John Smith

Mayor, City of Someplace

Post Office Box 123456

Someplace, Colorado 99999

RE: Monitoring Report

CDBG-DR Public Facilities Program

Contract Number 777777

Dear Mr. Smith:

On March 13, 20xx, a visit to the City was conducted for the purpose of monitoring your FY 20xx Community Development Block Grant-Disaster Recovery (CDBG-DR) program. The courtesy and cooperation extended to our staff during the visit is appreciated.

During the visit a review of selected items was undertaken in the following program areas: (a) Acquisition, (b) Citizen Participation, (c) Labor Standards, (d) Environmental Review, (e) Fair Housing/Equal Opportunity and 504 Requirements, (f) Financial Management, (g) Labor Standards, (h) National Objectives, (i) Procurement, (j) Program Performance, (k) Public Facility Improvements, and (l) Record Keeping.

Our review indicated that you have the continuing capacity to carry out the program activities in a timely manner. The program has been implemented in accordance with the requirements and primary objectives of the Housing and Community Development Act and other applicable laws, with the exceptions identified herein. Although other deficiencies may exist, they were not detected during our review.

FINDINGS OF DEFICIENCY

CITIZEN PARTICIPATION

The citizen participation files were reviewed for completeness and accuracy.

Honorable John Smith

Date

Page 2

Finding Number 777777‐1‐1‐131

The City’s Citizen Participation Plan was adopted on December 11, 20xx, which was after the public hearing on September 30, 20xx. Regulation states, “The local Citizen Participation Plan must be made available to the public at the first public hearing.”

Corrective Action Required: The City must send us an explanation as to why the program requirements for the timely adoption of the Citizen Participation Plan and presentation at the public hearing were not followed and written assurance that required Citizen Participation procedures will be followed under the remainder of this program.

Finding Number 777777‐1‐1‐132

During our review we noted that the City did not have a roster of attendance or minutes of the first public hearing.

Corrective Action Required: The City must provide us with an explanation as to why there was no roster of attendance and minutes of the first public hearing and written assurance that program requirements regarding Citizen Participation will be followed under the remainder of this program.

PROCUREMENT

The City’s general files on procurement were reviewed in addition to the procurement procedures utilized in hiring consulting and engineering services.

Finding Number 777777‐1‐1‐081

We received documentation which indicated that engineering costs were reviewed for reasonableness, but such documentation was not signed until the day of our monitoring visit. Part 85 of the regulations state that a price or cost analysis be performed prior to every procurement. Therefore, the cost or price analysis should have been completed prior to the execution of the contract with the engineering firm.

Corrective Action Required: The City must provide us a written explanation of the reason(s) why documentation which indicated that engineering costs were reviewed for reasonableness was not prepared and signed at the appropriate time.

Honorable John Smith

Date

Page 3

AREA OF CONCERN

FINANCIAL MANAGEMENT

A review of the financial management records of the City's FY 20xx CDBG-DR Program was conducted. The records were reviewed for compliance with OMB Circulars A‐87 and A‐102 and with other federal and state laws, regulations, and policies.

CDBG-DR Revenue for the fiscal year ending December 31, 20xx was not properly included in the City’s financial report. We note that funds associated with Request for Payment #1 were not requested until January 9, 20xx; however, revenue should have been accrued at the time of invoice approval for those invoices which were approved prior to December 31, 20xx. Please insure that all CDBG-DR funds are accounted for, including accrued amounts, in the upcoming financial report for the fiscal year ending December 31, 20xx.

FINDINGS OF MERIT

ACQUISITION

The City's files were reviewed to determine compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Acquisition of property was not necessary to carry out the street project according to a certification from the City’s Attorney, Surely Smart, Jr., dated June 10, 20xx.

LABOR STANDARDS

The City was found to be in compliance with federal labor standards requirements.

NATIONAL OBJECTIVES

Program benefit was reviewed by our staff. Based on the local survey forms and an inspection of the target area, it appears that approximately seventy‐five percent of the persons benefiting from the fire protection project are of low and moderate income. Therefore, the City was found to be in compliance with the national objective requirements of 24 CFR 570.483 (b) (1).

Honorable John Smith

Date

Page 4

PROGRAM PERFORMANCE

The City’s progress in completing the program activities in accordance with the Performance Schedule contained in your grant agreement under the CDBG-DR Program was reviewed. The City’s project has progressed in a timely manner. The fire protection project will be completed prior to the contract termination date of August 24, 20XX.

RECORD KEEPING

The City is maintaining the program records in accordance with the State's program requirements. When the staff requested specific information during the monitoring visit, the supporting documentation was easily retrievable.

Please submit the items required to address the findings of deficiency to us no later than April 30, 20XX. Also, please make a copy of this letter available to your auditor, who will determine which of the above noted deficiencies, if any, are material and should be included in any of the applicable financial reports. Your cooperation in this matter is appreciated. Should you have any questions, please call Fred Jones at (000) 000‐0000.

Sincerely,

# APPENDIX 3:

## Citation Summary

| **Citation** | **Date** | **Comment** | **Main Focus** |
| --- | --- | --- | --- |
| [2 CFR 200.330](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1330&rgn=div8) | December 7, 2015 | Subrecipient and Contractor Monitoring | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [2 CFR 200.333](https://www.ecfr.gov/cgi-bin/text-idx?node=se2.1.200_1333&rgn=div8) | December 7, 2015 | Retention Requirements for Records | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [2 CFR 400](https://www.ecfr.gov/cgi-bin/text-idx?SID=96ea75fd74bd92e1ff1744fc05f15e4f&node=pt2.1.400&rgn=div5) | December 7, 2015 | Cost Principles - Policy Guide | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [2 CFR 200.302](https://www.ecfr.gov/cgi-bin/text-idx?SID=a32963af34d3c94b854882a21e8d77e9&mc=true&node=se2.1.200_1302&rgn=div8) | December 7, 2015 | Financial management | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [2 CFR 200.313](https://www.ecfr.gov/cgi-bin/text-idx?SID=c16296aecfef71d582e0634cf6658cf1&node=2:1.1.2.2.1.4.30.14&rgn=div8) | December 7, 2015 | Property Standards for Equipment | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [2 CFR 200.317-326](https://www.ecfr.gov/cgi-bin/text-idx?node=2:1.1.2.2.1.4.31&rgn=div7) | December 7, 2015 | Procurement Standards | Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award |
| [24 CFR 135.3](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_13) | December 7, 2015 | Amend § 135.36(c) by removing ‘‘24 CFR 85.36 (see 24 CFR 85.36(b)(8)).)’’ and adding in its place ‘‘2 CFR 200.318(h).)’’. | Section 3 Requirements |
| [24 CFR 135.3](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_13) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.30](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.30](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_130) | December 7, 2015 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.32](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.32](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_132) | December 7, 2015 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.34](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_134) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.34](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_134) | December 7, 2015 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.36](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_136) | December 7, 2015 | Amend § 135.36(c) by removing ‘‘24 CFR 85.36 (see 24 CFR 85.36(b)(8)).)’’ and adding in its place ‘‘2 CFR 200.318(h).)’’. | Section 3 Requirements |
| [24 CFR 135.36](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_136) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.38](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_138) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.38](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_138) | December 7, 2015 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.90](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_190) | June 30, 1994 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 135.90](https://www.ecfr.gov/cgi-bin/text-idx?SID=b3a9ba9efe287c9d672529e3620b90c6&mc=true&node=pt24.1.135&rgn=div5#se24.1.135_190) | December 7, 2015 | Pre Disaster Declaration in Colorado | Section 3 Requirements |
| [24 CFR 570.200](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1200) | November 3, 2015 | 80 FR 67633 This final rule amends HUD's Section 108 Loan Guarantee Program (Section 108 Program) regulations to permit HUD to collect fees from Section 108 borrowers to offset the credit subsidy costs of Section 108 loan guarantees. | General Policies |
| [24 CFR 570.200](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1200) | November 12, 2015 | 80 FR 69870 §570.200 General policies. (g) Limitation on planning and administrative costs—(1) Origin year grant expenditure test. For origin year 2015 grants and subsequent grants, no more than 20 percent of any origin year grant shall be expended for planning and program administrative costs, as defined in §§570.205 and 570.206, respectively. Expenditures of program income for planning and program administrative costs are excluded from this calculation. (2) Program year obligation test. For all grants and recipients subject to subpar D, the amount of CDBG funds obligated during each program year for planning plus administrative costs, as defined in §§570.205 and 570.206, respectively, shall be limited to an amount no greater than 20 percent of the sum of the grant made for that program year (if any) plus the program income received by the recipient and its subrecipients (if any) during that program year. For origin year 2015 grants and subsequent grants, recipients must apply this test consistent with paragraph (g)(1) of this section. (3) Funds from a grant of any origin year may be used to pay planning and program administrative costs associated with any grant of any origin year. (k) Any unexpended CDBG origin year grant funds in the United States Treasury account on September 30 of the fifth Federal fiscal year after the end of the origin year grant’s period of availability for obligation by HUD will be canceled. HUD may require an earlier expenditure and draw down deadline under a grant agreement. | General Policies |
| [24 CFR 570.200](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1200) | December 7, 2015 | 80 FR 75936 | General Policies |
| [24 CFR 570.200](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1200) | August 17, 2007 | Pre Disaster Declaration in Colorado | General Policies |
| [24 CFR 570.201](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1201) | November 12, 2015 | [§570.201 Amended] ■ 9. Amend §570.201 as follows: ■ a. In paragraph (e)(1), add ‘‘non-entitlement CDBG grants in Hawaii, and for recipients of insular area funds under section 106 of the Act,’’ following ‘‘subpart D of this part,’’ both times such language appears; and ■ b. In paragraph (e)(2), remove ‘‘Federal fiscal year’’ and add in its place ‘‘origin year’’ | Basic Eligible Activities |
| [24 CFR 570.201](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1201) | May 24, 2006 | Pre Disaster Declaration in Colorado | Basic Eligible Activities |
| [24 CFR 570.203](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1203) | May 24, 2006 | Pre Disaster Declaration in Colorado | Special Economic Development Activity |
| [24 CFR 570.207](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1207) | December 7, 2015 | Amend § 570.207 as follows: ■ a. In paragraph (a)(2), remove ‘‘OMB Circular A–87’’ and add in its place ‘‘2 CFR part 200, subpart E’’; ■ b. In paragraph (b)(1)(i), remove ‘‘, depreciation, or use allowances pursuant to OMB Circulars A–21, A–87 or A–122’’ and add in its place ‘‘or depreciation pursuant to 2 CFR part 200, subpart E,’’; and ■ c. In paragraph (b)(1)(iii), remove ‘‘or use allowances (in accordance with OMB Circulars A–21, A–87 or A–122, as applicable)’’ and add in its place ‘‘in accordance with 2 CFR part 200, subpart E,’’. | Ineligible Activities |
| [24 CFR 570.207](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1207) | November 21, 2000 | Pre Disaster Declaration in Colorado | Ineligible Activities |
| [24 CFR 570.208](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1208) | August 17, 2007 | Pre Disaster Declaration in Colorado | National Objective |
| [24 CFR 570.209](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1209) | August 17, 2007 | Pre Disaster Declaration in Colorado | Guidelines for evaluating and selecting economic development projects |
| [24 CFR 570.482](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1482) | May 24, 2006 | Pre Disaster Declaration in Colorado | Eligible Activities |
| [24 CFR 570.483](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1483) | May 24, 2006 | Pre Disaster Declaration in Colorado | National Objective |
| [24 CFR 570.490](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1490) | July 16, 2015 | In § 570.490, paragraphs (a)(1) and (b) are revised to read as follows: § 570.490 Recordkeeping requirements. (a) State records. (1) The State shall establish and maintain such records as may be necessary to facilitate review and audit by HUD of the State’s administration of CDBG funds under § 570.493. The content of records maintained by the State shall be as jointly agreed upon by HUD and the States and sufficient to enable HUD to make the determinations described at § 570.493. For fair housing and equal opportunity purposes, and as applicable, such records shall include documentation related to the State’s AFH, as described in 24 CFR part 5, subpart A (§ 5.168). The records shall also permit audit of the States in accordance with 24 CFR part 85. \* \* \* \* \* (b) Unit of general local government’s record. The State shall establish recordkeeping requirements for units of general local government receiving CDBG funds that are sufficient to facilitate reviews and audits of such units of general local government under §§ 570.492 and 570.493. For fair housing and equal opportunity purposes, and as applicable, such records shall include documentation related to the State’s AFH as described in 24 CFR part 5, Subpart A (§ 5.168). | Record Keeping |
| [24 CFR 570.490](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1490) | December 7, 2015 | On December 19, 2014, the Office of Management and Budget (OMB) published a joint, Government wide interim rule with all Federal award-making agencies, entitled “Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.” In that rule, all Federal award-making agencies, including HUD, implemented the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. HUD also amended its administrative requirements for grants and cooperative agreements. This final rule conforms HUD's regulations to OMB's rule, revises cross references within affected HUD regulations, and makes other conforming changes and corrections. Through this rule, HUD commits to provide states, local governments, public housing agencies (PHAs), the communities they serve, and the general public, to the fullest extent possible, with local and regional data on integrated and segregated living patterns, racially or ethnically concentrated areas of poverty, the location of certain publicly supported housing, access to opportunity afforded by key community assets, and disproportionate housing needs based on classes protected by the Fair Housing Act. Through the availability of such data and available local data and knowledge, the approach provided by this rule is intended to make program participants better able to evaluate their present environment to assess fair housing issues such as segregation, conditions that restrict fair housing choice, and disparities in access to housing and opportunity, identify the factors that primarily contribute to the creation or perpetuation of fair housing issues, and establish fair housing priorities and goals. | Record Keeping |
| [24 CFR 570.490](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1490) | April 23, 2012 | Pre Disaster Declaration in Colorado | Record Keeping |
| [24 CFR 570.503](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1503) | November 12, 2015 | 80 FR 69873 | Agreements with Subrecipients |
| [24 CFR 570.503](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1503) | December 7, 2015 | 80 FR 75938 | Agreements with Subrecipients |
| [24 CFR 570.503](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1503) | September 29, 2003 | Pre Disaster Declaration in Colorado | Agreements with Subrecipients |
| [24 CFR 570.506](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506) | November 12, 2015 | §570.506 Records to be maintained.\* \* \* \* \* (h) Financial records, in accordance with the applicable requirements listed in §570.502, including source documentation for entities not subject to 2 CFR part 200. Grantees shall maintain evidence to support how the CDBG funds provided to such entities are expended. Such documentation must include, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity. Grantee records pertaining to obligations, expenditures, and drawdowns must be able to relate financial transactions to either a specific origin year grant or to program income received during a specific program year. | Records to be Maintained |
| [24 CFR 570.506](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506) | July 16, 2015 | 80 FR 42368 Through this final rule, HUD provides HUD program participants with an approach to more effectively and efficiently incorporate into their planning processes the duty to affirmatively further the purposes and policies of the Fair Housing Act, which is title VIII of the Civil Rights Act of 1968. The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD's program participants to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination. The approach to affirmatively furthering fair housing carried out by HUD program participants prior to this rule, which involved an analysis of impediments to fair housing choice and a certification that the program participant will affirmatively further fair housing, has not been as effective as originally envisioned. This rule refines the prior approach by replacing the analysis of impediments with a fair housing assessment that should better inform program participants' planning processes with a view toward better aiding HUD program participants to fulfill this statutory obligation. | Records to be Maintained |
| [24 CFR 570.506](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1506) | December 23, 2005 | Pre Disaster Declaration in Colorado | Records to be Maintained |
| [24 CFR 570.509](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1509) | December 7, 2015 | Amend § 570.509 as follows: ■ a. In paragraph (e), remove ‘‘24 CFR 85.44’’ and add in its place ‘‘2 CFR 200.339’’; and ■ b. In paragraph (f), remove ‘‘24 CFR 85.43(c)’’ and add in its place ‘‘2 CFR 200.342’’. | General Close Out Procedures |
| [24 CFR 570.509](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1509) | November 12, 2015 | §570.509 Grant closeout procedures. (a) Criteria for closeout. HUD may make grant closeout determinations for individual grants or multiple grants simultaneously. A grant will be closed out when HUD determines, in consultation with the recipient, that the following criteria have been met: (1) All costs to be paid with CDBG funds from a given origin year’s grant have been expended and drawn down, with the exception of closeout costs (e.g., audit costs) and costs resulting from contingent liabilities described in the closeout agreement pursuant to paragraph (c) of this section. Contingent liabilities include, but are not limited to, third-party claims against the recipient, as well as related administrative costs. (2) All activities for which funds were expended from the origin year grant are physically completed, are eligible, have met a national objective under §570.208, and the grantee has reported on all accomplishments resulting from the activity. (3) A final performance and expenditure report for completed activities has been submitted to HUD pursuant to 24 CFR 91.520, and HUD has determined the plan is satisfactory. (4) All program income received by the grantee during the grantee program year associated with the origin year grant has been expended, or identified in a more recent program year’s Action Plan, pursuant to 24 CFR 91.220(l). (5) For origin year 2015 grants and subsequent grants, the grantee has expended no more than 20 percent of the origin year grant for planning and program administrative costs, under §570.200(g)(1). (6) Other responsibilities of the recipient under the grant agreement and applicable laws and regulations appear to have been carried out satisfactorily or there is no further Federal interest in keeping the grant agreement open for the purpose of securing performance. (b) \* \* \* (2) \* \* \* Any funds which have exceeded the statutory time limit on the use of funds will be recaptured by the U.S. Treasury pursuant to 24 CFR 570.200(k). \* | General Close Out Procedures |
| [24 CFR 570.509](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1509) | March 30, 1995 | Pre Disaster Declaration in Colorado | General Close Out Procedures |
| [24 CFR 570.511](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1511) | December 7, 2015 | Amend § 570.511(a)(2) by removing ‘‘24 CFR 85.36’’ and adding in its place ‘‘2 CFR part 200, subpart D’’. | Use of escrow accounts for rehabilitation of privately owned residential property. |
| [24 CFR 570.511](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1511) | August 8, 1990 | Pre Disaster Declaration in Colorado | Use of escrow accounts for rehabilitation of privately owned residential property. |
| [24 CFR 570.513](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1513) | December 7, 2015 | ‘Payment’’ is modified for lump sum drawdown for financing of property rehabilitation activities, in accordance with § 570.513. | Lump sum drawdown for financing of property rehabilitation activities. |
| [24 CFR 570.513](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1513) | November 12, 2015 | §570.509 Grant closeout procedures. (a) Criteria for closeout. HUD may make grant closeout determinations for individual grants or multiple grants simultaneously. A grant will be closed out when HUD determines, in consultation with the recipient, that the following criteria have been met: (1) All costs to be paid with CDBG funds from a given origin year’s grant have been expended and drawn down, with the exception of closeout costs (e.g., audit costs) and costs resulting from contingent liabilities described in the closeout agreement pursuant to paragraph (c) of this section. Contingent liabilities include, but are not limited to, third-party claims against the recipient, as well as related administrative costs. (2) All activities for which funds were expended from the origin year grant are physically completed, are eligible, have met a national objective under §570.208, and the grantee has reported on all accomplishments resulting from the activity. (3) A final performance and expenditure report for completed activities has been submitted to HUD pursuant to 24 CFR 91.520, and HUD has determined the plan is satisfactory. (4) All program income received by the grantee during the grantee program year associated with the origin year grant has been expended, or identified in a more recent program year’s Action Plan, pursuant to 24 CFR 91.220(l). (5) For origin year 2015 grants and subsequent grants, the grantee has expended no more than 20 percent of the origin year grant for planning and program administrative costs, under §570.200(g)(1). (6) Other responsibilities of the recipient under the grant agreement and applicable laws and regulations appear to have been carried out satisfactorily or there is no further Federal interest in keeping the grant agreement open for the purpose of securing performance. (b) \* \* \* (2) \* \* \* Any funds which have exceeded the statutory time limit on the use of funds will be recaptured by the U.S. Treasury pursuant to 24 CFR 570.200(k). \* | Lump sum drawdown for financing of property rehabilitation activities. |
| [24 CFR 570.513](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1513) | November 12, 2015 | §570.513 Lump sum drawdown for financing of property rehabilitation activities. \* \* \* \* \* (b) \* \* \* (7) \* \* \* Any program income which will be governed by a new agreement must be identified in the current program year Action Plan, pursuant to 24 CFR 91.220(l). \* | Lump sum drawdown for financing of property rehabilitation activities. |
| [24 CFR 570.513](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1513) | March 30, 1995 | Pre Disaster Declaration in Colorado | Lump sum drawdown for financing of property rehabilitation activities. |
| [24 CFR 570.513](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1513) | March 11, 1998 | Pre Disaster Declaration in Colorado | Lump sum drawdown for financing of property rehabilitation activities. |
| [24 CFR 570.605](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1605) | March 20, 1996 | Pre Disaster Declaration in Colorado | National Flood Insurance Program |
| [24 CFR 570.609](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1609) | February 9, 1996 | Pre Disaster Declaration in Colorado | Use of debarred, suspended or ineligible contractors or subrecipients. |
| [24 CFR 58.22](https://www.ecfr.gov/cgi-bin/text-idx?SID=9b5a5ad0abc2732183731e85a6280fdd&mc=true&node=se24.1.58_122&rgn=div8) | September 29, 2003 | Pre Disaster Declaration in Colorado | Environmental Regulations |
| [24 CFR 58.34](https://www.ecfr.gov/cgi-bin/text-idx?SID=d098897e81508415cf8ef9e70c14f306&node=24:1.1.1.1.33.4.71.4&rgn=div8) | March 30, 1998 | Pre Disaster Declaration in Colorado | Environmental Regulations |
| [24 CFR 58.35](https://www.ecfr.gov/cgi-bin/text-idx?SID=d098897e81508415cf8ef9e70c14f306&node=24:1.1.1.1.33.4.71.5&rgn=div8) | September 29, 2003 | Pre Disaster Declaration in Colorado | Environmental Regulations |
