

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

Checklist for Relying on a Prior Submission of 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

| | |
|--|----------|
| i. Table of Contents | 2 |
| ii. Instructions | 3 |
| a. Purpose | 3 |
| b. Overview of Requirements for Relying on Prior Financial Certification Submissions | 3 |
| c. How to Use This Checklist | 4 |
| I. RELYING ON PRIOR SUBMISSIONS OF FINANCIAL CERTIFICATIONS | 6 |
| II. Compliance Certification and Signature | 7 |

ii. Instructions

a. Purpose

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

State grantees should use this certification checklist to rely on a prior financial certification submission. This certification checklist includes all required elements for State grantees to *rely on a prior financial certification submission* (see ii.c. *How to Use This Checklist*).

b. Overview of Requirements for Relying on Prior Financial Certification Submissions

The Universal Notice describes the grant award process for CDBG-DR grantees, including the process for relying on a prior certification (see Section II.B of the Universal Notice for requirements to rely on a prior certification). All CDBG-DR grantees must complete the Financial Management and Grant Compliance Certification Requirements and submit the certification checklist to enable certification by the Secretary.

For five years after the execution of a grant agreement for an initial allocation of funds subject to the Consolidated Notice (Public Laws 117-43, 117-180, and 117-328) or Universal Notice, HUD will rely on the grantee's prior submissions provided in response to the Financial Management and Grant Compliance Certification Requirements for any subsequent allocation of funds that is subject to the Universal Notice. HUD will continue to monitor the grantee's submissions and updates made to policies and procedures during the normal course of business (i.e., CPD's Monitoring Handbook and applicable CPD Notice Implementing Risk Analyses for CPD programs). The grantee must notify HUD of any substantial changes made to these submissions.

If it has been more than five years since the executed grant agreement for the original CDBG-DR grant, grantees must update and resubmit the documentation required by section II.A.1. of the Universal Notice (Documentation requirements) with the completed Certification Checklist to enable the Secretary to certify that the grantee has in place proficient financial controls and procurement processes, and adequate procedures for proper grant management. However, the Secretary may require any CDBG-DR grantee to update and resubmit the documentation required by section II.A.1. (Documentation requirements), if there is good cause to require it.

Additionally, to rely on prior submissions for Consolidated Notice grants, grantees must have submitted their Capacity Assessment with their Implementation Plan, as required in section III.A.2. of the Consolidated Notice. If the grantee did not submit that documentation, they should include it now. If grantees already submitted their Capacity Assessment with their Implementation Plan, they must document any substantial changes in the box provided on page 6 of this checklist and submit the revised documentation with this checklist.

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 |
|---|---|--|
| Relying on Prior Submissions of Financial Certifications | <p>Grantee must meet the following criteria to rely on prior certifications:</p> <ol style="list-style-type: none"> 1) Grantee previously received an allocation subject to the requirements of the Consolidated Notice (Public Laws 117-43, 117-180, and 117-328) or the Universal Notice; <i>and</i> 2) Grantee was previously certified by HUD after submitting financial certifications subject to the requirements of the Consolidated Notice or the Universal Notice; <i>and</i> 3) It has not been more than five (5) years since the date that HUD executed (i.e., signed) the initial grant agreement for the allocation for which the grantee submitted the financial certifications to HUD for review | <p>Complete <u><i>all</i></u> sections of this checklist, including the Section I (page 5) and Section II (page 6).</p> <p>Note: Grantees are required to submit revised policies and procedures to HUD following any substantial revisions. This includes updates to the following documentation:</p> <ol style="list-style-type: none"> 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 (for Consolidated Notice grantees, this may have |

Financial Management and Grant Compliance Certification Requirements for States

| | | |
|--|--|--|
| | | been submitted as part of the Implementation Plan) |
|--|--|--|

I. RELYING ON PRIOR SUBMISSIONS OF FINANCIAL CERTIFICATIONS

For grantees that have previously received an allocation subject to the requirements of the Consolidated Notice (Public Laws 117-43, 117-180, and 117-328) or the Universal Notice, HUD will rely on prior submissions of financial certifications for five years after the execution of the initial grant agreement (Section II.B. of the Universal Notice).

For grants subject to the Universal Notice for which the grantee is choosing to rely on a previous CDBG-DR certification submission:

| State CDBG-DR Grantees with Prior Certification Checklist Submissions (Universal Notice Grants Only) |
|---|
| Name of Grantee: |
| Date of Request to Rely on Prior Submissions (i.e., date Section II of this form is submitted): |
| Date of <i>Initial</i> Allocation Announcement Notice Allocating Funds Subject to the Consolidated Notice or Universal Notice: |
| Amount of Initial Allocation of Funds Subject to the Consolidated Notice or Universal Notice: |
| Date HUD Executed Grant Agreement (following prior submission): |
| Is the date HUD Executed the Grant Agreement within 5 years of the date of submission of this checklist? |
| Describe any updates made to the documentation included in the <i>Prior</i> submission (including any updates to a previously submitted implementation plan or capacity assessment) and attach these revised documents, as needed (see list of documents in the How to Use this Checklist instructions above): |

II. 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)