

<b>Guide for Review of HBCU Subrecipient Management</b>			
<b>Name of Program Participant:</b>			
<b>Staff Consulted:</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 management of its subrecipients for compliance with the requirements of 24 CFR Part 84 that pertain to subrecipients, OMB Circular A-21, and the HBCU Grant Agreement under review.

**Questions:**

1.

What procedures does the HBCU have in place for managing its subrecipients, and assuring that subrecipients understand applicable CDBG program requirements? (If procedures are written, attach a copy, if appropriate.) [HBCU Grant Agreement, Section 17; 24 CFR 570.503]
<b>Describe Basis for Conclusion:</b>           

2

<p>If the HBCU disbursed funds to subrecipients, did the HBCU execute written agreements with the subrecipients that contained:</p> <ul style="list-style-type: none"> <li>a) A Statement of Work?</li> <li>b) Records to be maintained?</li> <li>c) Program income requirements?</li> <li>d) Uniform administrative requirements?</li> <li>e) Requirements for faith-based organizations?</li> <li>f) Other applicable requirements (such as environmental review responsibilities)?</li> <li>g) Suspension and termination?</li> <li>h) Reversion of assets?</li> </ul> <p>[HBCU Grant Agreement; 24 CFR 570.503]</p>	<table border="0"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

3.

<p>Have resource materials (e.g. regulations, OMB Circulars, Guide to Eligible Activities) been provided to subrecipients?</p>	<table border="0"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No
<input type="checkbox"/>	<input type="checkbox"/>				
Yes	No				
<p><b>Describe Basis for Conclusion:</b></p>					

4.

How does the HBCU ensure that subrecipients maintain the records necessary to demonstrate compliance with program requirements, including record retention?

[HBCU Grant Agreement, Section 32; 24 CFR 84.53]

**Describe Basis for Conclusion:**

5.

How does the HBCU assure that subrecipient financial management systems are kept in accordance with 24 CFR 84.21 and 24 CFR 84.47?

[24 CFR 570.501(b); 24 CFR 570.502(b)]

**Describe Basis for Conclusion:**

6.

How does the HBCU assure subrecipients comply with procurement and/or subcontracting requirements?

[24 CFR 84.44]

**Describe Basis for Conclusion:**

7.

Does the HBCU review subrecipients for evidence of conflicts of interest <u>either</u> between the HBCU and its subrecipients <u>or</u> between subrecipients and their contractors? [HBCU Grant Agreement, Section 17, Flow Down Provisions]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

8.

Does the HBCU ensure that subrecipients have procedures to: (a) adequately identify HBCU-funded property and assets, and (b) ensure adequate safeguards for preventing loss, damage, or theft of subrecipient-held property? [24 CFR 570.502(b); 24 CFR 570.506; 24 CFR 84.5]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

9.

Does the HBCU routinely require its subrecipients to submit reports, such as progress or financial reports, in order to fulfill HUD performance reporting requirements? [24 CFR 570.506]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		

10.

Does the HBCU monitor its subrecipients on-site?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>	

11.

Describe the system or systems used by the HBCU to keep track of subrecipient-generated program income and ensure accurate reporting. [24 CFR 84.21]	
<b>Describe Basis for Conclusion:</b>	

12.

Does the HBCU check to determine if its subrecipients have established revenue accounts to record program income? [24 CFR 84.21]	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>	

13.

If program income is retained by subrecipients, does the HBCU check to determine that program income is being used before HBCU funds are requested and if such income is being used in accordance with program rules? [HBCU Grant Agreement, Section 29; 24 CFR 84.1, 24 CFR 84.24]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	