|  |
| --- |
| **Guide for Review of Overall Management of CDBG Disaster Recovery Grants** |
| **Name of Grantee:** | **Appropriation(s):**  |
| **Staff Consulted:** |
| **Name(s) of Reviewer(s)** |  | **Date** |  |

**NOTE:** As stated inChapter 2 of the monitoring handbook, an important and fundamental principle of the monitoring process is that HUD is required to make findings when there is evidence that a statute, regulation or requirement has been violated, but it retains discretion in identifying appropriate corrective action(s) to resolve deficiencies. An equally fundamental principle is that program participants have due process rights to contest findings (24 CFR part 570 subpart O for local governments and 24 CFR 570.495 for state grantees (in some cases, applicable waivers and alternative requirements may subject states to subpart O)).

As provided in Chapter 2, HUD reviewers are advised that certain questions contain, as a parenthetical below the question, statutory or regulatory citations and/or contract/agreement references. A negative response (“No”) by the HUD reviewer to any such question indicates noncompliance that constitutes a “finding.” Including the basis for the requirement enables the entity being monitored to specifically reference the program requirement at issue. That entity is not precluded from self-assessing during the monitoring to determine if it has information or documentation that would cause the HUD reviewer to form a different conclusion.

In this exhibit, most questions that address requirements contain the specific citation for the source of the requirement (specific citation to a section of a statute, regulation, *Federal Register* notice, or grant agreement). Where a specific citation is contained in the question, it may only apply to certain grants; carefully review the cited requirement to determine its applicability.

In other cases, the question generally references the source of the requirement (e.g., applicable *Federal Register* notices or grant agreement) but does not provide a specific citation. This is because statutory requirements, *Federal Register* notices (including waivers and alternative requirements), and grant agreements can vary significantly from appropriation to appropriation, and waivers and alternative requirements may vary from grantee to grantee. When the question contains a general reference to a source, the reviewer is instructed to review the source to confirm that the relevant requirement that relates to the question is contained in the source and applies to the grantee. The reviewer should answer the question based on the requirement that applies to the grantee. If the reviewer answers the question “no” because the grantee did not comply with the requirements in the source that apply to the grantee, the HUD reviewer must make a note of the applicable citation to document the violation that results in a finding of noncompliance.

Questions without a specific citation or a general reference to a controlling document do not address requirements. These questions are included to assist the reviewer in understanding the participant's program more fully and 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 cannot result in a "finding."

A “Note” included with a question is intended to assist the reviewer with answering the question and is not a statutory or regulatory citation and/or contract/agreement reference that signals that a negative response (“No”) by the HUD reviewer to the question indicates noncompliance that constitutes a “finding.”

**Instructions:** This Exhibit is to be used to monitor overall management carried out with CDBG disaster recovery (CDBG-DR) funds awarded for major disasters that occurred in 2019 and earlier, in addition to the applicable Addendum based on the disaster year being monitored. This exhibit is divided into four sections: A. Overall Management; B. Monitoring of Local Governments by State Grantees; C. Financial Thresholds; and D. Capacity and Performance. Per the *Federal Register* notices issued by the Department, CDBG-DR State grantees are provided a waiver and alternative requirement that allows them to carry out activities directly or through a subrecipient. HUD staff reviewing CDBG-DR grantees that use subrecipients should supplement this Exhibit with Exhibits 3-16 and 6-7.

|  |  |
| --- | --- |
| Programs and activities *are* directly administered by a state when: | Programs and activities are *not* directly administered by a state when: |
| * The state develops the program and activities guidelines/rules;
* A subrecipient applies directly to the state for funding to undertake activities.
 | * The state uses a method of distribution (MOD) to award funds to local governments;
* The state gives flexibility to units of local government to design and implement their own programs and activities; and
* The state releases the funds, but local governments are responsible for environmental reviews.
 |

Some state grantees may use a combination of the above. For example, they may administer a portion of CDBG-DR funds directly and distribute another portion through a MOD. To monitor any CDBG-DR grant, obtain copies of the appropriate *Federal Register* notice(s). See Attachment 6-1, “Document Reference Tool,” to determine which *Federal Register* notices are applicable, based on the disaster year that is being monitored.

**Questions:**

A. OVERALL MANAGEMENT

|  |  |
| --- | --- |
|  | List below the grants being monitored and the corresponding grant amounts (insert more rows as necessary). |
| CDBG-DR Grant(s) Amount ($) |
| [Insert grant number]            [Insert grant number]           [Insert grant number]           [Insert grant number]           *Total*       |
| **Describe Basis for Conclusion:**      |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Has the grantee developed policies and procedures specific to its CDBG-DR programs and key recovery operations?

**NOTE:** Generally, the key recovery operations and programs may include housing rehabilitation programs, buyout programs, duplication of benefits, procurement, infrastructure programs, economic revitalization programs, etc… |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| 1. If the grantee has amended any policies and procedures that were originally submitted to HUD for the grantee’s pre-award certifications (e.g., certification of proficient controls, processes, and procedures), are the amended submissions in compliance with the applicable *Federal Register* notice? **NOTE:** For example, amended Duplication of Benefits policies and procedures may require HUD-approval.

[See applicable *Federal Register* notice(s) to confirm if the grantee was required to submit pre-grant certifications and to reference the citation.]  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| **Please answer corresponding questions in applicable Addendum.** |  |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Is the grantee maintaining a comprehensive website regarding all disaster recovery activities? **NOTE:** This requirement is applicable to all grantees since March 5, 2013. [See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |
| --- | --- | --- |
|  | Does the grantee: |  |
|  | 1. Have a Citizen Participation Plan?

[24 CFR 91.115(a)(1), 24 CFR 91.105(a)(1), applicable *Federal Register* notice(s)] |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | 1. Have a Citizen Participation Plan that provides for and encourages citizens to participate in the development of the action plan, any substantial amendment to the action plan, and the performance report, and does the grantee take appropriate actions to encourage the participation of all its citizens/residents, including racial and ethnic minorities and non-English speaking persons, as well as persons with disabilities?

[24 CFR 91.115(a)(2)(i), 24 CFR 91.105(a)(2)(i)]  |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | 1. Provide the Citizen Participation Plan in a format accessible to persons with disabilities upon request (e.g., providing oral Braille, electronic, or large print copies for the visually impaired)?

[24 CFR 91.115(a)(3), 24 CFR 91.105(a)(3), see applicable *Federal Register* notice(s), 42 U.S.C. § 12101 et seq] |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | 1. Provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan, and make the citizen participation plan public?

[24 CFR 91.115(a)(3), 24 CFR 91.105(a)(3)] |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | 1. Describe in the Citizen Participation Plan its procedures for assessing its language needs and identify any need for translation of notices and other vital documents?

[24 CFR 91.115(a)(4), 24 CFR 91.105(a)(4), see applicable *Federal Register* notice(s)]  |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | 1. Specify in the Citizen Participation Plan that it will take reasonable steps to provide language assistance to ensure meaningful access to participation by non-English –speaking residents of the community?

[24 CFR 91.115(a)(4), 24 CFR 91.105(a)(4)]  |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** |  **No** |

 |
|  | **Describe Basis for Conclusion:**      |
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|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | If the waiver of the requirement for consistency with the grantee’s consolidated plan has expired, does the grantee’s consolidated plan include its disaster-recovery needs?**NOTE 1:** The reviewer can find the requirements at 42 U.S.C. 12706, 24 CFR 91.325(a)(5) & (b)(3), and 91.225(a)(5) & (b)(3). **NOTE 2:** Typically, HUD waives this requirement until the grantee submits its next full (3-5 year) consolidated plan, or 24 months from the applicability date of the applicable *Federal Register* notice. [See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| **Describe Basis for Conclusion:**      |
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|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Has HUD provided waivers or alternative requirements specific to the grantee? If the answer is “no,” select “N/A” and skip to the next question. If the answer is “yes,” provide the list in the table below to identify the grantee-specific waiver(s) and alternative requirement(s). The reviewer can add additional rows as necessary. [See applicable *Federal Register* notice or approval letters to find the grantees waivers] |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** | **N/A** |

 |

|  |
| --- |
| List the Grant Specific Waiver or Alternative Requirement(s)  |
|       |
|       |
|       |
|       |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the grantee’s grant agreement contain conditions that are specific to the grantee? If the answer is “no,” select “N/A” and skip to the next question. If the answer is “yes,” fill out the table below to identify the condition, the due date, the grantee’s current status, and identify if the condition has been met. The reviewer can insert more rows as necessary. [See applicable grant agreement and specific conditions] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  | **Describe Basis for Conclusion:** |
|  |       |

|  |  |  |  |
| --- | --- | --- | --- |
| **Grant Specific Conditions (set according to 2 CFR 200.208)** | **Due Date** | **Status** | **Condition Met** |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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|  |  |  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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|  |  |
| --- | --- |
|  | In regard to ***timeliness***: |
| 1. Does the grantee have procedures to ensure programs and activities meet established end dates?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Has the grantee established a timeline for expending all grant funds?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Does the grantee have a means of tracking the progress of each CDBG-DR funded project or activity?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  | 1. Is the grantee meeting its expenditure and performance projections?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. As additional funds are allocated, or program goals change, is the grantee amending its action plan to update its expenditure and performance projections?

**NOTE:** This requirement is applicable to all grantees since March 5, 2013.[See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Is there any indication that activities carried out by subrecipients adversely affect the grantee’s timeliness causing a delay in carrying out its CDBG-DR programs?

**NOTE:** For example, an adverse impact could be if one subrecipient has a particularly slow expenditure rate when it is compared to the grantee’s and other subrecipient’s expenditure rates. |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| If the answer to “f” above is “yes,” and the subrecipient is adversely affecting the grantee’s timeliness, describe the causes for the delay below.**NOTE:** For example, an adverse impact could be if significant amounts of funding for individual activities that are slow-moving.  |
|  | **Describe Basis for any** **Adverse Impacts:**      |
|  | **Describe Basis for Conclusion:**      |
|  |  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Is the grantee current and on time in submitting Quarterly Performance Reports (QPRs) in the Disaster Recovery Grant Reporting (DRGR) system? [See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

|  |  |
| --- | --- |
|  | Does the grantee have an information system to collect the following data for DRGR with regard to the use and expenditure of CDBG-DR funds: |
| 1. Physical location and/or geographic area?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Low- and moderate-income beneficiaries?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Racial/ethnic data (beneficiaries and displacees)?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Is the grantee’s information in its in-house records and DRGR accurate for the time period reviewed?

[24 CFR 570.490 and 570.506, as modified by waiver and alternative requirements in applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Are there discrepancies in the information in the grantee’s records (e.g., between the grantee’s in-house records and DRGR)?

**NOTE:** If the answer to this question is “yes,” additional review of the grantee’s recordkeeping procedures may be needed. For example, additional review may be needed to determine whether the discrepancies are isolated or systemic.  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |
| --- | --- |
|  | In regard to ***monitoring***: |
| 1. Do the grantee’s policies and procedures address monitoring?

**NOTE:** This requirement is applicable to all grantees since March 5, 2013.[See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Do the grantee’s monitoring policy and procedures include:
 |
| 1. Quarterly financial and performance reports received from subrecipients?

  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Evaluating each subrecipient’s risk of noncompliance for purposes of determining the appropriate monitoring?

 **NOTE 1**: The grantee’s evaluation may include the subrecipient’s prior experience with similar subawards, previous audit results, other monitorings, any significant staffing changes, and any substantially changed systems.  **NOTE 2**: The HUD reviewer may request information from the grantee on the results of the grantee’s risk evaluations and correlate those results to subsequent grantee monitorings of its subrecipients, in order to determine if the grantee’s evaluation is influencing monitoring actions, as required. [2 CFR 200.332(b) for local governments and states (applies to states through 24 CFR 570.489(m))] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| iii. Reviewing subrecipient progress toward program completion and method of disbursements, including quarterly reporting requirements of plan versus actual progress, and data reconciliation requirements?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| iv. Reviewing each subrecipient for evidence of conflict of interest?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| v. Reviewing each subrecipient for adherence to record retention policy? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Is the grantee monitoring recipients, subrecipients and contractors in accordance with the grantee’s policies and procedures?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Has the grantee’s use of CDBG-DR funds been monitored by its internal audit staff? An answer of “no” establishes a finding only if the grantee is not in compliance with its pre-award financial certifications, its Implementation Plan or Action Plan. If yes, for the funds audited, provide the following (attach additional pages/rows as necessary):

**NOTE 1:** The DRGR system has a module that collects this information. **NOTE 2:*** Internal Audit requirements are applicable to all grantees since March 5, 2013
* Implementation Plan requirements are applicable to all grantees since January 1, 2015

[See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| CDBG-DR Grant(s) | Date(s) of Internal Audit | Action(s) taken by Grantee in response to Internal Audit |
| [Insert grant number]       |        |        |
| [Insert grant number]       |        |        |
| [Insert grant number]       |        |        |
| [Insert grant number]       |        |        |
| **Describe Basis for Conclusion:** |
|       |

B. MONITORING OF LOCAL GOVERNMENTS BY STATE GRANTEES

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the state monitor and audit the activities of the units of general local government (“local government”), as necessary, to ensure compliance that performance goals are achieved, and if the local government has continuing capacity to carry out those activities in a timely manner including: **NOTE 1:** The monitoring options may include:* training and technical assistance;
* on-site reviews of program operations; or
* arranging for agreed-upon-procedures engagements as described in 24 CFR 200.425, Audit services.

**NOTE 2:** The reviewer may request information from the grantee as to the frequency of, subject areas of, and outcomes of the monitorings and audits in order to better document if the state is fulfilling its obligation to monitor and audit subrecipients as necessary.  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. A review of the required financial and performance reports; and

[2 CFR 200.332(d), 24 CFR 570.492(a) and Section 104(e)(2) of the HCDA] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Follow-up to ensure that units of general local governments take timely and appropriate action on deficiencies detected through audits, on-site reviews, and other means; and

[2 CFR 200.332(d), which applies to states through 24 CFR 570.489(m)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Issuance of a management decision for audit findings?

[2 CFR 200.332(d), which applies to states through 24 CFR 570.489(m)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did the state verify that every unit of general local government is audited as required by Subpart F, *Audit Requirements*, of 2 CFR Part 200 when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded $750,000? **NOTE:** The $750,000 threshold is set forth in 2 CFR 200.501, *Audit requirements.* [2 CFR 200.332(f), which applies to states through 24 CFR 570.489(m)] |

|  |  |  |
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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
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|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | If the state has found a case of noncompliance with a unit of general local government, has the state taken actions, as may be appropriate to:  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Prevent continuance of the deficiency;

[24 CFR 570.492(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| 1. Mitigate any adverse effects or consequences; and

[24 CFR 570.492(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| 1. Prevent a recurrence?

[24 CFR 570.492(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** |  **No** |  **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the state have established remedies for noncompliance by units of general local government? [24 CFR 570.492(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

C. Financial Thresholds

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Based on the grant expenditures to date, can the grantee meet the 70% (or other applicable) overall benefit requirement? **NOTE 1:** Typically, the overall benefit requirement is at least 70% of funds to benefit low- and moderate-income (LMI) persons. Some grantees have received an alternative overall benefit requirement. If an alternative requirement applies to the reviewed grantee, the reviewer should note this below, and indicate the applicable requirement.**NOTE 2:** The overall benefit requirement does not apply to Administrative & Planning funds, as those costs are assumed to benefit low- and moderate income persons. Subtract those activities out first, then calculate the 70% or other applicable overall benefit requirement.[See applicable *Federal Register* notice(s)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

- |
|  70% Requirement Currently Projected CDBG-DR Grant(s) Amount ($) Amount for LMI Activities ($) |
| [Insert grant number]                 [Insert grant number]                 [Insert grant number]                 [Insert grant number]                  |
| **Describe Basis for Conclusion:** |
|       |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the amount expended for administration activities appear sufficient in comparison to the amount expended for the grant overall, considering the cap on administrative expenditures? **NOTE 1:** For example, if a grantee has reached its 5 percent cap on administrative expenses but has only spent 50 percent of its program funds, this may be a cause for concern. **NOTE 2:** For specific questions related to the administrative cap, see the proper addendum for the disaster year being monitored. |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  5% Administrative Amount Expended Total CDBG-DR Grant(s) Cap ($) for Administration ($) Expenditures ($) |
| [Insert grant number]                       [Insert grant number]                       [Insert grant number]                       [Insert grant number]                        |
| **Describe Basis for Conclusion:** |
|       |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Is the grantee in compliance with the 15% public services cap?[See applicable *Federal Register* notice(s); 42 U.S.C. 5305(a)(8), and, for local government grantees, 24 CFR 570.201(e)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | 1. Based on expenditures to date, will the grantee meet the expenditure requirement associated with its HUD-identified most impacted and distressed areas (MIDs)?

**NOTE:** If the grantee's projections indicate that it might not meet its HUD-MID minimum expenditures, this may be a cause for a concern.[See applicable *Federal Register* notice(s) for the citation, the MID areas and the expenditure requirement] |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** | **No** |

 |
| 1. In addition to the HUD-MID areas, did the grantee identify its own most impacted and distressed areas (i.e. grantee-identified MIDs)?
 |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** | **No** |

 |
| 1. To date, has the grantee expended all funds in either a HUD-identified or grantee-identified MID area?

[See applicable *Federal Register* notice(s) for the citation, the MID areas, and the expenditure requirement]  |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** | **No** |

 |
| Most Impacted and Required Expenditures Expenditures in Distressed areas (MIDs) in MIDs ($) MIDs to date ($)  |
| [Insert MIDs]                  |
| **Describe Basis for Conclusion:** |
|       |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Identify the grantee’s expenditure deadline for all grant funds. Based on the expenditure deadline, is the grantee projected to meet its deadline? NOTE: If this answer is no, this may be a cause for concern.  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| Expenditure Deadline(s) Amount ($) Deadline Expenditures (mm/dd/yy) to date ($)  |
| Grant Agreement Signed                   |
|   |
| **Describe Basis for Conclusion:** |
|       |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Has the grantee monitored its subrecipients, including funds obligated by the subrecipients? If so, identify the subrecipients included in the grantee’s review below, including the budgeted funds made available to the subrecipient and the amount contractually obligated by the subrecipient (add rows as necessary).

|  |  |  |  |
| --- | --- | --- | --- |
| **Subrecipient Name** | **CDBG-DR Budget**  | **CDBG-DR Obligated by Subrecipient**  | **CDBG-DR Balance** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |

D. CAPACITY and PERFORMANCE

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Has the grantee provided a current organizational chart, or other document identifying CDBG-DR roles and responsibilities?

**NOTE:** Implementation Plans are required for every disaster since January 1, 2015.  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  | 1. Is this chart in accordance with the staffing plan submitted in the grantee’s Implementation Plan?
 |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  | **Describe Basis for Conclusion:**      |
|  |  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Has the grantee lost staff critical to its operations (e.g., program manager, environmental compliance officer) in the last fiscal year? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Is the grantee taking action to resolve any open findings or recommendations from either a HUD monitoring or Office of Inspector General (OIG) audit? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did the grantee receive any citizen complaints in the current fiscal year? If the answer is “yes,” please identify the nature of complaints below.**NOTE:** A HUD Reviewer should contact the local FHEO office for information about fair housing complaints.  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
|  **Nature of Complaint Approximate Number****Complaints Against the Grantee (e.g., topic, program, activity) of Complaints** |
| [Insert grant number]                  [Insert grant number]                  [Insert grant number]                  [Insert grant number]                   |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did any of the grantee’s subrecipients or units of general local government receive citizen complaints? If the answer is “yes,” please identify the nature and number of complaints below.**NOTE:** A HUD Reviewer should contact the local FHEO office for information about fair housing complaints. |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Complaints Against an Entity Nature of Complaint Approximate No. of****other than the Grantee Complaints** |
| [Insert grant number]                   [Insert grant number]                  [Insert grant number]                  [Insert grant number]                   |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | If the grantee, a subrecipient, or unit of general local government recipient received a citizen complaint, did they respond in the time period established by the waiver and alternative requirement in the applicable *Federal Register* notice (typically 15 working days), or if no period is specified, within a timely manner as provided in applicable consolidated planning regulations?**NOTE:** Usually, grantees must respond within 15 working days of receipt of the complaint, if practical, but reviewers should check the applicable notice for any requirement. Generally, this is addressed in the citizen complaints paragraph. [See applicable *Federal Register* notice to confirm the requirement and reference the citation, or if no period is required by the waiver and alternative requirement, cite to 24 CFR 91.105(j) for local governments and 24 CFR 91.115(h) for states]  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Is the grantee following its policies and procedures to detect and prevent fraud, waste and abuse as submitted in response to HUD’s pre-grant certifications?

[See applicable *Federal Register* notice(s) to confirm if the grantee was required to submit pre-grant certifications and to reference the citation] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Has the grantee identified and prevented any fraud, waste, or abuse by following its procedures?

If the answer is “yes,” please explain below.  |

|  |  |
| --- | --- |
| [ ]  | [ ]  |
| **Yes** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |