



CDBG Monitoring Checklist: Public Services

MONITORING CHECKLIST

<b>SUBRECIPIENT:</b>	
<b>PROGRAM/PROJECT:</b>	
<b>AGENCY - PROJECT MANAGER(S):</b>	
<b>COUNTY REVIEWER:</b>	
<b>DATE:</b>	

**2 CFR 200.300 Statutory and national policy requirements.**

(a) The Federal awarding agency must manage and administer the Federal award in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with U.S. statutory and public policy requirements: including, but not limited to, those protecting public welfare, the environment, and prohibiting discrimination. The Federal awarding agency must communicate to the non-Federal entity all relevant public policy requirements, including those in general appropriations provisions, and incorporate them either directly or by reference in the terms and conditions of the Federal award.

**24 CFR 570.506 Records to be maintained.**

Each recipient shall establish and maintain sufficient records to enable the Secretary to determine whether the recipient has met the requirements of this part. At a minimum, the following records are needed:

- (a) Records providing a full description of each activity assisted (or being assisted) with CDBG funds, including its location (if the activity has a geographical locus), the amount of CDBG funds budgeted, obligated and expended for the activity, and the provision in subpart C under which it is eligible.
- (b) Records demonstrating that each activity undertaken meets one of the criteria set forth in § 570.208.
  - (1) For each activity determined to benefit low and moderate income persons, the income limits applied and the point in time when the benefit was determined.
  - (2) For each activity determined to benefit low and moderate income persons based on the area served by the activity:
    - (i) The boundaries of the service area;
    - (ii) The income characteristics of families and unrelated individuals in the service area; and
    - (iii) If the percent of low and moderate income persons in the service area is less than 51 percent, data showing that the area qualifies under the exception criteria set forth at § 570.208(a)(1)(ii).
  - (3) For each activity determined to benefit low and moderate income persons because the activity involves a facility or service designed for use by a limited clientele consisting exclusively or predominantly of low and moderate income persons:
    - (i) Documentation establishing that the facility or service is designed for the particular needs of or used exclusively by senior citizens, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers, for which the regulations provide a presumption concerning the extent to which low- and moderate-income persons benefit; or
    - (ii) Documentation describing how the nature and, if applicable, the location of the facility or service establishes that it is used predominantly by low and moderate income persons; or
    - (iii) Data showing the size and annual income of the family of each person receiving the benefit.

## Public Services Checklist

### PUBLIC SERVICES CHECKLIST

**THE ITEMS BELOW ARE REQUIRED BY THE COUNTY AS PART OF THE PROJECT IMPLEMENTATION AND**

**DOCUMENTATION.** The subrecipient shall maintain and provide records required by the Federal regulations specified in 24 CFR 570.506. For monitoring purposes refer to 24 CFR 570.502, 2 CFR Part 200, and 24 CFR 302, 200.305, 200.306, 200.307, 200.308, 2 CFR Part 200 Subpart F – Audit Requirements, 2 CFR Part 200 Subpart E – Cost Principles, 200.302 and other records necessary to document compliance with 24 CFR 570.

ITEM	SUPPORTING DOCUMENTS	NOTES
1	<input type="checkbox"/> Project File Table of Contents	
2	<input type="checkbox"/> Project Summary Form	<i>Completed by County Staff</i>
3	<input type="checkbox"/> Subrecipient Contacts and Org Chart	
4	<input type="checkbox"/> Subrecipient Application	
5	<input type="checkbox"/> Subrecipient Agreement – Exhibit A	
6	<input type="checkbox"/> Activity Eligibility Documentation – Income limits, area definition, <input type="checkbox"/> rent limits	<i>Should be included in the Exhibits of the Agreement</i>
7	<input type="checkbox"/> Letters & correspondence with the County	
8	<input type="checkbox"/> Amendments	
9	<input type="checkbox"/> Subrecipient written procedures <ul style="list-style-type: none"> <li>➤ Grant management (Including eligibility documentation)</li> <li>➤ Purchase and financial procedures</li> <li>➤ Procurement policies &amp; procedures</li> </ul>	
10	<input type="checkbox"/> Subrecipient Proof of Insurance	
11	<input type="checkbox"/> Environmental Review	<i>Completed by County Staff</i>
12	<input type="checkbox"/> Permits	<i>Depending on project/activity</i>
13	<input type="checkbox"/> Sample of Subrecipient client intake form	
14	<input type="checkbox"/> Client profiles <ul style="list-style-type: none"> <li>➤ Race, Ethnicity, Income, Female Head of Household</li> <li>➤ Proof of income eligibility: bank statement, tax return, income eligible program</li> </ul>	
15	<input type="checkbox"/> Ledger of eligible expenses	
16	<input type="checkbox"/> Payment requests including documentation of expenses <ul style="list-style-type: none"> <li>➤ Purchase Receipts</li> <li>➤ Invoices</li> <li>➤ Payroll records</li> </ul>	
17	<input type="checkbox"/> Program Income Documentation	
18	<input type="checkbox"/> Single year audit	
19	<input type="checkbox"/> Quarterly progress reports	
20	<input type="checkbox"/> Final Completion Report	
21	<input type="checkbox"/> Affirmative Marketing Reports	
22	<input type="checkbox"/> Signed off permits	
23	<input type="checkbox"/> Recognition of project completion by city council, architect or engineer	
24	<input type="checkbox"/> Previous Monitoring Concerns/Findings	
25	<input type="checkbox"/> Active Monitoring Concerns/Findings	
26	<input type="checkbox"/> Monitoring Notification Letter	
27	<input type="checkbox"/> Monitoring Report Letter	
28	<input type="checkbox"/> Subrecipient Response to Monitoring Findings	
29	<input type="checkbox"/> Monitoring Risk Assessment	<i>Completed by the County project manager in the final closeout stage</i>

## Public Services Checklist

### OVERALL PROJECT MANAGEMENT

**§ 570.506 Records to be maintained.** (a) Records providing a full description of each activity assisted (or being assisted) with CDBG funds, including its location (if the activity has a geographical locus), the amount of CDBG funds budgeted, obligated and expended for the activity, and the provision in subpart C under which it is eligible.

**§ 570.506 Records to be maintained.** (b) Records demonstrating that each activity undertaken meets one of the criteria set forth in § 570.208.

**2 CFR 200.303 Internal Controls.** (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.

YES	NO	N/A	ITEM	APPLICATION / AWARD – OVERALL GRANT MANAGEMENT
			5	Does the file contain a copy of the Subrecipient Agreement containing a full description of activity carried out including the location, amount of CDBG, and other funds budgeted, obligated and expended for the activity?
			3	Is there clear documentation of staff/positions dedicated to CDBG Project management with updated contact information? (Who oversees day to day administration of the program?) i.e. Organization Chart/Financial Internal Control Organization
			4	Does the project file contain a copy of the Grant Application?
			5	Does the file contain a copy of the Subrecipient Agreement including Exhibit A – Project Parameters?
			6	Does the file contain the applicable activity eligibility documentation to meet a National Objective? <ul style="list-style-type: none"> <li>➤ Income Limits (LMI)</li> <li>➤ Area Definition (LMA)</li> <li>➤ Rent Limits (Housing)</li> </ul>
			7	Has the Subrecipient maintained a record of letters and correspondence with the County? <ul style="list-style-type: none"> <li>➤ Letter(s) informing the subrecipient of funding awards, written notices, etc.</li> <li>➤ Letter(s) requesting amendments, with justification(s) (Optional, as needed)</li> <li>➤ Authorization to incur costs</li> </ul>
			8	Subrecipient Agreement amendments # _____ (Optional, as needed)
			9	Does the Subrecipient maintain written procedures describing its management of the CDBG program, including the eligibility documentation of activities and clients? <ul style="list-style-type: none"> <li>➤ Provide written procedures</li> </ul>
			9	Does the Subrecipient have a system in place to collect/track the beneficiary characteristics/financial progress? (CAPER and timely spend down) <ul style="list-style-type: none"> <li>➤ Provide written purchase and financial procedures/policies</li> </ul>
			10	Does the Subrecipient supply the current and appropriate proof of insurance to provide the activity?

Other documents, comments and/or concern(s)/recommendation(s), finding(s)/corrective action(s) cited:

## Public Services Checklist

### PRE-ACTIVITY DELIVERY

§ 570.208 *Criteria for national objectives.* (a) *Activities benefiting low- and moderate-income persons.*

§ 570.506 *Records to be maintained.* (b) *Records demonstrating that each activity undertaken meets one of the criteria set forth in § 570.208.*

YES	NO	N/A	ITEM	PRE-ACTIVITY DELIVERY
			11	Has the Environmental Review/NEPA been completed by County Staff? (§570.503(b)(5))
			12	Has the Subrecipient obtained the appropriate permits prior to the implementation of the activity? Permits (Coastal, Land Use, Building, etc.) _____ _____

**Subrecipients shall maintain individual client files for each client served by the CDBG funded activity.**

YES	NO	N/A	ITEM	CLIENT PROFILE
			13	Does the Subrecipient implement an intake system to track clients and services provided? ➤ Provide sample intake form
			14	Does the Subrecipient record accurate household information? i.e. size, income, head of household
			14	Has the Subrecipient collected racial and ethnic characteristics of each client?

YES	NO	N/A	ITEM	CLIENT INCOME ELIGIBILITY DOCUMENTATION
			14	What is the target population for this project? (Low/mod, or Limited Clientele?) _____ Does the Subrecipient document that the <i>activity</i> is limited to one or a combination of the 8 population segments presumed to be low- and moderate-income by HUD: (abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Population Report's definition of "severely disabled", homeless persons, illiterate adults, persons living with AIDS, migrant farm workers)?
			14	Has the Subrecipient followed the process or procedure for client eligibility documentation described in Exhibit A of the Subrecipient Agreement? i.e. bank statement, tax return, other income eligible programs (§ 570.208(a)(3) & § 570.506(b)(4)(iii))
			14	For projects targeting 'Limited Clientele,' has the Subrecipient collected documentation of client's limited clientele status? (§ 570.208(a)(2)(i)(A) & § 570.506(b)(3)(i))
			14	Has the Subrecipient documented at least 51% of persons benefiting from the activity are of low or moderate income? (§ 570.208(a))

YES	NO	N/A	ITEM	L/M AREA BENEFIT
			6	For each project determined to benefit low and moderate-income persons based on the Low-Mod Area (LMA) served by the activity, are the boundaries of the service area defined?
			6	Is the percent of persons served within the area boundary at least 51% low- and moderate-income?

Other documents, comments and/or concern(s)/recommendation(s), finding(s)/corrective action(s) cited:

## Public Services Checklist

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### ACTIVITY IMPLEMENTATION

**2 CFR 200.302 Financial Management.; § 570.509 Grant closeout procedures.**

**§ 570.506 Records to be maintained.** (h) Financial records, in accordance with the applicable requirements listed in § 570.502, including source documentation for entities not subject to 2 CFR part 200. Grantees shall maintain evidence to support how the CDBG funds provided to such entities are expended.

YES	NO	N/A	ITEM	FINANCIAL RECORDS
			15	Did the Subrecipient maintain a ledger of eligible expenses?
			16	Are eligible expenses recorded with appropriate source documentation, time records (staff admin) and materials (copies of invoices)?
			16	Has the Subrecipient retained all financial records, supporting documents, statistical records, and all other records pertinent to the subrecipient agreement and Federal regulations?
			16	Does the file contain a record of submitted Requests for Payment(s)?
			16	Do subrecipient accounting records reconcile with those of the County?
			17	PROGRAM INCOME: Does the subrecipient follow the appropriate guidelines for program income? (24 CFR 570.502(a)(4) Exhibit 3-18, Section F, HUD Checklist)
			18	Has the subrecipient provided an Audit report? (Single audit for each year, any other audits)

**Progress Reports Due:** (Provide Progress Reports submitted according to the subrecipient agreement.)

- Qtr 1 (July-August) Original Submission Date: \_\_\_\_\_
- Qtr 2 (September-December) Original Submission Date: \_\_\_\_\_
- Qtr 3 (January-March) Original Submission Date: \_\_\_\_\_
- Qtr 4 (April-June) Original Submission Date: \_\_\_\_\_

**Final Report Due:** (Provide final report submitted according to the subrecipient agreement.)

- Original Submission Date: \_\_\_\_\_

YES	NO	N/A	REPORTS
		19	Did the Subrecipient submit the required Progress reports as scheduled in the Exhibit A?
		19	Are the progress reports recorded in the project file?
		20	Has the Subrecipient submitted a Final Completion Report?
		21	Has the Subrecipient submitted the quarterly Affirmative Marketing Reports in a complete and timely manner?

Other documents, comments and/or concern(s)/recommendation(s), finding(s)/corrective action(s) cited:

## Public Services Checklist

### POST ACTIVITY / MONITORING

Maintain client data for five years at minimum demonstrating client eligibility. Data shall include, but not be limited to, client name, address, income level or other basis for determining eligibility, and description of service provided.

**570.502 (a)(7)(ii)(A) The retention period for individual CDBG activities shall be the longer of 3 years after the expiration or termination of the subrecipient agreement under § 570.503, or 3 years after the submission of the annual performance and evaluation report, as prescribed in § 91.520 of this title, in which the specific activity is reported on for the final time;**

YES	NO	N/A	ITEM	PROJECT CLOSEOUT & MONITORING
			21	Have the required permits for the activity been signed off?
			23	Has the appropriate body acknowledged the completion of the project?
			24	Have any outstanding findings or concerns from previous monitoring process been addressed?
			25	Have any outstanding findings or concerns from the current monitoring process been addressed?
			26	Monitoring Notification Letter
			27	Monitoring Report Letter
			28	Has the Subrecipient appropriately documented their response to the monitoring findings?
			29	Has the Subrecipient been briefed on their Monitoring Risk Assessment for future monitoring visits?

Other documents, comments and/or concern(s)/recommendation(s), finding(s)/corrective action(s) cited