

Exhibit 36-4B
 Emergency Solutions Grants (ESG) Program
 Coronavirus Relief and Economic Security Act (CARES Act)

6509.2 REV-7 CHG 4

Guide for Review of ESG Recipient’s Overall Grant Management of ESG-CV			
Name of Recipient:			
Names of All Subrecipient(s):			
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, or grant agreement). If the requirement is not met, HUD must select “NO” in response to the question and 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 recipient’s compliance with overall grant management requirements of the Emergency Solutions Grants (ESG) program as funded and modified under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), otherwise known as ESG-CV. Requirements at 24 CFR Part 576 apply to the use of these funds, unless otherwise provided by the alternative requirements and flexibilities established under the CARES Act, Notice CPD-21-08, Notice CPD-22-06, or other HUD waivers or CPD Notices. Notice CPD-21-08, published July 19, 2021, supersedes Notice CPD-20-08 and reestablishes the allocation formula and amounts and reestablishes and announces new requirements for ESG funding.

As provided in Notice CPD-21-08 and Notice CPD-22-06, recipients that received particularized waivers or exceptions are permitted to apply those waivers and exceptions subject to the conditions provided in those waivers or exceptions, although they may also use any further flexibility provided in Notice CPD-21-08 under the conditions and alternative requirements provided in the Notice.

All waivers HUD has provided for ESG-CV funds under the CARES Act waiver authority apply retroactively as provided by the CARES Act (NOTE: waivers provided under the waiver authority in 24 CFR 5.110 are not retroactive, even if applied to ESG-CV grants). Except as otherwise stated in Notice CPD-21-08, waivers and alternative requirements HUD provided as authorized by the CARES Act were deemed to be effective as of the date a State or unit of local government began preparing for coronavirus, which HUD presumes to be January 21, 2020 – the date the first confirmed case was reported in the United States. However, each recipient must maintain adequate documentation (including documentation demonstrating when their particular state or local government began preparing for coronavirus) to assure these waivers and alternative requirements are used only with respect to ESG- or ESG-CV-eligible activities the recipient or its subrecipients implemented to prevent, prepare for, and respond to coronavirus.

This Exhibit is to be used to monitor not only the use of ESG-CV grant funds, but the use of FY 2020 and older ESG grant funds the recipient designated for use in preventing, preparing for, and responding to coronavirus. A recipient may have expended annual ESG funds both for activities

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used to prevent, prepare for, and respond to coronavirus as well as activities not specifically designated for coronavirus response. In those cases, monitors are instructed to use the Exhibits in Chapter XX to monitor annual ESG-funded activities designated for coronavirus response; Exhibits in Chapter 28 are to be used to monitor annual ESG-funded activities not designated for coronavirus response.

HUD reviewers should use a combination of the information in program files and recipient staff interviews to answer the questions below. The Exhibit is divided into eight sections: Grants Management and Oversight; Systems Coordination Requirements; Recordkeeping; Homeless Management Information System (HMIS); Other ESG-Specific Requirements; Financial Management; Violence Against Women Act; and Equal Access Rule.

To reduce potential overlap, this Exhibit focuses on requirements that are not covered by other Exhibits. Accordingly, however, monitors must supplement this Exhibit with relevant questions from other Exhibits in this chapter and chapter 34. For example, when assessing financial management and internal controls, the monitor must use the questions provided in parts A, B and E of Exhibit 34-1a.

This Exhibit can be used to either monitor the recipient alone, the recipient with a single subrecipient, or the recipient with multiple subrecipients. It is the responsibility of the HUD reviewer to ensure that the responses provide sufficient documentation to support the basis for the conclusions. Keep in mind that, if multiple entities are reviewed and a deficiency is identified for a single entity, a “No” response is required.

Questions:

A. GRANT MANAGEMENT AND OVERSIGHT

1.

<p>Carrying Out Grant Activities (States): If the recipient is a state (including the Commonwealth of Puerto Rico), did it subgrant only to the types of entities to which it was allowed to subgrant ESG-CV funds?</p> <p>NOTE: Under 24 CFR 576.202(a) and the waivers and alternative requirements in section III.A.1 of Notice CPD-21-08, states (including Puerto Rico) may subgrant ESG-CV funds to private nonprofit organizations, local governments (as defined in Section I.B.1.c of Notice CPD-21-08), public housing agencies, local redevelopment authorities, Indian tribes, or tribally designated housing entities. Under section III.A.1.d and III.A.3 of Notice CPD-21-08, the Commonwealth of Puerto Rico may <u>also</u> subgrant ESG-CV funds to an instrumentality of the Commonwealth, provided that an instrumentality has not been designated to act as the recipient for Puerto Rico.</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;">Yes</td> <td style="border: none;">No</td> <td style="border: none;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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[24 CFR 576.202(a) and section III.A.1 of Notice CPD-21-08]	
Describe Basis for Conclusion:	

2.

<p><u>Carrying Out Grant Activities (States):</u> If the recipient is a state (including the Commonwealth of Puerto Rico) and used its grant to carry out ESG activities directly, other than as 24 CFR 576.202(a) permits for HMIS Lead activities, did the recipient—</p> <p style="margin-left: 20px;">a. specify the activities to be carried out and the amount allocated for those activities in the recipient’s initial FY 2020 action plan submission or an amendment to its most recently approved action plan; and</p> <p style="margin-left: 20px;">b. submit the certifications provided in Appendix I of Notice CPD-20-08 or CPD-21-08?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[24 CFR 576.202(a) and section III.A.1.a. of Notice CPD-21-08]	
Describe Basis for Conclusion:	

3.

<p><u>Carrying Out Grant Activities (States):</u> If a state has subgranted funds directly to private nonprofit organizations for emergency shelter activities, has the recipient obtained the appropriate certification of approval from the unit of general purpose local government for the geographic area in which those activities were carried out?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[24 CFR 576.202(a)]	
Describe Basis for Conclusion:	

4.

<p><u>Carrying Out Grant Activities in Indian Areas:</u> If the recipient is carrying out activities in an Indian Area (whether through its employees, contractors, or subrecipients), did the recipient obtain the consent of the Indian tribe with jurisdiction over the Indian Area?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[Notice CPD-21-08, Section III.F.1]	

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Describe Basis for Conclusion:

5.

<p>Carrying Out Grant Activities (Territories): If the recipient is a territory, were all activities carried out through employees of the territory (as defined in Section III.A.3.b. of Notice CPD-21-08); procurement contracts; or subgrants to private nonprofit organizations, instrumentalities, or municipalities?</p> <p>[24 CFR 576.202(b); Notice CPD-21-08, Sections III.A.2.b. and III.A.3]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

6.

<p>Carrying Out Grant Activities (Metropolitan Cities): If the recipient is a metropolitan city, were all activities carried out through employees of the local government (as defined in Section I.B.1.c of Notice CPD-21-08); procurement contracts; or subgrants to private nonprofit organizations, public housing agencies, local redevelopment authorities, Indian tribes, or tribally designated housing entities?</p> <p>[24 CFR 576.202(b); Notice CPD-21-08, Section III.A.2.a]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

7.

<p>Carrying Out Grant Activities (Urban Counties):</p> <p>a. If the recipient is an urban county, were all activities carried out through employees of the local government (as defined in Section I.B.1.c of Notice CPD-21-08); member governments of the urban county; subgrants to private nonprofit organizations, public housing agencies, local redevelopment authorities, Indian tribes, or tribally designated housing entities; or procurement contracts?</p> <p>b. If activities were carried out through member governments of the urban county, did the recipient ensure that the local governments were in compliance with the ESG requirements that apply to local government subrecipients?</p> <p>[24 CFR 576.202(b); Section III.A.2. of Notice CPD-21-08]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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Describe Basis for Conclusion:

8.

<p><u>Obligation Requirements (States):</u></p> <p>a. If the recipient is a state (including the Commonwealth of Puerto Rico), did it obligate the entire grant (except the amount for its administrative costs and any funds reallocated to the recipient as provided by Notice CPD-22-06) within 240 days of the date HUD signed the grant agreement for the first allocation of ESG-CV funds?</p> <p>NOTE: For purposes of this question, an obligation to a subrecipient must be evidenced by either a subgrant agreement with, or a letter of award requiring payment from the grant to, a subrecipient.</p> <p>[24 CFR 576.203(a)(1)(i) and Section III.B.1.a. of Notice CPD-21-08]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>b. If the recipient is a state (including the Commonwealth of Puerto Rico) used funds to carry out eligible activities directly, as permitted by Section III.A.1.a of CPD Notice 21-08, did the recipient obligate the funds for those activities (except funds reallocated to the recipient as provided by Notice CPD-22-06) within 180 days of the date HUD signed the grant agreement for the first allocation of ESG-CV funds? (This obligation may be evidenced by a written designation within the government to carry out an eligible activity directly.)</p> <p>[24 CFR 576.203(a)(1)(i) and Section III.B.1.a. of Notice CPD-21-08]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>			

9.

<p><u>Obligation Requirements for Reallocated Funds (States):</u></p> <p>a. If the recipient is a state (including the Commonwealth of Puerto Rico) that received reallocated funds via the reallocation process outlined under Notice CPD-22-06, did the recipient obligate those funds to subrecipients within 180 days of the date HUD signed the grant agreement amendment for reallocated funds?</p> <p>NOTE: For purposes of this question, an obligation to a subrecipient must be evidenced by either a subgrant agreement with, or a letter of award requiring payment from the grant to, a subrecipient.)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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[24 CFR 576.203(a)(1)(i) and Section VII.E.2 of Notice CPD-22-06]	
<p>b. If the recipient (including the Commonwealth of Puerto Rico) received reallocated funds via the reallocation process outlined under Notice 22-06 and used those funds to carry out eligible activities directly, as permitted by Section III.A.1.a of CPD Notice 21-08, did the recipient obligate the funds for those activities within 180 days of the date HUD signed the grant agreement amendment for reallocated funds? (This obligation may be evidenced by a written designation within the government to carry out an eligible activity directly.)</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[24 CFR 576.203(a)(1)(i) and Section VII.E.1 of Notice CPD-22-06]	
Describe Basis for Conclusion:	

10.

<p><u>Obligation Requirements (Local Governments/Territories):</u> If the recipient is a metropolitan city, urban county, or territory, did the recipient obligate the full grant amount (except the amount for its administrative costs and funds reallocated to the recipient as provided by Notice CPD-22-06) within 240 days of the date HUD signed the grant agreement for the first allocation of ESG-CV funds?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>NOTE: This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity.)</p>	
[24 CFR 576.203(a)(2) and Section III.B.1.b. of Notice CPD-21-08]	
Describe Basis for Conclusion:	

11.

<p><u>Obligation Requirements for Reallocated Funds (Local Governments/Territories):</u> If the recipient is a metropolitan city, urban county, or territory that received reallocated funds via the reallocation process outlined under Notice CPD-22-06, did the recipient obligate all of those funds except its share of admin funds within 180 days after the date</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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that HUD signed the grant agreement amendment for reallocated funds? NOTE: This obligation requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity. [24 CFR 576.203(a)(2)]	
Describe Basis for Conclusion:	

12.

<u>Draw Down and Expenditure Rate:</u> Do the recipient's records document that the recipient drew down and expended funds from the grant at least once during each quarter of the program year? [24 CFR 576.203(b); 24 CFR 576.500(u)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

13.

a. <u>20 Percent Expenditure Deadline for ESG-CV grants:</u> Do the recipient's records demonstrate that the recipient expended at least 20% of its total ESG-CV grant (including first and second allocation amounts) for allowable costs by September 30, 2021? [Section III.B.2.c(i) of Notice CPD-21-08]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
b. <u>50 Percent Deadline for Drawing Down ESG-CV grants:</u> Do the recipient's records demonstrate that the recipient drew down or is projected to draw at least 50 percent of its total ESG-CV grant (including first and second allocation amounts) for allowable costs by June 16, 2022? NOTE: If evaluating compliance with this question prior to the June 16, 2022 deadline and current draws indicate it is unlikely the recipient will meet the draw down threshold, monitors should answer "no" and issue a concern rather than a finding.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A

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[Section V.B of Notice CPD-22-06]	
<p>c. <u>Overall Deadline for Expending First and Second Allocations (except for administration and HMIS funds necessary for ESG-CV closeout):</u> Do the recipient’s records demonstrate that the recipient met or is projected to meet the September 30, 2023 deadline for expending all ESG-CV grant funds, except administration and HMIS funds necessary for ESG-CV closeout and funds reallocated to the recipient as provided by Notice CPD-22-06?</p> <p>NOTE: If evaluating compliance with this question prior to the overall deadline and current expenditures indicate it is unlikely the recipient will fully expend all ESG-CV grant funds, monitors should answer “no” and issue a concern rather than a finding.</p> <p>[Section V.A.1 of Notice CPD-22-06]</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A </p>
<p>d. <u>Overall Deadline for Expending First and Second Allocations (administration and HMIS funds necessary for ESG-CV closeout only):</u> If the recipient reserved funds from its original grant (i.e., the amount received through the first and second allocations) for administration or HMIS costs necessary for ESG-CV closeout, do the recipient’s records demonstrate that the recipient expended or is projected to expend all of those funds for allowable administration and HMIS costs by December 31, 2023?</p> <p>NOTE: If evaluating compliance with this question prior to the overall deadline and current expenditures indicate it is unlikely the recipient will fully expend all ESG-CV grant funds, monitors should answer “no” and issue a concern rather than a finding.</p> <p>[Section V.A.1 of Notice CPD-22-06]</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A </p>

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e. <u>Overall Deadline for Expending Reallocated Funds</u> : If the recipient received reallocated funds, do the recipient’s records demonstrate that the recipient expended or is projected to expend all of those funds by June 30, 2024? NOTE: If evaluating compliance with this question prior to the overall deadline and current expenditures indicate it is unlikely the recipient will fully expend all ESG-CV grant funds, monitors should answer “no” and issue a concern rather than a finding. [Section V.A.2 of Notice CPD-22-06]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

14.

<u>Payments to Subrecipients</u> : Did the recipient pay each subrecipient for allowable costs within 30 days after receiving the subrecipient’s complete payment request? [24 CFR 576.203(c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

15.

<u>Documentation in the Integrated Disbursement and Information System (IDIS)</u> : Did the recipient enter complete, up-to-date information on all ESG-CV funded activities in the IDIS, including the total funding allocated to that activity and a description of how the activity prevents, prepares for, and responds to coronavirus? [Section III.B.2.a. of Notice CPD-21-08]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

16.

<u>Monitoring</u> : Does the recipient monitor its activities to assure compliance with applicable program requirements and that performance expectations are being achieved? NOTE:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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Monitoring by the recipient must cover each program, function, or activity. [24 CFR 576.407(c); 2 CFR 200.329(a) (or 2 CFR 200.328(a) as in effect before November 12, 2020)]	
Describe Basis for Conclusion:	

17.

If the recipient provides funds through either a subrecipient agreement or a contract, has it followed the criteria in 2 CFR 200.331 (formerly 200.330) for making case-by-case determinations of whether the entity is receiving the funds in the role of either a subrecipient or contractor? [24 CFR 576.407(c) and 2 CFR 200.331 (or 2 CFR 200.330 as in effect before November 12, 2020)]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

18.

In making an award to a subrecipient, has the recipient evaluated each subrecipient’s risk of noncompliance with the Federal statutes, regulations, and terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring? NOTE: This evaluation may include consideration of factors such as: <ul style="list-style-type: none"> • the subrecipient’s prior experience with the same or similar subawards; • the results of previous audits, including whether or not the subrecipient 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; • whether the subrecipient has new personnel or new or substantially changed systems; and • the extent and results of previous HUD monitoring, if the subrecipient also receives funds directly from HUD. [24 CFR 576.407(c) and 2 CFR 200.332(b) (or 2 CFR 200.331(b) as in effect before November 12, 2020)]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

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19.

For each subaward provided to a subrecipient, was the subaward clearly identified as a subaward to a subrecipient and did it include the required information listed below at the time of the subaward? [24 CFR 576.407(c) and 2 CFR 200.332(a) (or 2 CFR 200.331(a) as in effect before Nov. 12, 2020)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
a. Subrecipient name (which must match the name associated with the unique entity identifier)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
b. Subrecipient's unique entity identifier?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
c. Federal Award Identification Number (FAIN)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
d. Federal Award Date, (the date that HUD signed the award to the recipient)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
e. Subaward period of performance start and end date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
f. Total amount of the Federal award committed to the subrecipient by the recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
g. Amount of Federal funds obligated by this action by the recipient to the subrecipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
h. Total amount of Federal funds obligated to the subrecipient by the recipient, including the current obligation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
i. Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
j. HUD's name, the name of the recipient, and contact information for the awarding official of the recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
k. Assistance Listings number and title (formerly, Catalog of Federal Domestic Assistance (CFDA) number and name of the HUD program under which the award is made)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
l. Indirect cost rate for the subaward (which must be an approved Federally-recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the recipient and the subrecipient (in	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

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compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in 24 CFR 200.414(f)?	
<p>m. All requirements imposed by the recipient on the subrecipient so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the HUD award to the recipient?</p> <p>NOTE: Monitors should ensure that recipients have included applicable ESG-CV requirements in the subaward, such as:</p> <ul style="list-style-type: none"> • CARES Act prohibition on prerequisite activities; • Duplication of Benefits requirements; • Limitation on the use of ESG-CV funds only to prevent, prepare for and respond to coronavirus as defined in Section I.B.2.i. of Notice CPD-21-08 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>n. Any additional requirements imposed by the recipient on the subrecipient in order for the recipient to meet its own responsibility to HUD, including identification of any required financial or performance reports?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>o. A requirement that the subrecipient permit the recipient and auditors to have access to the subrecipient's records and financial statements as necessary for the recipient to meet its requirements under 2 CFR part 200?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>p. Appropriate terms and conditions concerning closeout of the subaward?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

20.

<p>a. For subawards provided to subrecipients, has the recipient monitored the activities of the subrecipient 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?</p> <p>[24 CFR 576.407(c) and 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"/> Yes No N/A
Describe Basis for Conclusion:	

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b. Did the recipient’s monitoring of the subrecipient include:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<ul style="list-style-type: none"> • Reviewing financial and performance reports required by the recipient? [24 CFR 576.407(c) and 2 CFR 200.332(d)(1) (or 2 CFR 200.331(d)(1) as in effect before Nov. 12, 2020)] 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<ul style="list-style-type: none"> • Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the subaward detected through audits, on-site reviews, or other means? [24 CFR 576.407(c) and 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"/>
	Yes	No	N/A
<ul style="list-style-type: none"> • Issuing a management decision for audit findings pertaining to the subaward a required by 2 CFR 200.521? [24 CFR 576.407(c) and 2 CFR 200.332(d)(3) (or 2 CFR 200.331(d)(3) as in effect before Nov. 12, 2020)] 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<ul style="list-style-type: none"> • Resolving audit findings specifically related to the award? [24 CFR 576.407(c) and 2 CFR 200.332(d)(4)] 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

21.

a. For each subrecipient, has the recipient determined whether the subrecipient met or is expected to meet the audit threshold set in 2 CFR 200.501? [24 CFR 576.407(c) and 2 CFR 200.332(f) (or 2 CFR 200.331(f) as in effect before Nov. 12, 2020)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
b. If a subrecipient met or is expected to meet the audit threshold in 2 CFR 200.501, did the recipient verify that the subrecipient was audited (or will be audited) as required by Subpart F of 2 CFR part 200? [24 CFR 576.407(c) and 2 CFR 200.332(f) (or 2 CFR 200.331(f) as in effect before Nov. 12, 2020)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

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22.

Can the recipient demonstrate that it systematically considers whether the results of each subrecipient’s audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the recipient’s own records? [24 CFR 576.407(c) and 2 CFR 200.332(g) (or 2 CFR 200.331(g) as in effect before Nov. 12, 2020)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

23.

<u>Recipient Sanctions:</u> a. If the recipient determined that a subrecipient failed to comply with an ESG program requirement or its subgrant agreement, did the recipient take appropriate actions, as prescribed for HUD under 24 CFR 576.501(a) and (b)? [24 CFR 576.501(c)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
b. If funds became available due to the recipient’s sanctions against a subrecipient, did the recipient comply with the applicable reallocation requirements in 24 CFR 576.501(c)? [24 CFR 576.501(c)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

24.

Did the recipient publish how it has used and will use its ESG-CV allocation, at a minimum, on the Internet at the appropriate government website or through other electronic media? [Overview Information, Section F.2.b of Notice CPD-21-08]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

25.

<u>Changes to the Program.</u> If the recipient: a. made changes in its allocation priorities or method of distribution of grant funds,	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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<p>b. carried out an activity not previously described in the recipient’s Consolidated Plan, or</p> <p>c. changed the purpose, scope, location, or beneficiaries of an activity, did the recipient amend its approved Consolidated Plan and submit the amendment to HUD in accordance with the requirements of 24 CFR 91.505, subject to the exception that the consultation or citizen participation requirements do not apply to ESG-CV funds, provided that the planned changes are published, at a minimum, on the Internet at the appropriate Government web site or through other electronic media?</p>	
<p>[24 CFR 576.200(b) and Notice CPD-21-08, Overview Information, F.2.d.]</p>	
<p>Describe Basis for Conclusion:</p>	

26.

<p><u>Use of the Coordinated Assessment System:</u> Does the documentation show that each ESG-CV funded program or project within the CoC’s area is participating in the CoC’s coordinated assessment system, except as otherwise provided by the ESG program rule and HUD’s waivers and alternative requirements?</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>NOTES:</p> <ul style="list-style-type: none"> • Under the ESG program rule (24 CFR 576.400(d)), ESG-funded victim service providers may choose not to use the CoC’s coordinated assessment system. • With respect to costs incurred between January 21, 2020 and June 30, 2020 that are allowable under Notice CPD 21-08 but not under 24 CFR Part 576, HUD waived the requirement to use the CoC’s coordinated assessment system under 24 CFR 576.400(d) <u>for the first 60 days of the project’s operation</u>, as provided by Section III.F.5 of Notice CPD-21-08. 							
<p>[24 CFR 576.400(d); 24 CFR 576.500(g)]</p>							
<p>Describe Basis for Conclusion:</p>							

27.

<p><u>Coordinated Assessment (Consistency with Written Standards):</u></p> <p>a. Did the recipient work with the local CoC to ensure that the screening, assessment, and referral of program applicants through the CoC’s coordinated assessment system are consistent with the ESG written standards required under 24 CFR 576.400(e) – including with respect</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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to new activities, populations, and subrecipients the recipient added to its ESG program as provided under the CARES Act and HUD’s waivers and alternative requirements for ESG-CV? (Please note the clarification provided in the NOTES above for Question 23 “Use of the Coordinated Assessment System.”) [24 CFR 576.400(d)]	
b. Were all initial evaluations of ESG-CV program participants conducted in accordance with the CoC’s coordinated assessment system requirements, except as otherwise provided by the ESG program rule and HUD’s waivers? (Please note the clarification provided in the NOTES above for Question 23 “Use of the Coordinated Assessment System.”) [24 CFR 576.401(a)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

28.

<p><u>Centralized or Coordinated Assessment Costs:</u> If the recipient used ESG-CV funds for centralized or coordinated assessment system costs beyond those that are necessary and directly related to the required use of that system for ESG-funded assistance, can the recipient demonstrate that:</p> <ul style="list-style-type: none"> • the additional costs were needed to update, enhance, and operate the applicable centralized or coordinated assessment system under 24 CFR 576.400(d) to prevent, prepare for, and respond to coronavirus; • the cost documentation shows the use of ESG-CV funds for these additional costs was limited to the increase in system costs due to coronavirus; and • the use of ESG-CV funds for these costs was coordinated with the applicable Continuum of Care to ensure the funding was used for the most critical centralized or coordinated assessment needs to allow the CoC to quickly prioritize and refer to assistance individuals and families experiencing homelessness and individuals and families at risk of homelessness? <p>[Section III.E.3.k of Notice CPD 21-08]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

29.

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<p>Establishing Written Standards (States):</p> <p>a. If the recipient is a state, did it establish and consistently apply, or ensure that its subrecipients established and consistently applied, written standards for providing ESG assistance to all program participants, except as otherwise provided by HUD’s waivers?</p> <p>NOTE: With respect to costs incurred between January 21, 2020 and June 30, 2020 that are allowable under Notice CPD-21-08 but not under 24 CFR Part 576, HUD waived the requirement to apply written standards for administering assistance as provided under 24 CFR 576.400(e) <u>for the first 60 days of the project’s operation</u>, as provided by Section III.F.5 of Notice CPD-21-08.</p> <p>[24 CFR 576.400(e)(2)]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>b. Were the applicable written standards updated to account for all new activities, populations, and subrecipients the recipient added to the ESG program as allowed under the CARES Act and HUD’s waivers and alternative requirements for ESG-CV?</p> <p>[24 CFR 576.400(e)(2)]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>			

30.

<p>Establishing Written Standards (Local Governments/Territories):</p> <p>a. If the recipient is a local government or territory, did it consistently apply, and ensure that its subrecipients consistently applied, its written standards for the provision of ESG assistance to all program participants, except as otherwise provided by HUD’s waivers? (Please note the clarification provided in the NOTES above for Question 25 “Establishing Written Standards (States).”)</p> <p>[24 CFR 576.400(e)(1)]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>b. Were the applicable written standards updated to account for all new activities, populations, and subrecipients the recipient added to its ESG program as allowed under the CARES Act and HUD’s waivers and alternative requirements for ESG-CV?</p> <p>[24 CFR 576.400(e)(1)]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>			

31.

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Establishing Written Standards: Did the recipient ensure that the written standards include all of the required elements? [24 CFR 576.400(e)(3)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

B. RECORDKEEPING

32.

Recordkeeping (Record Retention): a. Did the recipient have written policies and procedures to ensure that ESG funds are used in accordance with the requirements specified by the recipient and HUD, including with respect to the new populations, activities, and subrecipients the recipient added to its ESG program as allowed under the CARES Act and HUD’s waivers and alternative requirements for ESG-CV? [24 CFR 576.500(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
b. Were sufficient records established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met? [24 CFR 576.500(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

33.

Recordkeeping (Subrecipients): Did the recipient retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable? [24 CFR 576.500(v)(1)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

34.

Recordkeeping (Contractors): If the recipient procured goods and services, did its records document that it did so in compliance with the requirements of the Uniform Administrative Requirements, or the alternative	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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<p>requirements established by HUD in Notices CPD-20-08 and CPD-21-08, and did the recipient retain copies of all procurement contracts?</p> <p>NOTE: As provided by the CARES Act, recipients may deviate from the applicable procurement standards (e.g., 24 CFR 576.407(c) and (f) and 2 CFR 200.317-200.326) when procuring goods and services to prevent, prepare for, and respond to coronavirus. However, Notices CPD-20-08 (Sept. 1, 2020) and CPD-21-08 (July 17, 2021) included the alternative requirement that if the recipient deviates from its procurement standards then the recipient must establish alternative written procurement standards, and maintain documentation on the alternative procurement standards used to safeguard against fraud, waste, and abuse in the procurement of goods and services to prevent, prepare for, and respond to coronavirus. Additionally, Notices CPD-20-08 (Sept. 1, 2020) and CPD-21-08 (July 17, 2021) clarified that the debarment and suspension regulations at 2 CFR part 180 and 2 CFR part 2424 apply as written. To assess compliance with procurement requirements in 2 CFR part 200, please refer to chapter 34 of the monitoring handbook.</p> <p>[24 CFR 576.404(b); 2 CFR 200.317-200.326 (as applicable); and 24 CFR 576.500(v)(2); Section III.F.9 of Notice CPD-21-08]</p>	
Describe Basis for Conclusion:	

35.

<p>Recordkeeping (Program Participant Eligibility): Does the recipient have written policies and procedures in place that ensure that the recipient and/or its subrecipients are:</p> <ul style="list-style-type: none"> • conducting an initial evaluation and re-evaluations as required, and • documenting eligibility in accordance with HUD requirements? <p>NOTES:</p> <ul style="list-style-type: none"> • The CARES Act incorporates the FY2020 Appropriation Act’s conditions on ESG funding which provide that: <ul style="list-style-type: none"> ○ Youth aged 24 and under seeking assistance shall not be required to provide third party documentation to establish their [homeless status] to receive services; and ○ Unaccompanied youth aged 24 and under or families headed by youth aged 24 and under who are living in unsafe situations may be served by youth-serving providers • Notices CPD-20-08 (September 1, 2020) and CPD-21-08 (July 17, 2021) included the following alternative requirements: 	<table style="width: 100%; border: none;"> <tr> <td style="text-align: center; width: 33%;"><input type="checkbox"/></td> <td style="text-align: center; width: 33%;"><input type="checkbox"/></td> <td style="text-align: center; width: 33%;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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<ul style="list-style-type: none"> ○ that an individual may qualify has homeless under paragraph (1)(iii) of the homeless definition in 24 CFR 576.2 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution; ○ that individuals and families who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition and have an annual income that does not exceed the Very Low-Income limit for the area as established by HUD are eligible for homelessness prevention assistance; ○ that the re-evaluation for rapid re-housing and homelessness prevention assistance must verify the program participant does not have an annual income that exceeds the Very Low-Income limit for the area as established by HUD to continue receiving homelessness prevention and rapid re-housing assistance ○ that the required 3-month frequency of re-evaluations for homelessness prevention assistance is waived so long as the recipient or subrecipient conducts the required re-evaluations not less than once every 6 months ● Notice CPD 21-05 (April 14, 2021) provided a waiver that expanded the scope of eligible beneficiaries of rapid re-housing assistance includes individuals and families who meet all of the criteria established under Notice CPD-21-05. ● With respect to costs incurred between January 21, 2020 and June 30, 2020 that are allowable under Notice CPD 21-08 but not under 24 CFR Part 576, HUD waived, <i>for the first 60 days of the project’s operation</i>, the requirement to apply written standards for administering assistance as provided under 24 CFR 576.400(e) and the requirement to use the CoC’s coordinated assessment system under 24 CFR 576.400(d), as stated in Notice CPD-21-08, Section III.F.5. <p>[24 CFR 576.400(e)(3); 24 CFR 576.401(a), (b), and (c); 24 CFR 576.500(a), (b), (c), and (e); ESG-CV Grant Agreement]</p>	
<p>Describe Basis for Conclusion:</p>	

36.

<p><u>Recordkeeping (Services and Assistance Provided):</u> Did the recipient maintain records of, or ensure that its subrecipients maintain records of, the types of essential services, rental assistance, and housing stabilization and relocation services provided, including the amounts expended on these services and assistance?</p> <p>[24 CFR 576.500(l)]</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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Describe Basis for Conclusion:

37.

<p>Recordkeeping (Record Retention): Has the recipient developed and implemented policies or subaward requirements to make sure copies of records required under 24 CFR 576.500 are retained for the greater of 5 years or the applicable time period below:</p> <p style="margin-left: 20px;">a. for emergency shelters subject to a 10-year minimum period of use under 24 CFR 576.102(c)(1)—at least 10 years after the date that ESG funds were first obligated for the major rehabilitation or conversion of the building; or</p> <p style="margin-left: 20px;">b. for program participant files—at least 5 years after the expenditure of all funds from the grant under which the program participant was served?</p> <p>NOTE: Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.</p> <p>[24 CFR 576.500(y)]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><input type="checkbox"/></td> <td style="width: 33%;"><input type="checkbox"/></td> <td style="width: 33%;"><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

C. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

38.

<p>Data Collection and Recordkeeping: Can the recipient demonstrate that data on <u>all</u> persons served under the grant, including under all eligible ESG-CV activities, as well as project-level data for all ESG-CV activities are entered as required in the applicable community-wide HMIS, except as otherwise provided by the ESG program rule and HUD waivers?</p> <p>NOTES: 24 CFR 576.400(f) allows victim service providers and legal services providers to use a comparable database <u>instead of</u> HMIS, provided that the comparable database collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data.</p> <ul style="list-style-type: none"> • For costs incurred between January 21, 2020 and June 30, 2020 that are allowable under Notice CPD 21-08 but not under 24 CFR Part 576, HUD waived the HMIS participation requirement for the first 60 days of a project’s operation, as stated in section III.F.5 of Notice CPD-21- 	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><input type="checkbox"/></td> <td style="width: 33%;"><input type="checkbox"/></td> <td style="width: 33%;"><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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08. <ul style="list-style-type: none"> • The recipient and its subrecipients must be able to provide documentation, such as monitoring letters or HMIS or comparable database reports, that document that subrecipient client-level and activity-level data are being entered into the applicable CoC's HMIS (or a comparable database). <p>[24 CFR 576.400(f); 24 CFR 576.500(n)]</p>	
Describe Basis for Conclusion:	

39.

<p><u>Eligible costs (HMIS Lead):</u> Did the recipient use ESG funds to pay the HMIS Lead costs listed at 24 CFR 576.107(a)(2) only with respect to an HMIS for which the recipient was identified as the HMIS Lead by the CoC or, if the recipient was not the HMIS Lead, only with respect to HMIS costs the recipient can demonstrate were necessary help the geographic area prevent, prepare for, and respond to coronavirus among people experiencing homelessness, at risk of homeless, or receiving homeless assistance?</p> <p>NOTE: Section III.E.4.h of Notice CPD-21-0 allows ESG-CV funds to be used to pay costs under 24 CFR 576.107(a)(2) where the recipient is not the HMIS Lead, but only to the extent they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. The waiver also allows the costs to be paid either directly or, if the HMIS Lead is an eligible subrecipient, by sub-granting to the HMIS Lead.</p> <p>[24 CFR 576.107(a)(2); Section III.E.4.h of Notice CPD-21-08]</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

40.

<p><u>Eligible costs (HMIS):</u> If the recipient used ESG funds for HMIS costs that did not pertain to ESG program participants or ESG activities, can the recipient demonstrate those costs were necessary to help the geographic area prevent, prepare for, and respond to coronavirus among people experiencing homelessness, at risk of homeless, or receiving homeless assistance?</p> <p>NOTE:</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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Under section III.E.4.h of Notice CPD-21-08, ESG funds may be used for HMIS costs that fall within the cost categories listed under 24 CFR 576.107 but not are related to collecting data on ESG program participants and ESG Program activities, provided those costs are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. [24 CFR 576.107(a); Section III.E.4.h of Notice CPD-21-08]	
Describe Basis for Conclusion:	

41.

<u>Reporting:</u> Did the recipient submit quarterly reports to HUD regarding their ESG-CV grant, including data on program participants served, expenditure information, and narratives on unique CARES Act activities, within 30 days after the close of each quarter? [Section III.G.1 of CPD Notice-21-08]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

E. OTHER ESG-SPECIFIC REQUIREMENTS

42.

<u>Confidentiality:</u> Did the recipient develop and implement written procedures to ensure the security, privacy, and confidentiality of records as required in 24 CFR 576.500(x), including: <ul style="list-style-type: none"> a. that all records containing personally identifying information of any individual or family who applies for and/or receives ESG assistance must be kept secure and confidential; b. that the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG must not be made public, except with the written authorization of the person responsible for operation of that shelter; and c. that the address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality? [24 CFR 576.500(x)]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

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43.

<p>Did the recipient or subrecipient provide notification to participants of their VAWA rights when an individual or family was denied ESG rental assistance?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>NOTES:</p> <ul style="list-style-type: none"> Only recipients or subrecipients that are responsible for determining eligibility or administering ESG rental assistance are required to provide this Notice. If the denial occurred before OMB’s approval of HUD’s Notice of Occupancy Rights under the Violence Against Women Act, monitors should issue a concern rather than a finding when this question is answered “no,” because HUD cannot require the use of the Notice before it receives OMB approval in accordance with the Paperwork Reduction Act. <p>[24 CFR 576.409(c)(1)]</p>	
<p>Describe Basis for Conclusion:</p>	

44.

<p>Did the recipient or subrecipient provide written notification to participants of their VAWA rights when an individual or family's application for a unit receiving project-based rental assistance was denied?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>NOTE: If the denial occurred before OMB’s approval of HUD’s Notice of Occupancy Rights under the Violence Against Women Act, monitors should issue a concern rather than a finding when this question is answered “no,” because HUD cannot require the use of the Notice before it receives OMB approval in accordance with the Paperwork Reduction Act.</p> <p>[24 CFR 576.409(c)(2)]</p>	
<p>Describe Basis for Conclusion:</p>	

45.

<p>Did the recipient or subrecipient provide notification to participants of their VAWA rights when program participants began receiving ESG rental assistance?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>NOTE:</p>	

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<p>If the program participant began receiving ESG rental assistance before OMB’s approval of HUD’s Notice of Occupancy Rights under the Violence Against Women Act, monitors should issue a concern rather than a finding when this question is answered “no,” because HUD cannot require the use of the Notice before it receives OMB approval in accordance with the Paperwork Reduction Act.</p> <p>[24 CFR 576.409(c)(3)]</p>	
<p>Describe Basis for Conclusion:</p>	

46.

<p>Did the recipient or subrecipient provide notification to participants of their VAWA rights when an individual or family was notified of termination of ESG rental assistance?</p> <p>NOTE: If the notification of termination was made before OMB’s approval of HUD’s Notice of Occupancy Rights under the Violence Against Women Act, monitors should issue a concern rather than a finding when this question is answered “no,” because HUD cannot require the use of the Notice before it receives OMB approval in accordance with the Paperwork Reduction Act.</p> <p>[24 CFR 576.409(c)(4)]</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A </p>
<p>Describe Basis for Conclusion:</p>	

47.

<p>Did the recipient or subrecipient provide notification to participants of their VAWA rights when participants received notification of eviction?</p> <p>NOTE: If the notification of termination was made before OMB’s approval of HUD’s Notice of Occupancy Rights under the Violence Against Women Act, monitors should issue a concern rather than a finding when this question is answered “no,” because HUD cannot require the use of the Notice before it receives OMB approval in accordance with the Paperwork Reduction Act.</p> <p>[24 CFR 576.409(c)(5)]</p>	<p style="text-align: center;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A </p>
<p>Describe Basis for Conclusion:</p>	

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48.

If the recipient is a metropolitan city or urban county, did the recipient develop an emergency transfer plan for victims of domestic violence, dating violence, sexual or stalking?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
NOTE: Because the recipient is not required to adopt or adapt HUD’s model emergency transfer plan when developing the required emergency transfer plan, the monitor should make a finding if an emergency transfer plan was not developed as required by 24 CFR 576.409(d), even in absence of OMB approval of HUD’s approval of the model emergency transfer plan. This note also applies to the other emergency transfer plan questions below.	
[24 CFR 576.409(d)(1)]	
Describe Basis for Conclusion:	

49.

If the recipient is a state, did the recipient establish an emergency transfer plan or require its subrecipients to develop an emergency transfer plan for victims of domestic violence, dating violence, sexual or stalking?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[24 CFR 576.409(d)(1)]	
Describe Basis for Conclusion:	

50.

In the case where the state required subrecipients to develop an emergency transfer plan, did the state specify whether the emergency transfer plan is to be developed for the state as a whole, each area within the state that is covered by a CoC, or for each subrecipient that administers ESG rental assistance?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
[24 CFR 576.409(d)(1)]	
Describe Basis for Conclusion:	

51.

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Does the emergency transfer plan meet the requirements in 24 CFR 5.2005(e) and include the following program requirements:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
a. For families living in units receiving project-based rental assistance (assisted units), the required policies must provide that if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.			
b. For families receiving tenant-based rental assistance, the required policies must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to make an emergency transfer.			
[2 CFR 5.2005(e); 24 CFR 576.409(d)(3)]			
Describe Basis for Conclusion:			

52.

<u>Terminating Assistance</u> : Did the recipient establish a formal process, or ensure its subrecipients established a formal process, for terminating assistance that recognizes the rights of individual being terminated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
[24 CFR 576.402]			
Describe Basis for Conclusion:			

53.

<u>Homeless Participation (Local Governments/Territories)</u> : Do the recipient's records document that the recipient either:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
a. provided for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive ESG funding, or			
b. developed and implemented a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under ESG, and included that plan in the jurisdiction's annual action plan?			
NOTE:			

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It is not acceptable for the plan to simply pass the requirement down to subrecipients. There must be participation at the recipient level. [24 CFR 576.405(a); 24 CFR 576.405(b); 24 CFR 576.500(q)]	
Describe Basis for Conclusion:	

54.

<p>Homeless Participation: Did the recipient involve homeless individuals and families, to the maximum extent practicable:</p> <p>a. in constructing, renovating, maintaining, and operating facilities assisted under ESG;</p> <p>b. in providing services assisted under ESG; and</p> <p>c. in providing services for occupants of facilities assisted under ESG?</p> <p>NOTE: This involvement may include employment or volunteer services.</p> <p>[24 CFR 576.405(c); 24 CFR 576.500(q)]</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

55.

<p>Training Costs: If ESG-CV funds were used for training costs that were not paid for with administrative or HMIS funds and did not involve trainings provided to program participants as part of an eligible activity (e.g. life skills training), were those training costs limited to training on infectious disease prevention and mitigation for homeless service provider staff (including those who do not receive funding through the CARES Act) who were working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness?</p> <p>NOTE: Training costs on infectious disease prevention and mitigation for homeless assistance providers, including those who do not receive funding through the CARES Act, are eligible as a standalone activity and are not to be charged to an activity under 24 CFR 576.101 to 24 CFR 576.109. However,</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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due to Integrated Disbursement and Information System (IDIS) functionality limitations, recipients were instructed to budget these training costs under the Street Outreach activity for funding and drawdown purposes. [Section III.E.3.b of Notice CPD 21-08]	
Describe Basis for Conclusion:	

56.

<p>Training Costs: If any staff time was spent on training of homeless service provider staff other than training on infectious disease prevention and mitigation:</p> <p>a. was it only for providing training on ESG requirements, attending HUD-sponsored ESG training, training staff on using HMIS or a comparable database, or attending HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act; and</p> <p>b. was it charged to the appropriate component (only HMIS for HMIS-related training, and Administrative costs for all other training)?</p> <p>NOTE: Monitors should also consider using the cost allowability exhibit in chapter 34 to assess whether this staff time was charged to the grant in accordance with the applicable cost principles in 2 CFR part 200, especially if the training was provided to homeless service provider staff or contractors that do not work on ESG activities.</p> <p>[24 CFR 576.108(a)(2); 24 CFR 576.107(a)(1)(vii)(F); 24 CFR 576.107(a)(1)(viii)]</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

F. ADMINISTRATIVE COSTS AND FINANCIAL MANAGEMENT

57.

<p>Expenditure Limit (Administrative Activities): Do the recipient's records show that the total amount that the recipient used for administrative activities did not exceed 10% of the recipient's ESG-CV grant?</p> <p>NOTE:</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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As provided by the CARES Act and section III.E.4.c of Notice CPD-21-08, a recipient may use up to 10 percent of its total ESG-CV grant for administrative costs specified in 24 CFR 576.108. [Section III.E.4.c of Notice CPD-21-08]	
Describe Basis for Conclusion:	

58.

<u>Administrative Costs:</u> If any staff time was spent on Consolidated Plan preparation, was it charged to Administrative activities? [24 CFR 576.108(a)(3); 24 CFR 576.108(a)(4)]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

59.

<u>Sharing Administrative Costs (States):</u> If the recipient is a state, did it share a reasonable amount of funds for administrative costs with its subrecipients that are units of general purpose local government? [24 CFR 576.108(b)(1)]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

60.

<u>Prohibition Against Duplication of Benefits:</u> Did the recipient establish and implement procedures to prevent duplication of benefits with ESG-CV funds? [Section III.F.10 of Notice CPD-21-08]	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

61.

If the recipient or its subrecipients used any of the ESG-CV waivers or alternative requirements HUD provided, did the recipient maintain documentation to show those waivers and alternative requirements were	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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<p>used only with respect to ESG- or ESG-CV-eligible activities the recipient or its subrecipients implemented to prevent, prepare for, and respond to coronavirus, including documentation demonstrating when their particular state or local government began preparing for coronavirus, such as notes on formal planning meetings or calls?</p> <p>[Section III of Notice CPD-21-08 (if the waiver or alternative requirement was provided in Notice CPD-21-08 or CPD-22-06), Section IV of Notice CPD-20-05 (if the waiver or alternative requirement was provided in Notice CPD-20-05)]</p>	
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Describe Basis for Conclusion:

62.

<p>Pre-Award Costs: If the recipient used ESG-CV funds to cover or reimburse costs incurred before the period of performance, was the cost:</p> <ul style="list-style-type: none"> • otherwise allowable under the flexibilities and requirements established for ESG-CV funds; • incurred by a recipient or subrecipient to prevent, prepare for, or respond to coronavirus; • incurred after the date the recipient’s or subrecipient’s jurisdiction began preparing for coronavirus (as evidenced by documentation such as formal planning meeting notes) but no earlier than January 21, 2020; and • supported with documentation showing that an environmental review, as applicable, was completed and a Request for Release of Funds was approved in accordance with 24 CFR part 58 and section III.F.8 of Notice CPD-21-08 before a commitment to cover or reimburse with ESG funds. <p>[Section III.E.2 of Notice CPD 21-08]</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;">Yes</td> <td style="border: none;">No</td> <td style="border: none;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

63.

<p>Audits: Did the recipient comply with the audit requirements in the Single Audit Act of 1984, as amended, and implementing regulations in 2 CFR part 200, subpart F?</p> <p>NOTE: To answer this question, the monitor should complete the audit questions provided in part K of Exhibit 34-1a.</p> <p>[24 CFR 576.407(c); 2 CFR 200.501]</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;">Yes</td> <td style="border: none;">No</td> <td style="border: none;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

64.

<p>Annual ESG Funds: If the recipient used ESG-CV flexibilities for annual ESG grants, did the recipient:</p> <p>a. identify the specific activities and funding allocated to prevent, prepare</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;">Yes</td> <td style="border: none;">No</td> <td style="border: none;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

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<p>for, or respond to coronavirus in the IDIS activity description before drawing down funds in accordance with the ESG-CV flexibilities;</p> <p>b. report the amount of annual ESG funds expended to prevent, prepare for, and respond to coronavirus in the CAPER by component type for each annual grant;</p> <p>[Section IV.A.1-2 of Notice CPD-21-08 (for ESG-CV flexibilities provided in Notice CPD-21-08), Section V of Notice CPD-21-05 (for ESG-CV flexibilities provided in Notice CPD-21-05), Section VIII of Notice CPD-22-06 (for the waiver of the 24-month limit in 24 CFR 5.105(b)(2) in Notice CPD-22-06)]</p>	
Describe Basis for Conclusion:	

65.

<p>Annual ESG Funds: If the recipient used ESG-CV flexibilities for annual ESG grants, did the recipient develop and implement policies and procedures to assure and document that:</p> <p>a. the ESG-CV flexibilities are used only for activities and costs that are to prevent, prepare for, and respond to coronavirus; and</p> <p>b. the use of annual ESG funds under the ESG-CV flexibilities meets the same conditions that apply to the use of ESG-CV funds under those flexibilities.</p> <p>NOTE: With respect to annual ESG grant funds, the prohibition against conditioning homeless assistance as provided in Section III.F.12 of Notice CPD-21-08 only applies as a condition for using ESG-CV flexibilities in Notice CPD-21-08 and Notice CPD-22-06 and only with respect to expenditures made after August 18, 2021.</p> <p>[Section IV.A.4 of Notice CPD-21-08 (for ESG-CV flexibilities provided in Notice CPD-21-08), Section V of Notice CPD-21-05 (for ESG-CV flexibilities provided in Notice CPD-21-05), Section VIII of Notice CPD-22-06 (for the waiver of the 24-month limit in 24 CFR 5.105(b)(2) in Notice CPD-22-06)]</p>	<table style="width: 100%; text-align: center;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
Describe Basis for Conclusion:							

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66.

<p>Annual ESG Funds: If the recipient used ESG-CV flexibilities for annual ESG grants, did the recipient limit the use of those flexibilities to only FY 2020 and prior fiscal year ESG funds?</p> <p>[Section IV.A of Notice CPD-21-08 (for ESG-CV flexibilities provided in Notice CPD-21-08 and the waiver of 24 CFR 576.105(b)(2) in Notice CPD-22-06), Section V of Notice CPD-21-05 (for ESG-CV flexibilities provided in Notice CPD-21-05), Section VI of Notice CPD-22-06 (for the waiver of the 24-month limit in 24 CFR 5.105(b)(2))]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

67.

<p>Did the recipient update its written ESG policies and recordkeeping procedures to assure compliance with ESG-CV requirements, including CARES Act requirements, HUD’s alternative requirements, and HUD’s limitations on its ESG-CV waivers?</p> <p>[24 CFR 576.500(a)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

68.

<p>Did each shelter or service provider reviewed maintain written policies and procedures ensuring equal access is provided to individuals in accordance with the individual’s gender identity, and in a manner that affords equal access to the individual’s family?</p> <p>NOTE: Equal access ensures that, when consideration of sex is prohibited or not relevant, individuals will not be discriminated against based on actual or perceived gender identity, and where legitimate consideration of sex or gender is appropriate, such as in a facility providing temporary, short term shelter that is not covered by the Fair Housing Act, and which is legally permitted to operate as a single-sex facility, the individual’s own self-identified gender identity will govern.</p> <p>[24 CFR 5.106(b) and 5.106(d)]</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No
<p>Describe Basis for Conclusion:</p>	

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69.

<p>Did each shelter or service provider reviewed maintain written policies and procedures ensuring that individuals are placed, served, and accommodated in accordance with their gender identity and are not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity?</p> <p>NOTES:</p> <ul style="list-style-type: none">• Examples of asking a client to provide evidence would be asking to provide evidence about someone's physical anatomy, medical records, or identification documents that record their gender identity.• Examples of unnecessary, intrusive questioning would be asking about surgeries or other medical treatment, physical anatomy, and any other topics that are not necessary for placing and serving a client in the facility. <p>[24 CFR 5.106(b)(3) and 5.106(d)]</p>	<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/></p> <p style="text-align: center;">Yes No</p>
<p>Describe Basis for Conclusion:</p>	