**HPRP Grantee Monitoring Toolkit**

About this Toolkit

The Homelessness Prevention and Rapid Re-Housing Program (HPRP) provides communities with substantial resources for preventing and ending homelessness. Grantees may carry out all of the eligible activities themselves or may subgrant all or a portion of the funds to other public or non-profit agencies to provide the services on their behalf. In either case, the grantee retains responsibility for ensuring that funds are properly expended for eligible activities to eligible persons and in a manner consistent with all requirements set forth in the HPRP Notice and subsequent HUD guidance (published at [www.hudhre.info](http://www.hudhre.info)).

This toolkit is designed to familiarize grantees with the specific requirements for which they are responsible and to provide them with tools to review and monitor the practices of subgrantees. Each section describes a set of requirements and provides a basic tool for reviewing subgrantee performance in that particular area. The tools provided can be used separately or together. The tools are also available in Word format so that grantees can customize them as needed to capture additional grantee requirements and/or local program design.

### Overview of HPRP Grantee Roles and Responsibilities

In 2009, 535 local and state governments received Homelessness Prevention and Rapid Re-Housing Funds (HPRP) as part of the American Recovery and Reinvestment Act. This infusion of funds represents a significant expansion in the resources available to communities across the country to prevent and end homelessness. HPRP funds provide for a variety of services and assistance to both persons who are already homeless and to those at risk of becoming literally homeless if they do not receive assistance. While HPRP funds may be used for an array of services and needs, funds are restricted to a range of specific eligible activities and may only be used to assist persons who meet a defined set of eligibility criteria.

Subgrantee monitoring reinforces accountability, provides opportunities for positive feedback and quality improvement, and is required by the HPRP Notice. The recommended practices and tools in this tool kit are based on well-established practices in the field and for other HUD programs, but are not specifically required by the HPRP Notice. Quality Assurance and monitoring should not be a one-time event, but rather a process for continuous communication between the grantee and its subgrantees.

Grantees are responsible for ensuring that HPRP funds are expended in a legal and timely fashion and that the programs and activities they support operate in a consistent, effective and efficient manner, consistent with the program’s intent. This includes ensuring that:

* funds are spent only on eligible people;
* funds are spent only for eligible activities;
* funds are committed and expended within the prescribed deadlines; and
* policies and practices follow all the federal and any local requirements.

To ensure that the requirements are met, while promoting effective and efficient services delivery, grantees have a number of methods and tools they may use, including:

* training, tools and technical assistance around compliance and best practices to subgrantees and/or their staff;
* program policies, required forms or procedures, and other written guidance that further explains or prescribes requirements and expectations;
* data quality oversight and review for all client and program data gathered and reported on through the Homeless Management Information System (HMIS) or comparable database; and
* ongoing oversight and periodic monitoring of subgrantees performance through site visits and direct reviews of subgrantee policies, practices, file documentation and other records.

### Creating a Quality Assurance and Monitoring Process

To be an effective tool for improving performance and maintaining compliance, monitoring should involve an on-going process of planning, implementation, communication and follow-up. Grantees should develop a local system for monitoring, which includes creating a monitoring plan and procedure for conducting on-site visits. In the monitoring plan, grantees should identify the priority and schedule by which subgrantees will be monitored. In order to determine priority, grantees should assess which subgrantees might need more guidance or be at higher risk for not complying with HPRP requirements. This process is known as “risk-assessment.” Below is a sample tool with several potential risk factors, which may be adapted to local conditions. Grantees may want to prioritize subgrantees for on-site monitoring visits where “yes” is the predominant answer to the questions below.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Risk Factors** | **Yes** | **No** | **N/A** | **Comments** |
| Is this subgrantee new to working with the grantee? |  |  |  |  |
| Is this subgrantee new to administering federal grants? |  |  |  |  |
| Is this subgrantee new to conducting prevention and/or rapid re-housing activities? |  |  |  |  |
| Has there been recent and/or frequent turnover in key staff positions? |  |  |  |  |
| Have there been previous compliance or performance concerns including failure to meet schedules, submit timely reports and/or clear monitoring/audit findings? |  |  |  |  |
| Have there been registered complaints by clients, other agencies and/or the media? |  |  |  |  |
| Has there been difficulty with the accuracy and/or timeliness of subgrantee invoicing? |  |  |  |  |
| Is this subgrantee administering grants from multiple grantees? |  |  |  |  |
| Does the subgrantee lack adequate cash flow to meet the demands of the program? |  |  |  |  |
| Additional factors: |  |  |  |  |

