

STATE OF GEORGIA
Community Development Block Grant-
Disaster Recovery Program

Monitoring Handbook

Georgia Department of Community Affairs

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Compliance Monitoring Handbook

INTRODUCTION

As part of the State's ongoing responsibilities for the administration of the U.S. Department of Housing and Urban Development's ("HUD") federally funded activities, the Georgia Department of Community Affairs ("DCA") will conduct comprehensive monitoring reviews for all activities that fall under the following Federal Register Notices:

- Vol. 83, No. 28, February 9, 2018
- Vol. 83, No. 157, August 14, 2018
- Vol. 84, No. 119, June 20, 2019
- Vol. 84, No. 169, August 30, 2019
- Vol. 85, No. 17, January 27, 2020
- Vol. 86, No. 3, January 6, 2021

These Federal Notices provide the regulatory framework established by HUD's State of Georgia Community Development Block Grant- Disaster Recovery ("CDBG-DR") Program. The State of Georgia and its subrecipients who receive these funds are required to comply with all of HUD's rules and regulations concerning activity performance.

The State of Georgia, as a grantee of the CDBG-DR funding, is responsible for ensuring that the funds are used in accordance with all applicable activity requirements. DCA understands that the use of (a) subrecipient(s) does not relieve the State of compliance responsibilities. The monitoring policies and procedures found within this Monitoring Guidebook ("Guidebook") are consistent with those used by HUD to monitor state-administered and entitlement-administered activities and are modified as appropriate to monitor specifics of the CDBG-DR and CDBG-MIT grant implemented and administered by DCA.

APPLICABILITY

This handbook applies to all federal and state requirements including, but not limited to:

- CDBG-DR and CDBG-MIT
- Environmental Review Record ("ERR") Monitoring
- Fair Housing and Equal Opportunity
- Labor Standards Administration
- Relocation and Real Property Acquisition
- Flood Insurance Protection
- 2 CFR Part 200

OBJECTIVES

HUD describes monitoring as integral management control techniques and a Government Accounting Office ("GAO") standard. It is an on-going process that assesses the quality of an activity over a period of

time. Accordingly, the monitoring process shall provide DCA with information about subrecipients that will be critical for making informed judgments regarding the CDBG-DR activity's effectiveness and management efficiency. Monitoring is also helpful in identifying occurrences of fraud, waste, and abuse. DCA will use monitoring to accomplish the following objectives:

- Ensure that all CDBG-DR and CDBG-MIT programs and activities are carried out efficiently, effectively, and in compliance with the applicable laws and regulations.
- Assist subrecipients in the improvement of their performance, development or increase in capacity, and growth of management and technical skills.
- Ensure subrecipients with project delivery responsibilities will be monitored through regular reviews and recommend appropriate compliance and/or management steps are taken to reduce compliance problems and fraud, waste, and abuse.
- Ensure compliance roles and responsibilities are clearly established across DCA and the subrecipient and that care is given to delegating authority to the subrecipient.
- Ensure subrecipients have policies and procedures and internal control systems capable of ensuring compliance.
- Ensure subrecipients maintain an effective mechanism to report any wrong-doing, including mechanisms to allow for anonymous reporting and protection against retaliation.
- Enable the state to submit appropriate and quarterly documented reports in HUD's Disaster Recovery Grant Reporting ("DRGR") System.
- Enable the state to submit quarterly financial summary reports in DRGR.

MANAGING THE MONITORING PROCESS

Monitoring will be conducted by DCA. DCA staff will operate on-site compliance monitoring of the subrecipients under the State's CDBG-DR and CDBG-MIT Activities.

CDBG-DR Staff

DCA is solely responsible for all management decisions, management functions, and management responsibilities. No other entity will be assigned, nor will they assume management functions. The activity is managed by DCA staff. Positions and responsibilities are as follows:

- **Director, Office of Community Development (In place)**
The Director will operate under the supervision of the Community Finance Division Director. The Director will coordinate and provide technical assistance and guidance to implement the federal recovery activities within the Community Finance Division. The Director leads, implements, coordinates, and advocates goals, objectives, and outcomes set by the Georgia Department of Community Affairs. The Director links all Federal, State and Local resources to deliver the most optimal objectives for all federal activity, including disaster recovery.
- **CDBG-DR Program Manager (In place)**
The Program Manager will operate under the supervision of the Director, Office of Community Development. The Program Manager directs, implements, coordinates, and advocates disaster recovery goals, objectives, and outcomes set by the State. The CDBG-DR Program Manager provides overall management, strategic operations, administrative support, and communication for the recovery effort. The -Program Manager provides executive direction to ensure efficient administrative and operational oversight of readiness and field operations. Leads the

conceptualization, development, coordination, and evaluations of policies to ensure activity coordination guidance and policies are in alignment with -CDBG-DR and CDBG-MIT Action Plans.

- **CDBG-DR Program Coordinator – (In Place)**

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Program Coordinator will be responsible for service to a complex network of Disaster Recovery related activities. The Program Coordinator will be responsible for work products and project management techniques related to CDBG-DR and CDBG-MIT activities. In addition, the position works with Subrecipients, vendors, and suppliers through the process of contract management. The Program Coordinator ensures that the highest quality of customer service is provided through the CDBG-DR office and provides administrative support with regulatory compliance, project management, and policies and procedures. This position will maintain responsibility for maintaining the State CDBG-DR website.

- **CDBG-DR Project Coordinator (In place)**

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Project Coordinator will coordinate, provide technical assistance and guidance to implement the CDBG-DR and CDBG-MIT Infrastructure activities within the Community Finance Division. The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG activity. The position will be responsible for coordinating and/or supporting the State's application/request process from application development, roll-out of the activity, administration and coordination of the activity, and closeout of the activity. The Project Coordinator will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc. and make recommendations for changes in procedures and other activities to accomplish activity objectives and timelines. The position will assist with validation of grant reimbursement requests and coordinate with appropriate staff to process/approve grant reimbursement requests. Additionally, the Project Coordinator will conduct training on disaster assistance activities and other associated topics.

- **CDBG-DR Project Specialists (3) – (In place)**

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Project Specialists will coordinate, provide technical assistance and guidance to implement the federal recovery activity within the Community Finance Division. The position's responsibilities involve the coordination of delivery of technical assistance and understanding and maintaining a detailed working knowledge of over 25 federal and state statutes. The position will work with and coordinate closely with staff in the Office of Community Development which administers the State CDBG activity. The position will be responsible for supporting the State's CDBG-DR application/request processes from application development, roll-out of the activity, administration and coordination of the activity, and closeout of the activity. The Project Specialist will monitor progress of projects and ensure timely submissions of requests for extensions, changes to scope, etc.

- **CDBG-DR Analyst – (In place)**

Under the supervision of the CDBG-DR Program Manager, the CDBG-DR Analyst provides technical support to staff within the CDBG-DR office; ensures the highest quality of customer service is provided through all delivery systems within the office; and provides administrative support in areas of compliance, project management, training and development, regulations, and policies

and procedures. The analyst will also be responsible for coordination of outreach and visualization of activity highlights.

Additional Support

- **DRGR Grants Analyst – (In place)**

The DRGR Grants Analyst will perform highly specialized work in complex data management and statistical systems, such as the Disaster Recovery Grant Reporting (DRGR) system and DCA's official grants management system, Grant Application Administration and Management (GrAAM). The DRGR Grants Analyst will prepare databases that provide up-to-date information on the CDBG-DR and CDBG-MIT activities that are underway, including funding data. This position will also conduct desk reviews of all CDBG-DR and CDBG-MIT subrecipient draw requests, including supporting documentation and recommend approval to the Director or other designee. Upon approval, the DRGR Grants Analyst will draw funds from HUD using the DRGR system.

- **CDBG Compliance Officer – (In place)**

The Compliance Officer supervises, coordinates and reviews the work of the CDBG Compliance staff and field staff and reviews applicable laws, regulations and HUD monitoring guidance and develops forms, and reports and procedures to correctly implement requirements. The Officer serves as the subject matter expert in the following areas: The Housing and Community Development Act of 1974, as amended, and implementing regulations, federal financial management regulations, national Environmental Policy Act of 1969 and implementing regulations, the National Historic Preservation Act of 1966 and implementing regulations, labor laws, e.g., the Davis Bacon Act, the Contract Work Hours and Safety Standards Act, and the Copeland "Anti-Kickback" Act, acquisition and relocation laws and regulations, e.g., The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, State of Georgia Procurement law – O.C.G.A. 36-91.

- **GIS and Research Analyst – (In place)**

The analyst will collect and interpret geographic information provided by geodetic surveys, aerial photos, and satellite data. The analyst will evaluate, measure, and record geospatial data using geographic information systems software and related hardware and software specific to the area of assignment. The analyst will create or maintain GIS databases and cartographic products. The incumbent will perform geospatial analyses of moderate complexity and present data in cartographic form. The analyst will monitor adherence to policies and procedures and locate and obtain existing geographic information databases.

- **DCA Office of Finance - (In place)**

The Finance Manager and support staff are responsible for managing both grants and contracts for agency services and monitoring compliance with contractual provisions. The office performs managerial and professional duties in accounting, budgeting, and finance. The Chief Financial Officer directs and oversees all aspects of the Finance, Procurement, and Accounting functions of the activities within the Department. This position is responsible for directing the development and establishment of policies and procedures as it pertains to finance and accounting.

- **Director of Legal Services - (In place)**

The Director of Legal Services provides legal guidance to the CDBG-MIT team on the development of disaster recovery plans, policies, and the implementation of activities.

- **Fair Housing, Section 504, ADA Coordinator - (In place)**

The role of DCA's Fair Housing/Section 504/ADA Coordinator is held by a qualified individual who serves as the agency's official Fair Housing/Section 504/ADA Coordinator in compliance with 24 CFR §8.53 and 28 CFR § 35.107. The Fair Housing/Section 504/ADA Coordinator publishes agency-adopted grievance procedures that incorporate appropriate due process standards and provides for the prompt and equitable resolution of complaints alleging any action prohibited under Section 504 or the Americans with Disabilities Act, as well as oversees the resolution of those complaints and allegations. The role and designation of DCA's Fair Housing/Section 504/ADA Coordinator is communicated to all its employees, contractors, and other agents who may be in contact with any individuals with disabilities. This position is held by DCA's Director of Legal Services.

- **Internal Auditor – (Vacant)**

The Internal Auditor will perform audits or oversee audits of financial records, electronic data processing systems, and activity activities and operations to ascertain financial status, accuracy of data, efficiency, or compliance with laws and regulations. In addition, the Internal Auditor will evaluations of the administrative, financial, and operational activities of the activity and provide required updates to HUD.

CONDUCTING THE MONITORING

All monitoring by Georgia DCA will consist of the following elements:

1. **Notification to the Subrecipient.**

After the monitoring strategy has been developed, a formal written letter to the subrecipient will be sent. Unless there are extenuating circumstances, the letter will be sent at least two weeks prior to the monitoring visit. The letter will discuss the monitoring schedule, identify the areas to be reviewed, and the names and titles of the DCA staff conducting the monitoring. It will also request that the necessary subrecipient staff be available during the monitoring. For on-site monitoring, the letter will confirm the need for any required services (i.e., conference rooms, telephones, and computers).

2. **Entrance Conference.**

The purpose of the entrance conference is to:

- a. Explain how the monitoring will be conducted;
- b. Identify and confirm key subrecipient staff that will assist during the monitoring;
- c. Set-up or confirm meeting or interview times (including any clients who may be interviewed) and, if applicable, schedule physical inspections; and
- d. Verify the activity and/or activities to be reviewed and how access to files and work areas will be granted (some activity files can be sensitive, and some work areas can be hazardous).

3. **The Assessment Process.**

Monitoring entails interviews and file reviews to verify and document compliance and performance (and can include physical inspection if monitoring is conducted on-site). DCA will utilize checklists designed to capture all appropriate information and guide the review of the monitoring. The checklists can be found throughout the later sections of this document.

- a. **Evaluate**

The monitoring checklist is designed to assess and document compliance with activity requirements based upon:

- i. File reviews to determine the accuracy of the information, using both automated and manual data and reports submitted to DCA by the subrecipient; and
- ii. Interviews with subrecipient staff and clients to clarify and determine the accuracy of the information, assess level of satisfaction with the provision of services or the “end products,” and document performance.

Specific responses to the checklist questions are required. Although this approach can take more time up-front, it yields higher quality reviews that provide a better picture of the subrecipient’s performance for CDBG-DR monitoring staff, HUD representatives, and others who have a need to review performance. The responses to each question provide important documentation for DCA’s administrative record.

