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

**NOTE:** Most questions that address requirements contain the citation for the source of the requirement (statute, regulation, *Federal Register* notice, or grant agreement). However, in some instances, a controlling document (i.e., grant agreement or *Federal Register* notice) is provided without a specific citation. This is because rules can vary significantly from appropriation to appropriation, causing the grant agreements and published Notices to vary accordingly. If deficiencies are identified in these instances, HUD should ensure that program violation citations are appropriately noted. In addition, a statute or *Federal Register* Notice may only apply to certain grantees; carefully review the citation to determine its applicability. If a requirement is not met, HUD must make a finding of noncompliance. All other questions may not address requirements, but are included to assist the reviewer in understanding the grantee'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**" (24 CFR 570.900(b)(5) and 24 CFR 570.901 for entitlement and state grantees under Public Law 113-2 (paragraph 26 of March 5, 2013 Notice) and 24 CFR 570.495 for state grantees).

**Instructions:** This Exhibit applies to housing rehabilitation and reconstruction activities funded under a CDBG disaster recovery (CDBG-DR) grant award.  It 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 and 4-1.

**Questions:**

A. SCOPE OF REVIEW

1.

|  |
| --- |
| What entity is responsible for the direct administration of the program? |
|  |

2.

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

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the program include single family units, multifamily units, or both? Are units rental, owner-occupied, or both? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

4.

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

B. POLICIES AND PROCEDURES

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do written policies and procedures govern the program? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

6.

|  |  |
| --- | --- |
| In regard to ***eligibility***, do the policies and procedures require: | |
| 1. Activities to relate to the impact of the applicable disaster(s)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Activities to be located in a county that was Presidentially-declared as a major disaster? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Activities with costs reimbursable by, or for which funds are made available by, the Federal Emergency Management Agency or the Army Corps of Engineers **not** be funded with CDBG-DR funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. Activities to be CDBG-eligible? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| e. Activities to meet a national objective? If yes, list the acceptable national objective(s): | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require that all reimbursement activities are consistent with HUD guidance for charging pre-award (‘reimbursement’) costs?  [See CPD Notice 14-017, *Guidance for Charging Pre-Award Costs of Homeowners, Businesses, and Other Qualifying Entities to CDBG Disaster Recovery Grants,* as may be amended*;* applicable to grants under Public Law 113-2*.*] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 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? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Limit reimbursement activities to expenses incurred within one year after the date of the disaster, as applicable? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Ensure compliance with other federal cross-cutting requirements including Lead-Based Paint, Civil Rights, Uniform Relocation Act, and Davis Bacon, as described in the guidance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |
| --- | --- |
| Do the policies and procedures require all other sources of disaster assistance for the same purpose (see *Federal Register* notice published November 16, 2011 (76 FR 71066)) to be identified and considered to ***prevent a duplication of benefit*** (DOB), including:  [Failure to develop and maintain policies and procedures to adequately address duplication of benefits could lead to a violation of the requirement for grants under Public Law 113-2 that the grantee has “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.] | |
| 1. Insurance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Federal Emergency Management Agency (FEMA)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Small Business Administration? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. National Flood Insurance Program (NFIP)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| e. Other federal, state or local funding? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| f. Other nonprofit, private sector, or charitable funding? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require the grantee to comply with HUD’s guidance when assisting applicants that declined SBA assistance?  NOTE: This guidance is only applicable to applications processed by the grantee following the effective date of the guidance document (July 25, 2013).  [See *HUD Guidance on Duplication of Benefit Requirements and Provision of CDBG Disaster Recovery Assistance*, published July 25, 2013, as may be amended.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| At a minimum, do the grantee’s policies and procedures describe or incorporate guidelines that achieve the following for each activity file: | |
| 1. Identification of the circumstances under which applicants declined assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Establishment of why CDBG-DR assistance is appropriate for applicants? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Determination of the amount of CDGB-DR assistance that is necessary and reasonable to assist applicants in achieving recovery? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require all assisted households to enter into a signed agreement (e.g., subrogation agreement) to repay any assistance later received for the same purpose as the CDBG disaster recovery funds?  [See *Federal Register* noticepublished November 16, 2011, for applicability.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures address recapture of CDBG-DR funds (e.g., in case of an overpayment, duplication of benefit)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

12.

|  |  |
| --- | --- |
| In regard to additional requirements on ***rehabilitation and reconstruction activities,*** as applicable,do the policies and procedures require: | |
| 1. Activities to comply with green building standards?   [March 5, 2013, *Federal Register* notice; applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Prohibit rehabilitation and reconstruction assistance for a second home?  [March 5, 2013, *Federal Register* notice; applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

13.