**Preparing for On-site Monitoring Visits**

Training the monitoring staff is an important part of preparation for a monitoring visit. Monitoring staff should be familiar with the applicable HPRP rules and available resources (all available at http://www.hudhre.info/HPRP), including:

* HPRP Notice
* Program Administration Requirements
* Frequently Asked Questions
* Technical Assistance Tools and Resources

Monitoring staff should also review written documentation available from the program prior to going on-site, such as:

* the subgrantee’s application for HPRP funding;
* the written agreement with the subgrantee;
* the subgrantee’s program policies and procedures and variations in program design;
* monthly/quarterly invoices;
* Quarterly Performance Reports (QPRs)and/or Annual Performance Reports (APRs);
* documentation of any previous monitoring; and
* copy of most recent audit, whether by an Independent Public Accountant (IPA) or another entity such as the HUD Office of Inspector General (OIG) or the General Accounting Office (GAO).

Finally, grantees should develop a monitoring handbook containing lists of particular items or documents to be examined as part of the monitoring. These documents may include policies and procedures of the program, as well as individual client file documentation. In order to have an effective and efficient process, it is helpful to have standardized monitoring checklists. It is also effective to share the checklists with subgrantees in advance, so they can self-monitor on an ongoing basis.

**Conducting the Monitoring Visit**

A written procedure for monitoring that is transmitted in advance to the subgrantee and underscored by personal communication can help eliminate undue anxiety and clarify expectations of both parties. It is important to emphasize to subgrantees that monitoring is both an opportunity to recognize accomplishments and to identify areas for improvement. Grantee staff performing the monitoring may want to tour service centers or other program operations to get a better sense of the subgrantee’s style and program.

Each grantee should develop a monitoring procedure that best fits the local environment. The steps outlined below and the objectives of each may serve as a guide in that development.

|  |  |
| --- | --- |
| **Step** | **Objectives** |
| 1. Written Notification
 | * Confirm the dates and the scope of the monitoring
* Provide a description of the information the grantee will review during the visit
* Specify the expected duration of the monitoring, which staff will be involved, what office space is required and members of the subgrantee’s staff requested to participate
 |
| 1. Entrance Conference
 | * Meet on-site with subgrantee’s director and appropriate financial and program staff upon arrival
* Clarify purpose, scope and schedule of the visit
 |
| 1. Documentation, Data Acquisition and Analysis
 | * Keep clear written record of steps followed and information reviewed during visit
* Use monitoring checklist or handbook to make notes about case files, statistics or financial figures and subgrantee’s written policies
 |
| 1. Exit Conference
 | * Present preliminary results of the monitoring visit
* Highlight subgrantee’s areas of compliance, agency strengths, innovative or commendable practices
* Provide an opportunity for the subgrantee to correct any misconceptions or misunderstandings
* Secure additional information from subgrantee staff to clarify or support position
* Provide subgrantee the opportunity to report on steps already being taken to correct deficiencies
 |
| 1. Follow-up Monitoring Letter
 | * Recognize positive areas or areas of significant improvement
* Identify fully every finding and concern[[1]](#footnote-1)
* Specify corrective actions, if there is a finding
* Make recommendations for improvement, if there is a concern
* Include deadlines for: 1. Providing a written response that describes how subgrantee will resolve any findings; and 2. Correcting each deficiency identified in the letter
* Mail within sixty days, or within timeframe established by the grantee
 |

### Monitoring Tools

The following pages of this Tool Kit provide a basis for the types of checklists grantees may want to adapt and use for monitoring subgrantees. These checklists might also be useful for subgrantees to self-monitor their performance related to HPRP Notice requirements and other HUD guidance. Each section begins with a brief overview and explanation of the section followed by the tool which can be adapted to the local environment and printed out separately from the rest of this document.

**Client and Services Eligibility Documentation**

HPRP requires that grantees ensure the eligibility of all service recipients and of all services provided to them. If the grantee has subcontracted the provision of direct service to one or more subgrantees, the grantee must monitor that all required eligibility documentation is collected, reviewed and retained by the subgrantee. HUD has published specific guidance about documentation of eligilbity which the grantee should review and become familiar with prior to monitoring subgrantees in this area (see <http://www.hudhre.info/documents/HPRP_EligibilityAndDocumentationGuidance.pdf>). The grantee should also ensure that subgrantees have received this guidance and any training needed to correctly implement the requirements.

The following tool is designed to be used to review the content of subgrantee client files. It is recommended that the grantee select a random sample of files for review and that the set reviewed include both files for clients/households that have exited the program and clients/households that are still actively participating in the program.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Part A: Client/ Household Eligibility Requirements**Complete each box with Y, N, or N/A | File ID # \_\_\_\_\_\_ | F le ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | **Comments/ Follow up items** (For any self certifications, check to see that the reason third party documentation was not used is explained in the file.) |
| ***A.1 Initial Consultation –*** Documented evidence of an initial consultation to determine eligibility and client needs with case manager or other authorized representative.  |  |  |  |  |  |  |  |  |  |  |  |
| ***A.2 Income Determination and Documentation –*** Documentation of all household income used to determine income eligibility, including documentation showing gross annual income (as calculated is at or below 50% area median income (AMI).  |  |  |  |  |  |  |  |  |  |  |  |
| A.3 **Housing Status Determination and Documentation** |  |  |  |  |  |  |  |  |  |  |  |
| *A.3. 1* Documentation that household is homeless; **or** |  |  |  |  |  |  |  |  |  |  |  |
| *A.3.2*. Documentation that the household is at at-risk of housing loss; **AND** |  |  |  |  |  |  |  |  |  |  |  |
| *a.* Documentation that the household lacks financial resources to obtain or remain housed; **and** |  |  |  |  |  |  |  |  |  |  |  |
| *b.* Documentation that the household lacks support networks to obtain or remain housed; **and** |  |  |  |  |  |  |  |  |  |  |  |
| *c.* Documentation that the household has no subsequent housing plan. |  |  |  |  |  |  |  |  |  |  |  |
| ***A.4 Asset Review*** – Documentation that program has reviewed and made a determination regarding household assets in keeping with local policy. |  |  |  |  |  |  |  |  |  |  |  |
| ***A.5 Other targeting factors or assessment documentation-***Documentation of household meeting any additional targeting or assessment factors established by the Granteea.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_b. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_c. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |  |  |  |  |  |  |  |  |  |
| ***A.6 Staff Certification of Eligibility for HPRP Assistance –*** Staff and supervisor have completed, signed, and dated Staff Certification of Eligibility for HPRP Assistance (with HUD logo) prior to service delivery. |  |  |  |  |  |  |  |  |  |  |  |
| ***A.8. Evidence of referrals –*** Evidence of appropriate referrals for anyone found ineligible (optional but recommended). |  |  |  |  |  |  |  |  |  |  |  |

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| **Part B: Eligible Units and Eligible Activities**Complete each box with Y, N, or N/A | File ID # \_\_\_\_\_\_ | F le ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | **Comments/ Follow up items** |
| ***B.1 Housing Plan –*** Evidence of a housing plan or other method of establishing services goals and program expectations with client household (optional) |  |  |  |  |  |  |  |  |  |  |  |
| ***B.2 Budget –*** Documentation of household budget and budget goals (optional) |  |  |  |  |  |  |  |  |  |  |  |
| ***B.3 Rent Reasonableness*** *–* Determination that rent paid by household meets HUD’s standard of reasonable rent (required for all households assisted) |  |  |  |  |  |  |  |  |  |  |  |
| ***B.4 Habitability Determination*** *–* Documentation that the unit meets HUD habitability standards or a higher standard used by the Grantee. (Note: Only required when HPRP Financial Assistance is provided to a household moving into new housing unless grantee has more stringent requirements.)  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.5 Lead Based Paint Requirements –*** Documentation that the unit complies with the Lead Based Paint Poisoning Prevention Act. **Note: Needed when HPRP Financial Assistance is provided, there is a child under 6 currently or soon to be living in the unit (due to birth, adoption or foster care placement) and the unit was constructed before 1978 (unless grantee has more stringent requirements).**  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.6 Lease*** – Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant.  Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner’s financial records, rent ledgers or canceled checks.  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.7 Documentation of Eligible Housing Relocation & Stabilization Services******Provided*** *–* Evidence that the services provided to the household are eligible services (i.e. outreach, case management, housing search and placement, legal assistance and/or credit repair only.) |  |  |  |  |  |  |  |  |  |  |  |
| ***B.8******Documentation of Financial Assistance Expenses –*** Evidence/documentation that financial assistance expenses are eligible and incurred by an eligible participant (i.e. past due rent statement, lease or overdue utility bill all in participant’s name).  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.9 Moving/storage expenses –*** Documentation that moving/storage expenses are both eligible and reasonable (that two or more cost comparisons have been made).  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.10 Payments to 3rd partie***s – Evidence that assistance funds were issued to an appropriate 3rd party, such as the landlord, utility, or moving company. |  |  |  |  |  |  |  |  |  |  |  |
| ***B.11******Eligible Motel cost –*** If financial assistance was used to pay for hotel/motel, documentation that the household had identified housing but could not yet move in **and** no appropriate shelter beds were available (limited to 30 days).  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.12 Eligible time frame*** *—* Evidence thatno more than a cumulative total of 18 months rental or utility assistance.  |  |  |  |  |  |  |  |  |  |  |  |
| ***B.12 Arrears*** *—* Evidence that no more than a cumulative total 6 months of rent or utility arrears, which count toward total time limit, was provided and that the arrears are easy to distinguish from current assistance.  |  |  |  |  |  |  |  |  |  |  |  |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Part C: Reassessment and Exit**Complete each box with Y, N, or N/A | File ID # \_\_\_\_\_\_ | F le ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | File ID # \_\_\_\_\_\_ | **Comments/ Follow up items** |
| ***C. 1 Reassessment******and Eligibility Determination –*** The household was re-evaluated at least once every 3 months for eligibility and appropriateness of assistance. This includes:  |  |  |  |  |  |  |  |  |  |  |  |
|  *a .Income Eligibilit*y – Continued income eligibility is verified and documented in the file. |  |  |  |  |  |  |  |  |  |  |  |
|  *b. Housing Status Eligibilit*y – Continued housing status eligibility, including determination that “but for” this assistance household would become or remain homeless. See 1.3 above for further information and documentation requirements.  |  |  |  |  |  |  |  |  |  |  |  |
| ***C.2 Staff Certification of Eligibility for HPRP Assistance –*** If a new staff person conducted any eligibility re-determination, file contains signed and dated Certification from that staff and a supervisor. |  |  |  |  |  |  |  |  |  |  |  |
| ***C.3 Annual Habitability Determination –*** Any housing that has been assisted for more than one year which required an original inspection has been re-inspected. |  |  |  |  |  |  |  |  |  |  |  |
| ***C.4 Annual Lead Based Paint Inspection –*** Any housing that has been assisted for more than one year which required an original lead paint inspection has been re-inspected. (See 3.5 above for further information and documentation requirements.**)** |  |  |  |  |  |  |  |  |  |  |  |
| ***C.5 Other service document***s – Documentation of additional service or assessment related steps or procedures were taken with householda.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_b. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_c. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |  |  |  |  |  |  |  |  |  |  |
| ***Documents Related to Exit*** |  |  |  |  |  |  |  |  |  |  |  |
| ***C.6. Case Closing –*** Documentation supports that HPRP assistance was ended and household was exited from program when the household was no longer eligible or in need. |  |  |  |  |  |  |  |  |  |  |  |
| ***C.7 Due Process Followed for Termination****s –* Evidence thatany household terminated from housing assistance for program violations received formal due process. |  |  |  |  |  |  |  |  |  |  |  |

**Financial Management and HPRP Expenditure Tracking**

Grantee financial management and oversight of subgrantee financial management is an essential role of the grantee for any federal program. Specific requirements for HPRP include the limitation on the use of funds for four eligible activities (housing stabilization services, financial assistance, data collection and evaluation and administration), and a 5% cap on administration costs. In addition, HPRP has two statutory expenditure deadlines: 60% of a grantee’s funds must be expended within two years of the date that HUD signed the grant agreement, and 100% must be expended within three years. Because grantees may have multiple subgrantees, having a system in place to monitor invoicing and expenditures across all subgrantees is important to allow grantees to determine whether subgrantees are on track to meet the deadlines, or if a reallocation of funds may be needed. It is recommended that grantees track expenditure rates and projections on a monthly basis.

| **Financial Monitoring Questions** | **Yes** | **No** | **N/A** | **Documentation reviewed or other basis for conclusion** | **Corrections/additions needed** |
| --- | --- | --- | --- | --- | --- |
|  Does the subgrantee use financial tracking systems and record retention practices that meet federal Uniform Administrative Requirements? (24 CFR Part 85 for public agencies and 24 CFR part 84 for nonprofit agencies) |  |  |  |  |  |
| Does the subgrantee’s financial system provide quality and reliable data for reporting to e-snaps and federalreporting.gov?  |  |  |  |  |  |
| Does the subgrantee bill only for eligible, actual and incurred expenses under one of the four activity categories? |  |  |  |  |  |
| Does the subgrantee bill or invoice the grantee in a timely manner? |  |  |  |  |  |
| Is the subgrantee on track to spend 60% of funds allocated to them prior to the two-year anniversary of the grant agreement? |  |  |  |  |  |
| Is the subgrantee on track to spend 100% of funds allocated to them to prior to the three-year anniversary of the grant agreement? |  |  |  |  |  |
| Does the subgrantee provide to the grantee, or retain for review on site, adequate supporting documentation consistent with OMB circular A-133 audit requirements? |  |  |  |  |  |
| Does the subgrantee comply with procurement and/or subcontracting requirements? |  |  |  |  |  |
| Does the subgrantee maintain adequate records for property and assets acquired with grant funds? |  |  |  |  |  |
| Is there evidence that the subgrantee has safeguards for preventing loss, damage, or theft of recipient-held property? |  |  |  |  |  |

**Homeless Management Information System (HMIS) Data Collection and Reporting**

Whether the grantee manages the data directly or not, it is recommended that the grantee has a data quality assurance process. The grantee may wish to review the following subgrantee practices to evaluate the completeness, accuracy and timeliness of the data.

| **HMIS Data Collection** | **Yes** | **No** | **N/A** | **Documentation reviewed or other basis for conclusion** | **Corrections/additions needed** |
| --- | --- | --- | --- | --- | --- |
| **Questions for subgrantees that provide direct services to clients and collect client-level data** |
| Does the subgrantee enter all required client –level data into an HMIS or comparable database, or provide the information to another agency which does this?  |  |  |  |  |  |
| If using a comparable database (not HMIS), does the subgrantee fall within one of the categories eligible to use a comparable database? (see FAQ’s for a discussion of comparable databases) |  |  |  |  |  |
| Does the subgrantee follow the HMIS privacy and security standards related to the collection and storing of data? |  |  |  |  |  |
| Does the subgrantee produce regular quality assurance reports from the HMIS to verify that the information is complete and accurate? |  |  |  |  |  |
| Does the subgrantee ensure that data is entered into the system in a timely manner to ensure that Quarterly and Annual Performance Reports are complete and accurate? |  |  |  |  |  |
| Does the subgrantee ensure that the client data are de-duplicated? |  |  |  |  |  |
| Questions for subgrantees that manage the HMIS data collection system  |
| Does the subgrantee ensure that all HPRP provider agencies enter directly, or provide information for timely entry, all of the required data elements? |  |  |  |  |  |
| Does the subgrantee produce regular data quality assurance reports and/or use other trouble shooting mechanisms to verify that the information entered into the system is complete and accurate? |  |  |  |  |  |
| Does the subgrantee provide appropriate technical assistance and training to system users to ensure data quality? |  |  |  |  |  |
| If the subgrantee is managing data for more than one HPRP provider, does the subgrantee ensure that the data are de-duplicated? |  |  |  |  |  |

**Program- Related Requirements**

The requirements related to the implementation of the HPRP program require that subgrantees follow consistent policies either provided by the grantee or developed and implemented by the subgrantee. The grantee should ensure these policies meet the HPRP Notice requirements and any relevant regulations cited therein.

| Policies and/or Documented Practices  | Yes | Partial | No | N/A | Documentation reviewed or other basis for conclusion | Corrections/additions needed |
| --- | --- | --- | --- | --- | --- | --- |
| Confidentiality and Due Process (See page 33 of the HPRP Notice) |
| **Confidentiality:** Does the subgrantee follow a policy and procedure to ensure the confidentially of records pertaining to any individual provided with assistance? |  |  |  |  |  |  |
| **Confidentiality:** Does the subgrantee follow a policy and procedure to ensure that the address of any assisted housing is not made public, except as it conflicts with a preexisting privacy policy of the grantee? |  |  |  |  |  |  |
| **Termination of Housing Assistance:** Does the subgrantee follow the policy and procedure that recognizes due process in terminating assistance and follows the required steps for any program participant that violates program requirements? |  |  |  |  |  |  |
| Conflict of Interest ( For more information, see page 39 of the HPRP Notice) |
| Does the subgrantee comply with federal conflict of interest regulations related to the procurement of services, equipment, supplies and/or other property (24 CFR 85.36(b)(3) for states, territories and units of general local government, and 24 CFR 84.42 for non-profit organizations)?  |  |  |  |  |  |  |
| Does the subgrantee follow a policy and procedure to routinely ensure that no one with a conflict of interest (as defined in the HPRP Notice) receives a personal or financial interest or benefit from any HPRP-funded activity? |  |  |  |  |  |  |
| If there is an exception to the conflict of interest policy, has the grantee sought and obtained a waiver from HUD?  |  |  |  |  |  |  |
| Habitability and Lead Paint (For more information, see pp. 40-41 of the HPRP Notice) |
| **Habitability:** Does the subgrantee use the HPRP habitability standards set forth in the HPRP Notice or a more stringent standard required by the grantee?  |  |  |  |  |  |  |
| **Lead Based Paint** Do the subgrantee’s inspection and assistance practices comply with the Lead-based Paint Poisoning Prevention Act as amended (24 CFR Part 35, A, B, M and R)? Are appropriate staff members certified as LBP Visual Inspectors? |  |  |  |  |  |  |
| Non-Discrimination, Equal Opportunity and Fair Housing (For more information, see pp. 40-42 of the HPRP Notice) |
| **Nondiscrimination and Equal Opportunity Requirements:**  Does the subgrantee have policies and procedures that comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a)? |  |  |  |  |  |  |
| **Fair Housing:** Does the subgrantee affirmatively further fair housing opportunities for classes protected under the fair housing act? (See pp 41-42 of the HPRP Notice for examples of affirmatively furthering fair housing.) |  |  |  |  |  |  |
| Other Federal Requirements ( For more information page 42-45 of the HPRP Notice) |
| **Lobbying and Disclosure:** If the subgrantee engages in lobbying activities, have they used Standard Form LLL to disclose the expenditures?  |  |  |  |  |  |  |
| **Drug Free Workplace:** Does the subgrantee have a drug-free workplace statement per the requirements of 24 CFR 21.200? |  |  |  |  |  |  |

1. According to HUD rules, a “finding” is a violation of law or regulation that can result in a sanction. A “concern” is a matter that, if not properly addressed, can become a finding and can result in a sanction. [↑](#footnote-ref-1)