DCA will use a commonsense approach and engage in a thorough evaluation of data and other information to draw defensible and supportable conclusions. DCA understands that the main objective of monitoring is to assist subrecipients in carrying out DCA’s activity responsibilities.

b. Communicate

Throughout the monitoring, DCA will maintain an on-going dialogue with the subrecipient. This communication will keep the subrecipient informed as to how the monitoring is progressing and enables discussions of any problem areas encountered. It also minimizes the potential for surprises to the subrecipient when the exit conference is held as well, when the monitoring results are formally communicated in writing.

c. Document

The responses to the questions in the monitoring checklists form the basis for the monitoring conclusions and are supplemented by subrecipient records copied or reviewed during the monitoring. All checklist questions will be clearly answered (both the “Yes/No/Not Applicable” boxes and the “Describe Basis for Conclusion” text box). For example, a Not Applicable (“N/A”) response could indicate either that the question did not apply, or the reviewer was unable to answer it due to time constraints, unexpected problems in other areas, etc. The “Describe Basis for Conclusion” section needs to succinctly but explicitly explain this.

4. Exit Conference.

At the end of the monitoring review, DCA will conduct an exit conference with the appropriate subrecipient officials or staff to discuss preliminary conclusions. In part, this serves to confirm the accuracy and completeness of the information used to form the basis for the monitoring conclusions. It may also highlight areas of disagreement between DCA and the subrecipient. DCA is responsible for using the checklist not only to prepare for the exit conference by clearly and concisely summarizing the conclusions, but also to document the issues discussed at the exit conference, the date and time of the meeting, and the names and titles of the attendees. To the extent that a subrecipient signifies disagreement, the basis for any objections should be noted. These summarizations are used by DCA to develop the monitoring letter.

MONITORING CONCLUSIONS

Decision Categories

As a result of monitoring, DCA will reach one or more conclusions that:

- Performance was adequate or exemplary,
- There were significant achievements,
- There were concerns that need to be brought to the attention of the subrecipient,
- Technical assistance was provided or is needed, and/or
- There were findings that require corrective actions.

All conclusions, positive or negative, must be supportable, defensible, and adequately documented.

Findings and Concerns

Where deficiencies are identified, the following procedures apply:

1. **Findings.** Where an identified deficiency results in a finding, the finding must include the condition, criteria, cause, effect, and required corrective action.
 - a. The **condition** describes what was wrong or what the problem was.
 - b. The **criteria** cite the regulatory or statutory requirements that were not met.
 - c. The **cause** explains why the condition occurred.
 - d. The **effect** describes what happened because of the condition.
 - e. The **corrective action** identifies the action(s) needed to resolve the problem, and, unless inapplicable or there are extenuating circumstances, should include the time frame by which the participant is to respond to the finding.
2. **Concerns.** Monitoring concerns brought to the subrecipient's attention should include the condition, cause, and effect. DCA staff will suggest or recommend actions that the subrecipient can take to address a concern, based on sound management principles or other guidelines. However, corrective actions are not required for concerns.

SANCTIONS

The Process

Identified activity deficiencies that rise to the level of a "finding" require corrective action. Responsibility rests both with DCA staff and the subrecipient being monitored. DCA staff must validate that there is sufficient documented information and/or evidence to support a finding of noncompliance. The subrecipient being monitored has a responsibility to determine or assist DCA staff in determining the reason why a requirement was violated or provide evidence of compliance if there is a discrepancy about the conclusion between the grantee and subrecipient.

A key ingredient of effective monitoring is the ability to identify the root cause(s) of any identified deficiencies and whether the problem is an isolated occurrence or a systemic issue. Such knowledge leads to the development of optimal corrective actions. Keep in mind that there may be any number of acceptable solutions to resolve a deficiency. Ideally, the subrecipient should agree with DCA's assessment of the cause and offer a workable solution. In some cases, DCA staff may need to determine appropriate action if compliance is not possible (i.e., should money be recovered, a grant reduced, limited, or terminated?). Contemplation of those or other serious corrective actions triggers the need for DCA to

contact the local HUD Office. Additionally, suspected instances of fraud or misconduct maybe referred to the HUD Office of the Inspector General for further investigation as appropriate.

Understanding the cause serves to outline the action or actions needed to resolve the violation(s). To assist DCA staff in developing corrective actions for findings of noncompliance, DCA's discretion for resolving deficiencies lies within these parameters. An important and fundamental principle of the monitoring process is that DCA is required to make findings when there is evidence that a statute, regulation, or requirement has been violated, but it retains discretion in identifying appropriate corrective action(s) to resolve deficiencies. An equally fundamental principle is that activity participants have due process rights to contest findings.

Monitoring Letter

Within 45 days after completion of monitoring, DCA will send written correspondence to the subrecipient describing the results in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter is to include:

- The activity and the subrecipient being monitored;
- The dates of the monitoring;
- The name(s) and title(s) of the DCA staff who performed the monitoring review,
- A listing of the activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant);
- If applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (i.e., time constraints, unanticipated problems arising in other areas, etc.);
- Monitoring conclusions;
- If applicable, clearly labeled findings and concerns;
- If there are findings, an opportunity for the subrecipient to demonstrate, within a time prescribed by DCA, that the subrecipient has, in fact, complied with the requirements;
- Response time frames, if needed; and
- An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring visit.

Because DCA works in partnership with its subrecipients, generally, the tone of the monitoring letter will be positive and constructive, in recognition of the common goal to implement the CDBG-DR activity responsibly and effectively. DCA's monitoring letter will not include general statements that the subrecipient "Complied with all applicable rules and regulations." Such broad general statements can negate DCA's ability to apply sanctions, if deemed necessary at a later date. Monitoring conclusions, therefore, should be qualified (i.e., based upon the materials reviewed and the staff interviews and the compliance of the activity/area with specific requirements).

CLOSING FINDINGS

General

Follow-up by DCA staff serves two purposes:

1. It provides an opportunity to evaluate effectiveness of monitoring efforts in maintaining or improving subrecipient performance, and

2. It enables DCA to determine that required corrective actions have been implemented by the subrecipient.

DCA considers the monitoring process to be completed only after an identified deficiency has been corrected, the corrective action produces improvements, and it is determined that management action is not needed.

Follow-up

All follow-up actions will be documented and communicated to the monitored subrecipient(s). Target dates are assigned when corrective actions are required and relayed to the subrecipient in the monitoring letter.

In the event that the subrecipient fails to meet a target date and has not alerted DCA as to the reason for not meeting such date, DCA staff will follow-up either email, with a reminder.

If the subrecipient has not responded within 7 days after the date of the reminder from DCA, a letter will be sent to the subrecipient requesting the status of the corrective action(s) and warning the subrecipient of the possible consequences (under the applicable activity requirements) of a failure to comply. Where the subrecipient is unresponsive or uncooperative, DCA will contact the local HUD office for guidance on carrying out progressive sanctions.

When the subrecipient notifies DCA that the corrective actions have been implemented, the appropriate staff will review the submitted information within 30 business days. Regardless of whether the response is acceptable and/or sufficient to close a monitoring finding or inadequate, a letter will be sent to the subrecipient within 45 calendar days of receipt of its submission. The correspondence will either inform the subrecipient that a finding has been closed; acknowledge any interim actions that have been taken and reaffirm an existing date; or state that additional information and/or action is needed and establish a new target date to resolve the deficiency. When determining whether it is reasonable or appropriate to establish new target dates, DCA will consider the subrecipient's good-faith efforts, as well as any extenuating circumstances beyond the subrecipient's control that impact timely and effective resolution.

BUILDING THE ADMINISTRATIVE RECORD

The administrative record will include all documents considered, either directly or indirectly, by DCA in reaching a final decision on an issue. Documents can include contracts, forms, agreements, internal memoranda and notes, correspondence, email, electronic submissions, and any other document considered by DCA in reaching a decision. It can be used by DCA to take enforcement actions, such as to reduce or terminate a subrecipient's grant. Once the final decision is made, the administrative record cannot be supplemented with subsequent documents.

Correspondence containing administrative decisions requires special attention. When DCA makes a finding, a request for corrective action is being conveyed, or DCA is saying "no" to a request, the letter conveying the decision or action needs will show an understanding of the nature of the issue and explain DCA's reasoning.

Adverse actions must cite the authority (i.e., the applicable regulation or statutory provision) or contract provisions. DCA will avoid characterizations or personal opinions in written correspondence, whether letters, emails, or internal memorandums. DCA will answer all correspondence within a reasonable

amount of time after received. Demands or requests that are made of subrecipients must be reasonable and it must be possible to complete required actions within the time allotted. All attachments will be retained to incoming or outgoing correspondence. All dates, signatures, and concurrences will be clearly legible.

Telephone calls will be returned promptly. Notes will be taken of such calls, including the date of the call, the names of the people who participated in the call, and the substance of the conversations. For non-documentary materials, such as pictures, videotapes, recordings of interviews, etc., DCA staff will need to identify and record date, place, and names or narrators (if applicable).

1. Environmental Review

PURPOSE

The purpose of the environmental review process is to analyze the effect a proposed activity will have on the people and the natural environment within a designated target area and the effect the material and social environment may have on an activity.

Depending on the activity and form of implementation being used, either the subrecipient or the grantee are considered the responsible entities and must complete an environmental review of all project activities prior to obligating CDBG-DR funds. This requirement also applies to projects funded with CDBG-DR generated Program Income (PI). HUD rules and regulations that govern the environmental review process can be found at 24 CFR Part 58.

There are many federal and state environmental protection laws and regulations to consider when planning and implementing CDBG-DR and CDBG-MIT funded projects. It is important to note that compliance is often required for all funding sources, public and private, and for all components of an entire project. Applicants must comply with the National Environmental Policies Act of 1969 (“NEPA”) and HUD regulations implementing NEPA titled, “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities” (24 CFR Part 58).

All CDBG-DR and CDBG-MIT activities must take certain actions to comply with this regulation before committing funds for any activities that involve choice-limiting actions. A choice-limiting action is any action in which HUD funds are expended or committed for activities that reduce or eliminate the ability for the subrecipient or grantee to choose alternatives.

There are five levels of environmental classifications that an activity or activity may fall under, which are listed below. For further detail regarding these classifications and how to determine which one an activity might fall under, please refer to 24 CFR Part 58.

1. **Exempt Activities.** Certain activities are by their nature highly unlikely to have any direct impact on the environment. Accordingly, these activities are not subject to most of the procedural requirements of environmental review. If an activity is determined to be exempt, the responsible entity is required to document, in writing, that the project is exempt and meets the conditions for exemption spelled out in 24 CFR 58.34
2. **Categorically Excluded Activities Not Subject to 24 CFR 58.5.** Some activities are categorically excluded from NEPA requirements and are not subject to 24 CFR 58.5 compliance determinations. To complete environmental requirements for Categorically Excluded projects not Subject to 24 CFR Part § 58.5, the responsible entity must take the following steps:
 1. Make a finding of categorical exclusion not subject to 24 CFR 58.5 and put in the Environmental Review Record (“ERR”)
 2. Carry out any applicable requirements of 24 CFR 58.6 and document in the ERR as appropriate.
3. **Categorically Excluded Activities Subject to 24 CFR 58.5.** The list of categorically excluded activities is found at 24 CFR Part 58.35. While the activities listed in 58.35(a) are categorically

excluded from NEPA requirements, the state must nevertheless demonstrate compliance with the laws, authorities and Executive Orders listed in 58.5.

4. **Activities Requiring Environmental Assessment.** Activities which are neither exempt nor categorically excluded (under either category) will require an environmental assessment (EA) documenting compliance with NEPA, HUD and with the environmental requirements of other applicable Federal laws.
5. **Activities Requiring an Environmental Impact Statement.** An Environmental Impact Statement (“EIS”) details the grantee’s final analyses and conclusions, according to NEPA, related to potential significant environmental impact of the project. Responsible Entities must follow prescribed steps during preparation, filing and review of an Environmental Impact Statement (See 24 CFR 58, Subpart G, and 40 CFR 1500-1508). An EIS may be required when:
 - a. The project is so large that it triggers density thresholds, and common sense suggests it may have a substantial environmental impact.
 - b. A Finding of Significant Impact (“FOSI”) is found as a result of completing an environmental assessment for the project.
 - c. Any project to provide a site or sites for hospitals and nursing homes with a total of at least 2,500 beds.
 - d. Any project to remove, destroy, convert or substantially rehabilitate at least 2,500 existing housing units.
 - e. Any project to construct, install or provide sites for at least 2,500 housing units.
 - f. Any project to provide water and sewer capacity for at least 2,500 housing units.
 - g. Any project that exceeds the 2,500-unit threshold for nonresidential housing construction.

To complete the Environmental Review process in an efficient manner, DCA may utilize the tiered environmental review approach. The goal of tiering is to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review.

