

Environmental Review Records

A. Determine that all conditions (environmental and contractual) were satisfied Prior to the expenditure of funds. (Only expenditures for General Administration, Program Management, Engineering and Design Work may be incurred prior to the release date.)

1. Grant Award Date

2. Environmental Release of Funds Date

3. Expenditures for Program Activities

a) Environmental Release of Funds with conditions?	Yes	No	N/A
b) If yes, have the conditions been fully satisfied?	Yes	No	N/A

Describe basis for conclusion:

3. Expenditures for Program Activities

a) General Administration

b) Program Management

c) Other program activities (list what type):

4. Date construction contract executed

5. Is the execution of construction contract in compliance with the environmental release date?

Yes

No

N/A

Describe basis for conclusion:

6. Check to see that no factors exist to warrant a reassessment.

An amendment in the Grant activities and scope of the project	Yes	No	N/A
Are secondary impacts now apparent	Yes	No	N/A
Have new circumstances come about	Yes	No	N/A
Do additional or newly discovered environmental factors exist	Yes	No	N/A

7. Grant Agreement Amendment:

Has an amendment been executed	Yes	No	N/A
If yes, was there an environmental review	Yes	No	N/A
If no, should there have been one	Yes	No	N/A
Is there adequate documentation indicating why a new Environmental Review was not necessary	Yes	No	N/A

Describe basis for conclusion:

Notes:

Program Performance

1. Is the management System adequate for:

Personnel	Yes	No	N/A
Monitoring	Yes	No	N/A
Procurement	Yes	No	N/A
Labor Standards	Yes	No	N/A
Record Keeping	Yes	No	N/A
Program/Municipal Coordination Document Controls	Yes	No	N/A

Describe basis for conclusion:

2. Determine that each CDBG activity meets one of the three National Objectives:

Activity	Low/Mod	Slums/Blight	Urgent Need
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Describe basis for conclusion and identify the source documentation maintained by the Grantee that supports this conclusion:

3. Are the Grantee personnel policies adequately posted:

Civil Rights (24 CFR 570.506(g), 570.601, 570.602, and 570.607) As part of the application process, the Agency submits a list of applicant municipalities to the Human Rights Commission to ensure no formal discrimination complaints are outstanding with any applicant.

Civil Rights/Equal Employment Opportunity Policy is adopted	Yes	No	N/A
Is the facility where applications for program benefits are taken, or administrative office, handicapped accessible?	Yes	No	N/A
Are public meetings held in handicapped accessible locations?	Yes	No	N/A
Drug Free Workplace	Yes	No	N/A
Fair Housing Policy	Yes	No	N/A

Describe basis for conclusion:

4. Check project performance against the criteria set forth:

Project is on Schedule per the Grant Agreement	Yes	No	N/A
Program is within the budget	Yes	No	N/A
Project area(s) is as described in Grant agreement	Yes	No	N/A
Special Conditions set out in Attachment A of the Grant Agreement have been or will be met	Yes	No	N/A

Describe basis for conclusion:

5. Management Structure and administrative capacity

Number of staff involved

Is skill and experience of the staff adequate	Yes	No	N/A
Is skill and experience of the staff adequate	Yes	No	N/A
Is the overall performance of the project satisfactory	Yes	No	N/A

Describe basis for conclusion:

PROCUREMENT

Name of Contractor

1. Types of Procurement

Small purchases

Competitive Sealed Bids

Competitive Negotiated Procurements

Non-Competitive Negotiated Procurement (Sole Source)

2. Small Purchase Procurement Process:

Not a fragmentation of large purchase to avoid bidding requirement

N/A
Yes No N/A

Price quotations are consistent with Agency Procedures

Yes No N/A

Lease vs. Purchase option considered

Yes No N/A

Invoice, payment voucher confirms price Quotations

Yes No N/A

Describe basis for conclusion:

3. Competitive Sealed Bids Procurement Process

N/A

Bidding & Selection process documented

Yes No N/A

Advertisement complete and documented

Yes No N/A

Correct wage rates were secured

Yes No N/A

Bidding instruction was cleared and specifications completed

Yes No N/A

Basis for selection clearly stated

Yes No N/A

Reference to Civil Rights, Labor Standards, and other statutory requirements, as appropriate

Yes No N/A

Evidence of outreach to minority, women-owned or small businesses

Yes No N/A

Bid opening Date

Evidence of Minutes of Bid Opening

Yes No N/A

Bid tabulation

Yes No N/A

Bid bond

Yes No N/A

Letter to rejected bidder

Yes No N/A

Lowest bid was accepted	Yes	No	N/A
Value Engineering conducted	Yes	No	N/A
If yes, proper language in bid document	Yes	No	N/A
Fixed price Contract	Yes	No	N/A

Describe basis for conclusion:

4. Competitive Negotiated Procurements:			N/A
Request for Proposal (RFP) or Request for qualifications (RFQ) on file	Yes	No	N/A
Competition was encouraged	Yes	No	N/A
Evidence of outreach to minority, women-owned or small businesses	Yes	No	N/A
Evaluation process documented	Yes	No	N/A
Negotiation Conducted	Yes	No	N/A
Lowest price proposal accepted	Yes	No	N/A
Fixed price contract	Yes	No	N/A
Bid Bond	Yes	No	N/A

Describe basis for conclusion:

5. Non-Competitive Negotiated Procurement (Sole Source):			N/A
Documentation of need	Yes	No	N/A
Approval by the Agency	Yes	No	N/A
Reasonable price or cost	Yes	No	N/A
Fixed price contract	Yes	No	N/A

Describe basis for conclusion:

Contracts

1. Review contracts over \$2000, and verify the inclusion of the following:

Minutes of pre-construction meeting	Yes	No	Date:
Construction Award Date			Date:
Start of Construction			Date:
Notice to proceed	Yes	No	Date:
Construction Contract	Yes	No	Date:
Name of Contractor			
Contract Amount			
Payment Bond	Yes	No	N/A
Performance Bond	Yes	No	N/A
HUD Debarment Status Checked	Yes	No	N/A
SAMS Date			
Registered to do business in Vermont	Yes	No	N/A
Name, address & identification number of the contractor	Yes	No	N/A
Proper signatures	Yes	No	N/A
Detailed scope of work	Yes	No	N/A
Term of contract	Yes	No	N/A
Maximum payment under breach/non-compliance pass through provision	Yes	No	N/A
Remedies for breach/ non-compliance pass through provision	Yes	No	N/A
Reporting requirements by contractor	Yes	No	N/A
Davis-Bacon Wage Decision #	Yes	No	N/A
Correct Wage Decision rate was used	Yes	No	N/A
Copeland Anti-Kickback citation	Yes	No	N/A
Contract Work Hours and Safety Standards	Yes	No	N/A
Section 109 (equal provision of benefits) Civil Rights	Yes	No	N/A
Section 3 (encourage DBE's and WBE's)			
Clean Air and Water Act (contract over \$100,000)	Yes	No	N/A
Environmental Issues	Yes	No	N/A
State requirements are stated	Yes	No	N/A

Describe basis for conclusion:

2. Contract file and administrative procedures:

Workers compensation Policy Number	Yes	No	N/A
List of subcontractors with dollar amount or subcontractor's contracts	Yes	No	N/A
Invoices are approved by architect/engineer or qualified individuals	Yes	No	N/A
Change orders on approved form and sign by contractor	Yes	No	N/A

Describe basis for conclusion:

Labor Standards

Labor Standards Compliance

Project Name:

Location of the Project:

Description of the project:

Name of Contractor:

Labor Standards Documents:

Is wage decision correct	Yes	No	N/A
Payrolls submitted weekly	Yes	No	N/A
Payrolls numbered sequentially	Yes	No	N/A
Payrolls signed by employer or authorized rep	Yes	No	N/A
Were fringe benefits provided	Yes	No	N/A
Has overtime been paid	Yes	No	N/A
Apprentice/Trainee records	Yes	No	N/A
Record of additional classifications	Yes	No	N/A
Employee interviews completed	Yes	No	N/A
Are interviews compared against payrolls	Yes	No	N/A
Are violations and wage restitution documented	Yes	No	N/A

Describe basis for conclusion

Financial Management Process

- A. Discuss the financial process followed for this grant with appropriate person(s) to get general overview, being certain to cover the following:**
1. Describe the process for submitting requisitions at the Municipal level.

Is this Process Adequate?

Yes

No

2. The flow of the VCDP funds once deposited into depository account including the procedures and persons able to transfer/expend the funds.

Is this Process Adequate?

Yes

No

3. Who maintains and controls the accounting records and ledgers?

Grantee Or

Administrator

4. Who reviews and approves the expenditures for compliance with the grant agreement, allowability under agency procedures, and for mathematical accuracy?

5. Is the work inspected prior to release of payment, if so by whom?

Describe basis for conclusion

6. Is a percentage of payment retained with each invoice?

Describe basis for conclusion

7. Who reports the financial status of the grant to the municipal governing body (Board of Selectmen, T/C Manager, etc.) on a regular basis?

