



## COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAMS

333 Broadalbin Street SW, PO Box 490, Albany, Oregon 97321-0144 | PLANNING 541-917-7550; [cd.customerservice@cityofalbany.net](mailto:cd.customerservice@cityofalbany.net)

### Subrecipient Activity File Checklist

The following checklist includes required and recommended documentation to keep in CDBG-funded activity files. Items with citations are required by Federal rules ([24 CFR 570 Subpart J](#) and [Subpart K](#), and 2 CFR 200 [Subpart D Financial Management and Internal Controls](#) and [Subpart E](#) Federal Cost Principles). Documentation of agency administrative policies/procedures help the City assess whether the agency has adequate and effective internal control systems to ensure funds are used for eligible activities and expenses and in compliance with CDBG and federal standards.

#### Administrative Systems and Internal Controls

- Articles of Incorporation/Bylaws
- Board of Directors Roster (Current) and handbook (if applicable)
- Organizational Chart
- Job Descriptions/Resumes for positions funded with CDBG
- Insurance Coverage (approved by city risk assessor and renewals)

#### Required Policies and Procedures (Please contact City staff for sample policies and procedures):

- Procurement or Purchasing Policies/Procedures [*§200.318-324*] - *could be in financial procedures*
- Conflict of Interest Policy [*§200.318(c)(1) and §570.611*]
- Non-Discrimination Policy [*§570.602 & 618*]- to comply with all Civil Rights Acts and Executive Orders, and Oregon law.
- Grievance/Termination Policies – staff and clients [*§570.607(a)*]
- Record Retention Policy [*§570.506*]
- Confidentiality Policy [*§200.303(e)*]

#### Financial Management Systems

- Current Approved Budget
- Chart of Accounts [*§200.302(b)*] or ledgers identifying where CDBG \$ is received and expended and the programs under which they were received, if applicable
- Financial procedures/internal controls over financial transactions
- Financial reports (profit/loss statements)
- Reimbursement Requests include documentation (receipts, income/expense reports, payroll )
- Payroll records – timesheets, salaries
- Program Income Ledger and/or Revolving Loan Fund Ledger [*as defined in §570.500(a) and 570.504*] – if applicable for loan repayments, sale or lease of property purchased with CDBG, etc.)
- Most recent Form 990 or Form 990-N (with application)
- Most recent Audit if federal expenditures exceed \$750,000 [*§200.501*]

**[www.cityofalbany.net/cdbg](http://www.cityofalbany.net/cdbg) - visit the "For Agencies" tab  
<https://www.hudexchange.info/programs/cdbg-entitlement/>**



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### **CDBG and Federal Regulations Compliance**

IRS 501(c)3 Tax Exempt Letter for Nonprofits

Duns # and SAM.GOV active status

Application - signed CDBG Certifications; authorization to request funds [*§200.324(c)*, *§200.415*],

CDBG Award Letter/Email

Environmental Review Record [*§58.34(a)* and *§570.604*] - *Supplied by City*

**Subrecipient Agreement [*§570.503(a)*] – Signed executed copy supplied by City**

Amendments to Subrecipient Agreement – *Signed executed copy supplied by City*

§570 and §200 certifications in the Subrecipient Agreement (**ensure agency complies with these!**)

Anti-Lobbying Certification [*§200.415(d)*]

Anti-discrimination [*§570.602*]

Equal Employment Opportunity [*§570.607*]

ADA/Section 504 Compliance [*§570.614*] – facility accessibility

Record Retention [*§570.506* and *§200.334-338*]

Others as required by the Subrecipient Agreement

### Other 570 Subpart K Requirements when applicable:

Fair Housing Act Compliance [*§570.601-602*] – housing activities policies and procedures

Lead-Based Paint Compliance [*§570.608*] – housing activities policies and procedures

Davis Bacon and Related Acts compliance – construction contracts over \$2,000, excluding residential rehab of less than 8 units

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 – compliance with City Relocation Plan and Act

Use of Debarred or Ineligible Contractors [*§570.609*]

Section 3, Women and Minority owned Businesses Employment [*§570.904* and *200.321*]

### **Performance Outcomes/Client Documentation (24 CFR 570.506)**

Quarterly Performance Reports- progress towards activity outcomes, number of persons assisted during reporting period and achieving activity objectives, issues, etc. [*§200.329*]

Client Intake Forms and/or Client Certification Forms (Individuals or Households for housing activities) that documents income, race, ethnicity, etc.

HUD Income Limits Chart **with Date** - *Supplied by City and on Client Certification Forms*

Income verification for clients not presumed to be low-mod

Annual Report and Closeout Certification [*§200.344* and *200.415(a)*]

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