|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Guide for Review of Housing Rehabilitation and Reconstruction** | | | | |
| **Name of Grantee:** | | **Appropriation(s):** | | |
| **Staff Consulted:** | | | | |
| **Name(s) of Reviewer(s):** |  | | **Date:** |  |

**NOTE:**  As stated in Chapter 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 housing rehabilitation and reconstruction activities 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.  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* notice(s) are applicable, and make sure to use the applicable Addendum based on the disaster year being monitored. The Exhibit is divided into four sections: Scope of Review; Policies and Procedures; File Review; and Reporting and Oversight. This Exhibit should be used in place of Exhibits 3-10, 3-11, and 4-1.

**Questions:**

A. SCOPE OF REVIEW

|  |  |
| --- | --- |
|  | What entity is responsible for the direct administration of the program? |
| **Describe Basis for Conclusion:** |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the program include both rehabilitation and reconstruction activities? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Does the program include single family units? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Does the program include multifamily units? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Does the program include owner occupied units? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Does the program include rental units? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |

|  |  |
| --- | --- |
|  | Files reviewed (list all). |
| **List Files:** |
| |  |  |  | | --- | --- | --- | | Activity name or number | Funds Expended  ($) | Date of Expenditure (MM/DD/YYYY) | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |

B. POLICIES AND PROCEDURES

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the grantee have written housing rehabilitation and reconstruction policies and procedures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- |
|  | In regard to ***eligibility*** of activities, do the policies and procedures require: | |
| 1. Activities to relate to the impact of the applicable disaster(s)?   **NOTE:** In general, new construction or rehabilitation of units not damaged by the disaster are an eligible use of funds if the activity clearly addresses a disaster-impact (e.g., post-disaster housing need, displacement from disaster-affected areas to other places, etc.) and is located in a most impacted and distressed area. This impact can be demonstrated by the disaster’s overall effect on the quality, and affordability of the housing stock and the resulting inability of that stock to meet post-disaster needs and population demands.  [See applicable Appropriations Act and *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities to be located in an area that was Presidentially declared as a major disaster? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. A determination that the funded CDBG-DR activities are not reimbursable by, or for which funds are made available by, the Federal Emergency Management Agency (FEMA) or the Army Corps of Engineers? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities to be CDBG-DR eligible? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities to meet a national objective? If the answer is “yes,” list the applicable national objective(s) below. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | 1. Do the policies and procedures for rehabilitation and reconstruction require that all reimbursement activities are consistent with HUD guidance for charging pre-award (“reimbursement”) costs? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. In particular, do the grantee’s policies and procedures require the following: | |
| 1. Limit reimbursement activities to expenses incurred before the date on which the person or entity applied for CDBG-DR assistance?   **NOTE:** If the grantee received funding for disasters occurring between January 1, 2016, and December 31, 2021, the duplication of benefits (DOB) *Federal Register* notice published June 20, 2019 (84 FR 28836) applies and allows CDBG–DR funds to reimburse individuals and businesses (other than the grantee or subrecipients) for some costs of CDBG–DR eligible activities that were paid with subsidized loans under certain conditions. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Limit reimbursement activities to expenses incurred within one year after the date of the disaster, as applicable?   **NOTE:** For grantees in receipt of CDBG–DR funds for 2016 or 2017 disasters, the *Federal Register* notice published June 20, 2019 (84 FR 28848) applies and the provision of CPD Notice 2015–07 that limits reimbursement to those costs incurred within one year of the disaster shall not apply to reimbursement of costs paid by a subsidized loan. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | Do the grantee’s policies for the use of CDBG-DR ensure compliance with federal cross-cutting requirements including Davis Bacon, Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and Section 3 (as applicable) requirements as described in the applicable *Federal Register* notice(s)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- |
|  | Prior to answering the DOB questions in this exhibit reviewers MUST complete the DOB section in the applicable Addendum, based on the disaster year being monitored, to ensure proper compliance with DOB and applicable *Federal Register* notice(s).  **NOTE**: Failure to maintain policies and procedures to adequately address duplication of benefits could lead to a violation of the requirement for grants under Public Laws appropriating CDBG-DR funds that the grantee have “established adequate procedures to prevent any duplication of benefits” or otherwise lead to a violation of section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act. | |
| After completion of the DOB section in the applicable addendum, does the grantee illustrate compliance (i.e. “yes” responses for all DOB related questions)?  If so, the grantee’s policies and procedures are in place to **DOB**. | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Do the policies and procedures address recapture of CDBG-DR funds?  **NOTE:** Examples of why a grantee may need to address recapture of CDBG-DR funds could be in the case of an overpayment or duplication of benefits. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | In regard to ***rehabilitation and reconstruction activities,*** do the policies and procedures prohibit rehabilitation and reconstruction assistance for a second home?  **NOTE:** Generally, this requirement has applied since 2011. The reviewer should look at the applicable *Federal Register* notice(s) and Addendum for definition of second homes, which varies across disasters. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | **Describe Basis for Conclusion:** | |
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|  | In regard to housing ***rehabilitation and reconstruction***,do the policies and procedures require:  **NOTE:** Green building standards are not required (only recommended) for CDBG-MIT (mitigation) funds. | |
| 1. Compliance with the applicable green building standards? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Identification of which green building standard will be used for rehabilitation and reconstruction activities: ((i) ENERGY STAR (Certified Homes or Multifamily High-Rise), (ii) Enterprise Green Communities, (iii) LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), (iv) ICC-700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite), or (vi) any other equivalent comprehensive green building program acceptable to HUD)?   **NOTE 1:** The grantee may identify any and all of the above standards in its policies and procedures, as long as each file shows evidence that one of the standards was met.  **NOTE 2:** This question is applicable to all disasters between 2011 and 2019. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Documentation of which green building standard was used, such as a certification form, for each completed reconstruction activity? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Compliance with the guidelines specified in the HUD CPD Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** |  |

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| --- | --- | --- |
|  | In regard to ***activities in floodplains, flood hazard area or equivalent in FEMA’s data source identified in 24 CFR 55.2(b)(1),*** do the policies and procedures:  **NOTE**: If any of the answers below is “no,” the reviewer should consult its regional HUD Environmental Officer to determine the need for a program review and/or monitoring. | |
| 1. Require confirmation of compliance with Section 582(a) of the National flood Insurance Reform Act of 1994?   **NOTE 1:** Compliance with Section 582(a) typically means (1) a check to determine whether the applicant at any time received Federal flood disaster assistance that required the applicant to obtain and maintain flood insurance protection for the assisted property in accordance with the requirements of the Federal flood disaster assistance, but failed to do so; and if (1) occurred, (2) that no CDBG-DR funds are used to make a payment (including any loan assistance payment) to the applicant for repair, replacement, or restoration for flood damage to the assisted property in (1).  **NOTE 2:** For review of compliance with Section 582(a), use Exhibit 27-1 of this CPD Monitoring Handbook, “Guide for Review of Flood Insurance Protection,” especially questions 7, 8 and 11.  **NOTE 3:** In the case of Federal flood disaster relief assistance provided as a loan, a borrower is only required to maintain flood insurance protection for the assisted property for the life of the loan. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Require the purchase of flood insurance when CDBG-DR assistance is intended in whole or in part for the acquisition, construction, reconstruction, repair, or improvement of any publicly- or privately-owned housing, including a mobile home, and for any personal property contained therein, as a condition of approval of such assistance?   **NOTE:** Flood insurance typically covers structures and insurable personal property that could be destroyed in a flood. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Require that flood insurance be maintained during the life of an assisted property, regardless of transfer of ownership of such property? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Require housing that is reconstructed, repaired from substantial damage, or substantially improved to be elevated or floodproofed? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Please answer corresponding activity questions in applicable Addendum.** | |
| **Describe Basis for Conclusion:** | |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Do the policies and procedures include a method for determining whether applicants qualify for rehabilitation or reconstruction assistance?  **NOTE:** For example, a grantee’s policies and procedures may establish two different thresholds to determine if an applicant initially qualifies for rehabilitation or reconstruction assistance. As more information is known during the recovery process, an applicant’s unmet need (identified by the grantee) may change. An applicant who originally qualified for rehabilitation assistance may later qualify for reconstruction assistance. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Do the policies and procedures address monitoring of funded activities (e.g., priority and/or frequency)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the grantee have a Residential Anti-displacement and Relocation Assistance Plan (RARAP)?  [24 CFR 570.606(c); 24 CFR 42.325; See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

C. FILE REVIEW

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Do the grantee’s subrecipient agreements and loan/grant agreements explicitly require compliance with 24 CFR 570.606, URA, and Section104(d) requirements, as modified by applicable waivers and alternative requirements (including reporting and recordkeeping)?  [2 CFR 200.331(a)(2); 24 CFR 570.503; 24 CFR 570.606(a) and 24 CFR 570.606(g)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Does the grantee have a system for tracking and documenting acquisition and displacement activities?  **NOTE:** The grantee is required to maintain adequate records of its acquisition and displacement activities in sufficient detail to demonstrate compliance with the URA. The records shall be retained for at least 3 years after each owner of a property and each person displaced from the property receives the final payment to which he or she is entitled under the URA, or in accordance with the applicable regulations of the Federal funding Agency, whichever is later. A grantee that does not have a system for tracking and documenting acquisition and displacement activities may not be complying with 49 CFR. 24.9 and the if the answer is “no,” the reviewer must indicate this as a concern and notify the Regional Relocation Specialist. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Do the activity files and records document that the grantee is following its RARAP for the assisted activity under review?  [24 CFR 570.606(c); 24 CFR 42.325; applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | If the grantee and/or its subrecipient provides optional relocation assistance not required by State or local law, did the grantee or subrecipient:   * Provide the relocation assistance based on a written determination that such relocation assistance is appropriate   **AND**   * Adopt an Optional Relocation Policy that is available to the public and provides for equal relocation assistance within each class of displaced persons?   **NOTE:** The grantee or subrecipient may provide optional relocation assistance to persons displaced by activities that are not subject to the URA at 49 CFR part 24 or the RARAP. The grantee or subrecipient may also provide optional relocation assistance to persons receiving assistance under the URA or RARAP at levels in excess of those required by the URA or RARAP. Certain *Federal Register* notices have provided a waiver and alternative requirements to optional relocation assistance provisions to allow them to be conducted by grantees or to permit their subrecipients to establish separate optional relocation policies.  Briefly describe below the policy governing optional relocation assistance or attach a copy of the policy.  [24 CFR 570.606(d) (as modified by waiver and alternative requirements)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Was each occupied and vacant occupiable lower-income dwelling unit (as defined at 24 CFR 42.305) that was demolished or converted:   1. Replaced with an acceptable replacement unit;   **OR**   1. Comply with the grantee’s definition of ‘‘not suitable for rehabilitation” as a disaster-damaged unit under the waiver or alternative requirement for section 104(d) one-for-one replacement requirements (see Note below);   **OR**   1. In an area where HUD determined that there is an adequate supply of vacant lower-income dwelling units in standard condition available on a nondiscriminatory basis?   **NOTE 1:** Certain *Federal Register* notices have provided a waiver and alternative requirements to section 104(d) one-for-one replacement for disaster-damaged units that meet the grantee’s definition of not suitable for rehabilitation (as listed in option ii.), and waived section 104(d) relocation payments to the extent that they differ from URA permanent relocation assistance. Generally, there has been a waiver and alternative requirement since the March 5, 2013 notice. If no units were demolished or converted, reviewer must select “N/A.”  **NOTE 2:** If the answer to this question is “no,” the reviewer should consult with its regional FHEO contact to determine the need for a program review and/or monitoring.  [24 CFR 42.305; 24 CFR 42.375(a), (b), and (d) (as modified by waiver and alternative requirements if applicable); See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | **Describe Basis for Conclusion:** | |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did the grantee comply with the requirements of Section 414 of the Stafford Act or the waiver and alternative requirements for homeowner occupants and tenants displaced from their homes as a result of an identified disaster, if applicable?  **NOTE:** Under the *Federal Register* notices, homeowner occupants and tenants displaced from their homes as a result of the identified disaster and who would have otherwise been displaced, as a direct result of a federally funded program or project, may become eligible for a replacement housing payment, notwithstanding their inability to meet occupancy requirements prescribed in the URA. Reviewers must review the applicable *Federal Register* notice to determine if the grantee may use a waiver and alternative requirement.  Please describe below which waiver and alternative requirement the grantee used, if applicable.  [See applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Were tenants of rehabilitated properties informed of their right to appeal the determination concerning eligibility as a displaced person and/or the amount of relocation assistance?  [49 CFR 24.10; 24 CFR 42.390; 24 CFR 570.606(f)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Did the grantee or subrecipient review appeals filed by aggrieved persons, inform the person(s) of the right to request HUD review of the recipient’s determination, and if full relief was not granted, inform the person(s) of the right to seek a judicial review?  [49 CFR 24.10; 24 CFR 42.390; 24 CFR 570.606(f)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

If the Reviewer determines further relocation review may be required because of a “No” answer on a relocation question listed in this exhibit, please consult with the Regional Relocation Specialist.

|  |  |  |
| --- | --- | --- |
|  | In regard to ***eligibility*** of activities, do reviewed activity files document: | |
|  | 1. How the activities relate to a recovery need arising from the impact of the applicable disaster(s)?   [See applicable appropriation law and *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | 1. Activities are located in an eligible area that was Presidentially-declared as a major disaster?   [Applicable appropriation law, *Federal Register* notice(s), and in the grantee’s approved action plan for grantee-identified most impacted and distressed areas] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | 1. A determination that the funded CDBG-DR activities were not reimbursable by, and the CDBG-DR activities are not activities for which funds were made available by the Federal Emergency Management Agency or the Army Corps of Engineers?   [See applicable appropriation law (e.g., P.L. 110-252, P.L. 110-329, P.L. 113-2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | 1. Activities met CDBG eligibility requirements or are eligible pursuant to a CDBG-DR waiver or alternative requirement in the applicable *Federal Register* notice(s)?   [Section 105 of the HCDA for states; activities eligible under 24 CFR part 570, or subpart C for local governments; See applicable *Federal Register* notice(s).] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | 1. Activities were funded in accordance with the program or activity policies and procedures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | 1. HUD’s requirements for charging pre-award (‘reimbursement’) costs?   Refer to Question 7.  **NOTE 1:** See CPD Notice 15-07, Guidance for Charging Pre-Award Costs of Homeowners, Businesses, and Other Qualifying Entities to CDBG Disaster Recovery Grants, as amended by the June 20, 2019 *Federal Register* notice, 84 FR 28848, for CDBG-DR grants made in response to major disasters occurring in 2015, 2016, and 2017, and as may be further amended.  **NOTE 2:** This question is applicable to all disasters between 2011 and 2019.  [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
|  | **Describe Basis for Conclusion:** | |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | In regard to ***national objective***, do reviewed activity files document that activities met or will meet all criteria to demonstrate the activity satisfies a national objective?  [24 CFR 570.483 and 24 CFR 570.490 (State), or 24 CFR 570.208 and 24 CFR 570.506 (Entitlement), or applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

Reviewers must answer the national objective question below that corresponds to the national objective met by the activity: 27-28 (Low- and moderate-income housing national objective); 29 (Low- and moderate-income limited clientele national objective; or 30 (urgent need national objective).

Compliance with criteria for a national objective depends upon how activity has been structured. Refer to HUD guidance regarding the use of the Low- and Moderate-Income (LMI) national objective (housing, limited clientele, area benefit, etc.) AND the applicable *Federal Register* notices, which contain waivers and alternative requirements that modify LMI national objective criteria.

|  |  |  |
| --- | --- | --- |
|  | Low and Moderate-income Housing (LMH) national objective: | |
| 1. Do the reviewed activity files document that that each assisted structure met or will meet the criteria for the LMH national objective, including the applicable requirements for occupancy by low and moderate-income households (e.g., a 2-unit structure must have at least one unit for a low-and moderate-income households and a structure with > 2 units, at least 51 percent must be occupied by low and moderate-income households)?   **NOTE:** Where two or more rental buildings being assisted are or will be located on the same or contiguous properties, and the buildings will be under common ownership and management, the grouped buildings may be considered for this purpose as a single structure. Assisted housing activities that meet the requirements of paragraph 24 CFR § 570.208 (d)(5)(ii) or (d)(6)(ii) may also be considered a single structure.  [24 CFR 570.483(b)(3) and 24 CFR 570.490 (as modified by waiver and alternative requirement)(State); 24 CFR 570.208(a)(3) and 570.506(b) (Entitlement); See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. For owner-occupied housing, do the reviewed activity files document use of the appropriate income limits and household size to determine a unit is or will be occupied by a low- and moderate-income household?   [24 CFR 570.483(b)(3) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(3) and CFR 570.506(b)(4)(iii) (Entitlement)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. For rental housing, do the reviewed activity files document: 2. A definition of or standard for ‘‘affordable rents’’; 3. The required income limits for low and moderate-income households; 4. That the amount of rent charged (or will be charged after assistance) for each dwelling unit occupied by a low- and moderate-income household in each assisted structure meets or will meet the definition of “affordable rents”?   **NOTE:** Although the CDBG regulations dictate that the LMH national objective is met at occupancy, HUD encourages grantees to adopt and enforce periods of affordability for assisted structures. Reviewers must check the applicable *Federal Register* notice to determine whether minimum affordability periods are required.  [24 CFR 570.483(b)(3) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(3) and 24 CFR 570.506(b) (Entitlement); See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. For a multifamily structure with more than 2 units, do the reviewed activity files document either: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. At least 51 percent of the units are or will be initially occupied by low- and moderate-income households   [24 CFR 570.483(b)(3) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4) (Entitlement), See applicable *Federal Register* notice(s)]  **OR** |  |
| 1. Where less than 51 percent of the initial occupants are low and moderate income, the activity meets ALL of the following requirements:  * The CDBG-DR assistance reduced the development cost of the new construction of a multi-family, non-elderly rental housing project; and * At least 20% of the units are (or will be) occupied by low- and moderate-income households at affordable rents; and * The proportion of the CDBG-DR funding is not greater than the percentage of low- and moderate-income units.   [24 CFR 570.483(b)(3) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4) (Entitlement); See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | |  |  |  | |
| **Describe Basis for Conclusion:** | |
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|  | Do the reviewed activity files document that the rehabilitation or reconstruction of housing activity meets or will meet the criteria of the LMH national objective other than as described in the prior questions? (e.g., through a waiver/alternative requirement) | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

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|  | LMI Limited Clientele (LMC): Reviewed activity files document:  (To meet the LMC national objective, the answers to a. and b. must be “yes”) | |
| 1. That the activity meets one of the following tests and the activity’s benefits are NOT available to all residents of an area? 2. The program is limited to one or a combination of the 8 population segments (described at 24 CFR 570.208(a)(2)) presumed to be low- and moderate-income by HUD; or 3. The program requires information on family size and income that shows at least 51 percent of the beneficiaries are persons whose family income does not exceed the low- and moderate-income limit; or 4. The program has income eligibility requirements which limit the activity exclusively to low- and moderate-income persons and all persons benefiting are low- and moderate-income; or 5. The location of the housing is such that it may be concluded that the beneficiaries are primarily low- and moderate-income persons.   [24 CFR 570.483(b)(2) and 24 CFR 570.490 (as modified by waiver and alternative requirement)(State); 24 CFR 570.208(a)(2) and 24 CFR 570.506(b) (Entitlement); See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. That the activity meets the criteria for one of the following and is not one of the ineligible activities identified at 24 CFR 570.483(b)(2)(i)(A)-(C) or 24 CFR 570.208(a)(2)(i): | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. benefits a limited clientele, at least 51 percent of whom are low- or moderate-income persons   [24 CFR 570.483(b)(2) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(2) and 24 CFR 570.506(b) (Entitlement); See applicable *Federal Register* notice(s)]  **OR** |  |
| 1. serves to remove material or architectural barriers to the mobility or accessibility of elderly persons or of adults meeting the Bureau of the Census' Current Population Reports definition of “severely disabled”?   **NOTE:** If the answer to this question is “no,” the reviewer should consult with its regional FHEO contact to determine the need for a program review and/or monitoring.  [24 CFR 570.483(b)(2) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(2) and 24 CFR 570.506(b) (Entitlement); See applicable *Federal Register* notice(s)] |  |
| **Describe Basis for Conclusion:** | |

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|  | Do reviewed activity files document that the rehabilitation or reconstruction of housing met the criteria of the Urgent Need national objective, including one of the following: | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. *If the grantee received a waiver and is subject to an alternative requirement* of the certification requirements at 24 CFR 570.208(c) and 24 CFR 570.483(d) in a *Federal Register* notice, that the program responds to disaster-related impacts identified in the action plan needs assessment   **NOTE**: The action plan needs assessment under the alternative requirement must have referenced the type, scale, and location of the disaster-related impacts being addressed over the course of the expenditure of obligated grant funds for the program.  [24 CFR 570.483(d) and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(c) and 24 CFR 570.506(b)(12)(Entitlement); See applicable *Federal Register* notices]  **OR** |  |
| 1. The requirements at 24 CFR 570.208(c) and 24 CFR 470.483(d) if the waiver expired prior to the activity or if the grantee did not receive a waiver of the certification requirements?   [24 CFR 570.483(d) and 24 CFR 570.490 (as modified by waiver and alternative requirement); 24 CFR 570.208(c) and 24 CFR 570.506(b)(12)(Entitlement); See applicable *Federal Register* notice(s)] |  |
| **Describe Basis for Conclusion:** | |
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|  | If the grantee did not meet the criteria of a national objective that is described in the prior questions, do reviewed activity files document that the activity met or will meet the criteria of another national objective?  **NOTE**: Reviewers may choose to consult Chapter 3 and Chapter 4 Exhibits that include a guide for review of national objective criteria to ensure that the activity met or will meet the criteria of another national objective. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to ***activities in floodplains, flood hazard area or equivalent in FEMA’s data source identified in 24 CFR 55.2(b)(1),*** do the activity files document:  **NOTE**: If any of the answers below is “no,” the reviewer should consult its regional HUD Environmental Officer to determine the need for a program review and/or monitoring. | |
| 1. That the grantee confirmed applicants’ compliance with Section 582(a) of the National flood Insurance Reform Act of 1994 for properties?   **NOTE 1:** Compliance with Section 582(a) typically means (1) a check to determine whether the applicant at any time received Federal flood disaster assistance that required the applicant to obtain and maintain flood insurance protection for the assisted property in accordance with the requirements of the Federal flood disaster assistance, but failed to do so; and if (1) occurred, (2) that no CDBG-DR funds are used to make a payment (including any loan assistance payment) to the applicant for repair, replacement, or restoration for flood damage to the assisted property in (1).  **NOTE 2:** For review of compliance with Section 582(a), use Exhibit 27-1 of this CPD Monitoring Handbook, “Guide for Review of Flood Insurance Protection,” especially questions 7, 8, and 11.  **NOTE 3:** In the case of Federal flood disaster relief assistance provided as a loan, a borrower is only required to maintain flood insurance protection for the assisted property for the life of the loan.  [42 USC § 5154a(a)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. That an applicant’s purchase of flood insurance when CDBG-DR assistance is intended in whole or in part for the acquisition, construction, reconstruction, repair, or improvement of any publicly- or privately-owned housing, including mobile home, and for any personal property contained therein, as a condition of approval of such assistance?   **NOTE:** Flood insurance typically covers structures and insurable personal property that could be destroyed in a flood.  [42 USC 4012a and Applicable *Federal Register* notice.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Please answer corresponding activity questions in applicable Addendum.** | |
| **Describe Basis for Conclusion:** | |

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|  | In regard to additional requirements, as applicable, do reviewed activity files document compliance with requirements on*rehabilitation and reconstruction**activities* policies and procedures?  Refer to Question 4. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

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|  | In regards torequirements related to ***activities in floodplains,*** do the activity files reviewed document: | |
| 1. For all properties located in a flood disaster area, require confirmation of compliance with Section 582(a) of the National flood Insurance Reform Act of 1994? Specifically, a check to investigate whether the applicant at any time has received flood disaster assistance that was conditional on the person first having obtained flood insurance on the same property, but the person failed to obtain and maintain flood insurance as required under applicable Federal law on such property. If so, no Federal disaster relief assistance made available in a flood disaster area may be used to make a payment (including any loan assistance payment) to that applicant for repair, replacement, or restoration for damage to such personal, residential, or commercial property.   **NOTE:** For review of compliance with Section 582(a), use Exhibit 27-1 of the CPD Monitoring Handbook, “Guide for Review of Flood Insurance Protection,” especially questions 7, 8, and 11. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Allow activities to take place in an area delineated as a special flood hazard area (SFHA) according to FEMA’s most current flood advisory maps? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 34.b is “yes,” and if the activity constitutes financial assistance for acquisition or construction purposes, require owners of assisted buildings, mobile homes, or personal property within an SFHA to be covered by flood insurance prior to providing assistance, and require that the flood insurance is maintained during the life of the property, regardless of transfer of ownership of such property? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 34.b is “yes,” require activities within an SFHA to be designed or modified to minimize harm to or within floodplain in accordance with Executive Order 11988 and 24 CFR part 55?   **NOTE:** If the answer is “no,” reviewer should consult its regional HUD Environment Officer. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Require elevation standards when applicable to rehabilitation and reconstruction activities*?*   **NOTE:** See specific requirements in the applicable Addendum based on the disaster year being monitored. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to ***rehabilitation and reconstruction activities,*** do the activity files prohibit rehabilitation and reconstruction assistance for a second home?  **NOTE:** Generally, this requirement has applied since 2011. The reviewer should look at the applicable *Federal Register* notice(s) and Addendum for definition of second homes, which varies across disasters. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to housing ***rehabilitation and reconstruction***,do the activity files demonstrate:  **NOTE:** Green building standards are not required (only recommended) for CDBG-MIT (mitigation) funds. | |
| 1. Compliance with the applicable green building standards?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Identification of which green building standard will be used for rehabilitation and reconstruction activities: ((i) ENERGY STAR (Certified Homes or Multifamily High-Rise), (ii) Enterprise Green Communities, (iii) LEED (New Construction, Homes, Midrise, Existing Buildings Operations and Maintenance, or Neighborhood Development), (iv) ICC-700 National Green Building Standard, (v) EPA Indoor AirPlus (ENERGY STAR a prerequisite), or (vi) any other equivalent comprehensive green building program acceptable to HUD)?   **NOTE:** The grantee may identify any and all of the above standards in its policies and procedures, as long as each file shows evidence that one of the standards was met.  **NOTE 2:** This question is applicable to all disasters between 2011 and 2019.  [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Documentation of which green building standard was used, such as a certification form, for each completed reconstruction activity?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Compliance with the guidelines specified in the HUD CPD Green Building Retrofit Checklist to the extent applicable to the rehabilitation work undertaken, including the use of mold resistant products when replacing surfaces such as drywall?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

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|  | Have reviewed activities been monitored by the grantee in accordance with its policies and procedures?  Refer to Section B. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to Improper Payments, do reviewed activity files document:  **NOTE:** See 2 CFR 200.1 for the exact definition, but generally, an improper payment means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements; and includes any payment to an ineligible party, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper. | | | | |
| 1. That an improper payment of CDBG-DR funds was not made?   [See applicable *Federal Register* notice(s); 2 CFR 200.302(b)(4) and 2 CFR 200.303(d); 24 CFR 570.502] | | | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 38.a above is “no,” the grantee is taking prompt and appropriate corrective action?   **NOTE:** For example, seeking recapture of funds resulting from an improper payment could be an appropriate corrective action.  [See applicable *Federal Register* notice(s); 2 CFR 200.302(b)(4) and 2 CFR 200.303(d); 24 CFR 570.502] | | | | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **For reviewed activities with an improper payment, please complete the following:** | | | | |
| Activity name or  number | Improper payment amount ($) | Type of improper payment | Corrective action | |
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| Please ensure that the activity names or numbers listed correspond with those listed in Section A, Question 4 of this Exhibit. | | | | |
| **Describe Basis for Conclusion:** | | | | |

D. OVERSIGHT AND REPORTING

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|  | If the grantee is not directly administering the program or activity, in regard to oversight: | |
| 1. Is there evidence that the grantee is providing the subrecipient or subgrantee with technical assistance?   [See applicable *Federal Register* notice(s); Section 106(d)(2)(c)(ii) of the HCDA if this certification is not waived (States); 24 CFR 570.503] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Is the grantee monitoring activities through an on-site or remote review to effectively ensure compliance with its subrecipient or subgrantee agreement?   [See applicable *Federal Register* notice(s); 2 CFR 200.331; 24 CFR 570.501(b); 24 CFR 570.503] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Is the grantee receiving the subrecipient or subgrantee records that must be submitted to the grantee to comply with their subrecipient or subgrantee agreement?   [See applicable *Federal Register* notice(s); 24 CFR 570.503(b)(2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |  |  |  | |
| 1. Is the grantee complying with its policies and procedures regarding oversight of its subrecipients and subgrantees? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to the ***Disaster Recovery Grant Reporting (DRGR) system:*** | |
| 1. Are activities classified correctly in DRGR (e.g., the correct accomplishment type is associated with the applicable activity)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Do quarterly performance reports correctly record the appropriate performance measures (e.g., the number of properties acquired)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Do performance measures and projected end dates match the information in the program files? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
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|  | In regard to ***activity completion***: | |
| 1. Are activities completed in accordance with i. through iii. below:   If the answers to the sub-questions i. through iii. below are “yes,” the reviewer can select “yes” for this question. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. The completion dates or period of performance in the contract(s)?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. The completion dates in its action plan?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. The completion dates entered into DRGR?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 41.a above is “no,” was the action plan amended for any subsequent changes, updates or revisions of the projections?   [See applicable *Federal Register* notice(s)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 41.a above is “no,” are contracts amended and extended before they lapse?   **NOTE:** The reviewer should look at each applicable *Federal Register* notice(s) for the specific activity completion requirements for its Quarterly Performance Reports and contracts. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 41.a above is “no,” the reviewer should answer the sub-questions below and describe its basis for the conclusion: | |
| 1. Has the grantee determined the reason for the delay in the activity’s completion? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Has the grantee identified a corrective action to rectify the activity’s delay? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Has the grantee revised the activity’s completion deadline? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |