

<b>Guide for Review of HBCU Grant Agreement Compliance</b>			
<b>Name of Program Participant:</b>			
<b>Staff Consulted:</b>			
<b>Date of Grant Agreement:</b>			
<b>Name(s) of Reviewer(s)</b>		<b>Date</b>	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

**Instructions:** This Exhibit is designed to evaluate the HBCU's compliance with certain key provisions of the executed Grant Agreement under review. The Exhibit is divided into eight sections: Budget; Debarred Contractors; Environmental Review Responsibilities; Indirect Costs; Key Personnel; Consultant Payments; Progress; and Audit Requirements and Reports. (Note that other key elements of the Grant Agreement are covered under separate Exhibits in this Chapter.) Follow the sampling guidance in Section 15-4 of the introduction to this Chapter in selecting activities and transactions to review in completing Exhibit questions.

**Questions:**

**A. BUDGET**

1.

Does a review of costs charged to the HBCU grant agree with the approved budget for the Agreement? [HBCU Grant Agreement, Section 11, Budget]	<input type="checkbox"/> <input type="checkbox"/> Yes      No
<b>Describe Basis for Conclusion:</b>	

2.

<p>If your review indicates any budget differences, are such variances within 10% of the total grant among approved line items (for which HUD approval is not required) or has the HBCU requested, and received written approval, from the HUD grant officer? [HBCU Grant Agreement, Section 11, Budget; 24 CFR 84.25]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

**B. DEBARRED CONTRACTORS**

3.

<p>Does the HBCU ensure that it is not awarding contracts to any party excluded, disqualified, or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal procurement and nonprocurement programs? [HBCU Grant Agreement; 24 CFR Part 24, Subparts C and J; Executive Order 13224, implemented at 31 CFR Parts 595 - 597]</p>	<input type="checkbox"/> <input type="checkbox"/> <b>Yes    No</b>
<p><b>Describe Basis for Conclusion:</b></p>	

**C. ENVIRONMENTAL REVIEW RESPONSIBILITIES**

4

<p>Did the HBCU receive a release of funds from HUD prior to committing funds for the Agreement under review? [HBCU Grant Agreement, Section 7]</p>	<input type="checkbox"/> <input type="checkbox"/> <b>Yes    No</b>
<p><b>Describe Basis for Conclusion:</b></p>	

D. INDIRECT COSTS

5.

If indirect costs are charged to the HBCU grant, are they based on the provisional rate specified on the HUD-1044? [HBCU Grant Agreement, Section 12, Indirect Costs; NOFA, Section IV.B(c), Indirect Costs]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

E. KEY PERSONNEL

6.

a. Who is listed on the HUD-1044 as “key personnel?”
<b>Describe Basis for Conclusion:</b>

b. Is there evidence that the key personnel listed in “a” above are currently directly involved in the administration of the HBCU grant? [HBCU Grant Agreement, Section 8, Key Personnel]	<input type="checkbox"/> <input type="checkbox"/> Yes No
<b>Describe Basis for Conclusion:</b>	

<p>c. If there is evidence that the key personnel are not currently directly involved in the HBCU grant administration, did the HBCU request and receive written approval from the HUD grant officer for changes? [HBCU Grant Agreement, Section 8, Key Personnel]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

F. CONSULTANT PAYMENTS

7.

<p>a. For the Agreement under review, has the HBCU hired consultants?</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. If the HBCU has hired consultants for the agreement reviewed, are the consultants who have an “employer/employee relationship” with the HBCU not paid more than the hourly rate for Schedule IV of the Executive Schedule for Federal Employees? [24 CFR 570.200(d)(1)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

G. PROGRESS

8.

Is the HBCU's rate of progress consistent with its schedule and the grant period for the Agreement under review? [HBCU Grant Agreement, Section 4, Period of Performance, and Section 6, Task 3, Reporting Requirements]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

H. AUDITS AND REPORTS

9.

Are audit reports submitted timely (either 30 days after the HBCU's receipt of the audit report or 9 months after the end of the HBCU's fiscal year, whichever is sooner)? [HBCU Grant Agreement, Section 20, Audit Requirements; OMB Circular A-133, §____.320]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

10.

For the Agreement period being reviewed, are the quarterly reports submitted timely (30 days after the end of each calendar quarter)? [HBCU Grant Agreement, Section 6, Task 3, Reporting Requirements]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

11.

<b>[OS]</b> Does a site review of the HBCU records site support the information in the quarterly reports and agree with the LOCCS balances for the period under review? [24 CFR 84.51]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		