

**Division of investment ready communities**

**community development block grant program**

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**COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)**

**FOR MID-PROJECT AND CLOSE OUT**

**PROJECT ADMINISTRATION AND MONITORING MANUAL**

Name of Grantee:

Name of Sub-Grantee (if applicable):

Name of Project:

Location of Project:

Grant Amount:

Grant Year Awarded (GY):

50% construction cost amount (mid-project)\_\_\_\_\_\_\_\_ Close Out \_\_\_\_\_\_\_\_\_\_\_\_

Type of Project:

Date Monitored:

Monitored By (Include All Staff Present):

Project Contact Person:

The Wyoming Business Council (WBC), as a program administrator, is responsible for grantee review and assuring compliance with all applicable Federal, State and local laws, to ensure that a project is being completed in a timely fashion, the that project is achieving stated goals and objectives, and that grantees are maintaining orderly records to substantiate their compliance.

It is the goal of the WBC staff to foster open communication and mutual cooperation with our grantees. Any questions or comments regarding monitoring procedures or requirements should be directed to the WBC using the contact information on the cover page.

The purpose of this manual is to guide you through the process. It offers checklists of items that need to occur and be on file. During monitoring, the WBC will verify the completeness of the files.

**What grantees should be aware of**- The WBC is available to help clarify information or requirements at any stage of the process.

* **Financial Systems**
	+ There must be financial management procedures and requirements.
	+ Financial systems must be established, effective and maintained.
	+ Financial records and files must be complete and retained for a period of time.
	+ Compliance with federal procurement regulation as stated in Uniforam Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, 2 CFR Part 200, for any grantee that received over $750,000 in federal funds in a fiscal year. Audits or a statement of exemption are required for every fiscal year in which grant funds were drawn.
* **Program Income**
	+ Will there be program income as a result of this project?
	+ If the project has or will create program income, Grantee must have a separate, non-interest bearing account in which funds will be deposited,
	+ Program income will be reported periodically on quarterly and annual reports, including the amount, source, tracking methods, and how the income has been/will be used.
	+ Some or all income attributable to the grant funds distributed under this Agreement may be used to continue the activity from which it was generated.. For additional guidance, visit:: <http://portal.hud.gov/hudportal/documents/>huddoc?id=DOC\_16361.pdf
* **Labor Standards**
	+ There are several labor standards, regulations and requirements. Information is posted on the CDBG section of the WBC website.
	+ There must be procedures for monitoring and ensuring compliance with labor standards.
	+ There must be resources sufficient to develop contract solicitations and contracts.
	+ There must be file documentation for all labor standard activities
	+ Contractors must be checked in the SAM system (also known as the EPLS or debarred list) to insure they are in good standing and eligible to work on projects that involve federal funding. Contractors are responsible for checking the status of subcontractors they hire.
* **Environmental Requirements**
	+ There are many environmental regulations and requirements. Information is posted on the CDBG section of the WBC website.
	+ There must be local procedures for meeting environmental responsibilities.
	+ There must be resources available to develop notices, assessments, reviews, records, statements and other tools and instruments.
	+ There must be environmental review records to document all environmental activities.
* **Civil Rights**
	+ There are many civil rights laws, regulations and requirements. The project must be carried out in compliance with these regulations. Information is posted on the CDBG section of the WBC website. Requirements include:
		- Section 504 (ADA Requirements)
		- Specific provisions for employment and contracting
		- Specific provisions for displacement and relocation
		- Specific provisions for housing

**Types of Monitoring**-There are two levels of monitoring conducted by the WBC:

* **Desk Monitoring** includes review of quarterly reports and draw requests, providing Davis-Bacon wage determinations, review of bid documents, checking vendors against the Excluded Parties List System and other procedures Desk monitoring also involves reviewing plans and other reports for consistency with the purpose of the grant before the final payment is made. Desk monitoring involves those items that can be done through electronic media, fax or mail. Regular and on-going phone or email conversations are also important for staff to understand the progress of a project and to provide advice and guidance to grantees.
* **Mid-Project Monitoring** involves WBC staff visiting the actual project site during the construction period. The site visit will allow staff to review records kept by the grantee, verify the progress of a project, and ensure that records maintained by the grantee are in compliance with the CDBG program.
* **Close-out monitoring** involves the WBC staff visiting the actual project site and meeting with representatives of the grantee and sub-grantee to perform a review of the grantees’ records, verifying the project is on track to meet the desired/projected results, and providing any technical assistance.

**When monitoring will occur**

* **Desk monitoring** will occur throughout the duration of the project. With regard to planning and technical assistance grants, the final 25% of the grant will be disbursed only after a final draft plan or product has been reviewed by the WBC, or when WBC staff makes the determination through other communications or reports that sufficient progress has been made and a final product is imminent and will meet the intended goals. If the WBC determines that the draft project does not adequately address the purpose of the original request, then that will be communicated to the grantee within 2 weeks of the receipt of the draft. Once the final product is reviewed and is deemed to meet the original intent of the grant, the project will be closed conditionally if there are pending items such as 2 CFR Part 200 audits. The project will be closed unconditionally if there are no pending items. The close-out letter will state the length of time records must be kept and the official date when the project is unconditionally closed.
* **Mid-project monitoring** visits will occur during the construction period and will be triggered when no less than 50% of the project’s construction budget has been requested. Draws beyond 50% of the project cost will not be processed until a mid-project monitoring has been scheduled. The grantee may also request a mid-project monitoring to discuss any aspects of the project or program requirements.
* **Close-out monitoring** All infrastructure related projects will go through a close-out monitoring within 3 months of the final grant payment. Upon the final payment, WBC staff will send a letter providing suggested dates for the monitoring and an overview of what to expect. If the scheduling cannot occur within that 3-month time frame, then it will be scheduled at the earliest convenient time. When on-site monitoring is necessary, a date that is mutually acceptable will be determined, and the grantee will be notified if any portions of this monitoring booklet are not applicable; however, in most cases the grantee is responsible for compliance for everything included herein. On a mutually agreed upon date, WBC staff will visit the site and review project files. An exit interview will be conducted informing the grantee of any findings or deficiencies.

**What to expect during monitoring**

* WBC staff will visit the project site, take pictures, and ensure that the project is completed to a reasonable percentage (mid-project) or that what was paid for is what was built or installed (close-out).
* The WBC will review files and use the accompanying checklist to verify that requirements have been met and that recordkeeping is complete.
* An exit interview will be conducted.
* Within 30 days of a monitoring (mid-project or close-out), staff will provide a letter indicating the results of the monitoring. If there are compliance issues, staff will provide guidance to remedy the situation and a deadline by which corrections should occur or further draws will be halted until compliance issues are resolved.
	+ For a mid-project monitoring, the WBC will provide technical assistance and guidance to aid the grantee in the successful completion of the project. If there are any corrective actions that should be taken, they will be provided along with a timeline for making the corrections and information on what documentation will be required to verify that the correction has been made.
	+ Corrective actions may include:
		- Immediately terminating the grant agreement without further liability or obligation of the WBC
		- Issuing a letter of warning advising the grantee of the deficiency and putting the grantee on notice that additional action will be taken if the deficiency is not corrected or is repeated
		- Recommending or requesting grantee to submit proposals for corrective actions including the correction or removal of the causes of the deficiency
		- Advising grantee that a certification will no longer be acceptable and that additional assurances will be required in such form and detail as WBC and HUD may require
		- Advising grantee to suspend disbursement of funds for the deficient activity
		- Advising grantee to reimburse any amounts improperly expended and reprogram the use of funds in accordance with applicable requirements
		- Changing the method of payment to grantee
		- Reducing, withdrawing or adjusting the amount of the grant
		- Taking enforcement action as described in 2 CFR Part 200.338
	+ **Conditional close-out** for a completed project will be issued when:
		- A grantee must still provide information (such as 2 CFR Part 200 audit or if the project still requires sufficient time to realize the benefits projected, such as job creation).
		- A grantee must act on correcting a finding (taking some type of action or providing documentation of a corrective action)
		- If compliance issues are not able to be addressed, Wyoming may require repayment of funds.

A conditional close-out letter will provide the grantee with a checklist of those items

required and the time frame by which the additional items must be completed in order

to close the project unconditionally.

* **Unconditional close-out** will occur when all terms of the grant have been met, all required documentation is completed and all monitoring findings (if any) have been mitigated. The letter will state the length of time records must be kept and an official date when the project is unconditionally closed.

**Application and Grant Agreement**

1. Does the grantee possess files that contain

a copy of the CDBG application and

all relevant supplemental materials? (surveys,

map of project area, etc.) Yes No N/A

2. Documentation of TWO public notices, the Dates of Public Notice

 first held prior to submitting the application,

 the second before the final payment was made. ­­­­­­­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 (a copy of notice and affidavit of publication)

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Were there public comments? If so, please summarize.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Did the public input shape the project in a way that was different than the project was intended?\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Was a grant agreement executed with the

WBC within a reasonable time (6 months)

after the date of the announcement of the

grant award? Yes No N/A

Date of award: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date of grant agreement:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Did the grantee submit an acceptable project

management plan and implementation schedule? Yes No N/A

 Was this adhered to? If not, what are the reasons?

