

Exhibit 17-2 6509.2 REV-7 CHG-2
 Community Compass Technical Assistance and Capacity Building Program

Guide for Review of Community Compass TA Program Subrecipient Management			
Name of Recipient:			
Name of Subrecipient (if applicable):			
Award Numbers Reviewed:			
Staff Consulted:			
Name(s) of Reviewer(s):		Date:	

NOTE: Most questions that address requirements contain the citation for the source of the requirement (statute, regulation, Federal Register notice/NOFA, or cooperative agreement). However, in some instances, a controlling document (i.e., cooperative agreement or Federal Register Notice/NOFA) is provided without a specific citation. This is because requirements can vary significantly by award, causing the applicable cooperative agreements and published Notices/NOFA to vary accordingly. If requirements are not satisfied in these instances, HUD should ensure that citations to the source of the requirement are appropriately noted in the section identified as “Describe Basis for Conclusion.” In addition, certain requirements may only apply to certain award recipients; carefully review the citation to determine its applicability. If a requirement is not met, HUD must select “NO” in response to the question and make a finding of noncompliance. Other questions may not address requirements, but are included to assist the reviewer in understanding the recipient’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: HUD reviewers should use this Exhibit to determine recipient’s compliance with managing and monitoring performance of subrecipients, including contractors and consultants, as described in 24 CFR parts 84 and 85 (2013 edition) for awards issued before December 26, 2014, or in 2 CFR part 200 for awards issued on or after December 26, 2014. See 2 CFR 200.93 for definitions of “subrecipient.” The regulations at 2 CFR 200.328, and legacy regulation 24 CFR 84.40 and 85.40, require recipients to monitor the day-to-day operations of subrecipient activities for compliance with applicable Federal requirements as well as to assess performance. Note that the terminology used to reference the entities receiving the Federal awards mirrors the language in 2 CFR part 200 and uses “recipient” to mean the entity that directly received the Federal funds, e.g., program participant or grantee, and “subrecipient” to mean the entity that receives funds through a pass-through entity (see 2 CFR parts 200.74, 200.86, and 200.93). Where the question pertains to both a recipient and a subrecipient, the term “non-Federal entity” is used. Award recipients monitoring must cover each award, work plan, or activity. HUD’s review normally takes place at the recipient level but, if time and resources permit, a selected sample of subrecipients should be monitored. This Exhibit is divided into five sections: General Questions; Internal Controls; Review of Subrecipient Written Agreements; Reporting; and HUD Review of Subrecipients.

A. GENERAL QUESTIONS:

FOR AWARDS SUBJECT TO 24 CFR PART 84 AND 24 CFR PART 85

1.

Does the recipient have policies and procedures for oversight of subrecipients? If so, provide a brief summary of the policies and procedures. Also, attach a copy of the policies and procedures, if practical. [2 CFR 84.51; 2 CFR 85.40]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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Describe Basis for Conclusion:

2.

For the period covered by the monitoring event, how many subrecipients were provided TA funds?

Describe Basis for Conclusion:

3.

a. What is the total amount of TA funds that the recipient budgeted for, obligated to, and remains unexpended for subrecipients covered by the monitoring review period?

Describe Basis for Conclusion:

b. Is there any indication that activities carried out by subrecipients adversely affect the recipient’s timeliness in carrying out the TA program?

Yes No N/A

Describe Basis for Conclusion:

c. If yes, what are the causes for the delay (i.e., significant amounts of funding for individual activities are slow-moving)?

Yes No N/A

Describe Basis for Conclusion:

4.

a. How does the recipient ensure that subrecipients understand how to apply and meet the TA program requirements to the activities that they are carrying?

Yes No N/A

Describe Basis for Conclusion:

b. Is there evidence that the recipient has provided appropriate resource materials to subrecipient (e.g., governing regulations, provisions, TA guidance, or corresponding website links) and keeps subrecipients abreast of program changes and new or revised requirements?

Yes No N/A

Describe Basis for Conclusion:

5.

a. Does the recipient provide technical assistance or training to subrecipients on an on-going and/or an as-needed basis?