|  |  |
| --- | --- |
| In regards torequirements related to ***activities in floodplains,*** do the policies and procedures: | |
| 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 [42 USC § 5154a(a)]? 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** | |
| c. If the answer to 12.b is “yes,” and if the activity constitutes financial assistance for acquisition or construction purposes, require owners of an assisted building or mobile home within an SFHA to obtain and maintain flood insurance?  [Applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. If the answer to 12.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? If the answer is “no,” reviewer should consult with the regional HUD Environment Officer. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| e. For residential structures financed under Public Law 113-2, if the answer to 12.b is “yes,” require substantially improved housing within an SFHA to be elevated one foot higher than the latest FEMA-issued base flood elevation? If the answer is “no,” reviewer should consult with the regional HUD Environment Officer.  [*Federal Register* Notice published April 19, 2013 (78 FR 23578); applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures include a method for determining whether applicants qualify for rehabilitation or reconstruction (e.g., what threshold of assistance triggers reconstruction)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies allow tenants to be temporarily or permanently displaced? **If “yes,” ensure that the program is reviewed by the HUD Regional Relocation Specialist.**  [49 CFR part 24] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures address monitoring funded activities (e.g., priority and/or frequency)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

C. FILE REVIEW

17.

|  |  |
| --- | --- |
| In regard to ***eligiblity***, do reviewed activity files document: | |
| 1. How the activities relate to the impact of the applicable disaster(s)?   [Applicable appropriation law and *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Activities were located in an eligible county?  [Applicable appropriation law and *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. CDBG funds for the activities did **not** supplant funds made available by the Federal Emergency Management Agency or the Army Corps of Engineers?  [Applicable appropriation law (e.g., Public Laws 110-252, 110-329, 113-2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. Activities met CDBG eligibility requirements?  [42 USC § 5305 for state grantees; 24 CFR part 570, subpart C for entitlement grantees; and applicable *Federal Register* for activities eligible by waiver for both state and entitlement grantees] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities were funded in accordance with HUD’s guidance for charging pre-award (‘reimbursement’) costs?   [Refer to Questions 6.a-c. See CPD Notice 14-017, *Guidance for Charging Pre-Award Costs of Homeowners, Businesses, and Other Qualifying Entities to CDBG Disaster Recovery Grants, as may be amended;* applicable to grants under Public Law 113-2*.*] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities were funded in accordance with the policies and procedures for the program (e.g., a grantee may only allow reconstruction for activities requiring a certain amount of CDBG-DR assistance)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

18.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In regard to ***national objective***, do reviewed activity files document that activities met or will meet an acceptable national objective (i.e., one allowed by the policies and procedures)?  [24 CFR 570.483 and 570.490, or 570.208 and 570.506, or applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

19.

|  |  |
| --- | --- |
| In regard to the ***Low- and Moderate-Income Housing* *national objective***, do reviewed activity files document: | |
| 1. For **single-family units**, households have incomes at or below 80 percent of the area median income if the activity is classified under the low- and moderate-income (LMI) national objective?   [24 CFR 570.483(b)(3) or 24 CFR 570.208(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. For **multi-family units**, if the structure contains two dwelling units, is at least one unit occupied by an LMI household?  [24 CFR 570.483(b)(3) or 24 CFR 570.208(a)(3)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. For **multi-family units**, if the structure contains more than two dwelling units, are at least 51 percent of the units occupied by LMI households? *Activities that satisfy this standard will be considered to address the Low- and Moderate Income National Objective, “unless there is substantial evidence to the contrary.”*  NOTE: Some grantees have received an alternative requirement to determine whether an assisted multifamily property can meet the LMI national objective (see applicable *Federal Register* notices). If this alternative requirement applies to the grantee, please check “n/a” in the boxes below, and list applicable *Federal Register* Notice and describe whether the grantee is adequately meeting its alternative requirement.  [24 CFR 570.483(b)(3), 24 CFR 570.208(a)(3), or applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. For **rental units**, has a period of affordability been established for assisted properties?  NOTE: Although the State CDBG regulations dictate that the LMI national objective for housing is met at *occupancy*, HUD encourages grantees to adopt and enforce periods of affordability for multifamily new construction projects. Due to the often significant investment of CDBG funds, a period of affordability can ensure housing for LMI households remains available in disaster-affected counties. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

20.

|  |  |
| --- | --- |
| In regards to the ***Slum/Blight national objective***, do reviewed activity files document: | |
| 1. The area meets the definition of a slum, blighted, deteriorated or deteriorating area under state or local law, if using the Slum/Blight national objective on an area basis?   [24 CFR 570.483 and 570.506, or 570.208 and 570.490] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. The rehabilitation *limited* to those conditions that are detrimental to public health and safety, if using the Slum/Blight national objective on a spot basis?  [24 CFR 570.483 and 570.506, or 570.208 and 570.490] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

21.

