



CDBG Monitoring Checklist: Public Facilities

MONITORING CHECKLIST

Table with 2 columns and 5 rows: SUBRECIPIENT, PROGRAM/PROJECT, AGENCY - PROJECT MANAGER(S), COUNTY REVIEWER, DATE.

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...

24 CFR 570.506 Records to be maintained.

(b)(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...
(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.



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PUBLIC FACILITIES 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 Eligibility Summary Form	<i>Completed by County Staff</i>
3	<input type="checkbox"/> Subrecipient Contacts and Org Chart	
4	<input type="checkbox"/> Subrecipient Application	<i>Include attachments requested, such as Audit</i>
5	<input type="checkbox"/> Subrecipient Agreement – Exhibit A	
6	<input type="checkbox"/> Letters & correspondence with the County	
7	<input type="checkbox"/> Amendments	
8	<input type="checkbox"/> Subrecipient written procedures <ul style="list-style-type: none"> ➤ Grant management (Including eligibility documentation) ➤ Purchase and financial procedures ➤ Procurement policies & procedures 	
9	<input type="checkbox"/> Subrecipient Proof of Insurance	
10	<input type="checkbox"/> Environmental Review	<i>Completed by County Staff</i>
11	<input type="checkbox"/> Permits	<i>(as needed)</i>
12	<input type="checkbox"/> Procurement documentation <ul style="list-style-type: none"> ➤ Project cost analysis/Estimate ➤ Bid Packet & Addendums ➤ Advertisement of Bid/Affidavit ➤ Bids/Quotes Received ➤ Pre-Bid Meeting Sign-in sheet ➤ Bid award ➤ Wage Determination Lock-In Notice ➤ Applicable Federal Wage Decision 	<i>(Small purchases, professional services, or competitive sealed bids, depending on project)</i>
13	<input type="checkbox"/> SAM checks for contractors/subs	
14	<input type="checkbox"/> Contract Award Decision - Minutes	
15	<input type="checkbox"/> Subrecipient/Prime Contractor Contract	
16	<input type="checkbox"/> Contractor/Subcontractor Contracts	
17	<input type="checkbox"/> Pre-construction Meeting Acknowledgement	
18	<input type="checkbox"/> Contractor & subcontractor certification forms	
19	<input type="checkbox"/> Proof of Insurance of contractor/subcontractor	
20	<input type="checkbox"/> Contractor/Subcontractor Licenses & Bonding	
21	<input type="checkbox"/> Wage Decision Lock-In Form	
22	<input type="checkbox"/> Notice to Proceed to Subrecipient	
23	<input type="checkbox"/> Final project plans/specs	
24	<input type="checkbox"/> MBE/WBE Documentation	<i>(as needed)</i>
25	<input type="checkbox"/> Section 3 Documentation	<i>(as needed)</i>
26	<input type="checkbox"/> Client Eligibility Documentation	
27	<input type="checkbox"/> Land Acquisition	
28	<input type="checkbox"/> Displacement & Relocation Plan	
29	<input type="checkbox"/> Construction <ul style="list-style-type: none"> ➤ Daily reports from site manager 	

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	<ul style="list-style-type: none"> ➤ Change orders ➤ Lead based paint ➤ Section 504 	
30	<input type="checkbox"/> Davis Bacon and Related Acts Documentation <ul style="list-style-type: none"> ➤ Proof of posters on site ➤ Weekly certified payrolls ➤ Applicable federal wage decision ➤ Labor interviews 	
31	<input type="checkbox"/> Signed off Permits	
32	<input type="checkbox"/> Financial <ul style="list-style-type: none"> ➤ Ledger of eligible expenses ➤ Payment requests, including documentation of expenses <ul style="list-style-type: none"> ○ Purchase Receipts ○ Invoices 	
33	<input type="checkbox"/> Quarterly Progress Reports	(Exhibit E)
34	<input type="checkbox"/> Final Completion Report	
35	<input type="checkbox"/> Construction – photo documentation	
36	<input type="checkbox"/> Single Audit (most recent)	
37	<input type="checkbox"/> Lien releases	
38	<input type="checkbox"/> Recognition of project completion	<i>By city council, architect or engineer – may include public hearing minutes</i>
39	<input type="checkbox"/> Final change order	
40	<input type="checkbox"/> As-built drawings	
41	<input type="checkbox"/> Consent of Surety	
42	<input type="checkbox"/> Walk-through inspections	
43	<input type="checkbox"/> Previous monitoring findings/concerns	
44	<input type="checkbox"/> Monitoring Notification Letter	
45	<input type="checkbox"/> Monitoring Report Letter	
46	<input type="checkbox"/> Subrecipient Response to Monitoring Findings	
47	<input type="checkbox"/> Monitoring Risk Assessment	<i>Completed by the County project manager in the final closeout stage</i>



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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	Has the Subrecipient maintained a record of letters and correspondence with the County? <ul style="list-style-type: none"> ➢ Letter(s) informing the subrecipient of funding awards, written notices, etc. ➢ Letter(s) requesting amendments, with justification(s) (Optional, as needed) ➢ Authorization to incur costs
			7	Subrecipient Agreement amendments # _____ (Optional, as needed)
			8	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"> ➢ Provide written procedures
			8	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"> ➢ Provide written purchase and financial procedures/policies
			8	Does the Subrecipient maintain written procedures and policies for labor procurement? <ul style="list-style-type: none"> ➢ Provide written purchase and financial procedures/policies
			9	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:

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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
			10	Has the Environmental Review/NEPA been completed by County Staff? (§570.503(b)(5))
			11	Has the Subrecipient obtained the appropriate permits prior to the implementation of the activity? Permits (Coastal, Land Use, Building, Encroachment, Occupancy, Other) _____ _____ _____
			11	Has the Subrecipient retained the permit fee receipts?

PROCUREMENT

According to 2 CFR 200.318, subrecipients must maintain records to detail the significant history of a procurement. These records include files on the rationale for selecting the methods of procurement used, selection of contract type, the contractor selection/rejection process, and the basis for the cost or price of a contract. Small purchases may be used per 2 CFR 200.320, and whether the subrecipient followed its own procurement policies and procedures.

YES	NO	N/A	ITEM	SMALL PURCHASES
			12	Has the Subrecipient documented a description of the item being purchased (do not artificially divide the procurement to constitute a small purchase)?
			13	Has the Subrecipient documented a debarment check for each vendor? (Contractor/Subcontractor SAM check)
			12	Has the subrecipient obtained and documented price/rate quotations either by phone or in writing from a minimum of three sources?
			14	Has the subrecipient documented the basis for selection and cost of chosen vendor?
			15	Does the file contain a contract formalizing the scope of work, delivery schedule and the terms of compensation?

For procurement involving architecture or engineering (A/E) services, subrecipients may use competitive proposal procedures whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. Professional services are subject to 2 CFR 200.320 (d), and whether the subrecipient followed its own procurement policies and procedures.

YES	NO	N/A	ITEM	PROFESSIONAL SERVICES
			12	Does the file document the Request for Proposal (RFP) for Design Professional Services?
			12	Has the subrecipient documented affidavits of publication for the RFP or newspaper notice clipping (minimum 10 days allowed for response)?

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			12	Has the subrecipient provided a certified copy of the RFP evaluation?
			13	Did the subrecipient document the contractor / subcontractors debarment SAM checks?
			14	Did the subrecipient document the Notice of Award to contractor/subcontractors?
			15	Does the file contain the executed Architect/Engineer contract with CDBG language and any related addenda, etc.?

2 CFR 200.320(c) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price

YES	NO	N/A	ITEM	COMPETITIVE SEALED BIDS
			12	Has the subrecipient provided affidavit of publication and/newspaper notice clipping of the invitation/notice for bids?
			12	Has the subrecipient documented the solicitation list and correspondence with contractors?
			12	Does the file document the bid packet with the Applicable Federal Wage Decision
			12	Were the minutes of pre-bid conference recorded in the file?
				Did the subrecipient record the bid tabulation sheet(s)?
			13	Has the subrecipient documented the Contractor/Subcontractor SAM debarment checks?
			14	Did the subrecipient record the staff report and minutes of the Council/Board meeting when the award was made?
			14	Does the file document the notice of award to contractor/subcontractor?
			15	Does the file contain a copy of the fully executed contract/bid documents for the Prime Contractor and subcontractors, any related addenda, change orders, etc? ➤
			19	Do the contracts/subcontracts contain the required bonds (§ 200.325 Bonding requirements - Labor and Material Payment Bond with associated power of attorney and Performance Bond with associated power of attorney)? ➤ Proof of Insurance ➤ Certifications & Licences ➤
			17	Does the file contain documentation from the Pre-Construction Meeting? ➤ Acknowledgement/Sign in Sheet ➤ Agenda
			12	Does the file contain the wage decision lock in date form?
			22	Did the subrecipient document the notice to proceed from the County?
			23	Does the file contain a copy of final project plans/specs?

§ 200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms. Subrecipients must ensure that HUD-funded jobs, training, and contracts are provided to small and minority firms and women's business enterprise (MBE/WBE), following the affirmative steps described in § 200.321(b). The WBE/WBE applies to CDBG funded construction project specifically to contractors or subcontractors who are paid

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\$10,000 or more in CDBG funds. The County submits annual MBE/WBE report to HUD. The Subrecipient must collect MBE/WBE data and forward it to the County.

YES	NO	N/A	ITEM	MINORITY AND WOMEN OWNED BUSINESS ENTERPRISES (MBE/WBE)
			24	Has the Subrecipient maintained a solicitation list of qualified small, minority, and women owned business enterprises?
			24	Has the Subrecipient shown that they have solicited the businesses on the list when appropriate?
			24	Has the Subrecipient completed the MBE/WBE forms?
			24	Was the MBE/WBE language included with the project contracts?

§ 570.607 Employment and contracting opportunities. (b) Section 3 of the Housing and Urban Development Act of 1968. Subrecipients must ensure that HUD-funded jobs, training, and contracts are provided to local low-income residents, particularly those that reside in public housing and businesses that substantially employ them. Section 3 applies to construction project funded with more than \$200,000 of CDBG funds. It also applies to contractors and subcontractor who are paid \$100,000 in CDBG funds.

YES	NO	N/A	ITEM	SECTION 3
			25	If applicable, has the Subrecipient completed the HUD – 60002 Form?
			25	If applicable, has the Subrecipient submitted the Section 3 Contractor Certification Form?
			25	If applicable, has the Subrecipient submitted the Section 3 New Hire Certification Form?

§ 570.506 Records to be maintained. Subrecipients shall maintain individual client files for each client served by the CDBG funded activity.

YES	NO	N/A	ITEM	CLIENT PROFILE
			26	Does the Subrecipient implement an intake system to track clients and services provided? <ul style="list-style-type: none"> ➤ Provide sample intake form
			26	Does the Subrecipient record accurate household information? i.e. size, income, head of household
			26	Has the Subrecipient collected racial and ethnic characteristics of each client?

YES	NO	N/A	ITEM	CLIENT INCOME ELIGIBILITY DOCUMENTATION
			26	What is the target population for this project? (Low/mod, or Limited Clientele?) <hr/> 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)?
			26	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))
			26	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))

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			26	Has the Subrecipient documented at least 51% of persons benefiting from the activity are of low or moderate income? (§ 570.208(a))
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YES	NO	N/A	ITEM	L/M AREA BENEFIT
			26	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?
			26	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:

ACTIVITY IMPLEMENTATION

§ 570.201 Basic eligible activities.

YES	NO	N/A	ITEM	LAND ACQUISITION
			27	Does the file contain the title report?
			27	Does the file contain the purchase agreement?
			27	Does the file contain a copy of the property acquisition notice?

§ 570.606 Displacement, relocation, acquisition, and replacement of housing.

YES	NO	N/A	ITEM	DISPLACEMENT
			28	Have the appropriate steps been taken and documented to avoid displacement of persons as a result of the activity? (§570.606)
			28	Does the file contain a Relocation Plan?

24 CFR 570.608 Lead Based Paint.

24 CFR 8.22 & 8.23 & 24 CFR 570.614 Section 504 This applies to rehab projects having 15 or more units and the cost of the rehab is 75% or more of the replacement cost of the completed facility (See 24 CFR 8.23(a)). Section 504 also applies to new construction projects with five or more units (See 24 CFR 8.22 and 24 CFR 8.3 – Definition: Multi-Family Housing).

YES	NO	N/A	ITEM	CONSTRUCTION
			29	Have the daily reports from the Site Manager been documented?
			29	Have any change orders been documented?
			29	If lead paint is present on the project site (structures built prior to 1978), has the subrecipient documented the appropriate practices have been employed? (570.608)
			29	Has at least 5% of the total number of units been made accessible to persons with mobility disabilities?
			29	Has at least 2% of the total number of units been made accessible to persons with hearing or visual disabilities?

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LABOR STANDARDS FOR CONSTRUCTION

The Davis-Bacon Act and Related Act (DBRA) require payment of prevailing wages on federally funded or assisted construction projects. The Davis-Bacon Act applies to each federal government contract in excess of \$2,000 for the construction, alteration, or repair of public buildings or public works. Many federal laws that authorize federal assistance for construction through grants are Davis-Bacon "related Acts." Related Acts include, but are not limited to, the Copeland "Anti-Kickback" Act, and the Fair Labor Standards Act, for example.

YES	NO	N/A	ITEM	DAVIS BACON AND RELATED ACTS
			30	Who was responsible for ensuring Labor Standards compliance by the subrecipient? _____
			30	Was the Construction Project Handbook included with the bid packet?
			30	Does the file contain Photo Documentation of posters, wage decisions, and HUD form 4010?
			30	Does the file contain the weekly certified payrolls?
			30	Federal Wage Decision # _____, which was in effect
			30	Number of labor interviews with employees (#) _____

YES	NO	N/A	ITEM	POSTERS (available in Spanish as needed)
			35	Has the Subrecipient documented the presence of the required posters on the construction site? (Listed below)
				Contractors Minimum Wage
				Employee Polygraph Protection
				Equal Employment Opportunity
				Fair Housing
				Minimum Wage
				OSHA Job Safety
				Employee Rights Under the Davis Bacon Act
				Employee Rights on Government Contracts
				Employee Rights Under the National Labor Relations Act
				Applicable Federal Wage Decision
				HUD 4010

2 CFR 200.302 Financial Management.; 24 CFR 570.509 Grant closeout procedures.

24 CFR 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. Such documentation must include, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity. Grantee records pertaining to obligations, expenditures, and drawdowns must be able to relate financial transactions to either a specific origin year grant or to program income received during a specific program year.

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YES	NO	N/A	ITEM	FINANCIAL RECORDS
				Does the file contain a ledger of eligible expenses?
				Were eligible expenses recorded with appropriate source documentation, time records (staff admin) and materials (copies of invoices)?
				Has the Subrecipient retained all financial records, supporting documents, statistical records, and all other records pertinent to the subrecipient agreement and Federal regulations?
				Does the file contain the record of weekly certified payrolls?
				Does the file contain a record of submitted Requests for Payment(s)?
				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)

YES	NO	N/A	ITEM	PROGRESS REPORTS
				Have the permits been approved and signed off?
				Has the Subrecipient provided the quarterly Progress Reports? <ul style="list-style-type: none"> ➤ 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: _____
				Was a Final Completion Report completed?
				Does the file contain photo documentation of the project before, during and after construction?

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

POST ACTIVITY / MONITORING

24 CFR 570.509 Grant closeout procedures.

YES	NO	N/A	ITEM	PROJECT CLOSEOUT & MONITORING
			36	Has the Subrecipient provided a single audit?
			37	Have any liens been released?
			38	Has the appropriate body acknowledged the completion of the project? <ul style="list-style-type: none"> ➤ Provide public hearing minutes or other documentation
			39	Is there a final change order with tabulation of over runs and under runs?
			40	Is there a copy of record (as-built) drawings?
			38	For public works projects, are the Final Closeout Public Hearing w/minutes from the City/County provided?
			41	Was a written Consent of Surety, if any, provided for final payment?

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			42	Have walk-through inspections been recorded?
			43	Have any outstanding findings or concerns from previous monitoring process been addressed?
			43	Have any outstanding findings or concerns from the current monitoring process been addressed?
			44	Monitoring Notification Letter
			45	Monitoring Report Letter
			46	Has the Subrecipient appropriately documented their response to the monitoring findings?
			47	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: