

# CHAPTER I

## PROJECT/GRANT ADMINISTRATION

### **Introduction**

The success of a Community Development Block Grant (CDBG) project depends upon careful management and administration.

This involves planning and scheduling, knowledge and responsibility of a variety of management functions, effective oversight of program activities and attention to detail.

The project should be managed to maintain progress and assure compliance. The CDBG policies and regulations are proper, sound business practices for the completion of any public project. The knowledge and understanding of these policies and regulations will allow for a process that will work hand in hand with achieving the desired project goals.

This manual is designed to assist CDBG recipients with project activities and compliance. It contains the regulation, policy or rule, and a number of forms and samples to assist with managing the grant and understanding the process.

The initial project/grant management responsibilities are:

1. Standard procedure
2. Selection of an administrator
3. Duties that are key to the program
4. Recordkeeping
5. Internal monitoring
6. File structure

Careful attention to these matters will help get the project started properly.

### **Other important sections in this chapter:**

- Sample Administration File Structure
- Monitoring Checklists/Desk Review
- Conflict of Interest Policy
- Property Management

## STANDARD PROCEDURE

A variety of procedures exist that must be fulfilled for your CDBG project/grant to be successful. We want to ensure an effective and efficient use of public dollars. The requirements should not be viewed as a hindrance. Rather, they are tools for the community to protect their own and the public's interests as investors in the project. Each area of responsibility is discussed in greater detail in later sections of this handbook.

Briefly, those responsibilities include:

1. **General Program/Grant Management:**

- a. Recordkeeping (saving documents, filing, keeping receipts, etc.)
- b. Financial Management (tracking all of the project dollars)
- c. Citizen Participation (including your citizens in the project)
- d. Procurement (how to purchase materials and select contractor)
- e. Contract and Property Management (who to contract with and what the document should say)
- f. Close-Out and Audit Requirements (how to finalize your project)

2. **Environmental Requirements** – The process that examines what effect your project activities will have on the environment.

3. **Labor Standards** – Payment of state prevailing wage and Federal Davis Bacon wages to all contractor employees.

4. **Civil Rights** – Ensuring equal opportunity under the law.

5. **Acquisition and Relocation** – Protecting landowner and homeowner rights.

Knowledge of these responsibilities allows the community to start initial planning of the administrative structure and processes to make certain that these responsibilities are fulfilled. Decisions must be made about how the program will be administered and who will be responsible for various tasks that must be carried out along the way to program completion.

**REGARDLESS OF THE ADMINISTRATIVE METHOD USED, THE GRANTEE HAS THE RESPONSIBILITY OF SEEING THAT THE GRANT IS CARRIED OUT PROPERLY AND RETAINS LIABILITY FOR THE GRANT.**

## **SELECTING AN ADMINISTRATOR**

There are three basic approaches that the community can take to the management of the CDBG grant.

1. The community may manage the grant itself, using available staff.
2. The community may hire new staff specifically for purposes of managing the grant.
3. The community may contract with a third party (e.g., a regional planning commission or a private consultant) to manage the grant.

Each approach has advantages and disadvantages, and the choice should be made on the basis of careful consideration of the circumstances in the community and the nature of the funded project.

### **Using Current Staff**

This approach has certain advantages. Individuals involved with the project will be familiar with existing administrative routines, and they will know where to go to obtain needed support and information. They will be familiar with the community's goals, particularly if they were involved in planning for the project; thus, they can ensure project implementation in a way that is consistent with those goals. In addition, the use of existing staff eliminates the need to hire and train new staff. It avoids any problems the community might face in working with a third party.

This approach should probably be taken if the community has available staff with sufficient time to undertake the added responsibilities. Staff will either need to work on an overtime, extra-compensation basis, or they will have to defer other activities. Competent staff should be able to manage the program well, if they engage in sufficient administrative planning. Previous work with Federal grants provides important experience, since a variety of Federal laws and regulations apply to project activities.

Regular city staff whose time is committed to the grant project cannot be paid from the grant funds unless they receive overtime pay, their salaries are increased to reflect additional duties associated with the CDBG program, or their job descriptions are temporarily changed to defer or reassign duties. Grant funds are paid to the general fund and the extra pay dispersed through the regular employee-pay method. Only the addition to their salary can be paid from grant funds, and this **must** be approved by DED before such salary costs are incurred. All hours worked on the program must be documented with time sheets for each employee involved, and payment must coincide with hours worked. Suggested employee roles for local administration are included herein.

### **Hiring New Staff**

If current staff does not have sufficient time to administer the project, consideration should be given to hiring additional staff to provide necessary support. The advantage of this approach is that the person or persons hired for this purpose will be on hand on a daily basis and will be able to work closely with local officials in administering the grant. A problem is that it may be difficult to find qualified individuals for temporary, perhaps part-time positions. Again, all employees paid from CDBG funds must document time spent on the grant with timesheets, as payment must be for CDBG work only.

### **Contracting Out**

A third approach is to contract with a regional planning commission or private consultant to provide the necessary support. Many such organizations already have experience with CDBG and similar programs. They can bring considerable expertise to bear and relieve local officials of much of the

burden of administering the grant. Engineering firms may qualify to administer a grant. However, an engineering firm cannot perform both administration and engineering on the same grant.

Someone on city staff should be familiar with project requirements so that the work of an outside administrator can be monitored properly, **as the grantee remains responsible for proper administration**. An administrator is simply another contractor of the community.

No grantee will be penalized if it does not have the capacity to properly administer the grant from existing staff members; rather, they should propose that an outside firm will be contracted or new staff will be hired, as appropriate, to administer the grant. Every grant must be administered by a competent person who will properly oversee the requirements set forth by Federal law and state regulations; therefore, the grantee must be assured competent administration when deciding this issue.

The program administration structure should be guided by the scope and difficulty of the approved CDBG program, prior grant experience, proper internal control, and financial management requirements. For example, a small-scale public facilities project with a single construction contract need not have an elaborate management structure. On the other hand, a housing rehabilitation program or economic development project may involve several contractors, bank negotiations, escrow accounts, the purchase of land and easements and the management of a revolving loan fund.

If the community decides to retain an outside organization to administer the project and proposes to use grant monies as all or part of administration payment, it must use the competitive proposal process (see the Procurement Chapter) to ensure that it receives the best help for the best price. It should use a well-developed contract to govern the relationship between itself and the administrator, specifying carefully the work elements to be completed and the time schedule for completion of the work elements. The community may wish to retain some administrative responsibilities. All such arrangements should be carefully spelled out in any contract.

The Procurement Chapter describes the **required** method of procurement that solicits all known grant administrators and the area RPC.

Contracts for administrative services cannot be on a pro-rated basis as the method of payment (a set amount per month for a pre-determined number of months) if CDBG money is used to pay for administration. As with any contract, payments should be based on monthly cost reimbursement or a percentage payment after milestones in the grant.

**REGARDLESS OF WHAT METHOD IS CHOSEN FOR GRANT ADMINISTRATION, GRANT FILES MUST BE RETAINED AT THE GRANTEE'S OFFICE OF BUSINESS.**

**Financial Management is the responsibility of the grantee, and cannot be contracted out to a grant administrator.**

**Responsible Local Individual:**

One person should be assigned as the point of contact for communication between:

- Grantee and state
- Grantee and administrator
- Grantee and contractors
- Grantee and engineer

## **SUGGESTED ROLES FOR GRANTEE ADMINISTRATION**

As noted, there are several areas of responsibility related to CDBG project/grant management. Also, as noted, there are a variety of approaches that can be taken to administer the project. However, it is useful for a community administering its own grant to think about two essential roles that should be clearly defined: **Community Development Project Manager and Community Development Finance Officer.**

### **Responsibilities of Community Development Project Manager**

The Community Development Project Manager shall have overall project responsibility and shall be the focal point for the resolution of any problems that may develop in the course of project implementation. Specifically, this individual shall have the following responsibilities:

- oversee recipient and contractor compliance with statutory/program requirements
- contact point with DED
- recommend approval of third-party contracts
- recommend approval for purchase orders
- recommend and/or approve invoices/contractor payment
- oversee field review of project activities
- oversee project progress
- oversee CDBG budget/project amendments
- maintain project files
- complete DED reports on project performance
- monitor third-party contracts
- submit final close-out report(s)
- oversee annual audit requirements

### **Responsibilities of the Finance Officer**

The Finance Officer is responsible for maintaining official CDBG financial records. The Finance Officer will be responsible for the following:

- maintenance and control of accounting documents approved for processing by the Community Development Project Manager
- preparation of financial reports based on accounting records
- preparation of grant requisitions (Request For Funds Form) subject to review by Community Development Project Manager
- entry of these and other accounting transactions into the accounting system
- maintenance of financial process files (working files)

In managing CDBG financial resources, there must be an appropriate division of responsibility regarding the request and receipt of CDBG monies. Proper internal control should be exercised to guard against opportunities for waste, fraud, and mismanagement.

## **RECORDKEEPING**

An adequate recordkeeping and filing system for the Missouri CDBG program is essential to document both recipient fulfillment of applicable regulations and accomplishment of program activities. Complete records are necessary for the two major aspects of CDBG audit, financial soundness and program compliance. Without adequate records to support programmatic decisions, even the best performed program will receive an adverse audit. As noted earlier, all files and records must be kept at grantee's business offices and must be available to the public during regular business hours, except confidential files relating to housing and/or economic development. Grantees are required to control grant funds and establish adequate safeguards to protect the records that document CDBG transactions.

### **Record Retention Requirements**

CDBG program records are to be maintained for a period of **five years**.

