|  |  |  |  |
| --- | --- | --- | --- |
| **Guide for Review of SHOP Grant Program** | | | |
| **SHOP Grantee:** | | | |
| **Grant Number:** | | | |
| **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 make a finding of noncompliance. All other questions (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 grantee’s SHOP grant program. It is divided into eight sections: Overall Management; Program Progress, Reporting and Oversight; Written Agreements; SHOP Affordability Requirements; Property Standards; Other Requirements; Recordkeeping; and Financial Management. This Exhibit can only be used for monitoring SHOP grants awarded in Fiscal Year 2014 and later to which the requirements of 2 CFR part 200 apply. Because the SHOP Notice of Funding Availability (NOFA) and grant agreements change from year to year, confirm that you are using the correct NOFA and grant agreement before beginning your review. Exhibit questions that do not reflect that year’s NOFA and grant agreement requirements do not apply and cannot be the basis of a Concern or a Finding.

**Questions:**

A. OVERALL MANAGEMENT

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are the duties and responsibilities of SHOP grantee staff clearly defined and understood by both management and staff? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are lines of authority clearly outlined and understood by both management and staff? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are there systems in place that establish deadlines and track employee performance of specific tasks? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are there systems to ensure that staff receives the appropriate information to enable them to complete tasks timely? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

B. Program Progress, Reporting and Oversight

5.

|  |  |
| --- | --- |
| The grantee must comply with the monitoring, reporting and recordkeeping requirements at 2 CFR 200.327 through 200.329. | |
| Does the grantee submit reports to HUD in such a manner, schedule and form as required by HUD, including quarterly and annual progress reports, annual financial reports, and audits?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the reports that the grantee has submitted to HUD, are projects progressing timely (e.g., Grant funds being expended) within the SHOP grant term?  [SHOP Grant Agreement; 2 CFR 200.309] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the SHOP Quarterly Reports, and other information obtained by HUD through its monitoring of the grant, is the SHOP grantee carrying out eligible activities in compliance with its Grant Agreement requirements?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee have an internal control system for tracking the progress of projects from commitment to completion and occupancy and otherwise ensuring compliance with the terms and conditions of the Grant award?  [SHOP Grant Agreement; 2 CFR 200.303] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the SHOP grantee adopted and implemented administrative practices and procedures that are necessary to ensure timely performance and compliance with the terms of all applicable SHOP requirements?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |
| --- |
| Does the grantee have a plan which manages and monitors each subaward to an affiliate or consortium member in accordance with HUD requirements?  [SHOP Grant Agreement; 2 CFR 200.328] |
| **Describe Basis for Conclusion:** |
|  |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee review the progress of affiliates to ensure that project commitments result in disbursements and, ultimately, completed projects?  [SHOP Grant Agreement; 2 CFR 200.327- 200.329] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If affiliates are not making adequate progress, does the SHOP grantee take action to correct the lack of progress?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

C. Written Agreements

13.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the SHOP grantee execute written agreements with SHOP affiliates before committing or disbursing funds?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| b. Do the written agreements include all required provisions?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| c. Are written agreements effective for the performance period of the affiliates?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee have systems to ensure that all costs paid with SHOP funds are eligible as outlined in 2 CFR part 200, subpart E (“Cost Principles”)?  [SHOP Grant Agreement; 2 CFR 200.302] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee have systems to ensure that all costs paid with SHOP funds are reasonable?  [SHOP Grant Agreement; 2 CFR 200.302] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. SHOP AFFORDABILITY Requirements

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the SHOP grantee using the current SHOP income limits issued by HUD for its SHOP grant?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee have procedures to document that assisted homebuyers are income-eligible?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

E. PROPERTY Standards

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee have procedures that ensure that all SHOP units meet applicable property standards?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

19.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the SHOP grantee adopted written rehabilitation standards (i.e., methods and materials standards) for its rehabilitation programs?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the SHOP grantee identified property standards and codes applicable to SHOP projects?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the grantee ensure that all SHOP units are decent, safe and sanitary non-luxury dwellings that comply with all Federal requirements, state and local codes, ordinances, and zoning requirements, and with all SHOP requirements, including requirements for accessibility, energy efficiency, and water conservation?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

F. Other Requirements

22.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee complete an environmental review under 24 CFR part 50 or part 58 prior to undertaking any project or activity or committing Federal or non-Federal funds or assistance to a project or activity that could limit reasonable choices or could produce an adverse environmental impact, except for advancing non-grant funds to acquire land before completion of an environmental review, which is permitted under SHOP?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

G. Recordkeeping

23.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee maintain records to demonstrate compliance with SHOP requirements?  [SHOP Grant Agreement; 2 CFR 200.333 -200.337] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Are records retained for the time periods specified in the SHOP grant agreement?  [SHOP Grant Agreement; 2 CFR 200.333] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

H. Financial Management

25.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee disburse funds in accordance with 2 CFR 200.305?  [SHOP Grant Agreement; 2 CFR 200.305] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If any interest in excess of $500 was earned on funds not expended for eligible costs within 15 days of drawdown, has it been returned to the Department of Health and Human Services Payment Management System at least quarterly?  [SHOP Grant Agreement; 2 CFR 200.305] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

27.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do financial records identify the source and application of funds for each fiscal year?  [2 CFR 200.305] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

28.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the grantee deposit earnings into the grantee’s SHOP Grant Fund account in accordance with HUD’s SHOP Grantee Financial Instructions provided in APPENDIX III?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

29.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| After expiration of its grant term, does grantee use its earnings, if any, for affordable housing activities?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

30.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| As of the grant term expiration date for SHOP eligible activities, does the grantee report to HUD on the use of such earnings in accordance with HUD instructions?  [SHOP Grant Agreement] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

31.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the SHOP grantee maintain records that demonstrate adequate budget compliance?  [SHOP Grant Agreement; 2 CFR 200.327 through 200.329] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |