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DEPT. OF ECONOMIC DEVELOPMENT

# Monitoring Checklists

*Winter Storm Ulmer – Action Plan: DR – 4420*

**January 2023**

## RECORD OF CHANGES

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The following table summarizes amendments to the Monitoring Checklists.

Date Change Approved	Change Number	Description of Change

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# 1 MONITORING CHECKLISTS

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## 1.1 PURPOSE

These Monitoring Checklists accompany DED's Monitoring and Compliance Plan establish standards and provide guidance as well as present a key tool for monitoring Subrecipients under the State of Nebraska's Community Development Disaster Recovery Programs.

These checklists represent the various requirements associated with the CDBG-DR program. Some apply to most Federal programs, others are specific to HUD-funded programs. While only the lists that apply to Nebraska's CDBG-DR program are represented in this document, no additional requirements or monitoring has been added above and beyond program requirements.

The general guidance in the following Monitoring Checklists is designed to be used by DED staff and is consistent with HUD monitoring policies and expectations under the CDBG-DR grant award to the State of Nebraska. While DED staff will be filling out these checklists, this copy is provided all interested parties for their situational awareness and to encourage compliance throughout the program.

**These checklists and *Chapter 16: Monitoring and Compliance Plan* of the CDBG-DR Manual will be reviewed and revised as appropriate semiannually.**

## 1.2 ORGANIZATION OF CHECKLISTS

Each set of the Monitoring Checklists covers a specific program or activities, broken down into sections, with specific instructions for use of the tool. While monitoring visits generally happen yearly, not every checklist applies to every stage or every program or project. Each section addresses the following:

**Applicability:** What program would this checklist apply to, and at what stage?

**Objective:** Why does the checklist raise questions covering that particular section of the specific program or technical area and what is the specific purpose or reason for the review?

**Sources:** What documents should be reviewed to answer the checklist questions and thereby determine a conclusion about compliance with the relevant standards or requirements?

**Methodology:** How must the monitor conduct the review with the checklist, that is, what are the specific instructions or approaches to arrive at a basis for a conclusion?

## 1.3 PRE-MONITORING PREPARATION

Successful monitoring depends both on effective use of time and knowledgeable reviewers.

- Understand the governing statutes, regulations, and official guidance;
- Review and analyze participant reports, available data, Field Office files, audits and financial information, previous monitoring reports and issues; and
- Obtain other relevant information from knowledgeable Field Office staff.

## 1.4 CONDUCTING THE MONITORING

The process for determining whether to conduct Desktop or On-site Monitoring is detailed in **Chapter 16: Monitoring and Compliance Plan**. All monitoring will include the following elements:

- **Notification to the Subrecipient or Successful Applicant:** Once a date has been set, a formal written letter to the Subrecipient or Successful Applicant will be sent. Unless there are extenuating circumstances, the letter will be sent at least two weeks prior to the monitoring. The letter will discuss the monitoring schedule identify the areas to be reviewed, and the names and titles of the staff conducting the monitoring. It will also request that the necessary participant staff be available during the monitoring. For on-site monitoring, the letter will confirm the need for any required services (e.g., conference rooms, telephones, and computers).
- **Entrance Conference:** The purpose of the entrance conference is to (1) explain how the monitoring will be conducted, (2) identify and confirm key program participant staff that will assist during the monitoring, (3) set-up or confirm meeting or interview times (including any clients who may be interviewed) and, if applicable, schedule physical inspections, and (4) verify the programs/activities to be reviewed and how access to files and work areas will be granted (some programs files can be sensitive; some work areas can be hazardous).
- **Assessment:** Monitoring entails interviews and file reviews to verify and document compliance and performance (and can include physical inspections if monitoring is conducted on-site). DED will utilize checklists designed to capture all appropriate information and guide the review of the monitoring.
- **Exit Conference:** At the end of the monitoring review, an exit conference with the appropriate participant officials or staff to discuss preliminary conclusions will be held. In part, this serves to confirm the accuracy and completeness of the information used to form the basis for the monitoring conclusions.

## 1.5 MONITORING CONCLUSIONS

Where an identified deficiency results in a finding, the finding must include the condition, criteria, cause, effect, and required corrective action.

The following definitions apply in staff observations during a monitoring review and follow-up monitoring letter:

- **Finding:** A violation of law or regulation that can result in a State sanction.
- **Concern:** A matter that, if not properly addressed, can become a finding and can result in a sanction. Concerns are not explicitly statutory, regulatory, or other program violations.

### 1.5.1 FINDINGS

- The **condition** describes what was wrong or what the problem was.
- The **criteria** cite the regulatory or statutory requirements that were not met.
- The **cause** explains why the condition occurred.
- The **effect** describes what happened because of the condition.
- 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.

### 1.5.2 CONCERNS

- Monitoring concerns brought to the program participant's attention should include the condition, cause, and effect. DED monitoring staff will suggest or recommend actions that the program participant can take to address a concern, based on sound management principles or other guidelines. However, corrective actions are not required for concerns.

## 2 MONITORING AREAS

Requirement		Applicable Programs
1.	Acquisition	All
2.	Audits	All
3.	Construction	All construction projects
4.	Environmental Review	Affordable Housing Construction Program (AHCP) and Infrastructure Match
5.	Equal Employment Opportunity	All
6.	Demolition	AHCP and Infrastructure Match
7.	Fair Housing	All
8.	Financial Management	All
9.	Housing Rehabilitation	AHCP
10.	Internal Controls	All
11.	National Objective	All
12.	Procurement – General	All, except for-profit developers
13.	Procurement – Professional Services Contracts	Programs with external contracts
14.	Program Income	Only programs that generate income
15.	Recordkeeping - General	All
16.	Recordkeeping - Accounting	All
17.	Relocation	AHCP
18.	Section 504, 508, and Limited English Proficiency	All

### 3 PROJECT FILE CHECKLIST

Project File Checklist	
<input type="checkbox"/>	Check files for the current project status report on file, contact information, and budget.
<input type="checkbox"/>	Check project records for national objective, beneficiary/accomplishments, and activities funded. These items are stated in the Subrecipient Agreement/Funding Agreement recitals and sources/uses sections.
<input type="checkbox"/>	Check files for amendments and extensions of Subrecipient or Funding Agreements documented in the Subrecipient or Successful Applicant project file.
<input type="checkbox"/>	Review the project file checklist for special conditions and environmental review for determination meeting Subrecipient Agreement/Successful Applicant special conditions for the Release of Funds. Refer to Environmental Review.
<input type="checkbox"/>	Complete Subrecipient/Successful Applicant Files Documentation for the checklist items that apply to DED project records. This includes documentation that applies to Financial Management.
<input type="checkbox"/>	Check AmpliFund database as executed and approved by DED.
<input type="checkbox"/>	Check AmpliFund database financial overview/disbursement detail/summary and sources and uses records.
<input type="checkbox"/>	Check status of disbursements in AmpliFund prior to conducting performance review.

## 4 NOTIFICATION TO THE SUBRECIPIENT: THE MONITORING LETTER

All items listed below must be included in the Monitoring Letter.

Monitoring Letter Checklist	
<input type="checkbox"/>	CDBG-DR award number.
<input type="checkbox"/>	The name(s) and title(s) of the staff who performed the monitoring review.
<input type="checkbox"/>	Contact person's name, phone number, and email.
<input type="checkbox"/>	Names of Subrecipient or Successful Applicant.
<input type="checkbox"/>	Monitoring date(s) (Month/Day/Year) for areas monitored (enter N/A, if not applicable).
<input type="checkbox"/>	Monitoring type (desktop and/or on-site).
<input type="checkbox"/>	Follow-up date, if applicable.
<input type="checkbox"/>	A listing of the program/project/activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter).
<input type="checkbox"/>	If applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area).
<input type="checkbox"/>	Monitoring conclusions.
<input type="checkbox"/>	If applicable clearly labeled findings and concerns.
<input type="checkbox"/>	If there are findings, an opportunity for the Subrecipient to demonstrate, within a time prescribed by DED, that the participant has, in fact, complied with the requirements.
<input type="checkbox"/>	Response time frames, if needed.
<input type="checkbox"/>	An offer of technical assistance, if needed or a description of technical assistance provided during the monitoring.

## **5 ACQUISITION**

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### **5.1 APPLICABILITY**

Any project that purchases property. This checklist must be filled out for each property that is acquired by any means (purchase, exchange, etc.) by a Subrecipient or Successful Applicant.

### **5.2 OBJECTIVE**

To determine if the Subrecipient/Successful Applicant is complying with all Acquisition requirements while administering programs with CDBG-DR funds.

### **5.3 SOURCES**

- Contracts;
- Appraisal Information;
- Deeds/Title Information; and
- Subrecipient Agreement.

### **5.4 METHODOLOGY**

- Review sampling of Subrecipient's procured contracts;
- Review documentation and activities related to Acquisition;
- Review Subrecipient Agreement; and
- Examine adopted state/local acquisition procedures, if applicable.

Monitoring Area	Assessment Y,N,N/A
a. Is there a separate file for each acquisition?	
b. Was the General Information Notice hand-delivered or mailed with certified receipt?	
c. Is there a copy of the appraisal?	
d. Is there evidence (e.g. emails, letters, records of meeting minutes) that the owner was invited to accompany the appraiser?	
e. Was a review appraisal done?	
f. Were qualified independent appraisers used?	
g. If not appraised, was the value of the property \$10,000 or less?	
h. If less than \$10,000, was the value based upon a review of the available market data?	
i. Is a signed copy of the written offer to purchase in AmpliFund?	
j. Was the offer issued promptly after the appraisal? If not, please explain:	
k. Is there evidence of clear title, a current survey, deed and legal description of the property?	
l. Was a statement of settlement costs included in AmpliFund?	
m. Is there proof of payment in AmpliFund?	
n. Is there a document upload of the deed (signed, executed and file-stamped) in AmpliFund?	
o. If recipients determined not to purchase after distributing the notice to acquire and/or offer, is there a written notice of such decision AmpliFund?	
p. If the recipient permitted an owner or tenant to occupy the real property acquired, was the rent charged equivalent to the fair rental value of the property? Is the lease, or the rental amount charged, uploaded in AmpliFund?	
q. Was there a copy of any appeal or payment for incidental expenses or certain litigation expenses?	
r. Is the public notice uploaded to AmpliFund?	
s. Did the public notice contain language that made a general request for a non-specific site (general request for land for a water tower site or lagoon site or a dilapidated housing site)?	
t. Did the Subrecipient/Successful Applicant inform the responding property owner, in writing, that in the event the negotiation failed, the Subrecipient/Successful Applicant will not acquire the property? Is this document in AmpliFund?	
<b>Describe Basis for Conclusion:</b>	



## 6 AUDITS

### 6.1 APPLICABILITY

All projects each year.

### 6.2 OBJECTIVE

To ensure that the jurisdiction/entity('s) auditing records conform with Federal financial management standards as applicable to allocation(s) of CDBG-DR funds to the jurisdiction.

### 6.3 SOURCES

- **Chapter 6: Auditing** of the CDBG-DR Policy Manual;
- Subrecipient agreement (or equivalent legal document);
- Audit records; and
- Financial reports (submitted to the DED).

### 6.4 METHODOLOGY

- Review project files for documentation.

Monitoring Area	Assessment Y,N,N/A
a. Did the Subrecipient/Non-Profit Successful Applicant meet the requirement for Single Audit? <i>Note: Not applicable to for-profit Successful Applicants.</i>	
a(1) For-Profit Successful Applicant, are NIFA review documents on file?	
b. Did Subrecipient/Successful Applicant use an in-house Auditor?	
c. Did Subrecipient/Successful Applicant procure for an outside Auditor?	
d. Is the project an Environmental Assessment-Finding of No Significant Impact?	
e. Are Notifications of Single Audit (or other records) on file for each year which support the Subrecipient/Successful Applicant's determination whether an audit was conducted in accordance with the provisions of 2 CFR Part 200 and Generally Accepted Government Auditing Standards for the fiscal year?	
f. Are copies of audits on file?	
g. Are copies of correspondence regarding audit findings on file?	
<b>Describe Basis for Conclusion:</b>	

## **7 CONSTRUCTION**

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### **7.1 APPLICABILITY**

Any project that has gone out to bid on or worked on construction since the last monitoring visit.

### **7.2 OBJECTIVE**

To determine if the Subrecipient/Successful Applicant is complying with all construction requirements while administering programs with CDBG-DR funds. Ensure that construction contracts follow requirements and that awards are given in accordance with HUD standards.

### **7.3 SOURCES**

- Contracts;
- Subrecipient Agreement;
- Request for Proposals; and
- Request for Qualifications.

### **7.4 METHODOLOGY**

- Review sampling of Subrecipient's procured contracts;
- Check history/track record of procured contracts;
- Review Subrecipient Agreement;
- Review solicitations; ensure that requirements are clearly stated; and
- Review documentation and activities related to construction.

## 7.5 GENERAL CONTRACTOR CHECKLIST

Check for completion:

General Contractor Checklist	
<input type="checkbox"/>	Project name and description
<input type="checkbox"/>	Contractor name
<input type="checkbox"/>	Contractor clearance SAM date (checked for exclusions)
<input type="checkbox"/>	Contract award date
<input type="checkbox"/>	Contract execution date (cannot be prior to Notice of Release of Funds)
<input type="checkbox"/>	Contract amount
<input type="checkbox"/>	Estimated contract start date
<input type="checkbox"/>	Name of Labor Standards Compliance Office (LSCO)
<input type="checkbox"/>	Prevailing wage determination number
<input type="checkbox"/>	Publication date
<input type="checkbox"/>	Notice to proceed date
<input type="checkbox"/>	Verified date

## 7.6 SUBCONTRACTORS

Provide the following information for all subcontractors (if more than four, attach additional pages).  
*This applies to the Infrastructure Match Program.*

Subcontractor(s) Checklist		
<input type="checkbox"/>	Is this a Subcontractor Contract with General Contractor?	Y,N,N/A
<input type="checkbox"/>	Contractor name	
<input type="checkbox"/>	Contractor clearance SAM date (checked for exclusions)	
<input type="checkbox"/>	Contract award date	
<input type="checkbox"/>	Contract execution date (cannot be prior to Notice of Release of Funds)	
<input type="checkbox"/>	Contract amount	
<input type="checkbox"/>	Estimated contract start date	
<input type="checkbox"/>	Name of Labor Standards Compliance Office (LSCO)	
<input type="checkbox"/>	Was a force account labor used?	Y,N,N/A

## 7.7 CONSTRUCTION REQUIREMENTS

Please check all of following items on file that have been completed if the requirement met for each construction contract.