Is the Process Adequate?

Yes

No

8. Who is the financial person(s) at subrecipient level?

Is the Process Adequate?

Yes

No

C. Segregation of Duties

Determine if the following is documented:

Expenditures reviewed and approved by proper official	Yes	No
Review non-profit organization chart or municipal-warrant process followed?	Yes	No
The individual signing the checks does not approve payment	Yes	No
If not segregated, can the grantee/administrator segregate duties with existing staff: Reconciliation of bank statements independent of writing checks and authorizing payments	Yes	No
Independent review of approved payments is conducted periodically to certify existence of an adequate internal control system	Yes	No
Are the internal controls adequate to manage grant funds	Yes	No

Describe basis for conclusion:

D. Review the financial management system to determine if the following requirements were met:

Non-Interest bearing depository account for grant	Yes	No
Account has adequate collateralization to cover more than \$250,000 FDIC	Yes	No
Have there been any draws over \$250,000	Yes	No
Do you plan on doing any draws over \$250,000	Yes	No
Accounting records support figures reported on latest progress reports	Yes	No
Is latest progress report delinquent	Yes	No
Latest progress report date:		

Describe basis for conclusion:

Financial Record Review

Review the accounting ledgers and journals for adequacy in meeting the financial management requirements of the Grant Agreement.

Ledger	Journal	Exists	Adequate
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Cash Control

VCDP Budget by Grant Activity

Other Res. Budget by Grant Activity

Cash Receipts

Cash Disbursements

Describe the basis for conclusion:

Were the ledger/journal keeping systems adequate for meeting the financial management of the grant?

Yes No

Were filing and record keeping systems adequate to allow department review and audits?

Yes No

Describe basis for conclusion:

Time Sheet Review

Review the Adequacy of Documentation:

If direct salaries and wages of employees were charged to the grant for general administration, identify personnel below:

Personnel	Pay Period reviewed	Time Sheet in Compliance	
		Yes	No

Describe basis for conclusion:

VCDP Requisition Review

Requisition Number	Drawdown Date	Requisition Amount	Date of Grantee's Deposit	Deposit Amount	Date Balance Back to \$5,000 Or Less	Number of Days Over \$5,000 (If Over 10)
Total						

Describe basis for conclusion:

Is there a good indication that Other Resources will be expended by the Completion Date

Yes

No

Describe basis for conclusion:

k	
8) 7 and Management Subrecipient Annual Report (45 days)	Yes No N/A
Discussed audit requirements for fiscal years ended to date	Yes No N/A
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=	
@	Yes No N/A
‡	
)	Yes No N/A
)	Yes No N/A
) (#) h k	Yes No N/A
) k	Yes No N/A

Describe basis for conclusion:

Program Income/Closeout Agreement

Review Program Income Records:

N/A

Program Income: Has been Received Will Be Received Not Expected

Payment Start date:

Date: Amount:

If Received, the total amount of program Income received as of:

Is program income maintained in a separate interest-bearing account?

Yes No

Discussed Closeout Agreement Requirements at Completion Date.

Yes No

The activity reported on Progress Report is correct

Yes No

Payments of Program Income are occurring on schedule

Yes No

Amount: Date:

If none received yet, amount expected to be received and when:

Is the Grantee current on all Closeout Agreement reporting requirements?

Yes No NA

Describe the basis for your conclusion:

Describe the basis for conclusion:

Review and Discuss Closeout Agreement Records for this grant and all other grants:

Discussed Closeout Agreement requirements for this grant at completion date:	Yes	No	N/A
If applicable, discussed NCDO role to manage RLF and option to assign grant to them?	Yes	No	N/A
Discussed current status on all Closeout Agreement reporting requirements?	Yes	No	N/A

Describe basis for conclusion:

- | | | |
|---|-----|----|
| B. Loans are made pursuant to a complete loan application and a positive review by a loan committee.
Basis for Conclusion: | Yes | No |
| C. Borrowers meet the low and moderate income National Objective.
Basis for Conclusion: | Yes | No |
| D. Loans are secured by enforceable documents and are perfected.
Basis for Conclusion: | Yes | No |
| E. The NCDO engages in effective servicing of the loan, performing onsite visits, etc.
Basis for Conclusion: | Yes | No |
| F. Accounting of all loan fund transactions are up to date and accurate (upload current spreadsheet in staff uploads section).
Basis for Conclusion: | Yes | No |
| G. The loan portfolio is current.
Basis for Conclusion: | Yes | No |

- | | | | |
|----|--|-----|----|
| H. | What is the percentage of delinquent loans?
Basis for Conclusion: | % | |
| I. | What is NCDO process for collecting delinquencies?
Basis for Conclusion: | Yes | No |
| J. | The loan originator(s) has completed the Statutorily mandated 20 hours of licensing education, and secured a license.
Basis for Conclusion: | Yes | No |

9. Does all Housing Rehabilitation meet Section 8 Housing Quality Standards?

Yes

No

Lump Sum Agreement

N/A

Lump Sum Amount

Date lump sum transferred to grant depository account N/A

Date lump sum transferred to lump sum escrow account N/A

Date first housing rehab loan/grant was made/obligated N/A

Was the first loan made within 45 days of the deposit? Yes No

If no, explain.

	This Period	To Date
Lump sum funds expended		

Was 25% of the lump sum amount expended, plus any interest earned, within 180 days of posting to the escrow account? F Yes No

If no, basis for conclusion.

All funds loaned? Yes No

If no, basis for conclusion.

If greater than two years, Basis for conclusion.

	This Period	To Date
Lump sum funds obligated		
Balance of lump sum funds not yet obligated		
Number of loan/grant closings		
Funds loaned by financial institution		

Describe how the Financial Institution is meeting their obligation per the Lump Sum Agreement.

Disaster Recovery Onsite Monitoring

Policies and procedures -

1. Are there written policy and procedures that govern the program? Yes No NA
2. Do the policies and procedures include management and disposition of property? Yes No NA
3. Does the program administration process capture the information required? Yes No NA

Property Buyouts

4. Did the grantee or subgrantee uniformly apply its methodology for determining purchase values? Yes No NA
5. Are any CDBG-DR funds matched to FEMA Section 404 Hazard Mitigation Grant Program funds? Yes No NA

If yes:

- a. Are these properties dedicated and maintained in perpetuity for a use that is compatible with open space, recreational, or wetlands management practices? Yes No NA
 - b. Have deed restrictions or covenant running with the land been executed to ensure the properties comply with open space, recreational, or wetlands management practices? Yes No NA
 - c. Are there deed restrictions on the properties to ensure that no new structure may be erected on a buyout property (with minor exceptions)? Yes No NA
6. Is there demonstrated impact (written and/or photo documentation) from the disaster or proof of loss?
Yes No NA

Eligibility –

7. Are reviewed activities related to the impact of the applicable natural disaster? Yes No NA
8. Is the national objective adequately documented in the files? Yes No NA
9. Is there source documentation for income verification? Yes No NA
10. Has the grantee obtained source documentation for income verification for determining national objectives?
Yes No NA
11. Business assistance projects, adequate underwriting for award? Yes No NA
12. How are jobs by income counted, wages per job or household of one? Yes No NA

Duplication of Benefits –

13. Policies and procedures in place to identify and consider all sources of disaster assistance to prevent a duplication of benefits (DOB) for both grantee and subgrantee? *For infrastructure projects, municipalities will also need to sign a Subrogation Agreement.* Yes No NA
14. If a DOB occurred, is grantee actively seeking recapture of those funds? Yes No NA
15. Are there policies and procedures governing recapture? Yes No NA

Progress Reporting –

16. Are activities classified correctly in progress reports? Yes No NA
17. Are performance measures and beneficiaries appropriate for reviewed activities? Yes No NA

18. Are performance measures, as well as projected end dates, reflected in progress reports? Yes No NA

19. Is project on schedule for completion by stated completion date? Yes No NA

Floodplain and Insurance –

20. Is reviewed activity located in an area delineated as a special flood hazard area according to FEMA's most current flood advisory maps? Yes No NA

If yes,

- a. Activity is designed or modified to minimize harm to or within the floodplain? Yes No NA
- b. If funds were provided in a flood disaster area and were used to make a payment (including any loan assistance payment) to a person for repair, replacement, or restoration for flood damage to any personal, residential, or commercial property where the person previously received Federal flood disaster assistance conditioned on obtaining and maintaining flood insurance, did the grantee confirm that the person receive in the payment had maintained the required flood insurance on the property?
Yes No NA
- c. Has the grantee has set up a process for ongoing monitoring and review to ensure subgrantees have current flood insurance policies? Yes No NA

CDBG-DR(2) ONLY

Contract Reporting

Are DR2 Grantees/Subgrantees/Borrowers current on reporting ALL contracts? Yes No NA