The Tiered Environmental Review consist of two stages:

1. **The Broad-Level Review (TIER 1), Responsible Entity: DCA**

During this process, DCA will identify and evaluate the issues that can be fully addressed and resolved, notwithstanding possible limited knowledge of the activity. Following the Broad Level Review, DCA will publish a Notice of Intent to Request the Release of Funds (NOI/RROF). After the public comment period and objection period, DCA will formally Request the Release of Funds from HUD.
2. **Site Specific Reviews (TIER 2), Responsible Entity: Subrecipient** the site of an individual activity is identified, the local government, or qualified contractor, must complete the site-specific review. This review should not repeat the completed analysis and decisions of the Tier 1 review but should concentrate on the issues that were not resolved (see 40 CFR 1508.28). Using the protocols established in the Tier II strategy, the site-specific review must determine and document the activity’s adherence to all established protocols and remaining requirements as defined in the broad-level review.

Note: An Environmental Review for an Activity that is Exempt or Categorically Excluded, not subject to Section 58.5 Pursuant to 24 CFR Part 58.34(a), must be completed and submitted to DCA prior to request for funds.

ENVIRONMENTAL REVIEW CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity or Activity	
Grant Manager	
Date of Review	

1.

Is there an existing, signed Subrecipient Agreement (“SRA”) or contract between DCA and the subrecipient or vendor, which clearly designates Environmental Review responsibilities for the activity?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

Please check the level of Environmental determination that was made for the activity.	
Exempt	<input type="checkbox"/>
Categorically Excluded	<input type="checkbox"/>
Environmental Assessment- Finding of No Significant Impact	<input type="checkbox"/>
Environmental Impact Statement Issued	<input type="checkbox"/>
Describe basis for conclusion:	

3.

Have there been any changes in the project’s description since the initial environmental review was completed?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

4.

If the answer above is “yes,” were the changes significant enough to change the original level of environmental determination?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

If mitigation measures (i.e., lead-based paint, asbestos, etc.) were required for the activity during the time period reviewed, were the measures included in the ERR as part of the actions pertaining to the environmental review?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

For the records reviewed, if applicable, does the subrecipient’s records show that no funds were obligated or spent prior to DCA’s issuing a Request for a Release of Funds (“RROF”)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2. Financial Management

PURPOSE

The financial management and administration of the CDBG-DR or CDBG-MIT Activity is generally regulated by DCA's *Standard Operating Procedures*, activity manuals provided to the subrecipient, 2 CFR Part 200 Subparts C and F (Audit Requirements), and any federal or state regulations cited therein. In addition, state audit requirements must be met.

The financial system of the subrecipient should be able to produce the various financial and compliance reports required for efficient implementation of grant funding. Financial reports (draw requests) are to be submitted through DCA's grants management system, eCivis, along with appropriate supporting documentation. If technical difficulties prevent users from completing financial reports (i.e., draw requests) online, please contact Trina Preston-Dansbury, CDBG-DR Grants Analyst at Trina.Dansbury@dca.ga.gov ..

Quarterly Progress Reports (QPRs) will be due to DCA via eCivis on the 20th of every month following the close of the quarter. QPRs are to be submitted to the eCivis portal at <https://gn.ecivis.com/>. Below is an example of a QPR schedule:

Quarter 1: QPR due April 20th

Quarter 2: QPR due July 20th

Quarter 3: QPR due October 20th

Quarter 4: QPR due January 20th

Note: No reimbursement requests will be authorized by DCA if one or more of the QPRs are delinquent.

MONITORING

Subrecipients must have financial management systems, including records documenting compliance with CDBG-DR or CDBG-MIT statutes, regulations, and the terms and conditions of the CDBG-DR or CDBG-MIT award, must be sufficient to permit the preparation of reports required by general and activity-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the grant requirements.

DCA uses several tools to assess subrecipients' past and current performance. On-site monitoring visits, off-site reviews, and audits ensure that activity funds are being used properly. These reviews also determine whether a subrecipients implementation activities comply with CDBG-DR or CDBG-MIT activity goals and regulations.

On site monitoring visits provide DCA with an opportunity to assess current subrecipients performance. During visits, DCA will review activity records and meet with subrecipient staff.

INTERVIEW ATTENDEES

- Designated official(s) of subrecipient entity or implementation vendor
- Subrecipient or implementation vendor finance manager and appropriate staff
- Construction manager and appropriate staff (if applicable)

- Others as determined appropriate by DCA or the subrecipient

SELECTION OF CASE FILES TO BE REVIEWED

The following sections outline the basic criteria for selecting which areas to be reviewed and provide guidance for determining which specific files in an area should comprise the review sample for the monitored activity or activity.

The review sample must be large enough to be representative of the size and nature of the activity or activity and should be adjusted to reflect the reviewer's knowledge of subrecipient performance and the other factors listed below. Generally, the cases shall be selected at random and cover the period since the last monitoring review, if applicable. Emphasis should be placed on more recent activities, which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new activity, the reviewer should select a representative sample of all cases since the beginning of the activity.

Examples of documentation to be reviewed are listed as follows:

- Grant agreement;
- Letters attesting to leverage commitment;
- Tracking of leverage commitments indicating how much has been used;
- Activity outreach materials for potential participants;
- Outreach and meeting materials;
- Applicant files (intake form, written notes, , assessments, case notes, copies of service referrals, documentation of adverse actions, etc.);
- Financial files (expenses and corresponding invoices for salaries, training, and administrative-type activities);

Basic Criteria.

Factors to be considered when selecting a file for review:

- Number and type of CDBG-DR or CDBG-MIT activities being administered by the specific subrecipient or vendor being monitored.
- Date of last financial management monitoring review. Unless monitoring is targeted to addressing potential issues raised through complaints or other mechanisms, activities least recently and/or never reviewed should receive priority.
- Size and complexity of the subrecipient or vendor's CDBG-DR activity workload
- Experience and training of subrecipient or vendor's finance staff
- The seriousness of any previous monitoring findings, including activity monitoring that resulted in DCA staff determining that a monitoring of the subrecipient or vendor's financial activities was necessary

REVIEWING CASE FILES

The review shall complete all applicable sections of the checklist for each case review. The checklist should be used to assist DCA staff in thoroughly examining the subrecipient or vendor's records and files for each of the cases in the selected sample and determine whether financial transactions were

compliant with state and federal regulations. If feasible, following the case file review, a representative sample of persons should be interviewed.

INTERVIEWS

The following factors should be used to determine whether personal interviews are warranted as part of the review:

- Documentation in the case file is not sufficient to permit DCA staff to clearly judge whether the subrecipient or vendor, or an actor of either, was compliant with DCA and HUD policies and procedures and regulations.
- Personal interviews are determined to be necessary in consultation with the relevant DCA leadership

When conducted, interviews should be face-to-face, when feasible. Alternative formats should be used to accommodate any person needing or requesting a reasonable accommodation. Interpretive services are to be arranged for any persons who have limited English proficiency (“LEP”).

Before interviewing subrecipient or vendor personnel, DCA staff must inform the interviewee that all interviews are voluntary and ensure that the person understands the decision to respond to a question is entirely voluntary. No penalty will result from a decision to respond or not respond.

FINANCIAL MANAGEMENT CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

BUDGET CONTROL

1.

Does the subrecipient record the amount(s) budgeted for eligible activity or activity?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

	Yes	No	N/A
--	-----	----	-----

Does the subrecipient record an encumbrance/obligation when contracts are executed, purchase orders issued, etc.?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

ACCOUNTING RECORDS

3.

Does the subrecipient identify expenditures in its accounting records according to eligible activity classifications specified in the statute, regulations, or subrecipient agreement that clearly identify the use of CDBG-DR/MIT funds for eligible activities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

4.

Do the subrecipient’s policies and procedures describe record creation, maintenance, and retention requirements that describe how the subrecipient will maintain source documentation to support the financial management system records?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

Do the subrecipient’s policies and procedures require that records pertaining to obligations, expenditures, and drawdowns will be able to relate financial transactions to either the CDBG-DR/MIT grant funding or to Program Income?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

FINANCIAL MANAGEMENT SYSTEM

6.

Has the Subrecipient, if applicable, maintained a properly segregated account of CDBG-DR/MIT funds from other funds which document revenues and expenditures associated with the project or have an accounting system sufficient to account for commingling of funds?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

7.

Does the subrecipient's financial management system provide for a comparison of expenditures to the budget amounts for the CDBG-DR/MIT award?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

8.

Does the subrecipient record in its financial management system an obligation when contracts are executed, purchase orders issued, etc.?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

9.

	Yes	No	N/A
--	-----	----	-----

Do the subrecipient's policies and procedures and/or financial management system show that records will be sufficient to permit the preparation of mandatory reports that the grantee is required to submit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

10.

Did the record review indicate any instances of ineligible expenditures?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CASH MANAGEMENT

11.

If the subrecipient advances grant funds to its contractor(s), does the subrecipient have procedures to minimize the time elapsed between the transfer of funds to, and disbursement by, the subrecipients?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

ALLOWABLE COSTS

12.

After reviewing the chosen samples of expenditures, is DCA able to determine they were necessary and reasonable for proper and efficient administration of the activity? (Check all that apply)	
Salaries and related costs	<input type="checkbox"/>
Professional service contracts (i.e., legal, accounting, auditing, and consulting)	<input type="checkbox"/>
Travel expenditures	<input type="checkbox"/>
Other activity delivery costs	<input type="checkbox"/>

Describe basis for conclusion:

13.

Do any of the reviewed expenses include unallowable costs? (i.e., entertainment; contributions; fines and penalties; general governmental expenditures including salary and expenses of the chief executive officer of the subrecipient)	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

14.

If deficiencies were noted in the previous two questions above, does your review indicate that the problems are isolated? If no, please provide further detail in the basis for conclusion.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

15.

After reviewing the samples, were costs charged to the grant activity after subtraction of all applicable credits?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SUBRECIPIENT ACTIVITY DELIVERY CHARGES

12.

Are charges to the CDBG-DR/MIT activity for salaries and wages, whether treated as direct or indirect costs, based on payrolls documented in accordance with the generally accepted practice of the subrecipient and approved by the responsible official(s) of the subrecipient?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

FOR GOVERNMENTAL SUBRECIPIENTS

13.

For employees working solely on the CDBG-DR/MIT activity, are charges for their salaries and wages supported by periodic certifications that the employees worked solely on that activity for the period covered by the certification?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

14.

Were the certifications prepared at least semi-annually and signed by the employee or a supervisory official having first-hand knowledge of the work performed by the employee?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

FOR NON-GOVERNMENTAL SUBRECIPIENTS OR GOVERNMENTAL PERSONNEL NOT WORKING FULL-TIME ON CDBG-DR

15.

	Yes	No	N/A
--	-----	----	-----

Do the personnel time records account for all the employees' time and activities and not just the CDBG-DR/MIT time charged?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

INDIRECT COSTS

16.

Are indirect costs charged to the activity?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

17.

If the answer to the question above is "yes," what method is being used?	
Ten Percent de Minimis	<input type="checkbox"/>
Cost Allocation Plan	<input type="checkbox"/>
Indirect Cost Rate	<input type="checkbox"/>
Direct Allocation Method	<input type="checkbox"/>
Describe basis for conclusion:	

18.

Are indirect costs billed in accordance with an approved method?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

INTERNAL CONTROLS

19.

Review the Subrecipient's system for pay authorizations, processing invoices for approval and payment to include who approves payment requests, who prepares checks, and who signs checks. Is the process adequate?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

20.

Does the Subrecipient have an organization chart that sets forth the actual lines of responsibility?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

21.

Are duties for key employees of the Subrecipient defined?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

22.

Has the subrecipient obtained fidelity bond coverage for responsible officials?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

23.

	Yes	No	N/A
--	-----	----	-----

Does the subrecipient's chart of accounts include a complete listing of the account numbers used to support the control needed to ensure that resources used do not exceed resources authorized?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

24.

Do the subrecipient's approval controls provide reasonable assurance that appropriate individuals approve recorded transactions in accordance with management's general or specific criteria?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

25.

Do the subrecipient's controls over the design and use of documents and records provide reasonable assurance that transactions and events are properly documented, recorded, and auditable?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

26.

Does the subrecipient's segregation of duties controls effectively reduce the opportunity for someone to perpetrate or conceal errors or irregularities in the normal course of duties?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

27.

Do the subrecipient's internal control procedures support its ability to prepare financial statements that are fairly presented in conformity with generally accepted or other relevant and appropriate accounting principles and regulatory requirements?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SOURCE DOCUMENTATION

28.

Does the Subrecipient, and if applicable, the Subrecipient's file contain appropriate supporting documentation for CDBG-DR/MIT Financial Report (i.e., draw down requests)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Describe basis for conclusion:			

29.

Does the Subrecipient maintain adequate source documentation?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

30.

To determine compliance, select a sample of expenditures and determine whether they are supported by invoices, contracts, or purchase orders, etc. Please attach four (4) examples of expenditures reviewed to this checklist.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2 CFR PART 200: AUDIT OF STATES, LOCAL GOVERNMENTS, AND NON-PROFIT ORGANIZATIONS

32.

If an audit was required, were there any deficiencies/findings noted in the most recent audit completed? If yes, describe deficiency in the basis for conclusion.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

33.

Does the subrecipient's audit report include an opinion on whether the financial statements are presented fairly in all material respects in conformity with generally accepted account principles (GAAP) and whether the schedule of expenditures is presented fairly in all material respects?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

34.

Do the subrecipient's financial statements reflect its financial position, results of operations or changes in net assets and, where appropriate, cash flows for the fiscal year?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3. Procurement

PURPOSE

In accordance with 24 CFR 570.489(g), DCA has chosen to follow its own procurement policies and procedures, as established by the State of Georgia. For subrecipients policies and procedures have been established to ensure full and open competition in the procurement of goods and services when CDBG-DR or CDBG-MIT funds are used, in whole or part, for the implementation of CDBG-DR or CDBG-MIT activities at the local level. These policies and procedures are available at:

<https://www.dca.ga.gov/node/7496> .

DCA's CDBG-DR procurement policies and procedures implement the requirements of 24 CFR 570.489(g) for its subrecipients including:

- Full and open competition
- Identification of Methods of Procurement and their applicability
- Prohibition of cost plus a percentage of cost and percentage of construction costs methods
- Assurance that all purchase orders and contracts include any clauses required by Federal statutes,
- Executive orders, and implementing regulations
- Subrecipient and contractor determinations shall be made in accordance with the standards in 2
- CFR 200.330.
- Standards of conduct governing employees engaged in the selection, award or administration of state contracts. Standards for state employees can be found at: Georgia Procurement Manual, Department of Administrative Services, Section I.4.4 Ethical and Professional Conduct, Published May 2018.

Procurement will vary across the different categories of CDBG-DR and CDBG-MIT activities. For example, DCA's 2017 CDBG-DR Homeowner Rehabilitation and Reconstruction Activity ("HRRP") was developed using a subrecipient model, in which subrecipients, with oversight provided by DCA, procured contractor(s) to conduct intake, case management, and construction activities. However, the 2018 CDBG-DR Homeowner Rehabilitation and Reconstruction Activity will use an implementation contractor model, in which DCA will procure a prime vendor to implement the activity and independently procure the needed sub-contractors. Despite this variance, all entities using CDBG-DR or CDBG-MIT funds are required to adhere to the same procurement policies.

Different categories of CDBG-DR and CDBG-MIT funded activities will require procurement for varying types of contractors as well. For example, procurement of engineers, architects, and grant administrators for are common for infrastructure activities, along with general and construction contractors.

PRE-MONITORING PREPARATION

DCA staff are responsible for being thoroughly familiar with all federal and state regulations pertinent to the procurement process in CDBG-DR and CDBG-MIT activities. Staff should refer to relevant federal register notices as well as 24 CFR 570.489 (g), the CDBG-DR Procurement Policy, and the Georgia Procurement Manual as developed by the Georgia Department of Administrative Services.

Staff should also maintain all procurement documents required for submission by the subrecipient/vendor for the life of the grant being expended. These documents include, but are not limited to:

- Advertisements,
- Contractor scores and selection justification,
- Local government meeting minutes,
- Contracts and agreements, and
- Invoices

MONITORING PROCESS OF PROCUREMENT PRACTICES

DCA staff should request to review at least two expenditures from each procurement category. In the event the subrecipient or vendor does not have expenditures in certain categories or does not have two expenditures in any given category, DCA staff should make note.

PROCUREMENT CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

CONTRACT ADMINISTRATION

1.

Does the subrecipient have a system of contract administration for determining the adequacy of contractors' performance?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

Does the subrecipient have a written code of conduct governing employees, officers or agents engaged in the award and administration of contracts supported by grant funds?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3.

Does the subrecipient use prequalified lists?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, are such lists current?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Were they developed through an open solicitation process without overly restrictive criteria and include an adequate number of qualified sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

4.

Has the subrecipient made subawards?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

If subawards have been made, how does the subrecipient show that its contracts are required to follow applicable procurement policies and procedures in the administration of their contracts and purchase orders?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

For the procurement transactions selected for review, is there documentation showing compliance with DCA's CDBG-DR procurement guidance and policies?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

7.

What kind of contract is being utilized?	
Fixed Price	<input type="checkbox"/>
Cost Reimbursement	<input type="checkbox"/>
Time and Materials/Labor Hours	<input type="checkbox"/>

Describe basis for conclusion:

8.

What was the basis for contractor selection or rejection? (Check all that apply)	
Lowest Price/Cost	<input type="checkbox"/>
Qualifications and Cost	<input type="checkbox"/>
Other	<input type="checkbox"/>
Describe basis for conclusion:	

9.

What was the basis for the cost or price of the contract?	
Lump Sum	<input type="checkbox"/>
Unit Price	<input type="checkbox"/>
Payment Upon Completion	<input type="checkbox"/>
Progress Payments	<input type="checkbox"/>
Reimbursable Costs	<input type="checkbox"/>
Describe basis for conclusion:	

CONTRACTOR AWARDS

10.

Is the Subrecipient ensuring that its awards are not made to any party excluded, disqualified "or otherwise ineligible (e.g., suspension, debarment, or limited denial of participation) for Federal procurement and non-procurement activities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

11.

Is there any evidence to indicate that the subrecipient awarded noncompetitive contracts to consultants that are on retainer contracts or any other arbitrary actions?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

12.

Did the Subrecipient take any of the following steps to use small, minority-owned and women-owned businesses?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. including such businesses on solicitation lists whenever they are potential sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. ensuring that such businesses, when identified, are solicited whenever they are potential sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. dividing procurement requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. requiring prime contractors when subcontracts are let, to take affirmative steps to select small, minority-owned and women-owned businesses in grant-funded contracts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

13.

If the subrecipient is not taking the steps identified in the question above, list the actions the subrecipient is taking to meet requirements that affirmative steps be taken to assure use of small, minority-owned and women- owned businesses when possible?

14.

Were any contracts based on a cost-plus-a-percentage-of-cost method?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

15.

Was a cost or price analysis performed in connection with every procurement action, including contract modifications?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

16.

Is profit negotiated as a separate element of price where price competition is lacking, or a cost analysis is performed?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SMALL PURCHASES

17.

Can the subrecipient document receipt of an adequate number of price or rate quotations from qualified sources for procurements of \$250,000 or less?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SEALED BIDS

18.

Summarize the Subrecipient’s formal seal bid process. Does it follow the State Competitive Bidding Act?

19.

Does the subrecipient receive at least three or more responsible bids for each procurement transaction?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

20.

If the answer to the above question is “no,” is this a systemic failure (i.e., the subrecipient’s system failed to work properly) or does it appear to be isolated failures in some cases?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

21.

Do the procurement transactions lend themselves to firm, fixed price contracts and can selection of known suppliers, be made principally on the basis of price?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

22.

Was the Invitation for Bids (“IFB”) publicly advertised and were bids solicited from an adequate number providing them sufficient time before the date set for opening the bids?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

23.

Does the RFP, including specifications and pertinent attachments, clearly define the items or services?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

24.

Were all bids opened publicly at the time and place stated in the RFP?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

25.

Were the contracts awarded to the lowest responsive and responsible bidders?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

COMPETITIVE PROPOSALS

26.

Is this procurement method used generally when conditions are not appropriate for the use of sealed bids?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

27.

Do the Requests for Proposals (RFPs) clearly and accurately state the technical requirements for the goods or services to be procured?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

28.

Are the proposals solicited from an adequate number of qualified sources, consistent with the nature and requirements of the procurement?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

29.

Does the Subrecipient publicize the RFPs and honor reasonable requests by parties to compete to the maximum extent practicable?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

30.

Do the RFPs identify all significant evaluation factors, including price or cost where required, and their relative importance?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

31.

Does the subrecipient conduct technical evaluations of submitted proposals?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

32.

If the answer to the above question is "yes," does the subrecipient determine responsible bidders from such evaluations?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

33.

Does the subrecipient, as necessary, conduct negotiations, written or oral, for final contract award?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

34.

Does the subrecipient make awards to the most responsive and responsible bidders whose proposals will be the most advantageous to the subrecipient after price and other factors are considered?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

35.

If proposals involving engineering/architectural professional services are evaluated with respect to factors other than price, can the subrecipient document the basis for negotiation of fair and "reasonable compensation?"	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

36.

For procurement of architectural and engineering professional services, does the subrecipient maintain a list of qualified bidders who can respond to its RFPs?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

NON-COMPETITIVE PROPOSALS (SOLE SOURCE)

37.

If noncompetitive proposals were used, can the Subrecipient show that other methods of procurement (small purchases, sealed bids, formal advertising, or competitive proposals) were infeasible because:	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. the item was only available from a single source	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b. a public exigency or emergency is of such urgency to not permit a delay resulting "from competitive solicitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. after solicitation of a number of sources, competition is determined inadequate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. DCA granted approval?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CONTRACT AND PAYMENTS

38.

Are purchase orders and contracts signed by an authorized activity official?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

39.

Are items delivered and paid for consistent with the items contained in the corresponding purchase order and/or contract?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

40.

If contracts have been awarded for construction or facility improvements that are valued at or below \$100,000, does the subrecipient follow the state's requirements relating to:	Yes	No	N/A
a. Construction bid guarantees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Performance bonds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c. Payment bonds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

41.

Are the following contract provisions appropriately included in the grant-assisted contracts?	Yes	No	N/A
a. Administrative, contractual, or legal remedies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Termination for cause and for convenience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Equal Employment Opportunity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Davis-Bacon Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Copeland "Anti-Kickback" Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Contract Work Hours and Safety Standards Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Clean Air Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Federal Water Pollution Control Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Energy efficiency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Debarment and suspension	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Byrd Anti-Lobbying Amendment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Procurement of recovered materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m. Rights to inventions made under a contract	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

Procurement Policy Compliance

42.

Do the subrecipient's adhered to the state's policy in regard to its code of ethics and/or conflict of interest provisions?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

43.

Does the subrecipient follow the state's requirements for contract administration?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

44.

Has the subrecipient complied with the state's principles for open and free competition?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

45.

Does the subrecipient follow the state's provisions for conducting cost/price analysis?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

46.

Does the subrecipient follow the state’s provisions for conducting or developing independent cost estimates before receipt of bids or proposals?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

47.

Does the subrecipient follow the grantee’s bonding and insurance requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

48.

Does the subrecipient adhere to the grantee’s requirements for Small, Minority, and Women-owned enterprises contract opportunities?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

49.

Does the subrecipient’s contracts include all necessary provisions required by DCA and the state?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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Describe basis for conclusion:

4. Fair Housing and Equal Opportunity

PURPOSE

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

The Equal Opportunity Act prohibits employment discrimination on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, and marital or familial status. Added as an amendment to Title VII, it expands the protection of Title VII to public and private employers with 15 or more employees, both public and private labor organizations with at least 15 members, and employment agencies

Fair Housing and Equal Opportunity (FHEO) monitoring reviews are on specific fair housing and equal opportunity requirements.

Compliance is based on requirements pertaining to nondiscrimination in activities receiving Federal financial assistance, including:

- Title VI of the Civil Rights Act of 1964;
- Section 109 of Title I of the Housing and Community Development Act of 1974;
- Section 504 of the Rehabilitation Act of 1973; and
- The Age Discrimination Act of 1975.

MONITORING

DCA uses several tools to assess subrecipients' past and current performance. On-site monitoring visits, off-site reviews, and audits ensure that program funds are being used properly. These reviews also determine whether a subrecipients implementation activities comply with CDBG-DR program goals and regulations.

On site monitoring visits provide DCA with an opportunity to assess the Fair Housing and Equal Employment Opportunity policies of current subrecipients. During visits, DCA will review activity records and meet with grantee staff.

SUGGESTED MONITORING ATTENDEES

- City or County Manager
- Grant Manager
- Activity Manager
- Case Manager

REVIEW OF POLICIES

When reviewing fair housing and equal opportunity policies of subrecipients, DCA staff should familiarize themselves with all relevant federal and state laws and regulations. Subrecipients should make all SOPs, manuals, and all public-facing information, such as a website (if applicable), available to the grantee.

Factors to be considered when reviewing policies:

- Ensure Fair Housing and Equal Opportunity information has been recognized by subrecipient
- Analyze any impediments to Fair Housing and Equal Opportunity choice that may exist
- Determine if subrecipient has abided by Fair Housing and Equal Opportunity guidelines
- Ensure subrecipient provided information on Fair Housing and Equal Opportunity to staff and applicants
- Direct subrecipient to information on Fair Housing and Equal Opportunity via <https://www.hudexchange.info/activitys/affh/>

When considering findings following a review of FHEO policies, DCA staff -may consult with the department's legal counsel.

FAIR HOUSING AND EQUAL OPPORTUNITY CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

AFFIRMATIVELY FURTHERING FAIR HOUSING (FOR LOCAL GOVERNMENT RECIPIENTS)

1.

What actions affirmatively furthering fair housing have been taken by the subrecipient?
Describe basis for conclusion:

TITLE VI, SECTION 109 DATA

2.

Did the subrecipient maintain summary data by activity on beneficiaries of, individuals participating in, and/or applicants for the activity, broken out by:	Yes	No	N/A
a. Race and ethnicity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Gender characteristics?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3.

For race and ethnicity, is the subrecipient including all of the HUD required classes?	Yes	No	N/A

a. American Indian or Alaska Native	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Asian	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Black or African American	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Native Hawaiian or Other Pacific Islander	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. White	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. American Indian or Alaska Native <u>and</u> White	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Asian <u>and</u> White	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Black or African American <u>and</u> White	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. American Indian or Alaska Native <u>and</u> Black or African American	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Other multiple race combinations greater than one percent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

DISPLACEMENT AND RELOCATION

4.

Did the subrecipient conduct displacement and/or relocation activities?	Yes	No	N/A
If "Yes," were there records maintained on households displaced by CDBG-DR-funded activities, including the following? (Check all that apply)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Race and ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Gender and single heads of households	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Addresses and census tracts of the housing units to which each displaced household relocated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

SECTION 504

5.

For subrecipients with 15 or more employees, is there a formal, written grievance procedure for resolution of complaints alleging discrimination based on disability?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

For subrecipients with 15 or more employees, have the appropriate initial and continuing steps to notify participants, beneficiaries, applicants, and employees, included those with impaired vision or hearing, been taken to confirm that there will be no discrimination on the basis of handicap status?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

ACCESSIBILITY OF NON-HOUSING FACILITIES

7.

Were CDBG-DR or CDBG-MIT funds used to design and construct new non-housing facilities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

8.

If the answer to the above question is “yes,” are the new non-housing facilities being designed and constructed to be readily accessible to, and usable by, persons with disabilities in conformance with accessibility requirements?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

9.

Were CDBG-DR or CDBG-MIT funds used to make alterations to existing non-housing facilities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

10.

If the answer to the above question is “yes,” did such alterations make these facilities usable by, and accessible to, persons with disabilities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

HOUSING

11.

Does the activity involve new housing construction or alteration to existing housing?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

12.

If the answer to the above question is “yes,” is the new housing construction or alteration readily accessible to, and usable by, persons with disabilities? (NOTE: A lack of records beyond 3 years is not a basis for a finding)	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

COMMUNICATIONS

13.

Has the subrecipient taken steps to ensure effective communication with applicants, beneficiaries, and members of the public who have hearing, vision, or speech impairments using:	Yes	No	N/A
a. Qualified sign language and oral interpreters?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Readers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Use of tapes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Braille materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. TTD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (describe below)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

14.

If the answer to all the items above is “no,” describe the methods used by the subrecipient to facilitate effective communication.

Describe basis for conclusion:

15.

Has the subrecipient adopted and implemented procedures to ensure that interested persons (including those with impaired vision or hearing) can obtain information concerning the existence and location of accessible services, activities, and facilities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If the answer is "yes," is there documentation to show steps that the subrecipient has undertaken to attract persons with disabilities, such as:			
Making buildings more accessible to persons with physical disabilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Home visits to assist applicants for activity benefits in filling out applications?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supplying sign language interpreters for public meetings on issues relating to the subrecipient activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

RECORD KEEPING

16.

Does the subrecipient maintain data for compliance purposes showing the extent to which persons with disabilities are beneficiaries of the activities being reviewed?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

17.

Is a copy of the “Reasonable Accommodation Policy” available for review?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion: 			

5. Public Infrastructure

PURPOSE

The purpose of this chapter and checklist is to provide guidance on monitoring public infrastructure activities implemented by subrecipients. Under CDBG-DR and CDBG-MIT activities, grantees and subrecipients may use funds to undertake a variety of public facilities and public improvement projects, which are interpreted to include all facilities and improvements that are publicly owned, or that are owned by a nonprofit and open to the general public. As a result of the extensive funding provided to these activities, monitoring their progress and administration is vital to meeting HUD requirements and complying with CDBG-DR or CDBG-MIT statutes and regulations.

APPLICABILITY

The CDBG-DR program identifies publicly owned facilities and infrastructure such as, streets, playgrounds, and underground utilities, and buildings owned by non-profits that are open to the general public, as Public Infrastructure and Improvements. Safe and accessible infrastructure is essential to quality of life and to building communities that support community diversity and stability. Measuring an activity's impact can assist with future public infrastructure planning by helping grantees better understand conditions that enable activities to succeed. Metrics relating to impacts also provide useful information to HUD and elected officials to demonstrate the valuable role of CDBG-DR funds in community infrastructure investments.

ENTRANCE INTERVIEW ATTENDEES

1. Chief Elected Official (or staff member)
2. Clerk or Finance Director
3. City or County Administrator (if applicable)
4. Grant Administrator
5. Engineer or Architect
6. City or County Attorney (if Acquisition is part of activity)

SELECTION OF CASE FILES TO BE REVIEWED

The purpose of the selection of files being reviewed is to monitor infrastructure activities carried out with CDBG-DR or CDBG-MIT funds, in addition to the applicable -Federal Register Notice based on the disaster year being monitored. 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).

REVIEWING CASE FILES

The Exhibits should be used to assist the reviewer in thoroughly examining the CDBG-DR or CDBG-MIT program subrecipient's records and files for each activity selected and determine whether the subrecipient is in compliance according to the Federal regulations associated with CDBG-DR requirements. The reviewer must answer the national objective question below that corresponds to the national objective met by the activity: Low- and moderate-income or Urgent Need. Note: Compliance

with criteria for a national objective depends upon how activity has been structured. Refer to HUD guidance regarding the use of the Low- and Moderate-Income (LMI) national objective (housing, limited clientele, area benefit, etc.) AND the applicable Federal Register notices, which contain waivers and alternative requirements that modify LMI national objective criteria.

MONITORING PROCEDURE:

1. Notify subrecipient of monitoring/site visit at least 14 days prior to visit.
2. Review each item on the start-up site visit report with individuals present.
3. In addition, it is mandatory that the individual on the local level responsible for the activity also be present, in addition to the grant administrator. Also, include the engineer and/or architect if possible
4. Ensure the Local government has a copy of the Applicant and Recipient manuals
5. Review the General Conditions for the grant
6. Ensure the Special Conditions for the grant were met prior to expending grant funds
7. Review the Budget and Goals information in eCivis and check for errors. If errors are found, encourage subrecipient to correct while present.
8. Discuss the importance of the Leverage and review documentation
9. Discuss the important of following the activity schedule (make adjustments if needed).
10. Discuss and inquire about potential Conflicts of Interest.
11. Discuss the importance of the roles of individuals involved in the activity.
12. List the status of the activity. Indicate if activity is on, behind or ahead of schedule per activity schedule; include draw down percentage status (confirm draw down percentage with CDBG-DR grant analyst)

PUBLIC INFRASTRUCTURE CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

ELIGIBILITY

1.

Does the activity meet the requirements of Section 105(a)(2) of the Housing and Community Development Act of 1974?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Below, please check all activities the project/activity involves.			
Acquisition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
New Construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reconstruction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

Briefly describe the intended use of the project.

3.

If the CDBG-DR funded activity consists of improvements or construction of a building or facility, will it be used for the general conduct of government?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

4.

If the answer to the above question is "yes," did the local government consult with the state to receive a waiver for buildings for the general conduct of government?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

Is the activity being carried out by a non-profit entity?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

Is the title of the building or facility currently or in the future to be held by a non-profit?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

7.

Will the building or facility be operated so as to be open for use by the general public during all normal hours of operation?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

8.

If the activity is a public facility, are there or will there be fees charged for the use of such facility?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

9.

If the answer to the above question is "yes," are the proposed fees reasonable?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

10.

Will the proposed fees have the effect of precluding low and moderate income persons from using facilities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SOLICITATION

11.

Does the bid package contain the following requisite CDBG-DR documents?	Yes	No	N/A

Advertisement for bid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Instructions to bidders and bid proposal forms?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Correct wage decision(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equal employment requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Section 3 language and requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General conditions of the contract to include the Federal Labor Standards Provision (HUD Form 4010)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supplemental general conditions for the contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bonding and insurance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor and sub-contractor eligibility verification requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

12.

Is there evidence a copy of the bid package was sent to all bidders?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

13.

If applicable, is there evidence bid amendments were sent to each bidder?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

14.

Does the file contain a log of bids received by time, date of receipt, and offer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

16.

If applicable, please list the bid opening date in the space below.

17.

If applicable, does the subrecipient have minutes of the bid opening on file?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

18.

Is there evidence of a bid bond?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

19.

Was the eligibility determination provided before the construction contract was awarded to the successful bidder?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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Describe basis for conclusion:

20.

Is the successful bidder the lowest bidder?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

21.

If the answer to the above question is “no,” was a “Statement of Justification” sent to the lowest bidder?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

22.

Is the date of the construction contract award within 90 days of the bid opening?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

23.

If the answer to the above question is “no,” is there documentation that a new wage decision and lock-in was approved by DCA?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If no, DCA staff will need to determine whether there was a modification to the wage decision that may have resulted in an underpayment of wages and fringe benefits paid to workers.			

Describe basis for conclusion:

CONSTRUCTION CONTRACT

24.

Does the construction contract contain the following requisite CDBG-DR documents?	Yes	No	N/A
Advertisement for bid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Instructions to bidders and bid proposal forms?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Correct wage decision(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Equal employment requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Section 3 language and requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General conditions of the contract to include the Federal Labor Standards Provision (HUD Form 4010)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supplemental general conditions for the contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor's certifications?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor's bid proposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bonding and insurance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor and sub-contractor eligibility verification requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CONSTRUCTION PRE-CONSTRUCTION CONFERENCE

25.

Did a review of the pre-construction conference minutes adequately detail information regarding the following?	Yes	No	N/A
Federal Labor Standards Provisions (Exhibit VIII-J)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additional job classifications requests?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Weekly payroll submission, payroll signatures, and statements of compliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Posting the wage decision?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Apprentices and trainees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overtime pay provisions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Payroll deductions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employee interviews?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prevailing wage rates or wages?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Restitution for underpayment of wages?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Section 3 planning requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contractor and sub-contractor eligibility verification requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CONSTRUCTION FILE

26.

In DCA's review of the construction file, was it found that the subrecipient adequately kept records of building permits?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Copies of construction inspections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Certificate of Occupancy (CO)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Construction contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contract amendments (if applicable)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Work order changes (if applicable)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Deed of Easement (if applicable)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copies of payment and performance bond?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copies of contractor/sub-contractor certification for EEO?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copies of contractor/sub-contractor certification for Section 3?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copies of contractors/sub-contractor Affidavit of Prime Bidder?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Notice to Proceed date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Architect's Certification (Architectural Barrier's Act) or appropriate HUD waivers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6. Labor Standards

PURPOSE

The purpose of this chapter is to provide guidance for the monitoring of Subrecipients' compliance to federal labor standards. Labor laws that may apply to CDBG-DR-funded construction work include the following:

The Davis-Bacon Act (40 USC, Chapter 3, Section 276a-276a-5; and 29 CFR Parts 1, 3, 5, 6 and 7) is triggered when construction work over \$2,000 is financed in whole or in part with CDBG funds. It requires that workers receive no less than the prevailing wages being paid for similar work in the same area. This act does not apply to the rehabilitation of residential structures containing less than eight units or force account labor (construction carried out by employees of the unit of general local government).

The Copeland Anti-Kickback Act (40 USC, Chapter 3, Section 276c and 18 USC, Part 1, Chapter 41, Section 874; and 29 CFR Part 3) requires that workers be paid weekly, deductions from workers' pay be permissible, and contractors maintain and submit weekly payrolls.

The Contract Work Hours and Safety Standards Act (40 USC, Chapter 5, Sections 326-332; and 29 CFR Part 4, 5, 6 and 8; 29 CFR Part 70 to 240) applies to contracts over \$100,000 and requires that workers receive overtime compensation (time and one-half pay) for hours they have worked in excess of 40 hours in one week. Violations under this Act carry a liquidated damages penalty, which is \$10 per day, per violation.

LABOR STANDARDS CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

PAYROLLS

1.

Is a Davis-Bacon wage decision assigned to each covered contract?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

Is the assigned wage decision and HUD 4010, "Federal Labor Standards Provisions," incorporated into each bid specification and/or contract?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3.

Does the subrecipient's files contain each weekly payroll report from the contractor and sub-contractors, beginning from the construction start date through the construction end date or present date (first to current/last)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

4.

Please answer the following questions in regard to the U.S. DOL Form WH-347, "Statement of Compliance."	Yes	No	N/A
	Are the payrolls signed by an appropriate principal of the firm?	<input type="checkbox"/>	<input type="checkbox"/>
Do they include a signed "Statement of Compliance" from the contractor?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Have questions 4a and 4b been answered in the "Statements of Compliance?"	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

Have the appropriate wages and fringe benefits been paid by the contractor?	Yes	No	N/A
		<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

If the answer to the above question is "no," please explain the deficiency and what steps have been taken to correct it:

7.

If applicable, are corrected payrolls on file with the subrecipient?	Yes	No	N/A
		<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

8.

Was time and a half paid for all work over 40 hours per week?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

9.

Has an underpayment of over \$1,000 ever occurred?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

10.

If the answer to the question above is "yes," was an Enforcement Report filed with the Department of Labor?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

11.

Are there apprentices or trainees on the payroll report(s)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

12.

If the answer to the above question is “yes,” does the subrecipient have a copy of the apprentice certification with the apprentice’s registration number or the Trainee Activity Certification for each trainee or apprentice on the payroll report(s)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

13.

Are there additional job classifications on the payroll report that do not appear on the wage determination?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

14.

If the answer to the above question is “yes,” is there evidence the subrecipient requested additional job classifications through DCA?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

15.

If the answer to the above question is “yes,” does the subrecipient’s file contain copies of the approved additional job classification request wage rates from DCA?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

16.

Does the subrecipient's file contain evidence that payrolls were reviewed by the subrecipient in a timely manner to ensure early identification of problems and that correct wages were being paid?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

17.

Is there a signed Final Statement of Wage Compliance on file?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

INTERVIEWS

18.

Were job-site interviews conducted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

19.

Does the subrecipient have copies of each Record of Employee Interview Form documenting interviews?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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Describe basis for conclusion:

20.

Did interviews record work performed by the worker and observed by the interviewer?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

21.

Were interviews compared with payrolls?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

22.

Was at least 10% of personnel from each job classification interviewed?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

7. HOUSING

PURPOSE

The Georgia Homeowner Rehabilitation and Reconstruction Activity (HRRP) is offered under Georgia's Community Development Block Grant Disaster Recovery (CDBG-DR) Activity which aids persons impacted by presidentially-declared disasters. The HRRP helps with housing repair and reconstruction and is designated to assist owner – occupied, single family properties.

The Affordable Multi-Family Rental Program is also funded with CDBG-DR monies by DCA. This program has facilitated the creation of quality, affordable housing units to help build resiliency and alleviate the rental stock shortage caused by the 2017 disasters. DCA awarded 9% Housing Tax Credits (“LIHTCs”) and CDBG-DR funds to four developments. The 9% Low income Housing Tax Credits (LIHTCs) for the 4 developments total \$3.4 million, and the CDBG-DR funds for the 4 development total \$13.5 million. The following developments were awarded:

- Arbours at Kingsland (Camden County)
- Perry Place (Glynn County)
- Grove Park Apartments (Camden County)
- Havenwood Springs (Dougherty County)

MONITORING PROCESS

The below information outlines the basic criteria for selecting areas to be monitored and provide guidance for determining which specific files in an area should comprise the review sample for the monitored activity.

Georgia DCA must constantly monitor the HRRP performance to ensure time schedules are being met, projected milestones are being accomplished, and other performance goals are being achieved in accordance with the approved application. In addition, all activities must be conducted in compliance with federal and state requirements.

The CDBG-DR Project Specialist will review individual activity files for consistency, completion, and eligibility.

SELECTION OF CASE FILES TO BE REVIEWED

The review sample must be large enough to be representative of the size and nature of the workload and should be adjusted to reflect the reviewer's knowledge of activity participant performance and the other factors listed below. Generally, the cases shall be selected at random and cover the period since the last monitoring review, if applicable. Emphasis should be placed on more recent projects, which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new activity, the reviewer should select a representative sample of all cases since the beginning of the activity.

- Number and type of projects and activities receiving CDBG-DR funding and the organization of activity participant staff. The sample of cases should be representative of the various project types the activity participant has assisted with HUD funding (e.g., rehabilitation and reconstruction).

- Date of last monitoring review. Unless monitoring is targeted to addressing potential issues raised through complaints or other mechanisms, activities least recently and/or never reviewed should receive priority.
- If necessary, staff interviews will be conducted to assess the knowledge of activity staff. This will allow Georgia DCA to determine if more training, technical assistance, or other support is warranted for the success of the activity.
- The seriousness of previous monitoring findings that required corrective action. As appropriate, specific cases involved in prior findings should be reviewed.
- Analyze any related complaints and appeals filed with the activity participant or HUD.

The CDBG DR Project Specialist will use the checklists provided to monitor HRRP and/or the Affordable Multi-Family Rental Housing Program by the following (list is not all inclusive):

- Ensure all eligible participants met an approved National Objective
- Review intake documents and procedures
- Documentation showing established participant escrow accounts
- Explore citizen participation
- Examine environmental review process
- Review subrogation requirements
- Assess contractor documents
- Address construction guidelines

HOUSING CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity or Activity	
Grant Manager	
Date of Review	

1.

Do the policies ensure compliance with other federal cross-cutting requirements including the following?	Yes	No	N/A
Lead-based paint?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Civil rights?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Uniform Relocation Act?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Davis-Bacon Act?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

If CDBG-DR funds were used for the rehabilitation of real property located within the local 100-year floodplain, are those assisted properties in compliance with the flood insurance purchase and community participation requirements at Sections 102(a) and 202(a) of the Flood Disaster Protection Act of 1973, as amended and at 24 CFR 570.605 and 24 CFR 570.509(c)(4)(iv)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3.

Please identify the type of subrecipient for the activity being monitored.	
Local Government	<input type="checkbox"/>
Nonprofit	<input type="checkbox"/>
Vendor/Contractor	<input type="checkbox"/>

4.

If applicable, have local housing codes been adopted in conjunction with the subrecipient's rehabilitation standards?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

If the answer to the above question is "yes," how does the subrecipient determine that the work items meet local codes upon completion?
Describe basis for conclusion:

6.

Describe the process for preparing the work specifications and cost estimates, including which employee's positions have the responsibility to prepare the cost estimates and approve them.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

7.

	Yes	No	N/A

Is there a written procedure in place for changes in the scope of work and/or specifications?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

8.

Is there a procedure for determining if contract costs are reasonable, and if so, which employee positions have the responsibility for making the determination approving the costs?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

9.

If the answer to the above question is "no," what actions are being taken to ensure that costs are reasonable?
Describe basis for conclusion:

10.

Does the activity include any of the following?	Yes	No	N/A
a. Single family units	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Multifamily units	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

11.

Do the units fall under any of the following categories?	Yes	No	N/A
a. Rental	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Owner-occupied	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Both	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

12.

What type(s) of entity or entities are carrying out the activity?	Yes	No	N/A
a. Local Government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Non-profit Organization	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For-profit Developer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

13.

Was the subrecipient able to document that the disaster affected the quality, quantity, and/or affordability of the housing stock, causing that housing stock to be unable to meet post-disaster needs and population demands?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

14.

Do the subrecipient's policies and procedures require that activities with costs reimbursable by, or for which funds are made available by, the Federal Emergency Management Agency ("FEMA") or the Army Corps of Engineers <u>not</u> be funded with CDBG-DR funds?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

15.

Has the subrecipient met or does it intend to meet any of the green building standards?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

16.

Does the activity include the rehabilitation, reconstruction, or new construction of multi-family housing containing five or more units?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

17.

If the answer to the above question is "yes," does it meet the following accessibility requirements? (Check all that apply)	Yes	No	N/A
a. A minimum of 5% of total dwelling units (but not less than one unit) are accessible for individuals with mobility impairments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. An additional 2% of dwelling units (but not less than 1%) are accessible for persons with hearing or vision impairments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Units accessible on the ground level or are accessible by elevator.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

18.

Does the activity take place in an area delineated as a local 100 -year floodplain according to FEMA's most current flood advisory maps?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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Describe basis for conclusion:

19.

If the answer to the above question is “yes,” and the activity constitutes financial assistance for construction purposes, can the subrecipient verify that the owners of an assisted building or mobile home within a local 100-year floodplain have obtained or maintained flood insurance?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

20.

Has the subrecipient incorporated mitigative attributes into the design or modification of the home to minimize harm to or within floodplains in accordance with Executive Order 11988 and 24 CFR Part 55?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

21.

Is the subrecipient requiring new housing within a local 100 year floodplain to be elevated two feet higher than the latest FEMA-issued base flood elevation?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

22.

Has the subrecipient documented how the activities relate to the impact of the applicable disaster(s)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

23.

Did the subrecipient verify that activity funds are not duplicative of funds made available by FEMA, the Army Corps of Engineers, Small Business Association (SBA), or other funding sources?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

National Objective

24.

If the activity is classified under the low- and moderate-income (LMI) housing national objective, do reviewed activity files document the following?	Yes	No	N/A
a. Serviced households have incomes at or below 80% of the Area Median Income (“AMI”).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

25.

If the activity is classified under the Urgent Need national objective, do the reviewed activity files document the following:	Yes	No	N/A
Serviced households have incomes between 81% and 120% of the AMI.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

26.

Do reviewed activity files document that the activity met or will meet an eligible national objective?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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Describe basis for conclusion:

CONTRACTOR SELECTION

27.

Is there a written contractor selection procedure in place?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

28.

Is there an adequate pool of contractors who perform rehabilitation work as overseen by the subrecipient or its designee?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

29.

Does the subrecipient have a written procedure for resolving contract disputes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

30.

Whether the subrecipient has written procedures in place or not, describe the subrecipient's process for resolving contract disputes.

Describe the subrecipient's process:

ESCROW

31.

Has the subrecipient verified that an escrow account has been opened for use in funding the rehabilitation of residential properties, if applicable to the individual applicant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

32.

If the answer to question above is "yes," are the use of the funds limited to loans and grants of primarily residential properties containing no more than four dwelling units (and accessory space, if applicable)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

33.

Are the escrow accounts used and funds deposited into an escrow account, only when specifically provided for in an executed contract between a property owner and contractor?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

34.

Are escrow funds deposited into a non-interest-bearing account?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

35.

Does the subrecipient maintain a current and accurate subcontractor list, which includes names, contact information, and license numbers with provided expiration date?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

36.

Does the subrecipient maintain supporting documentation of ineligible applicant determinations?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

8. Duplication of Benefits

PURPOSE

In accordance with the Robert T. Stafford Act, as amended, the Georgia Department of Community Affairs (DCA) will take actions necessary to conduct comprehensive analyses of assistance provided to disaster recovery applicants recovering from Presidentially Declared disasters in the State of Georgia. These analyses will be conducted in order to prevent Duplication of Benefits (DOB) from occurring.

Federal law prohibits any person, business concern, or other entity from receiving Federal financial assistance for any part of a loss as to which he or she has already received financial assistance through any other activity, insurance or funding source.

The combination of any type of disaster assistance can cause duplication. After a disaster, applicants may be eligible for a number of benefits, such as FEMA Individual Household Assistance, personal insurance, SBA, low-interest loans, philanthropical assistance and/or other funding sources. Applicants may have received one or all of the available assistance.

A duplication of benefits occurs when an applicant (1) receives assistance from multiple sources intended for the same purpose or (2) the amount of assistance provided exceeds the total identified need.

To determine whether a duplication of benefits has occurred, Georgia DCA will:

- Verify the total amount of assistance received from FEMA, SBA, and other sources;
- Calculate duplication of benefits by subtracting non-duplicative assistance from the total amount of assistance;
- Reduce the total award by the amount of the duplication of benefits; and
- Obtain an agreement from applicants to repay duplicative assistance

MONITORING

DCA will allow the most permissive current interpretation provided by the U.S. Housing and Urban Development (HUD) in determining and verifying duplication of benefit. DCA will also use this interpretation while monitoring subrecipients' calculation of any possible DOB.

ATTENDEES FOR MONITORING

- Subrecipient Activity Director/Manager
- Grant Manager
- Case Manager
- City Manager/Representative

SELECTION OF CASE FILES TO BE REVIEWED

Provide guidance for determining which specific files in an area should comprise the review sample for the monitored activity or project.

The review sample must be large enough to be representative of the size and nature of the workload and should be adjusted to reflect the reviewer's knowledge of activity participant performance and the other factors listed below. Generally, the cases shall be selected at random and cover the period since the last monitoring review, if applicable. Emphasis should be placed on more recent projects, which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new activity, the reviewer should select a representative sample of all cases since the beginning of the activity.

STEPS TO COMPLETE MONITORING

The CDBG DR Project Specialist will use the monitoring template and examine the randomly selected files for the following, which should be accurate and up-to-date:

- Duplication of Benefits Verification Worksheet
- Duplication of Benefits Certification form
- Release of Information to Third Parties and Declaration Page (if applicable)
- Affidavit of No Insurance (if applicable)
- Other forms as deemed necessary to conduct the DOB

DUPLICATION OF BENEFITS CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity or Activity	
Grant Manager	
Date of Review	

1.

Is the subrecipient requiring all other sources of disaster assistance for the same purpose to be identified and considered to prevent a duplication of benefit (“DOB”)?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

2.

Are applicants for assistance required to disclose the following potential sources of disaster assistance:	Yes	No	N/A
a. Insurance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Federal Emergency Management Agency (“FEMA”)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Small Business Administration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. National Flood Insurance Activity (NFIP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Local, state, or federal funding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Nonprofit, private sector, and other charitable funding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

POLICIES AND PROCEDURES

3.

Has the subrecipient entered into a Subrogation agreement with the participant to repay any assistance later received for the same purpose as the CDBG-DR disaster recovery funds?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

4.

Does DOB documentation include any of the following?	Yes	No	N/A
a. Identification of the circumstances under which applicants declined assistance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Determination of the amount of CDBG-DR assistance that is necessary and reasonable to assist applicants in achieving recovery?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

Does the subrecipient’s final benefit calculation exclude non-duplicative assistance for the following instances:	Yes	No	N/A
a. Provided for a different purpose?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Used for a different, eligible purpose?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Assistance not available to the applicant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Assistance is a private loan not guaranteed by SBA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Any other asset or line of credit available to the applicant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

ACTIVITY FILES

6.

Are all sources of assistance that were provided to applicant for the same purpose determined to be a DOB?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

7.

How did the DOB determination impact the applicant's CDBG-DR award? If a DOB was found, was there a reduction in the award amount?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

8.

If a DOB occurred after assistance was awarded, were funds recaptured in accordance with the subrecipient agreement and the grantee's policies and procedures?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

9. Section 3

PURPOSE

The purpose of Section 3 of the Housing and Urban Development Act of 1968, as amended by Section 915 of the Housing and Community Development Act of 1992 (Section 3), is to “ensure that employment and other economic opportunities generated by certain HUD financial funding shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed toward low and very low-income persons, particularly those who are recipients of government funding for housing and to Business Concerns which provide economic opportunities to low- and very low-income persons.”

This policy pertains to training, employment contracting, and other economic opportunities arising in connection with the expenditure of Federal housing assistance and community development assistance that is used in conjunction with the following activities:

- Housing rehabilitation,
- Housing construction, and
- Other public construction

All grantees and subrecipients of Section 3 Covered Assistance (including but not limited to contractors, sub-contractors, developers, grantees, CHDOs, non-profits, and local government entities) must be in compliance with the provisions of this policy in order to be eligible for DCA awards.

APPLICABILITY

Section 3 of the Housing and Urban Development Act of 1968 by the Housing and Community Development Act of 1992. Section 3, as amended, requires that economic opportunities generated by Federal Housing and Community Development programs shall, to the greatest extent feasible, be given to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons.

Section 3 requirements apply to all projects and activities funded in whole or in part with covered funds and the entire project budget is then subject to Section 3.

SECTION 3 CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity or Activity	
Grant Manager	
Date of Review	

APPLICABILITY

1.

Does the activity involve any of the following?	Yes	No	N/A
a. Housing rehabilitation (including reduction and abatement of lead-based paint hazards)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Housing construction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Other public construction			
Describe basis for conclusion:			

THRESHOLDS

2.

Is the award to the subrecipient greater than \$200,000? If no, Section 3 does not apply.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

3.

If the answer to the question above is “yes,” does the value of work for any contractor or subcontractor exceed \$100,000? If no, Section 3 does not apply.	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CONSTRUCTION DOCUMENTS

4.

Does the bid package contain the Section 3 Requirements?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

Does the construction contract contain the Section 3 Requirements?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

Does the construction file include copies of contractor/sub-contractor certifications for Section 3?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

SECTION 3 POLICIES AND DOCUMENTATION

7.

For the time period reviewed, did the subrecipient's records include written procedures governing:	Yes	No	N/A
a. How Section 3 residents are to be notified about employment and training opportunities generated by subrecipient or its contractors as a result of the expenditure of covered financial assistance? (24 CFR 135.32 (a))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. How Section 3 business concerns are to be notified about contracting (or subcontracting) opportunities generated by the subrecipient or its contractors involving covered financial assistance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. How potential contractors for covered projects or Subrecipients of covered funds are to be notified about their requirements pursuant to Section 3? (24 CFR 135.32(b) and 24 CFR 135.32(f))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. How covered contractors and Subrecipients are to be monitored for compliance with the requirements of Section 3? (24 CFR 135.32(d) and 24 CFR 135.32(f))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Steps taken by the subrecipient to facilitate meeting the minimum numerical goals for employment and contracting opportunities? (24 CFR 135.32(c))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Did the Subrecipient provide evidence and/or documentation of the procedures described above?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

USE OF SECTION 3 RESIDENTS AS TRAINEES

8.

For the time period reviewed, did the subrecipient's records include written procedures governing:	Yes	No	N/A
a. The total number of training positions generated by the Subrecipient or its contractors?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The number of training positions generated by the Subrecipient or its contractors identified above that was provided to Section 3 residents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Description of how the Subrecipient or its contractors determined the eligibility for Section 3 residents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

USE OF SECTION 3 RESIDENTS AS EMPLOYEES

9.

For the time period reviewed, did the Subrecipient's records include information about:	Yes	No	N/A
a. The total number of permanent full-time positions generated by the subrecipient or its contractors as a result of the expenditure of covered funding? (24 CFR 135.30(b)(3)(iii))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The number of permanent full-time positions generated by the subrecipient or its contractors identified above that was filled by Section 3 residents? (24 CFR 135.30(b)(3)(iii))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Description of how the Subrecipient or its contractors determined eligibility of Section 3 residents? 24 CFR 135.34(b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

10.

For the time period reviewed, did the Subrecipient's records include information about:	Yes	No	N/A
a. Whether the minimum numerical goal for employment was met by the Subrecipient or its contractors [30% of the aggregate number of new hires was Section 3 residents]? (24 CFR 135.30(b)(3)(iii))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the minimum numerical goal for employment was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal? (24 CFR 135.30(d)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

CONTRACT AWARDS TO SECTION 3 BUSINESS CONCERNS

11.

For the time period reviewed, did the Subrecipient's records include information about:	Yes	No	N/A
a. The total dollar amount of covered construction contracts generated as a result of the expenditure of covered financial assistance. (24 CFR 135.30(c)(1))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The total dollar amount of covered construction contracts (or subcontracts) listed above that were awarded to Section 3 business concerns? 24 CFR 135.30(c)(1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c. Description of how the subrecipient or its contractors determined the eligibility of Section 3 business concerns? 24 CFR 135.36(b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

12.

For the time period reviewed, did the Subrecipient's records include information about:	Yes	No	N/A
a. Whether the minimum numerical goal for contracting was met by the Subrecipient or its contractors [10% of the total dollar amount of covered construction contracts were awarded to Section 3 business concerns]? (24 CFR 135.30(c)(1))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the minimum numerical goal for construction contracts was not met, did the subrecipient provide an explanation of why it was not feasible to meet the goal? (24 CFR 135.30(d))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

NON-CONSTRUCTION BUSINESS

13.

For the time period reviewed, did the Subrecipient's records include information about:	Yes	No	N/A
a. The total dollar amount of covered non-construction contracts generated as a result of the expenditure of covered financial assistance. (24 CFR 135.30(c)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The total dollar amount of covered non-construction contracts (or subcontracts) listed above that were awarded to Section 3 business concerns? (24 CFR 135.30(c)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Description of how the subrecipient or its contractors determined the eligibility of Section 3 business concerns? 24 CFR 135.36(b)			
Describe basis for conclusion:			

14.

For the time period reviewed, did the subrecipient's records include information about:	Yes	No	N/A
a. Whether the minimum numerical goal for contracting was met by the Subrecipient or its contractors [3% of the total dollar amount of covered non-construction contracts were awarded to Section 3 business concerns]? (24 CFR 135.30(c)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the minimum numerical goal for non-construction contracts was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal? 24 CFR 135.30(d)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

PROCUREMENT PROCEDURES

15.

For the time period reviewed, did the subrecipient's records include information about:	Yes	No	N/A
a. Notification of covered contractors regarding their responsibilities pursuant to the requirements of Section 3? (24 CFR 135.30(c)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Monitoring covered contractors for compliance with Section 3? (24 CFR 135.30(c)(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. The imposition of penalties upon contractors for noncompliance, including refraining from entering into contracts with any contractor that has violated the requirements of Section 3? (24 CFR 135.36(b))			
c. Whether covered solicitations (RFPs, RFQs, IFBs, etc.) contain the Section 3 clause found at 24 CFR 135.38 or otherwise indicates the applicability of Section 3 to the covered project? (24 CFR 135.30(c)(2))			
d. If the minimum numerical goal for non-construction contracts was not met, did the Subrecipient provide an explanation of why it was not feasible to meet the goal? (24 CFR 135.30(d))			
Describe basis for conclusion:			

REPORTING AND RECORDKEEPING

16.

For the time period reviewed, did the Subrecipient’s records include information about:	Yes	No	N/A
a. Has a Section 3 Report been completed and submitted to DCA? (24 CFR Part 135.90)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. For the time period reviewed, did the subrecipient’s records include documentation of the actions taken to comply with the Section 3 regulations? (Such documentation may include the results of the actions taken and any impediments encountered during the implementation of the activity(s) covered by Section 3) (24 CFR 135.32(e))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

10. Workforce Development

PURPOSE

The Workforce Development Program (WFD) was developed in response to the economic impact of Hurricane Michael. The intent of the activity is to boost long-term recovery by supplying residents of the affected communities with the necessary skills to increase household income through training in high demand trades. Funding for job training will strengthen collaborations between Georgia's workforce, education training centers, and employers with a shared goal of providing solutions to promote growth and stability of the local economy.

The purpose of this monitoring handbook is to establish baseline protocols for monitoring implementation of the activity and ensure compliance with all federal and state requirements. As a recipient of CDBG-DR funding, the State of Georgia (DCA) is subject to monitoring of funding and activities. DCA must also ensure our subrecipient, the Technical College System of Georgia and its four (4) eligible colleges, comply with the criteria as they administer the activity. The guide below provides monitoring criteria that both DCA and TCSG must adhere to when disbursing CDBG-DR funding through the WFD Program.

APPLICABILITY

The Review of CDBG-DR Workforce Development Activity (WFD) Subrecipients differs from other CDBG-DR activities because the subrecipient is a state agency, the Technical College System of Georgia (TCSG). Under TCSG, there are four (4) eligible colleges administering the activity. The following criteria will be monitored for each college.

ENTRANCE INTERVIEW ATTENDEES

1. CDBG-DR WFD Project Director
2. Director of Accounting
3. Case Manager(s)
4. Assisting TCSG Staff

SELECTION OF FILES TO BE REVIEWED

The activity or project being reviewed may include participant files or financial files for the subrecipient expenditures. Therefore, the documents reviewed may contain participant applications, student files, as well as files for financial disbursement. The following guidelines outline the basic criteria for selecting areas to be reviewed and provide guidance for determining which specific files in an area should comprise the review sample for the monitored activity or project.

The review sample must be large enough to be representative of the size and nature of the workload and should be adjusted to reflect the reviewer's knowledge of activity participant performance and the other factors listed below. Generally, the participant files shall be selected at random and cover the period since the last monitoring review, if applicable. Emphasis should be placed on more recent projects, which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new activity, the reviewer should select a representative sample of all cases since the beginning of the activity.

- Basic Criteria. Factors to be considered in selecting files to be reviewed:
 - Number of participants receiving CDBG-DR funding and the organization of activity participant staff. An individual participant may receive funding for tuition, supplies, and/or support services, and disbursement files will be maintained as well. Those functions may not necessarily be managed by the same staff and, therefore, coordination is required among the various staff which contribute to the participant and financial disbursement processes. The sample of files should be representative of the various activities the activity participant has assisted with HUD funding (e.g., associate's degree, dual enrollment, and support services).
 - Date of last monitoring review. Unless monitoring is targeted to addressing potential issues raised through complaints or other mechanisms, activities least recently and/or never reviewed should receive priority.
 - The experience and training of the activity participant's staff. Activities carried out by new or inexperienced staff should receive a priority.
 - The seriousness of previous monitoring findings that required corrective action. As appropriate, specific cases involved in prior findings should be reviewed.
 - When applicable, the income levels of persons in the caseload.
- Student File Sample. For all projects, participant files should be examined. Documents include application file, all disbursement request pertaining to participant costs, participant accomplishments.
- Disbursement Sample. The sample should provide a basis to determine whether payments were computed properly and made promptly. The sample of files should include disbursements for participant costs as well as reimbursement requests for activity delivery costs.

REVIEWING CASE FILES

The Technical College System of Georgia and its 4 colleges which fall within the 20 counties eligible for funding are the subrecipients of funds and are responsible for the administration of the activity.

Activities to be monitored include the following:

- Application intake through eCivis online platform
- Student File Maintenance
- Funds Disbursement
- Submittal of Draw Requests to DCA

APPLICATION INTAKE

Documentation for application and student files will be uploaded to the eCivis platform and are available throughout duration of the activity. At the time of application, all participants approved for activity must provide evidence that:

- Participant lives or works in eligible county
- Participant Income is below 80% median household income threshold for county
- Participant is a U.S. Citizen

The required documentation for each application include the following:

- IRS 1040 to verify income-based eligibility

- Government-Issued Photo Identification

Fully-executed copies of the following documents should be considered by DCA staff:

- Duplication of Benefits Calculation
- Duplication of Benefits Certification
- Acknowledgement of Subrogation
- Acknowledgement of Truth
- Release of Information to Third Parties

Additional documents may include:

- Affidavit of One and the Same Name
- Zero-Income Affidavit
- Any other applicable documents that allow for a determination of eligibility

STUDENT FILE MAINTENANCE

Each activity participant will have a student file during and after activity enrollment. Case managers will need to include the following documentation in each participant file. The following documents will be included in monitoring for the student file:

- Documentation of any additional sources of potentially duplicative income
- Verification of repayment of funds and/or adjustment of activity payments based on additional income sources.
- Documentation of class attendance, if applicable, and course completion
- Documentation pertaining to any and all support services, including childcare enrollment, supply purchases, and transportation reimbursements.
- Documentation of all student expenditures and reimbursements, as outlined below

FUNDS DISBURSEMENT

Prior to disbursement of funds to pay for student enrollment, case managers must ensure that costs are reasonable and justifiable and that all funds are disbursed on a reimbursement basis. All funding disbursements must include signature authority and approval by case manager and/or employee with authority to approve as determined by TCSG and the colleges. All expenditures must be documented and retained in student file. Required documentation to be monitored includes, but is not limited to, the following:

- Invoices confirming costs for supplies
- Transcripts and proof of enrollment
- Verification of course costs
- Verification of certification exam costs
- Verification of certification exam completion
- Childcare proof of enrollment
- Childcare invoice and pricing verification
- Other price verification documentation as applicable

SUBMITTAL OF DRAW REQUESTS TO DCA

Each college will submit draw requests with individual student detail to TCSG on a monthly basis. These documents are subject to monitoring and must be maintained by colleges. TCSG will submit draw requests to DCA on a reimbursement basis. Each draw request must documentation including but not limited to the following:

- Draw request form with line items by activity. Each draw request must be fully executed by approval entity as designated on signature authority card.
- Invoice documentation or proof of expenditure by college, including ACH payment or check
- For Activity Delivery Costs, documentation of expenditures must be submitted. For staffing, employee detail and hours worked must be submitted. For employees dedicated 100% to WFD, letter from authorized individual with TCSG or College must be submitted with pay request.

INTERVIEWS

The following factors should be used to determine whether personal interviews are warranted as part of the review:

- Documentation in the case file is not sufficient to permit the reviewer to clearly judge whether the person received the full range of assistance.
- File documentation indicates the person may have had difficulty representing his or her best interests.
- A person's case file has remained open for an extended period of time.
- Personal interviews are determined to be necessary

When conducted, interviews should be face-to-face, when feasible. Alternative formats should be used to accommodate any person needing or requesting a reasonable accommodation. Interpretive services are to be arranged for any persons who have limited English proficiency.

Before interviewing subrecipient or vendor personnel, DCA staff must inform the interviewee that all interviews are voluntary and ensure that the person understands the decision to respond to a question is entirely voluntary. No penalty will result from a decision to respond or not respond.

POLICIES AND PROCEDURES

DCA, has published policies and procedures in the CDBG-DR Workforce Development Manual. This resource outlines all requirements for subrecipients and is available as a reference throughout the administration of the activity. The following is outlined in the manual and subrecipient must maintain knowledge and implementation of the following:

- Eligibility of Activities
- Activities relate to the impact of Hurricane Michael
- Activities to be located in an area that was presidentially-declared as a major disaster
- Activities to be CDBG Eligible
- Activities to meet a national objective (LMA)

OVERSIGHT AND REPORTING

The subrecipient is expected to submit quarterly reports to DCA. This report will track expenditures to-date, as well as activity accomplishments. Items to be tracked include, but are not limited to the following:

- Amount spent to-date on Activity Delivery Costs
- Amount encumbered on student enrollment
- Amount spent on students enrolled
- Number of students who have completed activity
- Enrollment of Dual Enrollment Students
- Job placement for students who have completed activity

IMPROPER PAYMENTS

An improper payment means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements; and includes any payment to an ineligible party, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper. In regard to Improper Payments, do reviewed activity files document:

- That an improper payment of CDBG-DR funds was not made? [See Federal Register Notice 85 FR 4681; 2 CFR 200.302(b)(4) and 2 CFR 200.303(d); 24 CFR 570.502]
- In the case that an improper payment was made, is there documentation that the subrecipient is taking prompt and appropriate corrective action? For example, seeking recapture of funds resulting from an improper payment could be an appropriate corrective action. [See Federal Register Notice 85 FR 4681, 2 CFR 200.302(b)(4) and 2 CFR 200.303(d); 24 CFR 570.502]

FILE REVIEW

Subrecipient (TCSG) will be monitored for compliance with the LMI Area Benefit (LMA) National Objective. Reviewed activity files document that the activities will benefit all of the residents in a particular area and the area defined by the grantee is primarily residential; AND one where at least 51 percent of the residents in the area are low- and moderate-income persons or the percent of low- and moderate-income residents in the area equal or exceed the exception criteria or upper quartile.

[24 CFR 570.483 and 24 CFR 570.490 (as modified by waiver and alternative requirement) (State); 24 CFR 570.208(a)(1) and 570.506 (Entitlement); See applicable Federal Register notice(s)]

According to the action plan and activity manual, 100% of participants in the WFD activity will be Low- to Moderate-Income individuals, which will be confirmed at time of application. Documentation of this must be maintained in participant file in eCivis.

WORKFORCE DEVELOPMENT CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

1.

What entity is responsible for the direct administration of the activity?

2.

Please provide a brief description of the activity.

3.

Please provide a list of the files reviewed, including activity name/number, funds expended, and the date of expenditure.

4.

Does the subrecipient have written policies and procedures for program activities?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

In regard to eligibility of activities, is there documentation that the subrecipient requires that:	Yes	No	N/A
a. Activities relate to the impact of the applicable disaster(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Activities comply with applicable duplication of benefits (DOB) policies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Activities be CDBG-eligible?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Activities meet a national objective? If the answer is "yes," list the acceptable national objective(s) below.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

Is there documentation that activities were funded in accordance with DCA's policies and procedures?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

APPLICATION INTAKE

7.

Does the subrecipient appropriately utilize the system (eCivis) for application intake?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

8.

Has the subrecipient collected all required documentation from the activity applicants?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

9.

Has the subrecipient verified that activity participants fall within the eligible income limits and the LMI National Objective?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

10.

Has the subrecipient verified that activity participants reside or work in the eligible geographic areas?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

11.

Does the subrecipient have timely procedures in place to notify applicants of eligibility determination?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe basis for conclusion:

STUDENT FILE MAINTENANCE

12.

Has the Subrecipient adequately maintained files documenting attendance of participants in all applicable courses?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

13.

Has the Subrecipient tracked course completion and/or job placement of activity participants?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

14.

Has the Subrecipient tracked course completion and/or job placement of activity participants?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

15.

Does the subrecipient demonstrate appropriate oversight of expenditures and eligibility for support services?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a. Does the subrecipient maintain records pertaining to which participants are utilizing support services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the Subrecipient conduct periodic audits on support service eligibility (i.e., Attendance of participants, changes in income, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

16.

Does the subrecipient have a system in place for participants to report access to new, potentially duplicative funds?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

17.

Does the Subrecipient continuously monitor for potential duplication of benefits throughout the participants' enrollment in the activity?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

FUNDS DISBURSEMENT

18.

Does the subrecipient utilize a financial management system for tracking expenditures and reimbursements for activity participant costs?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

19.

Does the subrecipient maintain the following supportive documentation for disbursement of funds (check all that apply)?	Yes	No	N/A
a. Invoices confirming costs for supplies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Transcripts and proof of enrollment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Verification of course costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Verification of certification exam costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Verification of certification exam completion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Childcare proof of enrollment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

g. Childcare invoice and pricing verification	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Other price verification documentation as applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

11. Planning Activities

PURPOSE

DCA's planning programs (MIT Planning and CDBG-DR Planning) provide funding for communities to create strategies and plans, as well as conduct other efforts that further community development goals and mitigation efforts against future disasters. All planning efforts must comply with federal and state regulations, including 24 CFR §570.205, 24 CFR §570.206, and O.C.G.A. 50-8-7.1(b).

ENTRANCE INTERVIEW ATTENDEES

- Chief Elected Official (or staff member)
- Clerk or Finance Director
- City or County Administrator (if applicable)
- Grant Administrator
- Engineer or Architect City or County Attorney

SELECTION OF CASE FILES TO BE REVIEWED

The following sections outlines the basic criteria for selecting areas to be reviewed and provide guidance for determining which specific files in an area should comprise the review sample for the monitored program or project.

The review sample must be large enough to be representative of the size and nature of the workload and should be adjusted to reflect the reviewer's knowledge of program participant performance and the other factors listed below. Generally, the cases shall be selected at random and cover the period since the last monitoring review, if applicable. Emphasis should be placed on more recent projects, which can be expected to give the best indication of current performance. If this is an initial monitoring review for a new program, the reviewer should select a representative sample of all cases since the beginning of the program.

Basic Criteria.

Factors to be considered in selecting cases to be reviewed:

- Number and type of projects and programs receiving CDBG-DR or CDBG-MIT funding and the organization of program participant staff. A project or program may involve relocation, real property acquisition, or both. Those functions may not necessarily be managed by the same staff and, therefore, coordination is required among the various staff which contribute to the relocation and acquisition process. The sample of cases should be representative of the various property types the program participant has assisted with HUD funding (e.g., residential and commercial).
- Date of last monitoring review. Unless monitoring is targeted to addressing potential issues raised through complaints or other mechanisms, programs least recently and/or never reviewed should receive priority.
- Type and complexity of workload
- The experience and training of the program participant's staff. Activities carried out by new or inexperienced staff should receive a priority.

- The seriousness of previous monitoring findings that required corrective action. As appropriate, specific cases involved in prior findings should be reviewed.

REVIEWING CASE FILES

The reviewer shall request to view all final documentation of the subrecipient's planning efforts. The reviewer should pay particular attention to where the final documentation is housed and who has access to it. The reviewer should complete the checklist below for all planning efforts conducted by the subrecipient. While it is unlikely that an interview will be needed, if the reviewer determines that an interview is required, the section below outlines how the reviewer should proceed.

PLANNING ACTIVITIES CHECKLIST

Subrecipient Information	
Contract Number	
Subrecipient Name	
Type of Organization	
Name of Activity	
Grant Manager	
Date of Review	

1.

Was the planning effort that was conducted an eligible planning effort based upon federal and state regulations?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

2.

Was the planning effort conducted under the 2017 MIT Planning program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

3.

If yes, was the planning effort conducted intended to mitigate future disasters?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
Describe basis for conclusion:			

4.

Did the planning effort result in the creation of a plan or strategy?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

5.

If yes, did the plan or strategy comply with all State requirements found in 'Rules of Georgia Department of Community Affairs, Chap 110-12-1'?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

6.

If no, did the subrecipient indicate how the planning effort will be used?	Yes	No	N/A
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe basis for conclusion:			

Exit Conference

The Monitoring Team and subrecipient staff meet to present the tentative conclusions from the monitoring. Four objectives:

- To present preliminary results of the monitoring visit;
- To provide an opportunity for the subrecipient to correct any misconceptions or misunderstandings;
- To secure additional information from subrecipient staff to clarify or support their position; and
- For any deficiency that the subrecipient agrees with, to provide an opportunity for subrecipient staff to report on steps they are already taking to correct the matter. Within 45days the monitoring team will issue a monitoring letter to subrecipient including any concerns or findings with corrective actions and deadlines for response.