| [24 CFR 58.35](https://www.ecfr.gov/cgi-bin/text-idx?SID=d098897e81508415cf8ef9e70c14f306&node=24:1.1.1.1.33.4.71.5&rgn=div8) | November 12, 2013 | This final rule revises HUD's regulations governing the protection of wetlands and floodplains. With respect to wetlands, the rule codifies existing procedures for Executive Order 11990 (E.O. 11990), Protection of Wetlands. HUD's policy has been to require the use of the 8-Step Process for floodplains for wetlands actions performed by HUD or actions performed with HUD financial assistance. This rule codifies this wetlands policy and improves consistency and increases transparency by placing the E.O. 11990 requirements in regulation. | Environmental Regulations |
| [24 CFR 8.21](https://www.gpo.gov/fdsys/granule/CFR-2000-title24-vol1/CFR-2000-title24-vol1-sec8-21) | November 12, 1989 | Pre Disaster Declaration in Colorado | Section 504 Regulations |
| [24 CFR 8.53](https://www.ecfr.gov/cgi-bin/text-idx?SID=7edb66a90bce14a1cc63ad2b65cace29&mc=true&node=se24.1.8_153&rgn=div8) | September 7, 1998 | Pre Disaster Declaration in Colorado | Section 504 Regulations |
| [24 CFR 8.54](https://www.gpo.gov/fdsys/granule/CFR-2000-title24-vol1/CFR-2000-title24-vol1-sec8-54) | September 7, 1998 | Pre Disaster Declaration in Colorado | Section 504 Regulations |
| [24 CFR 8.6](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24%3A1.1.1.1.8&se24.1.8_16) | July 26, 1988 | Pre Disaster Declaration in Colorado | Section 504 Regulations |
| [49 CFR 24.10](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_110) | January 4, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.102](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1102) | January 4, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.102](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1102) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.2](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_12) | January 4, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.203](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1203) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.205](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1205) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.207](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1207) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.208](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1208) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.401](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1401) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.402](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1402) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.403](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1403) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [49 CFR 24.404](https://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;sid=6afae2fe1827570c30473746a5505ce7;rgn=div5;view=text;node=49%3A1.0.1.1.18;idno=49;cc=ecfr#se49.1.24_1404) | May 2, 2005 | Pre Disaster Declaration in Colorado | PART 24—UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION |
| [Vol 76, 221](https://www.gpo.gov/fdsys/pkg/FR-2011-11-16/pdf/2011-29634.pdf) | November 16, 2011 | Pre Disaster Declaration in Colorado | CDBG-DR Regulation |
| [Vol. 78, No. 103](https://www.gpo.gov/fdsys/pkg/FR-2013-05-29/pdf/2013-12780.pdf) | May 29, 2013 | CDBG-DR Regulation | CDBG-DR Regulation |
| [Vol. 78, No. 222](https://www.gpo.gov/fdsys/pkg/FR-2013-11-18/pdf/FR-2013-11-18.pdf) | November 18, 2013 | b. Liquid Fuel Supply Chain Assistance. The March 5, 2013 Notice, paragraph (d)(3) at 78 FR 14335, and paragraph 41 at 78 FR 14347, are amended, as necessary, to require the following: If a grantee provides CDBG– DR assistance to a small business in the liquid fuel supply chain, the award agreement must require the adoption of measures to mitigate impacts to the liquid fuel supply chain during future disasters. Risk mitigation measures should include processes or methods to ensure that fueling stations along critical evacuation routes remain functional, or quickly restore functionality, during power outages. This requirement applies to any small business in the liquid fuel supply chain that applies for CDBG–DR assistance after the effective date of this Notice. Grantees are reminded that pursuant to the March 5, 2013 Notice, grantees are prohibited from assisting businesses, including private utilities, that do not meet the definition of a small business as defined by SBA at 13 CFR part 121 and as further modified by this Notice. Please review the modified definition of a small business in paragraph 10 of this section of the Notice, particularly with regard to businesses covered by this section. | Federal Register Notices DR Policies |
| [Vol. 78, No. 222](https://www.gpo.gov/fdsys/pkg/FR-2013-11-18/pdf/FR-2013-11-18.pdf) | November 18, 2013 | CDBG-DR Regulation | Federal Register Notices DR Policies |
| [Vol. 78, No. 43](https://www.gpo.gov/fdsys/pkg/FR-2013-03-05/pdf/2013-05170.pdf) | March 5, 2013 | 1st CDBG-Disaster Regulation for Sandy | CDBG-DR Regulation |
| [Vol. 79, No. 106](https://www.gpo.gov/fdsys/pkg/FR-2014-06-03/pdf/2014-12709.pdf) | June 3, 2014 | Additional Requirements for Major Infrastructure Projects. Action Plan Amendments that propose a major infrastructure project will not be approved unless the project meets the criteria of this Notice. HUD approval is required for each major infrastructure project with such projects defined as having a total cost of $50 million or more (including at least $10 million of CDBG–DR funds), or physically located in more than one county. Additionally, two or more related infrastructure projects that have a combined total cost of $50 million or more (including at least $10 million of CDBG–DR funds) must be designated as major infrastructure projects. Projects encompassed by this paragraph are herein referred to as ‘‘Covered Projects.’’ Prior to funding a Covered Project, the grantee must incorporate each of the following elements into its Action Plan (i.e., via a substantial Action Plan Amendment): **AUGUST 25, 2015 ADDED** 1. Exemptions from Infrastructure Program and Project Requirements— Obligated Assistance from Federal Grant Program Projects and Completed Projects—(Hurricane Sandy Grantees only). The March 27, 2014, Federal Register notice, at paragraph II.1.b., Obligated Public Assistance Grant Program Projects (78 FR 17174), provides an exemption from certain infrastructure requirements described in paragraph 2 of the Federal Register notice published November 18, 2013, at 78 FR 69107, for those projects to which the Federal Emergency Management Agency (FEMA) had obligated Public Assistance (PA) funds on or before November 25, 2013. After consideration of the factors discussed below, HUD is now modifying this exemption. As of the effective date of this notice, the infrastructure requirements described in paragraph 2 at 78 FR 69107 will not apply to an infrastructure project carried out by a Hurricane Sandy CDBG–DR grantee if FEMA or any other Federal agency has obligated funds to that infrastructure project on or before January 15, 2014, or if the infrastructure project was completed on or before January 15, 2014 | Federal Register Notices DR Policies |

# APPENDIX 4:

## Down Payment - Family Review Worksheet

**Housing Purchase (Down Payment Assistance) Program Family File Monitoring**

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| --- | --- | --- | --- | --- |
|  | | | | |
| **Grantee Name** |  | **Contract**  **Number** |  |  |

|  |
| --- |
| **OWNER INFORMATION** |
| 1. Name: 2. Number of family members: 3. Address: (current) 4. Address: (purchasing) 5. Evidence of direct disaster impact (disaster damage/destruction of property):   Yes  No   1. Are the owner and each household member of eligible immigration status?   Yes  No   1. Owner’s annual income: $ 2. Was income verified?   Yes  No  How was it verified?   1. What is the Homebuyer’s % of AMI? ­­­  ≤ 30% ≤ 40% ≤ 50% ≤ 60% ≤ 80% > 80% |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  | | --- | | **PURCHASE INFORMATION** |  1. What is the purchase price of the property to be purchased? $ 2. What is the appraised value of the property to be purchased? $       (Purchase price may not exceed appraised value.) 3. Please list purchase funding source and the amount received from each (Duplication of Benefit Analysis).  |  |  |  | | --- | --- | --- | | Funding Source | Funding Amount Received | Third Party Verified? | | 1st Mortgage | $ | Yes  No | | Pre-DOB UNMET NEED  (equals purchase price/appraised value minus 1st Mortgage): | $ |  | | FEMA | $ | Yes  No | | SBA | $ | Yes  No | | NFIP | $ | Yes  No | | Home Insurance | $ | Yes  No | | LTRG Unmet Need Program | $ | Yes  No | | Other, list: | $ | Yes  No | | **Total Benefit Received** | **$** | Yes  No | | Post-DOB UNMET NEED  (Equals Purchase Price minus  1st Mortgage and all Disaster Recovery Benefits): | $ |  |  1. Purchase value of the CDBG-DR funds loaned/granted? $ 2. Does CDBG-DR amount exceed unmet need? Yes  No |

|  |
| --- |
| **PURCHASE INFORMATION** |
| 1. Are the loan agreement(s) in the file? Yes  No    Purchase Contract Yes  No  If yes, Date Signed? Click here to enter a date.   HUD Settlement Statement Yes  No  If yes, Date Signed? Click here to enter a date.  Promissory Note Yes  No  If yes, Date Signed? Click here to enter a date.   Other Yes  No  If yes, Date Signed? Click here to enter a date.   1. What is the Date of Application? Click here to enter a date. 2. Does the HOME meets HQS standards? Yes  No 3. What is the date of the initial inspection? Click here to enter a date. |

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| **ENVIRONMENTAL** |
| 1. What date was the site specific environmental clearance issued? Click here to enter a date. 2. What date was the Release of Funds letter for the contract issued? Click here to enter a date. 3. Are lead based paint requirements met? Yes  No 4. Is there a copy of the notice in the file? Yes  No 5. Is property in a floodplain? Yes  No   *If YES, CDBG-DR cannot fund purchases in a flood plain*   1. Is property in a floodway? Yes  No     *If YES, CDBG-DR cannot fund purchases in a flood plain* |

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| **MONITORING** |
| 1. Has the grantee inspected the unit? Yes  No   If NO, indicate why not: Work not yet completed  If Other, explain: |

# APPENDIX 5:

## Housing Repair – Family File Review Worksheet

**Housing Repair Program Family File Monitoring**

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| --- | --- | --- | --- | --- |
|  | | | | |
| **Grantee Name** |  | **Contract**  **Number** |  |  |

|  |
| --- |
| **OWNER INFORMATION** |
| 1. Name: 2. Number of family members: 3. Address: 4. Evidence of direct disaster impact (disaster damage/destruction of property):   Yes  No   1. Are the owner and each household member of eligible immigration status?   Yes  No   1. Is there proof of ownership in the file? Yes  No  Document Type? 2. Owner’s annual income: $ 3. Was income verified? Yes  No  How was it verified? 4. What is the Homebuyer’s % of AMI?  ≤ 30% ≤ 40% ≤ 50% ≤ 60% ≤ 80% > 80% |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| |  | | --- | | **REHABILITATION INFORMATION** |  1. What was the appraised value of the property before disaster damage was incurred? $ 2. What was the amount of the damage assessment/cost of repairs/replacement? $ 3. How was damage documented? Photos  FEMA Inspection Report   Insurance Claim  Other  If other, please list:   1. Please list rehabilitation funding source and the amount received from each (Duplication of Benefit Analysis).  |  |  |  | | --- | --- | --- | | Funding Source | Funding Amount Received | Third Party Verified? | | FEMA | $ | Yes  No | | SBA | $ | Yes  No | | NFIP | $ | Yes  No | | Home Insurance | $ | Yes  No | | LTRG Unmet Need Program | $ | Yes  No | | Other, list: | $ | Yes  No | | **Total Benefit Received** (Equals total of sources above): | **$** | Yes  No | | Post-DOB UNMET NEED  (Equals amount of damage assessment from #11  minus Total Benefits Received): | $ |  |  1. What was the value of the CDBG-DR funds loaned/granted? $ 2. Does CDBG-DR amount exceed unmet need? Yes  No 3. Are the loan agreement(s) in the file? Yes  No     Deed of Trust Yes  No  If yes, Date Signed? Click here to enter a date.   Promissory Note Yes  No  If yes, Date Signed? Click here to enter a date.   Other Yes  No  If yes, Date Signed? Click here to enter a date. 4. Is the Owner/Contractor Agreement in the file? Yes  No  Date Signed? Click here to enter a date. 5. Does CDBG-DR amount exceed 50% of pre-disaster appraised value? Yes  No |

|  |  |
| --- | --- |
| |  | | --- | | **REHABILITATION INFORMATION** | |
| 1. Which rehabilitation standards were used?  State  Local   If Local, have standards been provided to Monitor? Yes  No   1. What is the date of the application? Click here to enter a date. 2. What is the date of the initial inspection? Click here to enter a date. 3. Is the work write-up in the file? Yes  No 4. What was the cost estimate? $   Please list three bids that were received and the amounts of each. If more bids were received, attach additional sheets, or bid analysis.   |  |  | | --- | --- | | Firm | Bid Amount | |  | $ | |  | $ | |  | $ |  1. Who was the accepted bid? 2. What was the accepted bid amount? $ 3. Was the contractor checked against the debarred list on www.sam.gov? Yes  No 4. Were lien waivers used? Yes  No 5. What was the date of inspection? Click here to enter a date. 6. Please list last three drawdown dates and amounts.  |  |  | | --- | --- | | Date of Drawdown | Amount | | Click here to enter a date. | $ | | Click here to enter a date. | $ | | Click here to enter a date. | $ |  1. What is the Certificate of Completion date? Click here to enter a date. 2. If a handicapped household, was accessibility addressed? Yes  No  N/A   If NO, explain why not. |

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| --- |
| **ENVIRONMENTAL** |
| 1. What date was the site specific environmental clearance issued? Click here to enter a date. 2. What date was the Release of Funds letter for the contract issued? Click here to enter a date. 3. Are lead based paint requirements met? Yes  No 4. Is there a copy of the notice in the file? Yes  No 5. Is property in a floodplain? Yes  No   If YES, has flood insurance been obtained? Yes  No   1. Is property in a floodway? Yes  No |

|  |
| --- |
| **MONITORING** |
| 1. Has the grantee inspected the unit? Yes  No   If NO, indicate why not: Work not yet completed  If Other, explain:   1. Has the Monitor inspected the unit? Yes  No 2. Does the unit conform to the work write-up / change orders? Yes  No   If NO, explain why not:   1. Were the rehabilitation standards met? Yes  No   If NO, what is corrective action?   1. Which work items still need completion and when will they be completed? |

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# APPENDIX 6:

## TRA - Tenant File Review Worksheet

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **CDOH CDBG-DR TENANT FILE REVIEW CHECKLIST** | | | | | | | | | | | | | |
| **GENERAL INFORMATION** | | | | | | **Move-In RENT INFORMATION** | | | | | | | |
| PROPERTY: | | | | | | TENANT RENT: | | | | | | | |
| AMI SET ASIDE (30%, 50%, etc.): | | | | | | UTILITY ALLOWANCE: | | | | | | | |
| PROJECT-BASED SUBSIDY? | | | | Yes | No | SUBSIDY AMOUNT (DR voucher): | | | | | | | |
| FILE REVIEW DATE: Click here to enter a date. | | | | | | GROSS RENT (T-rent+UA+Subsidy): | | | | | | | |
| PERFORMED BY: | | | | | | FMR: | | | | | | | |
|  |  |  |  |  |  | % AMI RENT LIMIT: | | | | | | | |
| **HOUSEHOLD INFORMATION** | | |  |  |  | RENT HIGHER THAN FMR? | | | | | Yes | | No |
| UNIT NUMBER: | | | | | | If yes, rent reasonableness demonstrated? | | | | | Yes | | No |
| UNIT SIZE: | | | | | | Rent reasonableness worksheet included? | | | | | Yes | | No |
| HEAD OF HOUSEHOLD: | | | | | | List rent reasonableness docs reviewed: | | | | | | | |
| CO-HEAD OF HOUSEHOLD: | | | | | |
| NUMBER IN HOUSEHOLD AT MOVE-IN: | | | | | | HOUSEHOLD RECEIVING CDBG-DR ASSISTANCE FROM OTHER PROGRAM(s)? | | | | | | | |
| NUMBER IN HOUSEHOLD AT REVIEW: | | | | | |  | | | | | Yes | | No |
| MOVE-IN DATE: Click here to enter a date. | | | MOVE-OUT DATE: Click here to enter a date. | | | DPA Housing Repair New Construction | | | | | | | |
|  |  |  |  |  |  |  |  | |  | |  |  | |
| **INITIAL ELIGIBILITY -- DATE** Click here to enter a date. | | | | | | | | | | | | | |
| Application complete, signed and dated: | | | | | Yes | No |  |  | |  | |  | |
| Residency Declaration for all household members: | | | | | |  | Yes | No | | N/A | |  | |
| Valid government-issued photo ID for all adult members: | | | | | | | Yes | No | |  | |  | |
| Tenant release consent form: | | | |  | Yes | No |  |  | |  | |  | |
| Evidence of direct disaster impact:  FEMA #:  SBA App #: | | | |  | Yes | No | Documents (list): | | | | | | |
| Duplication of Benefits analysis: | | | |  | Yes | No |  | |  | |  | |  |
| Signed agreement to report any changes in income: | | | | | | | Yes | | No | |  | |  |
| Lease complete with all members, signed, dated: | | | | | | | Yes | | No | |  | |  |
| Lease language requirement for annual recertification: | | | | | | | Yes | | No | |  | |  |
| Income & Asset questionnaire completed, signed & dated by all adults (may be in application): | | | | | | | | | | | Yes | | No |
| Total Household Income: | | | $ |  | 3rd Party Verified | | | |  | | Yes | | No |
| Income calculation OK: | | | Yes | No |  |  |  | |  | |  | |  |
| Income Limit: (AMI) | | | $ |  |  |  |  | |  | |  | |  |
| Any Assets at Move-In: | | | Yes | No | 3rd Party Verified | | | | N/A | | Yes | | No |
| **CDBG-DR ELIGIBLE AT MOVE-IN:** | | | | Yes | No |  |  | |  | |  | |  |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **RELOCATION EXPENSES ELIGIBILITY -- DATE** Click here to enter a date. | | | | | | | | | | | | | | | | | | | | | |
| Security Deposits Paid: | | | | Yes | No | | if yes, documented? | | | | | Yes | No | | $ Amount: | | | | | | |
| Storage Paid: | | | Yes | No | if yes, documented? | | | | | Yes | | No | $ Amount: | | | | | | #mos | | |
| Moving Costs Paid: | | | Yes | No | if yes, documented? | | | | | Yes | | No | $ Amount: | | | | | | #moves | | |
| Moving Costs include: | | | Vehicle Rental  Gas  Packing/Boxes  Hired Movers  Other | | | | | | | | | | | | | | | | | | |
| If other, list: | | | | | | | | | | | | | | | | | | | | | |
|  |  |  | |  | |  | |  |  | |  | | |  | | | |  | |  | |
| **RECERTIFICATION ELIGIBILITY -- DATE** Click here to enter a date. | | | | | | | | | | | | | | | | | | | | | |
| Recertification questionnaire completed, signed dated by all adults: | | | | | | | | | | | | | | | | | Yes | | | | No |
| Recertification Income: | | | | $ | | | | | | | TENANT RENT: | | | | |  | | | | | |
| Recertification Income calculation OK? | | | | | | | | Yes | No | | UTILITY ALLOWANCE: | | | | |  | | | | | |
| Income Limit: (AMI) | | | | $ | | | | | | | SUBSIDY AMOUNT: | | | | |  | | | | | |
| Source doc recert every year of assistance term? | | | | | | | | Yes | No | | GROSS RENT: | | | | |  | | | | | |
| **NOTES/CONCERNS:** | | | | | | | | | | | FMR: | | | | |  | | | | | |
| % AMI RENT LIMIT: | | | | |  | | | | | |