|  |  |  |  |
| --- | --- | --- | --- |
| **Guide for Review of VHRMP Grant Program** | | | |
| **VHRMP Grantee:** | | | |
| **Grant Number:** | | | |
| **Staff Consulted:** | | | |
| **Name(s) of Reviewer(s)** |  | **Date** |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFO, 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 assess the administration of the grantee’s Veterans Housing Rehabilitation and Modification Pilot Program (VHRMP) grant. It is divided into eight sections: Overall Management; Program Progress, Reporting and Oversight; Written Agreements; VHRMP Affordability Requirements; Property Standards; Other Requirements; Recordkeeping; and Financial Management. This Exhibit is to be used for monitoring VHRMP grants awarded in Fiscal Year 2018 and later. Because the VHRMP Notice of Funding Opportunity (NOFO) and grant agreements change from year to year, confirm that you are using the correct NOFO and grant agreement before beginning your review. Exhibit questions that do not reflect that year’s NOFO and grant agreement requirements do not apply and cannot be the basis of a Concern or a Finding.

**Questions:**

A. OVERALL MANAGEMENT

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the duties and responsibilities of VHRMP grantee staff clearly defined and understood by both management and staff? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are lines of authority clearly outlined and understood by both management and staff? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are there systems in place that establish deadlines and track employee performance of specific tasks? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are there systems to ensure that staff receives the appropriate information to enable them to complete tasks timely? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. Program Progress, Reporting and Oversight

5.

|  |  |
| --- | --- |
| The grantee must comply with the monitoring, reporting and recordkeeping requirements at  2 CFR 200.328 through 200.337. | |
| Does the grantee submit reports to HUD in such a manner, schedule and form as required by the VHRMP Grant Agreement, including submitting quarterly performance reports and financial reports in DRGR?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the performance goals and timelines in the grantee’s approved application and the performance reports that the grantee has submitted to HUD, has the grantee been meeting the performance goals and  timelines described in the Recipient’s approved application?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the information in DRGR and other information obtained through HUD’s monitoring of the grant, is the VHRMP grantee carrying out eligible activities in compliance with its Grant Agreement and approved application?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the grantee evaluate each subrecipient's (or affiliate’s) risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring?  [VHRMP Grant Agreement; 2 CFR 200.332(b)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the VHRMP grantee review the performance and financial reports of  its affiliates/subrecipients and monitor the activities of affiliates/subrecipients as necessary to ensure that each subaward is used for authorized purposes, in compliance with Federal statues, regulations, and the terms and conditions of the subaward; and that subaward performance  goals are achieved?  [VHRMP Grant Agreement; 2 CFR 200.332(d)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient determined its affiliate(s)/subrecipient(s) failed to make adequate progress, did the VHRMP grantee take action to correct the lack of progress?  [VHRMP Grant Agreement; 2 CFR 200.332(d)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

C. Written Agreements

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did the VHRMP grantee execute written agreements with VHRMP affiliates before committing or disbursing funds?  [VHRMP Grant Agreement; 2 CFR 200.332(a)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| b. Do the written agreements include all required provisions as specified in 2 CFR 200.332(a)?  [VHRMP Grant Agreement; 2 CFR 200.332(a)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. VHRMP Eligibility Requirements

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure VHRMP housing rehabilitation and modification assistance is provided only to “eligible veterans”?  **Note:** “Eligible veteran” means a veteran as defined by 38 U.S.C. 101 who has a disability as defined by 42 U.S.C. 12102 and whose income does not exceed 80 percent of the median income for the area as determined by HUD.  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure all determinations of veterans’ income are based on ONE of the following?   * 1. Annual income as defined at 24 CFR 5.609; or   2. Adjusted gross income as defined for purposes of reporting under the IRS Form 1040 series for individual Federal annual income tax purposes.   [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure property is rehabilitated or modified with VHRMP funds ONLY IF the property is the “primary residence” of the eligible veteran?  **Note:** “Primary residence” means a single-family house, a duplex, or a unit within a multiple-dwelling structure that is the principal dwelling of an eligible veteran and is owned by:   1. The eligible veteran; 2. The eligible veteran’s spouse, child, grandchild, parent, or sibling; 3. A spouse of the eligible veteran’s child, grandchild, parent, or sibling; or 4. Any individual related by blood or affinity whose close association with the eligible veteran is the equivalent of a family relationship.   [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the VHRMP grantee’s records for each home rehabilitated or modified under VHRMP include a document that is signed by the eligible veteran or a family member of an eligible veteran and certifies that the eligible veteran intends the housing to continue to be the veteran’s Primary Residence for at least five years after the rehabilitation or modification is completed?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

E. PROPERTY Standards

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure that all housing modified or rehabilitated with VHRMP funds meets the grantee’s written housing standards?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the VHRMP grantee’s written housing standards reflect all applicable State or local building codes, ordinances, and requirements or, in the absence of a State or local building code, the International Existing Building Code of the International Code Council?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
|  | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure accessibility features comply with requirements in 24 CFR 8.32, with exceptions to accommodate the specific disability of the eligible veteran?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

F. Other Requirements

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the VHRMP grantee notify HUD of each property proposed for rehabilitation or modification BEFORE approving that proposed property?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the VHRMP grantee supply HUD with all available and relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR Part 50?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the VHRMP grantee carry out mitigating measures or reject the proposed property if and as required by HUD?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the VHRMP grantee refrain from undertaking any project or activity that could limit the choice of reasonable alternatives or produce an adverse environmental impact, including modification or rehabilitation of a property, and refrain from committing or expending HUD or local funds for modification or rehabilitation of a proposed property until HUD completed an environmental review as required under 24 CFR Part 50, and HUD’s Office of Rural Housing and Economic Development provided written notification of HUD’s environmental approval?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the VHRMP grantee developed and implemented procedures and maintained documentation to ensure each modification and rehabilitation of a veteran’s primary residence is completed at no cost to the eligible veteran (including application fees) or at a cost such that the eligible veteran pays no more than 30 percent of the veteran’s income in housing costs during any month?  Note: “Housing costs” means the total of any mortgage loan principal and interest, real estate taxes, and insurance for the residence, plus any loan principal and interest or other costs the eligible veteran must pay for the modification and rehabilitation.  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

G. Recordkeeping

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the VHRMP grantee maintain records to demonstrate compliance with VHRMP requirements?  [VHRMP Grant Agreement; 2 CFR 200.302(a), (b)(3), 200.303(a), 200.403(g)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |
|  | |
|  | |

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are records retained for the applicable time periods specified in 2 CFR part 200?  [VHRMP Grant Agreement; 2 CFR 200.334] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

H. Financial Management

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the program income is generated by the grant-funded activities, does the VHRMP grantee use program income for additional eligible activities in accordance with the Grant Agreement, use DRGR to track the use of program income, and report the receipt and use of program income in the reports the Recipient submits to HUD under the Grant Agreement, and expend program income before drawing down grant funds through DRGR? [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

g. sECTION 3

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the VHRMP grantee maintain records that demonstrate adequate Section 3 compliance?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the VHRMP grantee’s policies give priority consideration for employment, training, contracting, and other economic opportunities in accordance with applicable Section 3 regulations?  [VHRMP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |