



Office of Community Development-Disaster Recovery Unit

Supplement to Exhibit 12-4

Supplemental Worksheets for Project Checklist

Revised July 20, 2016

The following Worksheets are to be used in conjunction with the OCD-DRU Compliance Monitoring Project Checklist to review the procurement, contracting, labor and financial management compliance.

Contents

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

WORKSHEET 2: CONTRACTOR LABOR REVIEW

WORKSHEET 3: CONTRACTOR SUPPORT DOCUMENTATION/ALLOWABLE COSTS REVIEW

WORKSHEET 4: SECTION 3 COMPLIANCE

Monitoring Instructions:

1. Select contractors/contracts to be reviewed.
 - a. Select 10% or a minimum of two contractors/contracts.
 - b. If issues are found within the selected sample, broaden the sample to include additional contractors/contracts.
 - c. Document the reasoning for adjusting the sample size, if applicable.
2. Execute each of the Worksheets for each contractor within the sample as described within each Worksheet.

12-4b

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Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirements	Response	Issue Type	Comments
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Monitoring Instructions: Review the Grantee/ Recipient/ Subrecipient’s Procurement Policies and Procedures. Then, answer each question as directed and mark “N/A”, “Finding”, or “Concern” to identify any issues, as applicable. Provide comments for your responses in the identified areas. References and guidance are provided throughout this checklist section and should be used to help the Monitor determine if the standards are being met by the Grantee/ Recipient/ Subrecipient.

THIS WORKSHEET SHOULD BE COMPLETED FOR EACH CONTRACT WITHIN THE SELECTED SAMPLE.
Once all Worksheets are completed, execute Section 7 of the OCD-DRU PIPP Compliance Monitoring Project Checklist.

Documents Needed (For each procurement/contract reviewed):

- Solicitation
 - Any submitted questions and the responses to those questions
 - Advertisement
 - Written evaluation or Score Sheet
- Proposals, Statement of Qualifications, Bids, Quotes, etc.
- Cost/Price Analysis
- Notice of Contract Award
- Contract
- Wage Determination, if applicable
- Documentation of Bid Opening Date, if applicable

Procurement Overview

1. Identify the Procurement Type (Small Purchase, Sealed Bid, Competitive Proposals, or Non-Competitive Proposals)	N/A	N/A	
2. Were any disputes related to procurement actions received?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.1. If yes, were the disputes handled, resolved and disclosed? [24 CFR 85.36(b)(12); 24 CFR 84.84; 2 CFR 200.318(k)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Is there evidence that the procurement was conducted using “open and free competition,” unless an exception applies? [24 CFR 85.36(c); 24 CFR 84.84; 2 CFR 200.319]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Is there evidence that a Notice of Contract Award has been sent to the OCD-DRU within 30 days of award for all prime construction contracts?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5. If procured through the Sealed-Bid Method, was the contract awarded within the time frame established in State Bid Law? (45 days; time frame may be extended in 30-day increments by mutual consent.)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirements	Response	Issue Type	Comments
SMALL PURCHASE REQUIREMENTS			
6. For the Small Purchase method (an option when services are less than \$100,000 and supplies are less than \$30,000), is there evidence of a minimum of three quotes received by phone, fax or mail?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. For the Small Purchase method (an option when services are less than \$150,000 and supplies are less than \$30,000), is there evidence of documentation for basis of selection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
8. For the Small Purchase method (an option when services are less than \$100,000 and supplies are less than \$30,000), is there evidence of justification for acquisition of the services, supplies or equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
COMPETITIVE NEGOTIATION –RFP REQUIREMENTS			
9. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence of the Request for Proposal?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
10. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence of that the RFP was publicized?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
11. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence that Proposals and copies of proposals were received timely?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
12. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence that a written evaluation of each proposal was performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
13. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence costs were analyzed for reasonableness to avoid unnecessary and duplicative purchases? [24 CFR 85.36(f); 2 CFR 200.323]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
14. For the Competitive Negotiation method using " Requests for Proposals ", is there evidence that the selection process was thorough and uniform and the criteria and point system identified in the RFP was used to make the selection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirements	Response	Issue Type	Comments
15. For the Competitive Negotiation method using "Requests for Proposals" , is there evidence of documentation of the reason for rejecting any or all proposals?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
16. For the Competitive Negotiation method using "Request for Proposals" , is there evidence that sufficient records were maintained detailing the procurement history? <i>The records must include but not limited to:</i> <ul style="list-style-type: none"> • <i>Rationale for the method of procurement</i> • <i>Selection of contract type</i> • <i>Contractor selection or rejection</i> • <i>The basis for the contract price</i> 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
17. For the Competitive Negotiation method using "Request for Proposals" , is there evidence that a contract administration system is being maintained to monitor the contractor's performance against terms, conditions and specifications of their contracts or purchase orders?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

COMPETITIVE NEGOTIATION – RFQ REQUIREMENTS

18. For the Competitive Negotiation method using "Statements of Qualifications" , is there evidence of a copy of the Request for Qualifications?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
19. For the Competitive Negotiation method using "Statements of Qualifications" , is there evidence that the RFQ was publicized?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
20. For the Competitive Negotiation method using "Statements of Qualifications" , is there evidence that Statements of qualifications were received timely?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
21. For the Competitive Negotiation method using "Statements of Qualifications" , is there evidence that a written evaluation of each statement was performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
22. For the Competitive Negotiation method using "Statements of Qualifications" , is there evidence of documentation of the reason for rejecting any or all RFQs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient:		Project ID:	Monitor:	Date Completed:
Contractor:				
Requirements	Response	Issue Type	Comments	
23. For the Competitive Negotiation method using " Statements of Qualifications ", is there evidence that costs were analyzed for reasonableness to avoid unnecessary and duplicative purchases? [24 CFR 85.36 (f); 2 CFR 200.323]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
24. For the Competitive Negotiation method using " Statements of Qualifications ", is there evidence of that the selection process was thorough and uniform and the criteria and point system identified in the Request for Qualification Statements was used to make the selection?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
NON-COMPETITIVE NEGOTIATION				
25. For the Non-competitive Negotiation method, is there evidence of prior approval from the OCD-DRU if used to procure services?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
26. For the Non-competitive Negotiation method, is there evidence of the rationale for using this procurement method meets the requirements of 24 CFR 85.36 (d)(4)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
27. For the Non-competitive Negotiation method, is there evidence of justification for services provided?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
28. For the Non-competitive Negotiation method, is there evidence that costs were reviewed for reasonableness to avoid unnecessary and duplicative purchase? [24 CFR 85.36; 24 CFR 84.45, 84.84; 2 CFR 200.320 (f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
SEALED-BID REQUIREMENTS				
29. For the Sealed-Bid method, is there evidence that final plans, specifications, and cost estimates (for construction only) were submitted to the OCD-DRU prior to advertising for bids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
30. For the Sealed-Bid method, is there evidence that an advertisement for bids ("invitation for bids") was published once a week for three weeks with the first ad appearing at least 25 days prior to bid opening?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		
31. For the Sealed-Bid method, is there evidence that the Public bid opening occurred at the time and place set in the advertisement for bids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern		

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient:		Project ID:		Monitor:		Date Completed:	
Contractor:							
Requirements	Response	Issue Type	Comments				
32. For the Sealed-Bid method, is there evidence that the procurement solicitation contained an “Effective Wage Decision”, if applicable? <i>Only applicable if construction-related services (including demolition where construction is anticipated) were procured and no labor standard exception requirements were met.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
33. For the Sealed-Bid method, is there evidence that wage decisions (dated no more than 10 days prior to bid opening) included in all requests and advertisements for bids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
34. For the Sealed-Bid method, is there evidence that minutes of the bid opening were maintained?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
35. For the Sealed-Bid method, is there evidence that a review of each bid was performed (tabulation of bids)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
36. For the Sealed-Bid method, is there documentation of the reason for rejecting any or all bids?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
37. For the Sealed-Bid method, is there evidence that the lowest responsible bidder was selected?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
38. For Procurements for Construction-related services , does the project meet one or more of the Labor Standard exception requirements? <i>If yes, notate the requirement identified below, but mark N/A for questions 40-44.</i> <ul style="list-style-type: none"> • Construction contracts at or below \$2,000 • Rehabilitation or construction of residential structures containing less than eight units; • Simple water and sewer line extensions without pumps, tanks, etc. may also be exempt; • Separate and distinct projects. Contact the OCD-DRU for guidance; • Contracts solely for demolition, when no federally-funded construction is anticipated on the site 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					
39. For Procurements for Construction-related services , were effective wage decisions included in all requests and advertisements, as applicable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern					

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient: **Project ID:** **Monitor:** **Date Completed:**

Contractor:

Requirements	Response	Issue Type	Comments
40. For Procurements for Construction-related services , did the procurement advertisement include a requirement that the Contractor and subcontractors are responsible for compliance with the applicable Nondiscrimination, Equal Employment Opportunity, and Affirmative Action in Employment Requirements?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
41. For Procurements for Construction-related services , did the procurement advertisement include a requirement that the contractor awarded the contract will undertake affirmative efforts to hire women’s business enterprises, minority firms, labor surplus firms and disadvantaged business enterprise? [24 CFR 85.36(e); 24 CFR 84.84; 2 CFR 200.321]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
42. For Procurements for Construction-related services , did the procurement advertisement state that the Contractor and subcontractors are responsible for compliance with the provisions of Section 3 of the Housing and Urban Development Act of 1968?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
43. For Procurements for Construction-related services , did the procurement advertisement include a requirement that the Contractor and subcontractors are responsible for compliance with the provisions of Section 503/504 of the Rehabilitation Act of 1973, as amended?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>Isaac Only Grantees implementing projects utilizing funding from the Hurricane Isaac allocation are required to meet these guidelines.</p>			
44. Does the project include new construction of a residential building or a replacement of a substantially damaged residential building? 44.1. If yes, proceed to <i>Step 46</i> . 44.2.If no, proceed to <i>Step 48</i> .	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
45. Was construction of the residential building complete, under construction, or under contract prior to the date assistance was provided? 45.1.If yes, proceed to <i>Question 48</i> . 45.2.If no, proceed to <i>Question 47</i> .	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient:	Project ID:	Monitor:	Date Completed:
Contractor:			
Requirements	Response	Issue Type	Comments
46. Is there evidence that the Grantee verified that the construction achieved certification under at least one approved green program? Indicate program (<i>i.e.</i> , <i>ENERGY STAR</i> , <i>Enterprise Green Communities</i> , <i>LEED</i> , <i>ICC-700 National Green Building Standard</i> , <i>EPA Indoor AirPlus</i> or any other equivalent comprehensive green building program).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
47. Has the Grantee verified construction follows the guidelines for the Green Building Retrofit Checklist. (<i>This question is not applicable if Question 47 is applicable.</i>)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
Contract Requirements			
1. Identify the Contract Type: (Purchase Order, Fixed Price, Cost Reimbursement, or Time and Material)	N/A	N/A	
1.1. If a “time and material” type contract is used, was a determination made that no other contract is suitable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
1.2. If a “time and material” type contract is used, does the contract include a ceiling price that the contractor may exceed at its own risk? [24 CFR 85.36(b)(10); 2 CFR 200.323]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
1.3. Was “cost plus a percentage of cost” or “percentage of construction cost” pricing used for the contract? <i>Note: This type of contract is not allowed (24 CFR 85.36(f)(4) 84.44 and 2 CFR 200.323(d))</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Does the Contract Scope of Work/Services/ Equipment or Supplies match the Scope of Work/Services included within the procurement solicitation?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Based on the procurement type and equipment or supplies procured or services provided, was the correct contract type executed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Was the contract signed by all required parties?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient:	Project ID:	Monitor:	Date Completed:
Contractor:			
Requirements	Response	Issue Type	Comments
5. Was the Contractor’s status reviewed to ensure that it is not debarred, suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549, “Debarment and Suspension” [24 CFR 85.35; 24 CFR 84.13; 2 CFR 200.180]?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5.1. Is Contractor Clearance Date after Contract Effective Date? <i>Notate the Contractor Clearance Data and Contract Effective Date</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
Contract Requirements			
6. For each contract within the contract sample, does the contract contain Scope of Services?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. For each contract within the contract sample, does the contract contain the Contract amount, with breakout of fees by services?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
8. For each contract within the contract sample, does the contract contain the Method of compensation?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
9. For each contract within the contract sample, does the contract contain the Contract date? <i>(Notate Contract Date)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
10. For each contract within the contract sample, does the contract contain a Section 3 clause?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
11. For each contract within the contract sample, does the contract contain a Equal Opportunity clause?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
12. For each contract within the contract sample, does the contract contain a Termination for Cause, and Convenience provision?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
13. For each contract within the contract sample, does the contract contain a Conflict of Interest clause?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
14. For each contract within the contract sample, does the contract contain an Access to Records provision?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
15. For each contract within the contract sample, does the contract list Executive Order 11246?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

WORKSHEET 1: PROCUREMENT AND CONTRACT REVIEW

Grantee/ Recipient/ Subrecipient:	Project ID:	Monitor:	Date Completed:
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Contractor:

Requirements	Response	Issue Type	Comments
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Isaac Only

Grantees implementing projects utilizing funding from the Hurricane Isaac allocation are required to meet these guidelines.

16. Did the Grantee/Subrecipient include (1) performance measures and penalties and (2) a period of performance in procured contracts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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Labor Contract Requirements

Description: Only applies to construction contracts above \$2,000. Arbitrarily separating a project into individual contracts below \$2,000 in order to avoid the Davis-Bacon and Copeland Act requirements is not permitted.

1. Were wage decisions included within the executed contract?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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2. Does the resulting contract reflect the wage categories for laborers or mechanics, etc., established in the “Effective Wage Decision”?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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2.1. Are the rates for each wage category for laborers or mechanics, etc. in the contract at or above the rates specified in the “Effective Wage Decision”?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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3. Were wage decision lock-in dates established? <i>(Notate the wage lock-in date and bid opening date)</i> <ul style="list-style-type: none"> • For contracts procured through the sealed bid method, the lock-in date is the 10 days prior to bid opening. • For contracts procured through other methods, the lock-in date is the contract award date OR if contract performance commences more than 30 days after award, the lock in date is ten days prior to commencement of the work. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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4. Do the wage decisions from the contract represent the correct time frame?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
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Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 2: CONTRACTOR LABOR REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirements	Response	Issue Type	Comments
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Monitoring Instructions: Review the Grantee/ Recipient/ Subrecipient’s Financial Management Policies and Procedures. Then, select an invoice sample based on transaction-based sampling methodology for the Contractor being reviewed. Answer each question as directed and mark “N/A”, “Finding”, or “Concern” to identify any issues, as applicable. Provide comments for your responses in the identified areas.

THIS WORKSHEET SHOULD BE COMPLETED FOR EACH CONTRACT WITHIN THE SELECTED SAMPLE.
Once all Worksheets are completed, execute Section 8 of the OCD-DRU PIPP Compliance Monitoring Project Checklist.

Documents Needed (for each non-exempt Contractor selected):

- Weekly payroll reports (Two per applicable contractor within contract sample)
- Verification of Wage Decision Form
- Contract (including Wage Decision included within contract)

Payroll Review

<p>1. Is the Contractor exempt from Davis-Bacon and Related Acts and the Copeland Anti-Kickback requirements? If yes, do not execute the remainder of this Worksheet.</p> <p>Must meet one of the following in order to be exempt:</p> <ul style="list-style-type: none"> • Construction contracts at or below \$2,000 • Rehabilitation or construction of residential structures containing less than eight units; • Simple water and sewer line extensions without pumps, tanks, etc. • Separate and distinct projects; or, • Contracts solely for demolition, when no federally-funded construction is anticipated on the site. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Are weekly payroll reports being submitted timely for all employees and subcontractors being paid under the contract?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Do the payroll reports indicate that the contractor/subcontractor employees are being paid timely?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>4. Are the payroll reports accompanied by a signed "Statements of Compliance" from an authorized representative of the Contractor?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>5. Is there evidence that the payroll reports are being reviewed for labor compliance by the Grantee/ Recipient/ Subrecipient's LCO, including reviews for required documentation (HUD Form WH-347), exact worker classifications, wage decisions, and mathematical accuracy?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 2: CONTRACTOR LABOR REVIEW

Grantee/ Recipient/ Subrecipient: **Project ID:** **Monitor:** **Date Completed:**

Contractor:

Requirements	Response	Issue Type	Comments
6. Was a "Verification of Wage Decision" form executed by all grantees/subrecipients prior to the start date of the contract?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. If additional worker classifications have been requested, were the appropriate OCD-DRU procedures followed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

WORKSHEET 3: CONTRACTOR SUPPORT DOCUMENTATION/ALLOWABLE COSTS REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirement	Response	Issue Type	Comments
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Monitoring Instructions: Review the Grantee/ Recipient/ Subrecipient’s Financial Management Policies and Procedures. Then, select an invoice sample based on transaction-based sampling methodology for the Contractor being reviewed. Answer each question as directed and mark “N/A”, “Finding”, or “Concern” to identify any issues, as applicable. Provide comments for your responses in the identified areas.

THIS WORKSHEET SHOULD BE COMPLETED FOR EACH CONTRACT WITHIN THE SELECTED SAMPLE.
Once all Worksheets are completed, execute Section 9 of the OCD-DRU PIPP Compliance Monitoring Project Checklist.

Documents Required:

- Contract
- Required Invoices for each contractor within contract sample¹
 - Use the transaction-based sampling methodology to determine the number of invoices that must be reviewed:
 - Less than 20 invoices have been submitted during the period, select 3
 - If 20 - 49 invoices have been submitted during the period, select 5
 - If 50 - 99 invoices have been submitted during the period, select 10
- Supporting Documentation for each invoice reviewed

¹If no contractors are used to execute the project, Grantee/ Recipient/ Subrecipient documentation identifying use of resources and invoices for supplies, materials, etc. is required to be submitted.

Support Documentation/Allowable Costs Review

1. Is all or a part of the period covered by first invoice prior to the Contract Effective Date? <i>Notate Period covered by first invoice and contract effective date</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2. Invoice Review – Invoice Number	N/A	N/A	
2.1. Date Submitted:	N/A	N/A	
2.2. Submitted by:	N/A	N/A	
2.3. Date Approved:	N/A	N/A	
2.4. Approved by:	N/A	N/A	
2.5. Are Costs Allowable? <i>(Refer to Note 1 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
2.6. Is the Support Documentation Sufficient? <i>(Refer to Note 2 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
3. Invoice Review – Invoice Number	N/A	N/A	
3.1. Date Submitted:	N/A	N/A	
3.2. Submitted by:	N/A	N/A	
3.3. Date Approved:	N/A	N/A	
3.4. Approved by:	N/A	N/A	
3.5. Are Costs Allowable? <i>(Refer to Note 1 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 3: CONTRACTOR SUPPORT DOCUMENTATION/ALLOWABLE COSTS REVIEW

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirement	Response	Issue Type	Comments
3.6. Is the Support Documentation Sufficient? <i>(Refer to Note 2 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4. Invoice Review – Invoice Number	N/A	N/A	
4.1. Date Submitted:	N/A	N/A	
4.2. Submitted by:	N/A	N/A	
4.3. Date Approved:	N/A	N/A	
4.4. Approved by:	N/A	N/A	
4.5. Are Costs Allowable? <i>(Refer to Note 1 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
4.6. Is the Support Documentation Sufficient? <i>(Refer to Note 2 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5. Invoice Review – Invoice Number	N/A	N/A	
5.1. Date Submitted:	N/A	N/A	
5.2. Submitted by:	N/A	N/A	
5.3. Date Approved:	N/A	N/A	
5.4. Approved by:	N/A	N/A	
5.5. Are Costs Allowable? <i>(Refer to Note 1 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5.6. Is the Support Documentation Sufficient? <i>(Refer to Note 2 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6. Invoice Review – Invoice Number	N/A	N/A	
6.1. Date Submitted:	N/A	N/A	
6.2. Submitted by:	N/A	N/A	
6.3. Date Approved:	N/A	N/A	
6.4. Approved by:	N/A	N/A	
6.5. Are Costs Allowable? <i>(Refer to Note 1 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6.6. Is the Support Documentation Sufficient? <i>(Refer to Note 2 below for guidance)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

Note 1: A cost is allowable under the CDBG program if:

- The expenditure is necessary, reasonable, and directly related to the grant.
- The expenditure has been authorized by the Grantee/ Recipient/ Subrecipient (the city or parish that provides the CDBG funds to the Grantee/ Recipient/ Subrecipient), generally through approval of the budget for the activity.
- The expenditure is not prohibited under Federal, state, or local laws or regulations (2 CFR 200.405).
- The expenditure is consistently treated, in the sense that the Grantee/ Recipient/ Subrecipient applies generally accepted accounting standards in computing the cost, and utilizes the same procedures in calculating costs as for its non-Federally assisted activities.
- The cost must be allocable to the CDBG program. A cost is allocable to a particular cost objective (e.g., grant, program, or activity) in proportion to the relative benefits received by that objective.

Note 2: Sufficient Support Documentation

- **Payrolls:** Source documentation should include employment letters and all authorizations for rates of pay, benefits, and employee withholdings. Such documentation might include union agreements or minutes from board of directors' meetings where salary schedules and benefit packages are established, copies of written personnel policies, W-4 forms, etc. For staff time charged to the CDBG program activity, **time and attendance records should be available.** If an employee's time is split between CDBG and another funding source, there must be time distribution records supporting the allocation of charges among the sources. Canceled checks from the employees, insurance provider, etc., or evidence of direct deposits will document the actual outlay of funds.
- **Cost of space and utilities:** Space costs must be supported by documentation such as rental or lease agreements. Utility costs will be supported by bills from the utility companies. Both types of expenses will be supported by canceled checks. If the cost of space or utilities is split between the CDBG program and other sources, there must be a reasonable method in place to allocate the charges fairly among the sources, consistent with the guidelines covering allocable costs.
- **Supplies:** Documentation would include purchase orders or requisition forms initiated by an authorized representative of the Grantee/ Recipient/ Subrecipient, an invoice from the vendor (which has been signed-off by the Grantee/ Recipient/ Subrecipient to indicate the goods were received), the canceled check from the vendor demonstrating payment was made, and information regarding where the supplies are being stored and for what cost objective(s) they are being used.

WORKSHEET 4: SECTION 3 COMPLIANCE

Grantee/ Recipient/ Subrecipient:	Project ID:	Monitor:	Date Completed:
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Contractor:

Requirement	Response	Issue Type	Comments
<p>Description: Section 3 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701u and 24 CFR Part 135] is HUD’s legislative directive for providing preference to low- and very low-income residents of the local community (regardless of race or gender), and the businesses that substantially employ these persons, for new employment, training, and contracting opportunities resulting from HUD-funded projects. A “covered project” is a project for which Section 3 applies. “Covered funds” are those funds used to fund a “covered project”.</p> <p><i>Section 3 Residents are:</i></p> <ul style="list-style-type: none"> • Residents of Public and Indian Housing, or • Individuals that reside in the metropolitan area or nonmetropolitan parish in which the Section 3 covered assistance is expended and whose income does not exceed the local HUD income limits set forth for low- or very low-income households. <p><i>Section 3 Business Concerns are One of the Following:</i></p> <ul style="list-style-type: none"> • Businesses that are 51 percent or more owned by Section 3 residents; • Businesses with 30 percent or more permanent, full-time employees whom are currently Section 3 residents, or were Section 3 residents within three years of the date of first employment; or • Businesses that provide evidence of a commitment to subcontract in excess of 25 percent of the dollar amount of all subcontracts to be awarded to businesses that meet the qualifications described above. <p>Monitoring Instructions: Complete the following questions by marking the appropriate box for “Yes”, “No”, or “N/A”. As applicable, mark “N/A”, “Finding” or “Concern” to identify any issues. Provide comments describing the basis for your response in the space provided.</p> <p>Required:</p> <ul style="list-style-type: none"> • Knowledge of Grantee/ Recipient/ Subrecipient’s total allocation and all project activities • Executed Worksheet 1 for the contractor (or the applicable procurement solicitation) • Contract • Contractor’s Section 3 Plan 			
<p>1. Has the Grantee/ Recipient/ Subrecipient allocated \$200,000 or more DR-CDBG funds into projects/activities involving housing construction, demolition, rehabilitation, or other public construction—i.e., roads, sewers, community centers, etc.? (See the Core Checklist, Section 5.5.) <i>If no, the remaining questions within Worksheet 4 are not applicable.</i></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>2. Was a Section 3 clause included in the procurement solicitation for this contractor? (See Worksheet 1, Procurement Requirements: Question 43)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
<p>3. Was a Section 3 clause included in this contractor’s contract? (See Worksheet 1, Contract Requirements: Question 6.5)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 4: SECTION 3 COMPLIANCE

Grantee/ Recipient/ Subrecipient: _____ **Project ID:** _____ **Monitor:** _____ **Date Completed:** _____

Contractor: _____

Requirement	Response	Issue Type	Comments
4. Has the contractor been allocated \$100,000 or more DR-CDBG funds into projects/activities involving housing construction, demolition, rehabilitation, or other public construction—i.e., roads, sewers, community centers, etc.? <i>If no, the remaining questions within this Section are not applicable.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
5. Does the contractor have written procedures (i.e., “Section 3 Plan”) governing how Section 3 residents are to be notified about employment and training opportunities generated by program participant or its contractors as a result of the expenditure of covered financial assistance? [24CFR 135.32 (a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
6. Does the contractor have written procedures (i.e., “Section 3 Plan”) governing how Section 3 business concerns are to be notified about contracting (or subcontracting) opportunities generated by the program participant or its contractors involving covered financial assistance? [24 CFR 135.32 (a)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
7. Does the contractor have written procedures (i.e., “Section 3 Plan”) governing how potential contractors for covered projects or subrecipients of covered funds are to be notified about their requirements pursuant to Section 3? [24 CFR 135.32(b) and 24 CFR 135.32(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
8. Does the contractor have written procedures (i.e., “Section 3 Plan”) governing how covered subcontractors are to be monitored for compliance with the requirements of Section 3? [24 CFR 135.32(d) and 24 CFR 135.32(f)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
9. Does the Grantee/ Recipient/ Subrecipient have written procedures (i.e., “Section 3 Plan”) describing the steps taken to facilitate meeting the minimum numerical goals for employment and contracting opportunities? [24 CFR 135.32(c)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
10. New Hire Goal – Has the contractor hired employees to work on this project?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
10.1. If yes, were at least 30% of the new hires Section 3 residents?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

Compliance Monitoring Project Checklist Template - SUPPLEMENTAL WORKSHEETS

WORKSHEET 4: SECTION 3 COMPLIANCE

Grantee/ Recipient/ Subrecipient:	Project ID:	Monitor:	Date Completed:
Contractor:			
Requirement	Response	Issue Type	Comments
10.2. If Question 10.1 is “No”, has the contractor demonstrated that, to the greatest extent feasible, they have made an effort to ensure that the employment objectives of their Section 3 plan are met?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
11. Contracting Goal - Has the contractor entered into any contracts to execute this Project?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
11.1. If question 11 is “Yes”, was at least 10% of the total construction contract amount awarded to Section 3 construction contractors and at least 3% of the total non-construction contract amount awarded to Section 3 businesses?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	
11.2. If Question 11.1 is “No”, has the contractor demonstrated that, to the greatest extent feasible, it has made an effort to ensure that the contracting objectives of its Section 3 Plan are met?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A <input type="checkbox"/> Finding <input type="checkbox"/> Concern	

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