|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Guide for Review of Infrastructure** | | | | |
| **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 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**" (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 should be used to monitor infrastructure activities carried out with CDBG disaster recovery (CDBG-DR) funds. Generally, infrastructure activities are projects that involve the rehabilitation or construction of public facilities or public improvements. In some cases, the facilities or improvements may be designed to accomplish specific objectives related to critical infrastructure sectors (such as energy, communications, water and wastewater systems, transportation, and/or flood control). This Exhibit is divided into 4 sections: Scope of Review; Policies and Procedures; File Review; and Reporting and Oversight.

**Questions:**

A. SCOPE OF REVIEW

1.

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

2.

|  |
| --- |
| Provide a brief description of the program or activity. |
|  |
|  |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the program or activity provide CDBG-DR funds for any building used for the general conduct of government?  NOTE: Per the Housing and Community Development Act of 1974 (see 42 USC §5305(a)) , buildings for the general conduct of government are ineligible for CDBG-DR funding, unless the restriction is waived. If the restriction is waived, reviewer should cite the appropriate *Federal Register* notice(s).  [See applicable *Federal Register* notice(s).] | |  |  |  | | --- | --- | --- | |  |  |  | | **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 or activity? | |  |  |  | | --- | --- | --- | |  |  |  | | **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 the answer is “yes,” list the acceptable national objective(s): | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the program or activity include infrastructure projects funded under Public Law 113–2? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. If the answer to 7.a is “yes,” is the reviewed activity labeled a ***Covered infrastructure project*** in the Action Plan, as defined by the *Federal Register* notices published November 18, 2013 and June 3, 2014, and thus approved by HUD? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. If the project is not identified as a “covered project,” does the documentation in the grantee’s project file support a determination that the project falls outside the “covered project” definition in the *Federal Register* notices published November 18, 2013 and June 3, 2014? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

8.

|  |  |
| --- | --- |
| If the answers to question 7.a and 7.b above is “yes,” in regard to ***infrastructure requirements*** pursuant Public Law 113-2, do the policies andprocedures describe or incorporate the following requirements:  NOTE: These requirements apply to infrastructure projects financed under Public Law 113-2, following the publication of the November 18, 2013 *Federal Register* notice (78 FR 60104) and June 3, 2014 Federal Register notice (79 FR 31964). Please carefully review these notices, the notice published March 27, 2014 (79 FR 17173), and any other applicable *Federal Register* for guidance on which infrastructure projects are bound by these requirements. | |
| 1. Application of the comprehensive risk analysis it described in its Action Plan to select, prioritize, implement, and maintain infrastructure projects? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Implementation of resilience performance standards for each infrastructure project financed with CDBG-DR funds? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Use of the process outlined in the amended or approved Action Plan for the design and selection of green infrastructure projects and/or how selected projects will incorporate green infrastructure components? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Use of the transparent and inclusive decision process for the selection of ***Covered infrastructure projects*** described in the Action Plan? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Implementation of plans to monitor and evaluate the efficacy and sustainability of ***Covered infrastructure projects*** as described in the amended approved Action Plan? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the policies and procedures allow CDBG-DR funds to be used as the non-federal match for a project funded by the U.S. Army Corps of Engineers, is the amount of CDBG-DR restricted to $250,000 or less?  [42 USC § 5305] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

10.

|  |  |
| --- | --- |
| 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 have “established adequate procedures to prevent any duplication of benefits” or otherwise lead to a violation of section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.] | |
| 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** | |
| 1. Other nonprofit, private sector, or charitable funding? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the policies and procedures require all beneficiaries 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:** | |
|  | |

12.

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

13.

|  |  |
| --- | --- |
| In regard to ***business*** ***assistance standards***, do the policies and procedures require: | |
| 1. No assistance to be provided to private utilities?   [*Federal Register* Notice published March 5, 2013] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. No assistance to be provided to a small business in the liquid fuel supply chain without an award agreement that requires the business to adopt measures to mitigate the impact of disasters of the liquid fuel supply chain?  [*Federal Register* Notice published November 18, 2013 (78 FR 69108).] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

14.

|  |  |
| --- | --- |
| In regard 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 14.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 14.b is “yes,” require activities within an SFHA to be designed or modified to minimize harm to or within floodplains 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 structures (as defined in 44 CFR 9.4) financed under Public Law 113-2, if the answer to 14.b is “yes,” and if the structure is not for residential purposes, require new or substantially improved structures within an SFHA to be elevated or floodproofed 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** | |
| f. For structures (as defined in 44 CFR 9.4) financed under Public Law 113-2, if the answer to 14.b is “yes,” and if the activity is a “critical action” as definedin 24 CFR 55.2(b)(3) (e.g., structures that store flammable or toxic materials or vital records, provide utility or emergency services, or are likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during hazardous flood scenarios), require new or substantially improved structures 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:** | |
|  | |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 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

16.

|  |  |
| --- | --- |
| 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., P.L. 110-252, P.L. 110-329, P.L. 113-2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. Activities met CDBG eligibility requirements?  [Section 105 of the HCDA for states; activities eligible under 24 CFR part 570, subpart C for local governments; and the *Federal Register* for activities eligible by waiver for both] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| e. Activities were funded in accordance with the program or activity policies and procedures? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

17.

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

18.

|  |  |
| --- | --- |
| In regard to the ***Low- and Moderate-Income national objective***, do reviewed activity files document: | |
| 1. The appropriate service area, and that census tract and block group data, or survey results, for activities meeting the low- and moderate- income (LMI) area benefit national objective?   [24 CFR 570.483(b)(1)(i) or 24 CFR 570.208(a)(1)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Activity creates or retains permanent jobs, at least 51% of which, on a full time equivalent (FTE) basis, are either held by LMI persons or considered to be available to LMI persons, for activities meeting the LMI Jobs benefit national objective?  [24 CFR 570.208(a)(4)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

19.

|  |  |
| --- | --- |
| 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 570.490, or 570.208 and 570.506] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. If rehabilitation is also undertaken with CDBG-DR funds, the rehabilitation is *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:** | |
|  | |

20.

|  |  |
| --- | --- |
| In regard to the ***Urgent Need national objective***, do reviewed activity files document 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 470.483(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 470.483(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:** | |
|  | |

21.

|  |  |
| --- | --- |
| In regard to additional requirements, as applicable, do reviewed activity files document: | |
| 1. Compliance with required ***infrastructure standards*** policies and procedures?   [Refer to Questions 7 and 8.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Compliance with required ***business assistance standards*** policies and procedures?  [Refer to Question 13.a-b.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. Compliance with the requirements on ***activities in*** ***floodplains***?  [Refer to Question 14.a-f.] | |  |  |  | | --- | --- | --- | |  |  |  | | **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. 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 11; see *Federal Register* noticepublished November 16, 2011 (76 FR 71066) for applicability.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

23.

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

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have reviewed activities been monitored by the grantee in accordance with its policies and procedures?  [Refer to Question 15.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. OVERSIGHT AND REPORTING

25.

|  |  |
| --- | --- |
| If the grantee is *not* administering the program or activity, 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:** | |
|  | |

26.

|  |  |
| --- | --- |
| 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 or activity files? | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

27.

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