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| --- | --- | --- | --- |
| **Guide for Review of HPRP Other Federal Requirements** | | | |
| **Name of Grantee:** | | | |
| **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). Note, however, that certain questions in this Exhibit reference reviews conducted using Exhibits elsewhere in this Handbook. If a requirement is not met, HUD must make a finding of noncompliance. Where responses to questions for this Exhibit are based on other Exhibit reviews, the conclusions should be noted here, as applicable. 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 evaluate the HPRP grantee’s compliance with other applicable Federal requirements. It is divided into 4 sections: Drug-Free Workplace; Lobbying Restrictions; Compliance with Non-Discrimination, Section 504 of the Rehabilitation Act of 1973, and Other Equal Opportunity Requirements; and Lead Hazard Abatement Requirements. Note, however, that the Davis-Bacon prevailing wage requirements do not apply to the HPRP program. In addition, activities associated with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (acquisition, rehabilitation, demolition, displacement or relocation) are ineligible HPRP activities. Pursuant to 24 CFR 50.19(b)(3), (11), and (12), all HPRP eligible activities are categorically excluded from assessment under the National Environmental Policy Act of 1969 (42 U.S.C. 4321) and are not subject to environmental review under the related laws and authorities.

For certain requirements, a reference is made to other Exhibits or Chapters in this Handbook. If other Exhibits are used to monitor these areas, only the conclusion(s) should be noted here with a cross-reference to the supporting Exhibit. If the requirement does not pertain to the HPRP grantee, mark “N/A.” If the area is not covered during this monitoring, write under the applicable “Describe Basis for Conclusion” box: “Not covered due to \_\_\_\_\_\_ (*provide reason*).” If compliance monitoring for the areas below has been conducted in the past 12months, under either the HPRP or other HUD programs, it is not necessary to review these areas again unless the last risk analysis results or subsequent information raise questions or concerns.

**Questions:**

A. drug-free workplace

1.

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| Does the HPRP grantee have a drug-free workplace statement per the requirements of 24 CFR 21.200?  [HPRP Notice - Section VII. Other Federal Requirements (J) Drug-Free Workplace Requirements, 24 CFR 21.200] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the requirements of the Drug-Free Workplace actions were monitored, is the HPRP grantee in compliance?  [HPRP Notice - Section VII. Other Federal Requirements (J) Drug-Free Workplace Requirements, 24 CFR part 21] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

b. lobbying restrictions

3.

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| --- | --- | --- | --- | --- | --- |
| a. Does the HPRP grantee conduct lobbying? | |  |  | | --- | --- | |  |  | | **Yes** | **No** | |
| **Describe Basis for Conclusion:** | |
|  | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| b. If the answer to “a” above is “yes,” has the grantee correctly filed a certification and disclosure form?  [HPRP Notice - Section VII. Other Federal Requirements (I) Lobbying and Disclosure Requirements, 24 CFR part 87] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. compliance with non-discrimination, section 504 of the rehabilitation act of 1973, and other equal opportunity requirements

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If this area was reviewed, was the HPRP grantee determined to be in compliance with other applicable requirements? (Use pertinent Exhibits in Chapter 22 , such as Exhibit 22-5, and note conclusions below.)  [HPRP Notice - Section VII. Other Federal Requirements (D) Nondiscrimination and Equal Opportunity Requirements] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. lead hazard abatement requirements

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For all HPRP-rental assisted units constructed before 1978 where a pregnant woman or a family with a child under the age of six years was identified, was a visual assessment for lead-based paint conducted?  [HPRP Notice - Section VII. Other Federal Requirements (F) Lead-Based Paint Requirements, 24 CFR 35.1215(a)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For all HPRP-rental assisted units constructed before 1978 where a pregnant woman or a family with a child under the age of six years was identified and where lead-based paint was identified, were the proper regulations followed for abatement?  [HPRP Notice - Section VII. Other Federal Requirements (F) Lead-Based Paint Requirements, 24 CFR part 35, subparts A, B, M, and R] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |