



# CDBG-DR COMPLIANCE AND MONITORING GUIDE

Bay County, Florida

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## **I. Introduction**

The Bay County Department of Public Works and the Collaborative Housing Department ("Grants Staff") are the entities charged with administering all Department of Housing and Urban Development's Community Development Block Grant- Disaster Recovery (CDBG-DR) Infrastructure and Housing funds on behalf of the Bay County Government. CDBG-DR grants as authorized by the United States Congress and the President of the United States under supplemental appropriation laws. Specific requirements are typically included in the appropriation law adopted to cover a specific disaster.

Grant Staff is responsible for ensuring that all projects and programs are administered efficiently, effectively, and in accordance with all applicable rules and regulations. Staff will work in conjunction with other County Departments, and will competitively procure additional services, such as architects, project management staff augmentation or construction engineering inspection service augmentation, or other services on an as needed basis.

This Compliance and Monitoring Guide has been designed to assist County Staff in the monitoring of disaster recovery grants and is to be used for internal monitoring purposes. For purposes of this handbook Bay County will be monitoring itself as the sub-recipient. The guide provides information regarding the general CDBG-DR monitoring process. It is the responsibility of every grant recipient to ensure that all federal rules and regulations are complied with by each grantee. Grantees must also carry out proper and efficient grant administrative practices. This guide will serve as a tool for those monitoring CDBG-DR programs implemented by the County, contractors, and sub-recipients.

## **II. Overview of Monitoring Objectives**

Monitoring is an integral management control technique and is required of all CDBG grantees. It is an ongoing process that assesses the quality of a program participant's performance over a period of time. Monitoring provides information about programs that is critical in making informed judgments about program effectiveness and management efficiency. It also helps in identifying instances of fraud, waste and abuse. The following objectives are accomplished through the monitoring process:

- To determine if a grantee/subrecipient is carrying out its CDBG-DR program and its individual activities as described in the Action Plan, as intended;
- To determine if a grantee/subrecipient is carrying out its activities in a timely manner and in accordance with the schedule included in the contractual agreement;
- To determine if a grantee/subrecipient is incurring only eligible costs;
- To determine if a grantee/subrecipient is conducting its activities with adequate control over program and financial performance and in a way that minimizes opportunities for waste, mismanagement, fraud and abuse;
- To assess if the grantee/subrecipient has a continuing capacity to carry out the approved project, as well as future grants for which it may apply;
- To identify potential problem areas and to assist the grantee/subrecipients in complying with applicable laws and regulations;
- To assist grantee/sub-recipients in resolving compliance problems through discussion, negotiation, and the provision of Technical Assistance and training;
- To provide adequate follow-up measures to ensure that performance and compliance deficiencies are corrected by grantee/subrecipients and not repeated;

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- To comply with the Federal monitoring requirements of 24 CFR 570.501(b) and with 24 CFR 84.51 and 85.40, as applicable;
- To determine if any conflicts of interest exist in the operation of the CDBG-DR program, per 24 CFR 570.611; and
- To ensure that required records are maintained to demonstrate compliance with applicable regulations.

### III. Roles and Responsibilities

Project Manager: Responsible for oversight of all compliance and monitoring activities; signs all relevant letters (e.g. onsite visit strategy letter and monitoring report letter); issues final decisions regarding findings and concerns, if applicable.

Assistant Project Manager - CDBG-DR Project Manager: Responsible for directing the day-to-day activities related to compliance and monitoring, including the completion and maintenance of the risk assessment and monitoring schedule, ensuring the compliance and monitoring staff are prepared for and are effectively carrying out all tasks.

Admin Assistant: Responsible for completing desk monitoring and provide technical assistance when needed; drafting all relevant letters; completing monitoring checklists; and document management.

Finance Department: Responsible for ensuring that all costs incurred meet applicable local, state, and federal regulations.

Purchasing Department: Responsible for ensuring that all applicable local, state, and federal regulations are followed in the procurement of goods and services.

Legal Department: Responsible for drafting and reviewing all agreements, contracts, and subcontracts for adherence to applicable rules and regulations and reviewing findings and concerns resulting from compliance and monitoring activities to determine if legal action is required.

Outside Internal Auditor Firm: Responsible for evaluating and identifying opportunities to improve the effectiveness of Bay County's governance, risk management and control processes over CDBG-DR grants. Ensures compliance with all applicable federal regulations associated with the grant. The outside firm is also responsible for evaluating the monitoring standards and procedures that ensure program compliance, including duplication of benefits. Finally, the outside firm evaluates general grant management procedures, key grant management functions, program operations, record keeping and documentation, program and project progress and grantee goals.

### IV. Risk Assessment

Consistent with HUD requirements detailed in the CPD Monitoring Handbook (6509.2 Rev-6 and updated in CPD-14-04), the County will conduct a risk analysis on all entities being

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monitored (including all programs, contractors and sub-recipients), in order to identify those entities and programs that are most susceptible to fraud, abuse, or mismanagement.

The risk analysis provides critical information to effectively target resources toward entities and programs that pose the greatest risk to the integrity of Bay County CDBG-DR funding, including identification of the program areas to be covered, and the depth of the review. The selection process results in identifying projects, contractors and activities that represent the greatest vulnerability to fraud, waste, abuse, and mismanagement. This assessment will allow the County to minimize potential risk as it administers its CDBG-DR allocation.

Bay County will make necessary adjustments in preparing the monitoring strategies and revising them based on new information, such as declining or improvement in participant performance, budget constraints, reprogramming of resources or other unanticipated events.

### 1. Bay County CDBG-DR Risk Assessment Sample

Criteria	Description	High Risk	Medium Risk	Low Risk
<b>Funding</b>	Total Funds allocated to the Project (including FEMA and other federal and State funds)	10	5	2
		Over \$1,000,000	\$500,000-\$1,000,000	\$500,000 and below
<b>Complexity</b>	The multiple types of resources and activities associated with the project	10	5	2
		Construction Projects	Demolition only; Loan or Grant Program	Single source funded projects. Buyouts with/without Construction or Design Only
<b>Implementation Method</b>	The use of sub-recipients, vendors, or internal staff to carry out the programs/project	10	5	2
		Sub-recipient	Grantee Staff with contractor Program Management	Contractor
<b>Relevant Experience</b>	The experience of grantee/sub-recipient/contractor administering CDBG funds.	10	5	2
		No Experience	1-3 years of experience	4+ years of experience
		10	5	2



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<b>Compliance History</b>	The grantee's past compliance with federally funded programs.	Past monitoring visits revealed severe deficiencies; or no evidence of any prior monitoring	Evidence of prior monitoring; deficiencies noted, but none severe	Evidence of prior monitoring; no deficiencies noted
<b>Project Timeline</b>	The projected and defined timeline for project completion, per the agreement.	10	5	2
		30+ months	24-30 months	Under 24 months

**High Risk:** 60 – 46 Points **Medium Risk:** 45 - 30 Points **Low Risk:** Less than 30 Points

### V. County Anti-Fraud, Waste and Abuse (AFWA) Procedure

Bay County has established procedures to prevent fraud, waste and abuse of funds. These procedures are designed to identify discrepancies and risks in the information provided by third parties. Such discrepancies and risks may be indicative of fraud, waste, and abuse. By implementing these checks, the County can verify the accuracy of information provided by program applicants, vendors, and sub-recipients. These checks are conducted systematically, utilizing standardized research methodologies, which flag identification processes for consistency and equitable treatment across relevant sources. Flag codes, notations, and relevant supporting documents are all checked for errors by County Staff.

#### 1. Program Applicants

Bay County will aggressively investigate all allegations of misconduct, fraud, waste or abuse regarding eligibility and the disbursement of award amounts to applicants in Housing Programs. With the assistance of our grant management contractor, processes have been developed to ensure applicant information is verified and systems are in place to detect and prevent fraud, waste and abuse. All suspected cases of fraud, waste or abuse shall be referred to the HUD Office of Inspector General Hotline at 800-347-3735, 800-877-8339 TTY/ASCII or by submitting a report online at [www.hudoig.gov/hotline](http://www.hudoig.gov/hotline).

#### 2. Vendors

In addition to verifying the accuracy of information provided by program applicants, Bay County verifies the accuracy of information provided by its vendors. As part of Bay County's procurement process, the Purchasing Department checks the following: Sunbiz to ensure an entity is eligible to conduct business in Florida; For federal jobs Sam.gov is checked to ensure vendors don't have any exclusions; and dms.myflorida website is checked for the following lists: convicted vendor list; discriminatory vendor list; suspended vendor list; anti-trust violator vendor list and scrutinized list of prohibited companies.



Prior to contract execution, Bay County's procedures include, but are not limited to, reviewing debarment lists, searching known databases for information (for example: State of Florida tax liens and incorporation documents), conducting internet research, and obtaining information available from State and Federal agencies, such as substantiated investigative findings and audit reports. Bay County has established regular channels of communication with other State and local Government agencies who are contracting with various entities for services relating to storm recovery efforts in order to be on guard for issues relating to contractor fraud, waste, and abuse. Findings are reported to Bay County's purchasing staff.

### 3. Sub-recipients

As it does with its vendors, Bay County reviews debarment lists, Sam.gov and known databases, conducts internet research, and obtains information available from State and Federal agencies, prior to executing agreements with sub-recipients. Findings are reported to Bay County's procurement staff.

### 4. County Policies and Personnel

Bay County follows a comprehensive fraud, waste and abuse prevention program, which consists of integrity monitoring, internal controls assessments, and investigations in order to create a series of "check and balances" to mitigate risks and ensure compliance with Federal and State regulations. These actions are directed and managed by the all County Departments not limited to but including the Departments of Public Works, Purchasing, Finance, Budget and Legal.

Effective coordination between all Bay County departments and personnel enables all programs, vendors administering Bay County programs, departments, and sub-recipients to comply with applicable State and federal regulations, prevent and minimize fraud, waste and abuse.

The Department of Public Works, in conjunction with Purchasing, Finance, Budget and Legal, perform the following tasks: 1) gauge the overall progress and effectiveness of project implementation; 2) identify issues that may compromise program integrity, fund, and service delivery; 3) work with program and operational staff to implement corrective action and resolutions; 4) oversee the implementation of Bay County's recapture process, if applicable; 5) provide information and input on how Bay County's programs and practices can be improved and enhanced to improve performance, efficiency, and curtail waste, fraud, and abuse; and 6) serve as a layer of oversight to mitigate any potential risks, proactively detect and investigate potential fraud, and identify areas in which to strengthen program capacity and the quality of service delivery.

### 5. Internal Audit

Bay County's monitoring program is supported by an outside audit firm, which provides internal audit coverage for Bay County and, as such, serves as Bay County's internal auditor with independent oversight over Bay County's grants management practices and program operations.



This outside firm will report directly to the CFO's Office, effectively maintaining independence from the departments being reviewed. The outside firm, along with regular monitoring performed by all County Departments not limited to but including the Departments of Public Works, Purchasing, Finance, Budget, and Legal, help to detect instances of fraud, waste or abuse.

## **VI. Monitoring**

### **1. Entities to be Monitored**

#### ***a. Contractors/Vendors***

Contractors/Vendors are entities competitively selected to provide clearly-specified goods or services and the contract price is established through the procurement process. CDBG-DR funds are paid to the contractor as compensation for the satisfactory provision of the goods and services as specified in the contract. The procurement process provides for the initial review of contractors/vendors as they are required to submit such documentation as part of the bid document and qualifications submission.

However, other than rules relating to bonding, insurance, prevailing wages and other such provisions, most of the standard federal administrative and monitoring requirements (described in 24 CFR Parts 84 and 85, as applicable) including, but not limited to program income, financial management, allowable costs, record retention, and conflict of interest do not apply to contractors, once the procurement process is complete.



***b. Subrecipients***

Subrecipients can be Governmental Agencies, Private Non – Profits, Private For-Profits (under the provisions of 24 CFR 570.201 (o), Community Based Development Organizations (CBDOs) who are selected by the grantee to carry out agreed upon eligible activities on behalf of the grantee. Because subrecipients are acting on behalf of the grantee, all administrative requirements which are required of the grantee are transferred to the sub-recipient, causing the administrative and monitoring requirements to be greater for sub-recipients.

***c. A. Grantee Implemented Programs***

The grantee may also choose to implement programs directly. In these circumstances, the grantee’s monitoring and compliance department must monitor these programs to ensure that the program is operating in a compliant manner according to all CDBG-DR requirements, federal, state and local laws. To supplement, the outside audit firm monitors the grantee, to ensure compliance with CDBG-DR requirements.

**2. Areas to be Monitored**

***a. Program Review***

Program Review focuses on the review of specific program activities. Program staff is asked to define the program and the monitoring staff should review CDBG-DR eligibility, national objective compliance, and duplication of benefits. Program monitoring should ensure that the program is following all of their written policies and procedures. A review of the overall management of the program is also appropriate in this category. The Florida Department of Commerce has confirmed they will determine the national objective compliance for the Community Development Block Grant-Disaster Recovery (CDBG-DR) projects and confirm them with the County.

***b. Financial Review***

Financial Review focuses on making the connection between the program budget, expenditures and actual beneficiaries assisted, reviewing payroll documents for the period applicants are reported, determining eligibility of applicants based on income documentation in client files (for housing projects), the general relationship between the contents of the client files and benefit data reported by the sub-recipient on the same applicants.

***c. Program Applicant Files***

When applicable, program applicant files should be reviewed through the formal monitoring process. This is different than regular Quality Assurance /Quality Control



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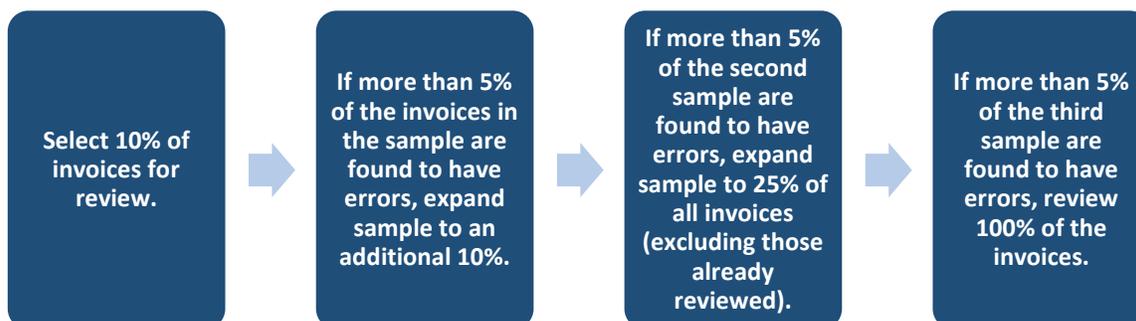
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process (QA/QC) which should be a regular part of the programmatic procedures. When completing a monitoring of program applicant files, the monitoring staff should randomly select a sample set of review and normally a set that focus on and reflects approximately 10% of the total applicants served in the program or more if there appears to be any systemic issues to address.

#### *d. Invoices*

A sample of submitted invoices are randomly selected for review and traced back from CDBG-DR reimbursements to the original organization's expenditure and client(s) assisted (if appropriate). For example, tracking if exact dollars billed for service by a subcontractor can be traced directly to one contractor. Conversely, a different review model is required when dollars billed provided services and materials from multiple subcontractors on different job sites. It is expected that the monitoring staff would review original invoices, cancelled checks, and other documentation evidencing the dollar expenditure, the relationship to the CDBG-DR program objective, the appropriate proportion of CDBG-DR expenditure in comparison to other funding included in the project budget, and accounting receipt of the federal grant funds.

#### *e. Sampling methodology:*



#### *f. Outside Audit Firm's Role*

The outside audit firm procured by the County selects a sample of expenditures charged to the grant and determines whether each expenditure:

- Is allowable under the terms of the grant;
- Is properly procured;
- Is supported by sufficient and appropriate documentation;
- Was incurred within the grant period;
- Was approved by the appropriate level of management;
- Vendors were paid in a timely manner; and
- The items delivered and paid for are consistent with the purchase order and/or contract for the goods or services.



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#### 3. Checklists to be Utilized

##### a. *Core Checklist*

The Core Checklist should be used to determine if the subrecipient's 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, civil rights, and fair housing compliance. The Core Checklist is included as Exhibit A to this manual.

##### b. *Project Checklist*

The Project Checklist, included as Exhibit B, should be used to review 100% of projects at least once prior to closeout. It should also be used to review a sample of the sub-recipient's projects. The project checklist can be used as both a desk reference and an onsite checklist. Since the activities associated with a project and with a contract vary, all sections of the Project Checklist may not be applicable for each project and associated contract/contractor or sub-recipient.

The Project Checklist is comprised of questions related to each the following compliance areas: citizen participation; financial management; procurement; contracting; labor; civil rights; environmental review; acquisition and relocation; property management; monitoring; lead-based paint, asbestos, and mold; and national objective and eligible activities.

##### c. *Monitoring Schedule*

All program areas should be monitored at least once before program closeout by the Florida Department of Commerce State Monitoring Team. An internal monitoring schedule is based on the risk assessment score outlined in the sample assessment provided in this Monitoring and Compliance guide. If a project is High Risk it shall be monitored internally for Financial and Davis Bacon compliance at least annually and overall programmatic requirements at least once before program closeout. If it is medium or low risk it should be monitored at least once before program closeout. The Risk Assessment for each project outlines which projects should be monitored and how often.

#### 4. Types of Monitoring

##### a. *Desk Review*

Bay County conducts a internal desk review of the contractors/vendors on its CDBG-DR projects as determined by the risk assessment. The goal of the Desk review is to ensure proper management of the program or provide clarification to a specific unknown that cannot be determined from the contractor/vendor reports and to identify areas of technical assistance needed.



***b. Vendors/Contractors***

During the Desk Review, contract terms and conditions are reviewed by the CDBG-DR Project Manager. Contractors and vendors are required to submit as part of their initial response and review such documents as:

- Copies of Insurance documentations, i.e., liability and professional liability;
- Copies of Bonding documentation;
- Section 3 Plan;
- E-Verify
- Any other documentation requested by County Staff

Additionally, the desk review can be used to review reports documenting progress on the overall project as well as more specific reports on program components such as Section 3, Davis-Bacon and EEO which are submitted to the grantee.

***c. Grantee Implemented Programs***

During a desk review, the CDBG-DR Project Manager can review the status of grant agreements and assess if there are areas where the program needs additional assistance. Additionally, if there are other areas in the program which need assistance, the Project Manager should review those as well.

- Sub-recipients Programmatic Policies and Procedures
- Sub-recipients accounting system and documentation of financial transactions;
- Previous invoices submitted to the grantee
- Procurement policies and procedures Reporting processes;
- Grant/sub-recipient agreement terms;
- Reporting and supporting documents such as insurance, certifications and other documentation required by the grantee.
- Program Policies and Procedures
- Program Quarterly reports

***d. Technical Assistance***

If needed, the County, may also periodically conduct Technical Assistance (TA) sessions with sub-recipients, contractors/vendors, and/or direct beneficiaries to enable them to understand expectations for program compliance , Section 3 Training and Davis Bacon Compliance. The County may provide technical assistance throughout the life of a CDBG-DR grant on numerous topics as it relates to the implementation of CDBG DR funded projects. Technical Assistance can come in numerous different forms such as:

- Verbal or written advice;
- Formal training; and/or,
- Documentation and guidance



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Very commonly, Technical Assistance can be for new contractors/vendors, to introduce them to the requirements of CDBG-DR. However Technical Assistance can also include other more technical areas, which are tailored to one specific program, sub-recipient or contractor/vendor or to all entities who have a role in administering the CDBG-DR dollars.

As part of Technical Assistance visits, County staff and/or designees will answer any questions and provide guidance on the monitoring and compliance process. Grantees should visit the risk assessment and monitoring checklist to determine if Technical Assistance is needed in a program or by a vendor/contractor, or grantee.

Areas commonly covered through Technical Assistance:

- Program Eligibility Criteria
- CDBG-DR requirements including but not limited to
  - CDBG-DR eligible activities
  - CDBG-DR national objectives
- Financial Management Requirements and timely expenditure of funds
- Labor Requirements ( Davis Bacon)
- Section 3 Requirements
- Environmental Review Requirements
- FHEO (LEP, Equal Employment Opportunities, Fair Housing, ADA, Section 3, Section 504)
- Monitoring and Compliance
- Recordkeeping
- Closeout



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The Public Works Department Project Manager and/or his designee will conduct an internal monitoring using the attached checklists to review all documents for completeness and accuracy to define the scope and focus of monitoring efforts. If any deficiencies are determined a plan of action will be made to address them. If the County is monitoring an outside contractor/vendor, the County will use the following criteria to define the scope and focus on monitoring efforts. Identification of the following occurs:

- The programs/areas/functions to be reviewed;
- Data or information to be submitted by the contractor/vendor prior to monitoring (if any);
- The names of any participant staff members who will need to be consulted during the monitoring;
- Anticipated staff who will conduct the monitoring;
- Clearly defined areas of responsibilities for each reviewer (to avoid duplication) if more than one staff person will be conducting the monitoring;
- A schedule for carrying out the monitoring tasks and the anticipated time frames; and
- Required resources.

In preparation for a monitoring visit, the Bay County Public Works Department Chief Infrastructure Officer or his designee should request relevant contracts, agreements, policies and procedures from the contractor/vendor to be monitored, including documents pertaining to financial management, procurement, contracting, Section 3, E-Verify and Davis Bacon compliance. To the greatest extent feasible, these documents should be reviewed prior to the monitoring. The Core Checklist is to be completed in concurrence with the review of the aforementioned documents.

## 6. Performing a Review

*a.* The purpose of the entrance conference is to:

- Explain how the training/monitoring will be conducted;
- Identify/confirm key entity staff that will assist during the monitoring;
- Set up or confirm meeting or interview times (including any staff or personnel who may be interviewed) and, if applicable, schedule physical inspections; and
- Verify the programs/activities to be reviewed and, if on-site, how access to files and work areas will be granted (some programs files can be sensitive; some work areas can be hazardous).

*b. Monitoring Process*

Based on the areas outlined in the monitoring strategy, Bay County staff will utilize documents which the County has created based off of HUD Monitoring Checklists (see attached) for the area being monitored. In general, the monitoring processes seeks to answer the following questions:



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- Is the program purpose being accomplished?
- Are the program beneficiaries being served as intended?
- Are program requirements being met?
- Is the program adhering to federal CDBG-DR, state and local requirements?
- Do the program files document all of the program pieces from award to closeout

Throughout the monitoring, Bay County staff will maintain an ongoing dialogue with the contractor/vendor being monitored. Such communication keeps the entity informed as to how the monitoring is progressing, enables discussions of any problem areas encountered and provides the entity an opportunity to make “on-the-spot” adjustments or corrections or present additional information to help the Bay County staff responsible for monitoring. It also minimizes the potential for surprises to the entity when the exit conference is held as well as when the monitoring results are formally communicated in writing.

Best practices for monitoring suggest a random sampling of 10-15% of program files (if there are applicant or multiple projects in one program) for each program activity being monitored. If financial files or invoices are being monitored, then a similar sample maybe sampled.

For non-random samples, Bay County monitoring staff shall give consideration to the areas outlined in the monitoring strategy as well as unresolved problems remaining from previous monitoring, any new types of activities being undertaken and/or the extent of any activities considered high risk. Any sample review or spot-check of the entity records that raises questions concerning the accuracy of the data indicates the need for further follow-up.

- Significant achievements were made;
- Specific concerns need to be brought to the entity's attention;
- Technical assistance was provided or is needed; and/or
- Findings will require corrective actions.

A deficiency in program performance not based on a statutory, regulatory or other program requirement. Sanctions or corrective actions are not authorized for concerns. However, Bay County should bring the concern to the program’s attention and, if appropriate, may *recommend* (but cannot require) actions to address concerns and/or provide technical assistance.

A deficiency in program performance not based on a statutory, regulatory or other program requirement. Sanctions or corrective actions are not authorized for concerns. However, Bay County should bring the concern to the program’s attention and, if appropriate, may *recommend* (but cannot require) actions to address concerns and/or provide technical assistance.



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#### *c. Finding*

A deficiency in program performance based on a statutory, regulatory or program requirement for which sanctions or other corrective actions are authorized. Where an identified deficiency results in a finding, the finding must include the **condition, criteria, cause, effect, and required corrective** action.

- The **condition** describes what was wrong or what the problem was.
- The **criteria** cite the regulatory or statutory requirements that were not met.
- The **cause** explains why the condition occurred.
- The **effect** describes what happened because of the condition.
- The **corrective action** identifies the action(s) needed to resolve the problem and, unless inapplicable or there are extenuating circumstances, should include the time frame by which the participant is to respond to the finding

#### *d. Contents of Monitoring Report*

Each Monitoring Report is to include:

- The program, project or entity monitored;
- The dates of the monitoring;
- The name(s) and title(s) of the Bay County staff that performed the monitoring review;
- A listing of the program/project/activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant);
- If applicable, a brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area);
- Monitoring conclusions;
- If applicable, clearly labeled findings and concerns;
- If there are findings, an opportunity for the sub-recipient and/or contractor/vendor to demonstrate, within a time prescribed by Bay County, that the sub-recipient and/or contractor/vendor has, in fact, complied with the requirements;
- Response time frames, if needed;
- An offer of Technical Assistance, if needed or a description of Technical Assistance provided during the monitoring.



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Generally, the tone of the monitoring letter is positive, in recognition of the common goal to responsibly and effectively implement Bay County's recovery programs. Significant accomplishments or positive changes are included to establish and maintain constructive relationships and to recognize the dedication and commitment of the sub-recipient and/or contractor/vendor staff to the program missions.

Rather than broad, general statements, conclusions dictated in the monitoring letter must be specific and defensible. For example, a statement such as the sub-recipient and/or contractor/vendor "complied with all applicable rules and regulations" is too vague. Rather, because monitoring reviews cover selected program or technical areas, a more suitable statement is "based upon the materials reviewed and the staff interviewed, the activity/area was found to be in compliance with (specify requirements)."

#### **e. Monitoring Response**

Once the subrecipient and/or contractor/vendor has received the Monitoring Report, the entity will have 30 days to respond to Bay County. Through this response, the sub-recipient and/or contractor/vendor can provide responses to the findings and concerns and can note to Bay County how they are implementing any corrective action which is recommended in the Report.

#### **f. Monitoring Follow Up**

Once a response is submitted by the sub-recipient or vendor/contractor, then it will be the Bay County's responsibility to then continue dialogue and follow up to ensure that the items which are closed or where corrective action is being implemented. Continued conversation and correspondence via e-mail, letter or verbal conversations will continue to allow Bay County to work with their sub-recipients and vendors/contractors to ensure that programs continue to be compliant



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*Exhibit A*  
*Compliance Monitoring Core Checklist Template*

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## Compliance Monitoring Core Checklist Template

### 1. Instructions and Monitoring Prep

This Checklist is used internally to review the County's programmatic and financial CDBG-DR systems and will also be used as a monitoring tool to determine if the Sub-recipient'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 Sub-recipient level. This Checklist should also be used to review the Sub-recipient's financial management system, management practices, Davis-Bacon compliance and other federal compliance.

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

The Project Monitoring Checklist will be used for internal use for the County's CDBG-DR projects to highlight any deficiencies within any administrative systems that are not covered in the Core Checklist.

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.



# Bay County Florida

## Compliance Monitoring Core Checklist Template

**Subrecipient :**

**Monitor:**

**Date Completed:**

1.1 Monitoring Preparation		
Requirements	Response	Comments
<b>Description:</b> 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 complete all monitoring requirements as contained in the 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No	



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## Compliance Monitoring Core Checklist Template

**Subrecipient :**

**Monitor:**

**Date Completed:**

1.3 Documentation Collection			
Document	For Use in Section	Date Received (or N/A)	Comments
<p><b>Description:</b> This Section provides a list of documents required to answer the questions within this Checklist. Execute this Section prior to beginning the review.</p>			
1. Procurement Policies and Procedures			
2. Contracting Policies and Procedures			
3. Financial Management Policies and Procedures			
4. Monitoring Policies and Procedures			
5. Record Keeping Policies and Procedures (onsite only)			
6. Most Recent Draw Request/Request for Payment and supporting documentation			
7. Appropriate Audit/Financial Report			
7.1. An A-133 if the Subrecipient has expended more than \$500,000 in federal funds within a fiscal year			
7.2. Annual sworn financial statement if revenue received was \$50,000 or less			
7.3. Annual compilation if revenue received was more than \$50,000 but less than \$200,000			
7.4. An annual review along with the required agreed upon procedure report if revenue received was \$200,000 or more but less than \$500,000			
8 Evidence of the administration of a Fair Housing Activity			
9. 504 Self Evaluation			
10. Section 504 Assurance			



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<b>2.1 Procurement Policies and Procedures</b>			
<p><b>Description:</b> Execute this Section to determine if the Subrecipient is in compliance with applicable regulations.</p> <p><b>Regulations:</b> 24 CFR 84.44, 24 CFR 85.36, and 24 CFR 570.502</p>			
<p>1. Does the Subrecipient have procurement policies and procedures in place? [24 CFR 85.36; 24 CFR 84.44]</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	
<b>Procurement Policies and Procedures Requirements</b>			
<p>5. <u>Requirements</u> - Do the Procurement policies and procedures include a Code of Conduct? 24 CFR 85.36 and 84.42 requires the Code of Conduct to contain these minimum requirements:</p> <ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>Penalties, sanctions, or other disciplinary actions for violations are included</li> <li>The Code of Conduct is consistent with the Florida Code of Governmental Ethics (Florida Revised Statutes 42:1101)</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	



# Bay County Florida

## 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, 24CFR85.36(b)(9) requires:</p> <ul style="list-style-type: none"> <li>• Only one of the solicitation methods (Small Purchase, Sealed Bid/formal advertising, Competitive Proposals, Noncompetitive Proposals) are employed for each procurement</li> <li>• The requirements for the applicable solicitation method are followed</li> <li>• Only the appropriate contract types (Purchase Order, Fixed Price, Cost Reimbursement) are employed for each procurement</li> <li>• A “cost plus a percentage of cost” or a “percentage of construction cost” type pricing is not used for contracts [24 CFR 85.36 (f) (4)and 84.44(c)]</li> <li>• 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 [24 CFR 85.36 (b)(10)]</li> <li>• Contract is price appropriately, as determined by contract services (Lump sum pricing, unit pricing, or reimbursement of costs)</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<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 requires that cost reasonableness is reviewed:</p> <ul style="list-style-type: none"> <li>To avoid unnecessary purchases;</li> <li>To avoid duplicative purchases, and;</li> <li>Ensure costs are reasonable.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<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 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), 24CFR84.84(e)(2)]</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]</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)]</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); 24CFR84.43]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<b>2.2 Contract Administration Policies and Procedures</b>			
<p><b>Description:</b> 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><b>Regulation:</b> 24 CFR 85.36(b)(2), 24 CFR 84.47, 24 CFR 84.84(h)</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"> <li>Utilizing Contract Templates for developing contract;</li> <li>Identifying a contract administrator for each contract executed;</li> <li>Implementing a process to ensure contractor abides by the terms of the contract procedures;</li> <li>Implementing a deliverable review/approval process; and,</li> <li>Implementing a process for managing issues that may arise with the contractor.</li> </ul>	<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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## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
<b>Isaac Only</b>			
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			
<b>Description:</b> Use this Section to determine if the Grantee Recipient/Subrecipient's financial management policies and procedures meet the requisite standards. <b>Regulations:</b> 24 CFR 84.21, 24 CFR 85.20, 24 CFR 570.502			
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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
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?  <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	
3. Are the policies and procedures documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<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	
Financial Management Policy and Procedures Requirements			
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?  [24CFR85.20(b)(3) and 84.21(a)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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?  [24CFR85.20(b)(3) and 84.21(b)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. <u>Internal Controls Requirements</u> - Do the financial management policies and procedures include a process for approving and recording transactions?  [24CFR85.20(b)(3) and 84.21(b)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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?  [24CFR85.20(b)(4) and 84.21(b)(4)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

# Bay County Florida

## 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)]</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 OMB Circulars A-87 or A-122?</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)]</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"> <li>• Amount budgeted</li> <li>• Advances/reimbursements received to date</li> <li>• Program income &amp; other miscellaneous receipts</li> <li>• Actual expenditures/disbursements</li> <li>• Current encumbrances/obligations</li> <li>• Unpaid requests for payments</li> </ul> <p>[24CFR84.52 and 24CFR85.41]</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)]</p>	<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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## 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	
<b>2.4 Monitoring Policies and Procedures</b>			
<p><b>Description:</b> 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><b>Regulations:</b> 24 CFR 84.51; 24 CFR 85.40</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	



# Bay County Florida

## 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"> <li>• Prioritizing based on Risk</li> <li>• Prescribing a Sampling methodology</li> <li>• Monitoring Performance</li> <li>• Implementing a tracking system</li> <li>• Technical Assistance procedures</li> </ul>	<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"> <li>• Compliance with approved application scope, funding specifications, and other requirements</li> <li>• Program guidelines</li> <li>• Implementation schedule and milestones</li> </ul> <p>[24CFR84.51 and 24 CFR 85.40</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><b>Description:</b> Use this Section to determine if the Subrecipient’s Record Keeping Policies and Procedures are sufficient. <b>Regulations:</b> 24 CFR 85.40, 24 CFR 84.53, 24 CFR 570.506, and 24 CFR 570.490</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	
Recordkeeping Policies and Procedures			



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

2. Policies and Procedures Review			
Requirements	Response	Issue Type	Comments
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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
<b>3.1 Establishing DR CDBG Funds Account</b>			
<b>Description:</b> 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 FDEM/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	
<b>3.2 Financial Administration</b>			
<b>Description:</b> 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			
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	
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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
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><b>Description:</b> Use this Section to assure compliance with audit/reporting requirements.</p> <p><b>Regulations:</b> 24 CFR 84.26 and/or 24 CFR 85.26.</p>			
1. Has the Subrecipient conducted an A-133, if required?  An A-133 is required if the Subrecipient has expended more than \$500,000 in federal funds within a fiscal year. Obtain the nine digit EIN off of the W-9 and use <a href="http://harvester.census.gov/sac">harvester.census.gov/sac</a> to determine if the A-133 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 an A-133 is not required, has the Grantee/ Recipient/Subrecipient submitted the other appropriate financial report? <ul style="list-style-type: none"> <li>• Annual sworn financial statement if revenue received was \$50,000 or less</li> <li>• Annual compilation if revenue received was more than \$50,000 but less than \$200,000</li> <li>• Annual Review, plus agreed upon procedures if revenue received was \$200,000 or more but less than \$500,000</li> </ul>	<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><b>Description:</b> 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	
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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

3. Validation of Financial Management System			
Requirements	Response	Issue Type	Comments
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 FDEM/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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
<b>4.1 Section 504</b>			
<b>Description:</b> 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	
<b>4.2 Fair Housing</b>			
<b>Description:</b> 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		



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
<b>4.3 Title VI</b>			
<p><b>Description:</b> 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>			
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Have any complaints been received?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.1. If yes, have the complaints been resolved?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<b>4.4 Section 3</b>			
Requirement	Response	Issue	Comments
<p><b>Description:</b> 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"> <li>Residents of Public and Indian Housing, or</li> <li>Individuals that reside in the metropolitan area or nonmetropolitan County 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.</li> </ul> <p><i>Section 3 Business Concerns are One of the Following:</i></p> <ul style="list-style-type: none"> <li>Businesses that are 51 percent or more owned by Section 3 residents;</li> <li>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</li> <li>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.</li> </ul>			
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>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Subrecipient :

Monitor:

Date Completed:

4. Civil Rights			
Requirements	Response	Issue Type	Comments
<p>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?</p> <p>[24CFR 135.32 (a)]</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. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how Section 3 <b>business concerns</b> are to be notified about contracting (or subcontracting) opportunities generated by the program participant or its contractors involving covered financial assistance?</p> <p>[24 CFR 135.32 (a)]</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>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?</p> <p>[24 CFR 135.32(b) and 24 CFR 135.32(f)]</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>5. Does the Subrecipient have written procedures (i.e., "Section 3 Plan") governing how compliance with the requirements of Section 3 will be monitored?</p> <p>[24 CFR 135.32(d) and 24 CFR 135.32(f)]</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>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?</p> <p>[24 CFR 135.32(c)]</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	



# Bay County Florida

## Compliance Monitoring Core Checklist Template

Grantee/ Recipient/ Subrecipient :

Monitor:

Date Completed:

5. File Review – ONSITE ONLY			
Requirements	Response	Issue Type	Comments
<p><b>Instructions:</b> Use this Section to indicate the completeness of the files reviewed during the onsite review. Refer to Section 4 of the FDEM 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	