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.

ţi NATIONAL OBJECTIVE

ɨ All income surveys and tabulation sheet, if applicable
ɨ Documentation of 51% LMI from census information, if applicable
ɨ Documentation of alleviating slums and blight, if applicable
ɨ Documentation of meeting an urgent health and safety need, if applicable

ţi CITIZEN PARTICIPATION

ɨ Affidavit of publication or certified posting for the public hearing held to review grant performance
ɨ Minutes of performance review public hearing
ɨ All criticisms, complaints, and grantees’ responses to these criticisms and complaints
ɨ Documentation of actions taken to involve all citizens in implementing the project

ţi FINANCIAL MANAGEMENT

ɨ Funding Approval/Grant Agreement
ɨ Checkbook
ɨ Activity ledger
ɨ Bank statements and evidence of reconciliation
ɨ All canceled checks
ɨ Copies of all RFFs and supporting invoices reference with check numbers, dates, and amounts paid
ɨ Cash match documentation including invoices, canceled checks, ledgers, etc. (If downtown revitalization, cash match must be one-for-one match with private investment.)
ɨ In-kind match documentation including employees, pay per hour, and number of hours worked on project (time sheets)
ɨ All contract amendments and supporting documentation
ɨ 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 grantees’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
PROCUREMENT AND CONTRACT MANAGEMENT

- Documentation that Fair Housing impediments have been identified
- All equal opportunity/civil rights complaints and grantee’s response to these complaints
- 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)
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.
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:  _______________________________________________________________________________
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

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: __________________________________________________________

I-18
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: _______________________________________________________________________________
__________________________________________________________________________________________

I-19
**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 $1,000 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**

<table>
<thead>
<tr>
<th>Documentation:</th>
<th>Funding Approval</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash match</td>
<td></td>
<td></td>
</tr>
<tr>
<td>In-kind match</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Private match</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- 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**

**AUDIT TRAIL**
- 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**
- 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**

**PROGRAM INCOME**
- 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 not Subject to 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 Subject to 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:  

**Early Public Notice:**
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

**Notice of Explanation:**
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
  If Yes, Date: ______________________

Authority to Use Grant Funds form
  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 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]

Equal Opportunity/Fair Housing:

- 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]

I-23
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: ________________________________________________________________
**GENERAL REQUIREMENTS**

<table>
<thead>
<tr>
<th>Does the grantee have a written procurement policy?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date adopted: _________________________________</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Does the grantee have a written conflict of interest policy?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date adopted: _________________________________</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Whose procurement policy was used in this project?</th>
<th>____________________________________________</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Was it implemented correctly?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**PROFESSIONAL SERVICES**

<table>
<thead>
<tr>
<th>Did the grantee correctly prepare an RFP for administrators/professional service providers and RFQ for engineers/architects?</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Did the RFP/RFQ identify the appropriate evaluation factors?</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Was the RFP/RFQ published in the newspaper of widest circulation in the county?</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Was the solicitation of the RFP/RFQ adequate? (all firms on the CDBG administrator list contacted?)</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Was the RFP/RFQ published in a minority newspaper? (If No, were an adequate number of MBE/WBE firms directly solicited?)</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Does the grantee have minutes of contract award? (If not award to the lowest bidder, are selection criteria available?)</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Were unsuccessful bidders notified in writing?</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Did the grantee receive approval if less than three bids/proposals were received?</th>
<th>Administration</th>
<th>Engineering</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

**CONSTRUCTION**

<table>
<thead>
<tr>
<th>Did the grantee use competitive sealed bids (contracts over $25,000)?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Did the advertisement require a bid bond, cashier’s check, or other acceptable method for 5% of the bid?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Did the advertisement contain language relating to labor provisions, state &amp; Federal prevailing wage certifications, bonding, Section 3, and equal employment opportunity (EEO)?</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Were descriptions of items/services on the invitation to bid clear and without reference</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>
to specific brand requirements unless the brand was used as an example of functional
or quality requirements?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Were bids advertised in the newspaper of widest circulation?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Were an adequate number of MBE/WBE/Section 3 firms directly solicited?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was the Federal wage decision verified prior to opening bids?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was a public meeting held to open bids and minutes in the file?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Were fewer than three bids received for any contract?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

If Yes, did the grantee receive approval prior to awarding contract?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was the contract awarded to the lowest responsible bidder?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

If No, explain:  
__________________________________________________________________________________
__________________________________________________________________________________

Does the grantee have minutes of contract award?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Were unsuccessful bidders notified in writing?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**SMALL PURCHASES (less than $25,000)**  
Is there documentation of vendors, price quotations, and dates? (telephone bids, faxed
Bids, emails)?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Did the list of vendors include:  

MBE/WBE firms?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Section 3 firms?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was selection purchased fairly?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was a purchase order/contract issued to the most advantageous vender?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**NONCOMPETITIVE PROPOSALS (Must be pre-approved by DED)**  
Was the desired item available from only one source?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

If No, were costs eligible?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Did the grantee receive authorization for noncompetitive negotiation?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Was competition determined to be inadequate after soliciting all known sources?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

Were the goods or services needed immediately to meet a public emergency?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

COMMENTS:  
__________________________________________________________________________________

I-26
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: ______________________________________________________________________
__________________________________________________________________________________
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 (CDBG or equivalent) 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 (If applicable) Yes No
- Section 3 Contractor Tables (A, B, C, D) (If applicable) Yes No
- Have Tables C & D been updated? (If applicable) Yes No
- Certificate of Contemplated MBE, WBE & Section 3 Business (If applicable) 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: _______________________________________________________________________________
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:

Name and specific four-digit identifying number? Yes No N/A

Work classification? Yes No N/A

Hourly rates of wages paid? Yes No N/A

Daily number of hours worked (including any overtime)? Yes No N/A

Weekly number of hours worked (including any overtime)? Yes No N/A

Explanation of other deductions (when applicable)? Yes No N/A

Is there documentation of employee and employer agreement on file? Yes No N/A

Gross and net wages paid? 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
CDBG Administrative Manual
Project/Grant Administration

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

<table>
<thead>
<tr>
<th>YES</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Compliance Review Checklist

<table>
<thead>
<tr>
<th>Yes</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Pay No.</th>
<th>Name</th>
<th>Craft or Classification</th>
<th>Rate Paid</th>
<th>State Rate</th>
<th>Federal Rate</th>
<th>App</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Basic</td>
<td>Fringe</td>
<td>Total</td>
<td>Basic</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Basic</td>
<td>Fringe</td>
<td>Total</td>
<td>Basic</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Basic</td>
<td>Fringe</td>
<td>Total</td>
<td>Basic</td>
</tr>
</tbody>
</table>

### Overtime Compliance

<table>
<thead>
<tr>
<th>Pay No.</th>
<th>Name</th>
<th>Overtime Rate</th>
<th>Overtime Hours</th>
<th>Overtime Pay</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**

**Reviewers Name:** ___________________________

**Signature:** ___________________________

---

I-32
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

<table>
<thead>
<tr>
<th>Name of Employee</th>
<th>Job Classification</th>
<th>Wage Amount Paid</th>
<th>Correct Wage Amount</th>
<th>Amount of Difference</th>
<th># hours worked in period</th>
<th>Amount Due</th>
<th>Amount of Restitution</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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
What type of acquisition was required?

Full Title  
Permanent Easement  
Long Term Lease  
Right of Way  
Temporary Easement (if checked, not subject to Uniform Act)  
Acquired from another public entity (if checked, not subject to Uniform Act)

Is there a separate file for each necessary acquisition?

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******
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: ____________________________________________

I-35
### COMMERCIAL STRUCTURES & RESIDENTIAL-ONLY DEMOLITIONS

#### PROFESSIONAL SERVICES PROCUREMENT

| 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? | Yes | No | Yes | No | Yes | No |
| 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?  

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11246 (only over $10,000)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Title VI, Civil Rights Act of 1964</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 109</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 3 (only over $100,000)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 503</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affirmative action for Handicapped Workers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Section 504</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Age Discrimination Act of 1975</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Anti-Lobbying (only over $100,000)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Affidavit (E-Verify)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Termination clause (only over $10,000)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**COMMENTS:**  
_________________________________________________________________________

## DEMOLITION CONTRACTOR PROCUREMENT

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 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 \(\text{N/A}\)

If No, explain:

______________________________________________________________________

______________________________________________________________________

Does the grantee have minutes of contract award?

Yes No \(\text{N/A}\)

Were unsuccessful bidders notified in writing?

Yes No \(\text{N/A}\)

**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

Were the change orders approved by the grantee?

Yes No

Specifically, does the construction contract include:

A copy of the bid bond, irrevocable letter of credit, or other acceptable instrument?

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

Performance bond (only over $25,000)

Yes No

Payment bond (only over $50,000)

Yes No

Federal Labor Standards Provisions (if applicable)

Yes No

Relevant Federal Prevailing wage determination

Yes No

Federal Labor Standards Provisions (if applicable)

Yes No

Anti-Lobbying Certification (only over $100,000)

Yes No

HUD Supplemental Conditions, containing at least:

Executive Order 11246

Yes No

Affirmative Action

Yes No

Summary of Civil Rights, Laws, Executive Orders, and Regulations containing at least:

Title VI, Civil Rights of 1964

Yes No

Title VIII, Civil Rights of 1968

Yes No

Section 109

Yes No

Section 3 (only over $100,000)

Yes No

Section 503

Yes No

Section 504

Yes No

Age Discrimination Act of 1975

Yes No

Executive Order 11063

Yes No

Termination clause (only over $10,000)

Yes No

Affidavit (E-Verify)

Yes No
### ASBESTOS ABATEMENT CONTRACTOR PROCUREMENT (contracts over $25,000)

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

### ASBESTOS ABATEMENT CONTRACTOR

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did the grantee contract for this service?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Who is the contract with?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>What is the executed date of the contract?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Does the contract amount exceed the funding approval line item?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contract amount:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the contract lump sum?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Were there any change orders?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Were the change orders approved by the grantee?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specifically, does the construction contract include:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A copy of the bid bond, irrevocable letter of credit, or other acceptable instrument?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>If an irrevocable letter of credit from a FDIC bank, was issued in place of a performance bond, does the irrevocable...</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requirement</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
</tr>
<tr>
<td>status and dates cover the life of the project?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Performance bond (over $25,000)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Payment bond (over $50,000)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Contractor EEO certification</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>HUD Supplemental Conditions, containing at least:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Order 11246</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Affirmative Action</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Summary of Civil Rights, Laws, Executive Orders, and Regulations containing at least:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Title VI, Civil Rights of 1964</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Title VIII, Civil Rights of 1968</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Section 109</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Section 3 (only over $100,000)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Section 503</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Section 504</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Age Discrimination Act of 1975</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Executive Order 11063</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Federal Labor Standards Provisions (if applicable)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Anti-Lobbying Certification (over $100,000)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Relevant Federal Prevailing wage determination</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Copy of Asbestos contractor license?</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Termination clause (only over $10,000)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Affidavit (E-Verify)</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

**COMMENTS:** _______________________________________________________________________________
<table>
<thead>
<tr>
<th>Name of Owner</th>
<th>Proof of Ownership &amp; Clear Title</th>
<th>Structure Vacant &gt;12 Months</th>
<th>Signed Owner’s Consent Form</th>
<th>Demolition Inspection Write-Up</th>
<th>Asbestos Inspection</th>
<th>DNR Asbestos Post Notification</th>
<th>Landfill Disposal Receipts</th>
<th>Certification of Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### GENERAL

**Company(s) involved:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Jobs to be created/retained</th>
<th>Existing employees</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**LMI company owners:**

<table>
<thead>
<tr>
<th>Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

**Private investment release date:**

_________________________

**Pledged private investment:**

_________________________

**Amount of private investment documented:**

_________________________

**Does this amount meet or exceed the pledged amount?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**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?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**Was payroll listing compared to Employment Status Statements?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**Is job documentation on file with the grantee?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

**Breakdown of jobs and applicants:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Present Employment</th>
<th>New/Retained Jobs</th>
<th>Number Low/Mod Income</th>
<th>Number Low Income</th>
<th>Number Very Low Income</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Jobs</th>
<th>Applicants</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Direct Beneficiaries</td>
<td>Hispanic Direct Beneficiaries</td>
</tr>
<tr>
<td>Total Direct Beneficiaries</td>
<td>Hispanic Direct Beneficiaries</td>
</tr>
</tbody>
</table>

**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:**
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 DISPLACEE
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? Yes No N/A
- 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: ________________________________________________________________________________
__________________________________________________________________________________________
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
   2) 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
   2) maintain coding classification references, location, and use information
   3) 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
   2) 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.**