

Guide for Review of CDBG Float-Funded Activities			
Name of Program Participant:			
Staff Consulted:			
Name of Activity:			
Name(s) of Reviewer(s)		Date	

**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:** Use this Exhibit to monitor a program participant's compliance with applicable requirements for an activity financed with "float" funds. A "float-funded activity" is an activity financed with undisbursed funds in a program participant's CDBG line of credit and program account that have been budgeted in an Action Plan for another activity that does not need the funds immediately. The float-funded activity is expected to generate program income sufficient to equal the amount of the "float" and must meet the same requirements that apply to CDBG-assisted activities. [See 24 CFR 91.220(g)(1)(ii)(D) and 24 CFR 570.301(b).]

**Questions:**

1.

For the above-named activity, provide the following information: a) the date the float loan was made; b) the amount of the loan; and c) the date of repayment.
<b>Describe Basis for Conclusion:</b>

Exhibit 3-14  
CDBG Entitlement Program

2.

<p>a. Was the activity individually listed and described as a “float-funded activity” in the program participant’s Action Plan or an amendment? [24 CFR 91.220(g)(1)(ii)(D) and 24 CFR 570.301(b)(1)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. Did the program participant include the full amount of the income projected to be generated by the float-funded activity as a source of program income in the same Action Plan in which the float-funded activity was shown, including the month(s) and year(s) the program income is expected to be produced? [24 CFR 91.220(g)(1)(ii)(D) and 24 CFR 570.301(b)(3)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

3.

<p>a. Did the program participant identify in its Action Plan one of the four regulatory options it would take if the float-funded activity failed to generate the projected amount of program income on schedule? [24 CFR 570.301(b)(4)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> Yes No</p>
<p><b>Describe Basis for Conclusion:</b></p>	

b. If the answer to “a” above is “yes,” which option was declared?
<b>Describe Basis for Conclusion:</b>

4.

Was the program income expected to be received, or actually received, in 2.5 years or less from date of obligation of the float-funded activity? [24 CFR 570.301(b)(2)(i)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

5.

a. Is the activity generating, or did the activity generate, program income within the expected time frame?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

b. If the answer to “a” above is “no,” was an extension of the repayment period requested? [24 CFR 570.301(b)(2)(ii)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<b>Describe Basis for Conclusion:</b>			

<p>c. If an extension of the repayment period was requested, did the program participant follow the required steps for a new float-funded activity? [24 CFR 570.301(b)(2)(ii)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>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>							

6.

<p>If the program income was not generated in a timely manner and the repayment period was not extended, did the program participant follow the option declared in its Action Plan to cover such an eventuality? [24 CFR 570.301(b)(4)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>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>							

7.

<p>For any program year in which the program participant expects to receive program income generated from a float-funded activity, did the Action Plan(s) explain that the planned use of this income was previously spelled out in an Action Plan or Plans, and identify the Plan(s) where the planned use was so described? [24 CFR 570.301(b)(5)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>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>					

