



Office of Community Development-Disaster Recovery Unit

*Exhibit 12-3
Compliance Monitoring Core Checklist Template*

Revised July 20, 2016

Compliance Monitoring Core Checklist Template

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1. Instructions and Monitoring Prep

This Checklist should be used to determine if the Subrecipient's policies and procedures for the core administrative systems (i.e. financial, procurement, contracting, and monitoring) meet minimum requirements and to verify the effectiveness of these systems at the Subrecipient level. This Checklist should also be used to review the Subrecipient's financial management system, Subrecipient management practices, and civil rights compliance.

The Monitor should execute this Checklist prior to completing the Project Monitoring Checklist.

The Project Monitoring Checklist should highlight any deficiencies within any administrative systems that are not covered in this Core Checklist. The Monitor should use the OCD Disaster Recovery CDBG Grantee Administrative Manual for guidance on the topics covered within this Checklist. This Manual is located at <http://www.doa.louisiana.gov/cdbg/dr/dradmin-manual.htm>.

The following steps should be taken to perform a review:

1. Review the following to obtain an understanding of the Subrecipient requirements:
 - a. Governing statutes, regulations and official guidance;
 - b. Waivers.
 - c. Grant Agreements and other Binding Agreements;
 - d. Action Plans and Amendments; and,
 - e. Approved Program documents
2. Collect and Review the documentation referenced in Subsection 1.3.
3. Execute the Checklist by providing the appropriate response in the "Response" column. Mark any issues in the "Issue Type" column. If an issue [deficiency] is identified, corrective actions and/or technical assistance may be required. Technical assistance may also be required for any concerns noted. Notate whether corrective actions or technical assistance should be provided within the "Comments" column.

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

1.1 Monitoring Preparation		
Requirements	Response	Comments
Description: Execute this Section to confirm that all pre-monitoring activities have been completed.		
1. Did you review all grant requirements, action plans, amendments and waivers?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Did you review contract terms, payment terms, and budget?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Did you review monitoring requirements as contained in the Binding Agreement?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4. Did you coordinate with appropriate reporting staff and any other required department to ensure all data/information has been captured in current reporting?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Did you review prior year audits, monitoring efforts and results, and documentation supporting completed or ongoing corrective actions?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6. Did you review relevant documentation and reporting to determine current program progress, status, performance, and compliance for monitoring planning purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7. Did you schedule meetings with relevant Grantee/ Recipient/Subrecipient staff to discuss program, current performance, issues and contract terms?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8. Did you set up program monitoring files and collect all relevant documents (see Section 1.3)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9. Did you draft and send a monitoring notification letter to the Subrecipient and request relevant documents to review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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Subrecipient :

Monitor:

Date Completed:

1.2 Entrance Conference		
Requirements	Response	Comments
Description: An Entrance Conference should be conducted to “kick off” the monitoring visit. This is especially important for onsite reviews. Use this Section to document these pre-monitoring activities.		
1. Was an Entrance Conference Conducted? List the date, time, and location.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Was a log taken of all attendees? List the names and titles of all persons in attendance (or attach a copy of the sign-in log).	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Were designated points of contact identified to assist with the monitoring engagement? List the name, title, assigned area, and contact information for the designated personnel.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4. Was an agenda drafted and were meeting notes taken to document the topics discussed during the Entrance Conference? List the topics discussed (or attach a copy of the meeting notes).	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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Subrecipient : _____ **Monitor:** _____ **Date Completed:** _____

1.3 Documentation Collection

Document	For Use in Section	Date Received (or N/A)	Comments
Description: This Section provides a list of documents required to answer the questions within this Checklist. Execute this Section prior to beginning the review.			
1. Procurement Policies and Procedures	2.1		
2. Contracting Policies and Procedures	2.2		
3. Financial Management Policies and Procedures	2.3		
4. Monitoring Policies and Procedures	2.4		
5. Record Keeping Policies and Procedures (onsite only)	2.5		
6. Most Recent Draw Request/Request for Payment and supporting documentation	3.4		
7. Appropriate Audit/Financial Report			
7.1. A Single Audit if the Subrecipient has \$750,000 or more in federal funds within a fiscal year	3.3		
7.2. Annual sworn financial statement if revenue received was \$50,000 or less	3.3		
7.3. Annual compilation if revenue received was more than \$50,000 but less than \$200,000	3.3		
7.4. An annual review along with the required agreed upon procedure report if revenue received was \$200,000 or more but less than \$750,000	3.3		
8. Federally Approved Indirect Cost Plan, if applicable	3.4		
9. 504 Self Evaluation	4.1		
10. Section 504 Assurance	4.1		
11. Evidence of the administration of a Fair Housing Activity	4.2		
12. Title VI Record Documentation	4.3		

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Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
2.1 Procurement Policies and Procedures			
<p>Description: Execute this Section to determine if the Subrecipient is in compliance with applicable regulations.</p> <p>Regulations: 24 CFR 84.44, 24 CFR 85.36, and 24 CFR 570.502, 2 CFR 200.317-326</p>			
<p>1. Does the Subrecipient have procurement policies and procedures in place? [24 CFR 85.36; 24 CFR 84.44; 2 CFR 200.318]</p> <p><i>If no, the remaining questions within this Section are not applicable. Technical Assistance should be provided.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Have the Subrecipient's procurement policies and procedures been reviewed during a previous monitoring review?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2.1. Have any issues been discovered based on prior reviews of the Subrecipient's procurement policies and procedures or have any revisions been made since the previous review?</p> <p><i>If No, mark the remaining questions in this Section as "N/A".</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Are the policies and procedures documented?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>4. Does the Subrecipient have a process in place for communicating policies and procedures (including updates) to staff?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
Procurement Policies and Procedures Requirements			

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>5. <u>Requirements</u> - Do the Procurement policies and procedures include a Code of Conduct?</p> <p>24 CFR 85.36, 24 CFR 84.42 and 2 CFR 200.318 requires the Code of Conduct to contain these minimum requirements:</p> <ul style="list-style-type: none"> • No employee, officer or agent of the Grantee/ Recipient/ Subrecipient or sub Grantee/ Recipient/ Subrecipient shall participate in selection, or in the award or administration of a contract supported by Federal funds if a conflict of interest would be involved • Officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub-agreements • Penalties, sanctions, or other disciplinary actions for violations are included • The Code of Conduct is consistent with the Louisiana Code of Governmental Ethics (Louisiana Revised Statutes 42:1101) 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>6. <u>Requirements</u> - Do the Procurement policies and procedures include guidance on using the appropriate solicitation methods, contract types and contract price?</p> <p>For Grantees/ Recipients, 24 CFR 85.36(b)(9) and 2 CFR 200.318 and 323 requires:</p> <ul style="list-style-type: none"> • Only one of the solicitation methods (Small Purchase, Sealed Bid/formal advertising, Competitive Proposals, Noncompetitive Proposals) are employed for each procurement • The requirements for the applicable solicitation method are followed • Only the appropriate contract types (Purchase Order, Fixed Price, Cost Reimbursement) are employed for each procurement • A “cost plus a percentage of cost” or a “percentage of construction cost” type pricing is not used for contracts • A “time and material” type contract is only used after a determination is made that no other contract is suitable and the contract includes a ceiling price that the contractor exceeds at its own risk • Contract is price appropriately, as determined by contract services (Lump sum pricing, unit pricing, or reimbursement of costs) • Recipients avoid purchasing unnecessary items. • Where appropriate, an analysis is made of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal Government. • Solicitations for goods and services provide for the following: <ul style="list-style-type: none"> • A clear and accurate description of the technical requirements for the material, product or service to be procured • Requirements which the bidder/offeror must fulfill and all other factors to be used in evaluating bids or proposals. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>7. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement that staff review proposed procurements for Cost reasonableness?</p> <p>24 CFR 85.36; 24 CFR 84.45, 84.84 and 2 CFR 200.323 requires that cost reasonableness is reviewed:</p> <ul style="list-style-type: none"> • To avoid unnecessary purchases; • To avoid duplicative purchases, and; • Ensure costs are reasonable. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

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Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>8. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement that staff review proposed procurements to ensure contractors are eligible?</p> <p>24 CFR 85.35; 24 CFR 84.13 and 2 CFR 180 requires that awards are not made to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549, "Debarment and Suspension".</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>9. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement that affirmative efforts be undertaken to hire women's business enterprises, minority firms and labor surplus firms?</p> <p>[24 CFR 85.36(e); 24 CFR 84.44(b), 24 CFR 84.84(e)(2), 2 CFR 321]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>10. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement that all disputes relating to procurement actions be handled, resolved, and disclosed?</p> <p>[24 CFR 85.36(b)(12); 24 CFR 84.84; 2 CFR 200.318(k)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>11. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement that all procurements be conducted using "open and free competition," unless an exception applies?</p> <p>[24 CFR 85.36(c); 24 CFR 84.84(d), 2 CFR 200.319]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>12. <u>Requirements</u> - Do the Procurement policies and procedures include a requirement to eliminate unfair competitive advantages in procurements?</p> <p>[24 CFR 85.36(c); 24 CFR 84.84(d); 24 CFR 84.43; 2 CFR 200.319]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
2.2 Contract Administration Policies and Procedures			
<p>Description: Use this Section to determine if the Subrecipient has developed a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. This section provides best practices that may be utilized in an adequate contract administration system.</p> <p>Regulation: 24 CFR 85.36(b)(2), 24 CFR 84.47, 24 CFR 84.84(h), 2 CFR 200.318</p>			
<p>1. Does the Subrecipient have contract administration policies and procedures in place? <i>If no, the remaining questions within this Section are not applicable. Technical Assistance should be provided.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Has the Grantee/ Recipient/ Subrecipient’s contract administration policies and procedures been reviewed during a previous monitoring review?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2.1. Have any issues been discovered based on prior reviews of the contract administration policies and procedures or have any revisions been made since the previous review? <i>If No, mark the remaining questions in this Section as “N/A”.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Are the policies and procedures documented?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>4. Does the Subrecipient have a process in place for communicating policies and procedures (including updates) to staff?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>5. Are the Subrecipient’s contract administration policies and procedures adequate?</p> <p>Contract Administration best practices include:</p> <ul style="list-style-type: none"> • Utilizing Contract Templates for developing contract; • Identifying a contract administrator for each contract executed; • Implementing a process to ensure contractor abides by the terms of the contract procedures; • Implementing a deliverable review/approval process; and, • Implementing a process for managing issues that may arise with the contractor. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<u>Isaac Only</u>			
Grantees implementing projects utilizing funding from the Hurricane Isaac allocation are required to meet these guidelines.			
6. Does the Subrecipient maintain a record of achieving certification of a comprehensive green building program or completion of the HUD CPD Green Building Retrofit Checklist, as appropriate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6.1 If yes, proceed to question 2.			
6.2 If no, is the Subrecipient exempt from meeting the green building standard?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. Did the Subrecipient require procured contracts to contain (1) performance measures and associated penalties and (2) a period of performance or the date of completion?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
8. If an Action Plan Amendment is submitted after 11/18/2013, did the subrecipient describe its process for the selection and design of green infrastructure projects or activities, and/or how selected projects or activities will incorporate green infrastructure components? (Per Fed. Reg. 78 No. 222)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.3 Financial Management Policies and Procedures			
Description: Use this Section to determine if the Grantee Recipient/Subrecipient's financial management policies and procedures meet the requisite standards. Regulations: 24 CFR 84.21, 24 CFR 85.20, 24 CFR 570.502, 2 CFR 200.302			
1. Does the Subrecipient have financial management policies and procedures in place? <i>If no, the remaining questions within this Section are not applicable. Technical Assistance should be provided.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Have the Subrecipient's financial management policies and procedures been reviewed during a previous monitoring review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>2.1. Have any issues been discovered based on prior reviews of the Subrecipient's financial management policies and procedures or have any revisions been made since the previous review?</p> <p><i>If no, mark "N/A" for the remaining questions in this Section.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Are the policies and procedures documented?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>4. Does the Subrecipient have a process in place for communicating policies and procedures (including updates) to staff?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
Financial Management Policy and Procedures Requirements			
<p>5. <u>Internal Controls Requirements</u> - Do the financial management policies and procedures require defined staff qualifications and duties, lines of authority, and separation of functions?</p> <p>[24CFR85.20(b)(3) and 84.21(a)(3), 2 CFR 200.303]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>6. <u>Internal Controls Requirements</u> - Do the financial management policies and procedures require control over secure access to assets, blank forms, and confidential documents?</p> <p>[24CFR85.20(b)(3) and 84.21(b)(3), 2 CFR 200.303]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>7. <u>Internal Controls Requirements</u> - Do the financial management policies and procedures include a process for approving and recording transactions?</p> <p>[24CFR85.20(b)(3) and 84.21(b)(3), 2 CFR 200.303]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>8. <u>Internal Controls Requirements</u> - Do the financial management policies and procedures include a process to periodically compare financial records to actual assets and liabilities?</p> <p>[24CFR85.20(b)(4) and 84.21(b)(4), 2 CFR 200.303]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>9. <u>Support Documentation Requirement</u> - Do the financial management policies and procedures require that documentation (receipts, invoices, canceled checks, etc.) is available to support accounting record entries?</p> <p>[24CFR85.20(b)(6) and 84.21(b)(7), 2 CFR 200.302]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>10. <u>Allowable Cost Requirement</u> - Do the financial management policies and procedures clearly define reasonableness, allowability, and allocability of costs incurred that's consistent with 2 CFR 200.302</p> <p>[24CFR85.20(b)(5) and 84.21(b)(6)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>11. <u>Financial Reporting Requirement</u> - Do the financial management policies and procedures require that financial statements and reporting are complete, current, reviewed periodically and provide complete disclosure of the financial results of each Federally-sponsored project or program?</p> <p>[24CFR85.20(b)(1) and 84.21(b)(1), 2 CFR 200.302]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>12. <u>Financial Reporting Requirements</u> - Do the Subrecipient's financial management policies and procedures require that all of the following required HUD CDBG activities are captured within its reports?</p> <ul style="list-style-type: none"> • Amount budgeted • Advances/reimbursements received to date • Program income & other miscellaneous receipts • Actual expenditures/disbursements • Current encumbrances/obligations • Unpaid requests for payments <p>[24CFR84.52 and 24CFR85.41, 2 CFR 200.302]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>13. <u>Cash Management Requirement</u> - Do the financial management policies and procedures include a process to accurately project the cash needs of the organization?</p> <p>[24CFR85.20(b)(7) and 84.21(b)(5), 2 CFR 200.305]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
14. <u>Audits and Audit Findings Requirements</u> - Do the financial management Policies and Procedures require that audits are conducted in a timely manner and in accordance with applicable standards, including a systematic method to assure timely and appropriate resolution of audit findings and recommendations?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.4 Monitoring Policies and Procedures			
<p>Description: Use this Section to determine if the Subrecipient’s monitoring policies and procedures sufficiently outline the monitoring of each project, program, function or activity to assure compliance with applicable Federal requirements and that performance goals are being achieved.</p> <p>Regulations: 24 CFR 84.51; 24 CFR 85.40, 2 CFR 200.327 and 328</p>			
1. Does the Subrecipient have monitoring policies and procedures in place? <i>If no, the remaining questions within this Section are not applicable. Technical Assistance should be provided.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Have the Subrecipient’s monitoring policies and procedures been reviewed during a previous monitoring review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.1. Have any issues been discovered based on prior reviews of the monitoring policies and procedures or have any revisions been made since the previous review? <i>If yes, continue through this Section. If no, continue to next Section.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Are the policies and procedures documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Does the Subrecipient have a process in place for communicating policies and procedures (including updates) to staff?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<p>5. Do the monitoring policies and procedures provide guidance on conducting, documenting, and reporting on monitoring activities and on follow up on areas of non-compliance?</p> <p>Monitoring best practices may include:</p> <ul style="list-style-type: none"> • Prioritizing based on Risk • Prescribing a Sampling methodology • Monitoring Performance • Implementing a tracking system • Technical Assistance procedures 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>6. Do the monitoring policies and procedures include monitoring Project/Program performance?</p> <p>Monitoring best practices may include monitoring based on:</p> <ul style="list-style-type: none"> • Compliance with approved application scope, funding specifications, and other requirements • Program guidelines • Implementation schedule and milestones <p>[24CFR84.51 and 24 CFR 85.40, 2 CFR 200.328]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.5 Record Keeping Policies and Procedures – ONSITE ONLY			
<p>Description: Use this Section to determine if the Subrecipient’s Record Keeping Policies and Procedures are sufficient. Regulations: 24 CFR 85.40, 24 CFR 84.53, 24 CFR 570.506, and 24 CFR 570.490 and 2 CFR 330. 329, and 333</p>			
<p>1. Does the Subrecipient have Record Keeping policies and procedures in place?</p> <p><i>If no, mark “No” for the remaining questions in this Section.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Have the Subrecipient’s record keeping policies and procedures been reviewed during a previous monitoring review?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2.1. Have issues been discovered based on prior reviews of the record keeping policies and procedures or have any revisions been made since the previous review?</p> <p><i>If no, mark “N/A” for the remaining questions in this Section.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Are the policies and procedures documented?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>4. Does the Subrecipient have a process in place for communicating policies and procedures (including updates) to staff?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
Recordkeeping Policies and Procedures			
5. Do the recordkeeping policies and procedures describe the information that needs to be collected and why?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6. Do the recordkeeping policies and procedures describe when the information should be collected and how often?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. Do the recordkeeping policies and procedures describe how the information should be acquired, organized (in an orderly manner that provides ease of examination by any applicable parties and stored in a secure, central location)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
8. Do the recordkeeping policies and procedures describe how the information should be reported?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
9. Do the recordkeeping policies and procedures describe the required retention period for records (minimum of five years)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
10. <u>Access to Records</u> – Do the record keeping procedures provide access to records and/or personnel by authorized agencies and/or citizens as required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.6 Duplication of Benefits			
<p>Description: Use this Section to determine if the Grantee/Subrecipient has a Duplication of Benefits Policy.</p> <p>Regulations: Robert T. Stafford Disaster Relief and Emergency Assistance Act</p>			
1. Does the Grantee/Subrecipient have an adopted Duplication of Benefits policy? <i>Note: See Exhibit 2-6 Sample Duplication of Benefits Policy.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
3.1 Establishing DR CDBG Funds Account			
Description: Use this Section to assure that the applicable process has been followed to establish the Subrecipient's DR CDBG Funds Account.			
1. Has the Subrecipient's disaster recovery CDBG funds account been reviewed during a previous monitoring review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
1.1. Have any issues been discovered based on prior reviews of the Subrecipient's DR CDBG funds account? <i>If no, mark "N/A" for the remaining questions in this Section.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Has the Subrecipient setup a non-interest bearing account for disaster recovery funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Is the Subrecipient using its general bank account?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.1. If the Subrecipient is using this account, is this an interest-bearing account? Note: If interest is accrued on Disaster Recovery CDBG funds, the OCD-DRU must collect it from the Subrecipient.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Is the account used by the Subrecipient FDIC insured?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4.1. If applicable, is the bank providing collateral to secure all funds in excess of FDIC limits?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.2 Financial Administration			
Description: Review the Subrecipient's Financial Administration System and use this Section to assure that it meets the standards set forth in 24 CFR 84.21, 24 CFR 85.20, and 24 CFR 570.502 and 2 CFR 200.302			
1. Has the Subrecipient's financial administration system been reviewed during a previous monitoring review?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
1.1. Were issues identified in previous reviews? <i>If yes, continue through this Section. If no, continue to next Section.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Has the Subrecipient designated someone to be responsible for financial management?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
3. Does the Subrecipient have an accounting system in place that allows for the tracking of receipts and expenditures and the generation of financial statements?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.1. Is the Subrecipient accounting for the Disaster Recovery CDBG funds using a modified accrual basis?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.2. Is the Subrecipient tracking and reporting on each project separately?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.3 Financial Reporting and Audits			
<p>Description: Use this Section to assure compliance with audit/reporting requirements.</p> <p>Regulations: 24 CFR 84.26 and/or 24 CFR 85.26; 2 CFR Part 200.500</p>			
1. Has the Subrecipient conducted a Single Audit, if required? A Single Audit is required if the Subrecipient has expended \$750,000 or more in federal funds within a fiscal year. Obtain the nine digit EIN off of the W-9 and use harvester.census.gov/sac to determine if the Single Audit was submitted.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. If Single Audit is not required, has the Grantee/ Recipient/Subrecipient submitted the other appropriate financial report? <ul style="list-style-type: none"> • Annual sworn financial statement if revenue received was \$50,000 or less • Annual compilation if revenue received was more than \$50,000 but less than \$200,000 • Annual Review, plus agreed upon procedures if revenue received was \$200,000 or more but less than \$750,000 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Were findings disclosed in the financial statements that related to issues with internal control and/or compliance with laws, regulations, and provisions of contracts or grant agreements? <i>If yes, document management's response to these findings and set time frame to ensure these issues were corrected.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.4 Expenditure Review			
<p>Description: Use this Section to assure that Subrecipient's expenditures are in compliance with applicable requirements by reviewing the most recent Request for Payment and answering the following questions accordingly.</p>			
1. Do the Requests for Payment submitted by the Subrecipient include the appropriate certifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
2. If there's program income, is the Grantee/ Recipient/Subrecipient disbursing program income prior to making further draw requests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Has the Subrecipient charged any indirect costs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3.1. If yes, did the Subrecipient submit a federally-approved Indirect Cost Plan to OCD-DRU?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Are the Subrecipient's administrative costs at or below the authorized threshold?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5. <u>Internal Controls</u> – Is there evidence that there are appropriate separation of duties in the approving of a Request for Payment and the payment of invoices?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
4.1 Section 504			
Description: Section 504 of the Rehabilitation Act of 1973, as amended, requires that no handicapped individual can be excluded from participation (including employment), denied program benefits, or subjected to discrimination based solely on his or her handicap.			
1. Has the Subrecipient's Section 504 Compliance been previously reviewed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
1.1. Were issues identified during the previous review? <i>If yes, continue through this Section. If no, continue to next Section.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Has the Subrecipient submitted a Section 504 Self Evaluation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Has the Subrecipient completed the Section 504 Assurance?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Have any complaints been received?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4.1. If yes, have the complaints been resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	N/A	
4.2 Fair Housing			
Description: Title VIII of the Civil Rights Act of 1968, as amended (referred to as the "Fair Housing Act") prohibits discrimination in housing on the basis of race, color, religion, sex, or national origin. The Subrecipient is required to administer at least one fair housing activity annually.			
1. Is the Subrecipient ensuring that all activities are implemented to affirmatively promote fair housing?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
2. Has the Subrecipient administered at least one fair housing activity within the last year? Notate the date and identify the type of activity of the most recent fair housing activity within the Comments field.	<input type="checkbox"/> Yes <input type="checkbox"/> No		
3. Have any complaints been received?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
3.1. If yes, have the complaints been resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
4.3 Title VI			
<p>Description: Title VI of the Civil Rights Act of 1964 states that no person shall be excluded from participation, denied program benefits, or subjected to discrimination on the basis of race, color, or national origin.</p>			
<p>1. Is the Subrecipient maintaining a record of applicants, direct and indirect beneficiaries by race, color, sex, national origin, age and handicap to ensure compliance with Title VI of the Civil Rights Act of 1964?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Have any complaints been received?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2.1. If yes, have the complaints been resolved?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4.4 Section 3			
Requirement	Response	Issue	Comments
<p>Description: Section 3 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701u and 24 CFR Part 135] is HUD’s legislative directive for providing preference to low- and very low-income residents of the local community (regardless of race or gender), and the businesses that substantially employ these persons, for new employment, training, and contracting opportunities resulting from HUD-funded projects. A “covered project” is a project for which Section 3 applies. “Covered funds” are those funds used to fund a “covered project”.</p> <p>This Section of the Core Checklist is to be used to determine if Section 3 is triggered for the Grantee/ Recipient/ Subrecipient and, if applicable, that the Subrecipient has procedures in place for ensuring compliance. Implementation of the Subrecipient’s Section 3 procedures will be reviewed using the project checklist by reviewing RFPs, contracts, contractor Section 3 procedures and other supporting documentation.</p> <p><i>Section 3 Residents are:</i></p> <ul style="list-style-type: none"> • Residents of Public and Indian Housing, or • Individuals that reside in the metropolitan area or nonmetropolitan parish in which the Section 3 covered assistance is expended and whose income does not exceed the local HUD income limits set forth for low- or very low-income households. <p><i>Section 3 Business Concerns are One of the Following:</i></p> <ul style="list-style-type: none"> • Businesses that are 51 percent or more owned by Section 3 residents; • Businesses with 30 percent or more permanent, full-time employees whom are currently Section 3 residents, or were Section 3 residents within three years of the date of first employment; or • Businesses that provide evidence of a commitment to subcontract in excess of 25 percent of the dollar amount of all subcontracts to be awarded to businesses that meet the qualifications described above. 			
<p>1. Has the Subrecipient allocated \$200,000 or more DR-CDBG funds into projects/activities involving housing construction, demolition, rehabilitation, or other public construction— i.e., roads, sewers, community centers, etc.? <i>If no, mark “N/A” for the remaining questions within this Section.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
2. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how Section 3 residents are to be notified about employment and training opportunities generated by program participant or its contractors as a result of the expenditure of covered financial assistance? [24CFR 135.32 (a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how Section 3 business concerns are to be notified about contracting (or subcontracting) opportunities generated by the program participant or its contractors involving covered financial assistance? [24 CFR 135.32 (a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how applicable entities are notified about their requirements pursuant to Section 3? [24 CFR 135.32(b) and 24 CFR 135.32(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how compliance with the requirements of Section 3 will be monitored? [24 CFR 135.32(d) and 24 CFR 135.32(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") describing the steps taken to facilitate meeting the minimum numerical goals for employment and contracting opportunities? [24 CFR 135.32(c)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Core Checklist Template

Grantee/ Recipient/ Subrecipient :

Monitor:

Date Completed:

5. File Review – ONSITE ONLY

Requirements		Response	Issue Type	Comments
<p>Instructions: Use this Section to indicate the completeness of the files reviewed during the onsite review. Refer to Section 4 of the OCD Disaster Recovery CDBG Grantee Administrative Manual for a list of documents that should be kept in each file. Additionally, if a Project Review has recently occurred (or is underway), the Monitor may use the results of the Project Review to draw conclusions regarding the sufficiency of the files.</p>				
1. Are the Subrecipient’s General files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
2. Review the Subrecipient’s Citizen Participation Files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
3. Pull a sample of the Subrecipient’s Procurement and Contracting files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
4. Pull a sample of the Subrecipient’s Management/Personnel files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
5. Pull a sample of the Subrecipient’s monitoring files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
6. Pull a sample of the Subrecipient’s Acquisition files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
7. Pull a sample of the Subrecipient’s Relocation files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
8. Pull a sample of the Subrecipient’s Section 504 files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
9. Pull a sample of the Subrecipient’s Equal Opportunity files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
10. Pull a sample of the Subrecipient’s Labor files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
11. Pull a sample of the Subrecipient’s audit files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
12. Pull a sample of the Subrecipient’s Environmental Review files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
13. Pull a sample of the Subrecipient’s Close-Out files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		
14. Pull a sample of the Subrecipient’s National Objective / Eligible Activities files. Are the files adequate?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern		