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| --- | --- |
| **Guide for Review of Subrecipient Written Agreements and Oversight** | |
| **Name of Participating Jurisdiction (PJ):**Click or tap here to enter text. | |
| **Staff Consulted:**Click or tap here to enter text. | |
| **Name of HUD Reviewer(s):**Click or tap here to enter text. | **Date of Review:**Click or tap here to enter text. |

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement

|  |  |
| --- | --- |
| **File Selection Summary**  **(Required)** | |
| **Program Year(s) Reviewed:** |  |
| **Number of Files Reviewed:** | Click or tap here to enter text. |
| **How were files selected?** | Random  Non-Random  Statistical  Combination (describe):  Click or tap here to enter text. |
| **Were additional files selected for review?** | Yes  No |
| **If additional files were selected for review, why were files added to the monitoring**?  (select all that apply) | Expand the sample to include a file(s) from each staff person working in the respective program area being monitored;  Expand the sample to include additional files with the same characteristics, (i.e., same problem category, staff person, activities or other characteristics)  Expand the sample to determine whether problems are isolated events or represent a systemic problem.  Expand the sample to include files the reviewer has reason to believe may have compliance problems or that are substantially different in terms of size, complexity, or other factors from other projects the PJ has undertaken.  Other, please specify: Click or tap here to enter text. |

**Instructions:**

* This Exhibit is designed to review the PJ’s written agreement with a subrecipient for compliance with HOME regulatory requirements. This Exhibit is also designed to evaluate a PJ’s compliance with HOME requirements for subrecipient management. As specified in [24 CFR 92.504(a)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-504), PJs are responsible for monitoring the day-today operations of subrecipient activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. PJ monitoring must cover each program, function, or activity. The HUD review should begin at the PJ level, and if time and resources permit, a selected sample of subrecipients should be monitored on-site, using the sampling guidance in Section 7-4 of the Chapter introduction.
* Reviewers can use this Exhibit to review up to five subrecipient written agreements. If additional agreements are included in the monitoring, the reviewer should complete another copy of the Exhibit. Section 7-4 in the introduction to this Chapter provides guidance on the number of files to review. Reviewers must complete the File Selection Summary table at the beginning of this Exhibit.
* Reviewers must adequately describe the basis for any findings in the “Describe Basis for Conclusion” section of each question, being careful to note which subrecipient written agreement is noncompliant and why.
* This Exhibit requires the completion of Exhibit 34-1 to answer Question 34.
* This Exhibit is divided into the following seven program areas.
  + A. Subrecipient Written Agreements
  + B. Subrecipient Oversight and Internal Controls
  + C. Reporting
  + D. On-Site Monitoring by the PJ
  + E. Program Income Monitoring
  + F. On-Site Review of Subrecipients by HUD

**For Written Agreement File Reviews**: Include the following information for each file reviewed. When completing the exhibit questions that follow, include only the file number or subrecipient name as a reference to the written agreement file reviewed.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **File#** | **Subrecipient Name** | **HOME Funds**  **Awarded** | **Total HOME**  **Funds Drawn** | **Brief Summary of Tasks Included in Agreement** |
| **1.** | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |
| **2.** | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |
| **3.** | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |
| **4.** | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |
| **5.** | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |

**Questions:**

1. WRITTEN AGREEMENTS

1.

|  |  |  |
| --- | --- | --- |
| Was a written agreement executed by the PJ and the subrecipient with the dated signatures of all parties?  [24 CFR 92.504(b)] | | |
| File #1: | Yes  No | Date of Written Agreement: Click or tap here to enter text. |
| File #2: | Yes  No | Date of Written Agreement: Click or tap here to enter text. |
| File #3: | Yes  No | Date of Written Agreement: Click or tap here to enter text. |
| File #4: | Yes  No | Date of Written Agreement: Click or tap here to enter text. |
| File #5: | Yes  No | Date of Written Agreement: Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

2.

|  |  |
| --- | --- |
| Did the PJ execute the written agreement with the subrecipient before entering the subgrant into the Integrated Disbursement and Information System (IDIS)? (Compare the dated signatures on the written agreement to the “Date Created” on the “View Subgrant” screen in IDIS.)  [24 CFR 92.502(b)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

3.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the written agreement specify the PJ’s policies and procedures for the following requirements with which the subrecipient must comply:  Note: The written agreement **must** only include those requirements that are applicable to the type of activity the subrecipient is undertaking*.*  [24 CFR 92.504(c)(2)] | | | | | |
|  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| 1. Income determinations in accordance with [24 CFR 92.203](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-203)? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Underwriting and subsidy layering guidelines in accordance with   [24 CFR 92.250(b)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-250)? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Rehabilitation standards in accordance with [24 CFR 92.251](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-251)? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Refinancing guidelines in accordance with [24 CFR 92.254(f)(3)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-254)? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Homebuyer program policies in accordance with [24 CFR 92.254(f)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-254)? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Affordability requirements in accordance with [24 CFR 92.252](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-252) (rental) and/or [24 CFR 92.254](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-254) (homebuyer), as applicable? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | |

4.

|  |  |  |
| --- | --- | --- |
| Does the written agreement describe the amount and use of HOME funds for each program or activity the subrecipient will administer, including the type and number of housing projects to be funded?  [24 CFR 92.504(c)(2)(i)] | | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

5.

|  |  |
| --- | --- |
| Does the written agreement describe allowable administrative costs and the terms for payment?  [24 CFR 92.504(c)(2)(i) and 92.207] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

6.

|  |  |
| --- | --- |
| Does the written agreement describe or list the tasks to be completed in sufficient detail to enable the PJ to effectively monitor performance under the agreement?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

7.

|  |  |
| --- | --- |
| Is there a schedule for the completion of tasks that contains sufficient detail to enable the PJ to effectively monitor performance under the agreement?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

8.

|  |  |
| --- | --- |
| Does the written agreement include a detailed schedule for the completion of tasks, including a schedule for committing funds to projects in accordance with deadlines established in Part 92, to enable the PJ to effectively monitor performance under the agreement?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

9.

|  |  |
| --- | --- |
| Does the written agreement include a budget that contains sufficient detail to enable the PJ to effectively monitor performance under the agreement?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

10.

|  |  |
| --- | --- |
| Does the written agreement state the requirements for matching contributions, *if any*, in accordance with [24 CFR 92.208](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-208) through [24 CFR 92.222](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-222)?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

11.

|  |  |
| --- | --- |
| Does the written agreement state the duration of the agreement?  [24 CFR 92.504(c)(2)(i)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

12.

|  |  |
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| Does the agreement state if program income is to be remitted to the PJ or retained by the subrecipient to carry out additional eligible activities?  [24 CFR 92.504(c)(2)(ii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

13.

|  |  |
| --- | --- |
| Does the agreement require the subrecipient to comply with applicable uniform administrative requirements, as described in [24 CFR 92.505](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-505)?  [24 CFR 92.504(c)(2)(iii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

14.

|  |  |
| --- | --- |
| Does the agreement require compliance with all federal requirements and nondiscrimination requirements established in [24 CFR 92.350](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1350&rgn=div8)? The agreement may require compliance by reference to [24 CFR 92.350](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1350&rgn=div8). In the absence of specific references, the monitor must consult the regulation to determine that each requirement in [24 CFR 92.350](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1350&rgn=div8) is incorporated into the agreement.  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

15.

|  |  |
| --- | --- |
| *If the HOME funds will be used for housing containing five or more HOME assisted units,* does the agreement specify the subrecipient’s affirmative marketing responsibilities under  [24 CFR 92.351](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-351)?  [24 CFR 92.504(c)(2)(v)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

16.

|  |  |
| --- | --- |
| Does the agreement set forth the requirements the subrecipient must follow to enable the participating jurisdiction to carry out environmental review responsibilities before HOME funds are committed to a project?  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

17.

|  |  |
| --- | --- |
| Does the agreement require compliance with the displacement, relocation and acquisition requirements of [24 CFR 92.353](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1353&rgn=div8) *should a project involve acquisition, demolition, or rehabilitation, or if any tenants or owners will be relocated permanently or temporarily* ?  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

18.

|  |  |
| --- | --- |
| Does the agreement require compliance with the Davis-Bacon labor requirements prescribed in [24 CFR 92.354](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1354&rgn=div8) *should a project contain 12 or more HOME-assisted units*?  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

19.

|  |  |
| --- | --- |
| Does the agreement require compliance with the lead-based paint requirements prescribed in [24 CFR 92.355?](https://www.ecfr.gov/cgi-bin/text-idx?SID=c744ac02a6816223ac4f91aec21bdd6f&mc=true&node=se24.1.92_1355&rgn=div8)  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

20.

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| --- | --- |
| Does the agreement require compliance with the conflict of interest provisions prescribed in [24 CFR 92.356?](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1356&rgn=div8)  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

21.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *If HOME funds are being provided to develop rental housing or provide tenant based rental assistance*, does the agreement set forth all obligations the participating jurisdiction imposes on the subrecipient in order to meet all the Violence Against Women Act (VAWA) requirements in accordance with [24 CFR 92.359](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-359):  [24 CFR 92.504(c)(2)(iv)] | | | | | |
|  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| 1. Notification requirements? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Bifurcation of lease requirements? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Development of VAWA lease or lease addendum? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| 1. Obligations under the emergency transfer plan, including whether the subrecipient must develop its own emergency transfer plan or follow the PJ’s plan? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | |

22.

|  |  |
| --- | --- |
| *For HOME assisted rental housing and TBRA for which the date of the HOME funding commitment is on or after December 16, 2016*, does the written agreement state that VAWA requirements apply to the owner of the housing for the duration of the affordability period for all rental housing, or for TBRA, the period for which the rental assistance contract is given?  [24 CFR 92.504(c)(2)(iv)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

23.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the agreement between the PJ and the subrecipient specify the following:  [24 CFR 92.504(c)(2)(vi)] | | | | | |
|  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| 1. The subrecipient may not request disbursement of HOME funds under this agreement until the funds are needed for payment of eligible HOME costs? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. The amount of each request is limited to the amount needed? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. If funds in the local account and funds in the United States Treasury account are committed to a project, the subrecipient must disburse the funds in the local account before requesting HOME funds in the United States Treasury account for the project? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | |

24.

|  |  |
| --- | --- |
| Does the written agreement specify that upon expiration of the agreement, the subrecipient must transfer to the PJ any HOME funds on hand at the time of expiration and any accounts receivable attributable to the use of HOME funds?  [24 CFR 92.504(c)(2)(vii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

25.

|  |  |
| --- | --- |
| Does the agreement identify specific records that must be maintained?  [24 CFR 92.504(c)(2)(viii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

26.

|  |  |
| --- | --- |
| Does the agreement specify the information or reports that must be submitted in order to assist the PJ in meeting its record keeping and reporting requirements?  [24 CFR 92.504(c)(2)(viii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

27.

|  |  |
| --- | --- |
| Does the agreement specify remedies for breach of the HOME requirements?  [24 CFR 92.504(c)(2)(ix)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

28.

|  |  |
| --- | --- |
| Does the agreement specify that the PJ will follow the requirements for suspension or termination of the agreement, in whole or in part, if the subrecipient materially fails to comply with any term of the agreement?   * *For written agreements executed prior to 12/26/14, cite 24 CFR 85.43(a) (remedies for non-compliance), 24 CFR 85.43(a)(3) termination in whole or in part)* * *For written agreements executed on or after 12/26/14, cite* [*2 CFR 200.338*](https://www.govinfo.gov/app/details/CFR-2018-title2-vol1/CFR-2018-title2-vol1-sec200-338) *(remedies for non-compliance),* [*2 CFR 200.339*](https://www.govinfo.gov/app/details/CFR-2018-title2-vol1/CFR-2018-title2-vol1-sec200-339) *(termination in whole or in part)*   [24 CFR 92.504(c)(2)(ix)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

29.

|  |  |
| --- | --- |
| *If the subrecipient provides funds to for-profit owners or developers, nonprofit owners or developers, subrecipients, homeowners, homebuyers, tenants receiving tenant-based rental assistance, or contractors who are providing services to the subrecipient*, does the subrecipient have a written agreement with such entities, with dated signatures of all parties, before it provided funds, which meets the applicable requirements of [24 CFR 92.504(c)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-504)?  [24 CFR 92.504(b) and (c)(2)(x)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

30.

|  |  |
| --- | --- |
| *If the subrecipient has an agreement with another entity*, does the agreement state if repayment of HOME funds or recaptured funds must be remitted to the PJ or retained by the subrecipient?  [24 CFR 92.504(b) and (c)(2)(x)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

31.

|  |  |
| --- | --- |
| Does the written agreement specify that the subrecipient and any CHDOs are prohibited from charging servicing, origination, or other fees for the cost of administering the HOME program, except nominal application fees to owners and housing counseling fees to homebuyers?  [24 CFR 92.504(c)(2)(xi), 92.214(b)(1)(i] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

1. SUBRECIPIENT OVERSIGHT AND INTERNAL CONTROLS

32.

|  |  |
| --- | --- |
| Does the PJ review the performance of *each* subrecipient annually?  [24 CFR 92.504(a)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

33.

|  |  |
| --- | --- |
| Does the PJ have and follow written policies, procedures and systems to ensure that subrecipients comply with the HOME program requirements applicable to them and to the projects they are carrying out?  [24 CFR 92.504(a)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

34.

|  |  |
| --- | --- |
| Does the PJ have and follow written procedures and systems for assessing risk of activities and projects and monitoring subrecipients’ compliance with the HOME program requirements applicable to them and the projects they are carrying out?  [24 CFR 92.504(a)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

35.

|  |  |
| --- | --- |
| Does the PJ ensure that subrecipients maintain adequate records to comply with program requirements, including record retention?  [24 CFR 92.504(a) and 24 CFR 92.508] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

36.

|  |  |
| --- | --- |
| Before disbursing HOME funds to any entity, does the subrecipient enter into a written agreement with that entity?  [24 CFR 92.504(b)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

37.

|  |  |
| --- | --- |
| Did the subrecipient require a Single Audit in accordance with [2 CFR part 200, Subpart F](https://www.ecfr.gov/cgi-bin/text-idx?SID=c92a1180439e91c819db8c5f87cf1f1f&node=2:1.1.2.2.1.6&rgn=div6)?  If the response is “Yes,” you must complete Exhibit 34-1, Section K.  [24 CFR 92.506] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

1. REPORTING

38.

|  |  |
| --- | --- |
| *If the PJ enters data for IDIS set-up and completion of subrecipient projects*, does it routinely obtain complete and accurate data from subrecipients?  [24 CFR 92.502(b) and (d)] | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

39.

|  |  |
| --- | --- |
| *If the subrecipient enters data for IDIS project set-up and completion*, does the PJ review data to ensure that data are complete, accurate, timely and consistent with subrecipient records?  [24 CFR 92.502(b) and (d)] | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

1. ON-SITE MONITORING BY THE PJ

40.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Provide the following information regarding the on-site monitoring conducted by the PJ during the year(s) being reviewed.  [24 CFR 92.504(a)]  (Use the “tab” key to add additional rows or attach additional sheets.) | | | | |
| **Subrecipient Monitored** | **Dates** | **Number and Types of Finding** | **Date of Letter** | **Date(s) Findings Resolved** |
| Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. | Click or tap here to enter text. |
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41.

|  |  |
| --- | --- |
| When monitoring subrecipients on-site, does the PJ verify the accuracy of data reported in IDIS and in reports that may be required?  [24 CFR 92.504(a)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

42.

|  |  |
| --- | --- |
| Do the PJ’s written monitoring reports clearly document the areas monitored and the conclusions reached?  [24 CFR 92.504(a) and 24 CFR 92.508(a)(6)(iv)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

43.

|  |  |
| --- | --- |
| Does the PJ have policies and procedures (including internal procedures) for ensuring the quality of monitoring that include: documentation and intended actions, follow-through on promised actions, communication of monitoring results to subrecipients, timeliness of communication of results, and how subrecipients may respond to findings?  [24 CFR 92.504(a); 24 CFR 92.505; 2 CFR 200.331] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

44.

|  |  |
| --- | --- |
| Does the PJ’s policy on how monitoring results are communicated to subrecipients include expected corrective actions and dates for resolution?  [24 CFR 92.504(a) and 24 CFR 92.508(a)(6)(iii); 24 CFR 92.505;  2 CFR 200.331] | Yes  No |
| **Describe Basis for Conclusion:** | |

1. PROGRAM INCOME MONITORING

45.

|  |  |
| --- | --- |
| In comparing the PJ’s internal financial records with its IDIS entries, is the PJ accurately reporting program income received by subrecipients in IDIS?  [24 CFR 92.503(a)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

46.

|  |  |
| --- | --- |
| *If program income is retained by the subrecipient*, does the subrecipient disburse program income before requesting HOME funds from the PJ?  [24 CFR 92.504(c)(2)(vi)] | Yes  No  N/A |
| **Describe Basis for Conclusion:** | |

47.

|  |  |
| --- | --- |
| *If program income is retained by the subrecipient*, does the PJ check to determine that program income is used for additional eligible activities?  [24 CFR 92.504(c)(2)(ii)] | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

48.

|  |  |
| --- | --- |
| Has the PJ included program income expected to be received by all subrecipients in preparing its most recent Consolidated Plan?  [24 CFR 91.220(c), 24 CFR 91.320(c) and 24 CFR 91.420(b)] | Yes  No |
| **Describe Basis for Conclusion:** | |

1. ON-SITE REVIEW OF SUBRECIPIENTS BY HUD

NOT REVIEWED DURING MONITORING

Instructions: Conduct an on-site review of the PJ’s subrecipients as a way of determining the effectiveness of the PJ’s monitoring efforts. If the PJ has more than two subrecipients, select a sample of subrecipients for review. Assess the PJ's monitoring reports for the subrecipients selected. Attach additional sheets as necessary to reflect the results of each subrecipients reviewed.

Name of subrecipients:

|  |
| --- |
| Click or tap here to enter text. |

Program or Project:

|  |
| --- |
| Click or tap here to enter text. |

Records/Data Reviewed:

|  |
| --- |
| Click or tap here to enter text. |

Concerns/Findings (identified by PJ):

|  |
| --- |
| Click or tap here to enter text. |

49.

|  |  |
| --- | --- |
| [OS] Did the PJ monitor this subrecipient on-site? If “Yes,” indicate when.  [24 CFR 92.504(a)] | Yes  No |
| Describe Basis for Conclusion:  Click or tap here to enter text. | |

50.

|  |  |
| --- | --- |
| [OS] Is there any non-compliance with HOME program requirements that the PJ’s monitoring report should have identified? (If “Yes,” identify below.)  [24 CFR 92.504(a); 24 CFR 92.505; 2 CFR 200.331] | Yes  No |
| Describe Basis for Conclusion:  Click or tap here to enter text. | |