Monitoring Area	Assessment Y,N,N/A
a. Are preliminary design documents complete?	
b. Are cost estimates complete and accurate?	
c. Is there evidence that property, easement, or right-of way acquisition was completed prior to bid advertisement?	
d. Is there evidence wage rate determination and acknowledgement (for construction contracts exceeding \$2,000)?	
e. Is there evidence of review by municipal attorney (optional; often depends on local procedures)?	
f. Is the Contractor Clearance SAM Verification Record(s) complete?	
<b>Describe Basis for Conclusion:</b>	

## 7.8 BID PACKAGE

Monitoring Area	Assessment Y,N,N/A
a. Is there a Bid Package?	
b. Are general conditions met?	
c. Is prevailing wage determined?	
d. Is there evidence wage rate determination and acknowledgement (for construction contracts exceeding \$2,000)	
e. Is the bonding and insurance requirements clause met? <i>Federal bonding requirements apply to contracts over \$100,000; smaller contracts must comply only with local bonding requirements.</i>	
f. Are HUD 4010 labor standards provisions addressed?	
g. Is Title VI Clause (Civil Rights Act of 1964) addressed?	
h. Is Section 109 Clause (HCDA of 1974) addressed?	
i. Is Age Discrimination Clause (Age Discrimination Act of 1975) addressed?	
j. Is there a clear bid method?	
k. Do advertisement provides a clear and accurate description of all requirements and all factors for evaluating bids?	
l. Is there an addendum to bid documents, if applicable?	
m. Is there evidence that the bids were logged/recorded?	
n. Are there copies of all bids received?	
o. Is there evidence that the wage determination checked 10 days prior to bid opening and, if necessary, revised (for construction contracts exceeding \$2,000)?	
p. Is there written evaluation criteria?	
q. Is there a recommendation for award based on written criteria?	
r. Was the wage determination in effect at time of bid opening? <i>Construction contract exceeding \$2,000.</i>	
s. Does the Bid proposal include a 5% bid bond?	
t. Is there authorization of contract award by governing body on file?	
u. Does the file reflect the date of notice of contract award and pre-construction conference?	
v. Is wage determination in effect at time of contract award?	

**Describe Basis for Conclusion:**

## 7.9 EXECUTED CONTRACT DOCUMENTS

Monitoring Area	Assessment Y,N,N/A
a. Is this work underway?	
b. If work is complete, have all deliverables and requests for payments been submitted?	
c. Is there SAM contractor documented clearance and acknowledgement?	
d. Is there authorization of contract award by governing body on file?	
e. Is the contract \$100,000 or more?	
f. If yes, is the contractor's written Section 3 plan on file?	
g. Was the contractor's performance bonding/insurance for 100% of contract amount in effect at time of contract execution (2 CFR § 200.326)?	
h. Are there minutes of preconstruction conference?	
i. Did the contractor request and receive wage rate determination for any additional classification(s) not included in original determination (HUD 4230a)?	
j. Is there a signed and dated copy of the Notice to Proceed?	
k. Were there any Change Orders/Contract Amendments?	
<b>Describe Basis for Conclusion:</b>	

## 7.10 PAYROLL VERIFICATIONS

Verify payroll to ensure compliance with the Davis-Bacon Act.

Monitoring Area	Assessment Y,N,N/A
a. Are there originals of weekly payrolls and evidence review/verification?	
b. Are the payrolls submitted weekly?	
c. Are payrolls numbered and signed?	

d. Are payrolls in compliance with wage rate determination (rate of pay must be correct for each employee)?	
e. Are additional classifications included?	
f. Are apprentices or trainees included? If so, do the number of apprentices or trainees constitute more than 50% of workers?	
g. Is the computation of overtime pay correct?	
h. Were payrolls reviewed by labor contract officer?	
i. Are there weekly statements of compliance from contracts exceeding \$2,000?	
j. If statement of compliance not signed by owner, is there written documentation assigning authority to sign compliance statement?	
k. If written authorization, list date of authorization and identify name and title of individual authorized to sign statement of compliance.	
<b>Describe Basis for Conclusion:</b>	

## 7.11 EMPLOYEE INTERVIEW REQUIREMENTS

The following requirements only apply to contracts that are subject to the Davis-Bacon Act.

Monitoring Area	Assessment Y,N,N/A
a. Are employee interview requirements (for all construction contracts exceeding \$2,000) met?	
b. Are there job site posters?	
c. Is the Davis-Bacon poster and wage rate determination date documented be posted in all relevant languages, easily viewable by workers, and protected from the weather elements at the site of work?	
d. Is there correspondence and documentation regarding violations/complaints and actions taken?	
<b>Describe Basis for Conclusion:</b>	

## 8 ENVIRONMENTAL REVIEW

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### 8.1 APPLICABILITY

All projects each year, though the environmental review process may not be complete yet.

### 8.2 OBJECTIVE

To review Subrecipient/Successful Applicant(s) policies and procedures for conducting an environmental review on all HUD-assisted projects, including projects funded partially or in full by CDBG-DR, and all projects implemented or funded by a Nebraska public agency, or that require discretionary approval by a public agency to ensure conformity with related Federal and State guidance.

### 8.3 SOURCES

- Applicable Federal Register Notices;
- Subrecipient's core program policies where environmental review record (ERR) guidelines should reside; and
- Any additional ERR-specific Subrecipient policies and procedures.

### 8.4 METHODOLOGY

- Review general core files for the source documentation;
- Examine proper Subrecipient internal control features and if they have been established for conducting, submitting, and approving ERRs; and
- Provide an assessment of those controls by answering the questions below.

This section applies to all awards. If in-depth environmental review monitoring is conducted, utilize ["Exhibit 21-2-Guide for In-Depth Environmental Monitoring."](#)



Monitoring Area	Assessment Y,N,N/A
a. Is there an ERR with a project description including location(s) and all related HUD or non-HUD funded activities?	
b. Is the project exempt?	
c. Is the project categorically excluded?	
d. Is the project an Environmental Assessment-Finding of No Significant Impact?	
e. Did the project require re-evaluation?	
f. Were there substantial changes in the nature, magnitude or extent of the project or new circumstances or new conditions realized after the initial assessment?	
g. Is there a written Finding of Exemption signed by the official who has signatory authority, consistent with the activities undertaken?	
h. Is the Certificate of Continued Environmental Compliance signed by the official who has signatory authority consistent with the project description and activities?	
<b>Describe Basis for Conclusion:</b>	

## 9 EQUAL EMPLOYMENT OPPORTUNITY

### 9.1 APPLICABILITY

All projects each year.

### 9.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with all requirements of Equal Employment Opportunity regulations and requirements while administering programs administered with CDBG-DR funds.

EEO was designed to prohibit job discrimination for reasons of race, religion, color, national origin, and sex. The law requires that the most competent applicants be hired, and the most competent employees be promoted.

### 9.3 SOURCES

- Equal Employment Opportunity Policy;
- Equal Opportunity Reports;
- Subrecipient Website; and
- Equal Opportunity Information.

### 9.4 METHODOLOGY

- Review Plan; and
- Review Documentation and Activities related to Equal Opportunity.

Monitoring Area	Assessment Y,N,N/A
a. Does the Subrecipient/Successful Applicant have written equal opportunity employment /personnel policies and practices?	
b. Are there any indications that any person or group was denied employment on the grounds of race, age, sex or disability?	
c. Is there an outreach plan?	
d. Is there quarterly reporting?	
e. What is their utilization number out of total project budget?	
<b>Describe Basis for Conclusion:</b>	

## 10 DEMOLITION

### 10.1 APPLICABILITY

Any project that has demolished residential property since the previous monitoring.

### 10.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with all CDBG-DR Demolition requirements.

### 10.3 SOURCES

- Project Files;
- Recordkeeping Procedures; and
- Demolition Contracts.

### 10.4 METHODOLOGY

- Confirm that Subrecipient/Successful Applicant is properly documenting demolition activities and decisions.

*This section is applicable to Subrecipient/Successful Applicants with demolition activity. State demolition case file number in the Client file as reviewed.*

Monitoring Area	Assessment Y,N,N/A
a. Does the Subrecipient/Successful Applicant have a separate file for each demolition project? If the unit was acquired by the Subrecipient/Successful Applicant, the file may be the same as under the Acquisition section of the checklist. If not, determine how the units were chosen for demolition.	
b. Is there evidence that the demolition contract was competitively selected?	
c. Is there evidence that the procurement process meets adopted procedures?	
d. Does the contract meet CDBG-DR requirements? Demolition contracts not subject to Davis Bacon wages unless it is a phase of construction project which is.	
e. Was the Notice to Proceed issued? If yes, note date of the notice to proceed: _____	
f. Are the project inspection reports in AmpliFund?	

g. Is there evidence of final inspection?	
h. Is there evidence of final payment approval?	
i. Did you review the requirements with the Subrecipient/Successful Applicant for replacement of lower income housing lost from the community's stock through federally assisted activities?	
j. Does the Subrecipient/Successful Applicant have a definition of occupiable (i.e., suitable for rehabilitation)?	
k. Is there evidence that the Subrecipient/Successful Applicant submitted the information required from the Residential Anti-Displacement and Relocation Assistance Plan Certification?	
l. Is there a need for follow-up technical assistance?	
<b>Describe Basis for Conclusion:</b>	

# 11 FAIR HOUSING

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## 11.1 APPLICABILITY

Any project working with housing, each year.

## 11.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with all requirements of Fair Housing and Equal Opportunity requirements while administering programs with CDBG-DR funds.

Fair Housing prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. The act has 2 main purpose – prevent discrimination and reverse housing segregation.

## 11.3 SOURCES

- **Chapter 11: Affirmatively Furthering Fair Housing** of CDBG-DR Policy Manual;
- Fair Housing Marketing Strategy;
- Subrecipient Website; and
- Fair Housing Information.

## 11.4 METHODOLOGY

- Review Plan;
- Review Documentation and Activities related to Fair Housing;
- Review most recent PSR for completion of Program Beneficiaries data;
- Examine any eligibility requirements the Subrecipient/Successful Applicant may have established (e.g., in a housing rehab program) to determine whether the criteria or methods of administration may have the effect of subjecting individuals to discrimination on the basis of race, color, sex, or national origin;
- Determine whether any programs are being administered in a manner which tends to limit the number of beneficiaries or level of assistance to beneficiaries based on race, color, national origin, religion, sex, familial status, or handicap;
- Subrecipient/Successful Applicants are to maintain and update this information throughout the project. Subrecipient/Successful Applicants will be asked to show source documentation. All items in this section are to be completed. Note any deficiencies; and

- The Subrecipient/Successful Applicant’s records must contain the following information to document their compliance with the civil rights requirements. For each Subrecipient/Successful Applicant reviewed, check the applicable items for compliance and note any deficiencies.

Monitoring Area	Assessment Y,N,N/A
a. Did the Subrecipient/Successful Applicants provide program beneficiary statistics and source documentation?	
b. Does the Subrecipient/Successful Applicant have a written civil rights/fair housing complaints policy?	
c. Does the Subrecipient/Successful Applicant document what meaningful action was taken to comply with the Title VIII of Civil Rights Act of 1968 concerning affirmatively furthering fair housing?	
d. Did Subrecipient/Successful Applicant establish eligibility requirements (e.g., in a housing rehab program) to determine whether the criteria or methods of administration may have the effect of subjecting individuals to discrimination on the basis of race, color, sex or national origin	
e. Has the Subrecipient/Successful Applicant received any civil rights/fair housing complaints?	
f. Are there any indications that any person or group was denied benefit on the grounds of race, color, national origin, religion, familial status, sex, or handicap?	
<b>Describe Basis for Conclusion:</b>	

## 12 FINANCIAL MANAGEMENT

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### 12.1 APPLICABILITY

All projects each year.

### 12.2 OBJECTIVE

To ensure that the jurisdiction/entity('s) accounting records conform with Federal financial management standards under 2 CFR Part 200 as applicable to allocation(s) of CDBG-DR funds to the jurisdiction.

### 12.3 SOURCES

- **Chapter 4: Financial Management** of the CDBG-DR Policy Manual;
- Subrecipient agreement (or equivalent legal document);
- Chart of accounts;
- General ledger and subsidiary ledgers;
- Financial reports (submitted to the DED);
- Supporting documentation; and
- Inventory of assets.

### 12.4 METHODOLOGY

- Trace jurisdiction's general ledger to its financial statements;
- Review project files for documentation;
- Examine inventory of assets;
- Review status of disbursements in AmpliFund to date prior to conducting performance review;
- Print a copy of the project financial in the Subrecipient/Successful Applicant's AmpliFund record; and
- Print a copy of the disbursement detail report from the Subrecipient/Successful Applicant's financial record.

Monitoring Area	Assessment Y,N,N/A
a. Does the Subrecipient record amount budget for eligible activities.	
b. Does the Subrecipient record an encumbrance/obligation when contracts are executed, purchase orders issued, etc.?	
c. Does the Subrecipient identify expenditures in its accounting records according to eligible activity classifications specified in the statute, regulations, or grant agreement that clearly identify the use of program funds for eligible activities?	
d. Did the record review indicate any instances of ineligible expenditures?	
e. Are charges to the CDBG-DR program for salaries and wages, whether treated as direct or indirect costs, based on payrolls documented in accordance with the generally accepted practice of the governmental unit (or legal entity) and approved by a responsible official(s) of the governmental unit (or legal entity)?	
f. Does the Subrecipient/Successful Applicant have a regular payment cycle to ensure bills are paid promptly? Is there a written policy in place?	
g. Has the Subrecipient/Successful Applicant conveyed to the vendors and contractors the timing of the cycle?	
h. Program costs and obligations can be traced to source documentation (e.g., invoices, billings, contracts, canceled checks, timesheets, etc.).	
i. Subrecipient/Successful Applicant's employee's time spent on the award are supported by timesheets?	
j. Did Subrecipient/Successful Applicant identify the method of accounting for other costs such as copies or supplies if charged to the award?	
k. If the Subrecipient/Successful Applicant charges indirect costs to the program, does the Subrecipient/Successful Applicant have an indirect cost allocation plan which has been approved or acknowledged by DED?	
l. Did the Subrecipient/Successful Applicant identify the correct number of drawdowns?	
<b>Describe Basis for Conclusion:</b>	



## 13 HOUSING REHABILITATION

### 13.1 APPLICABILITY

No program is designed to do housing rehabilitation and it is unlikely that any project will need this checklist.

### 13.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with all requirements of Housing Rehabilitation while administering programs with CDBG-DR funds.

### 13.3 SOURCES

- Lead Based Paint Policy; and
- Program Guidelines.

### 13.4 METHODOLOGY

- Review Documentation and Activities related to Housing Rehabilitation.

### 13.5 PROGRAM STANDARDS AND GUIDELINES

Monitoring Area	Assessment Y,N,N/A
a. Do the standards include the required language regarding removal of existing lead-based paint hazards?	
b. Do the standards prohibit the use of lead-based paint?	
c. Do program guidelines include types and amounts of financial assistance available; determine types(s) of program (streamlined, self-help, Subrecipient/Successful Applicant representing owner).	
d. Do the application forms request sufficient information to determine eligibility (applicant and property), including income eligibility and any exclusions; review income provisions to determine if program exclusively benefits low-to-moderate income households?	
e. Is there a written basis for selection or non-selection in the applications for rehabilitation assistance?	
f. Is there the proper documentation that all applicants have been notified of selection or non-selection?	
g. Do program guidelines include a duplication of benefits review?	

h. Do program guidelines include determination of the feasibility of rehab and treatment of infeasible rehabs?	
i. Do program guidelines include relocation or alternatives to rehab policies, if applicable?	
j. Do program guidelines include a conflict-of-interest provision?	
k. Do program guidelines describe contracting requirements?	
l. Do program guidelines describe the grievance procedure?	
m. Do program guidelines describe operating procedures including those relating to change orders, dispute resolution and acceptance of work?	
n. Was rehabilitation completed on any single building(s) with five (5) or more housing units?	
o. If rehabilitation was completed, is there documentation that the applicant complied with Section 504 accessibility requirements to ensure to the greatest extent feasible that 5% of the units are handicapped accessible and 2% of the units are accessible to persons with sensory impairments?	
<b>Describe Basis for Conclusion:</b>	

## 13.6 REHABILITATION APPLICATION INFORMATION

Monitoring Area	Response
a. How many rehab applications have been received?	
b. How many units are completed?	
c. How many units are in progress?	
d. How many units are in pending?	
e. How is the program publicized and how are applicants solicited? If the Subrecipient/Successful Applicant has brochures or other literature used to publicize program, obtain copies?	
f. How many contractors bid on rehab jobs	
g. How does the Subrecipient/Successful Applicant pre-qualify contractors?	

## 13.7 REHABILITATION CASE FILE

Please check the box indicating the Subrecipient/Successful Applicant has the appropriate document on file.

Subcontractor(s) Checklist	
<input type="checkbox"/>	Completed application.
<input type="checkbox"/>	Duplication of Benefits.
<input type="checkbox"/>	Family Survey.
<input type="checkbox"/>	Title search.
<input type="checkbox"/>	Verification of employment.
<input type="checkbox"/>	Verification of income.
<input type="checkbox"/>	Evidence lead-based paint brochure was received by property owner/occupants.
<input type="checkbox"/>	Letter of clearance from the State Historic Preservation Office Date signed SHPO Bid Package <i>Bids not required if the owner is responsible for contracting the work. Check for central Environmental Review Record file.</i>
<input type="checkbox"/>	Bid advertisement name.
<input type="checkbox"/>	Proof of publication date.
<input type="checkbox"/>	Advertisement provides a clear and accurate description of all requirements and all factors to be used in evaluating bids.
<input type="checkbox"/>	Copies of all bids on file.
<input type="checkbox"/>	Evidence bids were logged.
<input type="checkbox"/>	Written evaluation criteria including criteria for judging responsiveness and reasonableness of bids and responsibility of bidders.
<input type="checkbox"/>	Bid tabulation and recommendation for award based on written criteria date.
<input type="checkbox"/>	Executed contract documents; contract must include work write-up and required language regarding removal of existing lead-based paint hazards and prohibiting use of lead-based paint.
<input type="checkbox"/>	The contractor's written section 3 plan if contract is \$100,000 or more on file.
<input type="checkbox"/>	Executed contract must specify contract amount, time of performance, method schedule of payments, who will be responsible for performing each work item, and must include loan agreement, if applicable; check to see that contract amount is not based on cost plus a percentage of cost.
<input type="checkbox"/>	Notice to proceed Date (must be dated after any right of rescission, period and should specify when work is to begin and is to be completed).

<input type="checkbox"/>	Site inspection reports that are dated and signed; note how often inspections are made.
<input type="checkbox"/>	Requests for partial payments and documentation; documentation must include verification of specific contact work items completed; not whether Subrecipient/Successful Applicant retains a portion of payment due until all work completed record of date and number of partial payments, signed by all parties.

## 14 INTERNAL CONTROLS

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### 14.1 APPLICABILITY

All projects each year.

### 14.2 OBJECTIVE

To assess the adequacy of the jurisdiction/entity('s) internal controls; safeguards of protected personally identifiable information; existence of an organizational chart; and practice of segregating duties and responsibilities.

### 14.3 SOURCES

- Record of assessment;
- Organizational chart; and
- Job descriptions.

### 14.4 METHODOLOGY

- Discuss assessment;
- Determine existence of organizational chart; and
- Examine procedures and job descriptions to assess practice of segregating duties.

## 14.5 INTERNAL CONTROLS CHECKLIST

Monitoring Area	Assessment Y,N,N/A
<p>a. Subrecipient/Successful Applicant established an Internal Control System. <i>This system should include how invoices/billings are received, reviewed, and approved for payment; payment of invoices; receipt of award funds; and reconciliation of local account, including position title or person(s) responsible for each action. Ensure responsibilities are clear through an org chart, policies and procedures, and/or flow charts. Who approves what? Make note of any inadequacies.</i></p>	
<p>b. Does the Subrecipient/Successful Applicant have a regular payment cycle to ensure bills are paid promptly?</p>	
<p>c. Has the Subrecipient/Successful Applicant conveyed to the vendors and contractors the timing of the cycle?</p>	
<p>d. Does the Subrecipient/Successful Applicant have an organizational chart and/or clear roles and responsibilities for staff members?</p>	
<p>e. Is there a clear separation of duties for approving invoices?</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

## 15 NATIONAL OBJECTIVE

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### 15.1 APPLICABILITY

All projects during their first monitoring visit, or again if there is a significant change to the scope or service area of the project.

### 15.2 OBJECTIVE

To review Subrecipient/Successful Applicant(s) national objective/activity eligibility on all HUD-assisted projects, including projects funded partially or in full by CDBG-DR, and all projects implemented or funded by a Nebraska public agency, or that require discretionary approval by a public agency to ensure conformity with related Federal and State guidance.

### 15.3 SOURCES

- Applicable Federal Register Notices;
- Subrecipient's core program policies where National Objective/Activity Eligibility guidelines should reside; and
- Any additional National Objective/Activity Eligibility-specific subrecipient procedures.

### 15.4 METHODOLOGY

- Review general core files for the source documentation;
- Examine proper subrecipient internal control features and if they have been established for conducting, submitting, and approving National Objectives/Activity Eligibility;
- Provide an assessment of those controls by answering the questions below; and
- Include any approved activity amendments and review national objective for scheduled completion phase or award year.

## 15.5 AREA-WIDE BENEFIT

Monitoring Area	Assessment Y,N,N/A
a. Do the Subrecipient's records describe the boundaries of the service area?	
b. Do you agree with the basis/approach the Subrecipient used in determining the service area of this activity?	
c. Does the size of the service area appear reasonable given the nature and scope of the activity?	
d. Is the service area "primarily residential?"	
<b>Describe the basis for conclusion:</b>	

## 15.6 LOW-AND MODERATE-INCOME COMPOSITION OF THE SERVICE AREA

Monitoring Area	Assessment Y,N,N/A
a. Is the percent of low- and moderate-income persons at least 51%?	
b. Does the Subrecipient's documentation show that the correct census data were used and the calculations correctly computed?	
c. Does the size of the service area appear reasonable given the nature and scope of the activity?	
<b>Describe Basis for Conclusion:</b>	



## 15.7 DATA AND SURVEYS

If the Subrecipient or Successful Applicant used a survey rather than the HUD-supplied Census data to determine if a service area qualifies, answer the following:

Monitoring Area	
a. The period for which the income survey of residents of the service area was determined _____	
b. The year used for HUD income limits: _____	
c. Did the survey show the service area was at least 51 percent low- and moderate-income?	Y,N,N/A
d. If “no” to “c”, did the Subrecipient or Successful Applicant survey one or more whole block groups?	Y,N,N/A
e. If “yes” to “d”, did the Subrecipient or Successful Applicant survey all block groups and re-rank them to determine if there was a change in the exception percentage? (If “no,” use of the survey is not acceptable.)	Y,N,N/A
f. If “no” to “e”, did the survey show that the percentage of low- and moderate-income residents was at least equal to or greater than the Subrecipient’s or Successful Applicant’s exception percent, but less than 51% low- and moderate-income? If “no”, the activity does not meet the National Objective.	Y,N,N/A
g. If a survey was used to determine the percent of low- and moderate-income residents in the service area, did ODOC review the survey instrument and methodology and conclude “that the results meet the standards of statistical reliability that are comparable to that of the decennial census for areas of similar size?”	Y,N,N/A
<b>Describe Basis for Conclusion:</b>	

## 16 PROCUREMENT – GENERAL

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### 16.1 APPLICABILITY

All projects for each procurement by the Subrecipient or Successful Applicant.

### 16.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with federal requirements when using accepted CDBG-DR Procurement Methods: Micro-Purchases, Small Purchases, Sealed Bids, Competitive Proposals, and Non-Competitive Proposals. Ensure that the proper method of procurement is being used, and that cost thresholds are respected. This section applies to all programs.

### 16.3 SOURCES

- **Chapter 5: Procurement** of DED’s CDBG-DR Manual;
- Request for Proposals; and
- Bid Proposals.

### 16.4 METHODOLOGY

- Examine the costs of goods/services provided; ensure consistency with federal cost thresholds;
- Check that Subrecipient has obtained a breakdown of proposed costs;
- Review name of vendor, contractor and/or subcontractor, date of procurement, funding source, contract price, description of procured goods/services;
- Review the Subrecipient/Successful Applicant’s procurement records to determine if procedures used in obtaining goods and services are consistent with the Subrecipient/Successful Applicant’s written procurement procedures and code of conduct and are in compliance with 2 CFR 200.317-327;
- Review Procurement process on “Questions List” submitted by Subrecipient/Successful Applicant and documentation provided by Subrecipient/Successful Applicant;
- Review the Subrecipient/Successful Applicant’s procurement process to determine if procedures used in obtaining goods and services are consistent with the Subrecipient/Successful Applicant’s written procurement procedures and code of conduct and comply with 2 CFR § 200.317-327 Attachment, items 7-15, especially item 10; and

- Review and identify procurement effort direct to conduct outreach to minority- and women-owned businesses (MBE/WBE). List all types of services or goods sought.

For each professional services reviewed for procurement, note the following:

- Subrecipient/Successful Applicant is required to procure for professional services unless Subrecipient/Successful Applicant has an in-house professional, has a history of appointment, or a member of a development district is qualified in one of the professional services areas.

## 16.5 GENERAL PROCUREMENT CHECKLIST

This checklist needs to be completed for each procurement.

The following refers to: \_\_\_\_\_

Monitoring Area	Assessment Y,N,N/A
a. Is the Subrecipient/Successful Applicant required to follow 2 CFR 200? <i>Answer can be both yes and no depending on the services.</i>	
b. Did Subrecipient/Successful Applicant submit a copy of RFP or RFQ and lists were sent and/or published.	
c. If “yes” to “b” did the Subrecipient/Successful Applicant contact at least 3 qualified sources?	
d. If published, did the Subrecipient/Successful Applicant provide an Affidavit of Publication?	
e. Does the solicitation have clear and accurate description of all requirements and all factors to be used in evaluating proposals or statements? <i>If solicitation is lacking clear and accurate description of all evaluation factors and their relative importance, this constitutes a finding.</i>	
f. Is there written evaluation criteria including criteria for judging responsiveness of proposals, reasonableness of costs and responsibility of firms?	
g. Is there written statement explaining the basis for selection and basis for selection of contract type.	
h. Was a cost or price analysis completed before receiving bids or proposals?	
i. Did the Subrecipient/Successful Applicant obtain price or rate quotations? <b>Micropurchases may be awarded without soliciting competitive price or rate quotations if the Subrecipient/Successful Applicant considers the price to be reasonable based on research, experience, purchase history or other information and documents its files accordingly.</b>	
j. Was there an indication that a conflict of interest or potential conflict of interest existed in the procurement?	
k. Was there an indication that the procurement proposal was prepared by a firm or individual?	

**Describe basis for conclusion:**

## 17 PROFESSIONAL SERVICES CONTRACTS

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### 17.1 APPLICABILITY

Any project that has procured a professional service contract in the past monitoring period.

### 17.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with Contract Costs and Price requirements while administering programs with CDBG-DR funds. This section is applicable ONLY to programs with outside contract agreements.

### 17.3 SOURCES

- Contracts;
- Cost Estimating Tools & Procedures;
- Independent Estimates;
- Cost Analysis;
- Price Analysis; and
- Bid Proposals.

### 17.4 METHODOLOGY

- Review price analysis procedures;
- Ensure that contract and price correspond to the Subrecipient's award record and original budget/allocation of funding;
- Check that Subrecipient has obtained a breakdown of proposed costs.
- A separate file should be established for each contract. Review the Subrecipient/Successful Applicant's contract file for administration, engineering, housing rehabilitation and appraisal services; and
- For each file reviewed, check the times on file and note any deficiencies.

Professional Services Checklist	
<input type="checkbox"/>	Method of compensation including basis for, frequency of partial payments time of performance/completion date, and appropriateness.
<input type="checkbox"/>	Verify the procurement method is consistent with the CDBG-DR Program policy on multiple services. If not, provide an explanation in the monitoring report.
<input type="checkbox"/>	Time of performance/completion date.
<input type="checkbox"/>	Solicitation has clear and accurate description of all requirements and all factors to be used in evaluating proposals or statements. (2 CFR § 200.320(b)(2) – if solicitation is lacking clear and accurate description of all evaluation factors and their relative importance, this constitutes a finding).
<input type="checkbox"/>	Solicitation clearly states that contract amount will not be based on cost plus, a percentage of cost, or percentage of construction cost. (Must be lump sum, fixed cost not to exceed, etc.) <i>If cost plus a percentage of cost or percentage of construction cost language is present in the solicitation or resulting contract, this constitutes a violation of 2 CFR 200.324(d) resulting in a finding.</i>
<input type="checkbox"/>	Subrecipient/Successful Applicant provided a complete list of all proposals or statements received and uploaded in AmpliFund.
<input type="checkbox"/>	Written evaluation criteria including criteria for judging responsiveness of proposals, reasonableness of costs and responsibility of firms.
<input type="checkbox"/>	Written statement explaining the basis for selection and basis for selection of contract type.
<input type="checkbox"/>	Cost or price analysis completed before receiving bids or proposals (as required in 2 CFR § 200.324).
<input type="checkbox"/>	Check or list type of service(s) (examples of services are administrative, engineering, architectural, planning, appraisal, audit, housing rehabilitation administration, testing).and professional organization.
<input type="checkbox"/>	Check type of service or item sought (examples of services are administrative, engineering/architectural, appraisal, audit, housing rehabilitation administration, testing).
<input type="checkbox"/>	Provide statement on how Subrecipient/Successful Applicant qualified the professional organization as being excluded from the procurement process for professional services.
<input type="checkbox"/>	Review and identify procurement effort directed toward minority-owned and women-owned firms. List all types of services or goods sought.
<input type="checkbox"/>	Review and identify procurement efforts directed toward Section 3 Business Concerns and Section 3 Workers. List all types of services or goods sought. (All CDBG-DR Subrecipients and Successful Applicants must have documentation of Section 3 compliance). <i>If this is in relation to a construction project, please skip to the Construction section.</i>
<input type="checkbox"/>	Provision for amendments/changes to contract.
<input type="checkbox"/>	Clause prohibiting transfer of interest/assignment.
<input type="checkbox"/>	Access to records/maintenance of records.
<input type="checkbox"/>	Conflict of interest clause.

<input type="checkbox"/>	Termination of cause/convenience.
<input type="checkbox"/>	Title VI Clause of Civil Rights Act of 1964.
<input type="checkbox"/>	Section 109 Clause of Housing and Community Development Act of 1974 amended.
<input type="checkbox"/>	Age Discrimination Clause of Age Discrimination Act of 1975.
<input type="checkbox"/>	Rehabilitation Act Clause of Section 504 of Rehabilitation Act of 1973.
<input type="checkbox"/>	Equal Employment Opportunity Provisions of Executive Order 11246.

## 17.5 MINORITY AND WOMEN OWNED BUSINESSES

Monitoring Area	Assessment Y,N,N/A
a. Is the amount fixed or does it include a "Not To Exceed Clause?" <i>Amount cannot be based on cost plus a percentage of cost.</i>	
b. Does the contract execution date precede the Notice of Approval date?  Enter Contract Execution Date: Enter Contract Amount \$: Enter Date Notice of Approval:	
c. Does the contract execution date precede the Notice of Release of Funds date?  Enter date Notice of Release of Funds:	
d. Were minority or woman owned businesses contracted?  Enter Number Contracted: Enter Type of Professional Services Provided: Enter Dollar Amount of Contract: Enter Contract Amount:	
e. List name of Design Contractor:	
f. Is the design contract in progress?	
g. If the design contract is complete, do we have the final deliverables?	
<b>Describe Basis for Conclusion:</b>	

## 18 PROGRAM INCOME

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### 18.1 APPLICABILITY

All projects each year, however, program income is extremely rare.

### 18.2 OBJECTIVE

To ascertain whether the jurisdiction/organization is separately accounting for and tracking any income generated from program activities (This section applies ONLY to programs that have generated income).

### 18.3 SOURCES

- **Chapter 7: Program Income** of the CDBG-DR Policy Manual;
- Subrecipient agreement (or equivalent legal document);
- Chart of accounts;
- General ledger and subsidiary ledgers; and
- Financial reports (submitted to the DED).

### 18.4 METHODOLOGY

- Check Subrecipient Agreement;
- Trace jurisdiction's general ledger to its financial statements; and
- Review project files or reports for documentation.



Monitoring Area	Assessment Y,N,N/A
a. Is there program income? <i>If yes, answer the questions below. If no, no further action needed.</i>	
b. Has the Subrecipient/Successful Applicant used program income to further the activity from which it was generated?	
c. Has the Subrecipient/Successful Applicant expended or committed all available program income prior to drawing down additional CDBG-DR funds?	
d. Has the Subrecipient/Successful Applicant earned program income which is to be committed to a revolving loan fund or a Reuse Plan?	
e. Has the Subrecipient/Successful Applicant submitted a Notice of Intent to use program income? <i>Date must be within 90 days of Notice of Approval.</i>	
f. Has the Subrecipient/Successful Applicant submitted a Reuse Plan for their program income? <i>Date must be within 180 days of Notice of Approval.</i>	
g. Has the Subrecipient/Successful Applicant submitted their first reuse project to DED for approval? <i>Date must be within 24 months from the date of first receipt of program income for a Local Reuse Plan or 36 months for a Regional Plan.</i>	
h. Is Program Income that is received for a revolving loan fund held in a separate interest-bearing account?	
i. Are funds that are held in the revolving loan fund expended for their intended use prior to drawing down CDBG-DR funds for that activity?	
j. Does the Subrecipient/Successful Applicant maintain repayment schedules for all outstanding loans and promptly follow up on all delinquent payments?	
k. If Subrecipient/Successful Applicant has program income or a revolving loan fund from prior awards which must be applied to this award, has the Subrecipient/Successful Applicant expended all program income prior to drawing down CDBG-DR funds under this award?	
<b>Describe basis for conclusion:</b>	

## 19 RECORDKEEPING – GENERAL

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### 19.1 APPLICABILITY

All projects each year.

### 19.2 OBJECTIVE

To ensure transparency, accountability, and compliance for data collection across the CDBG-DR programs and set clear expectations for federal, state, and local stakeholders on what information will be gathered throughout the lifecycle of program activities.

### 19.3 SOURCES

- **Chapter 17: Recordkeeping and Data Management** of the CDBG-DR Policy Manual.

### 19.4 METHODOLOGY

- Manage centralized recordkeeping across Successful Applicants and Subrecipients, who are responsible for collecting data directly from program beneficiaries.

## 19.5 GENERAL RECORDKEEPING CHECKLIST

Monitoring Area	Assessment Y,N,N/A
a. Is there a clearly defined process for acquiring, organizing, storing, retrieving, and reporting information about CDBG-DR funded activities?	
b. Is there a clearly identified person(s) who is properly trained and supported to maintain responsibility for recordkeeping and reporting tasks?	
c. Documentation associated with a project or activity tells a complete story of project eligibility from application to closeout.	
d. Subrecipient/Successful Applicant completes required reporting forms and upload any supplemental documentation to AmpliFund.	
e. Subrecipient/Successful Applicant submits an expense in AmpliFund, attaching all necessary supporting documentation.	
f. Successful Applicant/Subrecipient maintains the five major categories of records (administrative, financial, project, reports, and close-out).	
<b>Describe Basis for Conclusion:</b>	

## 20 RECORDKEEPING – ACCOUNTING

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### 20.1 APPLICABILITY

All projects each year.

### 20.2 OBJECTIVE

To ensure that the jurisdiction/entity('s) accounting records conform with Federal financial management standards under 2 CFR Part 200 as applicable to allocation(s) of CDBG-DR funds to the jurisdiction

### 20.3 SOURCES

- Subrecipient agreement (or equivalent legal document);
- Chart of accounts;
- Drawdown Information; and
- Supporting documentation/correspondence.

### 20.4 METHODOLOGY

- Trace jurisdiction/entity('s) general ledger to its financial statements; and
- Review project files for documentation:
  - Check status of disbursements in AmpliFund and DED Info prior to conducting performance review;
  - Check status of disbursements in AmpliFund and DED Info: draws 25% or greater of the project budget and \$100,000 plus;
  - Print a copy of the project financial in the Subrecipient/Successful Applicant's DED Info record for DED Recipient Detail-Financial; and
  - Print a copy of the disbursement detail report from the Subrecipient/Successful Applicant's financial record in DED Info.

## 20.5 ACCOUNTING RECORDS CHECKLIST

Monitoring Area	Assessment Y,N,N/A
a. What is the specific accounting management system used by the Successful Applicant/Subrecipient (e.g., ledger, computerized system, etc.)? Does this system allow for secure, complete, and accurate documentation?	
b. The Subrecipient/Successful Applicant has a documentation system to allow program costs and obligations to be traced to source documentation (e.g., invoices, billings, contracts, canceled checks, timesheets).	
c. Subrecipient/Successful Applicant's records identify matching and other funds applied to each activity and proper matching percentage has been maintained.	
d. Did the Subrecipient/Successful Applicant's system adequately track local administration costs incurred?	
e. Are Subrecipient/Successful Applicant employees' time spent on the award supported by timesheets?	
f. Did Subrecipient/Successful Applicant identify the method of accounting for other costs such as copies or supplies if charged to the award?	
g. Did the Subrecipient/Successful Applicant charge indirect costs to the program?	
h. If the Subrecipient/Successful Applicant charges indirect costs to the program, does the Subrecipient/Successful Applicant have an indirect cost allocation plan which has been approved or acknowledged by DED (2 CFR 200.414(e)(3))?	
i. Did the Subrecipient/Successful Applicant's records match with reported amounts (i.e., quarterly reports, drawdown requests, audits)?	
j. Did the Subrecipient/Successful Applicant identify the correct number of drawdowns?	
k. Costs are allowable per 2 CFR Part 200 and Subrecipient Agreement/Funding Agreement.	
l. Costs were not obligated prior to the Notice of Release of Funds or Pre-agreement Authorization. <i>Administrative costs should not be obligated prior to the Notice of Approval.</i>	
<b>Describe Basis for Conclusion:</b>	

## 21 RELOCATION

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### 21.1 APPLICABILITY

Any project engaged in any relocation of any entity, residential or non-residential.

### 21.2 OBJECTIVE

To determine if the Subrecipient/Successful Applicant is complying with all federal Relocation requirements. Ensure that records are being maintained adequately while reflecting clearly detailed processes.

### 21.3 SOURCES

- Uniform Relocation Act;
- Household Information Files;
- Notice Information; and
- Waivers, as applicable.

### 21.4 METHODOLOGY

- Confirm that Subrecipient is properly documenting acquisition activities and decisions;
- Review correspondence notices.

This section is applicable to Subrecipient/Successful Applicants providing relocation assistance or Subrecipient/Successful Applicants that have otherwise displaced persons by the use of CDBG-DR funds.

## 21.5 RESIDENTIAL RELOCATION

Monitoring Area	Assessment Y,N,N/A
a. Is the race, ethnic, and gender characteristics of displaced households listed?	
b. Is there documentation of the location of the CDBG-DR-funded activity that caused the displacement?	
c. Did the relocation activities promote fair housing by providing displaced persons with two choices of replacement housing in the community's total housing supply regardless of race, color, religion, sex or national origin?	
d. Were relocation services and benefits to displaced persons and businesses provided in a manner that did not result in different treatment to those persons relocated on account of race, color, sex, or national origin?	
e. Does the Subrecipient/Successful Applicant have a file for each displaced household with demographic information (name, age, sex, marital status, race, disability, monthly gross income)?	
f. Are there any relocation needs of household, such as transportation and moving costs?	
g. Does the displacing activity make it subject to the Uniform Relocation Act Section 104(d)?	
h. Is the notice of relocation adequate?	
i. Was the notice to be issued promptly after the initiation of negotiations?	
j. Is there documentation describing services and assistance provided	
k. Do the referrals to comparable replacement housing include the date of referral, address, sale/rental price, monthly housing cost and date of availability?	
l. Is there a copy of any lease between the Subrecipient/Successful Applicant and occupant?	
m. Is there a copy of the 90-day notice?	
n. Is there a copy of the 30-day notice?	
o. Is there a copy of each relocation claim form together with supporting documentation?	
p. Are there copies of worksheets used to determine benefits?	
q. Do the worksheets contain correct calculations and determination of benefits?	
r. Is there evidence of verification of claim and receipt of payment?	
s. Has the relocation been completed within 6 months following acquisition of property? If no, please provide an explanation of the delay and plan for timely completion in the conclusion section.	

**Describe Basis for Conclusion:**

## 21.6 NON-RESIDENTIAL RELOCATION

The Subrecipient/Successful Applicant should have all of the following items on file for each business displaced. A separate file should be established for each business. Review at least one completed relocation case file and check for the items below, noting any deficiencies.

Non-Residential Relocation Checklist	
<input type="checkbox"/>	Date the occupant was initially contacted.
<input type="checkbox"/>	Name, age, minority-group classification, disabilities of business owner (or principal official).
<input type="checkbox"/>	Provide general information about the relocation.
<input type="checkbox"/>	Address, complete name, telephone number, and type of business.
<input type="checkbox"/>	Approximate annual gross sales, payroll and number of employees.
<input type="checkbox"/>	Size of business by square feet, number of stories, parking area, space leased or owned.
<input type="checkbox"/>	Monthly rental or mortgage cost (not landlord or institution receiving payment).
<input type="checkbox"/>	Number of years in business and at present location.
<input type="checkbox"/>	Evidence of Notice of Relocation Eligibility.
<input type="checkbox"/>	Notice is adequate.
<input type="checkbox"/>	Notice was issued promptly after the initiation of negotiations.
<input type="checkbox"/>	Relocation requirements.
<input type="checkbox"/>	Evidence of referrals and other assistance, including date, address, purchase or rental price, date of availability.
<input type="checkbox"/>	Copy of 90-day notice and evidence of receipt.
<input type="checkbox"/>	Description of Replacement Location.
<input type="checkbox"/>	Address.
<input type="checkbox"/>	Size.



## **22 SECTIONS 504, 508, AND LIMITED ENGLISH PROFICIENCY COMPLIANCE**

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### **22.1 APPLICABILITY**

All projects each year.

### **22.2 OBJECTIVE**

- To determine if the Subrecipient/Successful Applicant is complying with all requirements of Section 504 regulations and requirements while administering programs administered with CDBG-DR funds. Section 504 of the Rehabilitation Act of 1973 is American Legislation that guarantees certain rights to people with disabilities.
- To determine if the Subrecipient/Successful Applicant is complying with all requirements of Limited English Proficiency (LEP) regulations and requirements while administering programs administered with CDBG-DR funds.

### **22.3 SOURCES**

- Section 504 and 508 Policy;
- Section 504 and 508 Reports;
- Subrecipient/ Successful Applicant Website; and
- Language Access Plan.

### **22.4 METHODOLOGY**

- Review Plan; and
- Review Documentation and Activities related to Section 504 and LEP.

If the Subrecipient/Successful Applicant has less than 15 full-time employees, this component does not apply and is resolved.

Monitoring for compliance with Section 504 will focus on five main areas:

- General requirements
- Communications;
- Program accessibility;
- Equal employment opportunity; and
- Physical accessibility.

Monitoring Area	Assessment Y,N,N/A
a. Has the Subrecipient/Successful Applicant designated a Section 504 Coordinator?	
b. Has the Subrecipient/Successful Applicant adopted and implemented Section 508 procedures to ensure that interested persons, including those with impaired visions, or hearing, can obtain information concerning the existence and location of services, activities, facilities?	
c. Does the Subrecipient/Successful Applicant comply with Section 508 for the accessibility of electronic information?	
d. Does the Subrecipient/Successful Applicant have a designated LEP contact person?	
e. Is the Subrecipient/Successful Applicant providing meaningful access to programs and activities (e.g., translation of Vital Documents, Use of Language Line, etc.)?	
<b>Describe Basis for Conclusion:</b>	