

ADMINISTRATIVE REQUIREMENTS

TABLE OF CONTENTS

CHAPTER 2: ADMINISTRATIVE REQUIREMENTS	3
CONFLICT OF INTEREST	3
EXCEPTIONS	3
RECORDKEEPING	5
FILES.....	5
GRANT AGREEMENT	5
MONITORING	6
DESK MONITORING	6
ON-SITE MONITORING VISIT	6
ATTACHMENTS.....	7
ATTACHMENT 2-A: DISCLOSURE OF POTENTIAL CONFLICT OF INTEREST (TEMPLATE).....	8
ATTACHMENT 2-B: TITLE 24 570 SUBPART I.....	9
ATTACHMENT 2-C: FILE CHECKLIST.....	11
ATTACHMENT 2-D1: PROJECT SIGN (SAMPLE).....	14
ATTACHMENT 2-D2: PROJECT SIGN (SPECIFICATIONS).....	15
ATTACHMENT 2-E: SELF-MONITORING CHECKLIST	16
ADDITIONAL NOTES: (optional).....	34

NOTES

CHAPTER 2: ADMINISTRATIVE REQUIREMENTS

An important part of any grant is grant administration. Grant administration includes ensuring conflict of interest requirements are followed, maintaining all required files and records and responding to any monitoring requests. Grant recipients are required to prepare, maintain and submit to the Division of Energy, Housing and Community Resources (DEHCR) all records required to document compliance with the Community Development Block Grant (CDBG) program. The Unit of General Local Government (UGLG) may choose to have staff be responsible for the grant administration or hire an outside entity.

CONFLICT OF INTEREST

The conflict of interest provision applies to any individual who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of an UGLG, or of any designated public agencies, or sub-recipients. Except for eligible administrative or personnel costs, the general rule for those individuals described above (who exercise or have exercised any functions or responsibilities with respect to CDBG activities and who are in a position to participate in a decision-making process or gain inside information with regard to such activities) is that they **may not**:

- Obtain a financial interest or benefit from the activity;
- Have an interest or benefit from the activity; nor
- Have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder.

This rule also applies during their tenure or for one year thereafter to themselves and to those individuals with whom there is a family or business tie.

To determine if there are any potential conflicts of interest, the UGLG should gather the above information at the point of bid submittal (for construction contracts) or proposal submittal (for professional services contracts). Potential contractors should be asked to disclose family or business ties to persons involved with the CDBG project that may be potential conflicts of interest. The *Potential Conflict of Interest Disclosure* (Attachment 2-A) may be used as a template for preparing a disclosure form for potential contractors.

EXCEPTIONS

An exception to the federal conflict of interest provisions may be requested from DEHCR and requires HUD approval. Contact the assigned DEHCR Project Representative for the specifications for this request. Prior to submitting the exception request, public disclosure of the potential conflict must be made. An opinion must be obtained from the corporate or municipal counsel stating that the interest for which the exemption is sought would not violate state or local law.

The following steps may be used to identify and review potential conflicts of interest, and request an exception to the federal conflict of interest provisions, if determined necessary:

1. Identify “covered persons” for the CDBG program;
2. Have potential contractors complete a *Potential Conflict of Interest Disclosure* form (Attachment 2-A) when responding to procurement solicitations (e.g., request for bids [RFB], request for proposals [RFP], request for qualifications [RFQ], etc.) or prior to contracting;
3. Inform any contractors with potential conflict of interest that their name will be disclosed at the local Board/Council/Committee meeting;
4. Add “disclosure of potential conflicts of interest” as a discussion item on the Board/Council/Committee agenda (covered persons identified in the disclosure of the potential conflict of interest should not attend this meeting or should recuse themselves from the discussion regarding the potential conflict of interest);
5. After contractors with the potential conflict(s) of interest have been identified, disclose the names and the nature of the potential conflict(s) of interest (family or business tie[s]) applicable projects;
6. Ask all in attendance at the bid/proposal/contract approval meeting if there are any objections to awarding the contractor(s) in question. The objective is to ask the public whether they have objections to awarding the contract for the CDBG funded project to the person(s) with the potential conflict(s) of interest;
7. The UGLG’s attorney must provide a letter of opinion certifying that the identified potential conflict(s) would not violate state or local law. The Request for Waiver to Conflict of Interest provision specifies the format for that certification (Attachment 2-B);
8. Submit to DEHCR the exception request (on municipal letterhead), the letter of opinion from the UGLG’s attorney, along with the agenda and minutes of the board/council meeting in which the potential conflict of interest was disclosed and reviewed; and
9. The UGLG must not sign the contract(s) in question until the exception decision has been received from DEHCR.

Please become familiar with the language included in the Code of Federal Regulations before undertaking any projects paid with CDBG funds. For more information, please refer to 24 CFR 570.489(h) (Attachment 2-B) provided in this chapter along with this link:

<https://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR>.

IMPORTANT REMINDER!

The UGLG’s Chief Elected Official may not receive a CDBG loan or any financial interest from the CDBG activity.

RECORDKEEPING

The UGLG must prepare, keep, maintain and submit to DEHCR all records required to document compliance with the CDBG program. This may include all contracts relating to the implementation of the *Grant Agreement*. **Such records shall be retained indefinitely until written notification from DEHCR.** Prior to disposal of any record the UGLG must send a request to DEHCR, and only upon receipt of written confirmation from the Division Administrator or his/her designee, may the records in question be destroyed.

FILES

Generally, all files should be kept at the UGLG's official location. If an UGLG decides to establish an electronic record-keeping system:

- It is recommended that paper copies of documents with original signatures be retained.
- The electronic system must be secure.
- Documents shall be stored on a network location protected with a password.
- Only designated personnel shall have access to the CDBG project electronic data.
- The system must also be accessible to DEHCR Project Representatives, HUD representatives and auditors upon request.

The UGLG should maintain grant files and documentation included on the *File Checklist* (Attachment 2-C).

GRANT AGREEMENT

DEHCR will send the *Grant Agreement* to grant recipients for review and signature. The *Grant Agreement* will be based upon the application submitted by the UGLG and contain the budget, scope of work, timetable, use of program income and commitment of additional funds, as stated in the application and pre-agreement documents provided by the UGLG. In addition, the *Grant Agreement* includes standard or "boiler plate" language to ensure compliance with state and federal requirements.

The UGLG's Chief Elected Official (CEO) must sign and date the *Grant Agreement*. The signed *Grant Agreement* must be returned to DEHCR for execution. After DEHCR signs, a fully executed copy will be returned to the UGLG.

DEHCR makes grant awards of specific dollar amounts for particular activities. If funded projects are completed for a lesser amount than was originally budgeted, excess CDBG funds will be recaptured by DEHCR and used to fund future grants.

MONITORING

UGLGs will be monitored at least once during the contract period of the *Grant Agreement*. The monitoring will be completed using one of the following methods.

DESK MONITORING

The UGLG may be asked to complete the *Self-Monitoring Checklist* (Attachment 2-E). The UGLG will be asked to provide copies of relevant supporting documentation to the DEHCR Project Representative. In addition, monitoring will include a review by a DEHCR Project Representative of the UGLG's documents on file with DEHCR.

ON-SITE MONITORING VISIT

When a DEHCR Project Representative visits an UGLG to monitor the CDBG project, the following may occur:

- The UGLG will be notified in advance of the monitoring visit. Dates and times are usually not negotiable unless unforeseen circumstances arise;
- The UGLG will receive a letter and/or email prior to the monitoring visit describing when the DEHCR Project Representative will arrive and the scope of monitoring;
- The UGLG may be requested to provide a conference room or other enclosed area in which at least two people can work comfortably;
- Representatives from DEHCR or HUD have the right to review any file or record that is associated with the CDBG project whether paper or electronic copy. UGLGs are required to provide access to all of the CDBG files;
- To ensure an efficient and smooth on-site monitoring, UGLGs should have, to the extent possible, the necessary forms and documentation ready and available for review; and/or
- The DEHCR Project Representatives monitoring the CDBG program may use the *Self-Monitoring Checklist* (Attachment 2-E). The UGLG may be required to complete and return it to the DEHCR Project Representative prior to the visit.

The *Self-Monitoring Checklist* (Attachment 2-E) and *File Checklist* (Attachment 2-C) are useful tools for UGLGs to use to verify that all files are completed both prior to monitoring and at project completion. UGLGs may use both checklists on an on-going basis to ensure that the necessary documents are being collected and maintained in the files throughout the project.

Monitoring by DEHCR does not exempt the UGLG from being monitored by HUD if HUD decides to do so.

IMPORTANT REMINDER!

Monitoring of the UGLG's project files can be done by DEHCR and/ or HUD at any time until written authorization is received from DEHCR that project files can be destroyed.

ATTACHMENTS

Attachments for this chapter are listed below.

- ATTACHMENT 2-A: DISCLOSURE OF POTENTIAL CONFLICT OF INTEREST (TEMPLATE)
- ATTACHMENT 2-B: TITLE 24 570 SUBPART I
- ATTACHMENT 2-C: FILE CHECKLIST
- ATTACHMENT 2-D1: PROJECT SIGN (SAMPLE)
- ATTACHMENT 2-D2: PROJECT SIGN (SPECIFICATIONS)
- ATTACHMENT 2-E: SELF-MONITORING CHECKLIST

**ATTACHMENT 2-A: DISCLOSURE OF POTENTIAL CONFLICT OF INTEREST
(TEMPLATE)**

POTENTIAL CONFLICT OF INTEREST DISCLOSURE

<Insert Title of Project>
<Insert Municipality Name, e.g. City of Yourville>

Do you have family or business ties to any of the people listed below?

Yes No

If yes, please check the box next to the name(s) of the individual(s) and describe the relationship in the space provided below:

ELECTED OFFICIALS:

- <INSERT FULL NAME AND TITLE OF CHIEF ELECTED OFFICIAL>*
- <INSERT FULL NAME AND TITLE OF OTHER ELECTED OFFICIAL>*
- <INSERT FULL NAME AND TITLE OF OTHER ELECTED OFFICIAL>*

<INSERT MUNICIPALITY TYPE> ADMINISTRATION, DEPARTMENT HEADS AND
LEGAL COUNSEL:

- <INSERT FULL NAME AND TITLE >*
- <INSERT FULL NAME AND TITLE >*
- <INSERT FULL NAME AND TITLE >*

ENGINEERING AND CONSULTING FIRM(S):

- <INSERT FULL NAME AND TITLE >*
- <INSERT FULL NAME AND TITLE >*
- <INSERT FULL NAME AND TITLE >*

Description of Relationship(s):

Please Note: The name of any bidder with a potential conflict of interest will be disclosed at the *<Insert Governing Body Name, e.g., City Council, Village or Town Board>* meeting in which bids are discussed. Potential conflicts of interest will be reviewed in accordance with 24 CFR 570.489(h).

(Name)	(Title)	(Signature)
<hr/>		<hr/>
(Company)	(Date [mm/dd/yyyy])	

ATTACHMENT 2-B: TITLE 24 570 SUBPART I

Code of Federal Regulations Title 24 570.489(h) Program administrative requirements

(h) Conflict of interest:

(1) Applicability. (i) In the procurement of supplies, equipment, construction, and services by the States, units of local general governments, and sub-recipients, the conflict of interest provisions in paragraph (g) of this section shall apply.

(ii) In all cases not governed by paragraph (g) of this section, this paragraph (h) shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance with CDBG funds by the unit of general local government or its sub-recipients, to individuals, businesses and other private entities.

(2) Conflicts prohibited. Except for eligible administrative or personnel costs, the general rule is that no persons described in paragraph (h)(3) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this subpart or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

(3) Persons covered. The conflict of interest provisions for paragraph (h)(2) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, or sub-recipients which are receiving CDBG funds.

(4) Exceptions: Thresholds requirements. Upon written request by the State, an exception to the provisions of paragraph (h)(2) of this section involving an employee, agent, consultant, officer, or elected official or appointed official of the state may be granted by HUD on a case-by-case basis. In all other cases, the state may grant such an exception upon written request of the unit of general local government provided the state shall fully document its determination in compliance with all requirements of paragraph (h)(4) of this section including the state's position with respect to each factor at paragraph (h)(5) of this section and such documentation shall be available for review by the public and by HUD. An exception may be granted after it is determined that such an exception will serve to further the purpose of the Act and the effective and efficient administration of the program or project of the state or unit of general local government as appropriate. An exception may be considered only after the state or unit of general local government, as appropriate, has provided the following:

(i) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(ii) An opinion of the attorney for the state or the unit of general local government, as appropriate, that the interest for which the exception is sought would not violate state or local law.

(5) Factors to be considered for exceptions. In determining whether to grant a requested exception after the requirements of paragraph (h)(4) of this section have been satisfactorily met, the cumulative effect of the following factors, where applicable, shall be considered:

(i) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available;

(ii) Whether an opportunity was provided for open competitive bidding or negotiation;

(iii) Whether the person affected is a member of a group or class of low or moderate income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

(iv) Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted activity in question;

(v) Whether the interest or benefit was present before the affected person was in a position as described in paragraph (h)(3) of this section;

(vi) Whether undue hardship will result either to the State or the unit of general local government or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

(vii) Any other relevant considerations.

ATTACHMENT 2-C: FILE CHECKLIST

GRANT APPLICATION

- Application with signed Eligibility Certification, as submitted to DEHCR
- Authorizing resolution (for Application Submission)
- CDBG Application Public Hearing Notice
- CDBG Application Public Hearing Minutes and/or Public Hearing Certification
- CDBG Application Public Hearing Completed Sign-In Sheet
- Citizen Participation Plan
- Citizen Participation Plan Adopting Resolution
- Lobbying Certification form
- Statement of Assurances
- Fair Housing Ordinance and adopting resolution
- Fair Housing Actions Checklist
- Fair Housing Actions Checklist documentation of activities completed
- Income Survey methodology, including documentation of survey distribution process, and survey response calculations (if applicable)
- Income Survey completed/returned surveys (if applicable)
- Income Survey area map (if applicable)
- Copy of Policy/Policies in Compliance with Requirements for Non-Violent Civil Rights Demonstrations (prohibiting use of excessive force and the barring of exits and entrances)
- Copy of the Relocation Plan/Anti-Displacement Policy
- Acquisition/Relocation/Demolition Policy
- Application Correspondence

GRANT AGREEMENT

- Award Letter
- Grant Agreement
- Grant Agreement amendment(s) (if applicable)
- Grant Agreement correspondence

PROCUREMENT & CONTRACTING

- UGLG's Procurement Policy
- Conflict of Interest Evidenced Waiver Process (if applicable)
- Evidence of open, free, and fair procurement practices related to the recruitment and hiring of contractors, consultants, inspectors, engineers, attorneys, and auditors, each of which must include:
 - Project specifications
 - Copy of sealed bid process and bid opening requirements
 - Request for Proposals (RFP) published advertisement
 - Copies of bids submitted
 - Method of bid evaluation (e.g., bid tabulation)
 - Board/Council acceptance of successful bid
 - Evidence of clear debarment status – System Award Management <https://www.sam.gov/portal/public/SAM/>
- Federal employer identification number (FEIN) for each prime contractor and sub-contractor
- Signed Lobbying Certification for each prime contractor and sub-contractor
- Executed contracts for each prime contractor and sub-contractor, with the required language for Labor Standards, Civil Rights/Equal Opportunity and Section 3 compliance.

ENVIRONMENTAL REVIEW (ER)

- Environmental Review Record (ERR)
- Request for Release of Funds and Certification or Determination of Exemption
- Related correspondence
- ERR Certification Letter or Letter of Concurrence (CDBG Planning projects only) from DEHCR

ACQUISITION/RELOCATION (if applicable)

- Acquisition/Relocation Monitoring Checklists
- Documentation of real property acquisition and relocation, including correspondence, notices, appraisals, payments, etc.(as listed on the Monitoring Checklists)
- Relocation Plan

EQUAL OPPORTUNITY (EO)

- Demographic profile
- Affirmative Action Plan notice posted in conspicuous place (applicable to non-governmental subrecipients only; UGLGs exempt from this requirement)
- Current list of MBE/WBE contracts/subcontracts
- Current list of Section 3 businesses
- Record to document promotion of employment and training to LMI businesses and individuals
- Fair Housing Activities
- Accessibility Self-Evaluation Checklist (if applicable)
- Non-violent Civil Rights Demonstration/Excessive Use of Force policy or policies

LABOR STANDARDS (Files must be organized by contractor, including prime contractor(s) and sub-contractor(s))

- Determination of Exemption letter (if applicable)
- Labor Standards Officer Designation form
- Force Account letter (if applicable)
- Copy of wage decision and Form 308
- Statement of applicable state and federal wage rates from the State of Wisconsin's Department of Workforce Development (http://dwd.wisconsin.gov/er/prevaling_wage_rate/default.htm) and the federal Department of Labor (<https://www.dol.gov/whd/>)
- Report of classifications and wage decisions
- HUD Form 4010 applicable language
- Documentation of required posting at the construction site of wage rates, hours, etc.
- Weekly payroll reports for each contractor and sub-contractor
- Weekly certified payroll statement of compliance for each contractor/sub-contractor
- Authorized deductions (e.g. court orders, child support, etc.)
- Apprenticeship documentation (if applicable)
- Employee interview reports (i.e., HUD-11 forms)
- Identification of underpayments (if any) and correction by contractor
- Semi-Annual Labor Standards Enforcement Reports (LSERs)
- Final Labor Standards Compliance Report (LSCR)
- Pre-construction Report/Minutes
- Contractor verification including applicable construction certifications and licenses
- Evidence of clear debarment status – System Award Management <https://www.sam.gov/portal/public/SAM/>
- Notice of Award Letter to Contractor
- Notice of Award form (form submitted to DEHCR)

- Notice to Proceed Letter
- Photo documentation of posted project sign (Attachment 2-D)
- Photo documentation of posted wage decision(s) on site

FINANCIAL MANAGEMENT

- Depository Certification
- Signature Certification
- Financial Contact Person form
- Electronic or Paper Check Deposit Authorization form (STAR forms)
- Request for Disbursement (Drawdown Requests)
- Cash Control Register
- Disbursement Journal
- Source Documentation for Disbursements (e.g., invoices and contractor pay applications documenting expenditures)
- Canceled checks (if applicable)
- Evidence of Deposits
- Bank statements, deposit slips, etc.
- Matching Funds Journal
- Business Matching Funds Journal (PFED)
- Source documentation for matching funds including: invoices, contractor pay applications, donation checks, other checks and canceled checks

REPORTING

- Semi-annual Narrative Report on Accomplishments (reporting accomplishments toward Project Scope of Work, as outlined in the Grant Agreement)
- Accomplishment Data
- MBE/WBE Reports
- Section 3 Reports
- Employment and Training Accomplishments (if applicable)
- Monitoring related correspondence and supporting documentation

PROJECT COMPLETION

- Signed Completion Report and supporting documents, as submitted to DEHCR
- Final Disbursements Journal and Cash Control Register showing the deposit and disbursement of the final CDBG payment to the UGLG
- Completion Letter and signed Completion Certification from DEHCR

SINGLE AUDIT

- Annual Single Audit Statement(s)/Letter(s)
- Annual Correspondence to DEHCR regarding Single Audit Report(s)(if applicable)
- Annual Single Audit Report(s) (if applicable)
- Resolution of Single Audit findings documentation (if applicable)

ATTACHMENT 2-D1: PROJECT SIGN (SAMPLE)

Community Name:

Project Type: (i.e. Water Tower, Library, Community Center)

A COMMUNITY FACILITIES PARTNERSHIP
FINANCED IN PART BY COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
**FROM THE WISCONSIN DEPARTMENT OF ADMINISTRATION AND THE
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Scott Walker, Governor
Scott Neitzel, Secretary

Community Official's Name and Title (i.e. Mayor, Village President, Chair)

State and Federal Equal Opportunity laws apply in the construction and use of this project

ATTACHMENT 2-D2: PROJECT SIGN (SPECIFICATIONS)

The following sign (*pictured as an example on the previous page*) is to be erected near the site of construction, containing the information (below) according to the following format.

SPECIFICATIONS:

Sign dimensions: 4 feet by 8 feet
Plywood panel APA Rated A-B Grade-Exterior
White background
Following text in **RED**:

**A COMMUNITY FACILITIES PARTNERSHIP
FINANCED IN PART BY COMMUNITY DEVELOPMENT BLOCK GRANT FUNDS
FROM THE WISCONSIN DEPARTMENT OF ADMINISTRATION
AND THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

All other text in black.

PLEASE NOTE: The smallest print must be readable
from 50 feet away.

ATTACHMENT 2-E: SELF-MONITORING CHECKLIST

CDBG UGLG SELF-MONITORING CHECKLIST Complete the following document and submit to the designated Division of Energy, Housing and Community Resources Program Representative, as requested.	
UGLG:	
CDBG Agreement Number:	
Reviewer's Name and Title: <i>(person completing this form)</i>	
Date Completed:	Reviewer's Phone Number:
I attest that the information herein is true and correct. <div style="float: right; margin-right: 50px;"> _____ Date Signed </div>	
_____ Signature of Chief Elected Official	_____ Printed Name of Elected Official and Title

During the Contract Period **all UGLGs will be monitored and must complete this Self-Monitoring Checklist as part of the monitoring process.**

INSTRUCTIONS:

1. Complete the *Self-Monitoring Checklist* and review the CDBG project folder and mark the "Yes", "No", "Not Applicable (N/A)", and/or "Date" fields (where appropriate) to indicate that you either do or do not have each of the listed documents and described information currently stored within the on-site CDBG project folder.
2. Sign and date the document.
3. Make and retain a copy of the signed and dated document for your records.
4. Return this completed document (preferably in an electronic PDF format, via email) to the assigned DEHCR Project Representative by the date indicated in the letter that accompanies this document.

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3. Procurement & Contracting Documentation: (Indicate whether these items are present within the CDBG project folder.)	YES	NO	N/A	Date:
Copy of UGLG's Procurement Policy				
Conflict of Interest Exception Request documentation (if applicable)				
Mechanisms/documentation in place for the disclosure and review of potential conflicts of interest				
Procurement Documentation for CONSTRUCTION:				
Sealed Bid Process and Bid Opening Requirements Documentation*				
The Request for Bids (RFB) states requirements for services and project specifications				
The RFB identified all significant evaluation factors including price and their relative importance*				
The RFB was published*				
Copy of bid tabulation AND successful bid document*				
Bids were solicited from an adequate number of providers (Total number solicited* = _____)				
All bids were evaluated and the evaluation is documented*				
The contract award(s) went to the contractor(s) with the lowest responsible bid(s).				
Board/Council Acceptance of the Successful Bid Documentation*				
Signed Lobbying forms from all contractors (Complete the related checklist for prime contractors and subcontractors, presented later in this document.)"				
Executed contracts, including Civil Rights Compliance and Section 3 compliance language.*				
Procurement Documentation for GRANT ADMINISTRATION Services:				
Are any of the Grant Administration costs being paid with CDBG funds?"				
The contracting for Grant Administration is in compliance with the UGLG's local procurement policy."				
Request for Proposals Process Documentation				
The Request for Proposal (RFP) states requirements for services and project specifications*				
The RFP identified all significant evaluation factors including price and their relative importance*				
The RFP was published*				
All proposals were evaluated and the evaluation is documented*				
The award(s) was made to the consultant/vendor/provider whose proposal was most advantageous to the UGLG after all factors were considered*				
Board/Council Acceptance of the Successful Proposal*				
Signed Lobbying form from contracted Grant Administrator				
Executed contracts, including Civil Rights Compliance and Section 3 compliance language.*				

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6. Equal Opportunity Documentation: (Indicate whether these items are present within the CDBG project folder.)	YES	NO	N/A	Date:
Demographic profile of UGLG's community or target area approximate census profile				
Affirmative Action Plan notice posted in a conspicuous place (if applicable)				
Record of evidence demonstrating promotion of employment and training opportunities to LMI businesses and individuals				
Section 3 job creation tracking system and reports*				
Section 3 contract language is inserted into contract document(s)*				
Has the UGLG made their best efforts to employ Section 3 businesses?				
Has the UGLG made their best efforts to employ MBE/WBE businesses?				
Minority and Women Business Enterprises (MBE/WBE) tracking system and reports*				
Executive Order 11246 language inserted into contract documents?*				
Fair Housing Actions Documentation*				
Briefly list Fair Housing Actions completed: 1. 2. 3.				
Accessibility Self-Evaluation Checklist (if applicable)				
<i>*Items may also be maintained in the Procurement or Reporting files.</i>				

Additional Notes/Comments:

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7. Labor Standards Documentation: <small>(Indicate whether these items are present within the CDBG project folder.)</small>	YES	NO
Do labor standards apply to this project?		
<i>If No, explain and skip to Section 8:</i>		
<i>If Yes, complete the following:</i>		
Name/phone number/email of Labor Standards Officer:		
Is a formal designation of the labor standards officer on file and up to date?		
Make a copy of the items below with an asterisk (*) and complete the information for each prime contract awarded under separate bid(s): <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>*Project No. (CDBG # and Line Item #):</p> <p>*Bid Advertisement Date:</p> <p>*Contract Award Date:</p> <p style="margin-left: 40px;">*Wage Decision #(s):</p> <p style="margin-left: 80px;">*Modification #(s):</p> <p style="margin-left: 120px;">*Date(s):</p> </div> <div style="width: 50%;"> <p>*Bid Opening Date:</p> <p>*Construction Start Date:</p> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <u>WD 1</u> <u>WD 2</u> <u>WD 3</u> </div> </div> </div>		
Labor Standards (continued)	YES	NO
Was a Pre-Construction Meeting held?		
<i>If No, explain how the grant requirements were communicated to all Contractors and Sub-Contractors:</i>		
Is/Was there a construction sign posted for the projects(s)?*		
Has the UGLG completed and submitted a Final Fair Labor Standards Compliance Report?		
Is a system in place to ensure that all payrolls and related records are maintained by the UGLG until informed by the DEHCR Division Administrator (or designee) that CDBG project records may be discarded?		
Is a Force Account Letter on file? (if applicable – for project not subject to Davis-Bacon due to being a public works project completed by municipality employees)		

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Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
CONTRACTOR(S) NAME(S)								
Is there a specific file for this project?	Yes No							
Contractor Information (continued)								
Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
Did the UGLG follow state law and federal OMB in awarding this prime contract?	Yes No	Yes No	N/A	N/A	N/A	N/A	N/A	N/A
Is wage decision(s) included in bid document(s) and construction contract(s)?	Yes No							
Is the HUD 4010 Labor Standards Provision in the construction bid specification(s) and contract(s)?	Yes No							
Are wage decision(s) posted in an area accessible to all employees?	Yes No							
Have all contractors/sub-contractors submitted their IRS Employer Identification Number?	Yes No							
Are payrolls submitted weekly or "no work" letter(s)/statement(s) filed?	Yes No							
Are payrolls numbered? (first to last)	Yes No							
Does an authorized person of the company sign the certified payroll(s)?	Yes No							
Are all workers' individual identification numbers (e.g. employee ID numbers, last four social security numbers, etc.) shown on at least the first payroll?	Yes No							
Do hourly wage rates shown on the payroll equal or exceed the wage rates in wage decision(s)?	Yes No							
Is there Form 4230A (additional classification) for those classifications not shown in the wage decision?	Yes No N/A							
Is time and a half paid to workers for work performed over 40 hours per week?	Yes No N/A							
If worker is listed in two classifications, did s/he sign the payroll, or was a daily time record submitted?	Yes No N/A							
Are "other" deductions properly documented?	Yes No N/A							

CDBG-PF & CDBG-PLNG Implementation Handbook

Contractor Information (continued)								
Complete the following by circling Yes, No, or N/A.	Prime #1	Prime #2	Sub #1	Sub #2	Sub #3	Sub #4	Sub #5	Sub #6
Are employee interview forms (HUD-11) completely filled out, compared with payrolls, and signed by payroll examiner? Number of employee interview forms (HUD-11) complete:	Yes No N/A							
Are the proper apprentice/trainee indentures attached to payrolls where such employees appear?	Yes No N/A							
Are apprentices/trainees working alone?	Yes No N/A							
Does payroll examiner sign off on payouts of wage underpayments?	Yes No N/A							
Wage Underpayments Collected Monies? Amount Collected:	Yes No N/A							
Are all violations resolved?	Yes No N/A							
If all violations are NOT resolved, explain why and provide their current status(es):								
Wage Underpayments due to Unpaid Overtime Collected Monies per HUD CWHSSA? Amount Collected:	Yes No N/A							
Are all violations resolved?	Yes No N/A							
If all violations are NOT resolved, explain why and provide current status of each:								
Other comments or recommendations:								

CDBG-PF & CDBG-PLNG Implementation Handbook

List Names, the corresponding I.R.S. Employer Identification Number, the Debarment Check Status, and the Lobbying Certification Status of all Prime Contractor(s):

Contractor:	Name:	I.R.S. Employer Identification Number:	SAM.gov Debarment Check on File? (Yes or No)	Signed Lobbying Certification on File? (Yes or No)	Contract on File (Yes or No)
Prime Contractor #1					
Prime Contractor #2					
Prime Contractor #3					
Prime Contractor #4					
Prime Contractor #5					
Prime Contractor #6					

List Names, the corresponding I.R.S. Employer Identification Number, the Debarment Check Status, and the Lobbying Certification Status of all Sub-Contractor(s):

Sub-Contractor:	Name:	I.R.S. Employer Identification Number:	SAM.gov Debarment Check on File? (Yes or No)	Signed Lobbying Certification on File? (Yes or No)	Contract on File (Yes or No)
Sub-Contractor #1					
Sub-Contractor #2					
Sub-Contractor #3					
Sub-Contractor #4					
Sub-Contractor #5					
Sub-Contractor #6					
Sub-Contractor #7					
Sub-Contractor #8					
Sub-Contractor #9					
Sub-Contractor #10					
Sub-Contractor #11					
Sub-Contractor #12					
Sub-Contractor #13					

CDBG-PF & CDBG-PLNG Implementation Handbook

8. Financial Management Documentation: (Indicate whether these items are present within the CDBG project folder.)				
Bank Documents:	YES	NO	N/A	Date:
Depository Certification form				
Signature Certification form				
Financial Contact Person form				
Bank Statements				
Payments (“Drawdowns”) Documents:	YES	NO	N/A	Date:
Request for Payment (Draw) forms				
Notification of Deposit (e.g., deposit slip)				
Cash Control Register (CCR) Documents:	YES	NO	N/A	Date:
CCR copies all in file				
Deposit dates agree with the date deposit notifications were received from bank				
Payment dates agree with the Payments Journal and check register				
Reports balance of cash on hand each day a payment or deposit was made				
Account does not have more than \$5,000 of federal cash on hand for more than three days. Exceptions noted:				
Is mathematically correct				
Cumulative Payments to date per CCR:	\$			
Total payments to date per Payments Journal:	\$			
The adjusted balance and balance per bank statement dated:				
Balance per CCR:	\$			
(-) Deposits in Transit	\$			
(+) Checks Outstanding	\$			
(=) Adjusted Balance	\$			
Comments:				
Disbursements Journal:	YES	NO	N/A	Date:
Disbursements Journal copies all in file				
Reports the award amount, activities and amounts in the header row				
Accounts for the sequence of grant checks issued and indicates which, if any, are voided				
Corresponds to checks issued and bank statements with regard to amount, date, payee				
Reports disbursements per month, in total and by budget activity, per/by payment request				
Reports cumulative disbursements to date in total and by budget activity, for each CDBG payment request				

CDBG-PF & CDBG-PLNG Implementation Handbook

Reports disbursements per CDBG payment request, in total, and by budget activity				
Source documentation is mathematically correct				
Source documentation for disbursements: (e.g., invoices from contractors and others, canceled checks, engineer approval of expenditures)				
Comments:				
Matching Funds Journal:	YES	NO	N/A	Date:
Matching Funds Journal copies all in file				
Cumulative match equals/exceeds the contracted "commitment of other parties" amount				
Lists each check number, date, and payee claimed as match				
Are CDBG funds deposited into same account from which UGLG is claiming match?				
Source documentation: (e.g., invoices from contractors and others, canceled checks, engineers approval of expenditures)				
Comments:				

Additional Notes/Comments:

CDBG-PF & CDBG-PLNG Implementation Handbook

9. Reporting Documentation: <small>(Indicate whether these items are present within the CDBG project folder.)</small>	YES	NO	N/A	Date:
Semi-Annual Narrative Reports on Accomplishments with UGLG Certification Signature:				
Reporting Period #1 from _____ through _____				
Reporting Period #2 from _____ through _____				
Reporting Period #3 from _____ through _____				
Reporting Period #4 from _____ through _____				
Semi-Annual Labor Standards Enforcement Reports*				
Reporting Period #1 from _____ through _____				
Reporting Period #2 from _____ through _____				
Reporting Period #3 from _____ through _____				
Reporting Period #4 from _____ through _____				
Semi-Annual MBE/WBE Reports*				
Reporting Period #1 from _____ through _____				
Reporting Period #2 from _____ through _____				
Reporting Period #3 from _____ through _____				
Reporting Period #4 from _____ through _____				
Section 3 Reports*				
Reporting Period #1 from _____ through _____				
Individual reports collected from Prime Contractor(s)?				
Individual reports collected from Sub-Contractor(s)?				
Reporting Period #2 from _____ through _____				
Individual reports collected from Prime Contractor(s)?				
Individual reports collected from Sub-Contractor(s)?				
Reporting Period #3 from _____ through _____				
Individual reports collected from Prime Contractor(s)?				
Individual reports collected from Sub-Contractor(s)?				
Reporting Period #4 from _____ through _____				
Individual reports collected from Prime Contractor(s)?				
Individual reports collected from Sub-Contractor(s)?				
Project/job performance reports (ED and PFED Only)*				
Reporting Period #1 from _____ through _____				
Reporting Period #2 from _____ through _____				
Reporting Period #3 from _____ through _____				
Reporting Period #4 from _____ through _____				
<i>*Items may also be maintained in the Labor Standards file.</i>				

Additional Notes/Comments:

CDBG-PF & CDBG-PLNG Implementation Handbook

10. Project Completion Documentation: (Indicate whether these items are present within the CDBG project folder.)	YES	NO	N/A	Date:
Signed Program Completion Report and Supporting Documents, as submitted to DEHCR				
Final Cash Control Register (after CDBG final payment received by UGLG)				
Final Disbursement Journal (after CDBG final payment received by UGLG)				
Final CDBG Account Bank Statement (after CDBG final payment received by UGLG)				
Final Plan (PLNG Only)				
Council/Board Approval or Adoption of Plan Documentation (PLNG Only)				
Final Job Creation/Retention Documents (ED and PFED (Only)				
Evidence of Payment of Claims after Submittal of Completion Report				

Additional Notes/Comments:

11. Single Audit Documentation: (Indicate whether these items are present within the CDBG project folder.)	YES	NO	N/A	Dates:
Annual Single Audit Statement(s)/Letter(s)				
Annual Correspondence for Single Audit(s) to DEHCR (if applicable) For year(s): _____ to _____				
Single Audit Report(s) (if applicable)				
Resolution of Single Audit Findings documentation (if applicable)				

Additional Notes/Comments:

ADDITIONAL NOTES: (optional)