

# CDBG-DR State Grantee Financial Management and Grant Compliance Certification Requirements Subject to the Universal Notice

## Checklist for New Financial Certification

---

HUD's Office of Disaster Recovery *State* Grantee Resource

Version: 3.0

Published: July 2025



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of Disaster Recovery

## Change Log

Version (Date)	Summary of Changes Made
Version 1 (January 2025)	N/A
Version 2 (April 2025)	Corrected minor typos
Version 3 (July 2025)	Split new certification and relying on prior certification items into two separate checklists; revised instructions for added clarity; corrected minor typos.

**i. Table of Contents**

<b>i. Table of Contents</b>	<b>2</b>
<b>ii. Instructions</b>	<b>3</b>
a. Purpose	3
b. Overview of Requirements for Certification	3
c. How to Use This Checklist	4
<b>I. CERTIFICATION and CAPACITY ASSESMENT</b>	<b>5</b>
A. General Information and Enclosures	5
B. Required Documentation	5
C. Optional Documentation	6
D. Certification Questions and Affirmations	6
a. Financial Management Controls	6
b. Procurement Processes	7
c. Procedures to Maintain a Comprehensive Website	8
d. Procedures to Detect Fraud, Waste, and Abuse of Funds	9
e. Procedures for Prevention of Duplication of Benefits	10
f. Procedures to Determine Timely Expenditures	11
g. Capacity Assessment and Staffing Analysis	12
E. Compliance Certification and Signature	14

## ii. Instructions

### a. Purpose

**State grantees should use this checklist for *new financial certification*. Do not use this checklist when relying on a prior financial certification submission – instead, refer to the checklist for relying on prior financial certification submissions.**

*State* grantees should use this certification checklist to submit documentation and certifications required for Financial Management and Grant Compliance Certification. This certification checklist includes all required elements for state grantees to complete a *new certification* (see ii.c. *How to Use This Checklist*).

### b. Overview of Requirements for Certification

The Universal Notice describes the grant award process for CDBG-DR grantees, including certification of financial controls and procurement processes and adequate procedures for proper grant management (see Section II.A of the Universal Notice for certification requirements). All CDBG-DR grantees that are not eligible to rely on prior certifications must complete the Financial Management and Grant Compliance Certification Requirements and submit the certification checklist to enable certification by the Secretary.

Section II.A.1 of the Universal Notice describes the documentation requirements for certification, including Parts a-g below.

Parts a-g (Section I.D.a-g of this checklist)

If required by an appropriations act, grant agreements will not be executed until the Secretary has issued a certification for the grantee to certify that the grantee has:

- a) Proficient financial management controls in place;
- b) Proficient procurement processes in place;
- c) Adequate procedures to maintain comprehensive websites regarding all disaster recovery activities assisted with the CDBG-DR funds;
- d) Adequate procedures to detect and prevent fraud, waste, and abuse of funds;
- e) 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); and
- f) Adequate procedures to ensure timely expenditure of funds.
- g) Capacity to carry out the recovery and address any capacity gaps

**c. How to Use This Checklist**

Refer to the table below for detailed instructions on how to use this checklist:

Certification Process per Universal Notice requirements	Grantee Eligibility	How to Use this Checklist
<b>Certification</b>	Grantee has received a CDBG-DR allocation subject to the requirements the Universal Notice	Complete <b><u>all</u></b> sections of this checklist within 135 days of the applicability date of the Allocation Announcement Notice: <ul style="list-style-type: none"> <li>• I.A.</li> <li>• I.B.</li> <li>• I.C.</li> <li>• I.D.a.-g.</li> <li>• I.E.</li> </ul>

## I. CERTIFICATION and CAPACITY ASSESSMENT

### A. General Information and Enclosures

<b>Certification Checklist for State CDBG-DR Grantees</b>
Name of Grantee:
Date of Submission:

### B. Required Documentation

Attach the following documents. Please select the corresponding box to signify that the documentation has been attached (or received separately).

Part a-g*	Required Documentation	Attached
a (II.A.1.a)	The most recent single audit.	<input type="checkbox"/>
	The most recent annual comprehensive financial report (ACFR).	<input type="checkbox"/>
b (II.A.1.b)	Procurement policies and procedures relevant to the CDBG-DR grant.	<input type="checkbox"/>
c (II.A.1.c)	Policies and procedures to maintain a comprehensive website.	<input type="checkbox"/>
d (II.A.1.d)	Policies and procedures to detect and prevent fraud, waste, and abuse.	<input type="checkbox"/>
e (II.A.1.e)	Policies and procedures that prevent duplication of benefits.	<input type="checkbox"/>
f (II.A.1.f)	Policies and procedures to ensure timely expenditures.	<input type="checkbox"/>
	Policies and procedures governing the use of program income.	<input type="checkbox"/>
g (II.A.1.g)	Capacity Assessment and Staffing Analysis	<input type="checkbox"/>

\*Citations referenced in the "Requirement" column are from the Universal Notice.

In the table below, please list the file names/identifiers, title of the documents, and page numbers, if applicable, for all attachments. Additional attachments can be listed in the tables at the end of the checklist.

Reference File Name/Identifier	Title of Document	Relevant Page Number (s)	Related Certification Question


### C. Optional Documentation

Grantees can choose to provide additional documentation to support their certification. If providing additional documentation, grantees should list the file names/identifiers, title of the documents, page numbers, and related certification question the documentation is addressing in the table below. Additional attachments can be listed in the tables at the end of the checklist.

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

### D. Certification Questions and Affirmations

**Important Note:** For a-g below, if the grantee believes it complies with the requirement, the grantee should check the affirmation (e.g., the grantee “affirms” statement) under each question. The grantee must attach the required documentation, including the appropriate cross references in each Part of the Certification Checklist to demonstrate how the grantee will comply with the requirements. Most statements include citations in brackets, which have been provided for convenience to identify sources that served as the basis for the certification. The statements in this document reflect existing requirements and should not be read to impose additional requirements. Upon completion, a grantee must submit this checklist and the requested documentation to the grantee’s designated HUD representative.

*Grant Managers/CPD Representatives and Financial Analysts can assist the grantee in completing the Certification Checklist. Grantees may contact their assigned Grant Manager/CPD Representative for questions on this checklist.*

#### a. Financial Management Controls

The grantee must have proficient financial controls. For purposes of the Secretary’s certification, a grantee has in place proficient financial controls if the following statements are true:

1) The most recent single audit does not indicate weaknesses, deficiencies, or concerns related to Financial Management of CDBG, CDBG-DR, or CDBG-MIT funds? [Section II.A.1.a.(i)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
2) The most recent Annual Comprehensive Financial Report (ACFR) does not indicate weaknesses, deficiencies, or concerns? [Section II.A.1.a.(i)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
3) If the single audit indicates deficiencies related to CPD programs, the grantee has documentation showing how those weaknesses have been or are being addressed? [Section II.A.1.a.(i)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4) If the ACFR does indicate deficiencies, the grantee has documentation showing how those weaknesses have been or are being addressed? [Section II.A.1.a.(i)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

5) Has the grantee completed and submitted the certification documentation required in the applicable Certification Checklist? [Section II.A.1.a.(ii)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>The grantee should select one of the statements below.</b></p> <ul style="list-style-type: none"> <li>Grantee affirms that it does not have weaknesses, deficiencies, or concerns in the single audit or ACFR. <input type="checkbox"/></li> </ul> <p style="margin-left: 20px;"><b>OR</b></p> <ul style="list-style-type: none"> <li>If the grantee indicated weaknesses, deficiencies, or concerns related to CPD programs, the grantee has included documentation to address the weakness, deficiencies, or concerns. <input type="checkbox"/></li> </ul>	

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

## b. Procurement Processes

The grantee must have in place proficient procurement processes based on full and open competition. For purposes of the Secretary's certification, a grantee has in place proficient procurement processes if:

<p>1) At least one of the following statements is true:</p> <ul style="list-style-type: none"> <li>a. The grantee has adopted the specific procurement standards at 2 CFR 200.318 through 2 CFR 200.327 for both its own procurement processes and for its subrecipients [Section II.A.1.b.(i)(1)]; <i>or</i></li> <li>b. The grantee will follow its own state procurement policies and procedures based on full and open competition and establish requirements for procurement processes for local governments and subrecipients based on full and open competition pursuant to 24 CFR 570.489(g), and the requirements for the state, its local governments, and subrecipients to evaluate the cost or price of the product or service comply with 2 CFR 570.489(l) [Section II.A.1.b.(i)(2)]; <i>or</i></li> <li>c. The grantee has adopted 2 CFR 200.317, meaning it will follow its own state procurement processes based on full and open competition, evaluate the cost or price of the product or service, and comply with 2 CFR 570.489(l), but impose 2 CFR 200.318 through 200.327 on its subrecipients [Section II.A.1.b.(i)(3)].</li> </ul> <p><b>Note:</b> State grantees must select one (1) of the three procurement options above and attach the corresponding documents as directed in the Required Documentation section.</p>
<p>2) If applicable, the grantee's procedures specify whether other state agencies to whom the administering agency chooses to provide funding must follow either: i) the procurement processes that the administering agency is subject to; <i>or</i> ii) the same processes to which other local governments and subrecipients are subject; <i>or</i> iii) the procurement processes that the agency carrying out the activities follows [Section II.A.1.b.(i)(3)].</p>



3) The grantee's policies and procedures describe how the grantee will comply with applicable alternative procurement requirements for all procurement actions, as described in the Universal Notice. [Section III.B.7.a.]
4) If applicable, the grantee's policies and procedures describe how the grantee will comply with procurement requirements for projects using CDBG-DR funds as non-Federal match [Section III.B.7.b]
<b>Grantee affirms it meets this requirement:</b> <input type="checkbox"/>

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

### c. Procedures to Maintain a Comprehensive Website

A grantee must have adequate policies and procedures to maintain a comprehensive accessible website. For purposes of the Secretary's certification, a grantee has adequate procedures to maintain a comprehensive website if the following statements are true:

<p>1) The policies and procedures indicate to HUD that the grantee will have a separate webpage dedicated to its disaster recovery activities assisted with CDBG-DR funds.</p> <p>Note: The grantee's policies and procedures must indicate that the required items will be on its website. The required items in Section III.B.8 of the Universal Notice are:</p> <ul style="list-style-type: none"> <li>• Adim Action Plan (if applicable)</li> <li>• Action Plan (including all amendments);</li> <li>• Each performance report (as created using the DRGR system);</li> <li>• Citizen participation plan;</li> <li>• Projection of expenditures and outcomes;</li> <li>• Procurement policies and procedures;</li> <li>• Program-specific policies and procedures;</li> <li>• All contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and</li> <li>• A summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.).</li> </ul> <p>Note, contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website. [Section III.B.8.]</p>
2) For items required in Section III.B.8 of the Universal Notice to be available to the public on its website, the grantee will make these documents available in a form accessible to persons with disabilities? [Section III.B.8.a.]

- 3) The grantee's procedures indicate the frequency of website updates, which at a minimum must be quarterly. [Section II.A.1.c]

**Grantee affirms it meets this requirement:** ☐

Please provide a link to the grantee's CDBG-DR Website, if available.

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

#### **d. Procedures to Detect Fraud, Waste, and Abuse of Funds**

The grantee must have adequate procedures to detect fraud, waste, and abuse of funds. For purposes of the Secretary's certification, a grantee has adequate procedures to detect fraud, waste, and abuse of funds if the following statements are true:

- 1) The grantee has policies and procedures to detect fraud, waste, and abuse. The grantee's procedures are adequate if the procedures indicate:
  - a. how the grantee will verify the accuracy of information provided by applicants [Section II.A.1.d.(i)];
  - b. the criteria to be used to evaluate the capacity of potential subrecipients [Section II.A.1.d.(ii)]; and
  - c. the frequency with which the grantee will monitor other agencies that will administer CDBG-DR funds, how it will monitor subrecipients, contractors, and other program participants, and why monitoring is to be conducted and which items are to be monitored [Section II.A.1.d.(iii)].
- 2) If the grantee has a grant of \$100 million or more, the grantee has or will employ an internal auditor that provides both programmatic and financial oversight of grantee activities, and has adopted policies that describes the auditor's role in detecting and preventing fraud, waste, and abuse. [Section II.A.1.d.(iv)]
- 3) The grantee has a written standard of conduct and conflicts of interest policy that complies with the requirements of 24 CFR 570.489(g), (h), and (l) and subparagraph II.A.1.b.(i) *Procedures for procurement* of the Universal Notice, which policy includes the process for promptly identifying and addressing such conflicts. [Section II.A.1.d.(v)(2)]
- 4) How the grantee will assist in investigating and taking action when fraud occurs within the grantee's CDBG-DR activities and/or programs. [Section II.A.1.d.(vi)]
- 5) If the grantee is receiving CDBG-DR funds for the first time, it has indicated that grantee-staff and subrecipients will attend fraud related training provided by HUD OIG, when offered, to assist in the proper management of CDBG-DR grant funds? [Section II.A.1.d.(vi)]
- 6) The grantee indicates that instances of fraud, waste, and abuse will be referred to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: [hotline@hudoig.gov](mailto:hotline@hudoig.gov)). [Section II.A.1.d.(vi)]
- 7) The grantees' policies and procedures include:

- a. How the grantee will provide CDBG-DR beneficiaries with information that raises awareness of possible fraudulent activity, how the fraud can be avoided, and what local or state agencies to contact to take action and protect the grantee and beneficiary investment;
- b. How the grantee will make CDBG-DR beneficiaries aware of the risks of contractor fraud and other potentially fraudulent activity that can occur in communities recovering from a disaster; and
- c. The steps the grantee will take to assist a CDBG-DR beneficiary if the beneficiary experiences contractor or other fraud. The procedures must also address what steps the grantee will follow to provide additional assistance in cases where the beneficiary is eligible for additional CDBG-DR assistance because the fraudulent activity results in the creation of additional unmet need. [Section II.A.1.d.(vi)(1)-(3)]

**Grantee affirms it meets this requirement:** ☐

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

**e. Procedures for Prevention of Duplication of Benefits**

The grantee must have 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.). For purposes of the Secretary's certification, a grantee has adequate procedures to prevent any duplication of benefits if the following statements are true:

- 1) The grantee's Duplication of Benefits policies and procedures include a uniform process that:
  - determines all disaster assistance received by the grantee or applicant and all reasonably identifiable financial assistance available to the grantee or applicant, as applicable, before committing funds or awarding assistance [Section II.A.1.e.(i); Appendix C]; and
  - determines a grantee or an applicant's unmet need(s) for CDBG-DR assistance before committing funds or awarding assistance [Section II.A.1.e.(ii); Appendix C]; and
  - requires beneficiaries to enter into a signed agreement to repay any duplicative assistance if they later receive additional assistance for the same purpose for which the CDBG-DR award was provided [Section II.A.1.e.(iii); Appendix C]; and
  - verifying that CDBG-DR funds will not be used for activities reimbursable by, or for which funds are made available by, FEMA or the U.S. Army Corps of Engineers (USACE). Although the language may vary among appropriations acts, CDBG-DR funds may not be used for activities reimbursable by, or for which funds are made available by FEMA or the USACE [Section II.A.1.e.(iv); Appendix C].

2) The grantee's Duplication of Benefits policies and procedures identifies a method to monitor compliance with the agreement for a reasonable period (i.e., a time period commensurate with risk) and articulates this method in its policies and procedures, including the basis for the period during which the grantee will monitor compliance. This agreement must also include the following language: "Warning: Any person who knowingly makes a false claim or statement to HUD or causes another to do so may be subject to civil or criminal penalties under 18 U.S.C. 2, 287, 1001 and 31 U.S.C. 3729." [Section II.A.1.e.(iii); Appendix C]
3) The grantee's Duplication of Benefits policies and procedures identify a process for verifying if FEMA or U.S. Army Corps funds are available for an activity (i.e., the application period is open) or the costs are reimbursable by FEMA or Army Corps (i.e., the grantee will receive FEMA or Army Corps assistance to reimburse the costs of the activity) before awarding CDBG-DR assistance for costs of carrying out the same activity. [Section II.A.1.e.(iv); Appendix C]
4) The grantee's Duplication of Benefits policies and procedures provide that before the award of assistance, the grantee will use the best, most recent available data from FEMA, the Small Business Administration (SBA), insurers, and any other sources of local, state, and Federal sources of funding to prevent the duplication of benefits. [Section II.A.1.e.(iv); Appendix C]
<b>Grantee affirms it meets this requirement:</b> <input type="checkbox"/>

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

#### **f. Procedures to Determine Timely Expenditures**

A grantee must have adequate policies and procedures to determine timely expenditures. For purposes of the Secretary's certification, a grantee has adequate procedures to ensure the timely expenditure of funds if the following statement is true:

1) The grantee's timely expenditure policies and procedures indicate how it will track and document expenditures of the grantee and its subrecipients (both actual and projected reported in the performance report). [Section II.A.1.f.(i)]
2) The grantee's timely expenditure policies and procedures indicate how it will ensure proper reporting, tracking, and expenditure of program income, including how it will ensure that program income is substantially disbursed before making additional withdrawals from the United States Treasury, except when carrying out activities through a revolving fund. [Section II.A.1.f.(ii)]
3) The grantee's timeline expenditure policies and procedures indicate how it will reprogram funds in a timely manner for activities that are stalled (e.g., a project is more than six months behind schedule); and how it will project expenditures of all CDBG-DR funds within the period provided in Section III.F.1. of the Universal Notice and applicable Allocation Announcement Notice. [Section II.A.1.f.(iii)-(iv)]

Grantee affirms it meets this requirement: ☐

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

### g. Capacity Assessment and Staffing Analysis

**Note:** Grantees applying for *certification* must submit the Capacity Assessment with their submission for certification. To rely on prior submissions for Consolidated Notice grants, grantees must complete this section and attach all required documentation for HUD review and records.

The grantee must submit a capacity assessment and staffing analysis to HUD. The capacity assessment must describe the grantee's capacity to carry out the recovery and how it will address any capacity gaps. HUD will determine that the grantee has sufficient management capacity to adequately reduce risk if the grantee submits a capacity assessment and staffing analysis if the following statements are true:

1) The <i>capacity assessment</i> identifies the lead agency responsible for implementation of the CDBG-DR award and indicates that the lead agency will report directly to the chief executive officer of the jurisdiction. [Section II.A.1.g.(i).(1)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
2) The <i>capacity assessment</i> documents that the grantee conducted an assessment of its capacity to carry out CDBG-DR recovery efforts. [Section II.A.1.g.(i).(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
3) The <i>capacity assessment</i> includes a timeline with milestones that describe when and how the grantee will address all capacity gaps that are identified. [Section II.A.1.g.(i).(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4) The <i>capacity assessment</i> includes a list of any open monitoring and HUD OIG audit findings related to any CPD Program and an update on the corrective actions undertaken to address each finding. [Section II.A.1.g.(i).(4)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5) The <i>staffing analysis</i> includes an organizational chart that indicates which personnel or organizational unit will be responsible for each of the Financial Management and Grant Compliance Certification Requirements identified in section II.A.1.a through f. [Section II.A.1.g.(ii).(1)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
6) The <i>staffing analysis</i> includes documentation demonstrating that it has assessed staff capacity and identified positions for the purpose of: case management, program manager for each recovery area (housing, infrastructure, economic revitalization), and staff responsible for procurement/contract management, Section 3 of the HCDA, URA and Section 104(d) of the HCDA, CDBG acquisition and relocation and fair housing and environmental compliance [Section II.A.1.g.(ii).(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No
7) The <i>staffing analysis</i> includes a description of how the grantee will provide training and technical assistance for any personnel not employed by the	<input type="checkbox"/> Yes <input type="checkbox"/> No

grantee at the time of Action Plan submission and for any subrecipients, including how the grantee will fill gaps in knowledge or technical expertise required for successful and timely recovery. [Section II.A.1.g.(ii).(3)]	
<p><b>The grantee should select one of the statements below.</b></p> <ul style="list-style-type: none"> <li>• <b>Grantee affirms that meets this requirement</b> <input type="checkbox"/></li> </ul>	

Reference File Name/Identifier	Title of Document	Page Number (s)	Related Certification Question

## E. Compliance Certification and Signature

As required by the Universal Notice and the Allocation Announcement Notice, the grantee must make the certification below by signing where indicated.

### Compliance Certification

The grantee certifies that: it has reviewed the requirements of Public Law(s) \_\_\_\_\_, which appropriates CDBG-DR funds, and the Universal Notice and Allocation Announcement Notice that establish the rules, waivers, and alternative requires and allocate CDBG-DR funds; that its responses to this checklist and submitted supporting documentation are accurate; that it will adhere to the controls, standards, processes, corrective actions, and procedures it described in this checklist and supporting documentation; 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)

## Financial Management and Grant Compliance Certification Requirements for States

Additional attachments can be listed in this table.

[illegible]