| **Guide for Review of ESG Recipient’s Overall Grant Management** | | | |
| --- | --- | --- | --- |
| **Name of Recipient:** | | | |
| **Names of All Subrecipient(s):** | | | |
| **Staff Consulted:** | | | |
| **Name(s) of Reviewer(s)** |  | **Date** |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, HUD must select “NO” in response to the question and make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to assess the recipient’s compliance with overall grant management requirements of the Emergency Solutions Grants (ESG) program. DOH reviewers should use a combination of the information in program files and recipient staff interviews to answer the questions below. The Exhibit is divided into eight sections: Grants Management and Oversight; Systems Coordination Requirements; Recordkeeping; Homeless Management Information System (HMIS); Other ESG-Specific Requirements; Administrative Costs; Financial Management; and Other Federal Requirements.

As previously noted, the ESG rule at 24 CFR part 576 generally incorporates the uniform administrative requirements, cost principles, and audit requirements, which were recently revised and codified at 2 CFR part 200. This Exhibit contains both questions to monitor compliance with 2 CFR part 200 and questions to monitor compliance with the former uniform administrative requirements, cost principles, and audit requirements (i.e., 24 CFR parts 84 and 85 (2013), 2 CFR 225 and 230 (2013), OMB Circular A-133). For HUD’s expectations on monitoring for compliance with the uniform administrative requirements, cost principles, and audit requirements during this period of transition to 2 CFR part 200, please see HUD’s April 13, 2016, notice CPD-16-04 (<http://portal.hud.gov/hudportal/documents/huddoc?id=16-04cpdn.pdf>).

The DOH reviewer may supplement this Exhibit with Exhibit 28-9 (covering the procurement requirements in 24 CFR parts 85 and 84) and Exhibit 34-3 (covering the procurement requirements in 2 CFR part 200), as appropriate.

Where ESG funds were used for rental assistance or services, the DOH reviewer may complete the applicable Exhibits in Chapter 24 of this Handbook, *Lead-Based Paint Compliance*. NOTE: See Exhibit 24-2 (Services), Exhibit 24-3 (Tenant-Based Rental Assistance), or Exhibit 24-4 (Project-Based Rental Assistance).

**Questions:**

A. GRANT MANAGEMENT AND OVERSIGHT

1.

| Draw Down and Expenditure Rate: Do the subrecipient’s records document that the subrecipient drew down and expended funds from each year’s grant at least once during each quarter of the program year?  [24 CFR 576.203(b); 24 CFR 576.500(u)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

2.

| Expenditure Requirement: Do the subrecipient’s records document that the recipient expended 100% of the grant for eligible costs within the performance period of the signed DOH grant agreement?  [24 CFR 576.203(b); 24 CFR 576.500(u)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

B. SYSTEMS COORDINATION REQUIREMENTS

3.

| Coordination with Other Targeted Homeless Services: Did the subrecipient coordinate and integrate, to the maximum extent practicable, ESG-funded activities with the programs, including those listed under 24 CFR 576.400(b), that are targeted to homeless people in the geographic area covered by the CoC or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area?  [24 CFR 576.400(b)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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4.

| System and Program Coordination with Mainstream Resources: Do the records document that the subrecipient coordinated and integrated, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which homeless and at-risk of homelessness persons might be eligible?  [24 CFR 576.400(c); 24 CFR 576.500(m)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

5.

| Use of the Coordinated Assessment System: Does the documentation show that each ESG-funded program or project within the CoC’s area (except for victim service providers that opt out) is participating in the CoC’s coordinated assessment system?  **NOTE**: ESG-funded victim service providers may choose not to use the CoC’s coordinated assessment system.  [24 CFR 576.400(d); 24 CFR 576.500(g)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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6.

| Coordinated Assessment (Consistency with Written Standards): If the CoC has established a coordinated assessment system:   1. did the subrecipient work with the CoC to ensure that the screening, assessment, and referral of program applicants are consistent with the ESG written standards required under 24 CFR 576.400(e); and 2. if the system meets HUD requirements, were all initial evaluations conducted in accordance with the coordinated assessment system requirements?   [24 CFR 576.400(d); 24 CFR 576.401(a)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

7.

| Establishing Written Standards (States): Did the subrecipient establish and consistently apply, or ensure that its subrecipients established and consistently applied, written standards for providing ESG assistance to all program participants?  [24 CFR 576.400(e)(2)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

8.

| Establishing Written Standards: Did the subrecipient ensure that the written standards include all of the required elements?  [24 CFR 576.400(e)(3)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

C. RECORDKEEPING

9.

| Recordkeeping (Record Retention):   1. Did the subrecipient have written policies and procedures to ensure that ESG funds are used in accordance with the requirements specified by the DOH and HUD? 2. Were sufficient records established and maintained to enable the DOH and HUD to determine whether ESG requirements are being met?   [24 CFR 576.500(a)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

10.

| Recordkeeping (Fiscal Agents): Did the subrecipient retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable?  [24 CFR 576.500(v)(1)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

11.

| Recordkeeping: If the subrecipient procured goods and services, did its records document that it did so in compliance with the requirements of the Uniform Administrative Requirements, including the codes of conduct and conflict of interest requirements, and did the recipient retain copies of all procurement contracts?  **NOTE**: The DOH reviewer may also complete the relevant procurement exhibit (as noted in instructions above) to answer this question.  [24 CFR 576.404(b); 24 CFR 85.36 or 2 CFR 200.317-200.326 (as applicable); and 24 CFR 576.500(v)(2)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

12.

| Recordkeeping (Program Participant Eligibility): Does the subrecipient have written policies and procedures in place that ensure that the recipient and/or its subrecipients are:   1. conducting an initial evaluation and re-evaluations as required, and 2. documenting eligibility in accordance with HUD requirements?   [24 CFR 576.400(e)(3); 24 CFR 576.401(a), (b), and (c); 24 CFR 576.500(a), (b), (c), and (e)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

13.

| Recordkeeping (Services and Assistance Provided): Did the subrecipient maintain records of the types of essential services, rental assistance, and housing stabilization and relocation services provided, including the amounts expended on these services and assistance?  [24 CFR 576.500(l)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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14.

| Recordkeeping (Record Retention): Did the subrecipient retain copies of the required records for the greater of 5 years or the applicable time period below:   1. for emergency shelters subject to a 10-year minimum period of use: at least 10 years from the date that ESG funds were first obligated for the major rehabilitation or conversion of the building; or 2. for program participant files: at least 5 years after the expenditure of all funds from the grant under which the program participant was served?   [24 CFR 576.500(y)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

D. HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)

15.

| Data Collection and Recordkeeping: Did the subrecipient document that it ensured that data on all persons served under ESG, under all components, and all activities assisted under ESG were entered into the applicable community-wide HMIS or, for victim services providers (and legal services providers that opt out), into a comparable database in accordance with HUD’s HMIS data standards?  **NOTE**: The subrecipient must be able to provide documentation, such as monitoring letters or HMIS reports, that document that subrecipient client-level and activity data are being entered into the applicable CoC’s HMIS (or a comparable database).  [24 CFR 576.400(f); 24 CFR 576.500(n); 2014 HMIS Data Standards] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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16.

| Eligible costs: If the subrecipient is the HMIS Lead, do records reflect that ESG funds used to pay the recipient’s HMIS costs were limited to those activities listed at 24 CFR 576.107(a)(1) and (2)?  [24 CFR 576.107(a)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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17.

| Eligible costs (HMIS): If the subrecipient is not the HMIS Lead, did the recipient use ESG funds only for costs eligible at 24 CFR 576.107(a)(1), to enable ESG projects to contribute data to the HMIS designated by the CoC, or 24 CFR 576.107(a)(3), for ESG subrecipients that are victim service providers (or legal services providers that opt out) to establish and operate a comparable database?  [24 CFR 576.107(a)(1) and (3)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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E. OTHER ESG-SPECIFIC REQUIREMENTS

18.

| Conflicts of Interest (Organizational): Does a representative sample of the subrecipient’s records reveal zero instances where:   1. any type or amount of ESG assistance was conditioned on acceptance of shelter or housing owned by the recipient, subrecipient, contractor, or any parent or subsidiary of the subrecipient or contractor; or 2. a subrecipient or contractor carried out the initial evaluation for a program participant while the individual or family was occupying housing owned by the subrecipient or contractor, or any parent or subsidiary of the subrecipient or contractor; or 3. a subrecipient or contractor administered any homelessness prevention assistance to an individual or family occupying housing owned by the subrecipient or contractor, or any parent or subsidiary of the subrecipient or contractor?   [24 CFR 576.404(a); regarding contractors, 24 CFR 576.404(c)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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19.

| Conflicts of Interest (Individual): Do the subrecipient’s records:   1. contain personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in 24 CFR 576.404(b); 2. demonstrate that the officers and staff of the subrecipient and any contractors complied with the individual conflict of interest requirements at 24 CFR 576.404(b); and 3. contain documentation supporting any exceptions to the personal conflicts of interest prohibition?   [24 CFR 576.404(b); 24 CFR 576.500(p); regarding contractors, 24 CFR 576.404(c)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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20.

| Confidentiality: Did the subrecipient have written procedures to ensure the security, privacy, and confidentiality of records as required in 24 CFR 576.500(x), including:   1. that all records containing personally identifying information of any individual or family who applies for and/or receives ESG assistance were kept secure and confidential; 2. the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG; and 3. the address or location of any program participant housing?   [24 CFR 576.500(x)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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21.

| Terminating Assistance: Did the subrecipient establish a formal process, or ensure its subrecipients established a formal process, for terminating assistance that recognizes the rights of individual being terminated?  [24 CFR 576.402] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

22.

| Homeless Participation: Did the subrecipient involve homeless individuals and families, to the maximum extent practicable:   1. in constructing, renovating, maintaining, and operating facilities assisted under ESG; 2. in providing services assisted under ESG; and 3. in providing services for occupants of facilities assisted under ESG?   **NOTE:** This involvement may include employment or volunteer services.  [24 CFR 576.405(c); 24 CFR 576.500(q)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

23.

| Did the subrecipient ensure that, in providing ESG assistance, no program participant or prospective program participant was discriminated against on the basis of religion or religious belief?  **NOTE:** To answer this question, the DOH reviewer should look at the recipient’s written policies and requirements for its subrecipients as well as a representative sample of applicant records, where the individual or family was determined ineligible for ESG assistance. Under 24 CFR 576.500(d), the recipient’s records must include documentation of the reason for each determination that an individual or family is ineligible to receive ESG assistance.  [24 CFR 576.406(d); 24 CFR 576.500(r)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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24.

| Faith-Based Activities: Does the documentation show that the subrecipient did not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG; AND if the subrecipient conducts these activities, were they offered separately, in time or location, from the programs or services funded under ESG, and was participation voluntary for all program participants?  [24 CFR 576.406(b); 24 CFR 576.500(r)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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25.

| Faith-Based Activities (Rehabilitation): Do the subrecipient’s written policies and records indicate that the subrecipient ensured that no ESG funds were used to renovate a sanctuary, chapel, or other room used as a principal place of worship?  [24 CFR 576.406(e); 24 CFR 576.500(r)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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26.

| Faith-Based Activities (Rehabilitation): If a structure is used for both eligible activities and inherently religious activities, did the subrecipient ensure that the amount of ESG funds used was limited to costs of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds?  [24 CFR 576.406(e); 24 CFR 576.500(r)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

F. ADMINISTRATIVE COSTS

27.

| Eligible activities: Does the subrecipient’s documentation show that all recipient expenses are allowable (as determined by a review of at least a sample of program component and administrative costs)?  **NOTE**: To answer this question with respect to 2 CFR 200.403, the DOH reviewer may complete Exhibit 34-2, *Guide for Review of Cost Allowability*.  [24 CFR 576.100-576.109; 24 CFR 576.500(u)(2); 24 CFR 85.22, 2 CFR 200.403] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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28.

| Training Costs: If any staff time was spent on training:  a. was it only for providing training on ESG requirements, attending HUD-sponsored ESG training, training staff on using HMIS or a comparable database, or attending HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act; and  b. was it charged to the appropriate component (only HMIS for HMIS-related training, and Administrative costs for all other training)?  [24 CFR 576.108(a)(2); 24 CFR 576.107(a)(1)(vii)(F); 24 CFR 576.107(a)(1)(viii)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

G. OTHER FEDERAL REQUIREMENTS

29.

| Drug-Free Workplace: Does the recipient have a drug-free workplace statement per the requirements of 2 CFR part 2429?  [24 CFR 5.105(d); 24 CFR 576.407(a)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
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30.

| Drug-Free Workplace: If the requirements of the Drug-Free Workplace Certification were reviewed, is the recipient in compliance?  [24 CFR 5.105(d); 24 CFR 576.407(a); 2 CFR part 2429] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

31.

| Lobbying: Were the certifications required under 24 CFR 87.110 filed by the recipient and all subrecipients and contractors that received a subgrant, contract, or subcontract exceeding $100,000 at any tier under the recipient’s grant?  [24 CFR 5.105(b); 24 CFR 87.110; 24 CFR 576.407(a); 24 CFR 576.500(s)(4)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

32.

| Lobbying: Did the each subrecipient and contractor that filed a certification also submit the appropriate disclosure forms, if and as required under24 CFR part 87?  [24 CFR 5.105(b); 24 CFR 576.407(a); 24 CFR 576.500(s)(4) and 24 CFR part 87] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

33.

| Uniform Relocation Assistance: If ESG grant funds were used to assist projects involving acquisition, demolition, or rehabilitation, has the recipient:   1. taken all reasonable steps to minimize displacement of persons; and 2. complied with all requirements in the applicable regulations; and (c) documented such compliance?   [24 CFR 576.408; 24 CFR 576.500(t)] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

34.

| Affirmative Outreach: Did the subrecipient:   * 1. make known that the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis, and establish additional procedures, as required under 24 CFR 576.407(b); and   2. take appropriate steps to ensure effective communication with persons with disabilities; and   3. take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency persons? (Use pertinent Exhibits in Chapter 22 as necessary.)   [24 CFR part 5, Subpart A; 24 CFR 576.407(b); 24 CFR 576.500(s)(1); 24 CFR 8.6] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |

35.

| Audits: Was the subrecipient in compliance with the Single Audit Act of 1984, as amended, and implementing regulations?  **NOTE**: To answer this question with respect to 2 CFR 200.501, the HUD reviewer MUST complete Exhibit 34-1, section K (“Audit Requirements”).  [24 CFR 576.407(c); 24 CFR 84.26; 24 CFR 85.26; 2 CFR 200.501] | | ☐ | ☐ | ☐ | | --- | --- | --- | | **Yes** | **No** | **N/A** | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Describe Basis for Conclusion:** | |
|  | |