

### **File Checklist for Subrecipients**

- National Objective Documentation (570.200(2))
- Environmental Review Record (58.34(a))
- UEI and SAM Registration
- Non-Profit Determination (if applicable)
- Disbarment Eligibility
- Subrecipient Agreement
- Subrecipient Amendments
- Subrecipient Certifications: Anti-discrimination, Fair Housing, ADA/Section 504, EEO, and any others required by terms of subrecipient agreement
- Job Descriptions (for staff listed in CDBG budget only)
- Staff Resumes (if positions are filled)
- Project Application
- Pre-Award Risk Assessment (200.331(6)(b))

### ***Administrative Systems***

- Articles of Incorporation/Bylaws
- IRS 501(c)3 letter
- Board of Directors Roster
- Authorization to Request Funds from Board
- Designation of Authorized Official
- Organization Chart
- Organizational Mission Statement and/or Strategic Plan
- Conflict of Interest Policy (200.318(c)(1))
- Non-Discrimination Policy
- Grievance/Termination Policy for Employees and Clients
- Procurement Policy (200.318(a))
- Record Retention Policy
- Confidentiality Policy – Protected Personal Information (200.393(e))
- Certificates of Insurance (General Liability and Workers' Compensation)
- Certification regarding Debarment/Lobbying

### ***Financial Management Systems***

- Most recent audit (if federal expenditures exceed \$750,000) or Statement from CPA (if federal expenditures do not exceed \$750,000)
- Current Approved Budget for Activity
- Financial Status Report
- Chart of Accounts
- Documentation of Match (if applicable)
- Documentation of Negotiated Indirect Cost Rate (if applicable)
- Program Income Tracking Ledger (if applicable)
- Payroll records – timesheets, salary schedule (if applicable)
- Payment Requests

***Client Documentation***

- Dated HUD-Approved Income Chart
- Example/blank Client Intake Forms – Subrecipient to keep all client intake forms onsite utilizing required confidentiality protocols
- Number of persons assisted (for non-housing activities): income, race, and ethnicity
- Number of households assisted (for housing activities): income, race, ethnicity, female head of household

***Reporting***

- Copies of all subrecipient reports submitted to the City
- Correspondence – copies of emails, letters, and phone call notes

***Compliance Documents – Documentation that subrecipient received***

- Playing by the Rules, a Handbook for CDBG Subrecipients
- Governing regulations, 2 CFR Part 200, CPD Notices
- Information on program changes and new or revised requirements to subrecipient

***Training Log***

- Training log outline number of persons trained, topics, and training date(s)

***Monitoring Documents***

- Monitoring Letter
- Monitoring Conclusions Letter
- Any response to findings/concerns from subrecipient

*Note: Checklist is meant as an internal tool for standardizing and reviewing files. Due to the nature of differing projects, not all items are applicable to all projects at all times.*