



# The Three Cs: Compliance, Checklists, & Cat Memes

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2024 Grant Management Workshop



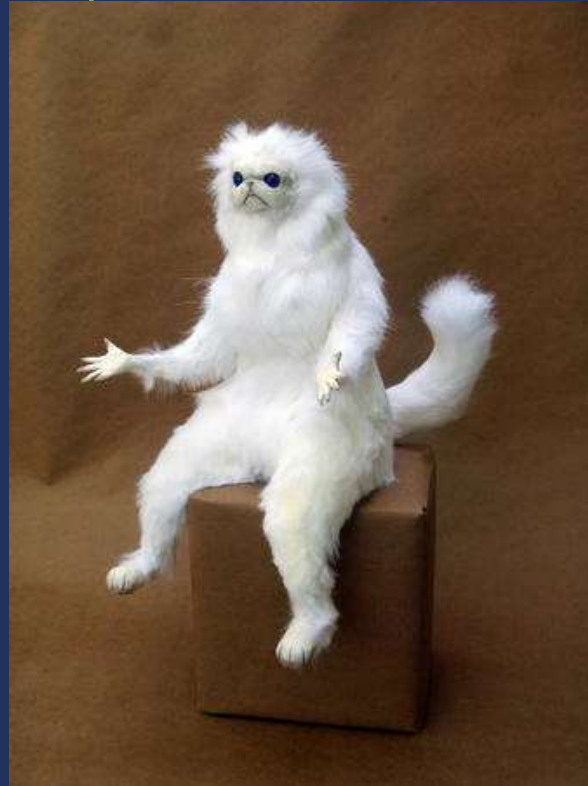
VIRGINIA DEPARTMENT OF HOUSING  
AND COMMUNITY DEVELOPMENT  
*Partners for Better Communities*





# Why monitor for compliance?

- DHCD monitors grantees.
- HUD monitors DHCD.
- We all adhere to the same rules & regulations.



<https://hbfites.ae/what+is+the+white+cat+meme+from>



## Before the Review

- Organize Folders
- Clearly Label Files
- Save Documents as PDFs
- Upload Documents to CAMS
- Review Annual & Final Report Template



<https://cheezburger.com/9083412736>



## Get Scheduled

- Off-Site & On-Site Review
- Save the Date Invite
- “Here We Come” Letter
- Document Checklist or Compliance Checklists



<https://www.instagram.com/catmemesforall/p/C5G5nK1OB05/>



# Example Compliance Document Checklist

Interim/Final Compliance Review Document List for Off-Site Monitoring  
 Grantee Name | Project Name | Project Number  
 Date of Review

## PROJECT MANAGEMENT

- Picture of project sign erected in project area.
- Executed Project Management Plan, including most recent timeline.
- DHCD monthly status reports.
- Agendas and minutes for monthly Project Management Team meetings.
- Agendas and minutes for monthly Housing Rehab/Housing Production/Façade/Micro-Loan committee meetings.

## FILES AND CONTRACTS

- CDBG application
- Executed contract with DHCD
- Executed contract amendments with DHCD, if applicable.
- Executed grant management or housing program administrator contract, including *Attachment to All Non-Construction Contracts* (Appendix 10, p. 30-36).
- Executed CDBG-funded consultant contracts (i.e. housing program administrator, ASOE, community service facility providers, appraiser, demolition, acquisition specialist, relocation specialist, engineer or architect contract), including *Attachment to All Non-Construction Contracts*.
- Executed rehab specialist contract, including *Attachment to All Non-Construction Contracts*.
- Executed interagency agreement (i.e. PSA, IDA, EDA), *Attachment to All Non-Construction Contracts*.
- Executed industry agreement, including *Attachment to All Non-Construction Contracts*.
- Executed amendments to any of the aforementioned service or agency contracts, if applicable.

## CITIZEN PARTICIPATION

- Formal written complaints, if any, and documentation of grantee's efforts to resolve the complaint(s).
- Copies of project specific information (e.g. flyers, mailers, brochures, door hangers, emails about the project activities, citizen rights, and information for filing complaints) given to project area residents, applicants, and any concerned citizens.
- If the project had a change of scope that required another public hearing (e.g. a change in the proposed beneficiaries):
  - Copy of proof(s) of publication for public hearing advertisement showing name of paper, date of publication, and public notice language
  - Documentation of second method of notifying citizens of public hearing.
  - List of meeting attendees.
  - Minutes of public hearing.
  - Documentation of requested accommodations for persons with disabilities and/or persons who do not speak English.
  - Documentation of how the grantee met the requested accommodations.

## EQUAL OPPORTUNITY

- Picture of grantee's non-discrimination policy posted in location where it can be seen by employees, potential job applicants, and potential/actual beneficiaries.
- Spreadsheet documenting project beneficiaries, including information on LMI/non-LMI designation and protected classes (minorities, female head-of-household, elderly, and/or persons with disabilities).
- Complete the following table for minority- and/or female-owned businesses:

MINORITY- & FEMALE-OWNED BUSINESSES CONTRACT AWARDS	
CONSTRUCTION CONTRACTS, including subcontracts	
A. Total dollar amount of all construction contracts awarded with CIG funds	\$
B. Total dollar amount of all construction contracts awarded to minority- and/or female-owned businesses	\$
C. Percentage of the total dollar amount that was awarded to minority- and/or female-owned businesses	%
D. Total number minority- and/or female-owned businesses awarded a construction contract	
CONSULTANT CONTRACTS	
A. Total dollar amount of all consultant contracts awarded with CIG funds	\$
B. Total dollar amount of all consultant contracts awarded to minority- and/or female-owned businesses	\$
C. Percentage of the total dollar amount that was awarded to minority- and/or female-owned businesses	%
D. Total number minority- and/or female-owned businesses awarded a consultant contract	

- Complete the following tables for Section 3 businesses:

SECTION 3 (LOCAL) BUSINESSES CONTRACT AWARDS	
CONSTRUCTION CONTRACTS, including subcontracts	
A. Total dollar amount of all construction contracts awarded with CIG funds	\$
B. Total dollar amount of all construction contracts awarded to Section 3 businesses	\$
C. Percentage of the total dollar amount that was awarded to Section 3 businesses	%
D. Total number Section 3 businesses awarded a construction contract	
CONSULTANT CONTRACTS	
A. Total dollar amount of all consultant contracts awarded with CIG funds	\$
B. Total dollar amount of all consultant contracts awarded to Section 3 businesses	\$

# Example Compliance Document Checklist

## SECTION 3 (LOCAL) BUSINESSES CONTRACT AWARDS

C. Percentage of the total dollar amount that was awarded to Section 3 businesses	%
D. Total number Section 3 businesses awarded a consultant contract	

Complete the following table for responses to the Section 3 and Minority- and Female-Owned advertisements:

Number of Project Area Businesses that Responded to Section 3 Business and Employment Ad	Number of Individuals who Responded to Section 3 Business and Employment Ad	Number of Section 3 Project Area Residents Hired for Project-Related Work	Number of Minority and/or Female Owned-Businesses that Responded to MBE/WBE Ad

Documentation of fair housing activity for each contract year.

### BENEFITS

- Documentation confirming grantee has met proposed benefits.
  - Copy of excel Benefits tracking spreadsheet (do not send as PDF)
  - Community Service Facilities*: number of individuals served by facility, including LMI/non-LMI.
  - Economic Development*: number of full-time and part-time jobs, EDA job classification, jobs created or retained, demographics (minority, elderly, female head of household, disability), LMI/non-LMI, documentation of blight elimination, documentation of activities taken to alleviate vacancy rate, and documentation of façade improvements.
  - Job Counting*: A copy of the excel loan tracking spreadsheet, a copy of Record of Employees Hired and Referred for each borrower (Appendix 21), a copy of the Income Certification for Job Benefit for each worker hired (Appendix 71), and a listing of all training attendees by class name and date, which will be used until an on-site review of the loan files can be conducted.
  - Relocation*: A copy of the Acquisition, Pre-relocation and Relocation excel tracking spreadsheets, which will be used until an on-site review of acquisition and relocation files can be conducted (do not send as a PDF).
  - Community Facilities*: evidence LMI households have been physically connected or otherwise directly benefitted (i.e. customer service list), map showing individual connections (LMI/non-LMI).
  - Housing*: complete the following table until an in-person review of client files can be conducted

	Moderate Income	Low Income	Elderly	Minority	Female Head	Disabled	Non-LMI	%	Tenant
# applications received									
# applications approved									
# bids released									
# units under contract									
# units under construction									
# units completed									
# relocations planned									
# relocations completed									

### FINANCIAL

- Documentation grant funds have been formally appropriated every fiscal year (resolution or proof of appropriation in board of supervisors or city/town council minutes).
- Accounting records showing grant-related transactions.
- EDI statements showing funds deposited into the grantee's bank account.
- Invoices and proof of payment for CDBG/ARC-funded expenses (cancelled checks, payment vouchers, etc.) organized by remittance request number.
- Invoices and proof of payment for leverage expenses (cancelled checks, bank statements showing checks issued to contractors and consultants have been cashed, payment vouchers, etc.).
- Copy of budget revision approval(s), if applicable.



# Example Compliance Document Checklist

## PROCUREMENT—NON-PROFESSIONAL SERVICES

- If contract amount less than \$15,000, provide a description of the procurement process.
- If contract amount equal to or greater than \$15,000, provide proof(s) of publication for the Request for Proposals/Statement of Qualifications showing the name of the newspaper, date of publication, and advertisement language.
- If contract amount (including amendments) equal to or greater than \$50,000, provide a copy of the Contractor Disclosure Report (Appendix 70).
- Proof of publication for the Request for Qualifications/Proposals (RFQ/P).
- Copies of Statements of Qualifications/Proposals received.
- List of evaluation committee members.
- Evidence each proposal was evaluated and ranked based on information requested in RFQ/P.

## PROCUREMENT—PROFESSIONAL SERVICES

- If contract amount less than \$15,000, provide a description of the procurement process.
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- List of evaluation committee members.
- Evidence each proposal was evaluated and ranked based on information requested in RFQ/P.

## PROCUREMENT—REHAB CONSTRUCTION (HOUSING REHAB OR FACADES)

- Copy of proof(s) of publication for the pre-qualification advertisement showing the name of the newspaper, date of publication, and advertisement language.
- Description of any other means of used to solicit contractors.
- List of pre-qualified contractors.
- Licenses and proof of insurance for all pre-qualified contractors.
- Date and list of attendees for each bid opening.
- Bid tabulation spreadsheet for each bid opening and Rehab Specialist or architect/engineer's recommendation to award to the lowest, responsive, responsible bidder.
- If the recommended contractor's bid was higher than 10% of the cost estimate, provide a copy of the Rehab Specialist's or architect/engineer's written explanation for still awarding the contract.
- Copy of Contractor's Disclosure Report (Appendix 70) for any contract awards (including change orders) equal to or greater than \$50,000.
- Documentation the Housing Rehab or Façade Board approved all contract awards (e.g. copies of meeting minutes showing board approval).
- Complete the Contract Award Tracking Spreadsheet showing the contractors awarded contracts, including the number of contracts each received and the total value of the contracts.
- Executed contracts including Federal Construction Contract inserts.
- Copies of Monthly Contractors, Subcontractors, and Suppliers.

## PROCUREMENT—CONSTRUCTION

- Executed copy of construction contract(s) including the Federal Construction Contract inserts.
- Engineer-approved/stamped and signed Plans and Specs (can submit only first page showing project name, grantee, and date and name of engineer approval).
- Copy of proof(s) of publication for the advertisement for bids showing the name of the newspaper, date of publication, and advertisement language.
- Copy of bid tabulation spreadsheet and engineer's recommendation to award to the lowest, responsive, responsible bidder.
- Copy of Non-Debarment letter.
- Copy of Contractor's Disclosure Report (Appendix 70).
- Executed Notice of Award.
- Copy of contractor Performance Bond (if contract equal to or greater than \$100,000).
- Copy of contractor Payment Bond (if contract equal to or greater than \$100,000).
- Copy of Section 3 Plan and Certification completed by contractor within 30 days of Notice of Award (if contract equal to or greater than \$100,000).
- Executed Notice to Proceed.
- Copy of change order(s), if applicable.

## Example Compliance Document Checklist

### LABOR STANDARDS

- Copies of your Log of Payrolls (Appendix 47) and Log for Reviewing Employees on Payrolls (Appendix 48)
- Copy of minutes from pre-construction conference.
- Copy of the Labor Standards checklist (Appendix 45) signed by the general contractor and all subcontractors.
- Copy of the Equal Opportunity checklist (Appendix 52) signed by the general contractor and all subcontractors.
- Copy of wage decision(s) issued for the project.
- Copy of additional job classification request(s), if applicable.
- Provide the name of each subcontractor and their type of work (i.e. electrical, plumbing, paving) in the following table:

Name of Subcontractor	Type of Work

- Identify the percentage of work completed for each construction contract.
- If contractor or subcontractor use apprentices, provide documentation of State-approved apprenticeship program.
- Copies of certified payrolls for the prime contractor.
- Copies of certified payrolls for each subcontractor.
- Copies of signed Authorized Deduction Forms, as applicable, for the prime contractor and each subcontractor.
- Copies of interview forms for the prime contractor. If interviews weren't conducted every month or if all trades did not get interviewed, provide a written explanation why.
- Copies of interview forms for each subcontractor. If interviews weren't conducted every month or if all trades did not get interviewed, provide a written explanation why.
- Register(s) of Assigned Employees (RAE) for the prime contractor, including any updated RAEs.
- Register(s) of Assigned Employees (RAE) for each subcontractor, including any updated RAEs.
- Monthly Register(s) of Contractors, Subcontractors, and Suppliers for the prime contractor.
- Monthly Register(s) of Contractors, Subcontractors, and Suppliers for each subcontractor.
- If the grantee received any responses to the Section 3 and/or minority- and female-worker advertisement, provide documentation showing responses were made available to the prime contractors.
- Picture showing prime contractor has posted the wage decision and all required Federal Labor Standards posters on the job site where they can be seen by employees. Make sure the photo clearly shows that the Employee Rights under the Davis-Bacon Act poster has been filled in.

2023 projects and all future projects will be subject to Build America Buy America compliance.





## During the Off-Site Review

- PA reviews files & completes checklists.
- Be available.
- Don't panic.



<https://tnireland.ie/tnr/how-to/for-trappers/paperwork/>



## During the On-Site Review

- Visit project site(s) with PA.
- Communicate early & often.
- Dress appropriately.
- Bring supporting documents.

<https://www.stripes.com/theaters/us/2023-10-30/cat-dog-calendar-11877395.html>



## After the Review

- Virtual or In Person Debrief
- Letter of Findings
- Clearing Issues



<https://knowyourmeme.com/photos/1642536-cats>



# Reminders

- Set up files ASAP.
- Scan files as PDFs.
- Clearly name all files.
- Maintain documents with original signatures.
- Meet deadlines.
- Follow guidance from your PA.



<https://www.pinterest.com/pin/thumbs-up--743164375982625905/>



# Up Next:

- Wrap Up
- Lunch Break
- Homebuyer Program Track begins at 1:45



VIRGINIA DEPARTMENT OF HOUSING  
AND COMMUNITY DEVELOPMENT  
*Partners for Better Communities*



<https://www.ebay.com/itm/115723550506>

## Questions? Contact Me!

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