

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
- 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:

Recordkeeping (saving documents, filing, keeping receipts, etc.)

Financial Management (tracking all of the project dollars)

Citizen Participation (including your citizens in the project)

Procurement (how to purchase materials and select contractor)

Contract and Property Management (who to contract with and what the document should say)

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



CITIZEN PARTICIPATION

- Affidavit of publication or certified posting 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



FINANCIAL MANAGEMENT

- Funding Approval/Grant Agreement
- Checkbook
- Activity ledger
- Bank statements and evidence of reconciliation
- All canceled checks
- 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 and the list was directly solicited for project activities.
-  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
-  Selected administrator's license/debar check clearance letter from CDBG
-  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
-  Selected engineer/architect's license/debar check clearance letter from CDBG
-  Executed engineering contract as well as all proposals received



Construction Contract

-  Selected contractor's and surety company's, if applicable, license/debar check clearance letter from CDBG
-  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
-  Selected vendor's license/debar check clearance letter from CDBG
-  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

 Payroll Authorization Letter, if applicable

 Documentation of fringes per hour for each classification, if applicable

 Documentation of “other deductions” accompanied with an employee and employer agreement for said deductions, if applicable

 Apprentice documentation, if applicable

 Documentation of Payroll Review Sheet for corresponding Payrolls

 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)



ECONOMIC DEVELOPMENT

-  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
-  Documentation of repayment of program income, if applicable



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)

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 random survey, is CDBG's approval included? **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**

Are 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: _____

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Project/Grant Administration
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

CASH	Does the grantee record all cash transactions in a consistent, centralized system?	Yes	No	
	Does the grantee use activity ledgers to track expenditures by activity?	Yes	No	
	Are RFFs based on either work completed and invoiced or projected cash needs?	Yes	No	
BANK STATEMENT RECONCILIATION	Are fund/activity balances reconciled to bank statements monthly?	Yes	No	
	Is the bank statement reconciliation documented?	Yes	No	
	Is the person reconciling monthly bank statements prohibited from signing checks?	Yes	No	
	Are two signatures required on all checks?	Yes	No	
	If No, is the person writing checks prohibited from signing them?	Yes	No	
	Is the person authorized to sign checks different from the person who signs RFFs?	Yes	No	
	Check a sample of canceled checks. Are all dates, payee, amounts, endorsements, and signatures proper?	Yes	No	
	Did the grantee spend all cash in excess of \$1000 within the 3 days allowed?	Yes	No	
	Is the CDBG bank account non-interest bearing?	Yes	No	
	If No, was the interest returned to DED?	Yes	No	
MATCHING FUNDS	If the grantee was required to use matching funds, is there a record of all matching Funds used, including supporting documentation?	Yes	No	
	Documentation:			
	Funding Approval	Amount		
	Cash match _____	_____		
	In-kind match _____	_____		
	Other _____	_____		
	Private match _____	_____		
AUDIT TRAIL	Did the grantee expend the amount of matching funds pledged in the application (FA)?	Yes	No	
	Is there any evidence of CDBG funds used to reimburse local funds for non-exempt activities expended prior to the environmental release of CDBG funds?	Yes	No	
	Is there any evidence of CDBG funds used to reimburse local funds expended prior to the grant award date?	Yes	No	
	If Downtown Revitalization, is there a dollar-for-dollar match of eligible private investment funds?	Yes	No	
	Are all accounting transactions supported by invoice?	Yes	No	
	Are invoices properly referenced with check numbers, dates, RFF numbers, funding sources, and amounts paid?	Yes	No	
	Are all expenses allowable per grant agreement?	Yes	No	
PROGRAM INCOME	For in-kind or local labor, are payrolls supported by time sheets?	Yes	No	
	Have all Single Audits required from 12 months prior been submitted to and verified by the Federal Audit Clearinghouse?	Yes	No	
	If earned, was program income disclosed in financial records?	Yes	No	N/A
	Was program income used for eligible activities?	Yes	No	N/A
	Was the eligible expenditure of program income approved by DED prior to use?	Yes	No	N/A
Are all reports on program income current with DED requirements?	Yes	No	N/A	

Environmental

Is there an Environmental Review Record (ERR) containing all original documents available for public review at the grantee’s address?	Yes	No	
Does the ERR contain the originally-signed ‘Determination of Level of Environmental Review’ form?	Yes	No	
Does the ERR contain the originally-signed ‘Finding of Exemption’ form?	Yes	No	
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?	Yes	No	N/A
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?	Yes	No	N/A
Did the project convert to Exempt?	Yes	No	N/A
If No, does the ERR contain the ‘Notice of Intent to Request Release of Funds’ public notice?	Yes	No	N/A
Does the ERR contain the affidavit of publication and/or tear sheet?	Yes	No	N/A
If the project required an Environmental Assessment (EA), does the ERR contain the originally-signed EA and all supporting documentation?	Yes	No	N/A
Does the ERR contain the ‘Combined Notice’ (Notice of Intent to Request Release of Funds and Finding of No Significant Impact)?	Yes	No	N/A
Does the ERR contain the affidavit of publication and/or tear sheet?	Yes	No	N/A
Does the ERR contain proof of distribution to environmental agencies and Tribes, if applicable? (certified mail receipts and/or cover letters & stamped envelopes)	Yes	No	N/A
Did the project require completion of HUD’s 8-Step Decision Making Process for Floodplains and/or Wetland?	Yes	No	N/A
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		Yes	No
Written comments from the public and RE written responses	Yes	No	N/A
<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		Yes	No
Written comments from the public and RE written responses	Yes	No	N/A
Does the ERR contain the originally-signed Request for Release of Funds and Certification Form HUD-7015.16 (RROF/C)?	Yes	No	N/A
Does the ERR contain one of the following originally-signed release of funds formats?	Yes	No	N/A

Pre-Grant Award Environmental Approval Letter	Yes	No
If Yes, Date: _____		
Authority to Use Grant Funds form	Yes	No
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? **Yes** **No** **N/A**

Were conditions for approval and/or mitigation measures required as a condition of DED's release of funds? **Yes** **No** **N/A**

 If Yes, does the documentation exist as evidence that each condition was successfully implemented and/or approved by authorizing agencies and/or Tribes? **Yes** **No**

 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? **Yes** **No** **N/A**

Did the project require a tiered review approach? **Yes** **No**

 If Yes, does the ERR contain all Tier II Reviews and DED approval of each review? **Yes** **No**

Does this monitoring indicate any need for follow-up monitoring or technical assistance by DED's Environmental Officer? **Yes** **No**

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? **Yes** **No**

 If No, explain: _____

COMMENTS: _____

CDBG Administrative Manual
Project/Grant Administration
Equal Opportunity/Fair Housing

CDBG Employment by Grantee:

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 for with the grantee's CDBG funds? **Yes No N/A**

Limited English Proficiency Compliance: If required, were translator services available? **Yes No N/A**
If ethnic population in project service area was 5% or greater, was information in the ethnic group's language published and provided to those project beneficiaries? **Yes No N/A**

Annual Official Actions to Affirmatively Further FAIR HOUSING:

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

- 1) _____
- 2) _____
- 3) _____

Annual Official Actions to Address Impediments to Fair Housing Choice:

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 identified Impediments to Fair Housing Choice.

The grantee must conduct one action each year (12 month period) of the project, beginning with the grant award date.

- 1) _____
- 2) _____
- 3) _____

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

MBE/WBE/DBE-Section 3 Procurement Direct Solicitation Lists:

Was above list provided for all procurement activities? **Yes No N/A**

Were MBE/WBE/DBE-Section 3 firms solicited for construction activities? **Yes No N/A**

Were MBE/WBE/DBE-Section 3 firms solicited for the following professional service activities?

Engineering Firms	Yes	No	N/A
Architectural Firms	Yes	No	N/A
Grant Administration	Yes	No	N/A
Appraisers	Yes	No	N/A
Review Appraisers	Yes	No	N/A
Titles Services	Yes	No	N/A
Other Professional Services	Yes	No	N/A

Section 504 CDBG Program Accessibility/Disability Compliance:

1. Has grantee completed Part I of Section 504 /ADA Accessibility Disability Self-Evaluation form? **Yes No N/A**
2. Has grantee completed Part II of Section 504 Self-Evaluation for where grantee has at least 15 or more employees? **Yes No N/A**
3. If 15 or more employees, does grantee have a disability grievance procedure? **Yes No N/A**
4. If applicable, did grantee complete Section 504 Transition Plan? **Yes No N/A**

LGBTQ Equal Access Rule to HUD Funded Programs:

Where any complaints received from LGBTQ persons who applied for or were served by the grantee's CDBG funded project? **Yes No N/A**

If complaints were received, how were the complaints resolved?

CSAR Report: Is grantee current with (each Federal fiscal year October 1-Sept.30 since grant was awarded)

Submissions of annual Contractor and Subcontractor Activity Report (CSAR)? **Yes No**

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

COMPLAINTS:

Have any *written* equal opportunity/civil rights complaints been received? **Yes No N/A**

Were the complaints handled appropriately? **Yes No N/A**

Should the Missouri Human Rights Commission or HUD be contacted? **Yes No N/A**

COMMENTS: _____

Procurement

GENERAL REQUIREMENTS

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

PROFESSIONAL SERVICES

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

CONSTRUCTION

Did the grantee use competitive sealed bids (contracts over \$25,000)?	Yes	No	N/A
Did the advertisement require a bid bond, cashier's check, or other acceptable method for 5% of the bid?	Yes	No	N/A
Did the advertisement contain language relating to labor provisions, state & Federal prevailing wage certifications, bonding, Section 3, and equal employment opportunity (EEO)?	Yes	No	N/A
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?	Yes	No	N/A
Were bids advertised in the newspaper of widest circulation?	Yes	No	N/A
Were an adequate number of MBE/WBE/Section 3 firms directly solicited?	Yes	No	N/A
Was the Federal wage decision verified prior to opening bids?	Yes	No	N/A
Was a public meeting held to open bids and minutes in the file?	Yes	No	N/A
Were fewer than three bids received for any contract?	Yes	No	N/A
If Yes, did the grantee receive approval prior to awarding contract?	Yes	No	N/A
Was the contract awarded to the lowest responsible bidder?	Yes	No	N/A
If No, explain: _____			
<hr/>			
Does the grantee have minutes of contract award?	Yes	No	N/A
Were unsuccessful bidders notified in writing?	Yes	No	N/A
<u>SMALL PURCHASES (less than \$25,000)</u>			
Is there documentation of vendors, price quotations, and dates? (telephone bids, faxed Bids, emails)?	Yes	No	N/A
Did the list of vendors include:			
MBE/WBE firms?	Yes	No	N/A
Section 3 firms?	Yes	No	N/A
Was selection purchased fairly?	Yes	No	N/A
Was a purchase order/contract issued to the most advantageous vender?	Yes	No	N/A
<u>NONCOMPETITIVE PROPOSALS (Must be pre-approved by DED)</u>			
Was the desired item available from only one source?	Yes	No	N/A
If No, were costs eligible?	Yes	No	N/A
Did the grantee receive authorization for noncompetitive negotiation?	Yes	No	N/A
Was competition determined to be inadequate after soliciting all known sources?	Yes	No	N/A
Were the goods or services needed immediately to meet a public emergency?	Yes	No	N/A
COMMENTS: _____			

Contract Management (Administration)

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

Contract Management (Engineering/Architectural)

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

Contract Management (Other Professional Services)

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

COMMENTS: _____

Contract Management (Construction)

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

COMMENTS: _____

Labor Standards

GENERAL

Are Federal and State wage decisions correct as shown in the contract(s)?_____	Yes	No	N/A
Are all contractors and subcontractors licensed to do business in Missouri, registered 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?_____	Yes	No	N/A
Is the contractor Surety verification clearance letter in the file?_____	Yes	No	N/A
Is the CDBG Start of Construction Notice on file?_____	Yes	No	N/A
Is the Pre-Construction Conference Report on file?_____	Yes	No	N/A
Is there documentation of 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?_____	Yes	No	N/A

PAYROLL REVIEW

Was the first payroll and payroll review sheet submitted to DED for each contractor and subcontractor?_____	Yes	No	N/A
Recommended but can be required at the field rep’s discretion, payroll review sheets sent in for corresponding RFFs? _____	Yes	No	N/A
Were all original payrolls documented as submitted weekly to the grantee?_____	Yes	No	N/A
Are statements of compliance signed by owner or officer of the company?_____	Yes	No	N/A
If no, was a Payroll Authorization Letter on file? _____	Yes	No	N/A
Was a statement of compliance submitted with each payroll?_____	Yes	No	N/A
Is the employer IRS identification number on record?_____	Yes	No	N/A
Do the payrolls contain the following for each employee:			
<i>Name and specific four-digit identifying number?</i> _____	Yes	No	N/A
<i>Work classification?</i> _____	Yes	No	N/A
<i>Hourly rates of wages paid?</i> _____	Yes	No	N/A
<i>Daily number of hours worked (including any overtime)?</i> _____	Yes	No	N/A
<i>Weekly number of hours worked (including any overtime)?</i> _____	Yes	No	N/A
<i>Explanation of other deductions (when applicable)?</i> _____	Yes	No	N/A
<i>Is there documentation of employee and employer agreement on file?</i> _____	Yes	No	N/A
<i>Gross and net wages paid?</i> _____	Yes	No	N/A
Do wages shown on payrolls equal or exceed the rates in the wage decisions?_____	Yes	No	N/A
If split work classifications were used, are separate daily time records shown?_____	Yes	No	N/A
If fringe benefits were paid into approved plans/funds/programs, has the hourly equivalent amount been documented? _____	Yes	No	N/A
Were additional classifications (if necessary) obtained from USDOL?_____	Yes	No	N/A
Has the grantee documented review and approval of payrolls?_____	Yes	No	N/A
Has overtime been correctly paid?_____	Yes	No	N/A

EMPLOYEE INTERVIEWS

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

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

Certified Payroll Review Checklist

Community Development Block Grant Program

Prime/Subcontractor Reviewed:	
Project Number:	Payroll Number Reviewed:
Federal Wage Order:	State Wage rate:
Instructions: This signed checklist is to be submitted with corresponding "Request for Funds Form" (RFF) before RFF's can be processed and approved.	

Payroll Information Checklist

- | YES | N/A | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Contractor's name and address with the prime or subcontractor(s) identified. |
| <input type="checkbox"/> | <input type="checkbox"/> | Payroll number, week ending, and project location. |
| <input type="checkbox"/> | <input type="checkbox"/> | Employee full name and four-digit identification number. |
| <input type="checkbox"/> | <input type="checkbox"/> | Employee's full work classification, including group or class |
| <input type="checkbox"/> | <input type="checkbox"/> | Identification of apprentices and program levels (%) on payrolls |
| <input type="checkbox"/> | <input type="checkbox"/> | Daily and weekly employee hours worked in each applicable work classification |
| <input type="checkbox"/> | <input type="checkbox"/> | Daily and weekly employee overtime hours worked in each applicable work classification |
| <input type="checkbox"/> | <input type="checkbox"/> | Base rate shown for each employee classification, overtime rate shown when worked per classification. |
| <input type="checkbox"/> | <input type="checkbox"/> | Week's Gross amount earned. |
| <input type="checkbox"/> | <input type="checkbox"/> | Weeks itemized deductions with explanation of itemized deductions if needed. |
| <input type="checkbox"/> | <input type="checkbox"/> | Week's Net wages paid. |
| <input type="checkbox"/> | <input type="checkbox"/> | Compliance statement attached. |
| <input type="checkbox"/> | <input type="checkbox"/> | Method of fringe benefit payment described by checking either box (4)(a) or (4)(b) Exceptions explanation for fringe benefit (4)(c) |
| <input type="checkbox"/> | <input type="checkbox"/> | Fringe benefit package information in file and updated as needed Identification |
| <input type="checkbox"/> | <input type="checkbox"/> | of OJTs, apprentices and program levels (%) on payrolls Statement of compliance |
| <input type="checkbox"/> | <input type="checkbox"/> | has original signature of owner or authorized person. |

Compliance Review Checklist

- | Yes | N/A | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Verify work classifications reported are consistent with the work performed |
| <input type="checkbox"/> | <input type="checkbox"/> | Verify correct wage rates are being paid (Federal vs. State requirements) |
| <input type="checkbox"/> | <input type="checkbox"/> | Verify overtime is being paid correctly (Federal vs. State requirements) |
| <input type="checkbox"/> | <input type="checkbox"/> | Verify that Apprentice Program documentation is in project files |
| <input type="checkbox"/> | <input type="checkbox"/> | Compare payrolls with wage rate interviews |

Reviewed By:	Date:
--------------	-------

I hereby attest that the above referenced payroll review has been performed in accordance with the current CDBG Administrative Manual guidelines. When applicable, all discrepancies have been brought to the attention of the Prime Contractor and a corresponding CDBG "Employee Restitution Checklist" has been attached.

Certified Payroll Review Sheet

Project:

State Wage Order:

Company Name:

Federal Wage Order:

Straight Line Compliance

Pay No.	Name	Craft or Classification	Rate Paid			State Rate			Federal Rate			App
			Basic	Fringe	Total	Basic	Fringe	Total	Basic	Fringe	Total	

Overtime Compliance

Notes:

Reviewers Name: _____ Signature: _____

CDBG EMPLOYEE RESTITUTION CHECKLIST

CDBG Project # _____

Grantee Name _____

Applicable State Wage Rates # _____

Applicable Federal Wage Rates # _____

Name of Contractor _____

Date of Payroll with wage error _____

Reason for Error:

- Wrong hourly amount
- Wrong classification
- Wrong wage rate
 - Used amount from federal, should have been state
 - Used amount from state, should have been federal
 - Used wrong wage publication

Name of Employee	Job Classification	Wage Amount Paid	Correct Wage Amount	Amount of Difference	# hours worked in period	Amount Due	Amount of Restitution

Date of Notification to Contractor _____

Date of Restitution Made _____

ATTACH THE FOLLOWING DOCUMENTS TO THIS COMPLETED FORM:

- Copy of Certified Payroll in error
- Copy of corrected Certified Payroll
- Copy of the notification to contractor
- Copy of correct wage rates, if applicable

Acquisition

What type of acquisition was required?

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

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*****

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*****		

*Title or Deed

**Hand delivered or certified mail

***If appraisal is not waived and property value above \$10,001

****Recent sales data, court awards, etc.-if value of property valued at \$10,000 or less

*****Copy of the check to owner, if not donated

*****Deed, permanent easement, temporary easement if applicable, long term lease, or right-of-way

Were all incidental costs related to the acquisition and transfer of title from the property owner paid by the grantee (e.g., recording fees, boundary surveys, legal descriptions, mortgage penalties, transfer fees, pro-rated share of prepaid taxes, litigation expense, etc.)? **Yes** **No**

Was any grant funds used to clear the title? (no grant funds may be used to perfect a title) **Yes** **No**

If condemnation was required, does the judgment equal the amount paid? **Yes** **No**

COMMENTS: _____

COMMERCIAL STRUCTURES & RESIDENTIAL-ONLY DEMOLITIONS

PROFESSIONAL SERVICES PROCUREMENT

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

DEMOLITION INSPECTOR CONTRACT

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

COMMENTS: _____

ASBESTOS INSPECTOR CONTRACT

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

COMMENTS: _____

DEMOLITION CONTRACTOR PROCUREMENT

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

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

ASBESTOS ABATEMENT CONTRACTOR

Did the grantee contract for this service?		Yes	No
Who is the contract with? _____			
What is the executed date of the contract? _____			
Does the contract amount exceed the funding approval line item? Contract amount: _____		Yes	No
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
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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 (over \$25,000)	Yes	No	Yes	No	Yes	No
Payment bond (over \$50,000)	Yes	No	Yes	No	Yes	No
Contractor EEO certification	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
Federal Labor Standards Provisions (if applicable)	Yes	No	Yes	No	Yes	No
Anti-Lobbying Certification (over \$100,000)	Yes	No	Yes	No	Yes	No
Relevant Federal Prevailing wage determination	Yes	No	Yes	No	Yes	No
Copy of Asbestos contractor license?	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

COMMENTS: _____

CDBG Administrative Manual
Project/Grant Administration

Name of Owner	Proof of Ownership & Clear Title	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								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								

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:				
TOTAL:				
Female Head of Household:				
Handicapped (Disabled):				
Elderly:				

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 DISPLACEE 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?	Yes	No	N/A
Was a referral to at least one comparable replacement dwelling included in the notice of eligibility for relocation assistance?	Yes	No	N/A
Is there evidence that the grantee inspected the replacement dwelling to determine that it met the decent, safe, and sanitary standards?	Yes	No	N/A

LAST RESORT UNIT DOCUMENTATION

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

INTERVIEW OF PROJECT DISPLACED

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

SECTION 104(d) ANTIDISPLACEMENT COMPLIANCE

Had the grantee demolished or converted any occupiable low to moderate income dwellings?	Yes	No	N/A
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? If No, does grantee have a specific one-for-one replacement plan approved by DED?	Yes	No	N/A
Was the displacee notified of relocation assistance available under 104(d), including Option to choose Uniform Act Relocation Assistance?	Yes	No	N/A
Which relocation assistance did the displacee choose?	104(d)	Uniform Act	

COMMENTS: _____

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:

real property

1. land acquired
2. land improved
3. buildings and facilities
4. equipment – non-moveable

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:

1) CDBG grant and year

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:

1) provide a continuous record of the current value of the property

maintain coding classification references, location, and use information

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:

1) adequate records of the receipt of goods, issuance of goods, and balance of items on hand

documentation of the person who authorized the issuance of goods

documentation of the location, such as a house or project, to which the goods were delivered

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 program requirements slows project progress.
- ❖ Paperwork organization is extremely important.
- ❖ 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 (monitoring checklists are in the manual.)
- ❖ Real property purchased with CDBG funds is subject to repayment if it changes hands.
- ❖ Notify the appropriate Field Rep/CDBG staff if there are any address, telephone number, or e-mail changes for grant administrators, Regional Planning Commissions, project engineers/architects, cities, counties, etc.
- ❖ **Notify the appropriate Field Rep/CDBG staff of any key personnel changes. This would include grant administrators, RPC Executive Directors, engineers/architects, city officials (mayors and presiding commissioners), etc.**