**Community Development Block Grant – Mitigation (CDBG-MIT)**

**Certification for Public Law 116-20 Addendum C**

This Addendum should be used when a 2018 CDBG-MIT Grantee is relying on its P.L. 116-20 and 115-254 CDBG-DR Financial Management and Grant Compliance Certification Checklist, and performing updates as required by a *Federal Register* notice to meet the enhanced requirements for CDBG-MIT.

**Instructions to Grantees**

The term “Grantee” refers to a state or unit of general local government that received a direct allocation from HUD of Community Development Block Grant Mitigation (CDBG-MIT) Funds appropriated by Public Law 116-20 (approved June 6, 2019).

The Appropriations Act requires that the Secretary certify, **in advance of signing a CDBG-MIT grant agreement**, that the following requirements are met:

* That the Grantee has in place proficient financial controls;
* That the Grantee has in place proficient procurement processes;
* That the Grantee has established adequate procedures to prevent any duplication of benefits as defined by section 312 (42 U.S.C. 5155) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.) (Stafford Act);
* That the Grantee has established adequate procedures to ensure timely expenditure of funds;
* That the Grantee has established adequate procedures to maintain comprehensive websites regarding all activities assisted with the CDBG-MIT funds; and
* That the Grantee has established adequate procedures to detect and prevent fraud, waste, and abuse of funds.

**CDBG-MIT Compliance Certification**

A grantee that received a certification of its financial controls and procurement processes pursuant to a 2018 CDBG-DR award or through its CDBG-MIT award under P.L. 115-123, may request that HUD rely on its previous certification and supporting documentation. Those grantees are required to provide updates to reflect material changes in those submissions.

NOTE: Existing CDBG-MIT Grantees (Grantees with approved grant agreements governing CDBG-MIT funds provided under P.L. 115-123) should not complete this addendum, but instead must complete Addendum A to rely on a prior CDBG-MIT Financial Management and Grant Compliance Certification Checklist.  Grantees making this request can find the Addendum A [here](https://www.hudexchange.info/resource/5980/pl-116-20-and-1152-54-cdbg-dr-financial-management-and-grant-compliance-certification-checklist/)and should follow the instructions regarding updates to the certification.

2018 CDBG-DR Grantees receiving CDBG-MIT for the First Time

To rely on a "Financial Management and Grant Compliance Certification Checklist" previously submitted for its corresponding 2018 CDBG-DR grant, fill out Part A and Part B of this Addendum.

If a grantee needs to update any other supporting documents from its Prior Certification submissions, it must fill out the appropriate section of the “P.L. 116-20 and 115-254 CDBG-DR Financial Management and Grant Compliance Certification Checklist” and submit it along with this Addendum.

**NOTE: Since this document requires grantees to choose from a drop-down menu, this form can only be filled out electronically. Please ensure that this form is filled electronically and then submitted to HUD.**

Grantees must submit this document and all required information to the Grantee’s designated HUD representative. The designated HUD representative from Headquarters or the Field Office (FO) will review the Grantee’s submission to determine whether it was satisfactorily completed by the Grantee, and complete the HUD sections including the “HUD only” portion, and sign the Compliance Certification. When a FO HUD representative is not available, the CPD FO Director will designate an alternate HUD representative for the FO representative. When a Headquarters HUD representative is not available, the Director of the Disaster Recovery and Special Issues Division will designate an alternate HUD representative for the Headquarters representative.

Questions on this checklist may be submitted to DRSIPolicyUnit@hud.gov. In the alternative, Grantees may call (202) 708-3587.

**Grant agreements will not be executed until HUD has approved the Grantee’s certifications and the Secretary has signed the corresponding *Certification of Proficient Financial Controls, Processes, and Procedures for Community Development Block Grant Disaster Recovery Funding* required by P.L. 116-20.**

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| **Public Law 116-20: Financial Management and Grant Compliance Certification Checklist for CDBG-MIT Grantees** |
| **Grantee** |
| Name of Grantee: |
| Staff Consulted: |
| Name and Title of Grantee Staff Completing Form: |
| Signature: |
| Click or tap to enter a date. |

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| **HUD** |
| HUD Financial Analyst Consulted: |
| Name and Title of HUD Staff Completing Form: |
| Signature: |
| Click or tap to enter a date. |

# **PART A. Prior Certification**

Is the Grantee a 2018 CDBG-MIT Grantee relying on its previous CDBG-DR certification submission (P.L. 116-20 and 115-254 CDBG-DR Financial Management and Grant Compliance Certification Checklist)?

|  |  |
| --- | --- |
| Grantee | HUD – confirm the grantee’s answer |
| Choose an item. | Choose an item. |

NOTE: Grantees must continue to Part B of this addendum to address the enhanced requirements for CDBG-MIT.

# **PART B. Provided by Grantee**

A CDBG-MIT Grantee relying on a P.L. 116-20 and 115-254 CDBG-DR Financial Management and Grant Compliance Certification Checklist for a 2018 disaster must fill out the sections below to address the enhanced requirements for CDBG-MIT, including submitting any additional supporting documentation.

**PART B.1 Procedures to Determine Timely Expenditures**

|  |  |  |
| --- | --- | --- |
|  | Grantee | HUD |
| 1. Do the procedures indicate how the Grantee will project expenditures to expend 50 percent and 100 percent of its allocation of CDBG-MIT funds on eligible activities within the period of performance (i.e., expend 50 percent of its CDBG–MIT grant on eligible activities within six years of HUD’s execution of the grant agreement and 100 percent of its grant within twelve years of HUD’s execution of the agreement)? | Choose an item. | Choose an item. |
| HUD ONLY: Has the Grantee met the requirements of questions 1.? |  | Choose an item. |

Grantee must attach documentation supporting the requirement and provide appropriate cross references and page numbers:

|  |  |  |
| --- | --- | --- |
| Reference File Name/Identifier | Title of Document | Page Number (s) |
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HUD Staff: Indicate the basis for your response:

## **PART B.2 Procedures to Maintain a Comprehensive Website**

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| --- | --- | --- |
|  | Grantee | HUD |
| 1. Do the procedures indicate that the Grantee will have a separate page dedicated to its CDBG-MIT funds that will contain links to all the information required by the notice? 2. Action Plans, Action Plan Amendments, the current approved DRGR Action Plan, and activity/program information for activities described in the action plan; 3. Procurement policies and procedures, a description of services and goods currently being procured by the Grantee, a copy of contracts the Grantee has procured directly; 4. A summary of all procured contracts, including those procured by the grantee, recipients, or subrecipients (e.g., a summary list of procurements, the phase of the procurement, requirements for proposals, and any liquidation of damages associated with a contractor’s failure or inability to implement the contract, etc.) 5. Performance reports (i.e., Quarterly Performance Reports (QPRs)); 6. Citizen participation requirements; and 7. Any other information necessary to account for the use of the funds. | Choose an item. | Choose an item. |
| 1. Please provide a link to the Grantee’s CDBG-MIT Website, if available. | Choose an item. | Choose an item. |
| HUD ONLY: Has the Grantee met the requirements of questions 1. and 2.? |  | Choose an item. |

Grantee must attach documentation supporting the requirement and provide appropriate cross references and page numbers:

|  |  |  |
| --- | --- | --- |
| Reference File Name/Identifier | Title of Document | Page Number (s) |
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HUD Staff: Indicate the basis for your response:

## **PART B.3 Procedures to Detect Fraud, Waste, and Abuse of Funds**

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| --- | --- | --- |
|  | Grantee | HUD |
| 1. Does the grantee’s policies and procedures have criteria that can be used to evaluate the capacity of potential subrecipients? | Choose an item. | Choose an item. |
| 1. Has the Grantee provided a monitoring policy that indicates how it will enhance its monitoring of subrecipients, contractors and other program participants? | Choose an item. | Choose an item. |
| 1. Does the grantee have a conflict of interest policy and the process for promptly identifying and addressing such conflicts? | Choose an item. | Choose an item. |
| 1. Has the grantee enhanced the internal auditor function established for the grantee’s CDBG-DR grant?   **NOTE:** The internal audit function must provide both programmatic and financial oversight of grantee activities and the submission must include a document signed by the internal auditor that describes his or her role in detecting fraud, waste, and abuse.  Additionally, grantees may, as a special grant condition, be required to submit internal audit reports directly to HUD. | Choose an item. | Choose an item. |
| HUD ONLY: Has the Grantee met the requirements of questions 1., 2., 3., and 4.? |  | Choose an item. |

Grantee must attach documentation supporting the requirement and provide appropriate cross references and page numbers:

|  |  |  |
| --- | --- | --- |
| Reference File Name/Identifier | Title of Document | Page Number (s) |
|  |  |  |
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HUD Staff: Indicate the basis for your response:

# **PART C. Certifications**

As required by the *Federal Register* notices, the Grantee must make the certification below by signing where indicated.

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| --- |
| **Compliance Certification** |
| The Grantee certifies that: it has reviewed the requirements of Public Law 116-20 and the *Federal Register* notices allocating CDBG-MIT funds; that its responses to this addendum and submitted supporting documentation are accurate; that it will adhere to the controls, standards, processes, corrective actions, and procedures it described in the prior certification checklist and supporting documentation, as well as any updated procedures provided herein, for the life of the grant, unless amended with HUD’s approval; and that it has in place proficient financial controls and procurement processes and that it has established adequate procedures to prevent any duplication of benefits as defined by section 312 of the Stafford Act, to ensure timely expenditure of funds, to maintain comprehensive websites regarding all disaster recovery activities assisted with these funds, and to detect and prevent waste, fraud, and abuse of funds.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Signature of Certifying Official    \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  (Printed Name of Certifying Official) (Date) |

# **PART D. HUD** **Review**

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| Based on your review of the responses to this Addendum, as well as previous submissions provided by the grantee for the Prior Certification, do you recommend that the Secretary make the certification required by Public Law 116-20? | Choose an item. |
| Provide any relevant comments, if necessary, to explain deficiencies or a “no” response: |  |