

Compliance Table

Demonstrating HUD Compliance During the Natural Disaster Recovery Process

State and local governments in the path of natural disasters need to think strategically about recovery from the very beginning. There are steps you should take before the HUD Community Development Block Grant Disaster Recovery (CDBG-DR) funds become available to you—and throughout the recovery process—to ensure HUD compliance. The table below provides recommendations designed to help you keep documentation and compliance top-of-mind as you craft your Action Plan and move through the recovery process.

HUD Monitoring Objectives and Program Implementation:

Program Phase	Monitoring Objective	Detail and Documentation
Action Plan Approval	Did citizens and stakeholders have enough information and opportunities to comment?	<ul style="list-style-type: none"> *Maintain a written Citizen participation plan in compliance with the Federal Register notice. *<u>Document</u> sufficient public comment periods and public hearings as required. *<u>Document</u> access to Action Plan and public meetings for persons with disabilities or for whom English is not primary language.
Program Design	Are the proposed activities eligible and do they meet a national objective and Federal Register requirements?	<ul style="list-style-type: none"> *Before implementation, <u>document</u> how each activity is eligible (e.g., for CDBG-DR must show tie-back to the disaster) and meets the national objective. *Maintain your analysis in the program files.
Policy and Procedures	Do the policies and procedures match activities in the Action Plan and reflect how the program is being implemented?	<ul style="list-style-type: none"> *Develop written policies and procedures that align with the Action Plan. *Update and track all changes to the policies and procedures as programs are modified.
Staff Training and Capacity	Does the grantee staff have capacity to manage the program?	<ul style="list-style-type: none"> *Develop and <u>document</u> staff trainings that support the program.
Procurement	Did grantee and subrecipients follow federal uniform procurement requirements? Was there fair competition?	<ul style="list-style-type: none"> *Develop written procurement procedures that comply with 2 CFR 200. *<u>Document</u> each step in the procurement process and keep in program files.
Community Outreach and Program Participation	Did the program provide outreach to low income communities and relevant stakeholders?	<ul style="list-style-type: none"> *<u>Document</u> all efforts to provide outreach to affected citizens. *<u>Document</u> that application intake was accessible to all applicants.

Program Phase	Monitoring Objective	Detail and Documentation
Applicant Eligibility and Awards	Were all applicants who received an award eligible for the assistance and treated fairly across all demographics? Were the awards made in accordance with program policies?	*Ensure all applications are maintained in the project files. * <u>Document</u> all variables that were factored into the applicant awards (e.g., for CDBG-DR, all potential duplicated benefits).
Preparing Scopes of Work	Is the scope of work necessary and reasonable? Have other federal cross-cutting requirements been met?	* <u>Document</u> how scope of work was determined and priced. * <u>Document</u> compliance with cross-cutting requirements such as environmental, URA, etc.
Delivering Scopes of Work	Did the program oversee and monitor implementation?	* <u>Document</u> daily/weekly progress reports and photos of work complete.
Paying for Services Delivered	Did the grantee pay more than what was agreed upon in the contract for services?	* <u>Document</u> invoice reviews. *Ensure contracts are not expired and contain scope of work being paid for by grantee.
Closing Out the Project	Did the project meet its intended purpose with all necessary compliance documented in the file?	*Develop a close-out checklist and ensure <u>all documentation</u> was maintained throughout the life of the project.

About ICF

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Deborah Siefert has 20 years of specialized experience in managing HUD funded programs for entitlement communities and Community Development Block Grant Disaster Recovery (CDBG-DR) programs across the United States.

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