

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

6509.2 REV-7 CHG 4

Guide for Review of ESG Subrecipient Grant Management of ESG-CV			
Name of Recipient:			
Name of 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 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 subrecipient 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

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responding to coronavirus. A recipient may have expended annual ESG funds both for activities 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 subrecipient staff interviews to answer the questions below. The Exhibit is divided into eight sections: Subgrants Management and Oversight; Systems Coordination Requirements; Recordkeeping; Homeless Management Information System (HMIS); Other ESG-Specific Requirements; Additional 2 CFR 200 Review for Sub-Subawards; Violence Against Women Act; and Equal Access Rule.

This Exhibit can be used to either monitor a single subrecipient or 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. SUBGRANTS MANAGEMENT AND OVERSIGHT

1.

<u>Eligible Subrecipients (of States, excluding the Commonwealth of Puerto Rico):</u> If the organization is a subrecipient of a state (excluding the Commonwealth of Puerto Rico), is it a local government (as defined in Section I.B.1.c of Notice CPD-21-08); a private nonprofit organization, public housing agency, local redevelopment authority, Indian tribe, or tribally designated housing entity? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.1 Notice CPD-21-08]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

2.

<u>Eligible Subrecipients (of the Commonwealth of Puerto Rico):</u> If the organization is a subrecipient of the Commonwealth of Puerto Rico, is it one of the eligible organizations identified in question 1 above or an instrumentality of the Commonwealth? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.1 Notice CPD-21-08]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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Describe Basis for Conclusion:

3.

<u>Eligible Subrecipients (of the Commonwealth of Puerto Rico):</u> If a subrecipient is an instrumentality of the Commonwealth of Puerto Rico, does the instrumentality have the legal authority and capacity to carry out ESG activities? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.1.d Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion:	

4.

<u>Eligible Subrecipients (of the Commonwealth of Puerto Rico):</u> If an instrumentality of the Commonwealth is acting as the recipient, has the recipient refrained from subawarding funds to an instrumentality of the same government? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.3 of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion:	

5.

<u>Eligible Subrecipients (of Urban Counties):</u> If the organization is a subrecipient of an urban county, is it a member government of the urban county, a private nonprofit organization, a public housing agency, a local redevelopment authority, Indian tribe, or tribally designated housing entity? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.2.a of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion:	

6.

<u>Eligible Subrecipients (of Metropolitan Cities):</u> If the organization is a subrecipient of a metropolitan city, is it a private nonprofit organization, a public housing agency, a local redevelopment authority, Indian tribe, or tribally designated housing entity? [24 CFR 576.2; 24 CFR 576.202; and Section III.A.2.a of Notice CPD-21-	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
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Describe Basis for Conclusion:	

7.

<u>Eligible Subrecipients (of Territories)</u> : If the organization is a subrecipient of a territory, is it a private nonprofit organization, instrumentality, or municipality?	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
[24 CFR 576.2; 24 CFR 576.202; and Section III.A.2.b of Notice CPD-21-08]	
Describe Basis for Conclusion:	

8.

<u>Eligible Subrecipients (of Territories)</u> : If an instrumentality of a territory is acting as the recipient, did the recipient refrain from subawarding funds to an instrumentality of the same government?	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
[24 CFR 576.2; 24 CFR 576.202; and Section III.A.3 of Notice CPD-21-08]	
Describe Basis for Conclusion:	

9.

<u>Payments to Subrecipients (Units of General Purpose Local Government)</u> : If the subrecipient is a unit of general purpose local government, did it pay each of its subrecipients for allowable costs within 30 days after receiving the subrecipient's complete payment request?	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
[24 CFR 576.203(c)]	
Describe Basis for Conclusion:	

10.

<u>Prohibition Against Duplication of Benefits</u> : Did the subrecipient comply with the recipient's established procedures to prevent duplication of benefits with ESG-CV funds?	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
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[Section III.F.10 of Notice CPD-21-08; 24 CFR 576.500(a); 2 CFR 200.403]	
Describe Basis for Conclusion:	

11.

<p>Pre-Award Costs: If the subrecipient 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 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>[Sections III.E.2 and III.F.8 of Notice CPD 21-08; 24 CFR 576.500(a); 2 CFR 200.403]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
Describe Basis for Conclusion:	

12.

<p>Audits: Did the subrecipient 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>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
Describe Basis for Conclusion:	

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B. SYSTEMS COORDINATION REQUIREMENTS

13.

<p>Use of the Coordinated Assessment System: Do the subrecipient's records show the subrecipient's adherence to the following HUD requirements, except as otherwise provided by the program rule and HUD's waivers and alternative requirements?</p> <ul style="list-style-type: none"> that the subrecipient (unless it is a victim service provider) uses the local CoC's coordinated assessment system; and that all initial evaluations were conducted in accordance with the coordinated assessment system requirements? <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) for the first 60 days of the project's operation, as provided by Notice CPD-21-08, Section III.F.5. <p>[24 CFR 576.400(d); 24 CFR 576.401(a); 24 CFR 576.500(a) and (g)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold; font-size: small;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

14.

<p>Coordinated Assessment (Consistency with Written Standards): Did each subrecipient work with the CoC to ensure that the screening, assessment, and referral of program participants through the CoC's coordinated assessment system are consistent with the ESG written standards required under 24 CFR 576.400(e) including with respect 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?</p> <p>NOTE: Please note the clarification provided in the NOTES above for Question 3 "Use of the Coordinated Assessment System."</p> <p>[24 CFR 576.400(d)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold; font-size: small;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

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15.

<p><u>Establishing Written Standards (State Subrecipients):</u> If a subrecipient of a state is required to establish its own written standards, did the subrecipient follow the state recipient's requirements for the establishment and implementation of these standards, 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) for the first 60 days of the project's operation, as provided by Notice CPD-21-08, Section III.F.5.</p> <p>[24 CFR 576.400(e); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

16.

<p><u>Written Standards (Content):</u> If a subrecipient of a state is required to establish its own written standards, did the written standards include:</p> <p>a. the minimum required elements described in 24 CFR 576.400(e)(3); and</p> <p>b. updates 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)(3); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

C. RECORDKEEPING

17.

<p><u>Recordkeeping (Subrecipients):</u> If applicable, did the subrecipient retain copies of all solicitations of and agreements with its subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients?</p> <p>[24 CFR 576.500(a) and (v)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

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18.

<p>Recordkeeping (Eligibility): Does each subrecipient's records document that staff followed the recipient's policies and procedures to:</p> <ul style="list-style-type: none"> a. conduct an initial evaluation and re-evaluations as required, and b. document eligibility in accordance with HUD's requirements? <p>NOTES:</p> <ul style="list-style-type: none"> • In addition to the waiver mentioned in the note to question 11 above, Notices CPD-20-08 (September 1, 2020) and CPD-21-08 (July 17, 2021) included the following alternative requirements: <ul style="list-style-type: none"> ○ an individual may qualify as 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; ○ 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; ○ 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; ○ 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. • The CARES Act incorporated the FY2020 Appropriation Act's conditions on ESG funding which provides 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 eligibility under 42 U.S.C. 11302(a) or (b) 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 <p>[24 CFR 576.400(e)(3); 24 CFR 576.401(a), (b), and (c); 24 CFR 576.500(a), (b), (c), and (e)]</p>	<div style="display: flex; justify-content: space-around; margin-bottom: 5px;"> <input style="width: 30px; height: 20px;" type="checkbox"/> <input style="width: 30px; height: 20px;" type="checkbox"/> <input style="width: 30px; height: 20px;" type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold; font-size: small;"> Yes No N/A </div>
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Describe Basis for Conclusion:

19.

Recordkeeping (Program Participant Records): Did each subrecipient ensure that each program participant record documented compliance with applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at 24 CFR 576.101 through 24 CFR 576.106, except as otherwise provided in Notice CPD-21-05, Notice CPD-21-08, and Notice CPD-22-06?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
[24 CFR 576.500(a) and (f); Section III.E of Notice CPD-21-08]			
Describe Basis for Conclusion:			

20.

Confidentiality: Did each subrecipient have written procedures to ensure confidentiality, including: 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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
[24 CFR 576.500(a) and (x)]			
Describe Basis for Conclusion:			

21.

Recordkeeping (Record Retention): Has the subrecipient developed and implemented policies or complied with recipient record retention 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: 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	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
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<p>funds were first obligated for the major rehabilitation or conversion of the building; or</p> <p>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(a) and (y)]</p>	
<p>Describe Basis for Conclusion:</p>	

D. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

22.

<p><u>Data Collection and Recordkeeping:</u> Can the subrecipient demonstrate that data on <u>all</u> persons it served under the grant, including under all eligible ESG-CV activities, as well as project-level data for all ESG-CV activities for which it was funded 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:</p> <ul style="list-style-type: none"> 24 CFR 576.400(f) allows victim service providers and legal services providers to use a comparable database instead of 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. Each subrecipient must be able to provide documentation, such as HMIS or comparable database reports, that document subrecipient client-level and activity-level data are being entered into the applicable CoC's HMIS (or a comparable database). 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 requirement to participate in HMIS for the first 60 days of the project's operation, as stated in Section III.F.5 of Notice CPD-21-08. <p>[24 CFR 576.400(f); 24 CFR 576.500(a) and (n)]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; width: 33.33%;"><input type="checkbox"/></td> <td style="text-align: center; width: 33.33%;"><input type="checkbox"/></td> <td style="text-align: center; width: 33.33%;"><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					
<p>Describe Basis for Conclusion:</p>							

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23.

<u>Eligible costs (HMIS):</u> If the subrecipient is not a victim service provider, or a legal service provider that uses a comparable database, did the subrecipient use ESG funds only for: a. costs eligible for the purpose of contributing data to the HMIS designated by the CoC; or b. if the subrecipient is the HMIS Lead designated by the CoC, HMIS Lead costs listed at 24 CFR 576.107(a)(2) that are necessary to help the geographic area prevent, prepare for, and respond to coronavirus? [24 CFR 576.107(a)(1); Section III.E.4.h of Notice CPD-21-08; 2 CFR 200.403]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

24.

<u>Data entry (Comparable database):</u> If the subrecipient is a victim service provider or a legal services provider that uses a comparable database, were data on all persons served and all activities assisted under the subaward maintained in a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data, and was information entered into the comparable database prohibited from being entered into an HMIS? [24 CFR 576.400(f); 24 CFR 576.500(a)]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

25.

<u>Eligible costs (Comparable database):</u> If the subrecipient is a victim service provider or a legal services provider that uses a comparable database, were the funds it used for HMIS costs limited to the costs of establishing and/or operating a comparable database that complies with HUD's HMIS requirements, including collecting client-level data over time (i.e., longitudinal data) and generating unduplicated aggregate reports? [24 CFR 576.107(a)(3); 24 CFR 576.107(b); 2 CFR 200.403]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

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26.

<p>Eligible costs (HMIS): If the subrecipient used ESG funds for HMIS costs that did not pertain to ESG program participants or ESG activities, can the subrecipient demonstrate those costs were necessary to help the geographic area prevent, prepare for, and respond to coronavirus among people experiencing homelessness, at risk of homelessness, or receiving homeless assistance?</p> <p>NOTE: 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.</p> <p>[24 CFR 576.107(a); Section III.E.4.h of Notice CPD-21-08; 2 CFR 200.403]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

E. OTHER ESG-SPECIFIC REQUIREMENTS

27.

<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 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, 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.</p> <p>[Section III.E.3.b of Notice CPD 21-08; 2 CFR 200.403]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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Describe Basis for Conclusion:

28.

<p>Training Costs: If any staff time was spent on training of homeless service providers other than training on infectious disease prevention and mitigation:</p> <ul style="list-style-type: none"> 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 b. was it charged to the appropriate component (only HMIS for HMIS-related training, and Administrative costs for all other training)? <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); 2 CFR 200.403]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
Describe Basis for Conclusion:	

29.

<p>Homeless Participation: Did each subrecipient involve homeless individuals and families, to the maximum extent practicable, in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and 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(a)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
Describe Basis for Conclusion:	

F. ADDITIONAL 2 CFR PART 200 REVIEW FOR SUB-SUBAWARDS

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NOTE: The questions in this section F apply when a subrecipient carries out its subgrant by making subgrants **to a lower tier** of subrecipients. To ensure clarity and consistency with part 200, the term “pass-through entity” refers to the first or higher-tier subrecipient, and the term “subrecipient” refers to the subrecipient(s) at the lower tier.

30.

<p>If the pass-through entity 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?</p> <p>[24 CFR 576.407(c); 2 CFR 200.331 (or 2 CFR 200.330 as in effect before November 12, 2020); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p> 	

31.

<p>In making an award to a subrecipient, has the pass-through entity 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?</p> <p>NOTE: This evaluation may include consideration of factors such as:</p> <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. <p>[24 CFR 576.407(c); 2 CFR 200.332(b) (or 2 CFR 200.331(b) as in effect before November 12, 2020); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p> 	

32.

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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); 2 CFR 200.332(a) (or 2 CFR 200.331(a) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
a. Subrecipient name (which must match the name associated with the unique entity identifier)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
b. Subrecipient's unique entity identifier?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
c. Federal Award Identification Number (FAIN)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
d. Federal Award Date, (the date that HUD signed the award to the recipient)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
e. Subaward period of performance start and end date?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
f. Total amount of the Federal award committed to the subrecipient by the pass-through entity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
g. Amount of Federal funds obligated by this action by the pass-through entity to the subrecipient?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
h. Total amount of Federal funds obligated to the subrecipient by the pass-through entity, including the current obligation?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
i. Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
j. HUD's name, the name of the pass-through entity, and contact information for the awarding official of the pass-through entity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> 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"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> 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 pass-through entity and the subrecipient (in compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in §200.414(f))?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

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<p>m. All requirements imposed by the pass-through entity 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 the subaward includes applicable ESG-CV requirements, such as:</p> <ul style="list-style-type: none"> CARES Act prohibition on prerequisite activities; Duplication of Benefits requirements; Allowing 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"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>n. Any additional requirements imposed by the pass-through entity on the subrecipient in order for the pass-through entity to meet its own obligations under the ESG program, including identification of any required financial or performance reports?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>o. A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet its requirements under 2 CFR part 200?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>p. Appropriate terms and conditions concerning closeout of the subaward?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

33.

<p>a. For subawards provided to subrecipients, has the pass-through entity 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); 2 CFR 200.332(d) (or 2 CFR 200.331(d) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	
<p>b. Did the pass-through entity's monitoring of the subrecipient include:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

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<ul style="list-style-type: none"> Reviewing financial and performance reports required by the recipient? <p>[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); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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? <p>[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); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<ul style="list-style-type: none"> Issuing a management decision for audit findings pertaining to the subaward as required by 2 CFR 200.521? <p>[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); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<ul style="list-style-type: none"> Resolving audit findings specifically related to the award? <p>[24 CFR 576.407(c) and 2 CFR 200.332(d)(4); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

34.

<p>a. For each subrecipient, has the pass-through entity determined whether the subrecipient met or is expected to meet the audit threshold set in 2 CFR 200.501?</p> <p>[24 CFR 576.407(c); 2 CFR 200.332(f) (or 2 CFR 200.331(f) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	
<p>b. If a subrecipient met or is expected to meet the audit threshold in 2 CFR 200.501, did the pass-through entity verify that the subrecipient was audited (or will be audited) as required by Subpart F of 2 CFR part 200?</p> <p>[24 CFR 576.407(c); 2 CFR 200.332(f) (or 2 CFR 200.331(f) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

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35.

<p>Can the pass-through entity 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 pass-through entity's own records?</p> <p>[24 CFR 576.407(c); 2 CFR 200.332(g) (or 2 CFR 200.331(g) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

36.

<p>If the pass-through entity found any subrecipient noncompliant, did pass-through take appropriate action in accordance with the terms of the subaward and the pass-through entity's agreement with the recipient?</p> <p>[24 CFR 576.407(c); 2 CFR 200.332(h) (or 2 CFR 200.331(h) as in effect before Nov. 12, 2020); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

G. VIOLENCE AGAINST WOMEN ACT

37.

<p>If the subrecipient is a subrecipient of a State ESG recipient and the state required the subrecipient to develop an emergency transfer plan, does the subrecipient have an emergency transfer plan for victims of domestic violence, dating violence, sexual assault, or stalking?</p> <p>[24 CFR 576.409(d)(1); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

38.

<p>If the subrecipient administers ESG rental assistance, did it implement the applicable emergency transfer plan that was developed in accordance with 24 CFR 576.409(d)?</p> <p>[24 CFR 576.409(d)(2); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

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39.

<p>If the subrecipient was required to develop the emergency transfer plan, does that plan meet the requirements in 24 CFR 5.2005(e) and include the following program requirements:</p> <ul style="list-style-type: none">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 affect an emergency transfer. <p>[24 CFR 576.409(d)(3); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
<p>Describe Basis for Conclusion:</p>	

H. EQUAL ACCESS RULE

40.

<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); 24 CFR 576.500(a)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div></div>
<p>Describe Basis for Conclusion:</p>	

41.

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<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>NOTE:</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)(2), 5.106(b)(3) and 5.106(d); 24 CFR 576.500(a)]</p>	<div style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</div>
<p>Describe Basis for Conclusion:</p>	