|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Guide for Review of Economic Development** | | | | |
| **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 economic development activities carried out with CDBG disaster recovery (CDBG-DR) funds. The Exhibit is divided into four sections: Scope of Review; Policies and Procedures; File Review; and Reporting and Oversight. As most CDBG-DR grantees receive waivers for public benefit standards applicable to economic development activities, the reviewer should consider any applicable *Federal Register* notices when responding to the questions below.

**Questions:**

A. SCOPE OF REVIEW

1.

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

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Has the Department granted a public benefit waiverfor certain economic development activities for the program under review?   [Applicable *Federal Register* notice.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Has the Department granted a waiverfor activities in support of the tourism industry for the program under review?   [Applicable *Federal Register* notice.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

3.

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

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** | |
| 1. 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** | |
| 1. 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 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** | |
| 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 to ensure expenditures are for “necessary costs” of recovery, as required by Public Law 113-2 (and other supplemental appropriations, as applicable)?  [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. Identification of the circumstances under which applicants declined assistance?   NOTE: This guidance is only applicable to applications processed by the grantee following the effective date of the guidance document (July 25, 2013). For grants in which programs were added after the *Federal Register* notice published November 16, 2011 (76 FR 71066), the requirements of that notice are applicable to applications for the added program. For grantee programs pre-dating this *Federal Register notice*, grantees must comply with section 312 of the Stafford Act and the applicable CDBG-DR appropriation statute. | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Establishment of why CDBG-DR assistance is appropriate when assisting applicants that declined SBA assistance? | |  |  |  | | --- | --- | --- | |  |  |  | | **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 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:** | |
|  | |

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 requirements on ***business*** ***assistance***, as applicable, do the policies and procedures require: | |
| 1. Grantee to conduct basic financial underwriting prior to providing assistance to a for-profit business?   [24 CFR 570.209(a), or 24 CFR 570.482(e), 24 CFR Part 570] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Assistance to be limited to small businesses?   [*Federal Register* Notice published March 5, 2013 (78 FR 14329), and applicable *Federal Register* notice; applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| c. No assistance to be provided to private utilities?  [*Federal Register* Notice published March 5, 2013 (78 FR 14329); applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. 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 future disasters of the liquid fuel supply chain?  [*Federal Register* Notice published November 18, 2013 (78 FR 69108); applicable to grants under Public Law 113-2] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| e. No assistance to be provided to any business (operating in the covered disaster area before the incident date of the applicable disaster, but now located in another state or labor market area) to encourage relocation back to the affected area?  NOTE: Except in cases in which the grantee received a waiver and modification of the job relocation clause Section 105(h) of the HCDA, 24 CFR 570.210 and 24 CFR 570.482(h) are waived for all recent CDBG-DR supplementals and for most states in older supplemental appropriations to allow a grantee to provide assistance to any business that was operating in the disaster-declared labor market area before the incident date of the applicable disaster and has since moved, in whole or in part, from the affected area to another State or to a labor market area within the same State to continue business.  [42 U.S.C. 5305(h), section 105(h) of the HCDA, 24 CFR 570.210, and 24 CFR 570.482(h), and applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

13.

|  |  |
| --- | --- |
| 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 13.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 13.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 13.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 13.b is “yes,” and if the activity is a “critical action” as defined in 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:** | |

14.

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

15.

|  |  |
| --- | --- |
| 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, and 113-2)] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| d. Activities met CDBG eligibility requirements?  [Section 105 of the HCDA for states; 24 CFR part 570, subpart C for local governments; and the *Federal Register* for activities eligible by waiver for both] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| 1. Activities were funded in accordance with HUD’s guidance for charging pre-award (‘reimbursement’) costs?   [Refer to Questions 7.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;* only applicable to Public Law 113-2 grantees*.*] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| f. Activities were funded in accordance with the policies and procedures for economic development or, if a tourism waiver was granted (refer to Question 2.a) and grantee is carrying out activities under the waiver, for such tourism activities?  [24 CFR 570.489(k) or 570.505; also see *Federal Register* notices published March 5, 2013 and May 29, 2013] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

16.

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

17.

|  |  |
| --- | --- |
| In regard to the ***Low- and Moderate-Income Jobs national objective***, do reviewed activity files document: | |
| 1. Did the grantee receive the waiver allowing it to apply individual salaries or wages-per-job, and the income limits, for a household of one?   [Applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. If the answer to “b” above is “no,” has the grantee (and/or subrecipient) demonstrated Low- and Moderate-Income (LMI) Jobs using total household income and total household size?  [24 CFR 570.483 and 570.490, or 570.208 and570.506, or applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

18.

|  |  |
| --- | --- |
| In regard 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 activity 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:** | |
|  | |

19.

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

20.

|  |  |
| --- | --- |
| In regard to the ***public benefit standard***, do the reviewed activity files document: | |
| 1. If the answer to Question 2.a above is “yes,” (dollar thresholds associated with public benefits standards have been waived, and grantee is required to report and maintain documentation), the creation and retention of :   (1) total jobs,  (2) number of jobs within certain salary ranges,  (3) average amount of assistance per job and activity or program, and  (4) the types of jobs?  [Applicable *Federal Register* notice] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. If the answer to Question 2.a above is “no,” are the public benefit standards being met?  [24 CFR 570.482(f) or 570.209 ] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |

21.

|  |  |
| --- | --- |
| 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, 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, 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 noticepublished November 16, 2011 (76 FR 71066) for applicability, as may be amended or incorporated into a Federal Register notice.] | |  |  |  | | --- | --- | --- | |  |  |  | | **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).  [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 9; see *Federal Register* noticepublished November 16, 2011 (76 FR 71066) for applicability.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

22.

|  |  |
| --- | --- |
| In regard to additional requirements, as applicable, do reviewed activity files document: | |
| 1. Compliance with the requirements on ***business assistance*** policies and procedures?   [Refer to Question 12.a-e.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| b. Compliance with the requirements on ***activities in*** ***floodplains***?  [Refer to Question 13.a-f. ] | |  |  |  | | --- | --- | --- | |  |  |  | | **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 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:** | |

24.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Have reviewed activities been monitored by the grantee in accordance with its policies and procedures?  [Refer to Question 14.] | |  |  |  | | --- | --- | --- | |  |  |  | | **Yes** | **No** | **N/A** | |
| **Describe Basis for Conclusion:** | |
|  | |

D. OVERSIGHT AND REPORTING

25.

|  |  |
| --- | --- |
| If the grantee is *not* administering the program, in regards 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 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:** | |
|  | |