Yes No N/A

Describe Basis for Conclusion:

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b. If yes, describe the technical assistance or training the recipient has provided during the most recently completed program year and complete the table. If applicable and appropriate, attach training materials, brochures, attendance lists, etc.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:			
Subrecipient	# of ppl trained	Topics	Training Date
Describe Basis for Conclusion:			

6.

a. Does the recipient have a signed and dated subrecipient agreement with each subrecipient?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

b. If yes, if the subrecipient agreement compliant with program and Federal requirements?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

B. INTERNAL CONTROLS:

7.

a. Does the recipient have a method to ensure that the financial management systems of subrecipients are kept in accordance with Federal requirements? [24 CFR 85.20(b) or 24 CFR 84.21(b)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

b. Has the recipient established qualifications for its employees, auditors, or other personnel who conduct financial reviews of subrecipients?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

8.

a. Do staff of the subrecipient employees work on multiple TA awards and other Federal awards?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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Describe Basis for Conclusion:

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b. If yes, does the recipient have a system to ensure that its keeps appropriate time distribution records and makes appropriate charges to the TA program? [24 CFR 84.22 or 85.22; OMB Circular A-87; OMB Circular A-122]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

9.

Does the recipient have a process to review each subrecipient for evidence of conflicts of interest, either between the recipient and the subrecipient, or between the subrecipient and its contractors? If yes, the reviewer is suggested to obtain information on the background of subrecipient staff and/or the Board of Directors, and seek assurances from the subrecipient when conducting on-site reviews.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

10.

Does the recipient have a system or other method to ensure subrecipient compliance with the procurement and/or subcontracting of Federal requirements? [24 CFR 85.36 or 24 CFR 84.40-48]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

11.

Does the recipient ensure that subrecipients maintain and retain adequate records, for a period of not less than the number of years in Federal requirements? [24 CFR 85.42 or 84.53(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

12.

a. Does the recipient ensure that subrecipients have procedures to adequately identify TA funded property and assets and maintain the appropriate property records? [24 CFR 85.32(d)(1) or 24 CFR 84.34(f)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

b. Does the recipient ensure that subrecipients have procedures to ensure adequate safeguards for preventing loss, damage or theft of subrecipient-held property funded by the TA program? [24 CFR 85.32(d)(3) or 24 CFR 84.34(f)(4)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

13.

a. Does the recipient have a process for determining whether Federal Single Audits are required for its subrecipients? If yes, describe the process. [OMB Circular A-133]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:		
b. Does the recipient have a system for ensuring that the audits are completed and submitted in accordance with Federal requirements? [24 CFR 84.26 and 24 CFR 85.26]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
c. Does the recipient review the audits to ensure regulatory compliance and follow-up as required under Federal requirements? [OMB Circular A-133, subpart D]		
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

14.

a. Describe the recipient's procedures for monitoring its subrecipients for compliance and performance (on-site or remote).		
Describe Basis for Conclusion:		
b. What factors does the recipient consider in selecting and reviewing subrecipients and their activities on-site (e.g., dollar amount, nature of activity)?		
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
c. Do the procedures and factors considered appear adequate to ensure effective and efficient program management?		
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

C. REVIEW OF SUBRECIPIENT WRITTEN AGREEMENTS

Select a sample of subrecipients and complete this section for each subrecipient reviewed. Attach additional sheets as needed for each subrecipient.

15.

Does the written agreement include the following required elements:		
a. Statement of work and corresponding budget?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
b. Timetable or schedule for performance?		
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

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c. Records and reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
d. Program income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
e. Uniform administrative requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
f. Other program requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
g. Suspension and termination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
16.			
Does the recipient provide sufficient detail for the recipient to monitor performance against the agreement as well as report on performance measurement progress?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
17.			
What does the agreement state related to program income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
18.			
a. Is the recipient paid on a reimbursement basis? [Provisions-Payments]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
b. Does the recipient require the subrecipient to submit support documentation to receive payment of TA funds in sufficient detail for the recipient to determine cost eligibility and allowability? [24 CFR 85.20(b)(5)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

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Describe Basis for Conclusion:		
c. Whether payment is a reimbursement, are the conditions of 2 CFR 200.305(b) met, as applicable? [24 CFR 84.21, 85.20(b)(7)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
Describe Basis for Conclusion:		
d. If the subrecipient is paid on a reimbursement basis, what system of internal controls has the recipient established to ensure that the funds are used for allowable and eligible costs that are related to the funded activity(ies) in accordance with 24 CFR 84.21, 85.20(b)(7)? [24 CFR 84.21, 85.20(b)(7)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

D. REPORTING

19.

a. Does the program participant routinely require its subrecipients to submit reports?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
b. If yes, what reports are required and what is the frequency of submission?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		
c. Are the reports or records submitted to the recipient sufficient to assess subrecipient performance against the specifications in the statement of work?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

20.

Are there other mechanisms used by the recipient to obtain the information required for inclusion in the DRGR or TA Portal report submissions?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

21.

How does the recipient verify report data?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

22.

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Does a comparison of a sample of the recipient's subrecipient records match with information that the recipient entered in DRGR and in the Portal? Are there any discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

E. HUD REVIEW OF SUBRECIPIENTS

Select a sample of subrecipients to review, either on-site or remotely, to determine the effectiveness of the recipient's subrecipient management efforts.

23.

a. Did the recipient monitor this subrecipient on-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
b. If "yes," what was the date of the recipient's monitoring?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
c. If the subrecipient was monitored, were any findings, concerns, or observations identified by the recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

24.

a. Do the costs charged by the subrecipient to the TA award appear reasonable as defined in the regulation? [2 CFR 225; OMB Circular A-87]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			
b. If "no," describe what appears unreasonable and whether further review is warranted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

25.

In interviewing subrecipient staff, does there appear to be adequate knowledge and understanding of TA rules and other applicable regulations so that it is likely that the subrecipient is in compliance with such rules?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

26.

Did you identify any findings or concerns not detected by the recipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

27.

Based on your review, does there appear to be any significant differences between actual performance and the reported performance submitted by the subrecipient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

28.

Based upon the recipient’s oversight of subrecipients as described in this template, does your review lead you to conclude that the recipient is following its own procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

F. SUBRECIPIENT MANAGEMENT

FOR AWARDS SUBJECT TO 2 CFR 200

29.

If the recipient provides funds through either a subrecipient agreement or a contract, has it followed the criteria in 2 CFR 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? [2 CFR 200.330]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

Describe Basis for Conclusion:

30.

In making an award to a subrecipient, has the non-Federal 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? 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 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A

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<ul style="list-style-type: none"> the extent and results of previous HUD monitoring, if the subrecipient also receives funds directly from HUD. <p>[2 CFR 200.331(b)]</p>	
<p>Describe Basis for Conclusion:</p>	

31.

<p>For each subaward provided to a subrecipient, has the non-Federal entity clearly identified it as a subaward to a subrecipient and included the following information at the time of the subaward:</p> <ol style="list-style-type: none"> Federal award identification? Subrecipient name (which must match the name associated with the unique entity identifier)? Subrecipient’s unique entity identifier? HUD award identification number? Federal award date, as defined in 2 CFR 200.39 (the date that HUD signed the award to the recipient)? Subaward period of performance start and end date? Total amount of the Federal Award committed to the subrecipient by the pass-through entity? Amount of Federal funds obligated by this action by the pass-through entity to the subrecipient? Total amount of Federal funds obligated to the subrecipient by the pass-through entity including the current obligation? Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)? HUD’s name, the name of the non-Federal entity, and contact information for the awarding official of the non-Federal entity? Catalog of Federal Domestic Assistance (CFDA) number and name of the HUD program under which the award is made? Identification of whether the award is Research & Development (R&D), if applicable? Indirect cost rate for the HUD award to the recipient? Indirect cost rate for the subaward, if applicable (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))? All requirements imposed by the non-Federal entity on the subrecipient so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the subaward? 	<table border="0"> <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>p. Any additional requirements imposed by the non-Federal entity on the subrecipient in order for the non-Federal entity to meet its own responsibility to HUD, including identification of any required financial or performance reports?</p> <p>q. A requirement that the subrecipient permit the non-Federal entity and auditors to have access to the subrecipient’s records and financial statements as necessary for the non-Federal entity to meet its requirements under 2 CFR part 200?</p> <p>r. Appropriate terms and conditions concerning closeout of the subaward?</p> <p>[2 CFR 200.331(a)]</p>	
Describe Basis for Conclusion:	

32.

<p>a. For subawards provided to subrecipients, has the non-Federal 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>[2 CFR 200.331(d)]</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:							
<p>b. Did the non-Federal entity’s monitoring of the subrecipient include:</p> <ul style="list-style-type: none"> • Reviewing financial and performance reports required by the non-Federal entity? • 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? • Issuing a management decision for audit findings pertaining to the subaward as required by 2 CFR 200.521? <p>[2 CFR 200.331(d)(1) – (3)]</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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33.

a. For each subrecipient provided a subaward, has the non-Federal entity determined whether the subrecipient met or exceeded the audit threshold set in 2 CFR 200.501 for the respective fiscal year? [2 CFR 200.331(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	
b. If a subrecipient meets the audit threshold in 2 CFR 200.501, has the non-Federal entity verified that the subrecipient is audited as required by Subpart F of 2 CFR part 200? [2 CFR 200.331(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

34.

For each subrecipient receiving a subaward, has the non-Federal entity considered whether the results of the subrecipient’s audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the non-Federal entity’s own records? [2 CFR 200.331(g)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

35.

If the non-Federal entity found any subrecipient non-compliant, did the non-Federal entity consider taking enforcement action against the subrecipient per 2 CFR 200.338 and the program regulations? [2 CFR 200.331(h)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

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