|  |  |
| --- | --- |
| In regards to the ***Urgent Need national objective***, do reviewed activity files substantiate that: | |
| 1. Urgency of the need was adequately documented to demonstrate compliance, if the grantee received a waiver of the certification requirements at 24 CFR 570.208(c) and 24 CFR 570.483(d) in an applicable *Federal Register* notice for the documentation of urgent need for a limited period of time (e.g., in the grantee’s Action Plan)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. The urgency of the need was adequately demonstrated in compliance with requirements at 24 CFR 570.208(c) and 24 CFR 570.483(d), if the waiver had expired prior to the activity or if the grantee did not receive a waiver of the certification requirements? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

22.

|  |  |
| --- | --- |
| In regard to ***duplication of benefits*** (DOB), do reviewed activity files document: | |
| 1. All sources of assistance provided to each applicant for the same purpose, and the determination of DOB?   [Stafford Act, *Federal Register* noticepublished November 16, 2011 (76 FR 71066)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. How the DOB determination impacted the applicant’s CDBG-DR award? If a DOB was found, was there a reduction in the award amount?  [Stafford Act, *Federal Register* noticepublished November 16, 2011 (76 FR 71066)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. That each applicant has entered into a signed agreement (e.g., subrogation agreement) to repay subsequent duplicative assistance?  [See *Federal Register* noticepublished November 16, 2011 (76 FR 71066), as may be amended or incorporated into a *Federal Register* notice, for applicability] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. How the grantee implemented HUD guidance when assisting applicants that declined SBA assistance?  NOTE: This guidance is only applicable to applications processed by the grantee following the effective date of the guidance document (July 25, 2013).  [Refer to Questions 9.a-c. See *HUD Guidance on Duplication of Benefit Requirements and Provision of CDBG Disaster Recovery Assistance*, published July 25, 2013, as may be amended.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If a DOB occurred after assistance was awarded, were funds recaptured in accordance with the agreement and the grantee’s policies and procedures?   [Refer to Question 10; see *Federal Register* noticepublished November 16, 2011 (76 FR 71066) for applicability] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

23.

|  |  |
| --- | --- |
| In regard to additional requirements, as applicable, do reviewed activity files document: | |
| 1. Compliance with requirements on  ***rehabilitation and reconstruction activities*** policies and procedures?   [Refer to Questions 12.a-b.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Compliance with the requirements on ***activities in floodplains***?  [Refer to Questions 13.a-e.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| In regard to ***relocation activities***, do reviewed activity files document compliance with the requirements at 24 CFR 570.606 regarding acquisition, displacement, relocation, and replacement housing? **If “no,” ensure that the program is reviewed by the HUD Regional Relocation Specialist.**  [24 CFR 570.606(f), 24 CFR 570.488] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

25.

|  |  |
| --- | --- |
| For applicable P.L. 113-2 grantees (New York, New Jersey, and New York City, NY), as designated in the CDBG-DR improper payments protocol: | |
| 1. Do reviewed files document that improper payments of CDBG-DR funds were not made (i.e., any payment that should not have been made or that was made in an incorrect amount, such as a payment to an ineligible recipient, a payment for an ineligible activity, a duplicate payment, or when documentation is not available to support a payment)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer is “no,” is the grantee taking corrective action (e.g., seeking recapture of funds resulting from an overpayment)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **For reviewed activities with an improper payment, please complete the below:**   |  |  |  |  | | --- | --- | --- | --- | | Activity name or number | Improper payment amount ($) | Type of  improper payment | Corrective action | |  |  |  |  | |  |  |  |  | |  |  |  |  | | |
| *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:** | |

26.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have reviewed activities been monitored by the grantee in accordance with its policies and procedures?  [Refer to Question 16.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. REPORTING AND OVERSIGHT

27.

|  |  |
| --- | --- |
| If the grantee is *not* administering the program, in regard to ***oversight***, is it: | |
| 1. Providing the subrecipient or subgrantee with guidance and technical assistance in a timely and effective manner?   NOTE: According to the *Federal Register* notice published March 5, 2013(78 FR 14329), “grantees are responsible for providing adequate technical assistance to subrecipients or subgrantees to ensure the timely, compliant, and effective use of funds.”  [Applicable *Federal Register* notice, or for states, Section 106(d)(2)(c)(ii) of the HCDA, if this certification is not waived] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Monitoring activities through an on-site or remote review? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Effectively collecting necessary information (e.g., performance data) from the subrecipient or subgrantee? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

28.

|  |  |
| --- | --- |
| 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:** | |

29.

|  |  |
| --- | --- |
| In regard to ***activity completion***: | |
| 1. Are activities completed in a timely fashion (in accordance with contracts and DRGR project completion dates)? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to “a” above is “no,” are contracts amended and extended before they lapse? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to “a” above is “no,” are activities assessed to determine the reason for the delay, measures that can be enacted to rectify any issues, and a realistic revised project completion deadline? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |