



CITY OF BOULDER

DIVISION OF HOUSING

CDBG COMPLIANCE MONITORING FORM

GENERAL INFORMATION

Date of Monitoring Visit: ____/____/____

CDBG Sub-Recipient: _____

Project Name: _____

Project Address: _____

Sub-grantee Representative(s) in attendance:

Name	Title
_____	_____
_____	_____

Specific Type of Activity:

Economic Development Public Service Housing Public Facility

Contract Amount: \$ _____

Contract Period: ____/____/____ - ____/____/____

National Objective and Eligibility: (24 CFR §570.208)

- Benefit to low-income and moderate-income persons
 - Area Benefit
 - Limited Clientele Benefit
 - Job Creation or Retention
- Aid in the Prevention or Elimination of Slum or Blight
 - On a Spot Basis
 - Urgent Need

Specify Type of Assistance: Grant or Loan



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Services Provided by Subrecipient:

Scope of Project:

REPORTING REQUIREMENTS

Are quarterly or monthly reports being submitted by sub-recipients properly (on supplied forms) and in a timely fashion? Yes No

If no, explain: _____

PERFORMANCE EVALUATION

Activity Goals and Objectives as stated in statement of work: _____

Is the agency behind in their progress towards the goals identified in the Statement of Work? Yes No

If yes, please describe the goals that have not been yet and how the agency proposes to address:

How many people were projected to be served in the statement of work and how many *actually* served to date? If different, explain:

How many City of Boulder households were income eligible for services? _____

Have there been changes in key management positions at the agency/organization? Yes No

If yes, explain _____



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RECORD KEEPING (24 CFR Part §570.506 and 24 CFR Part §5.609)

Who is intended clientele of the funded activity?(handicapped, seniors, low-moderate income residents, etc.)_____

Is clientele being served? Yes No

If no, explain:_____

If sub-recipient serves low-moderate income residents, proper client records must be maintained and household income must be verified. Monitor will review at least ten percent of clients served if possible.

How many files were reviewed, specify number_____.

Is sub-recipient relying on current HUD Income Limits dated: _____

Yes No

Identify the sample types of income documentation examined in each client file reviewed (e.g., 1040s, W-2s, current pay-stubs for a three-month, etc.) examined:

1. _____
2. _____
3. _____

Do records contain other required client information (names, addresses, gender, etc.)?

Yes No

Are records sufficient in terms of identifying clients and including appropriate income information and were the reviewed applicants eligible for services as required applicants review?

Yes No

If no, explain:_____

Is there a system for identifying "New" unduplicated clients as compared to duplicated clients?

Yes No

If no, explain steps sub-grantee will take to establish such a system: _____



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FAIR HOUSING AND EQUAL OPPORTUNITY

(24 CFR Part §570.904 and §570.601(b))

Have any fair housing concerns been filed against the agency? Yes No

If so, what is the current status of the concern of complaint: _____

If applicable, is the fair housing logo displayed in program materials? Yes No

Is there evidence of discrimination in any CDBG-assisted programs? Yes No

If so, please explain the nature and type of discrimination observed:

What action will be taken if there is discrimination observed: _____

Is there evidence that the agency is providing appropriate services for Non-English speaking clients (translation services such as Language Line, translated application forms/program materials, etc)? Yes No

CIVIL RIGHTS

(24 CFR Part §570.506,601 and 602)

Review the agency's employment application. Does the agency ask if the applicant has a disability? Yes No

Do all persons have equal access to information related to this project? Yes No

Has there been a formal finding of discrimination filed against the agency? Yes No

Does the organization have policies/procedures to address personnel complaints? Yes No

Is the Equal Employment Opportunity Clause included in the construction contract as required? Yes No

Are EEO Posters utilized? Yes No

SECTION 3

If applicable, is the organization correctly maintaining Section 3 Information? (12 USC 1701, Housing and Urban Development Act, and 24 CFR 135 requiring that to the greatest extent feasible opportunities for training and employment will be given to



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lower income residents of the project area and contracts for work in connection with the project will be awarded to businesses located in or owned in substantial part by persons residing in the areas of the project.” (Other related requirements – see Contract-including sending labor organizations or worker representatives with which the sub-recipient has a collective bargaining agreement or contract a notice advising such organization or worker rep of its commitment under Section 3.)

Has the project created training and or economic opportunities for Section 3 residents? Yes No

Were Section 3 businesses or contractors utilized for this project? Yes No

UNIFORM RELOCATION ACT (URA)

Is the project subject to URA? Yes No

Was the owner given notice of URA entitlement? Yes No NA

Did owner waive rights by signing appropriate waiver form? Yes No NA

Were URA requirements met? Yes No NA

RECORDKEEPING AND DOCUMENTATION

The contract signed between the City and the sub-grantee specifies that records documents be maintained including:

- Description of activities to be taken;
- Information indicating that a National Objectives is being met by the activities conducted
- Eligibility information demonstrating eligibility of activities
- Documents on use of CDBG funds for acquisition/improvement/use/disposition of real property;
- Documents showing compliance with fair housing, affirmative action; equal opportunity requirement;
- Financial records; and
- Other records (per Subpart K; 24 CFR 570): labor, environmental standards.

National Flood Insurance; displacement/relocation/acquisition/replacement of housing; employment/contracting opportunities; lead-based paint; cost principles, conflict of interest.

Are applicable records kept? Yes No

Identify records/documents not being maintained as required, and why not:



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Will records be maintained for five years after termination of activities funded under this agreement, as specified in the agreement? Yes No

FINANCIAL INFORMATION: (24 CFR Part §85.20)

Has the subrecipient expended \$500,000 or more in combined Federal awards in the fiscal year? If yes, have the requirements of OMB Circular A-133 been met?

[OMB Circular A-133 and 24 CFR 570.502(a)(7)] Yes No

Does sub-grantee have a current audit (FY _____) including a management letter available for review? Yes No

If not, explain:

Are there any outstanding audit issues? Yes No

If yes, explain and describe how issues will be resolved:

Does the agency have written procedures for approving and recording transactions? Yes No

Is there a separation of functions? Yes No

Does the agency have the components of a financial management system including a chart of accounts, general ledgers, reconciliation, etc.? Yes No

Is the sub-recipient administering the program in accordance with uniform administrative requirements? (“Yes” unless an auditor has found to the contrary). Yes No

Is the project operating within the approved budget? Yes No

Balance in account at time of monitoring visit_____.



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Is the balance consistent with sub-grantee records? Yes No
(If not, why not? _____)

Are the reimbursement requests submitted to the City supported by adequate documentation (time sheets if salary; invoices if supply or equipment purchased, etc.)? Yes No

Does the project have program income? Yes No

If yes, is income reported to the City? Yes No

Is there any evidence of cash flow problems? Yes No
If Yes, explain:

Have any disallowable costs been incurred?

- Entertainment Yes No
- Cost related to political activities Yes No
- Cost related to religious activities Yes No
- Contributions/donations Yes No
- Fines & Penalties Yes No

Are there any obvious instances of unnecessary or unreasonable expenditures?

- Salaries Yes No
- Administrative Services or Cost Yes No
- Travel Yes No
- Entertainment Yes No

Has the agency purchased any personal property with CDBG funds (over \$250)? Yes No



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If any portion of a salary is paid with CDBG funding, is there any evidence of payment for time spent on other than the CDBG activity funded? Yes No

PROGRAM INCOME

Does the contract with the sub-recipient specify whether the agency can retain or return program income? Yes No
(If no, staff will need to amend the contract with the agency)

Is the agency/program generating program income? Yes No
(If not applicable, skip this section)

Program income is defined as gross income received by a sub-recipient directly generated from the use of CDBG fund. Examples of program income include proceeds from the disposition by sale or long-term lease of real property purchased or improved with CDBG funds, proceeds from the disposition of equipment purchased with CDBG funds, gross income from the use or rental of real or personal property acquired by the recipient or by a sub-recipient with CDBG funds, less costs incidental to generation of the income.

Is the agency allowed to retain or return program income? RETAIN RETURN

If the agency is retaining program income, is the agency regularly and accurately reporting how much program income is being earned? Yes No

Is the agency using program income for eligible CDBG activities? Yes No

Does the agency/program have a revolving loan fund established with program income? Yes No

Is the agency using program income funds on hand before making a request for reimbursement with additional CDBG grant funds? Yes No

Comments:

ENVIRONMENTAL REVIEW

What is the level of review required for this project:

- Exempt Categorically Excluded Not Subject to 24 CFR
 Categorically Excluded Subject to 24 CFR Environmental Assessment



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Was a Combined Notice and evidence of Publication required and on file? Yes No

Was a Release of Funds required: Yes No

If yes, date of RROF: _____

Was there evidence that any funds were obligated prior to the Release of Funds?
 Yes No

For Housing Rehab & Economic Development Projects only: Does the project file
contain individual environmental review records for each home/residence or business
assisted with CDBG? Yes No

DAVIS BACON COMPLIANCE

Is this project subject to Davis-Bacon regulations? Yes No

Was Contractor listed on the debarred contractors or
Excluded Parties list? Yes No NA

Was a wage determination provided? Yes No NA

Is determination on file? Yes No NA
If yes, Date: _____

Date of pre-construction meeting? _____

Were certified payroll reports' submitted as required? Yes No NA

Was a HUD-11 Labor Interview completed: Yes No NA
If yes, Date: _____

Is project in compliance with Davis-Bacon requirements? Yes No NA

If not in compliance, state deficiencies and measures needed to correct:



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PROJECT INSPECTIONS

Does the project file contain documentation of project inspections? Yes No

Were any problems or deficiencies observed? Yes No

Were problems or deficiencies reported? Yes No

Were problems or deficiencies resolved in a timely manner? Yes No

If not in compliance, state deficiencies and measures needed to correct:

PROCUREMENT INFORMATION

◆ Has any of the work done under this program been contracted out? Yes No

◆ If over 50,000, was item put out to formal bid? (25,000 informal bid) Yes No

◆ Are price/rate quotations obtained from an adequate number of qualified sources?
 Yes No

◆ If applicable, did the agency utilize the Department of Labor's list of Disadvantaged
Enterprises? Yes No

ORGANIZATION INFORMATION:

Employees and Board Member Records:

◆ Identify employees working on this activity, verifying that time logs are maintained and
correspond with the hours claimed. Yes No NA

Are employees' activity time logs current? Yes No NA

Are there any staffing issues? Yes No NA

Are there staff turnover concerns? Yes No NA

Are employees' taxes paid? Yes No NA



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Is there any evidence of nepotism or conflicts of interest? Yes No NA

Were any board members / employees assisted under this? Yes No NA
If so, list board members assisted:

If yes, was a public notice filed? Yes No NA

If not, was an exception from HUD granted? Yes No NA

MONITORING SUMMARY:

Issues encountered:

Were there any concerns identified in the monitoring? Yes No
[A concern is a matter which, if not properly addressed, can become a finding and can result in sanctions]

Were there any findings identified in the monitoring? Yes No
[A finding is a violation of law or regulations which can result in a sanction]

Does the agency need any technical assistance Yes No
If so, what are the identified areas?

Monitor Name/Title: _____

Monitor Signature: _____ Date: _____

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