# Appendix C: National Objective

Checklist C1: Guide for Review of National Objective of Low- and Moderate-Income Area Benefit

Checklist C2: Guide for Review of National Objective of Low- and Moderate-Income Limited Clientele

Checklist C3: Guide for Review of National Objective of Low- and Moderate-Income Housing

Checklist C4: Guide for Review of National Objective of Low- and Moderate-Income Job Creation/Retention Activities

Checklist C5: Guide for Review of National Objective of Area Slums or Blight

Checklist C6: Guide for Review of National Objective of Spot Slums or Blight

Checklist C7: Guide for Review of National Objective of Slums or Blight for an Activity In An Urban Renewal Plan

Checklist C8: Guide for Review of National Objective for Urgent Needs

## Checklist C1: Guide for Review of National Objective of Low- and Moderate-Income Area Benefit

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are classified by the Monitored Entity as meeting the national objective of benefit to low- and moderate-income persons on an area basis. The Checklist is divided into seven sections: Service Area; Low- and Moderate-Income Composition of the Service Area; Exception Criteria; Data and Surveys; Nature of Activity; Fees; and Record-Keeping/Visual Inspection. One Checklist is to be completed for each activity reviewed. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

A. SERVICE AREA

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Monitored Entity’s records describe the boundaries of the service area? [24 CFR 570.208(a)(1) and 24 CFR 570.506(b)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the basis/approach the Monitored Entity used in determining the service area of this activity meet the applicable requirements? [24 CFR 570.208(a)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the size of the service area appear reasonable given the nature and scope of the activity? [24 CFR 570.208(a)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the service area “primarily residential?” [24 CFR 570.208(a)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

B. LOW- AND MODERATE-INCOME COMPOSITION OF THE SERVICE AREA

**NOTE**: Questions 5-6 are applicable to Entitlement Communities only.

5.

|  |
| --- |
| What do the Monitored Entity’s records show as the percent of low- and moderate-income residents in this service area?  |
| **Describe Basis for Conclusion:** |
|       |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is the percent of low- and moderate-income persons at least 51 percent? (If “yes,” go to “6.e.”)[24 CFR 570.208(a)(1)(i), (ii), and (vii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |
| b. If the answer to “6.a.” above is “no,” was the Monitored Entity authorized to qualify the activity under the “exception criteria?” (If the answer to “6.b.” is “yes,” proceed to Section C of this Checklist, “Exception Criteria.”)[24 CFR 570.208(a)(vi), (vii); 570.208(d)(5)(i); or 570.208(d)(6)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |
| c. If the answer to “6.b.” above is “no,” was the activity limited to paying special assessments levied against residential properties, owned and occupied by low- and moderate-income persons, for a public improvement that benefits all residents of a service area?[24 CFR 570.208(a)(1)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| d. If the answer to “6.c.” above is “yes,” does the activity meet the requirements of 24 CFR 570.208(a)(1)(iv) and 570.506(a) and (b)? (If the answer is “no,” the activity does not meet the low- and moderate-income area benefit national objective.)[24 CFR 570.208(a)(1)(iv); 570.506(a) and (b)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| e. Does the Monitored Entity’s documentation show that the correct census data were used and the calculations correctly computed?[24 CFR 570.208(a)(1)(i) and (ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| f. If the answer to “e.” is “no,” was the Monitored Entity authorized to use a survey to qualify the activity? (If the answer is “yes,” proceed to Section D of this Checklist, “Data and Surveys.”)[24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

C. EXCEPTION CRITERIA

Section 105(c)(2)(A)(ii) of the HCD Act of 1974, as amended, states than an activity shall be considered to principally benefit low- and moderate-income persons when “the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low and moderate income.” The CDBG regulations at 24 CFR 570.208(a)(1)(ii) implement section 105(c)(2)(A)(ii) and describe the methodology for calculating the exception percentage. For exception-qualified Monitored Entities, HUD will post the exception percentages for Monitored Entity area benefit activities at [**https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-exception-grantees**](https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-exception-grantees). The Integrated Disbursements and Information System (IDIS) will also track projects for exception Monitored Entities. The Reviewer is required to review these percentages as calculated by HUD, unless a HUD-approved survey has been conducted by the Monitored Entity.

7.

|  |
| --- |
| If applicable, what is the Monitored Entity’s exception percentage for low- and moderate-income area benefit activities?  |
| **Describe Basis for Conclusion:** |
|  |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the Monitored Entity qualified this activity under the exception criteria, does the percentage of low- and moderate-income residents residing in the activity service area equal or exceed the percentage in question 7 above? (If “no,” the activity does not quality under this criterion.)[24 CFR 570.208(a)(1)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |

D. DATA AND SURVEYS

**NOTE:** For “exception rule” Monitored Entities, survey data may be used to show that the service area contains at least 51 percent low- and moderate-income residents. However, survey data that show a service area exceeding the Monitored Entity’s authorized upper quartile percentage as shown in C.7 above, but are less than 51 percent low- and moderate-income, can only be accepted if all of the Monitored Entity’s block groups were also surveyed, using a methodology acceptable to HUD, and a new upper quartile properly calculated based on those data.

9.

|  |
| --- |
| If the Monitored Entity used a survey rather than the HUD-supplied Census data to determine if a service area qualifies, answer the following: |
| 1. The period for which the income survey of residents of the service area was determined:
 |
| 1. The year used for HUD income limits:

  |
| 1. Did the survey show the service area was at least 51 percent low- and moderate-income?

[24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |
| 1. If “no” to c., did the Monitored Entity survey one or more whole block groups?

[24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |
| 1. If “yes” to d., did the Monitored Entity survey all block groups and re-rank them to determine if there was a change in the exception percentage? (If “no,” use of the survey is not acceptable.)

[24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| 1. If “no” to d., did the survey show that the percentage of low- and moderate-income residents was at least equal to or greater than the Monitored Entity’s exception percent, but less than 51 percent low- and moderate-income? (If “no”, the activity does not meet the National Objective.)

[24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If a survey was used to determine the percent of low- and moderate-income residents in the service area, did the CPD Field Office review the survey instrument and methodology and conclude “that the results meet the standards of statistical reliability that are comparable to the American Community Survey (ACS) Low- and Moderate-Income Sample Data (LMISD) for areas of similar size?” [24 CFR 570.208(a)(1)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |

E. NATURE OF ACTIVITY

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity appear to benefit the residents located within the service area, where at least 51 percent are low- and moderate-income persons, or within the Monitored Entity’s exception percentage, as identified in question 7 above?[24 CFR 570.208(a)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

F. FEES

12.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If the activity is a facility or service, are fees charged? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes,” how much is charged to use the facility or service?  |
| c. If fees are charged, are they set so as not to preclude low- and moderate-income persons from using the facility or service? [24 CFR 570.200(b)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

G. RECORD-KEEPING/VISUAL INSPECTION

13

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information and documentation contained in the Monitored Entity’s most recently completed Quarterly Report for the activity? [24 CFR 91.525(a)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

14.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  If you inspected the service area/activity location, is there substantial evidence that the activity benefits low- and moderate-income persons in the identified area? [24 CFR 570.208(a)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity meet the national objective criteria for serving a low- and moderate-income area? [24 CFR 570.208(a)(1) and 24 CFR 570.506] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

## Checklist C2: Guide for Review of National Objective of Low- and Moderate-Income Limited Clientele

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are classified by the Monitored Entity as meeting the national objective of benefiting a low- and moderate-income limited clientele. One Checklist is to be completed for each activity reviewed. If the answer to question 7 is negative, the appropriate corrective action may result in the use of another national objective Checklist, based upon the the Reviewer’s analysis. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

1.

|  |
| --- |
| Under what limited clientele category has the Monitored Entity classified this activity (presumed benefit, family size and income, low- and moderate-income eligibility restrictions, or nature and location)?  |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. I the activity is classified as presumed benefit, do the Monitored Entity’s files have documentation showing that the activity is limited to one or a combination of the 8 population segments presumed to be low- and moderate-income by HUD:
	* abused children?
	* battered spouses?
	* elderly persons?
	* adults meeting the Bureau of the Census’ Population Report’s definition of “severely disabled” (current for the time period of this review)?
	* homeless persons?
	* illiterate adults?
	* persons living with AIDS?
	* migrant farm workers?

[24 CFR 570.208(a)(2)(i)(A) and 24 CFR 570.506(b)(3)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| b. If “yes”, what segment(s) of the population is/are served by the activity? |
| **Describe Basis for Conclusion:** |
|       |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. If the activity is classified under family size and income, does the Monitored Entity’s files have documentation showing that at least 51% of the beneficiaries are members of a low- and moderate-income family?

[24 CFR 570.208(a)(2)(i)(B) and 24 CFR 570.506(b)(3)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. If the activity is classified based on income eligibility requirements that restrict it exclusively to low- and moderate-income persons, do the Monitored Entity’s files have documentation to support that all persons benefiting are low- and moderate-income?

[24 CFR 570.208(a)(2)(i)(C) and 24 CFR 570.506(b)(3)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. If the activity was classified based on income, were the appropriate Section 8 income limits used by the Monitored Entity when checking the income of the persons served (the correct year and the correct family size)?

[24 CFR 570.3; 24 CFR 570.208(a)(2)(i)(B) or (C); and 24 CFR 570.506(b)(3)(iii)] |

|  |  |  |
| --- | --- | --- |
|  |  |  |
|  |  |  |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity is classified based on the nature and location of the activity, does the Monitored Entity’s files have documentation to support that the beneficiaries are predominately low- and moderate-income? [24 CFR 570.208(a)(2)(i)(D) and 24 CFR 570.506(b)(3)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information contained in the Monitored Entity’s most recently-completed Quarterly Report for the activity?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If you inspected the facility/service, is there evidence to indicate that this activity predominately or exclusively benefits low- and moderate-income persons, based upon the category of presumed benefit selected by the Monitored Entity? [24 CFR 570.208(a)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is the activity properly classified as limited clientele? [24 CFR 570.208(a)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

## Checklist C3: Guide for Review of National Objective of Low- and Moderate-Income Housing

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance (**except for question 8.d).** All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are classified by the Monitored Entity as meeting the national objective of providing housing to low- and moderate-income persons. One Checklist is to be completed for each activity reviewed. The Checklist is divided into six sections: Classification and Property Information; Written Agreement(s); Owner-Occupied Structures; Rental Buildings; Multi-Family Structures; and Report Validation and Verification.

**Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

A. CLASSIFICATION AND PROPERTY INFORMATION

1.

|  |
| --- |
| Which eligibility category (570.201 – 570.204) was used by the Monitored Entity to classify the activity?  |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the property contain existing housing units or structures?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If the property has no structures, describe how the Monitored Entity will ensure that the national objective criteria will be met when the property is developed. [24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(v)] |
| **Describe Basis for Conclusion:**      |
|  |

B. WRITTEN AGREEMENT(S)

**NOTE**: If the activity involves only owner-occupied housing, skip to Section C.

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there a written agreement with a landlord or developer for development of the property? [24 CFR 570.506(b)(4)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Does the written agreement indicate the total number of dwelling units in each structure and the total number of units that will be occupied by low- and moderate-income households following the completion of the assisted activity? [24 CFR 570.506(b)(4)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. Does the Monitored Entity have a reporting mechanism to ensure that the activity will comply with the occupancy requirements?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

C. OWNER-OCCUPIED STRUCTURES

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve owner-occupied structures? (If “no”, skip to Section D. Rental Buildings.) |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Does the documentation show that each assisted structure met the requirements for occupancy by low- and moderate-income households? [24 CFR 570.208(a)(3) and 570.506(b)(4)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. Was income eligibility determined by projecting annual household income (as required at 24 CFR 570.3) and using one of the following two methods: (1) The Section 8 “annual income” definition at 24 CFR 5.609;(2) The “adjusted gross income” from IRS Form 1040?**NOTE:** The Census Long-Form definition is not applicable as of the 2010 Census. |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| d. Were the appropriate Section 8 income limits and household size used to determine if the unit was occupied by a low- and moderate-income household? [24 CFR 570.506(b)(4)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

D. RENTAL BUILDINGS

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve rental buildings? If “no”, skip to Section E. Multi-Family Structures. |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Does the Monitored Entity’s documentation contain the amount of rent charged (or to be charged for unfinished projects) after assistance for each dwelling unit occupied by a low- and moderate-income household in each assisted structure? [24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(iv)(A)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. Does the Monitored Entity’s documentation contain the affordable rents criteria? [24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(iv)(A) and (B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Do the rents for the units occupied by low- and moderate-income households meet the Grantee’s affordability standard?

[24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(iv)(B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there more than one rental building being assisted? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If the response to “6.a.” above is “yes,” is the Monitored Entity treating the two or more rental buildings as one structure? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. If the response to “6.b.” above is “yes,” are the buildings: * under common ownership and management AND
* located on the same or contiguous properties?

[24 CFR 570.208(a)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the documentation show that at least 51 percent of the rental units were initially occupied by low- and moderate-income households?[24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

E. MULTI-FAMILY STRUCTURES

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Does the assisted activity involve multi-family structures? (If “no”, skip to Section F. Report Validation and Verification.) |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If the assisted activity is a two-unit structure, was at least one unit initially occupied by a low- and moderate-income household? [24 CFR 570.208(a)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. For structures with more than two units, complete the following table:

|  |  |  |  |
| --- | --- | --- | --- |
| **Structure Name or Address/Number** | **Number of Units in Structure** | **Number of Units Occupied by L/M Households** | **% of Units in Structure Occupied by L/M Households** |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |
|       |       |       |       |

 |
| d. For “c” above, were at least 51 percent of the units initially occupied by low- and moderate-income households? **NOTE**: If the answer to this question is “no,” but there is evidence that the activity meets the criteria in “e” below, a finding **cannot** be made. If the answer is “yes,” ensure that the Monitored Entity maintains documentation showing the family size and household income for the identified Low/Mod units.[24 CFR 570.208(a)(3) and 24 CFR 570.506(b)(4)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. If less than 51 percent of the initial occupants were low and moderate income, does the activity meet ALL of the following requirements:
2. The CDBG assistance was used to reduce the development cost of the new construction of a multi-family, non-elderly rental housing project; **and**
3. At least 20% of the units are (or will be) occupied by low- and moderate-income households at affordable rents; **and**
4. The proportion of the CDBG funding is not greater than the percentage of low- and moderate-income units?
5. Calculate compliance for “iii” above as follows
6. Total development cost of the activity (including CDBG funds):
7. Amount of CDBG funds:
8. Proportion CDBG represents of total development cost(2 ÷ 1): %
9. Percentage of units in the project occupied by low- and moderate-income households: %

If the percentage on line 4. is greater than or equal to the percentage on line 3., the activity meets the low- and moderate-income housing national objective under 570.208(a)(3)(i). [24 CFR 570.208(a)(3)(i) and 24 CFR 570.506(b)(4)(vi)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| f. Were the appropriate Section 8 income limits and household size used to determine the number of units initially occupied by low- and moderate-income households? [24 CFR 570.506(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records show that multifamily housing activities have, at a minimum, been spot-checked by the Monitored Entity to verify claimed levels of initial occupancy by low- and moderate-income households in each structure? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

F. REPORT VALIDATION AND VERIFICATION

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records and documentation validate the information contained in the most recently completed Quarterly Report for the activity?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

## Checklist C4: Guide for Review of National Objective of Low- and Moderate-Income Job Creation/Retention Activities

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. **Except for questions “4.b, “8.b,” and “9,”** all other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities the Monitored Entity has classified as meeting the national objective of low- and moderate-income job creation/retention activities. The Checklist is broken into nine sections. The Reviewer may complete only those sections applicable to the subject activity as follows:

* Job Creation: General;
* Job Creation: Activity Incomplete;
* Job Creation: Completed Activity;
* Job Creation: To Be Made Available To Low/Mod Persons;
* Job Creation: Combining “Held By” and “Available To;”
* Job Retention General;
* Job Retention: If Two or More Years Have Elapsed Since the Provision of CDBG Assistance for Retained Jobs;
* Job Retention: If Less than Two Years Have Elapsed Since the Provision of CDBG Assistance for Retained Jobs; and
* Report Validation.

**Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions**

A. Job Creation: GENERAL

1.

|  |
| --- |
| What is the date (MM/DD/YYYY) when the CDBG assistance was first obligated for this activity? |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If the assisted activity is to meet the national objective based on jobs being held by low- and moderate-income persons, is there a written agreement between the Monitored Entity and the assisted business that commits the business to have at least 51% of the jobs, on a full-time equivalent basis, to be held by low- and moderate-income persons?[24 CFR 570.506(b)(5)(ii)(A)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Does the agreement contain a listing by job title of the permanent jobs to be created, identifying which are part-time, if any?[24 CFR 570.506(b)(5)(ii)(A)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. Does the Monitored Entity have a method or system for tracking the business’s progress in meeting its responsibilities under the agreement? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| d. If the activity includes part-time jobs, were they computed on a full-time equivalent (FTE) basis using 40 hours as an FTE (e.g., a 20 hour per week job equals 1/2 of a job)? [24 CFR 570.208(a)(4) and 24 CFR 570.506(b)(5)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| e. If this activity includes temporary jobs, were they excluded from the job figures? [24 CFR 570.208(a)(4) and 24 CFR 570.506(b)(5)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| f. If the answers to either “2.d.” or “2.e.” are “no,” calculate the correct number of jobs for this assisted activity, converting the part-time jobs to a full-time equivalent basis and/or omitting all temporary jobs. |
| **Describe Basis for Conclusion:** |
|       |

b. Job Creation: Activity Incomplete

**NOTE:** If this activity is not yet complete, end review with question 3. If it is complete, skip to Section D. “Complete” means that all CDBG funds have been expended and the jobs to be created/retained as a result of the assistance have been realized.

3.

|  |
| --- |
| a. If the activity is not complete (more jobs are expected to be created), what is the anticipated completion date? |
| b. Does it appear that the low- and moderate-income jobs commitment will be met?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

c. Job Creation: Completed Activity

4.

|  |
| --- |
| a. If the activity is considered completed (i.e., all financial commitments have been expended and no additional jobs are expected to result from the CDBG-assisted activity), how many permanent FTE jobs were actually created? |
| 1. Were at least 51 percent of the permanent jobs created initially held by low- and moderate-income persons on a FTE basis?

**NOTE:** If the assisted activity can be shown to meet the “made available to” requirement in questions 8.b. or 9. below, a finding **cannot** be made for this question.)[24 CFR 570.208(a)(4)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there documentation showing a listing by job title of the permanent jobs filled and which jobs were initially held by low- and moderate-income persons?[24 CFR 570.506(b)(5)(ii)(B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Is there documentation showing, for each low- and moderate-income person hired, the size and annual income of the person’s family prior to the person being hired for the job **OR** is theredocumentation showing a presumed benefit was used, based on the census tract where the person resides or the business is located per 24 CFR 570.208(a)(4)(iv)(A) and/or (B)?[24 CFR 570.506(b)(5)(ii)(C) or 24 CFR 570.506(b)(7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. Were the correct Section 8 income limits for family size and income used at the time the low- and moderate-income person applied and/or was hired for the job **OR** was the person presumed to be low and moderate income based on the census tract criteria set forth at 24 CFR 570.208(a)(4)(v), as applicable? [24 CFR 570.3 or 24 CFR 570.506(b)(1) and (7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

d. Job Creation: To be Made Available TO Low/Mod Persons

**NOTE**: If this option is not applicable, skip to Section F.

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If the assisted activity is to meet the national objective based on jobs being made “available to” low- and moderate-income persons, is there a written agreement between the Monitored Entity (or subrecipient) and the business that contains a commitment that the business will make at least 51 percent of the jobs available to low- and moderate-income persons and will provide training for any jobs requiring special skills and education?[24 CFR 570.506(b)(5)(i)(A)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| 1. Does the written agreement contain:
	* a listing by job title of the permanent jobs to be created;
	* which jobs (if any) are part-time;
	* which jobs will be made available to low- and moderate-income persons; and
	* which of those jobs require special skills or education?

[24 CFR 570.506(b)(5)(i)(A)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| c. Does the written agreement contain a commitment by the business and a description of the actions to be taken by the Monitored Entity and the business to ensure that first consideration will be given to low- and moderate-income persons? [24 CFR 570.506(b)(5)(i)(A)(1) and (3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| d. How does the Monitored Entity track the business’s progress in meeting its contractual responsibilities? |
| **Describe Basis for Conclusion:** |
|       |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there documentation that lists, by job title, the number of full-time-equivalent permanent jobs filled, and which of those jobs were made available to low-and moderate-income persons?[24 CFR 570.506(b)(5)(i)(B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Is there documentation showing how first consideration was given to low- and moderate-income persons for these jobs? [24 CFR 570.506(b)(5)(i)(B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. If the answer to “7.b” above is “yes,” does the documentation include:
	* what hiring process was used;
	* which low- and moderate-income persons were interviewed for a particular job; and
	* which low- and moderate-income persons were hired?

[24 CFR 570.506(b)(5)(i)(B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

8.

|  |
| --- |
| a. Of the total number of jobs filled, how many jobs were made available to low- and moderate-income persons? |
| 1. Were at least 51 percent of the jobs made available to low-and moderate-income persons?

**NOTE:** If the assisted activity is complete and did not meet the “held by” or “made available to” requirements in question “4.b.” and this question, respectively, the Reviewer must determine whether the completed activity can meet the national objective based on a combination of the “held by” and “made available to” requirements per question “9” below. If the answer to question “9” is “yes,” a finding **cannot** be made for this question.)[24 CFR 570.208(a)(4)(i)] |  |
| 1. Is there documentation showing, for each low- and moderate-income person hired, the size and annual income of the person’s family prior to the job being made available to the person **OR** is theredocumentation showing a presumed benefit was used, based on the census tract where the person resides or the business is located per 24 CFR 570.208(a)(4)(iv)(A) and/or (B)?

[24 CFR 570.506(b)(5)(ii)(C) or 24 CFR 570.506(b)(7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| d. Were the correct Section 8 income limits for family size and income used at the time the low- and moderate-income person applied and/or was hired for the job **OR** was the person presumed to be low and moderate income based on the census tract criteria set forth at 24 CFR 570.208(a)(4)(v), as applicable? [24 CFR 570.3 or 24 CFR 570.506(b)(1) and (7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

9.

|  |
| --- |
| Describe how the low- and moderate-income income status of an employee or applicant was determined or how the location of the employee or applicant or business was verified and documented. [24 CFR 570.3; 24 CFR 570.208(a)(4); 24 CFR 570.506(b)(5); or 24 CFR 570.506(b)(7)] |
| **Describe Basis for Conclusion:** |
|       |

E. Job Creation: Combining “Held By” and “Available To”

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the activity is completed (no more jobs are expected to be created) and the 51 percent threshold was not met for either jobs held by, or made available to, low- and moderate-income persons, can the threshold be met by combining the number of jobs held by and made available to low- and moderate-income persons (taking care not to double count the jobs) on a permanent FTE basis in order to meet the national objective? [24 CFR 570.208(a)(4) and 24 CFR 570.506(b)(5)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

F. Job RetentioN GENERAL (**NOTE**: If this option is not applicable, skip to Section I.)

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did the Monitored Entity qualify the assisted activity on the basis of job retention? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

12.

|  |
| --- |
| Provide the month and year that the CDBG assistance was first provided to this activity.  |
| **Describe Basis for Conclusion:** |
|       |

13.

|  |
| --- |
| a. What evidence does the business have to show that jobs would have been lost without the CDBG assistance?  |
| 1. Does this evidence clearly and objectively show that jobs would have been lost without CDBG assistance?

[24 CFR 570.208(a)(4)(ii) and 24 CFR 570.506(b)(6)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

14.

|  |
| --- |
| How many FTE permanent jobs were retained?      |
| **Describe Basis for Conclusion:** |
|       |

15.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is there documentation for each assisted business that lists the job title of the permanent jobs retained (including which jobs are part-time) and which jobs are held by low- and moderate-income persons (where it is known) at the time CDBG assistance was provided? [24 CFR 570.506(b)(6)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Is there documentation as to which of the retained jobs are projected to become available to low- and moderate-income persons through job turnover within two years of the CDBG assistance being provided?[24 CFR 570.506(b)(6)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. What is the basis for the job turnover projections?[24 CFR 570.506(b)(6)(ii)] |
| **Describe Basis for Conclusion:**      |
|  |

16.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Where jobs will be filled through job turnover, is there documentation that lists, by job title:
	* the permanent jobs;
	* which jobs, if any, were part-time;
	* which jobs required special skills or education; and
2. which of those jobs were made available to low-and moderate-income persons?

**NOTE:** If the business is not using job turnover to qualify the activity, skip to question 17.[24 CFR 570.506(b)(6)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |
| 1. Where jobs will be filled through job turnover, is there documentation of how first consideration was given to low- and moderate-income persons that includes:
	* what hiring process was used;
	* which low- and moderate-income persons were interviewed for a particular job; and
	* which low- and moderate-income persons were hired?

[24 CFR 570.506(b)(6)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|  |
| 1. Is there documentation, where jobs were filled through job turnover, that lists:
	* each job *turned* *over* as of the date of this monitoring;
	* how first consideration was given to low- and moderate-income persons; and
	* which of those jobs were either taken by, or made available to, low- and moderate-income persons?

[24 CFR 570.506(b)(6)(v)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

17.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Of the jobs retained per question 14, were at least 51 percent held by low- and moderate-income persons on a permanent FTE basis at the time the CDBG assistance was first provided? (Include percentage in “Basis for Conclusion” below.)[24 CFR 570.208(a)(4)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Is there documentation showing, for each low- and moderate-income job retained, the size and annual income of the person’s family at the time the job was proposed to be retained? [24 CFR 570.506(b)(6)(iii) or 24 CFR 570.506(b)(7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. If the answer to “17.b” above is “no” or “N/A,” is theredocumentation showing a presumed benefit was used, based on the census tract where the person resides or where the business is located?[24 CFR 570.208(a)(4)(iv)(A) and/or (B)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| d. Were the correct Section 8 income limits for family size and income used at the time the CDBG assistance was first provided **OR** is there documentation showing the person may be presumed to be low- and moderate-income based on the census tract criteria set forth at 24 CFR 570.208(a)(4)(v), as applicable? [24 CFR 570.3 or 24 CFR 570.506(b)(1) and (7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

g. JOB RETENTION: If Two or More Years Have Elapsed Since the Provision of CDBG Assistance for Retained Jobs

18.

|  |
| --- |
| a. How many retained jobs have turned over?       |
| b. Of the jobs listed in “a” above, were steps taken, per the written agreement, to ensure they were made available to low- and moderate-income persons on a permanent FTE basis during the two-year period? (Exclude those jobs held by low- and moderate-income persons when the CDBG assistance was first provided, as shown in question “17.a.” above.)[24 CFR 570.506(b)(6)(ii)] |
| c. Was the 51 percent requirement met for jobs retained or made available after the two-year period ended? [24 CFR 570.208(a)(4)(ii)(B) and 24 CFR 570.506(b)(6)(ii)]  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| 1. Is there documentation showing, for each low- and moderate-income person retained, the size and annual income of the person’s family prior to the person being hired for the job **OR** is theredocumentation showing a presumed benefit was used, based on the census tract where the person resides or the business is located per 24 CFR 570.208(a)(4)(iv)(A) and/or (B)?

[24 CFR 570.506(b)(6)(iii) or 24 CFR 570.506(b)(1) or (7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| f. Were the correct Section 8 income limits for the family applied at the time the low- and moderate-income person was retained **OR** was the person presumed to be low- and moderate-income based on the census tract criteria set forth at 24 CFR 570.208(a)(4)(v), as applicable?[24 CFR 570.3 or 24 CFR 570.506(b)(7)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

h. JOB RETENTION: If Less than Two Years Have Elapsed Since the Provision of CDBG Assistance for Retained Jobs

19.

|  |
| --- |
| a. How many of the retained jobs (excluding those known to be held by low- and moderate-income persons at the time CDBG assistance was first provided, as shown in question “17.a.”) are projected to become available to low- and moderate-income persons through job turnover within two years of the time the CDBG assistance was provided? [24 CFR 570.506(b)(6)(ii)] |
| b. Does the projected amount appear to be reasonable? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

I. Report Validation

20.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your review of the records validate the information and number of jobs provided by the Monitored Entity in the most recently completed (or applicable) Quarterly Reports? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

## Checklist C5: Guide for Review of National Objective of Area Slums or Blight

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are classified by the Monitored Entity as meeting the national objective of area slums or blight. One Checklist is to be completed for each activity reviewed. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions**

1.

|  |
| --- |
| a. When was the area designated as a slum, blighted, deteriorated or deteriorating area?[24 CFR 570.208(b)(1)(i) and 24 CFR 570.506(b)(8)(ii)] |
| b. Does the Monitored Entity’s file documentation identify the state or local law that contains the definition of a slum, blighted, deteriorated or deteriorating area used to qualify the area?[24 CFR 570.208(b)(1)(i) and §570.506(b)(8)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the Monitored Entity’s files clearly describe the geographical boundaries of the designated area for the activity? [24 CFR 570.208(b)(1)(iii) and 24 CFR 570.506(b)(8)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Was the area qualified on the basis of deteriorated or deteriorating buildings? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes” to “3.a,” is there documentation showing that the area, at time of designation, had a substantial number of deteriorating or deteriorated buildings? [24 CFR 570.208(b)(1)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. If the percentage of deteriorated or deteriorating buildings in the area was less than the proportion specified in the State law or 25 percent, how did the Entity qualify the area on this basis? |
| **Describe Basis for Conclusion:**      |
|  |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Was the area qualified on the basis of the condition of the public improvements (e.g., streets, sidewalks) in the area? |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes” to “4.a” above, is there documentation to show that the public improvements throughout the area were in a general state of deterioration?[24 CFR 570.208(b)(1)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the documentation show that the conditions in the area satisfy(ied) the state or local law requirements for a slum or blighted area at time of designation?[24 CFR 570.208(b)(1)(i) and 24 CFR 570.506(b)(8)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Is there evidence to support that the area is, or was, slum/blighted at the time of designation based on an inspection of the area and Monitored Entity files? [24 CFR 570.208(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

7.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Has the Monitored Entity funded, or does it intend to fund, residential buildings rehabilitated under the slum and blight area national objective? (If “no,” skip to question 9.) |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If the answer to 7.a. is “yes,” does the Monitored Entity have a local definition of “substandard” housing conditions?[24 CFR 570.208(b)(1)(iv) and 24 CFR 570.506(b)(9)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| c. If the answer to 7.b. above is “yes,” *at a minimum*, does a property meeting the local definition of substandard also fail to meet the housing quality standards for the Section 8 Housing Assistance Payment Program at 24 CFR 882.109?[24 CFR 570.208(b)(1)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

8.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the answer to “7.a.” above is “yes,” does a review of a sample of files show documentation, by structure, that includes:1. how the building met the local definition of “substandard?”

ii. a pre-rehabilitation inspection report describing all deficiencies in the structure to be rehabilitated? iii. details and scope of the CDBG-assisted rehabilitation?iv. information to show that the deficiencies making the unit substandard were eliminated prior to less critical work on the structure?[24 CFR 570.208(b)(1)(iv) and 24 CFR 570.506(b)(9)(i), (ii) and (iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |

9.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information contained in the most recently completed Quarterly Report for the activity?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

10.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the activity/do the activities assisted under this national objective address one or more of the conditions which contributed to the deterioration of the area? [24 CFR 570.208(b)(1)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

11.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If ten (10) years or more has passed since time of designation by the Monitored Entity, did the Monitored Entity requalify the area and provide documentation to substantiate how the area continues to meet the slums or blighted criteria?[24 CFR 570.208(b)(1)(iii) and 24 CFR 570.506(b)(8)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Has the Monitored Entity redetermined the slum or blight designation for the area every 10 years for continued qualification?[24 CFR 570.208(b)(1)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

## Checklist C6: Guide for Review of National Objective of Spot Slums or Blight

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist to monitor activities that are classified by the Monitored Entity as meeting the national objective of addressing slums or blight on a spot basis. One Checklist is to be used for each activity reviewed. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

1.

|  |
| --- |
| a. What activity did the Monitored Entity carry out under this national objective?  |
| b. Does this activity fall into one or more of the five eligible categories under the spot slums or blight national objective: acquisition, clearance, relocation, historic preservation, and/or building rehabilitation activities?[24 CFR 570.208(b)(2)] |  |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the file documentation describe the specific condition of blight or physical decay that the activity eliminates? [24 CFR 570.208(b)(2) and 24 CFR 570.506(b)(10)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If the activity involved rehabilitation of a building, other than an historic property, was the CDBG-assisted work limited to conditions detrimental to public health and safety? [24 CFR 570.208(b)(2) and 24 CFR 570.506(b)(10)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes” to “3.a” above, does the file documentation identify the specific conditions detrimental to public health and safety and the details and scope of the CDBG-assisted rehabilitation by structure?[24 CFR 570.506(b)(10)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If you inspected the activity on-site, does it appear to meet the restriction for eliminating specific conditions of blight or physical decay on a spot basis not located in a slum or blighted area? [24 CFR 570.208(b)(2) and 24 CFR 570.506(b)(10)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information contained in the the most recently completed Quarterly Report for the activity?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

## Checklist C7: Guide for Review of National Objective of Slums or Blight for an Activity In An Urban Renewal Plan

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are classified as meeting the national objective of addressing slums or blight in an urban renewal area. One Checklist is to be completed for each activity reviewed. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Is this activity located within the HUD-approved boundaries of an urban renewal project area or Neighborhood Development Program (NDP) action area (i.e., an area in which funded activities were authorized under an urban renewal Loan and Grant Agreement or an annual NDP Funding Agreement, pursuant to Title I of the Housing Act of 1949)?  [24 CFR 570.208(b)(3) and24 CFR 570.506(b)(11)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes” to “a” above, what is the name and number of the HUD-approved urban renewal project? |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Do the records show how this activity was necessary to complete the urban renewal plan, as then in effect, including initial land redevelopment permitted by the plan?  [24 CFR 570.208(b)(3)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Does the file documentation contain a copy of the Urban Renewal Plan, as in effect at the time the activity is carried out, including maps and supporting documentation? [24 CFR 570.506(b)(11)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| From your review of the records, is it clear that this site has not been previously developed in accordance with the Urban Renewal plan? [24 CFR 570.208(b)(3)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information contained in the most recently completed Quarterly Report for the activity? [24 CFR 91.525(a)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. If you conducted an on-site inspection of the urban renewal/NDP area, is it evident that the activity’s location is within the HUD-approved boundaries? [24 CFR 570.208(b)(3)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If you conducted an on-site inspection of the urban renewal/NDP area, is there any evidence to indicate that this site has been previously developed in accordance with the Urban Renewal plan?[24 CFR 570.208(b)(3)(i)] |  |
| **Describe Basis for Conclusion:** |
|       |

## Checklist C8: Guide for Review of National Objective for Urgent Needs

|  |  |
| --- | --- |
| Name of Monitored Entity: |  |
| Project ID:  |  |
| Name of Project: |  |
| Name of Reviewer: |  |
| Date Completed: |  |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, the Reviewer must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the Reviewer in understanding the Monitored Entity’s program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

**Instructions:** Use this Checklist for activities that are designed to meet community development needs having a particular urgency. One Checklist is to be completed for each activity reviewed. **Prior to completing the checklist, confirm if any waivers have been granted with regard to National Objective. Adjust the checklist accordingly.**

**Questions:**

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Has the Monitored Entity documented a condition of “particular urgency” that poses “a serious and immediate threat to the health or welfare of the community?” [24 CFR 570.208(c) and 24 CFR 570.506(b)(12)(i)]  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. Describe the condition. |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. Did this condition become critical within the 18 months preceding the Monitored Entity’s certification?[24 CFR 570.208(c) and24 CFR 570.506(b)(12)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| b. If “yes”, indicate month and year.  |
| c. If the answer to “2.a” above is later than 18 months preceding the CDBG assistance, how did the Monitored Entity justify that this condition was of recent origin? |
| **Describe Basis for Conclusion:** |
|       |

3.

|  |
| --- |
| a. What activity was (activities were) assisted with CDBG funds? |
| b. What evidence does the Monitored Entity have to show that it certified that the activity was (activities were) designed to address the urgent need?[24 CFR 570.506(b)(12)(ii)] |
| c. Was the CDBG funding limited to the activity or activities necessary to alleviate the threat?  [24 CFR 570.208(c)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Has the Monitored Entity clearly documented that other sources of funding were not available to cover all the activity costs (e.g., does it have letters denying assistance from agencies that provide the type of assistance needed)?[24 CFR 570.208(c) and24 CFR 570.506(b)(12)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Did your inspection of the records validate the information contained in the most recently completed Quarterly Report for the activity? [24 CFR 91.525(a)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If you inspected the activity, is there any evidence that would indicate that the CDBG-assisted activity/activities alleviated a threat to the community’s health or welfare? [24 CFR 570.208(c)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |

|  |  |  |
| --- | --- | --- |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |