|  |
| --- |
| Guide for Review of CoC Subrecipient Grant Management |
| **Name of Recipient:**       |
| **Name of Subrecipient(s):**       |
| **Grant Number:**       |
| **Project Name:**       |
| **Staff Consulted:**       |
| **Name(s) of Reviewer(s)** |       | **Date** |       |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must select “NO” in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to assess the overall administration of the recipient’s compliance with subrecipient grant management requirements of the Continuum of Care (CoC) Program project. It is to be used when a recipient has at least one subrecipient for the project being monitored. It is divided into sixteen sections: Overall Subgrant Management & Oversight; Program Operations; Recordkeeping; Supportive Services; Homeless Management Information System (HMIS); Financial and Internal Controls; Match; Program Income; Limitation on Use of Funds; Termination of Assistance; Conflict of Interest; Displacement, Relocation and Acquisition; Environmental Review; Expenditure Caps; Lead-Based Paint Review; and Additional 2 CFR 200 Requirements. As required in the Uniform Administrative Requirements and the CoC Program interim rule, recipients are responsible for monitoring subrecipient activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Recipient monitoring must cover each program, function, or activity. The HUD review should begin at the recipient level, and if time and resources permit, a selected sample of subrecipients should be monitored on-site, using the sampling guidance in the introductory text to this Chapter.

The CoC program rule at 24 CFR part 578 generally incorporates the uniform administrative requirements, cost principles, and audit requirements, which were recently revised and codified at 2 CFR part 200. This Exhibit contains both questions to monitor compliance with 2 CFR part 200 and questions to monitor compliance with the former uniform administrative requirements, cost principles, and audit requirements (i.e., 24 CFR parts 84 and 85 (2013), 2 CFR parts 225 and 230 (2013), OMB Circular A-133). The questions regarding 2 CFR part 200 apply to funds awarded under the FY 2015 CoC Program Competition or later competitions. The questions regarding the former uniform administrative requirements, cost principles and audit requirements apply to funds awarded under the FY 2014 CoC Program Competition or earlier competitions.

For recipients engaged in procurement, completion of the relevant procurement Exhibit (Exhibit 29-13 or Exhibit 34-3) is mandatory. To determine whether Exhibit 29-13 or Exhibit 34-3 is the relevant procurement exhibit, see the instructions to Exhibit 29-13.

**Questions:**

A. OVERALL SUBGRANT MANAGEMENT & OVERSIGHT

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have the subrecipients established and maintained standard operating procedures OR adapted the recipient’s standard operating procedures to ensure that CoC Program funds are used in accordance with the provisions of the McKinney-Vento Act? [24 CFR 578.103(a)] |

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

 |
| **Describe Basis for Conclusion:** |
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2.

|  |
| --- |
| Have the subrecipients complied with the following certifications: |
| 1. to maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project;

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(i)] |

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

 |
| 1. the address or location of any family violence project assisted was not made public, except with express written authorization of the person responsible for the operation of such project;

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(ii)] |

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

 |
| 1. establish policies and procedures that are consistent with, and did not restrict, the exercise of rights provided by Subtitle B of Title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness;

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(iii)] |

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

 |
| 1. in the case of projects that provide housing or services to families, that the subrecipients designated a staff person to be responsible for ensuring that children who were served in the program were enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(iv)] |

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

 |
| 1. the subrecipients, their officers, and employees were not debarred or suspended from doing business with the Federal Government; and

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(v)] |

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

 |
| 1. information, such as data and reports, was provided as required by HUD?

[CoC Program Grant Agreement; 24 CFR 578.23(c)(4)(vi)] |

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

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| **Describe Basis for Conclusion:** |
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3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients take the educational needs of children into consideration when families were placed in housing and, to the maximum extent practicable, placed families with children as close as possible to their school of origin so as not to disrupt such children's education? [CoC Program Grant Agreement; 24 CFR 578.23(c)(7)] |

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

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| **Describe Basis for Conclusion:** |
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4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients use the centralized or coordinated assessment system established by the CoC as set forth in 24 CFR 578.7(a)(8)? **NOTE:** Victim service providers may choose not to use the CoC’s centralized or coordinated assessment system, provided that victim service providers used a comparable centralized or coordinated assessment system that met HUD's minimum requirements.[CoC Program Grant Agreement; 24 CFR 578.23(c)(9)] |

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

 |
| **Describe Basis for Conclusion:** |
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5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients follow the written standards for providing CoC Program assistance developed by the CoC, including the minimum requirements set forth in 24 CFR 578.7(a)(9)? [CoC Program Grant Agreement; 24 CFR 578.23(c)(10)] |

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

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| **Describe Basis for Conclusion:** |
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6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If monitored by the recipient, did the subrecipients respond to actively resolve monitoring deficiencies? |

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

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| **Describe Basis for Conclusion:** |
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B. PROGRAM OPERATIONS

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm that housing and facilities constructed or rehabilitated with CoC Program funds met state or local building codes, and in the absence of state or local building codes, the International Residential Code or International Building Code (as applicable to the type of structure) of the International Code Council? [24 CFR 578.75(a)(1); 24 CFR 578.103(a)(8) or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients physically inspect each unit to assure that the unit met Housing Quality Standards (HQS) before any CoC Program leasing assistance or rental assistance was provided to assist program participants? [24 CFR 578.75(b)(1); 24 CFR 578.103(a)(8) or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients inspect all units at least annually during the grant period to ensure that the units continued to meet HQS? [24 CFR 578.75(b)(2); 24 CFR 578.103(a)(8) or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Do records confirm that each CoC Program-assisted dwelling unit has at least one bedroom or living/sleeping room for each two persons?

[24 CFR 578.75(c); 24 CFR 578.103(a)(8) or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. Do records confirm that children of the opposite sex, other than very young children, are not required to occupy the same bedroom or living/sleeping room?

[24 CFR 578.75(c)(1); 24 CFR 578.103(a)(8) (or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later)] |

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

 |
| 1. If household composition changes during the term of assistance, do records confirm that the subrecipient relocated the household to a more appropriately sized unit and continued access to appropriate supportive services?

[24 CFR 578.75(c)(2); 24 CFR 578.103(a)(8) or 24 CFR 578.103(a)(9) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the subrecipients provide supportive housing for homeless persons with disabilities, do the records confirm that meals or meal preparation facilities were provided for program participants? [24 CFR 578.75(d); 24 CFR 578.103(a)] |

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

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| **Describe Basis for Conclusion:** |
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12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients conduct an ongoing assessment of the supportive services needed by program participants, the availability of such services, and the coordination of services needed to ensure long-term housing stability and made adjustments, as appropriate? [24 CFR 578.75(e)] |

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

 |
| **Describe Basis for Conclusion:** |
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13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients provide residential supervision as necessary to facilitate the adequate provision of supportive services to the residents of the housing throughout the term of the commitment to operate supportive housing? [24 CFR 578.75(f)] |

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

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| **Describe Basis for Conclusion:** |
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14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Was there participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient?[24 CFR 578.75(g); 24 CFR 578.103(a)(12) or 24 CFR 578.103(a)(13) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients, to the maximum extent practicable, involve homeless individuals and families through employment; volunteer services; or otherwise in constructing, rehabilitating, maintaining, and operating the project, and in providing supportive services for the project? [24 CFR 578.21(c)(3); 24 CFR 578.75(g); 24 CFR 578.103(a)(12) or 24 CFR 578.103(a)(13) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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| **Describe Basis for Conclusion:** |
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16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the subrecipients require program participants to take part in supportive services, do the records confirm that any required supportive services were not disability-related services provided through the project as a condition of continued participation in the program? [24 CFR 578.75(h); 24 CFR 578.103(a)] |

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

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| **Describe Basis for Conclusion:** |
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C. RECORDKEEPING

17.

|  |
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| Where an occupancy charge or rent is charged to a household, do records reflect that the subrecipients retained the following documentation of annual income: |
| 1. income evaluation form completed by the subrecipients;

[24 CFR 578.103(a)(6)(i) or 24 CFR 578.103(a)(7)(i) for funds awarded under the FY 2015 CoC Program Competition or later]  |

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

 |
| 1. source documentation for the assets held by the program participant and income received before the date of the evaluation (e.g., most recent wage statement, unemployment compensation statement, public benefits statements, bank statement);

[24 CFR 578.103(a)(6)(ii) or 24 CFR 578.103(a)(7)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. if source documents were unavailable, a written statement by the relevant third party or the written certification by the recipient’s intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period; or

[24 CFR 578.103(a)(6)(iii) or 24 CFR 578.103(a)(7)(iii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. if source documents and third party verification were unavailable, the written certification by the program participant of the amount of income that the program participant was reasonably expected to receive over the 3-month period following the evaluation?

[24 CFR 578.103(a)(6)(iv) or 24 CFR 578.103(a)(7)(iv) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| **Describe Basis for Conclusion:** |
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18.

|  |
| --- |
| Did the subrecipient retain records of the following: |
| 1. copies of all solicitations of and agreements with its subrecipients, records of all payment requests by and dates of payments made to its subrecipients, and documentation of all monitoring and sanctions of its subrecipients, as applicable;

[24 CFR 578.103(a)(16)(i) or 24 CFR 578.103(a)(17)(i) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. monitoring records, including any monitoring findings and corrective actions required;

[24 CFR 578.103(a)(16)(ii) or 24 CFR 578.103(a)(17)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. copies of all procurement contracts and documentation of compliance with the applicable procurement requirements?

[24 CFR 578.103(a)(16)(iii) or 24 CFR 578.103(a)(17)(iii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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| **Describe Basis for Conclusion:** |
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19.

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| Did the subrecipients develop and implement written procedures to ensure the following: |
| 1. all records containing protected identifying information of any individual or family who applied or receives CoC Program assistance would be kept secure and confidential;

[24 CFR 578.103(b)(1)] |

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

 |
| 1. the address or location of any family violence project assisted with CoC Program funds would not be made public, except with the express written authorization of the person responsible for the operation of the project; and

[24 CFR 578.103(b)(2)] |

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

 |
| 1. the address or location of any housing of a program participant would not be made public, except as provided under preexisting privacy policy of the recipient and consistent with State and local laws regarding privacy and obligations of confidentiality?

[24 CFR 578.103(b)(3)] |

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

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| **Describe Basis for Conclusion:** |
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20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients retain confirmation of each program participants’ qualification as a family or individual at risk of homelessness or as a homeless family or individual, and other program participant records which must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served? [24 CFR 578.103(c)(1)] |

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

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| **Describe Basis for Conclusion:** |
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D. SUPPORTIVE SERVICES

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were available supportive services that were provided by the subrecipients designed to address the needs of program participants? [24 CFR 578.37(a)(1)(i); 24 CFR 578.53(a)] |

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

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| **Describe Basis for Conclusion:** |
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22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the subrecipients conduct an annual assessment of the service needs of the program participants and adjust services accordingly? [24 CFR 578.53(a)(2); 24 CFR 578.53(e)(1)] |

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

 |
| **Describe Basis for Conclusion:** |
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E. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

**NOTE**: The HUD reviewer MUST complete Exhibit 29-10, *Guide for Review of CoC Homeless Management Information System (HMIS) Requirements*, to answer questions 23-25.

23.

|  |  |  |  |  |  |  |  |
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| If the subrecipients are victim services providers, or legal services providers, do the records confirm grant funds were expended to establish and operate a comparable database that complies with HUD’s HMIS requirements? [24 CFR 578.57(a)(3); 24 CFR 578.103(b)] |

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

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| **Describe Basis for Conclusion:** |
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24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm grant funds expended for HMIS costs complied with HMIS requirements published by HUD? [24 CFR 578.57(b); 24 CFR 578.103(a)] |

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

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| **Describe Basis for Conclusion:** |
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25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have the subrecipents submitted client data to the CoC-designated HMIS (or comparable database, as applicable) for all program participants assisted?[24 CFR 578.103(a)] |

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

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| **Describe Basis for Conclusion:** |
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F. FINANCIAL AND INTERNAL CONTROLS

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Were grant funds expended for the payment of project administration costs related to the planning and execution of CoC activities, including costs for staff and overhead directly related to carrying out overall program management, coordination, monitoring, and evaluation; providing training on CoC program requirements and attending HUD-sponsored CoC trainings; and carrying out environmental reviews? [24 CFR 578.59(a); 24 CFR 578.103(a)] |

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

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| **Describe Basis for Conclusion:** |
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27.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the fiscal records indicate that the subrecipients have effective control over, and accountability for, all grant funds, property and other assets, and that these assets are adequately safeguarded?[24 CFR 578.99(e); 578.103(a); 24 CFR 84.21(b)(3); 24 CFR 85.20(a); 24 CFR 85.20(b); 2 CFR 200.302] |

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

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| **Describe Basis for Conclusion:**      |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of the sample transaction records indicate that grant expenditures were eligible costs under regulations, were necessary and reasonable for proper and efficient administration of the program, were allocable to the program, and supported by adequate source documentation (invoices, contracts, or purchase orders)?[24 CFR 578.37; 24 CFR 578.103(a); 24 CFR 84.21(b); 24 CFR 85.20(a); 24 CFR 85.20(b); 2 CFR 200.403] |

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

 |
| **Describe Basis for Conclusion:** |
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29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did a review of the subrecipients’ financial records demonstrate that cash payments were not being provided directly to the program beneficiaries except for reasonable stipends for program participants in employment assistance and job training programs?  |

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

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

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If single audits are required for the subrecipients, is there documentation that the audits have been reviewed for compliance and that the subrecipients have taken appropriate follow-up actions, if necessary?[24 CFR 578.99(g); 24 CFR 578.103(a)(15) or 578.103(a)(16) for grants awarded under the FY 2015 CoC Program Competition or later] |

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

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

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If any indirect costs were charged to the grant, do records confirm that the allocations to each eligible activity were consistent with an indirect cost rate proposal developed in accordance with applicable requirements? [24 CFR 578.63(b); 24 CFR 578.103(a)] |

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

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

G. MATCH

32.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records document that the recipient or subrecipients provide at least a 25 percent match for all funds (except leasing funds) for each grant? **NOTE**: The HUD reviewer MUST complete Exhibit 29-11, *Guide for Review of CoC Match Requirements*, to answer this question.[24 CFR 578.73(a); 24 CFR 578.103(a)(10) or 24 CFR 578.103(a)(11) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

H. PROGRAM INCOME

33.

|  |
| --- |
| If the subrecipients engaged in grant-supported activities that generate program income, do records confirm the following: |
| 1. program income earned during the grant term was retained by the recipient and committed to the project?

[24 CFR 578.97(b); 24 CFR 578.103(a)] |

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

 |
| 1. program income was expended on eligible costs?

[24 CFR 578.97(b); 24 CFR 578.103(a)] |

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

 |
| 1. costs incident to the generation of program income were deducted from gross income to calculate the program income, provided the costs have not been charged to grant funds?

[24 CFR 578.97(b); 24 CFR 578.103(a)] |

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

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

I. LIMITATION ON USE OF FUNDS

34.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In providing services and outreach activities related to such services supported in whole or part with CoC Program funds, did the subrecipients discriminate against program participants or prospective program participants on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice? [24 CFR 578.87(b)(1)(i); 24 CFR 578.87(b)(1)(ii); 24 CFR 578.103(a)(13) or 24 CFR 578.103(a)(14) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

35.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did a review show that CoC Program funds were not used to support or engage in explicitly religious activities?[24 CFR 578.87(b)(3); 24 CFR 578.103(a)(13) or 24 CFR 578.103(a)(14) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

36.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a program participant or prospective program participant objected to the religious character of the subrecipients that provided services, did the subrecipients undertake reasonable efforts to identify and refer the program participant to an alternative provider to which the program participant has no objection?[24 CFR 578.87(b)(4); 24 CFR 578.103(a)(13) or 24 CFR 578.103(a)(14) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

J. TERMINATION OF ASSISTANCE

37.

|  |
| --- |
| Do records confirm that the subrecipients had a formal termination of assistance process that consists of the following: |
| 1. a written copy of the program rules and the termination process provided to the participant before the participant began to receive assistance;

[24 CFR 578.93(b)(1); 24 CFR 578.103(a)(7)(ii) or 24 CFR 578.103(a)(8)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. written notice to the program participant containing a clear statement of the reasons for termination;

[24 CFR 578.91(b)(2); 24 CFR 578.103(a)(7)(ii) or 24 CFR 578.103(a)(8)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. a review of the decision, in which the program participant was given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

[24 CFR 578.91(b)(3); 24 CFR 578.103(a)(7)(ii) or 24 CFR 578.103(a)(8)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

 |
| 1. prompt written notice of the final decision to the program participant?

[24 CFR 578.91(b)(4); 24 CFR 578.103(a)(7)(ii) or 24 CFR 578.103(a)(8)(ii) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

K. CONFLICT OF INTEREST

38.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If records document that the recipient and its employees, agents, consultants, officers, and elected or appointed officials, or its subrecipients did not render impartial assistance in the provision of any type or amount of assistance because of activities or relationships with other persons or organizations, do records document that the conflict of interest was resolved to HUD’s satisfaction? [24 CFR 578.95(c); 24 CFR 578.103(a)(11) or 24 CFR 578.103(a)(12) for funds awarded under the FY 2015 CoC Program Competition or later] |

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

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

39.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If records document that the recipient’s and its employees, agents, consultants, officers, elected or appointed officials of the recipient, or its subrecipients have not complied with the individual conflict of interest requirements at 24 CFR 578.95(d) or did not obtain an exception from HUD, do records document that the conflict of interest was resolved to HUD’s satisfaction? [24 CFR 578.95(d)(3); 24 CFR 578.103(a)(11) or 24 CFR 578.103(a)(12) for funds awarded under the FY 2015 CoC Program Competition or later]  |

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

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

L. DISPLACEMENT, RELOCATION, AND ACQUISITION

40.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a CoC Program household was displaced during the grant term, do records confirm that the subrecipients complied with the requirements of 24 CFR 578.83? [24 CFR 578.83; 24 CFR 578.103(a)] |

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

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

M. ENVIRONMENTAL REVIEW

41.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do records confirm an environmental review was completed prior to committing or expending CoC Program funds or local funds on any eligible program activities or acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a CoC project?[24 CFR 578.103(a)] |

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

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

N. EXPENDITURE CAPS

42.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the recipient and its subrecipients in compliance with the component or activity caps imposed by program regulations, and are all costs subject to the expenditure caps properly classified? [24 CFR 578.39(a); 24 CFR 578.59(a); 24 CFR 578.59(b)(1); 24 CFR 578.89] |

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

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

O. LEAD BASED PAINT REVIEW

43.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Lead-based paint: Where CoC funds were used for rehabilitation, acquisition, supportive services, operating, leasing, tenant-based rental assistance (TBRA), or project-based rental assistance (PBRA) of a structure constructed before 1978, do the records reflect that the subrecipient complied with all lead-based paint requirements? **NOTE:** The HUD reviewer MUST complete the applicable Exhibits in Chapter 24 of this Handbook to answer this question: Exhibit 24-1 (Rehabilitation); Exhibit 24-2 (Acquisition, Leasing, Support Services, or Operations); Exhibit 24-3 (TBRA); or Exhibit 24-4 (PBRA).[24 CFR 35.700-730; 24 CFR 35.900-940; 24 CFR 35.1000-1020; 24 CFR 35.1200-1225; 24 CFR 578.99(f); 24 CFR 578.75(b)] |

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

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

P. ADDITIONAL 2 CFR 200 REQUIREMENTS (for funds awarded under the FY 2015 CoC Program Competition or later)

44.

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient provides funds through either a subrecipient agreement or a contract, has it followed the criteria in 2 CFR 200.330 for making case-by-case determinations of whether the entity is receiving the funds in the role of either a subrecipient or contractor?[24 CFR 578.99(e); 2 CFR 200.330]  |

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

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

45.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In making an award to a subrecipient, has the non-Federal entity evaluated each subrecipient’s risk of noncompliance with the Federal statutes, regulations, and terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring?**NOTE**: This evaluation may include consideration of factors such as:* the subrecipient’s prior experience with the same or similar subawards;
* the results of previous audits, including whether or not the subrecipient receives a Single Audit in accordance with Subpart F of 2 CFR part 200, and the extent to which the same or similar subaward has been audited as a major program;
* whether the subrecipient has new personnel or new or substantially changed systems; and
* the extent and results of previous HUD monitoring, if the subrecipient also receives funds directly from HUD.

[24 CFR 578.99(e); 2 CFR 200.331(b)] |

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

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

46.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each subaward provided to a subrecipient, has the non-Federal entity clearly identified it as a subaward to a subrecipient and included the following information at the time of the subaward:1. Federal award identification?
2. Subrecipient name (which must match the name associated with the unique entity identifier)?
3. Subrecipient’s unique entity identifier?
4. HUD award identification number?
5. Federal award date, as defined in 2 CFR 200.39 (the date that HUD signed the award to the recipient)?
6. Subaward period of performance start and end date?
7. Total amount of the Federal award committed to the subrecipient by the pass-through entity?
8. Amount of Federal funds obligated by this action by the pass-through entity to the subrecipient?
9. Total amount of Federal funds obligated to the subrecipient by the pass-through entity, including the current obligation?
10. Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)?
11. HUD’s name, the name of the non-Federal entity, and contact information for the awarding official of the non-Federal entity?
12. Catalog of Federal Domestic Assistance (CFDA) number and name of the HUD program under which the award is made?
13. Identification of whether the award is Research & Development (R&D), if applicable?
14. Indirect cost rate for the HUD award to the recipient?
15. Indirect cost rate for the subaward, if applicable (which must be an approved Federally-recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in §200.414(f))?
16. All requirements imposed by the non-Federal entity on the subrecipient so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the HUD award to the recipient?
17. Any additional requirements imposed by the non-Federal entity on the subrecipient in order for the non-Federal entity to meet its own responsibility to HUD, including identification of any required financial or performance reports?
18. A requirement that the subrecipient permit the non-Federal entity and auditors to have access to the subrecipient’s records and financial statements as necessary for the non-Federal entity to meet its requirements under 2 CFR part 200?
19. Appropriate terms and conditions concerning closeout of the subaward?

[24 CFR 578.99(e); 2 CFR 200.331(a)]  |

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

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

47.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. For subawards provided to subrecipients, has the non-Federal entity monitored the activities of the subrecipient as necessary to ensure that the subaward was used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are being, or have been, achieved? [24 CFR 578.99(e); 2 CFR 200.331(d)] |

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

 |
| **Describe Basis for Conclusion:**      |
| b. Did the non-Federal entity’s monitoring of the subrecipient include:* Reviewing financial and performance reports required by the non-Federal entity?
* Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the subaward detected through audits, on-site reviews, or other means?
* Issuing a management decision for audit findings pertaining to the subaward a required by 2 CFR 200.521?

[24 CFR 578.99(e); 2 CFR 200.331(d)(1) – (3)] |

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

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

48.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. For each subrecipient provided a subaward, has the non-Federal entity determined whether the subrecipient met or exceeded the audit threshold set in 2 CFR 200.501 for the respective fiscal year?[24 CFR 578.99(e); 2 CFR 200.331(f)] |

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

 |
| **Describe Basis for Conclusion:**      |
| b. If a subrecipient meets the audit threshold in 2 CFR 200.501, has the non-Federal entity verified that the subrecipient is audited as required by Subpart F of 2 CFR part 200?[24 CFR 578.99(e); 2 CFR 200.331(f)] |

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

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

49.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For each subrecipient receiving a subaward, has the non-Federal entity considered whether the results of the subrecipient’s audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the non-Federal entity’s own records?[24 CFR 578.99(e); 2 CFR 200.331(g)] |

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

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

50.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the non-Federal entity found any subrecipient non-noncompliant, did the non-Federal entity consider taking enforcement action against the subrecipient per 2 CFR 200.338 and the program regulations?[24 CFR 578.99(e); 2 CFR 200.331(h)] |

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

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