1. Has the grantee initiated contracts/collateral

agreements/security agreements with their

sub-grantee? Yes No N/A

Copies in files? Yes No N/A

1. Eligible Activities
2. Are project activities being carried out

in the same manner as proposed in the

original CDBG application? If no, explain

how they are different and whether this effects

their eligibility. Yes No N/A

1. Are the project activities being

carried out in the same geographic

area as proposed in the original CDBG

application or as subsequently approved

by the WBC? Yes No N/A

1. Were all changes in budget expenditures

and project activities approved by WBC

in advance? Yes No N/A

**Accounting Systems**

1. Were generally accepted municipal

fiscal procedures followed? Yes No N/A

1. Which individuals validate/authorize

claims for payment (as Dept. Head)?

1. Does someone compare expenditures

against budgeted line items in order to

control overspending on the authorized

budget? Yes No N/A

1. Which individuals prepare warrants

(write checks)?

1. Does there appear to be sufficient

separation of duties to ensure adequate

internal control? Yes No N/A

1. Were CDBG transactions supported by

original source documents? Yes No N/A

7. Will the project generate program income? Yes No N/A

 What is the projected amount?

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Drawdown of CDBG Funds**

1. Is there a file containing copies of

drawdown requests, receipts and

quarterly reports? Yes No N/A

Notes:

**Procurement Procedures**

(Note: Please be sure to reference the Conflict of Interest information in your grant agreement as it applies to contracting)

1. Procurement Procedure Used
2. Purchases less than $100,000 (Small Purchases): Yes No N/A
3. Were price quotes obtained from more

than one qualified source? Yes No N/A

1. Competitive Seal Bid
2. Were competitive bids obtained through

formal advertising for all publicly contracted

construction in compliance with

24 CFR, Part 85? Yes No N/A

1. Competitive Negotiation
2. Was competitive negotiation appropriate

for the good or service being procured? Yes No N/A

1. Were proposals requested from at least

two qualified sources? Yes No N/A

1. Did the RFP clearly and accurately

identify all the major factors that were

used to evaluate the responses and their

relative weight in the selection? Yes No N/A

1. Did the grantee adequately publicize

the RFP and honor reasonable requests

to submit responses to the RFP? Yes No N/A

1. Were all responses evaluated according

to the written criteria established in advance? Yes No N/A

1. Were negotiations conducted with more than

one of the responding firms or people before

the selection was made? Yes No N/A

1. Were bid instructions clear that bidders must

provide evidence of SAM registration and good

standing? Yes No

 h. Did the grantee provide documentation the

selected firm’s SAM registration and good

standing was verified before entering into

an agreement? Yes No N/A

Were they approved to work on the project? Yes No

Are they still eligible?

DATE that SAM registration and standing was checked for mid-monitoring:

Notes – type of documentation? Files reviewed?\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Non-competitive Negotiation (Sole Source)
2. Which of the following situations apply?

[ ] After solicitation from a number of

 sources, competition was determined to

 be adequate.

[ ] The items or services required were

 available only from one.

**Construction Procedures**

* Architectural Services \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Engineering Services \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Construction Manager At-Risk \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
* Construction Company \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
1. Were methods used to select services in

compliance with Part 85? Yes No N/A

1. Are there copies of the contracts between

the city/town/county and those providing

professional services? Yes No N/A

1. Are there copies of letters of solicitation

and of public hearings in the file? Yes No N/A

1. Which of the following types of bonds were

used by the contractor

[ ] Bid Bond

[ ] Performance Bond

[ ] Payment Bond

[ ] Applicable Letter of Credit

1. Is there documentation of bid awards (bid

award tabulation sheet)? Yes No N/A

1. Is there adequate documentation of the following:
2. Copies of notice to proceed Yes No N/A
3. Copies of permits and licenses Yes No N/A
4. Drawdown requests from the contractor Yes No N/A
5. Copies of change orders Yes No N/A
6. Copies of construction inspections Yes No N/A
7. Copies of lien waivers Yes No N/A
8. Final inspection and/or project Yes No N/A
9. Acceptance agreement Yes No N/A

Notes:

**National Objectives**

**Low and moderate income benefit (LMI)**

1. What was the benefit to low and

moderate income (LMI) persons

claimed in the application? \_\_\_\_\_\_\_\_%

1. What methodology was used to

determine LMI benefit in the

application?

[ ] Latest census date

[ ] Local survey

[ ] Educational requirements/income

 limits for potential jobs

[ ] Income date received on individuals

 prior to receiving services

1. Is the grantee’s data verifiable? Yes No N/A

(explain the method of verification)

1. Does the survey data match up with

the project area? Yes No N/A

Notes:

**Slums and Blight**

1. Does evidence exist in the file that

supports the state definition of slums

and blight? Yes No N/A

1. Is there a map that defines the

boundaries of the area? Yes No N/A

1. Is there a building inventory consisting

of all the structures in the area with a

list of characteristics that qualify at

least 25% of the total of slums and blight? Yes No N/A

1. If the rehabilitation activity is for a

structure not in a slum or blighted area,

were the activities directed only to the

elimination of the threats to public health

and safety? Yes No N/A

Notes:

**Emergency Community Development Needs**

1. Is there documentation concerning the nature

and degree of seriousness of the condition

requiring assistance? Yes No N/A

1. Is there evidence that the recipient has

certified the CDBG activity will address

the emergency need? Yes No N/A

1. Is there sufficient information to determine

that the urgent need developed in the last

eighteen months? Yes No N/A

1. Is there evidence that confirms other

financial resources were unavailable to

alleviate the condition? Yes No N/A

Notes:

**PROJECT REVIEW OF RECIPIENTS**

Comments on Concerns in Recipients Project Management System

Suggested Corrective Actions Timetable

Follow-up Contacts

What audits are required for this project (FY during which drawdowns occurred)?

If the grantee did not receive $750,000 during any one fiscal year in which the project received funds, have they completed a statement of exemption?

Are there any findings or other concerns with the auditors?

**Audit Standards Review of Recipients**

Comments on Concerns in Recipient’s Audit Standards System

Suggested Corrective Actions and Timetable

Follow-up Contacts

**Labor Standards Review**

Note: This checklist is completed for recipients with

construction contracts subject to labor standards

**Wage Rate Determinations and Contractual Provisions**

1. Were wage rate determinations requested? Yes No N/A

What was the wage decision

1. Were wage rates included in the solicitation

specifications? Yes No N/A

1. Were wage rates checked and updated prior

to contract award? Yes No N/A

Lock in date?

1. Were all required labor standards provisions

included in solicitations and contracts? Yes No N/A

**Recipient Monitoring/Enforcement of Compliance**

1. Is there a file and documentation of contractors

and pre-construction conference? Yes No N/A

What documentation?

1. Were weekly payrolls received from

all contractors and sub-contractors? Yes No N/A

1. Were weekly payrolls properly approved

by the company owner or designee? Yes No N/A

1. Who approved?
2. Which payrolls where checked?
3. Were they accurate? Yes No N/A
4. If not, what were the issues?
5. Did compliance investigations include:
6. Checking for posted wage-rate determinations

and the Davis/Bacon poster? Yes No N/A

1. Checking the contractor’s/sub-contractor’s

payroll files? Yes No N/A

1. Conducting worker interviews? Yes No N/A
2. Reviewing the certifications of apprentices, trainees

and helpers? Yes No N/A

**Review the Actions taken by Recipients to Investigate and Follow-up**

 **on Violations**

1. Were investigations conducted in a timely manner? Yes No N/A
2. Were records and documentation sufficient

 to support the finding? Yes No N/A

1. Were appropriate cases referred to WBC? Yes No N/A
2. Who did the Davis Bacon compliance monitoring?

Notes:

**Labor Standards Review of Recipients**

Comments on Concerns in Recipient’s Labor Standards System

Suggested Corrective Actions and Timetable

Follow-Up Contacts

**Environmental Review**

**Environmental Review Record**

1. Is there an Environmental Review Record? Yes No N/A
2. Is the Environmental Review Record available

for public perusal? Yes No N/A

1. Does the Environmental Review Record document the

 Environmental Review Process including:

* 1. Coordination with other city/county agencies? Yes No N/A
	2. Assessment of effects? Yes No N/A
	3. Public notices? Yes No N/A
	4. Determination and findings? Yes No N/A
	5. Impacts? Yes No N/A
1. What was the determination?

[ ] Exemption

[ ] Categorical Exclusion

[ ] FONSI

[ ] Need for additional review? EIS? Yes No N/A

1. Is there a Statutory Checklist? Yes No N/A
2. Who signed and dated the forms as the Certifying Officer?
3. Is there evidence on site and/or in the file that

the grantee has complied with all applicable

regulations and agencies listed on the

Statutory Checklist and/or Environmental Checklist? Yes No N/A

1. Is there evidence of compliance with requirements

concerning the use and removal of lead-based paint? Yes No N/A

**Environmental Assessment**

1. Were the recipient’s activities coordinated

with those of any other Federal or State agency

responsible for implementing applicable laws? Yes No N/A

1. Was the environmental process described, including:
2. Project Data? Yes No N/A
3. Environmental impacts Yes No N/A
4. Alternatives Considered? Yes No N/A
5. Mitigation? Yes No N/A
6. Findings? Yes No N/A
7. Were any historic (or potentially historic)

structures or archeological sites involved? Yes No N/A

1. Was the State Historic Preservation Office

(SHPO) notified? Yes No N/A

**Publication and Public Comments**

1. Was a Notice of Finding of No Significant

 Impact (FONSI) published? Yes No N/A

1. Was a notice of Intent to Request Release

of Funds (NOI/REF) published? Yes No N/A

1. Was the FONSI Notice and/or NOI/RRF sent to:
2. Interested individuals and groups? Yes No N/A
3. Appropriate local, federal, and

state agencies? Yes No N/A

1. A general circulation section of a

newspaper? Yes No N/A

1. Local Post Office and substations? Yes No N/A
2. Is there documentation in the Environmental

Review Record of the 15-day minimum time

period for public comment on the Notice to

Request Release of Funds? Yes No N/A

1. Is there a public comment or complaint file? Yes No N/A
2. If any complaints or public comments are in the

file, were they addressed? Yes No N/A

**Project Changes of Alterations**

1. Were there substantial changes in the magnitude or

extent of the project and were they assessed? Yes No N/A

1. Were there new circumstances that may have

affected the project and were they assessed? Yes No N/A

1. Was an alternative approach to the original

environmental assessment selected for the revised

assessment? Yes No N/A

**Actions taken by Recipients to Request Funds Certification**

1. Was the Request for Release of Funds (RROF) and

accompanying certification completed on the required

forms? Yes No N/A

1. Who signed and dated the RROF as the Certifying

officer? Yes No N/A

1. Is there a copy of WBC’s letter in the ERR stating

that all environmental requirements have been met,

as well as establishing the date costs can be incurred? Yes No N/A

1. Were all costs incurred after the date established or

the Release of Funds letter was sent by WBC to the

grantee? Yes No N/A

**Environmental Review of Recipients**

Comments on Concerns in Recipient’s Environmental Review System

Suggested Corrective Actions and Timetable

Follow-Up Contacts

**Civil Rights**

**Checklist**

A suggested technical assistance checklist for reviewing recipient compliance with civil rights laws in its employment practices and in the provision of program benefits.

Civil Rights Laws are designed to prohibit discrimination on the basis of:

Race Sex Sexual Orientation

National Origin Age (40 & Over) Gender Identity

Religion Handicap Veteran Status

Color Familial Status (Except Sr. Housing) Genetic Information

**Administration**

1. Does grantee have a separate Civil Rights File? Yes No N/A
2. Does this CDBG recipient have a civil rights

dept., division, or agent within its structure which is

required by law to address civil rights issues? Yes No N/A

1. Does this CDBG recipient have a Housing and

Community Development Plan? Yes No N/A

1. Does the plan identify the needs of protected groups? Yes No N/A
2. Which activities have been undertaken to affirmatively

further Fair Housing?

1. Doe these policies and practices comply with or

supplement Federal Fair Housing, Equal Opportunity, and

other applicable Civil Rights Laws? Yes No N/A

1. Does this CDBG project address the needs of protected

groups? Yes No N/A

1. Which groups?
2. Does this CDBG project address those needs Yes No N/A

without exclusions or restrictions?

1. Is there demographic or census data or other

acceptable table data available to document the

characteristics of the protected groups? Yes No N/A

1. Is there a file containing all public notices? Yes No N/A
2. Were all public notices published in accordance

with CDBG procedures and civil rights laws? Yes No N/A

1. Has the grantee received any complaints

involving civil rights issues? Yes No N/A

1. Were the complaints handled according to

civil rights laws? Yes No N/A

1. Has the grantee developed any working

relationships with any civil rights groups

in the area? Yes No N/A

1. List the groups:

**Housing**

1. Does the city/town/county have an overall

housing development plan? Yes No N/A

1. Does this plan address short and

long term community goals? Yes No N/A

1. Does this plan offer to minimize

displacement or assist persons displaced or

assist persons displaced by CDBG funded

activities? Yes No N/A

1. Does this plan affirm fair housing? Yes No N/A
2. Does this plan adequately address civil rights issues? Yes No N/A
3. Does this city/town/county have any working

relationships or contract with housing groups? Yes No N/A

1. List the groups:
2. Is there data on the extent to which each of the following

groups have participated in, or benefited from any program

or activity funded in whole or in part with CDBG funds? Yes No N/A

[ ] Racial/ethnic group?

[ ] Single-headed household by gender?

[ ] Household head disabled?

[ ] Elderly?

1. If CDBG related housing benefits are reviewed only through application, how are the applicants ranked and rejected? (Explain)
2. Is this procedure consistent with CDBG Civil

Rights Objective? Yes No N/A

1. What other private or public entities involved? (i.e. banks, public housing, private business)
2. Do they advocate Fair Housing and other

civil rights issues? Yes No N/A

1. Is there documentation to show that the recipient

is promoting Fair Housing, Equal Opportunity

Employment, and other civil rights requirements? Yes No N/A

1. Are any grant or loan programs instituted

by this CDBG program restrictive? Yes No N/A

1. What was the publication method and sources

used to advertise this program to the general public

or other affected groups?

1. Were disabled provisions included in the

housing project? Yes No N/A

**Employment Contracting**

1. Has there been an effort to contact or include

Minority Business Enterprises Section 3

residents or businesses? Yes No N/A

1. Does documentation exist? Yes No N/A
2. Is there data on participation of lower

income residents in employment and

retraining generated by CDBG funds? Yes No N/A

1. Were local/regional employment agencies

(public and private) contacted? Yes No N/A

1. Were public notices and advertisements in

accordance with CDBG Civil Rights Objectives Yes No N/A

1. How many low-income and/or minorities

have been hired through the use of CDBG funds? Yes No N/A

[ ] Low Income Total

[ ] Minority Total

1. Does documentation exist? Yes No N/A

**Contract Awards**

1. Do recipient/contractor contracts include

appropriate civil rights provisions? Yes No N/A

1. Are any minority contractors included in

the rejected bidders? Yes No N/A

1. Are the reasons for denial appropriate

to civil rights provisions? Yes No N/A

1. Is there any evidence of unfair treatment

of applicants and/or employees in CDBG

funded construction projects? Yes No N/A

1. Are there provisions in the contract for the

general contractor to address the hiring of

minority subcontractors? Yes No N/A

1. Section 3 residents and business

interests? Yes No N/A

Notes:

**Displacement/Relocation**

1. Have any businesses or individuals been

displaced? Yes No N/A

1. Does the grantee have a

Displacement/Relocation plan? Yes No N/A

1. Is this plan consistent with the State’s plan,

regulations, and civil rights objectives? Yes No N/A

1. Is data maintained on the impact of

displaced households? Yes No N/A

1. Is there documentation as to the types of

location of replacement housing for the

displaced persons? Yes No N/A

**Section 504 Compliance**

1. Has a Section 504 coordinator been

designated? Yes No N/A

1. Name of designated person:
2. Has a grievance procedure that provides for

the submission and resolution of complaints

been established? Yes No N/A

1. Has a self-evaluation of programs and

activities been completed? Yes No N/A

1. Has a transition plan outlining necessary

structural changes been completed? Yes No N/A

1. Are continuing steps being taken to notify

beneficiaries and employees the sub recipient

does not discriminate on the basis of handicap?

(All notices must be effective for those with

impaired vision and hearing) Yes No N/A

Notes:

**Civil Rights Review of Recipients**

Comments on Concerns in Recipient’s Civil Rights Review

Suggested Corrective Actions and Timetable

Follow-Up Contacts

1. Have you physically visited the site

of the project? Yes No N/A

1. Describe the degree of completeness of the project; is project site progress commensurate with progress reported in quarterly status reports?:
2. If the project was finished, describe the activities or use of the site:
3. Are major items purchased with CDBG funds

available for visible inspection? Yes No N/A

1. List major items checked:
2. If this is an economic development project,

does the business appear active and is business

being conducted as expected? Yes No N/A

1. If project is a business how many workers

did you observe on site?

1. Is the amount of observed workers consistent

with the amount reported? Yes No N/A

1. Are the grantee or recipient maintaining records

to document the achievement of the hiring goal for

retention of jobs or creation of jobs for low to

moderate income persons as proposed in the original

application and included in the Wyoming Business

Council’s contract? Yes No N/A

1. If project is a community development project,

did you sample the existing client files? Yes No N/A

1. If so, how many were sampled and what were the results?
2. If project is under the slums and blight national

objective, did you visit the sites where work was

completed? Yes No N/A

1. List the location of sites visited:
2. Were these sites in the original

designated area? Yes No N/A

1. Did the rehabilitation work seem consistent

with the activities originally defined as causing

the slums and blight? Yes No N/A

1. If the project was not 100% complete, then based upon the

on-site review, does the level of project implementation

appear consistent with project progress reports? Yes No N/A

1. Based upon the on-site review, does it appear

that the project will be or has been completed

in conformance with the implementation of

schedule in the grant contract? Yes No N/A

1. If not, please explain how the situation will be resolved:

For all projects:

Have arrangements been made to insure assume retention of all CDBG

related records for five years? Yes No N/A

Were there any public comments, inquiries, or complaints

regarding the project. If problems were identified or

complaints were received, did they receive responses within a

reasonable time period (15 days)? Yes No N/A

Were problems or complaints resolved promptly

and satisfactorily? Yes No N/A

What additional materials are required to close this project?

Are there any missing documents? Yes No N/A

If so, by what date will they need to be submitted?

Who is responsible for this follow-up?

Performance measures-what objective outcome was achieved with the project?

Number of beneficiaries and how was that number derived?

**On-Site Review of Recipients**

Comments on Concerns in Recipient’s Program

Suggested Corrective Actions and Timetable

Follow-Up Contacts

**ACQUISITION REVIEW**

1. Total number of acquisitions proposed:
2. Number of acquisitions made to date:
3. Date WBC authorized the grantee to begin acquisition procedures:
4. Date WBC forwarded to grantee the recordkeeping requirements and information booklets:
5. Documentation that grantee agrees that any real property acquired or improved in whole or in part using CDBG funds in excess of the threshold for small purchase procurement (2 CFR 200.88) shall comply with the standards described in 24 CFR Part 570.489 (j). These standards shall apply from the date CDBG funds are first spent for the property until five (5) years after the closeout of the project.

Notes – What type of documentation?

Copy for WBC?

Copy in grantee file?

**General Information: Complete for EVERY Acquisition Monitored:**

1. Name of property owner:
2. Telephone number:
3. Address of acquired property:
4. Property Use:

 [ ] Single Family Residence [ ] Family Residence

 [ ] Business [ ] Nonprofit

1. Occupants? Yes No
2. Tenants? Yes No

**Complete only for VOLUNTARY acquisition, not governed by Uniform Act**

Does the grantee’s file include the following documentation:

**Date Documentation File Amount**

\_\_\_\_\_\_\_\_\_\_ Voluntary Agreement between

 grantee and individual seller $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Appraisal $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Was there a review of the

 appraisal? $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Who was the reviewer?

\_\_\_\_\_\_\_\_\_\_\_\_ Contract signed/proof of payment $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Recording property deed $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Record of settlement costs $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Filing of complaint or appeal

 (if applicable)

\_\_\_\_\_\_\_\_\_\_\_\_ Resolution of complaint or appeal

 (if applicable)

**Complete for acquisition GOVERNED BY UNIFORM ACT**

Does the grantee’s file include the following documentation:

**Date Documentation File Amount**

\_\_\_\_\_\_\_\_\_\_\_\_ Preliminary Acquisition Notice issued

\_\_\_\_\_\_\_\_\_\_\_\_ Contract for appraisal, including proof

 that owner was invited to accompany appraiser

\_\_\_\_\_\_\_\_\_\_\_\_ First appraisal completed $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Second appraisal completed

 (if over $25,000) $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Were appraisals reviewed?

**Date Documentation File Amount**

 Name of Reviewer

\_\_\_\_\_\_\_\_\_\_\_\_ Written offer to purchase Statement of $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Determination of Just Compensation issued?

\_\_\_\_\_\_\_\_\_\_\_\_ Owner accepted offer $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Contract signed/Evidence of payment

\_\_\_\_\_\_\_\_\_\_\_\_ Recording of property deed

\_\_\_\_\_\_\_\_\_\_\_\_ Agreement for Compensation of

 Related Improvements (if applicable) $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Justification of Excess Payment

 (if applicable) $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Final notice to acquire negotiation

 issued (if applicable) $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ If condemnation, date just compensation

 deposited with court $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ If condemnation, date just compensation

 deposited with court $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_ Filing of complaint or appeal

 (if applicable) $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_ Resolution of complaint or appeal

 (if applicable

\_\_\_\_\_\_\_\_\_\_\_\_\_ If the recipient permits an owner or

 tenant to occupy the real property acquired,

 was the rent charged equivalent to the fair

 rental value of the property? Yes No N/A

**Relocation**

1. Number of owner relocations proposed: To Date:

2. Number of tenant relocations proposed: To Date:

3. Number of business relocations proposed: To date:

4. Total number of relocations proposed: To date:

5. Method of relocation:

 Governed by Uniform Act \_\_\_\_ OR Optional Relocation \_\_\_\_

6. Were any complaints or appeals filed? Yes No

 If yes, describe issue and how it was resolved:

7. Approximately 60 days after the relocation payment

 has been made and the relocation has taken place, does the

 grantee follow-up to determine whether the replacement

 housing is satisfactory? Yes No N/A

8. Is there a separate relocation file for each displaced

 family for business? Yes No N/A

**In each file does there contain the following:**

[ ] Identification of each person displaced (residential only)

 [ ] Legal description of the displacement property

 [ ] Racial/ethnic group classification

 [ ] Age and sex of all household members

 [ ] Monthly rent and utility costs for displacement and replacement housing

 [ ] Type of business

 [ ] Written description of each household/business relocation needs and preferences

9. Is a copy of the notice of relocation eligibility in the file? Yes No N/A

10. Did the notice of relocation eligibility reference the

 location and costs of comparable housing? Yes No N/A

11. If applicable, is the notice of the right to continue

 occupancy included? Yes No N/A

12. Is a copy of the 90 day notice in the file? (if the person

 was ordered to move) Yes No N/A

 Date they must move:

13. Is there evidence of receipt of such 90 day notice? Yes No N/A

14. If applicable, is there evidence of receipt of the

 30 day notice? Yes No N/A

15. Was a 30 day notice in the file? Yes No N/A

16. If applicable, is there evidence of receipt of

 the 30 day notice? Yes No N/A

17. Is documentation of reason for refusing relocation

 referrals or payments included? Yes No N/A

18. Is there a dwelling replacement report that

 includes date of inspection on file? Yes No N/A

19. Is there evidence that referrals to comparable

 replacement for both residential or business were

 adequate? Yes No N/A

 Explain the evidence

20. Do files contain claims forms for payments? Yes No N/A

From the Claims Forms provide the following:

**For Residential Relocations**

Monthly Housing Costs: Acquired Dwelling \_\_\_\_\_\_\_\_\_\_\_\_\_ Replacement \_\_\_\_\_\_\_\_\_\_\_\_\_

Type of Payment Amount Claimed Approved $ Date Paid

Moving Expenses

Actual $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_

Fixed $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_

Replacement Housing Payment

Homeowner (180 day) $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_

Rental Assistance (90 day) $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_

Type of Payment Amount Claimed Approved $ Date Paid

Down Payment (90 day) $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_

Household Characteristics

White \_\_\_\_\_\_\_\_\_\_ Black \_\_\_\_\_\_\_\_\_\_ American Indian or Alaskan Native \_\_\_\_\_\_\_\_\_\_

Hispanic \_\_\_\_\_\_\_\_\_\_ Asian or Pacific Islander \_\_\_\_\_\_\_\_\_\_

Gross Family Income (monthly): $\_\_\_\_\_\_\_\_\_\_ Number of Family Members \_\_\_\_\_\_\_\_\_\_

Female Head of Household \_\_\_\_\_\_\_\_\_\_ Disabled\_\_\_\_\_\_\_\_\_\_ Elderly\_\_\_\_\_\_\_\_\_\_

For Business Relocation

Type of Payment Amount Claimed Approved $ Date Paid

Moving Expenses

Actual $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_

Fixed $\_\_\_\_\_\_\_\_\_\_\_\_\_ $\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_

Notes:

**Acquisition & Relocation Review of Recipients**

Comments on Concerns in Recipient’s Acquisition & Relocation System

Suggested Corrective Actions and Timetable

Follow-Up Contacts

**Appendix A**

**CDBG PROJECT CONTACTS/RESPONSIBLE INDIVIDUALS**

**GRANTEE:**

**PROJECT:**

|  |  |
| --- | --- |
| **RESPONSIBLE OFFICIAL**(MAYOR OR CHAIR OF THE COUNTY COMMISSION | RESPONSIBLE FOR: SIGNING GRANT AGREEMENTS AND AMENDMENTS, SIGNING REPORTS, REQUESTING AMENDMENTS, UPDATING THE PROJECT CONTACTS FORM, AND MEETING ALL REQUIREMENTS LISTED IN OUR GRANT AGREEMENT. |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |  |
| --- | --- |
| **RESPONSIBLE FOR PROJECT ADMINISTRATION** (USUALLY THE CLERK/TREASURER AND/OR NONPROFIT ORGANIZATION DIRECTOR | RESPONSIBLE FOR PROJECT ADMINISTRATION, PREPARATION AND SUBMISSION OF DRAWDOWN REQUESTS |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |  |
| --- | --- |
| **RESPONSIBLE FOR PREPARING QUARTER REPORTS** | RESPONSIBLE FOR COMPILING INFORMATION, PREPARING, SIGNING AND SUBMITTING QUARTERLY REPORTS IN A TIMELY MANNER |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |  |
| --- | --- |
| **RESPONSIBLE FOR CONSTRUCTION PROJECT MONITORING** (USUALLY THE DIRECTOR OF PUBLIC WORKS) | RESPONSIBLE FOR OVERSEEING CONSTRUCTION OPERATIONS, REVIEWING ALL INVOICES TO ASSURE THAT BILLED GOODS AND SERVICES HAVE BEEN DELIVERED, MONITORING PROCUREMENT REQUIREMENTS, CONSTRUCTION CLOSE-OUT AND RESPONDING TO ANY QUESTIONS THE WBC HAS ABOUT THESE ACTIVITIES AND MEETING ALL RELATED REQUIREMENTS LISTED IN YOUR GRANT AGREEMENT |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE  |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |  |
| --- | --- |
| **RESPONSIBLE FOR FEDERAL LABOR ENFORCEMENT** | SEE LABOR STANDARDS GUIDE ON WBC WEBSITE |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE  |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |  |
| --- | --- |
| **RESPONSIBLE FOR PREPARATION AND ADMINISTRATION OF ENVIRONMENTAL REVIEW** |  |
| NAME, TITLE |  |
| ORGANIZATION |  |
| MAILING ADDRESS |  |
| PHONE |  | FAX |  |
| CELL OR OTHER |  |
| EMAIL ADDRESS |  |

|  |
| --- |
| SIGNED: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ DATE: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *RESPONSIBLE OFFICIAL AS LISTED ON PAGE 1 OF FORM*PRINTED NAME AND TITLE: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |