

<b>Guide for Review of HOPWA CARES Act Grants Project Sponsor Management and Oversight</b>			
<b>Name of Grantee:</b>			
<b>Staff Consulted:</b>			
<b>Program Year Under Review:</b>			
<b>Name(s) of Reviewer(s)</b>		<b>Date</b>	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFO, 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:** This Exhibit is designed to monitor core HOPWA program requirements for all HOPWA formula (HOPWA-CV) and HOPWA competitive (HOPWA-C-CV) CARES Act grants. This Exhibit is also to be used as explained below to monitor FY2020 grant funds that were used in accordance with the flexibilities HUD provided under Section V of Notice CPD-20-05. Questions that pertain to HUD COVID waivers, which are applied to all HOPWA grants, are in the Due for Review of HOPWA CARES Act Housing Planning and Rent Subsidies and Facility Based Projects Exhibits.

These are the five sections of the HOPWA CARES Project Sponsor Management and Oversight Monitoring Exhibit:

- A. Grantee Management and Training Systems
- B. Internal Controls
- C. Performance Reporting
- D. On-Site and/or Remote Review of Projects Sponsors
- E. Summary of HUD Review for the Monitoring of Projects Sponsors Management and Oversight

If a grantee designated all or a portion of its FY2020 HOPWA Formula allocation on allowable COVID-19 activities in its Annual Action Plan (AAP), monitors should utilize the sections of this exhibit that apply to the grantee use of their FY 2020 formula funds for COVID-19 response. The monitor will utilize this exhibit to review the designated portion of FY 2020 funds for COVID-19 activities and HOPWA Exhibit (10-4) to monitor any FY 2020 funds not specifically designated for COVID-19 activities.

If the grantee did not designate FY 2020 HOPWA Formula funds for COVID-related activities, the monitor should move directly to Section B and all other areas that apply to the grantee's HOPWA-CV or HOPWA-C-CV grants. Sections A-D should be used to monitor all HOPWA-CV and HOPWA C-CV grant programs.

**Applicable Requirements and Waivers**

**Notice CPD-20-05:** <https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-05cpdn.pdf>

In addition to the applicable requirements at 24 CFR part 574, this exhibit assesses compliance with the specific requirements established for CARES Act funding, as provided by the HOPWA-CV and HOPWA-C-CV grant agreements and Notice CPD-20-05: Coronavirus Aid, Relief, and Economic Security Act Implementation Instructions and Related Flexibilities for the Housing Opportunities for Persons With AIDS Program. Notice CPD-20-05, which HUD issued on May 8, 2020 and is incorporated by Article II of the HOPWA-CV and HOPWA-CV grant agreements, clarifies the requirements and authorities provided for HOPWA grants made under the CARES Act.

Importantly, section XII of Notice CPD-20-05 also provided:

- (1) HOPWA waivers HUD made available on March 31, 2020 for COVID-19 response were made applicable under the same conditions for HOPWA-CV and HOPWA-C-CV grants, except that the waivers could also be applied retroactively as described below.
- (2) Regulatory waiver flexibilities offered by HUD specific to the use of amounts in the HOPWA program in response to the COVID-19 pandemic may be deemed effective as of the date a grantee began preparing for coronavirus, which HUD shall presume to be no earlier than January 21, 2020, provided that grantees and project sponsors must:
  - a. maintain documentation demonstrating when the recipient began preparing for COVID-19, such as notes on formal planning meetings or call; and
  - b. maintain documentation to support any costs incurred by the recipient that the recipient plans to cover or reimburse with CARES Act grant funding.

**Questions:**

**A. GRANTEE MANAGEMENT AND TRAINING SYSTEMS**

1.

Did the grantee use case-by-case determinations in accordance with the criteria in 2 CFR 200.331 (or 2 CFR 200.330, as in effect before Nov. 12, 2020) to determine whether each contract or agreement the grantee used for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor under 2 CFR part 200? [2 CFR 200.331 (or 2 CFR 200.330 as in effect before Nov. 12, 2020); 24 CFR 574.605]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

2.

If the agreement or contract cast the party to receive funds in the role of a subrecipient for purposes of 2 CFR part 200, did the grantee verify that the party was an eligible project sponsor, as defined under 24 CFR 576.3, before executing the subaward with that party?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
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<p><b>NOTE:</b> If the agreement or contract case the party to receive funds in the role of contractor for purposes of part 200, the grantee’s procurement of that party and administration of that contract should be evaluated using the procurement exhibit in chapter 34.</p> <p>[Grant Agreement, Article VII (HOPWA-C-CV)/Article VI (HOPWA-CV)]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

3.

<p>In making a subaward to a project sponsor, has the grantee evaluated each project sponsor’s risk of noncompliance with the Federal statutes, regulations, and terms and conditions of the subaward for purposes of determining the appropriate project sponsor monitoring?</p> <p><b>NOTE:</b> This evaluation may include consideration of factors such as:</p> <ul style="list-style-type: none"> <li>• the project sponsor’s prior experience with the same or similar subawards;</li> <li>• the results of previous audits, including whether or not the project sponsor receives a Single Audit in accordance with Subpart F of 2 CFR part 200, and the extent to which the same or similar subaward has been audited as a major program;</li> <li>• whether the project sponsor has new personnel or new or substantially changed systems; and</li> <li>• the extent and results of previous HUD monitoring, if the project sponsor also receives funds directly from HUD.</li> </ul> <p>[2 CFR 200.332(b) (or 2 CFR 200.331(b) as in effect before Nov. 12, 2020) (; 24 CFR 574.605]</p>	<table style="width: 100%; border: none;"> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;"><b>Yes</b></td> <td style="border: none;"><b>No</b></td> <td style="border: none;"><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					
<p><b>Describe Basis for Conclusion:</b></p>							

4.

<p>For each subaward provided to a project sponsor, has the grantee clearly identified it as a subaward to a project sponsor and included the following information at the time of the subaward:</p> <ol style="list-style-type: none"> <li>a. Project Sponsor name (which must match the name associated with the unique entity identifier)?</li> <li>b. Project Sponsor’s unique entity identifier?</li> <li>c. Federal Award Identification Number (FAIN)</li> <li>d. Federal Award Date of the grantee’s award from HUD?</li> <li>e. Subaward period of performance start and end date?</li> <li>f. Subaward budget period start and end date? (<i>Note: Neglecting only to include specific information does not warrant a finding for subawards made before Nov. 12, 2020.</i>)</li> <li>g. Amount of HOPWA funds the grantee obligated to the project sponsor in the current financial obligation?</li> </ol>	<table style="width: 100%; border: none;"> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;"><b>Yes</b></td> <td style="border: none;"><b>No</b></td> <td style="border: none;"><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					

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<p>h. Total amount of HOPWA funds the grantee obligated to the project sponsor, including the grantee’s current financial obligation to the project sponsor?</p> <p>i. Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)?</p> <p>j. HUD’s name, the name of the grantee, and contact information for the awarding official of the grantee?</p> <p>k. CFDA/Assistance Listings number and title of the HUD program (<i>14.241 Housing Opportunities for Persons with AIDS</i>)?</p> <p>l. Indirect cost rate for the subaward, if applicable (which must be an approved Federally recognized indirect cost rate negotiated between the project sponsor and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the project sponsor (in compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in §200.414(f))?</p> <p>m. All requirements imposed by the grantee on the project sponsor so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the HUD award to the grantee, including each commitment the grantee must obtain from the Project Sponsor under 24 CFR 574.500(b)(1) through 574.500(b)(4)?</p> <p>n. Any additional requirements imposed by the grantee on the project sponsor in order for the grantee to meet its own responsibility to HUD, including identification of any required financial or performance reports?</p> <p>o. A requirement that the project sponsor permit the grantee and auditors to have access to the project sponsor’s records and financial statements as necessary for the grantee to meet its requirements under 2 CFR part 200?</p> <p>p. Appropriate terms and conditions concerning closeout of the subaward? [2 CFR 200.332(a) (or 2 CFR 200.331(a) as in effect before Nov. 12, 2020); 24 CFR 574.605; Grant Agreement, Article VI (HOPWA-CV)/Article VII (HOPWA-C-CV)]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

5.

<p>Does the grantee have standards and procedures for the oversight and monitoring of its project sponsors? (If “yes,” briefly describe below and, if written, attach a copy of relevant portions, as appropriate.)                  [24 CFR 574.500]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p><b>Yes No N/A</b></p>
<p><b>Describe Basis for Conclusion:</b></p>	

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6.

<p>Does the grantee monitor and/or review the performance of each project sponsor as necessary to ensure that the subaward was used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are being, or have been, achieved? (Attach the planned monitoring /review schedule, if available and as applicable.)  [24 CFR 574.500 and 576.605; 2 CFR 200.332(d) (or 2 CFR 200.331(d) as in effect before Nov. 12, 2020)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

7.

<p>Did the grantee’s monitoring of its project sponsor(s) include each of the following?</p> <ul style="list-style-type: none"> <li>• Reviewing financial and performance reports required by the grantee</li> <li>• Following-up and ensuring that the project sponsor takes timely and appropriate action on all deficiencies pertaining to the subaward detected through audits, on-site reviews, or other means</li> <li>• Issuing a management decision for audit findings pertaining specifically to the subaward as required by 2 CFR 200.521</li> </ul> <p>[2 CFR 200.332(d) (or 2 CFR 200.331(d) as in effect before Nov. 12, 2020); 24 CFR 574.500 and 574.605]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

8.

<p>a. Does the grantee verify that each project sponsor is audited as required by 2 CFR part 200, subpart F, when it is expected that the project sponsor’s Federal awards expended during the respective fiscal year equaled or exceeded the audit threshold set in 2 CFR 200.501?  [2 CFR 200.332(f) (or 2 CFR 200.331(f) as in effect before Nov. 12, 2020); 24 CFR 574.605]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

9.

<p>For each project sponsor receiving a subaward, has the grantee considered whether the results of the project sponsor audit, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to grantee’s own records?  [2 CFR 200.332(g) (or 2 CFR 200.331(g) as in effect before Nov. 12, 2020); 24 CFR 574.605]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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**Describe Basis for Conclusion:**

10.

If the grantee found any project sponsor noncompliant, did the grantee consider taking enforcement action against the project sponsor per 2 CFR 200.339 (or 2 CFR 200.338 as in effect before Nov. 12, 2020) and the program regulations? [2 CFR 200.332(h) (or 2 CFR 200.331(h) as in effect before Nov. 12, 2020); 24 CFR 574.605]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

11.

a. Provide the following information regarding the monitoring (on-site and/or remote) efforts that have been conducted by the grantee during the period under review: (Use the “tab” key to add additional rows or attach additional sheets.)

Project Sponsor Name	Dates Monitored	Number and Types of Finding	Date of Letter with Monitoring Results	Date(s) Findings Resolved

b. Of the project sponsors monitored in “a” above, what percentage does this represent of the total number of organizations funded by the grantee during the period under review?

**Describe Basis for Conclusion:**

12.

Describe the grantee’s processes for conducting annual or other periodic reviews to ensure quality monitoring, including appropriate documentation, requested actions, and follow-through on promised actions.

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**Describe Basis for Conclusion:**

13.

a. Do the grantee’s written monitoring reports clearly document the areas monitored and the conclusions reached? [24 CFR 574.500; 24 CFR 574.605; 2 CFR 200.332(d) (or 2 CFR 200.331(d) as in effect before Nov. 12, 2020)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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**Describe Basis for Conclusion:**

b. Where the grantee determined the project sponsor violated applicable requirements, did the grantees’ monitoring records include corrective actions and dates for resolution? [24 CFR 574.500; 24 CFR 574.605; 2 CFR 200.332(d)(2) (or 2 CFR 200.331(d)(2) as in effect before Nov. 12, 2020);]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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**Describe Basis for Conclusion:**

14.

a. Are monitoring results communicated timely to project sponsors?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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**Describe Basis for Conclusion:**

b. Are project sponsors given an opportunity to respond and/or clarify?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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**Describe Basis for Conclusion:**

15.

Use the information provided in the applicable APR, CAPER, IDIS, Action Plan or funding application to complete the table below and confirm with the grantee during the monitoring.  
[24 CFR 574.450]

Period of Performance	Project Sponsor Name	Amounts Committed	Amounts Expended in this Period	Balances

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17.

a. Do the grantee’s financial or program records document the total amount of HOPWA CARES Act funds obligated to each of its project sponsors? [24 CFR 574.450 and 24 CFR 574.500]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<b>Describe Basis for Conclusion:</b>
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b. Of the amounts obligated above, do records show what amounts remain unexpended? [24 CFR 574.450 and 24 CFR 574.500]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<b>Describe Basis for Conclusion:</b>
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c. If grantee utilized FY20 Formula funds, do the grantee’s financial or program records document the total amount of HOPWA CARES Act funds obligated to each of its project sponsors? [24 CFR 574.450 and 24 CFR 574.500, <i>For FY2020 formula funds:</i> 24 CFR 574.330(a)(1); FY2020 HOPWA Formula Grant Agreement, Article II; Notice CPD-20-05, Section V]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<b>Describe Basis for Conclusion:</b>
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d. If the grantee utilized FY20 Formula funds, of the amounts obligated above, do records show what amounts remain unexpended? [24 CFR 574.450 and 24 CFR 574.500, <i>For FY2020 formula funds:</i> 24 CFR 574.330(a)(1); FY2020 HOPWA Formula Grant Agreement, Article II; Notice CPD-20-05, Section V]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<b>Describe Basis for Conclusion:</b>
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18.

For the period being reviewed, compare a sample of the grantee’s project sponsor records with: <ul style="list-style-type: none"> <li>• for <u>formula grantees (HOPWA-CV)</u>, information in HUD’s Program Accounting System (PAS), the Consolidated Annual Performance and Evaluation Report (CAPER), and the Integrated Disbursement and Information System (IDIS); OR</li> <li>• for <u>competitive grants (HOPWA-C-CV)</u>, the Annual Performance</li> </ul>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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Report (APR), and IDIS. Are there any discrepancies which require correction? [24 CFR 574.500]	
<b>Describe Basis for Conclusion:</b>	

19.

Does the grantee have a method to ensure that project sponsors receive information, training, or technical assistance to facilitate compliance with HOPWA and HOPWA CARES Act program requirements applicable to the activities or projects they are carrying out? [24 CFR 574.410 and 24 CFR 574.500]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

20.

Describe the training or technical assistance provided to the project sponsors during the year being reviewed.			
Project Sponsor	Person(s) Trained	Topics	Date(s)

21.

Has the grantee provided appropriate resource materials to its project sponsors (e.g., HOPWA regulations, applicable CPD Notices, including Notice CPD-20-05)? [24 CFR 574.500 and 24 CFR 574.410]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

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22.

Does the grantee ensure that project sponsors maintain adequate financial and program records to document compliance with program requirements, including record retention? [24 CFR 574.450 and 574.530]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

23.

Does the grantee have a system to track program income generated by project sponsors' activities and make sure that program income is treated an addition to the HOPWA grant in accordance with HUD's grant agreement with the grantee and 2 CFR 200.307(e)(2)? [24 CFR 574.450; 24 CFR 574.605; 2 CFR 200.302(b)(3) and (b)(4); 2 CFR 200.307(e)(2); Grant Agreement, Article XII (HOPWA-CV)/Article XIV (HOPWA-C-CV);	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

**B. INTERNAL CONTROLS**

24.

Has the grantee established qualifications for the persons who conduct financial transactions on behalf of the project sponsors? (Describe qualifications below.) [24 CFR 574.410 and 24 CFR 574.500(a)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

25.

a. Does the grantee have policies and procedures to prevent any person who is an employee, agent, consultant, officer, or elected or appointed official of the project sponsor and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, ("covered person") from obtaining a financial interest or benefit from the activity, or having an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for that covered person or for those with whom that covered person has family or business ties, during that covered person's tenure or for one year thereafter?[24 CFR 574.500(a); 24 CFR 574.625]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>	

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26.

b. Does the grantee take appropriate action to address conflicts of interest, as needed? [24 CFR 574.500(a); 24 CFR 574.625]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	

C. PERFORMANCE REPORTING

27.

a. Formula Only- In reporting to HUD in the CAPER does the grantee collect complete, accurate, timely, and comprehensive performance data for all of its HOPWA project sponsor’s activities funded through the CARES Act or FY20 funding designated for COVID-19-related activities?  <b>NOTE:</b> For HOPWA Formula grants, the CAPER is due within 90 days after the end of the jurisdiction’s program year. For HOPWA Competitive grants, the APR is due to HUD within 90 days of the end of each 12-month operating period until all Grant Funds are expended. However, section X of Notice CPD-20-05 provided an extension of up to 90 days to any HOPWA grantee with a CAPER or APR due to HUD within six months of May 8, 2020, as long as the grantee submitted an email to HOPWA@hud.gov and notified the grantee’s local HUD Field Office.  [For HOPWA-CV: 24 CFR 574.520(a), 24 CFR 91.520(a), and Grant Agreement, Article XI; For HOPWA-C-CV: 24 CFR 574.520(a), Grant Agreement, Article XII]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	

b. Formula Only - Does the grantee have a tracking system or other method of documenting the receipt, review, and correction (as needed) of the annual performance reports from the project sponsors which are used to report to HUD through the grantee’s CAPER?  [24 CFR 574.500(a) and 24 CFR 574.520]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<b>Describe Basis for Conclusion:</b>	
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c. Competitive Only - In reporting to HUD in the APR, does the grantee collect complete, accurate, timely, and comprehensive performance data that is separate from grantees’ regular HOPWA Competitive grant for all its HOPWA project sponsor’s activities?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<p><b>NOTE:</b> For HOPWA Formula grants, the CAPER is due within 90 days after the end of the jurisdiction’s program year. For HOPWA Competitive grants, the APR is due to HUD within 90 days of the end of each 12-month operating period until all Grant Funds are expended. However, section X of Notice CPD-20-05 provided an extension of up to 90 days to any HOPWA grantee with a CAPER or APR due to HUD within six months of May 8, 2020, as long as the grantee submitted an email to HOPWA@hud.gov and notified the grantee’s local HUD Field Office.</p> <p>[For HOPWA-CV: 24 CFR 574.520(a), 24 CFR 91.520(a), and Grant Agreement, Article XI; For HOPWA-C-CV: 24 CFR 574.520(a), Grant Agreement, Article XII]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	
<p>d. Competitive Only - Does the grantee have a tracking system or other method of documenting the receipt, review, and correction (as needed) of the annual performance reports from the project sponsors to ensure there is no duplication of services with non-CARES Act HOPWA Competitive grant?                  [24 CFR 574.500(a) and 24 CFR 574.520]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <b>Yes No N/A</b></p>
<p><b>Describe Basis for Conclusion:</b></p>	

28.

<p>When providing oversight of reporting by project sponsors, does the grantee reviews the accuracy and verify the performance data?                  [24 CFR 574.500(a); 24 CFR 574.520]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <b>Yes No N/A</b></p>
<p><b>Describe Basis for Conclusion:</b></p>	

29.

<p>In reporting to HUD, does the grantee provide actual housing outputs (the number of individuals to be assisted during the year) in relation to planned targets and address any variations in performance or adjust program efforts?                  [24 CFR 574.520]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <b>Yes No N/A</b></p>
<p><b>Describe Basis for Conclusion:</b></p>	

30.

<p>Does the grantee report to HUD on its performance in achieving housing stability outcomes for beneficiaries (the number of households in stable living situations) and assess variations in planned performance and, as applicable, document and report program adjustments?                  [24 CFR 574.520]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>  <b>Yes No N/A</b></p>
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**Describe Basis for Conclusion:**

31.

If the grantee utilized FY20 formula funds, Does the grantee report to HUD on its performance in achieving housing stability outcomes for beneficiaries (the number of households in stable living situations) and assess variations in planned performance and, as applicable, document and report program adjustments? [24 CFR 574.520, <i>For FY2020 formula funds</i> : 24 CFR 574.330(a)(1); FY2020 HOPWA Formula Grant Agreement, Article II; Notice CPD-20-05, Section V]]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

**D. ON-SITE AND/OR REMOTE REVIEW OF PROJECT SPONSORS BY HUD**

**Instructions:** Sample a selected group of project sponsors to review on-site or remotely as a way of determining the effectiveness of the grantee's monitoring efforts during the year under review. Review the grantee's monitoring reports for the organizations selected. One form should be completed for each organization reviewed. Attach additional sheets as necessary to reflect the results.

To select a sample, request a list of the project sponsors which were using HOPWA CV or HOPWA C-CV funds during the operating year under review and any associated information on the grantee's monitoring of these entities (e.g., records and review dates, any concerns or findings identified by the grantee).

Name of HOPWA project sponsor:

Program or Project Name:

Records/Data Reviewed:

Concerns/Findings (identified by grantee, if any):

Exhibit 36-3C  
Housing Opportunities for Persons With AIDS (HOPWA) Program  
Coronavirus Relief and Economic Security Act (CARES Act)

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31.

<p><b>[OS]</b> Did the grantee monitor this project sponsor on-site or remotely? (If yes, provide the date of the most recent monitoring.)</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

32.

<p><b>[OS]</b> Based on your review, does there appear to be any significant differences between actual performance and the reported performance submitted by this project sponsor to the grantee?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<p>[24 CFR 574.500(a)]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

33.

<p><b>[OS]</b> In interviewing the project sponsor staff, do they appear to possess an adequate understanding of HOPWA and HOPWA CARES Act rules and other applicable regulations?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<p>[24 CFR 574.410]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

34.

<p><b>[OS]</b> If this project sponsor was monitored by the grantee, did your review detect any problems or findings that were previously unknown to the grantee?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<p>[24 CFR 574.50(a)]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

Exhibit 36-3C  
Housing Opportunities for Persons With AIDS (HOPWA) Program  
Coronavirus Relief and Economic Security Act (CARES Act)

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E. SUMMARY OF HUD REVIEW

35.

Based on the results of your review, does the grantee demonstrate that its management and oversight of its project sponsors is sufficient to provide reasonable assurance that funded activities comply with HOPWA and HOPWA CARES Act requirements? [24 CFR 574.500(a); 24 CFR 574.605; 2 CFR 200.332 (or 2 CFR 200.331 as in effect before Nov. 12, 2020);]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>  	

36.

Does your review indicate any recommended actions to address project sponsor management deficiencies?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>  	

37.

Does your review indicate that the grantee needs technical assistance for its project sponsor oversight?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
<b>Describe Basis for Conclusion:</b>  	