In the event of litigation, claims or other unresolved legal issues, the five-year period begins with the date noted on the Certificate of Completion. If litigation or other legal matters extend beyond the five-year period following the date on the Certificate of Completion, then the records retention period extends to the date of the final judgment or ruling in the case. The records retention requirement applies to "source documentation." This term refers to any writing that activates a flow of funds. Source documentation comprises purchase orders, invoices, contracts, checks, budget transfer memoranda and other transaction documentation. It also includes writings that verify compliance with nonfinancial components of program administration, such as inspection reports that confirm fulfillment of applicable regulations. For example, if a housing unit is inspected for lead-based paint, an inspection report noting the findings should be completed and filed. Original documents are preferred, but copies are acceptable as source documents.

### **File Management Considerations**

The importance of maintaining a logical and complete filing system cannot be overemphasized. The key consideration in designing any system is that it creates a clear "audit trail." This means that every transaction can be traced from beginning to end. (For example, a simple purchase of goods might begin with a purchase requisition followed by a purchase order that is matched with a receiving report when the goods arrive. These documents are then matched with a vendor's invoice and a check is processed. After appropriate accounting entries are made and the cancelled check is returned, the entire transaction may be filed.) Thus, the purchase may be traced from beginning to end by source documentation. The process of tracing is the primary concern of program auditors. A record and filing system that enables an auditor to quickly and easily trace transactions using source documentation and coding references will generally result in a favorable audit report. **See grant audit requirements in the Close-out Chapter of this manual.**

## **INTERNAL MONITORING**

One of the most important functions undertaken by CDBG grant recipients is monitoring, or grant oversight. The four primary components of CDBG monitoring are progress on planned activities, program compliance, fiscal management and fiscal compliance. This will require development of a monitoring system that will allow recipients to:

- manage their community development program as a whole, and individual projects and activities substantially, as described in the approved CDBG application
- maintain program or project progress
- determine that costs charged to the project are eligible
- ensure that all program activities comply with all applicable laws and regulations and terms of the grant agreement
- eliminate the opportunity for fraud, waste, and mismanagement

The key to successful monitoring of many different contracts simultaneously is to maintain constant contact with the contractors. This can be accomplished by frequent discussions and site visits as well as the formal means of communication. These site visits should include checks of progress toward project milestones, a review of compliance with each contract provision, and confirmation of satisfactory work prior to the approval of each invoice. Only by making these efforts can recipients ensure that CDBG program progress is being maintained as specified by the CDBG contract with DED. Please refer to the Contract Management Chapter in this manual.

Recipients must also develop procedures to monitor internal management. For example, it is absolutely essential that the Request for Release of Funds and Certification be approved by DED prior to the commencement of any CDBG activity other than administration (See the Environmental Review Chapter). Ensuring that program files are properly maintained, that adequate books and records are kept, and that reports to DED are submitted on a timely basis requires a system of internal monitoring.

By properly monitoring their program, recipients can promptly identify problems, make appropriate corrections while activities are ongoing, communicate with subrecipients on a routine basis, and report overall program status at any point in time.

Two suggestions to assist with internal monitoring follow:

1. A recommended file structure
2. A compliance monitoring checklist

### **RECOMMENDED FILE STRUCTURE**

Grant files are divided into categories and are coded to facilitate placement and retrieval of documents. If a recipient has more than one CDBG grant, separate files should be kept to distinguish between grant years. A sample of the CDBG file categories and their contents follows.

## **CDBG ADMINISTRATION FILE STRUCTURE**

Following is a recommended file structure for administering CDBG projects. The structure includes the documentation that should be included in each file. However, please note that this structure is not all-inclusive, but rather a thorough outline. If this structure is followed, grantees should have few, if any, monitoring findings.



### **NATIONAL OBJECTIVE**

-  All income surveys and tabulation sheet, if applicable
-  Documentation of 51% LMI from census information, if applicable
-  Documentation of alleviating slums and blight, if applicable
-  Documentation of meeting an urgent health and safety need, if applicable
-  Verification of income for direct hookups utilizing CDBG funds, including copies of bank statements, tax returns, social security, disability reports, etc.



### **CITIZEN PARTICIPATION**

-  Affidavit of publication for application public hearing
-  Minutes of application public hearing
-  Affidavit of publication for the public hearing held to review grant performance
-  Minutes of performance review public hearing
-  All criticisms, complaints, and grantees' responses to these criticisms and complaints
-  Documentation of actions taken to involve all citizens in implementing the project



### **PROPERTY MANAGEMENT**

-  List of all personal property purchased with CDBG funds
-  Complete register of all property acquired



### **FINANCIAL MANAGEMENT**

-  Copy of the CDBG Administrative Manual
-  Funding Approval/Grant Agreement
-  Checkbook
-  Activity ledger
-  Bank statements and evidence of reconciliation

-  All canceled checks
-  Evidence that CDBG funds are in a non-interest bearing account
-  Copies of all RFFs and supporting invoices reference with check numbers, dates, and amounts paid
-  Cash match documentation including invoices, canceled checks, ledgers, etc. (If downtown revitalization, cash match must be one-for-one match with private investment.)
-  In-kind match documentation including employees, pay per hour, and number of hours worked on project (time sheets)
-  All contract amendments and supporting documentation
-  Copies of SFM01, SFM02, and ACH form
-  Copies of all project audits
-  Copy of the close-out packet
-  Evidence of use of program income as approved by DED, if applicable



## **ENVIRONMENTAL REVIEW RECORD**

-  Environmental Assessment
-  Environmental Assessment Review Letter
-  Affidavit of publication of Combined Notice or NOI/RROF
-  Historic Preservation Clearance (including memorandum of agreement)
-  Other applicable documentation such as floodplain notices, farmland impact rating, etc.
-  Evidence that all notices were sent to the required agencies (Return Receipt or copies of dated and signed letters)
-  All correspondence from CDBG staff (i.e., letters, e-mail logs, phone logs)
-  All comments received and the grantee's responses to these comments
-  Request for Release of Funds and Certification (signed by CEO)
-  Removal of Grant Conditions
-  Notice of Release of Environmental Requirements (for private monies only) (Economic development projects only)



## **EQUAL OPPORTUNITY**

-  Total indirect beneficiaries, including breakdown of LMI, female heads of household, Hispanic, and minorities (Black, Asian, Native Hawaiian/Pacific Islander, Native American, etc.)
-  Total direct beneficiaries, including breakdown of LMI, female heads of household, Hispanic, and minorities, if applicable
-  Total direct beneficiary applicants, including breakdown of female heads of household and minorities (for housing and economic development projects)
-  Evidence that equal opportunity guidelines were followed for persons hired specifically for the CDBG project
-  Section 3 documentation
-  All Contract and Subcontract Activity Reports
-  Documentation of actions taken to further Fair Housing for each subsequent year the grant is open
-  Documentation that Fair Housing impediments have been identified
-  All equal opportunity/civil rights complaints and grantee's response to these complaints



## **PROCUREMENT AND CONTRACT MANAGEMENT**

-  Copy of grantee's procurement and conflict of interest policies
-  Copies of the intergovernmental agreement
-  Evidence that grantee maintains a listing of all MBE, WBE, and Section 3 firms
-  Copies of grantee/subgrantee agreement
-  Approval from DED if less than three bids are received for any contract
-  Evidence that the following certifications and executive orders are in all project contracts (Section 504, Section 109, Age Discrimination Act, Executive Order 11063, Executive Order 11246 (contracts exceeding \$10,000), Section 3 (contracts exceeding \$100,000), and Affirmative Action Plan



### Administration Contract

-  Copy of the Request for Proposals (RFP) identifying all evaluation factors (see sample Administration RFP) (Note: Cost must be a factor.)
-  Evidence that all known area administrators were solicited, including MBE and WBE firms
-  Evidence of the selection criteria for award, including minutes of the meeting

 Documentation that all unsuccessful bidders were notified in writing

 Executed administration contract as well as all proposals received

 Engineering/Architectural Contract

 Copy of the Request for Qualifications (RFQ) identifying all evaluation factors (see sample Engineering/Architectural RFQ) (Note: Cost cannot be a factor.)

 Evidence that all known area engineers/architects were solicited, including MBE and WBE firms

 Evidence of the selection criteria for award, including minutes of the meeting

 Documentation that all unsuccessful bidders were notified in writing

 Executed engineering contract as well as all proposals received

 Construction Contract

 Executed construction contract and bid specifications

 Bid, performance, and payment bonds

 Evidence that bids contain language relating to labor provisions, bonding, and equal employment opportunity

 Documentation that items to be bid are clear and without reference to specific brand requirements

 Labor Standards Provisions as well as the CDBG General Conditions and Supplemental Conditions

 Contractor certifications

 Subcontractor certifications, if applicable

 Correct state and Federal wage rates

 Affidavit of publication for bids in a general circulation newspaper (newspaper of widest circulation in the region)

 Affidavit of publication for bids in minority and trade publications or evidence of direct solicitation

 Documentation of the public meeting held to open bids as well as the bid tabulation

 Small Purchase Contracts, if applicable

 Listing of all vendors solicited, including MBE, WBE, and Section 3 firms, and price quotations

-  Copy of specifications provided to vendors, whether goods or services
-  Executed contract

## **LABOR STANDARDS**

-  Documentation that wage rates were verified within 10 days of opening bids
-  Documentation that the contractor eligibility was verified (disbarment check)
-  The Start of Construction Notice, including copy of DNR construction permit
-  The pre-construction report and minutes
-  Evidence that all contractors and subcontractors are in good standing with the State of Missouri

### Separate payroll file for each contractor and subcontractor

-  All project payrolls complete with names, four digit identification number, work classifications, hourly rates, etc.
-  Statement of compliance for each payroll
-  Documentation of fringes per hour for each classification, if applicable
-  Apprentice documentation, if applicable
-  Payroll review documentation
-  Employee interviews to cover a representative number of trades throughout the project

## **ACQUISITION**

### Separate file for each property acquisition

-  Preliminary acquisition notice to acquire, including invitation to accompany appraiser
-  Documentation that all landowners were provided with the brochure “When A Public Agency Acquires Your Property” (Return Receipt or signed statement)

### Donations

-  Waiver of rights to just compensation and release of grantee’s obligation to an appraisal
-  If not waived, copy of appraisal or determination of value data
-  All required title documentation including deed, recording evidence, etc.



### Voluntary Acquisition

- 📄 Evidence of advertisement or invitation of property solicitation, including non-specific site and option to not acquire if negotiations fail



### Standard Acquisition

- 📄 Appraisal and review appraisal
- 📄 If not appraised, documentation that property valued at less than \$10,000
- 📄 Written offer to purchase, including statement for determining offer (Return Receipt)
- 📄 Evidence of clear title, survey, deed, and legal description
- 📄 Proof of payment
- 📄 Recorded deed
- 📄 Report of Commendation Commissioners if result of condemnation
- 📄 Written notice not to acquire, if applicable (Return Receipt)
- 📄 Rental agreement and short term lease, if applicable
- 📄 Evidence that the grantee has adopted appeal procedures
- 📄 Evidence the property owner was informed of his right to appeal and judicial review (Return Receipt)
- 📄 Evidence of grantee's written determination of appeal (Return Receipt)
- 📄 Evidence of state's written determination of appeal (Return Receipt)



## **RELOCATION**



### Separate file for each relocation

- 📄 Notice of eligibility for relocation assistance (Return Receipt)
- 📄 Evidence tenant was provided with applicable HUD brochure (Return Receipt)
- 📄 Evidence of the 90-day Advance Notice to Move (Return Receipt)
- 📄 Claim forms (e.g., tenant assistance or down payment assistance, replacement housing payment, moving and related expenses, etc.)
- 📄 Evidence of donation if owner donates property in lieu of relocation payment
- 📄 Documentation of payment (relocation and moving expense)

-  Selection of Most Representative Comparable Replacement Dwelling form
-  Evidence that the selected replacement unit was inspected and determined to meet DSS standards
-  Documentation that unit is infeasible to rehab and no comparable unit exists in the grantees jurisdiction, if applicable
-  Evidence that displaced persons were notified of relocation assistance under 104(d), if applicable
-  Grantee's Residential Antidisplacement and Relocation Assistance Plan
-  Grantee's one-for-one replacement plan, if applicable
-  Evidence that the grantee has adopted appeals procedures
-  Evidence of informing individual of his right to an appeal and judicial review (Return Receipt)
-  Notice of Denial of Relocation Assistance Claim, if applicable
-  Evidence of grantee's written determination of appeal (Return Receipt)
-  Evidence of state's written determination of appeal (Return Receipt)



## **ECONOMIC DEVELOPMENT (INCLUDING MICROENTERPRISE)**

-  Current payroll listing, including dates of hire
-  Employment Status Statements for all employees hired after job creation start date and completed summary sheet
-  Summary sheet indicating demographic data for all job applicants
-  Summary of private investment with supporting invoices and/or canceled checks
-  If speculative building, evidence of marketing the building
-  Documentation of repayment of program income, if applicable
-  If microenterprise, copies of loan documents to individual businesses
-  If microenterprise, LMI status of owner, if applicable

## **MONITORING CHECKLISTS**

Depending upon the complexity of the project and the familiarity of the grantee with CDBG, a project may be formally monitored either one or two times. The monitoring will be scheduled well in advance with the community and their administrator.

Technical assistance visits may also be made by staff, if requested or determined that it would best suit the grantee and the State's investment of grant dollars. Technical assistance visits are made to assist the grantee toward achieving successful project completion. The experience of the staff toward problem resolution and recommending alternative solutions is a source and a benefit that every grantee needing assistance should utilize.

The following checklists are provided for the benefit of the grantee. They contain the review of every area of compliance for which the grantee is responsible, and they represent the same documents that the field representative uses in determining the performance of the grantee.

CDBG Administrative Manual  
Project/Grant Administration  
**CDBG General Monitoring Checklist**

**Grantee:** \_\_\_\_\_ **Project Number:** \_\_\_\_\_

Monitoring Date: \_\_\_\_\_  
Monitoring Type: \_\_\_\_\_  
Monitoring Conducted By: \_\_\_\_\_  
Grantee Staff Present: \_\_\_\_\_  
\_\_\_\_\_

CDBG award amount: \_\_\_\_\_  
CDBG award date: \_\_\_\_\_  
Projected close-out date: \_\_\_\_\_  
Amount of CDBG funds remaining: \_\_\_\_\_  
Percent of construction complete: \_\_\_\_\_  
Percent of admin. paperwork complete: \_\_\_\_\_  
Previous monitoring date: \_\_\_\_\_  
Date findings due: \_\_\_\_\_  
Date findings resolved: \_\_\_\_\_  
Type of acquisition involved: \_\_\_\_\_  
Source of acquisition funding: \_\_\_\_\_  
Acquisition timing around first public hearing: **Before**      **After**

Elected Official: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Phone #: \_\_\_\_\_

Administrator: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Phone #: \_\_\_\_\_

Subrecipient: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

Phone #: \_\_\_\_\_

**National Objective**

National Objective of the project (circle one): **LMI** **Slums and Blight** **Urgent Health & Safety Needs**

Percent of benefit shown on application (funding approval): \_\_\_\_\_

Benefit is: **Citywide** **Target Area** **Limited Clientele** **Housing Only** **Economic Development**

**LMI**

How was it determined (circle one):

**Local Income Survey** **U.S. Census Data** **Other (specify):** \_\_\_\_\_

If by survey, was 100% solicitation proven? **Yes** **No**

Was 80% return rate achieved? **Yes** **No**

Actual tabulation of survey in field:

Total Persons: \_\_\_\_\_ # LMI: \_\_\_\_\_ % LMI: \_\_\_\_\_

Total Families: \_\_\_\_\_ # LMI: \_\_\_\_\_ % LMI: \_\_\_\_\_

In accordance with application? **Yes** **No**

If No, explain: \_\_\_\_\_

Did any change in the project scope affect a change in the beneficiaries? **Yes** **No**

If so, were new beneficiaries surveyed? **Yes** **No**

If so, is the national objective still being met? **Yes** **No**

**Slums and Blight**

Activity is identified as:

**Area** **Spot** **Infeasible to Rehab** **Chapter 353** **Local dangerous building code**

Project includes supporting documentation? **Yes** **No**

Spot slums and blight: All structures vacant for 12 months prior to demolition? **Yes** **No**

Area CDBG funds used to address deteriorated conditions? **Yes** **No**

**Urgent Health and Safety Needs**

Problem is identified as: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

**Citizen Participation**

Are grant records kept at grantee's office? **Yes** **No**

Is documentation of public hearing available in the grantee files? **Yes** **No**

Has the grantee conducted a public hearing on the status of funded activities? **Yes** **No**

When was the notice of the public hearing published or posted? \_\_\_\_\_

Where was the notice of public hearing published or posted?

Newspaper name or location: \_\_\_\_\_

Date: \_\_\_\_\_

When was the public hearing?

Date: \_\_\_\_\_

Time: \_\_\_\_\_

Location: \_\_\_\_\_

Are there minutes of the public hearing? **Yes** **No**

Is there an affidavit of publication on file? **Yes** **No**

Were all public hearings accessible to handicap (disabled) persons? **Yes** **No**

Did the grantee provide an interpreter for persons who requested one in order to participate in public hearings? **Yes** **No** **Not requested**

Have any criticisms or complaints been received in writing regarding the program? **Yes** **No**

If Yes, how were they handled? \_\_\_\_\_

\_\_\_\_\_

List any additional ways the grantee has demonstrated efforts to involve citizens throughout all stages of the project: \_\_\_\_\_

\_\_\_\_\_

**Section 504 ADA/Accessibility and Disability Compliance**

Has the grantee completed a self-evaluation of program access? **Yes** **No**

Does the grantee have 15 or more employees? **Yes** **No**

If Yes, has the grantee completed a Section 504 Accessibility Transition Plan based on the results of the self-evaluation? **Yes** **No**

Has the grantee designated a Section 504 Coordinator? **Yes** **No**

Provide name and title: \_\_\_\_\_

Has the grantee adopted a written grievance procedure to resolve complaints regarding Section 504 Accessibility? **Yes** **No**

COMMENTS: \_\_\_\_\_

**Property Management**

Was any personal property purchased with CDBG funds? **Yes** **No**  
If Yes, complete remaining questions.

Is CDBG funded, nonexpendable personal property identified with an inventory tag or other control? **Yes** **No**  
If Yes, list tagged items: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If any real property was purchased, was it titled correctly to the owner (either the grantee or not-for-profit)? **Yes** **No**  
If Yes, is the real property deed restricted to prevent resale for undue enrichment? **Yes** **No**  
If Yes, is the deed restricted for twenty years? **Yes** **No**

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

**Financial Management**

<b>CASH</b>	Does the grantee record all cash transactions in a consistent, centralized system?	<b>Yes</b>	<b>No</b>	
	Does the grantee use activity ledgers to track expenditures by activity?	<b>Yes</b>	<b>No</b>	
	Are RFFs based on either work completed and invoiced or projected cash needs?	<b>Yes</b>	<b>No</b>	
<b>BANK STATEMENT RECONCILIATION</b>	Are fund/activity balances reconciled to bank statements monthly?	<b>Yes</b>	<b>No</b>	
	Is the bank statement reconciliation documented?	<b>Yes</b>	<b>No</b>	
	Is the person reconciling monthly bank statements prohibited from signing checks?	<b>Yes</b>	<b>No</b>	
	Are two signatures required on all checks?	<b>Yes</b>	<b>No</b>	
	If No, is the person writing checks prohibited from signing them?	<b>Yes</b>	<b>No</b>	
	Is the person authorized to sign checks different from the person who signs RFFs?	<b>Yes</b>	<b>No</b>	
	Check a sample of canceled checks. Are all dates, payee, amounts, endorsements, and signatures proper?	<b>Yes</b>	<b>No</b>	
	Did the grantee spend all cash in excess of \$1000 within the 5 days allowed?	<b>Yes</b>	<b>No</b>	
	Is the CDBG bank account non-interest bearing?	<b>Yes</b>	<b>No</b>	
	If No, was the interest returned to DED?	<b>Yes</b>	<b>No</b>	
	If the grantee was required to use matching funds, is there a record of all matching Funds used, including supporting documentation?	<b>Yes</b>	<b>No</b>	
<b>MATCHING FUNDS</b>	Documentation:			
		Funding Approval	Amount	
	Cash match	_____	_____	
	In-kind match	_____	_____	
	Other	_____	_____	
Private match	_____	_____		
<b>MATCHING FUNDS</b>	Did the grantee expend the amount of matching funds pledged in the application (FA)?	<b>Yes</b>	<b>No</b>	
	Is there any evidence of CDBG funds used to reimburse local funds expended prior to environmental release of CDBG funds?	<b>Yes</b>	<b>No</b>	
	Is there any evidence of CDBG funds used to reimburse local funds expended prior to the grant award date?	<b>Yes</b>	<b>No</b>	
	If Downtown Revitalization, is there a dollar-for-dollar match of eligible private investment funds?	<b>Yes</b>	<b>No</b>	
<b>AUDIT TRAIL</b>	Are all accounting transactions supported by invoice?	<b>Yes</b>	<b>No</b>	
	Are invoices properly referenced with check numbers, dates, RFF numbers, funding sources, and amounts paid?	<b>Yes</b>	<b>No</b>	
	Are all expenses allowable per grant agreement?	<b>Yes</b>	<b>No</b>	
	For in-kind or local labor, are payrolls supported by time sheets?	<b>Yes</b>	<b>No</b>	
<b>PROGRAM INCOME</b>	If earned, was program income disclosed in financial records?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Was program income used for eligible activities?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Was the eligible expenditure of program income approved by DED prior to use?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
	Are all reports on program income current with DED requirements?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

COMMENTS: \_\_\_\_\_

**Environmental**

Is there an Environmental Review Record (ERR) containing all original documents available for public review at the grantee’s address?	<b>Yes</b>	<b>No</b>	
Does the ERR contain the originally-signed ‘Determination of Level of Environmental Review’ form?	<b>Yes</b>	<b>No</b>	
Does the ERR contain the originally-signed ‘Finding of Exemption’ form?	<b>Yes</b>	<b>No</b>	
If the project is Categorically Excluded <u>not Subject to</u> laws and authorities at 58.5 (CENST), does the ERR contain the originally-signed ‘Categorically Excluded Not Subject To’ form?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If the project is Categorically Excluded <u>Subject to</u> laws and authorities at 58.5 (CEST), Does the ERR contain the originally-signed Statutory Checklist and all supporting Documentation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the project convert to Exempt?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, does the ERR contain the ‘Notice of Intent to Request Release of Funds’ public notice?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain the affidavit of publication and/or tear sheet?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If the project required an Environmental Assessment (EA), does the ERR contain the originally-signed EA and all supporting documentation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain the ‘Combined Notice’ (Notice of Intent to Request Release of Funds and Finding of No Significant Impact)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain the affidavit of publication and/or tear sheet?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain proof of distribution to environmental agencies and Tribes, if applicable? (certified mail receipts and/or cover letters & stamped envelopes)	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the project require completion of HUD’s 8-Step Decision Making Process for Floodplains and/or Wetland?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If Yes, does the ERR contain the following items:			
<u>Early Public Notice:</u>			
Copy of the Early Public Notice, affidavit of publication and/or tear sheet, proof of distribution of the notice to environmental agencies and Tribes, if applicable		<b>Yes</b>	<b>No</b>
Written comments from the public and RE written responses	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<u>Notice of Explanation:</u>			
Copy of the Notice of Explanation, affidavit of publication and/or tear sheet, proof of distribution of the notice to environmental agencies and Tribes, if applicable		<b>Yes</b>	<b>No</b>
Written comments from the public and RE written responses	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain the originally-signed Request for Release of Funds and Certification Form HUD-7015.16 (RROF/C)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the ERR contain one of the following originally-signed release of funds formats?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

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Pre-Grant Award Environmental Approval Letter	<b>Yes</b>	<b>No</b>
If Yes, Date: _____		
Authority to Use Grant Funds form	<b>Yes</b>	<b>No</b>
If Yes, Date: _____		

Is there any evidence that funds from any source were expended (except for Exempt or CENST activities) and/or choice limiting actions undertaken by any source (acquisition including easements, site preparation, excavation, new construction, rehabilitations/renovations, demolition) prior to the date of DED's release of funds?

<b>Yes</b>	<b>No</b>	<b>N/A</b>
------------	-----------	------------

Were conditions for approval and/or mitigation measures required as a condition of DED's release of funds?

<b>Yes</b>	<b>No</b>	<b>N/A</b>
------------	-----------	------------

    If Yes, does the documentation exist as evidence that each condition was successfully implemented and/or approved by authorizing agencies and/or Tribes?

<b>Yes</b>	<b>No</b>
------------	-----------

    If No, explain why and provide the RE's timeframe and plan for completing and documenting conditions for approval: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Does the ERR include all environmental review amendments completed during the project and DED's approval of all amendments?

<b>Yes</b>	<b>No</b>	<b>N/A</b>
------------	-----------	------------

Did the project require a tiered review approach?

<b>Yes</b>	<b>No</b>
------------	-----------

    If Yes, does the ERR contain all Tier II Reviews and DED approval of each review?

<b>Yes</b>	<b>No</b>
------------	-----------

Does this monitoring indicate any need for follow-up monitoring or technical assistance by DED's Environmental Officer?

<b>Yes</b>	<b>No</b>
------------	-----------

Based on review of the ERR, is the RE in compliance with HUD's 24 CFR Part 58 regulation and DED's environmental review requirements and processes?

<b>Yes</b>	<b>No</b>
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    If No, explain: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

COMMENTS: \_\_\_\_\_

**Equal Opportunity/Fair Housing**

**CDBG EMPLOYMENT**

Were any persons employed by the grantee specifically for the project? **Yes No N/A**  
 If Yes, specify: \_\_\_\_\_

Did the grantee include equal opportunity guidelines in their advertising for positions paid by grantee? (See the Financial Management page, Section 4.D, if Yes to above.) **Yes No N/A**

**FAIR HOUSING EFFORTS**

List the actions the grantee has taken to affirmatively further Fair Housing. The grantee must conduct action each year (12 month period) of the project, beginning with the grant award date.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Are the grantee's official actions to affirmatively further Fair Housing current? **Yes No N/A**  
 List the actions the grantee has taken to address the Analysis of Impediments to Fair Housing Choice. The grantee must conduct an action each year (12 month period) of the project, beginning with the grant award date.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Are the actions to the Analysis of Impediments to Fair Housing Choice current? **Yes No N/A**

**MBE/WBE/DBE-Section 3 Procurement Lists:**

Was above list provided for construction activities?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was above list provided for professional services activities?			
Engineering Firms	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Architectural Firms	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Grant Administration	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Appraisers	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Review Appraisers	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Titles Services	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Other Professional Services	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**CR-4 Report:** Is grantee current with Contractor and Subcontractor Activity Report Submissions? **Yes No**

**Section 3 Report:** Is grantee current with annual Section 3 Summary Report Submissions? **Yes No**

**COMPLAINTS**

Have any <i>written</i> equal opportunity/civil rights complaints been received?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were the complaints handled appropriately?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Should the Missouri Human Rights Commission or HUD be contacted?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**COMMENTS:** \_\_\_\_\_

**Procurement**

GENERAL REQUIREMENTS

Does the grantee have a written procurement policy?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Date adopted: _____			
Does the grantee have a written conflict of interest policy?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Date adopted: _____			
Whose procurement policy was used in this project? Was it implemented correctly?	_____		
	<b>Yes</b>	<b>No</b>	<b>N/A</b>

PROFESSIONAL SERVICES

	<u>Administration</u>		<u>Engineering</u>		<u>Other</u>	
Did the grantee correctly prepare an RFP for administrators/professional service providers and RFQ for engineers/architects?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Did the RFP/RFQ identify the appropriate evaluation factors?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Was the RFP/RFQ published in the newspaper of widest circulation in the county?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Was the solicitation of the RFP/RFQ adequate? (all firms on the CDBG administrator list contacted?)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Was the RFP/RFQ published in a minority newspaper? If No, were an adequate number of MBE/WBE firms directly solicited?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Does the grantee have minutes of contract award? If not award to the lowest bidder, are selection criteria available?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Were unsuccessful bidders notified in writing?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Did the grantee receive approval if less than three bids/proposals were received?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>

CONSTRUCTION

Did the grantee use competitive sealed bids (contracts over \$25,000)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement require a bid bond, cashier's check, or other acceptable method for 5% of the bid?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement contain language relating to labor provisions, state & Federal prevailing wage certifications, bonding, Section 3, and equal employment opportunity (EEO)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

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Were descriptions of items/services on the invitation to bid clear and without reference to specific brand requirements unless the brand was used as an example of functional or quality requirements?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were bids advertised in the newspaper of widest circulation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, were an adequate number of MBE/WBE/Section 3 firms directly solicited?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the Federal wage decision verified prior to opening bids?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a public meeting held to open bids and minutes in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were fewer than three bids received for any contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If Yes, did the grantee receive approval prior to awarding contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the contract awarded to the lowest responsible bidder?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, explain: _____			
<hr/>			
Does the grantee have minutes of contract award?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were unsuccessful bidders notified in writing?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b><u>SMALL PURCHASES (less than \$25,000)</u></b>			
Is there documentation of vendors, price quotations, and dates? (telephone bids, faxed Bids, emails)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the list of vendors include:			
MBE/WBE firms?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Section 3 firms?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was selection purchased fairly?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a purchase order/contract issued to the most advantageous vendor?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b><u>NONCOMPETITIVE PROPOSALS (Must be pre-approved by DED)</u></b>			
Was the desired item available from only one source?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, were costs eligible?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the grantee receive authorization for noncompetitive negotiation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was competition determined to be inadequate after soliciting all known sources?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were the goods or services needed immediately to meet a public emergency?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
COMMENTS: _____			

**Contract Management (Administration)**

Did the grantee contract for administrative services?	<b>Yes</b>	<b>No</b>
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does this date precede the award date?	<b>Yes</b>	<b>No</b>
If Yes, is there a contingency clause?	<b>Yes</b>	<b>No</b>
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>
Does the contract include all required language?		
Affirmative action plan for professional services	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>
Title VI, Civil Rights Act of 1964	<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)	<b>Yes</b>	<b>No</b>
Section 109	<b>Yes</b>	<b>No</b>
Section 503	<b>Yes</b>	<b>No</b>
Section 504	<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>
Executive Order 11246 (only over \$10,000)	<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)	<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)	<b>Yes</b>	<b>No</b>

**Contract Management (Engineering/Architectural)**

Did the grantee contract for engineering/architectural services?	<b>Yes</b>	<b>No</b>
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does this date precede the award date?	<b>Yes</b>	<b>No</b>
If Yes, is there a contingency clause?	<b>Yes</b>	<b>No</b>
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>
Does the contract include all required language?		
Affirmative action plan for professional services	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>
Title VI, Civil Rights Act of 1964	<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)	<b>Yes</b>	<b>No</b>
Section 109	<b>Yes</b>	<b>No</b>
Section 503	<b>Yes</b>	<b>No</b>
Section 504	<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>
Executive Order 11246 (only over \$10,000)	<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)	<b>Yes</b>	<b>No</b>
Does the contract provide optional services at an additional cost?	<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)	<b>Yes</b>	<b>No</b>

**Contract Management (Other Professional Services)**

Did the grantee contract for other professional services?	<b>Yes</b>	<b>No</b>
What is the service? _____		
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does this date precede the award date?	<b>Yes</b>	<b>No</b>
If Yes, is there a contingency clause?	<b>Yes</b>	<b>No</b>
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>
Does the contract include all required language?		
Affirmative action plan for professional services	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>
Title VI, Civil Rights Act of 1964	<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)	<b>Yes</b>	<b>No</b>
Section 109	<b>Yes</b>	<b>No</b>
Section 503	<b>Yes</b>	<b>No</b>
Section 504	<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>
Executive Order 11246 (only over \$10,000)	<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)	<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)	<b>Yes</b>	<b>No</b>

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

**Contract Management (Construction)**

Did the grantee contract for this service?	<b>Yes</b>	<b>No</b>
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>
Were there any change orders?	<b>Yes</b>	<b>No</b>
Were the change orders approved by the grantee?	<b>Yes</b>	<b>No</b>
Does the contract include?		
Certification of Bidder Equal Employment Opportunity	<b>Yes</b>	<b>No</b>
Certification of Proposed Subcontractor Equal Employment Opportunity	<b>Yes</b>	<b>No</b>
Relevant State prevailing wage determination	<b>Yes</b>	<b>No</b>
Relevant Federal prevailing wage determination	<b>Yes</b>	<b>No</b>
General Conditions ( <i>CDBG or equivalent</i> )	<b>Yes</b>	<b>No</b>
<b>HUD Supplemental Conditions contain:</b>		
*Executive Order 11246	<b>Yes</b>	<b>No</b>
*Affirmative action goals	<b>Yes</b>	<b>No</b>
*Section 3	<b>Yes</b>	<b>No</b>
<b>Summary of Civil Rights Laws, Executive Orders and Regulation contain:</b>		
*Title VI, Civil Rights Act of 1964	<b>Yes</b>	<b>No</b>
*Title VIII, Civil Rights Act of 1968	<b>Yes</b>	<b>No</b>
*Section 109	<b>Yes</b>	<b>No</b>
*Section 503	<b>Yes</b>	<b>No</b>
*Section 504	<b>Yes</b>	<b>No</b>
*Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>
*Executive Order 11063	<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)	<b>Yes</b>	<b>No</b>
Federal Labor Standards Provision	<b>Yes</b>	<b>No</b>
Section 3 Plan Format ( <i>If applicable</i> )	<b>Yes</b>	<b>No</b>
Section 3 Contractor Tables (A, B, C, D) ( <i>If applicable</i> )	<b>Yes</b>	<b>No</b>
Have Tables C & D been updated? ( <i>If applicable</i> )	<b>Yes</b>	<b>No</b>
Certificate of Contemplated MBE, WBE & Section 3 Business ( <i>If applicable</i> )	<b>Yes</b>	<b>No</b>
Missouri Public Works Projects Contractor Check-Off List	<b>Yes</b>	<b>No</b>
Termination clause	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>
Architect or Engineer Certification for Acceptance and Final Payment	<b>Yes</b>	<b>No</b>
Do the grantee construction records include the following (in compliance with CDBG limits):		
Bid guarantees?	<b>Yes</b>	<b>No</b>
Performance bond?	<b>Yes</b>	<b>No</b>
Payment bond?	<b>Yes</b>	<b>No</b>

COMMENTS: \_\_\_\_\_

**Labor Standards**

GENERAL

Are Federal and State wage decisions correct as shown in the contract(s)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Are all contractors and subcontractors licensed to do business in Missouri, registered in good standing with the Secretary of State’s office (unless a sole proprietorship with non-fictitious name), and not appearing on any applicable Federal and State debarred lists?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is the contractor Surety verification clearance letter in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is the CDBG Start of Construction Notice on file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is the Pre-Construction Conference Report on file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is there a bulletin board in a central location at the worksite where EEO provisions, wage determinations, health and safety regulations, Dept. of Labor wage notices, and the bilingual EEO notice are posted?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

PAYROLL REVIEW

Was the first payroll submitted to DED for each contractor and subcontractor?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Are payrolls signed by employer or authorized representatives?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a statement of compliance submitted with each payroll?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is the employer IRS identification number on record?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Do the payrolls contain the following for each employee:			
Name and specific four-digit identifying number?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Work classification?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Hourly rates of wages paid?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Daily number of hours worked (including any overtime)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Weekly number of hours worked (including any overtime)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Deductions shown (when applicable)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Gross and net wages paid?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Do wages shown on payrolls equal or exceed the rates in the wage decisions?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If split work classifications were used, are separate daily time records shown?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If fringe benefits were paid into approved plans/funds/programs, has the hourly equivalent amount been documented?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were additional classifications (if necessary) obtained from USDOL?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has the grantee documented review and approval of payrolls?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has overtime been correctly paid?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Have OSHA cards been submitted for each employee?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the Prevailing Wage Project Notification – Contractor Information form on file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is the Missouri Public Works Projects Public Body Check-off List on file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

EMPLOYEE INTERVIEWS

Identify all contractor(s) and subcontractor(s), with number of employee interviews conducted: \_\_\_\_\_

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Were a representative number of trades covered for each firm?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were interviews compared against payrolls for compliance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were interviews compared against wage rates for compliance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were interviews signed by the interviewer and verified by the payroll examiner (labor standards officer)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>



**Acquisition**

What type of acquisition was required?

Full Title	<b>Yes</b>	<b>No</b>
Permanent Easement	<b>Yes</b>	<b>No</b>
Long Term Lease	<b>Yes</b>	<b>No</b>
Right of Way	<b>Yes</b>	<b>No</b>
Temporary Easement (if checked, not subject to Uniform Act)	<b>Yes</b>	<b>No</b>
Acquired from another public entity (if checked, not subject to Uniform Act)	<b>Yes</b>	<b>No</b>

Is there a separate file for each necessary acquisition? **Yes** **No**

Property Owner's Name: \_\_\_\_\_

Proof of ownership*	Prelim-Acquisition Letter & HUD Brochure**	Waiver of Right to Just Compensation
Waiver of Right to an Appraisal	Copy of appraisal***	Copy of Review appraisal
Review of available market data****	Written offer to purchase**	Proof of receipt of payment*****
Recorded acquisition instrument*****		

Property Owner's Name: \_\_\_\_\_

Proof of ownership*	Prelim-Acquisition Letter & HUD Brochure**	Waiver of Right to Just Compensation
Waiver of Right to an Appraisal	Copy of appraisal***	Copy of Review appraisal
Review of available market data****	Written offer to purchase**	Proof of receipt of payment*****
Recorded acquisition instrument*****		

Property Owner's Name: \_\_\_\_\_

Proof of ownership*	Prelim-Acquisition Letter & HUD Brochure**	Waiver of Right to Just Compensation
Waiver of Right to an Appraisal	Copy of appraisal***	Copy of Review appraisal
Review of available market data****	Written offer to purchase**	Proof of receipt of payment*****
Recorded acquisition instrument*****		

Property Owner's Name: \_\_\_\_\_

Proof of ownership*	Prelim-Acquisition Letter & HUD Brochure**	Waiver of Right to Just Compensation
Waiver of Right to an Appraisal	Copy of appraisal***	Copy of Review appraisal
Review of available market data****	Written offer to purchase**	Proof of receipt of payment*****
Recorded acquisition instrument*****		

Property Owner's Name: \_\_\_\_\_

Proof of ownership*	Prelim-Acquisition Letter & HUD Brochure**	Waiver of Right to Just Compensation
Waiver of Right to an Appraisal	Copy of appraisal***	Copy of Review appraisal
Review of available market data****	Written offer to purchase**	Proof of receipt of payment*****
Recorded acquisition instrument*****		



**Relocation**

GENERAL

Is there a separate relocation file for each displacee? **Yes** **No** **N/A**

NOTICES

Did the displacee receive the grantee’s Notice of Eligibility for Relocation Assistance? **Yes** **No** **N/A**

    Hand delivered signed receipt? **Yes** **No** **N/A**

    Certified mail receipt? **Yes** **No** **N/A**

Did the displacee receive the applicable HUD brochure? **Yes** **No** **N/A**

    If Yes, which brochure was received?

        “Relocation Assistance to Tenants Displaced from their Homes” **Yes** **No**

        “Relocation Assistance to Displaced Homeowners” **Yes** **No**

        “Relocation Assistance to Displace Business, Nonprofit Organizations,  
        and Farms” **Yes** **No**

    Hand delivered signed receipt? **Yes** **No** **N/A**

    Certified mail receipt? **Yes** **No** **N/A**

If applicable, did the displacee receive the 90-day Advance Notice to Move? **Yes** **No** **N/A**

    Hand delivered signed receipt? **Yes** **No** **N/A**

    Certified mail receipt? **Yes** **No** **N/A**

    Date of Notice: \_\_\_\_\_

    Date occupant require to move: \_\_\_\_\_

RENTAL AGREEMENTS

If the grantee permitted an owner or tenant to occupy the real property acquired, was the rent charged equivalent to the fair rental value of the property? **Yes** **No** **N/A**

Is there a short-term lease agreement in the file? **Yes** **No** **N/A**

DETERMINATION OF DISPLACEE NEEDS BY GRANTEE

For Families and individuals, are the following claim forms in the file:

    Tenant Assistance or Downpayment Assistance? **Yes** **No** **N/A**

    Replacement Housing Payment for 180-Day Homeowners? **Yes** **No** **N/A**

    Moving and Related Expenses? (circle one) **Fixed** **Actual** **Yes** **No** **N/A**

For businesses, nonprofit organizations, and farm operations, are the following claim forms in the file:

    Actual Reasonable Moving and Related Expenses? **Yes** **No** **N/A**

    Fixed Payment in Lieu of Payment for Actual Moving and Related Expenses? **Yes** **No** **N/A**

DONATION OF DEPLACEE PROPERTY

Did the displacee donate their property in lieu of relocation payment? **Yes** **No** **N/A**

    If Yes, was a signed donation/waiver in the file? **Yes** **No** **N/A**

    Hand delivered signed receipt? **Yes** **No** **N/A**

    Certified mail receipt? **Yes** **No** **N/A**

PAYMENT DOCUMENTATION

Is there payment documentation for (i.e., copy of canceled check):

    Relocation assistance? **Yes** **No** **N/A**

    Moving expenses? **Yes** **No** **N/A**

**COMPARABLE REPLACEMENT UNIT DOCUMENTATION**

Is the “Selection of Most Representative Comparable Replacement Dwelling” form in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a referral to at least one comparable replacement dwelling included in the notice of eligibility for relocation assistance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Is there evidence that the grantee inspected the replacement dwelling to determine that it met the decent, safe, and sanitary standards?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**LAST RESORT UNIT DOCUMENTATION**

Have the grantee determined that:			
The unit is not feasible to rehabilitate? (i.e., rehabilitation cost estimate exceeds \$15,000)	<b>Yes</b>	<b>No</b>	<b>N/A</b>
No comparable replacement unit exists in the grantee’s jurisdiction? (i.e., copy of letter from realtor addressing the unavailability of comparable replacement units)	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**INTERVIEW OF PROJECT DISPLACEE**

Did the displacee receive notice of eligibility for relocation assistance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the grantee’s relocation assistance payment adequate?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the grantee’s moving expenses payment adequate?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were the grantee’s advisory services sufficient?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Does the displacee consider the grantee’s treatment and relocation assistance to be fair and reasonable? (interview)	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**SECTION 104(d) ANTIDISPLACEMENT COMPLIANCE**

Had the grantee demolished or converted any occupiable low to moderate income dwellings?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has DED determined that the grantee has a sufficient number of low to moderate income units to grant an exception to the one-for-one replacement requirements?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, does grantee have a specific one-for-one replacement plan approved by DED?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the displacee notified of relocation assistance available under 104(d), including Option to choose Uniform Act Relocation Assistance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

Which relocation assistance did the displacee choose?	<b>104(d)</b>	<b>Uniform Act</b>
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COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

**COMMERCIAL STRUCTURES & RESIDENTIAL-ONLY DEMOLITIONS**

**PROFESSIONAL SERVICES PROCUREMENT**

	<u>Demolition</u>		<u>Asbestos</u>		<u>Other</u>	
	<u>Inspector</u>		<u>Inspector</u>			
	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Did the grantee correctly prepare an RFP for demolition inspector and <b>licensed</b> asbestos inspector services?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Did the RFP identify the appropriate evaluation factors?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Was the RFP published in the newspaper of widest circulation?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Was the solicitation of the RFP adequate?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
If No, were an adequate number of MBE/WBE firms directly solicited?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Does the grantee have minutes of contract award?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
If not awarded to lowest bidder, are selection criteria available?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Were unsuccessful bidders notified in writing?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Did the grantee receive approval if less than three bids/proposals were received?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>

**DEMOLITION INSPECTOR CONTRACT**

Did the grantee contract for other professional services?			<b>Yes</b>	<b>No</b>
Who is the contract with? _____				
What is the executed date of the contract? _____				
Does this date precede the award date?			<b>Yes</b>	<b>No</b>
If Yes, is there a contingency clause?			<b>Yes</b>	<b>No</b>
Does the contract amount exceed the funding approval line item?			<b>Yes</b>	<b>No</b>
Contract amount: _____				
Is the contract lump sum?			<b>Yes</b>	<b>No</b>
Does the contract include all required language?				
Executive Order 11246 (only over \$10,000)			<b>Yes</b>	<b>No</b>
Title VI, Civil Rights Act of 1964			<b>Yes</b>	<b>No</b>
Section 109			<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)			<b>Yes</b>	<b>No</b>
Section 503			<b>Yes</b>	<b>No</b>
Affirmative action for Handicapped Workers			<b>Yes</b>	<b>No</b>
Section 504			<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975			<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)			<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)			<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)			<b>Yes</b>	<b>No</b>

COMMENTS: \_\_\_\_\_

**ASBESTOS INSPECTOR CONTRACT**

Did the grantee contract for other professional services?	<b>Yes</b>	<b>No</b>
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does this date precede the award date?	<b>Yes</b>	<b>No</b>
If Yes, is there a contingency clause?	<b>Yes</b>	<b>No</b>
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>
Does the contract include all required language?		
Executive Order 11246 (only over \$10,000)	<b>Yes</b>	<b>No</b>
Title VI, Civil Rights Act of 1964	<b>Yes</b>	<b>No</b>
Section 109	<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)	<b>Yes</b>	<b>No</b>
Section 503	<b>Yes</b>	<b>No</b>
Affirmative action for Handicapped Workers	<b>Yes</b>	<b>No</b>
Section 504	<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>
Anti-Lobbying (only over \$100,000)	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)	<b>Yes</b>	<b>No</b>

COMMENTS: \_\_\_\_\_

**DEMOLITION CONTRACTOR PROCUREMENT**

Did the grantee use competitive sealed bids? ( <i>contracts over \$25,000</i> )	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement require a bid bond, cashier's check, or other acceptable method for 5% of the bid?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement contain language relating to certifications, bonding, Section 3, and equal employment opportunity (EEO)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were descriptions of services on the invitation to bid clear?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were bids advertised in the newspaper of widest circulation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were bids advertised in a minority newspaper?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, were an adequate number of MBE/WBE/Section 3 firms directly solicited?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>If applicable</b> , was the Federal wage decision verified prior to opening bids?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a public meeting held to open bids and minutes in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were fewer than three bids received for any contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If Yes, did the grantee receive approval prior to awarding contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

Was the contract award to the lowest responsible bidder? Yes No N/A  
 If No, explain: \_\_\_\_\_

Does the grantee have minutes of contract award? Yes No N/A  
 Were unsuccessful bidders notified in writing? Yes No N/A

**DEMOLITION CONTRACTOR CONTRACT**

Did the grantee contract for this service? Yes No  
 Who is the contract with? \_\_\_\_\_  
 What is the award date of the contract? \_\_\_\_\_  
 Does the contract amount exceed the funding approval line item? Yes No  
 Contract amount: \_\_\_\_\_  
 Is the contract lump sum? Yes No

Were there any change orders? Yes No Yes No Yes No  
 Were the change orders approved by the grantee? Yes No Yes No Yes No

Specifically, does the construction contract include:

A copy of the bid bond, irrevocable letter of credit, or other acceptable instrument?	Yes	No	Yes	No	Yes	No
If an irrevocable letter of credit from a FDIC bank, was issued in place of a performance bond, does the irrevocable status and dates cover the life of the project?	Yes	No	Yes	No	Yes	No
Performance bond (only over \$25,000)	Yes	No	Yes	No	Yes	No
Payment bond (only over \$50,000)	Yes	No	Yes	No	Yes	No
Federal Labor Standards Provisions (if applicable)	Yes	No	Yes	No	Yes	No
Relevant Federal Prevailing wage determination (if applicable)	Yes	No	Yes	No	Yes	No
Anti-Lobbying Certification (only over \$100,000)	Yes	No	Yes	No	Yes	No
HUD Supplemental Conditions, containing at least:						
Executive Order 11246	Yes	No	Yes	No	Yes	No
Affirmative Action	Yes	No	Yes	No	Yes	No
Summary of Civil Rights, Laws, Executive Orders, and Regulations containing at least:						
Title VI, Civil Rights of 1964	Yes	No	Yes	No	Yes	No
Title VIII, Civil Rights of 1968	Yes	No	Yes	No	Yes	No
Section 109	Yes	No	Yes	No	Yes	No
Section 3 (only over \$100,000)	Yes	No	Yes	No	Yes	No
Section 503	Yes	No	Yes	No	Yes	No
Section 504	Yes	No	Yes	No	Yes	No
Age Discrimination Act of 1975	Yes	No	Yes	No	Yes	No
Executive Order 11063	Yes	No	Yes	No	Yes	No
Termination clause (only over \$10,000)	Yes	No	Yes	No	Yes	No
Affidavit (E-Verify)	Yes	No	Yes	No	Yes	No

**ASBESTOS ABATEMENT CONTRACTOR PROCUREMENT** (contracts over \$25,000)

Did the grantee use competitive sealed bids?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement require a bid bond, cashier's check, or other acceptable method for 5% of the bid? (require copy of license?)	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Did the advertisement contain language relating to certifications, bonding, Section 3, and equal employment opportunity (EEO)?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were descriptions of services on the invitation to bid clear?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were bids advertised in the newspaper of widest circulation?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were bids advertised in a minority newspaper?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, were an adequate number of MBE/WBE/Section 3 firms directly solicited?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>If applicable</b> , was the Federal wage decision verified prior to opening bids?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was a public meeting held to open bids and minutes in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were fewer than three bids received for any contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If Yes, did the grantee receive approval prior to awarding contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was the contract award to the lowest responsible bidder?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
If No, explain: _____			
Does the grantee have minutes of contract award?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Were unsuccessful bidders notified in writing?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

**ASBESTOS ABATEMENT CONTRACTOR**

Did the grantee contract for this service?	<b>Yes</b>	<b>No</b>
Who is the contract with? _____		
What is the executed date of the contract? _____		
Does the contract amount exceed the funding approval line item?	<b>Yes</b>	<b>No</b>
Contract amount: _____		
Is the contract lump sum?	<b>Yes</b>	<b>No</b>

Were there any change orders?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Were the change orders approved by the grantee?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>

Specifically, does the construction contract include:

A copy of the bid bond, irrevocable letter of credit, or other acceptable instrument?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
If an irrevocable letter of credit from a FDIC bank, was issued in place of a performance bond, does the irrevocable status and dates cover the life of the project?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>

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Performance bond (over \$25,000)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Payment bond (over \$50,000)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Contractor EEO certification	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
HUD Supplemental Conditions, containing at least:						
Executive Order 11246	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Affirmative Action	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Summary of Civil Rights, Laws, Executive Orders, and Regulations containing at least:						
Title VI, Civil Rights of 1964	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Title VIII, Civil Rights of 1968	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Section 109	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Section 3 (only over \$100,000)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Section 503	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Section 504	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Age Discrimination Act of 1975	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Executive Order 11063	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Federal Labor Standards Provisions (if applicable)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Anti-Lobbying Certification (over \$100,000)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Relevant Federal Prevailing wage determination	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Copy of Asbestos contractor license?	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Termination clause (only over \$10,000)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>
Affidavit (E-Verify)	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>No</b>

COMMENTS: \_\_\_\_\_

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Name of Owner	Proof of Ownership	Structure Vacant >12 Months	Signed Owner's Consent Form	Demolition Inspection Write-Up	Asbestos Inspection	DNR Asbestos Post Notification	Landfill Disposal Receipts	Certification of Completion
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
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**Economic Development**

GENERAL

Company(s) involved:

Name	Jobs to be created/retained	Existing employees
_____	_____	_____
_____	_____	_____

LMI company owners:

Name
_____
_____

Private investment release date: \_\_\_\_\_

Pledged private investment: \_\_\_\_\_

Amount of private investment documented: \_\_\_\_\_

Does this amount meet or exceed the pledged amount? Yes No N/A

Other contributions: \_\_\_\_\_

**ON-SITE REVIEW**

Number of pledged jobs created/retained: \_\_\_\_\_

If pledged job creation/retention goals have not been reached, explain why not and when this goal will be achieved: \_\_\_\_\_

Was payroll listing, including dates of hire, available and reviewed? Yes No N/A

Was payroll listing compared to Employment Status Statements? Yes No N/A

Is job documentation on file with the grantee? Yes No N/A

Breakdown of jobs and applicants:

Name	Present Employment	New/Retained Jobs	Number Low/Mod Income	Number Low Income	Number Very Low Income

	Jobs		Applicants	
	Total Direct Beneficiaries	Hispanic Direct Beneficiaries	Total Direct Beneficiaries	Hispanic Direct Beneficiaries
White:				
Black/African American:				
Asian:				
American Indian/Alaskan Native:				
Native Hawaiian/Other Pacific Islander:				
American Indian/Alaskan Native & White:				
Asian & White:				
Black/African American & White:				
Am. Indian/Alaskan Native & Black/African Am.:				
Asian & Native Hawaiian/Other Pacific Islander:				
All others:				
<b>TOTAL:</b>				
Female Head of Household:				
Handicapped (Disabled):				
Elderly:				

**Microenterprise**

GENERAL

Non LMI Company(s) involved:

Name	Jobs to be created/retained	Existing employees
_____	_____	_____
_____	_____	_____
_____	_____	_____

LMI company owners:

Name	Jobs to be created/retained	Existing employees
_____	_____	_____
_____	_____	_____
_____	_____	_____

Is there an environmental assessment and release of funds for each company? **Yes No N/A**

Pledged private investment: \_\_\_\_\_

Other contributions: \_\_\_\_\_

ON-SITE REVIEW

Is there a job created for every \$15,000 of loan funds? **Yes No N/A**

How many microenterprise loans were made? \_\_\_\_\_

Were loans made for eligible activities? **Yes No N/A**

Are there any income surveys available to prove the LMI status? **Yes No N/A**

How many loans were made to LMI owners? \_\_\_\_\_

Number of pledged jobs created/retained: \_\_\_\_\_

If pledged job creation/retention goals have not been reached, explain why not and when this goal will be achieved: \_\_\_\_\_

Was payroll listing, including dates of hire, available and received? **Yes No N/A**

Was payroll listing compared to Employment Status Statements? **Yes No N/A**

Is job documentation on file with grantee? **Yes No N/A**

Do jobs meet the full time permanent definition? **Yes No N/A**

Have individual loans exceeded \$25,000? **Yes No N/A**

If job retention has occurred, is there adequate "but for" documentation? **Yes No N/A**

Has the local microenterprise program delivery been consistent with the local program guidelines established? **Yes No N/A**

Is there evidence of a loan review board representing fair loan decisions? **Yes No N/A**

Is there an executed contract for every microenterprise loan made? **Yes No N/A**

Has a RLF been established and is there a tracking method for repayment? **Yes No N/A**

Has a file been established for each microenterprise applicant? **Yes No N/A**

Does each microenterprise file contain the required documents? (contract, income status statements, current payroll register, etc.) **Yes No N/A**

Has the original \$100,000 of loan funds been loaned to microenterprise? **Yes No N/A**

Of the loans without LMI owners, have 51% of the jobs created been provided to LMI persons (list below)

Name	Present Employment	New/Retained Jobs	Number Low/Mod Income	Number Low Income	Number Very Low Income

Company Names:	Total Direct Beneficiaries	Hispanic Direct Beneficiaries	Total Direct Beneficiaries	Hispanic Direct Beneficiaries
White:				
Black/African American:				
Asian:				
American Indian/Alaskan Native:				
Native Hawaiian/Other Pacific Islander:				
American Indian/Alaskan Native & White:				
Asian & White:				
Black/African American & White:				
Am. Indian/Alaskan Native & Black/African Am.:				
Asian & Native Hawaiian/Other Pacific Islander:				
All others:				
<b>TOTAL:</b>				
Female Head of Household:				
Handicapped (Disabled):				
Elderly:				

Is applicant documentation on file with the grantee? Yes No N/A

Breakdown of applicants:

Company Name:	Total Direct Beneficiaries	Hispanic Direct Beneficiaries
White:		
Black/African American:		
Asian:		
American Indian/Alaskan Native:		
Native Hawaiian/Other Pacific Islander:		
American Indian/Alaskan Native & White:		
Asian & White:		
Black/African American & White:		
Am. Indian/Alaskan Native & Black/African Am.:		
Asian & Native Hawaiian/Other Pacific Islander:		
All others:		
<b>TOTAL:</b>		
Female Head of Household:		
Handicapped (Disabled):		
Elderly:		

MICROENTERPRISE

Has the educational component described in application been successfully implemented and documented in the file? Yes No N/A

**Microenterprise  
(complete this form for each loan)**

Use of funds: \_\_\_\_\_

Loan made to: _____	Amount of loan	\$ _____
	Pledged private investment	\$ _____
	Other contributions	\$ _____

Total amount of project: \_\_\_\_\_ x 70%= \_\_\_\_\_

Does Microenterprise loan exceed 70% of the total project cost? **Yes No N/A**

Does loan exceed \$25,000? **Yes No N/A**

Non LMI Company? **Yes No**

LMI Company Owners? **Yes No**

Name	Jobs to be created/retained	Existing employees
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are income surveys available to prove the LMI Status? **Yes No N/A**

Was payroll listing, including dates of hire, available and reviewed? **Yes No N/A**

Is there a job created for every \$15,000 of loan funds? **Yes No N/A**

Was loan made for eligible activities? **Yes No N/A**

If pledged job creation/retention goals have not been reached, explain why not and when this goal will be achieved: \_\_\_\_\_  
\_\_\_\_\_

Was payroll listing compared to Employment Status Statements? **Yes No N/A**

Do jobs meet the full time permanent definition? (two permanent part time jobs are equal to one permanent full time job) **Yes No N/A**

Does the file contain the following:

Executed contract?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Proof of ownership? (land and building purchases)	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Environmental assessment?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
SHPO clearance?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has a RLF been established and is there a tracking method for repayment?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has a file been established for each microenterprise applicant?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Has the educational component been implemented and documented in the file?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was construction or rehab a part of the project?	<b>Yes</b>	<b>No</b>	<b>N/A</b>
Was prevailing wage paid correctly?	<b>Yes</b>	<b>No</b>	<b>N/A</b>

## DED CONFLICT OF INTEREST PROGRAM POLICY

The Community Development Block Grant Program, Department of Economic Development, State of Missouri, developed a conflict of interest policy in August 1983, relating to participation in contract selection, award, and administration. Since that time, this issue has arisen in other areas of the program. The State CDBG program is consistent with 2 CFR 200 of the Federal Regulations (conflict of interest) for the Community Development Block Grant Program.

### **Standard of Conduct Involving Conflict of Interest**

1. **Persons Covered:** The conflict of interest provisions of this policy shall apply to any person who is an employee, elected or appointed official, agent, consultant, officer, or any immediate family member\* or partner of the above, of the recipient, or of any designated public agencies, or sub-recipients which are receiving funds from the Missouri Community Development Block Grant program.  
  
    \* **Immediate family is defined as spouse, son, daughter, father, mother, grandparent, grandchild, stepchild, adopted child, foster child, and wards.**
2. **Applicability:**
  - a. In the area of procurement of supplies, equipment, construction, and services by recipients, sub-recipients, or designated public agencies, the conflict of interest provisions in 2 CFR 200 shall apply.
  - b. In all cases not governed by 2 CFR 200, the provisions of this policy shall apply. Such cases include the acquisition and disposition of real property and the provisions of assistance by the recipient or sub-recipients to individuals, businesses, and other private entities in the form of grants, loans, or other assistance through eligible activities of the program which authorize assistance.
3. **Conflicts Prohibited:** Except for approved eligible administrative or personnel cost, no persons described in 1 above who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under the State program or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter. For the State CDBG Economic Development Program, the above restrictions shall apply to all activities that are a part of the funding approval for all projects, and shall cover any such interest or benefit during, or at any time after, such person's tenure.
4. **Exception:** The State may, on a case by case basis, grant an exception to Section 3 above after a determination has been made by the State that the exception will serve the purposes of the Housing and Community Development Act of 1974 and the State's adopted Final Statement for each year therefor only after the recipient has provided to the State the following written documentation:
  - a. A disclosure of the nature of the conflict accompanied by documentation that there has been a public disclosure of the conflict and a description of how the public disclosure was made. Public disclosure may include either a public hearing or an appropriate comment period; public hearings require 5 full days of notice. Acceptable documentation would include a copy of the published notice for the public hearing, and minutes of the public hearing including comments; and
  - b. An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

### **Standard of Determining Exception**

In determining whether to grant an exception, after the above two items have been received, the State shall consider the following factors, where applicable:

1. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available
2. Whether an opportunity was provided for open competitive bidding or negotiation
3. Whether the person affected is a member of a group or class of low or moderate income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class
4. Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted activity in question
5. Whether the interest or benefit was present before the affected person was in a position as described in Section 3
6. Whether undue hardship will result either to the recipient or the person affected when weighted against the public interest served by avoiding the prohibited conflict
7. Any other relevant considerations

If after all considerations, determination is made to grant an exception, the State shall issue a waiver noting such exception and the conditions and basis of the issuance of same.

## **PROPERTY MANAGEMENT**

### **Introduction**

During the course of a CDBG project, recipients may purchase a variety of items necessary to successfully carry out implementation. Depending on its nature and value, there must be an accounting for property acquired with CDBG monies in accordance with the provisions of 24 CFR 85, as modified by 24 CFR 570, Subpart J.

There are two broad classifications of property that may be acquired with CDBG monies. These are as follows:

1. Real Property – land, including improvements, structures, and appurtenances
2. Personal Property – includes all property that is not considered real property such as equipment, desks, computers, lumber, tools, supplies, or intangible items. Intangible items include patents, inventions, and copyrights. Personal property is further classified as:
  - Non-expendable – all tangible property having a useful life of more than one year and an acquisition cost of \$3000 or more per unit, such as computers
  - Expendable personal property – all tangible property other than non-expendable items, such as office supplies and construction materials

Title to real property acquired in whole or in part with CDBG monies shall vest with the community as long as it is used for its authorized CDBG eligible purpose. Such real property must be used for the eligible activity approved by CDBG, and continue to meet the national objective, for no less than five (5) years after closeout of the project. If real property is no longer needed for authorized CDBG purposes, the CDBG recipient shall request disposition instructions from DED as follows:

The amount of compensation shall be computed by applying the percentage of DED/Federal participation in the cost of the original purchase to the current fair market value of the property. For example, if the DED participation was 50% in the program and the fair market value of the property at the time of disposition is \$20,000, DED shall be reimbursed \$10,000. The Department reserves the right to utilize the option of a straight-line depreciation schedule longer than 5 years to determine repayment, if deemed appropriate, with the grantee's consent.

This rule extends to real property purchased, constructed, or rehabilitated with CDBG funds for grant recipients and sub-recipients.

A CDBG recipient may use non-expendable personal property for community development activities as long as it is needed, even if DED is no longer needed for the original program. The property should be used in conjunction with other Federally-sponsored activities in the following order:

- Activities sponsored by HUD
- Activities sponsored by other Federal agencies

Disposition of non-expendable personal property should take the same form as the explanation of real property.

DED regulations require maintaining effective control over all property acquired in whole or in part with CDBG funds. In addition, recipients are required to assure that it is used solely for authorized purposes.

DED requires the maintenance of a property register as an integral part of effective control over and accountability for all CDBG acquired property. All categories of property may be recorded on this

single register, though separate registers should be kept for each project if the community administers more than one grant. When such property is purchased with CDBG funds, enter the applicable date on the register using the procedures described below. For example, in the case of real property, you may want to record the previous owner of a purchased parcel of land. Recipients may also wish to maintain a property management card for each item obtained.

All purchased property must be adequately controlled and safeguarded. For example, real property, such as buildings, should be adequately equipped with security devices. Non-expendable property, such as desks and computers, should be reasonably protected from theft. In addition, the receipt and issuance of expendable personal property must be controlled.

### **Procedures**

1. Identify all assets in real and non-expendable personal property for each CDBG grant.
2. Classify all assets according to the following classification scheme:
  - a. real property
    1. land acquired
    2. land improved
    3. buildings and facilities
    4. equipment – non-moveable
  - b. non-expendable personal property
    1. valuation \$1 – \$300
    2. valuation \$301 – 4,999
    3. valuation \$5,000 or more
3. Conduct a complete inventory of all property assets at two-year intervals or at project close-out.
4. Identify all non-expendable personal property by a tag permanently affixed to it which provides the following information:
  - a. CDBG grant and year
  - b. I.D. number
5. Maintain a property register for each CDBG grant. The register shall consist of a current and complete listing of all property acquisitions and dispositions. If, as part of the close-out process, the grantee is directed to compensate DED or the Federal government for its share of the property, then the method used to determine the fair market value should be noted.
6. In addition to the information contained on the register, a Property Management Card file for each item may be maintained to:
  - a. provide a continuous record of the current value of the property
  - b. maintain coding classification references, location, and use information
  - c. provide a subsidiary file tied to the property register
7. For expendable personal property, such as that used in housing rehabilitation projects (lumber and electrical fixtures), there must be:
  - a. adequate records of the receipt of goods, issuance of goods, and balance of items on hand

- b. documentation of the person who authorized the issuance of goods
- c. documentation of the location, such as a house or project, to which the goods were delivered
- d. documentation of the individual who received the goods

Other expendable personal property, such as office supplies, does not need this level of control. However, items must be adequately safeguarded.

**\*\*PROGRAM ADMINISTRATION HELPFUL HINTS\*\***

- ❖ Lack of attention to compliance slows project progress.
- ❖ Poor paperwork organization spells trouble.
- ❖ Assigning one point of contact with the city or county eases communication and lessens misunderstanding.
- ❖ Remember that the responsibility of the grant rests with the city or county.
- ❖ Keep a set of records at the city hall or county courthouse.
- ❖ Monitor yourself before the state monitors you.
- ❖ Conflict of interest cannot be fixed after it occurs. Recognize it and take action ahead of time.
- ❖ Real property purchased with CDBG funds is subject to repayment if it changes hands.

**(More helpful hints can be found at the end of Chapters II through XI.)**