New requirements are in red text and do not apply for the 2022 PR&C review. These requirements will be applicable in 2023. Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2022 PR&C review.

Bold are requirements that now apply for the 2022 PR&C review.

Standard D1	Guideline D1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency maintains a financial management system that is accurate, clear, and current. The agency's financial management system can identify each grant's revenue and expenses separately. For federal	Staff can demonstrate the accounting software's ability to track revenues and expenses by grant and project. If the accounting software does not track revenue and expenses by grant and project, staff can demonstrate how they identify revenue and expenses for each grant and project.	☐ File Review: CSB reviewed the Internal Control Questionnaire. ☐ Discussion: Agency explained its financial management system, including software and allocation method(s), and processing of	 □ Compliant □ Compliant with conditions □ Non-compliant □ N/A 		1	All programs
grants, the system must include the title and Assistance Listing (formerly CFDA) number. Financial staff is qualified to maintain a high-quality financial management system in compliance with federal and other funding requirements.	 Staff can demonstrate that each federal grant can be identified by title and Assistance Listing number. Staff can demonstrate a combination of education and experience consummate with the scope of their responsibilities. 	accurate, current, and complete transactions. Discussion: Agency explained how each grant and project's revenue and expenses are recorded in the accounting system. Discussion: Agency explained how federal				
There is an adequate separation of duties.	 Staff can demonstrate that there is adequate separation of duties to reduce the opportunity for someone to perpetrate or conceal errors, 	grant titles and Assistance Listing numbers are maintained.				

	misappropriate funds, or other irregularities.	<u>Discussion</u> : Agency demonstrated qualifications for high-level finance staff.		
		<u>Discussion</u> : Agency explained its system of internal controls, including segregation of duties.		
		Policy Review: Internal controls are documented in the financial policies.		
Discussion and Basis for C	onclusion			

Standard D2	Guideline D2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Grant expenses and match are consistently charged to appropriate funding sources.	 The agency has a procedure that ensures costs and match are charged to the appropriate funding sources. 	Discussion or Policy Review: The agency can describe or provide in writing the procedure	□ Compliant□ Compliantwith	OTTION.	1	All programs
Payments are processed within a reasonable period, including accrued expenses.	☐ The agency uses HMIS to ensure the same client is not served in a similar program during the same timeframe.	for ensuring costs and match are charged to the appropriate funding sources and are not duplicated.	conditions Non- compliant			
Expenses are adequately documented.	J	☐ <u>Discussion or Policy</u> <u>Review</u> : The agency can	□ N/A			

Agency:

The agency has a		Charges to grants are paid		describe or provide in			
procedure for ensuring		within a reasonable period		writing the procedure			
there is no duplication of		and checks cleared the bank.		for ensuring the same			
client services.				client is not served in a			
		Charges to grants are		similar program during			
Funds received are		adequately documented with		the same timeframe.			
appropriately restricted		invoices, bills, expense					
and/or allocated to		reports, leases, contracts, etc.		File Review: CSB			
specific programs.		Charges to grants have		conducted a Full Payroll			
		verification of all expenses		Review of payroll			
Expenditures are		listed on the invoice,		records for up to 3			
reviewed and approved		regardless of whether CSB		employees for a pay			
in compliance with		requires submission of		period not to exceed			
Generally Accepted		documentation.		10% of employees for			
Accounting Principles		dodinontation.		the pay period (HUD			
and/or funding		Staff can describe how cash		CoC- and ESG-funded			
requirements.		receipts are posted and can		programs only)			
•		establish an audit trail for CSB		p. 18 , ,			
The agency received		payments.		File Review: CSB tested			
prior written approval for		payments.		at least 10% of			
equipment purchases		The agency can state name(s)		transactions on each			
with an acquisition cost		The agency can state name(s)		monthly invoice to verify			
of \$5,000 or more.		and title(s) of the employee(s)		allowability, accuracy,			
. , , , , , , , , , , , , , , , , , , ,		responsible for ensuring that		completeness, and			
Federal cash is only		expenditures and payments		timeliness (HUD CoC-			
drawn on an "as		are compliant with the		and ESG-funded			
needed" basis and must		contract.		programs only).			
not be held more than 3		There is avidence the		Payments to vendors			
working days.		There is evidence the		were made within a			
		payment review and approval		reasonable period.			
The agency periodically		process is being		reasonable period.			
reviews vendors to		implemented.		File Review: CSB			
ensure they are not	_						
debarred or suspended		Grant expenditures do not		reviewed the grant			
from participation		include unallowable costs,		expenses to verify			
o paraorpadori	1	cuch ac antartainment	I	unallowable costs were	1	1	

Agency:

				1		
related to federal		contributions, donations,	not charged to the			
awards.		fines, penalties, general	grants.			
		governmental expenditures,				
		lobbying, political activities,	Discussion: Staff			
		and sales tax.	explained the accounts			
			payable process and			
		Equipment purchases	submitted invoices with			
		received prior written approval	adequate			
		to purchase.	documentation.			
		Federal cash on hand is not	File review: CSB			
		held for longer than 3 working	reviewed equipment			
		days.	purchases over \$5,000			
		•	during invoice review to			
		The agency does not do	ensure prior written			
		business with vendors that	approval was obtained.			
		have been debarred or				
		suspended from doing	Discussion: Staff			
		business with the federal	explained how federal			
		government.	grant revenue is			
		8	reviewed to ensure			
			there is not an excess			
			of cash on hand.			
			Discussion: Staff			
			explained how the			
			Agency ensures they do			
			not do business with			
			vendors excluded from			
			doing business with the			
			federal government.			
Discussion and Basis for (Conc	clusion		1	1	

Agency:

Standard D3	Guideline D3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency charges indirect costs, it has an indirect cost allocation plan that details the allocation methodology and what expenses are included.	□ The agency uses one of the following to charge indirect costs to the grant: (1) Federally-approved indirect cost rate (ICR) agreement. A copy of the signed agreement is submitted to CSB as soon as it is approved. (2) 10% de minimis indirect cost rate (3) Indirect cost plan approved by the City of Columbus. A copy of the indirect cost plan is submitted to CSB as soon as it is approved. (4) If the Agency uses a different method, a written plan for allocating administrative costs is submitted to CSB for approval. □ Agencies cannot charge indirect costs on contracted costs. A contract is a formal legal document for the purpose of obtaining goods and services for the agency's own use and creates a procurement relationship with the contractor. Contractor costs are determined by the presence of a formal legal contract.	Policy Review: CSB reviewed the indirect cost allocation plan, if applicable. File Review: During monthly invoice review, CSB tested that indirect costs were applied consistently to all grants/projects. File review: During monthly invoice review, CSB ensured: (1) that the federal ICR calculations and basis was correct. (2) that the 10% de minimis ICR calculations were correct, ensuring that the Agency used only a modified total direct costs basis. (3) that the City of Columbus indirect cost rate calculations were correct. (4) that the cost allocation plan calculations were correct.	 □ Compliant with conditions □ Non-compliant □ N/A 		1	All programs

	☐ If an ICR is used for any invoices, it must be applied consistently to all grants/projects from all funders. The only exception is for programs that are paid via performance-based reimbursements.			
Discussion and Basis for	Conclusion			

Standard D4	Guideline D4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
There is separate accountability of staff time between administrative and programmatic activities.	 □ The agency has a procedure for tracking, charging, and accounting for program and non-program staff time and costs. □ The agency uses personnel activity reports and/or time sheets to track staff time by day, number of hours for each program/project, and type of activity. Personnel activity reports and/or time sheets are allocated on an hourly basis, reported by pay period, and approved by employees 	File Review: CSB reviewed the Internal Control Questionnaire and timesheets.	 □ Compliant □ Compliant with conditions □ Non-compliant □ N/A 		1	All programs
	activity reports and/or time sheets to track staff time by day, number of hours for each program/project, and type of activity. Personnel activity reports and/or time sheets are allocated on an hourly basis, reported by pay period,		compliant			

Agency:	
Date of	Review

	supervisor. Signatures can be physical or electronic.							
	Salaries, wages, and fringe benefits cannot be allocated to grants/projects based on estimates or historical data. The basis of allocation can be full-time equivalent (FTE) employees or households served for staff whose time is difficult to split between programs.							
Discussion and Basis for O	Discussion and Basis for Conclusion							

Standard D5	Guideline D5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency met budget and funding requirements for match.	☐ The agency must match all grant funds, except Leasing funds, with at least 25 percent in cash or in-kind contributions. Match funding can only be used one time.	Other: CSB tracked match via monthly invoices to ensure the minimum percentages were met.	☐ Compliant☐ Compliant with conditions		1	HUD-funded CoC/YHDP programs
	□ Cash and in-kind match must only be used for the eligible activities outlined in 24 CFR 578. Any activity that is allowable under 24 CFR 578 is also allowable under match.	File Review: CSB reviewed cash and inkind match source documentation, eligibility of use, and allowability of costs.	□ Non-compliant□ N/A			

		Cash match can come from	Other: CSB tested			I
		any source, including non-CoC	disbursements to verify			I
		federal, State, local, private	allowability, accuracy,			1
		sources, and Program Income,	completeness, and			1
		as long as the funds are not	timeliness, via monthly			1
		statutorily prohibited to be	UFA monitoring of			1
		used as match.	invoices.			1
						1
		In-kind match includes the	Discussion: The Agency			1
		value of any property,	explained how they			
		equipment, goods, or services	determined the value			1
		contributed to the project as	of in-kind match to			
		match. Services provided by a	ensure they did not			
		third party must be	exceed fair market			1
		documented by a	value.			1
		Memorandum of				1
		Understanding. The agency				1
		documents the value of the in-				1
		kind match received.				I
Discussion and Basis for 0	Conc			J	I	

Standard D6	Guideline D6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The Agency ensures and documents outreach activities to minority and women's businesses and vendors in labor	Agency procurement policies include recordkeeping requirements for outreach activities to minority and women-owned businesses and vendors in labor surplus areas.	Policy Review: CSB reviewed documentation of procurement efforts and associated recordkeeping.	☐ Compliant ☐ Compliant with conditions		1	All programs
surplus areas when			☐ Non- compliant			

Agency:

nama a comina di a anno a constitui di		0		D:			
procuring services and		Staff can describe how the	Ш	<u>Discussion</u> : Agency			
goods.		program maintains:		described	N/A		
		(a) data on the racial, ethnic,		procurement			
		and gender characteristics of		activities.			
		each business entity with a					
		contract or subcontract of					
		\$25,000 or more paid with					
		program funds;					
		(b) data on the amount of the					
		contract or subcontract;					
		(c) Documentation of affirmative					
		steps taken to assure that					
		minority and women businesses					
		and vendors in labor surplus					
		areas have an equal opportunity					
		to compete for contracts and					
		subcontracts as sources of					
		supplies, equipment,					
		construction, and services. [24					
		CFR 85.36(e) or 24 CFR					
		84.44(b)(1)]					
Discussion and Basis for	Cor					I	
Discussion and basis for	COI	iciasion					

Standard D7	Guideline D7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency watering			- .	Official"		
The agency retains	☐ The agency has a procedure	☐ <u>File Review</u> : CSB	Compliant			
program income and	that ensures that program	reviewed the Internal			1	HUD-funded
adds it to the funds	income requirements are met.	Control Questionnaire	□ Compliant			CoC/YHDP
committed to the		and documentation of	with			programs
project.	☐ Program income is the income	program income as	conditions			
	received by the agency, usually					

Agency:

Program income for the		in the form of tenant rent. The	part of monthly invoice	Non-		
grant is expended prior		agency adds the program	review and monitoring.	compliant		
to the disbursement of		income to the funds committed		•		
grant funds.		to the project.	<u>Discussion</u> : The agency	N/A		
			explained its program			
		Agencies must report how	income recording			
		program income was spent on	process.			
		monthly CoC invoices. Program				
		income must be used for CoC-	Discussion: The agency			
		eligible activities.	explained how program			
			income was expended			
		Program income can be used	before grant funds.			
		as Match.				
Discussion and Basis for	Cor	nclusion				

Standard D8	Guideline D8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The governing board will procure an independent certified public accountant to audit the financial statements consistent with the following: (1) The audit is performed in accordance with generally accepted government auditing standards;	 □ The agency submits a copy of the most recent audit report and management letter annually within 30 days following the governing board's acceptance. □ Board minutes reflect the board's review and acceptance of the audit report and management letter. Board minutes reflect review of IRS 990. 	☐ File Review: A copy of the agency's audit report, management letter, and IRS 990 were submitted to CSB by the required due dates. ☐ File review: Delays in submission of these documents were communicated to CSB.	 □ Compliant □ Compliant with conditions □ Non-compliant □ N/A 		1	All programs

Agency:

Standard D9	Guideline D9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
For federally-funded programs, the agency identifies, through a physical inventory, equipment purchased with federal funds at least every 2 years. All tangible property and assets are identified in accordance with 2 CFR Part 200.	In accordance with 2 CFR Part 200, for equipment purchases with federal funds: (1) Equipment records will be maintained accurately. (2) Equipment owned by the Federal Government will be identified to indicate Federal ownership. (3) A physical inventory of equipment will be taken and	Policy Review: CSB reviewed policies on physical inventories and reconciliations for federally purchased and non-federally purchased equipment with an acquisition cost of \$5,000 or more.	 Compliant Compliant with conditions Non-compliant N/A 		2	All programs
For non-federally funded programs, the agency identifies, through a physical inventory, equipment purchased with CSB funding with an acquisition cost of \$5,000 or more at least every 2 years. Formerly Standard D8.	the results reconciled with the equipment records at least once every 2 years. Any differences between quantities determined by the physical inspection and those shown in the accounting records will be investigated to determine the causes of the difference. (4) The agency will, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.	☐ File review: CSB reviewed documentation to ensure a physical inventory of equipment had occurred within the past 2 years. ☐ Other: CSB reviewed the inventory records and examples of identified equipment.				
Discussion and Basis for C				1	I	

Standard D10	Guideline D10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a finance/accounting policies and procedures manual. The agency has written procurement policies. Formerly Standard D9.	□ The agency has a written, upto-date policy and procedure manual for finance and accounting. □ The agency's procurement policies adhere to the following: (1) Standards covering conflicts of interest in the selection, award and administration of contracts or vendor selections; (2) No real or apparent conflicts of interest for employees, officers or agents; (3) Avoid unnecessary or duplicative purchases; (4) Promote use of shared services for common or shared goods and services; (5) Allow for full and open competition, including prohibiting geographic preferences; (5) Ensure prequalified lists of vendors are current; □ (6) Methods of procurement are described and limits of each are noted (micro	Policy Review: CSB reviewed the Internal Control Questionnaire, financial/accounting policies and procedures manual, and procurement policies. Discussion: Staff discussed recent updates.	□ Compliant with conditions □ Non-compliant □ N/A		2	All programs
	purchase, small purchase, sealed bids, competitive proposals);					

			,						
	 (7) Maintain documentation of procurements. 								
Discussion and Basis for Conclusion									
Standard D11	Guideline D11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type			
Letterhead, website, or other publicity materials about programs that receive funding from CSB recognize funding sources. Any information given to the public regarding the program prominently identifies CSB and its funders as the funding sources, as outlined in the CSB Requirements for Public Materials for partner agencies. Formerly Standard D10	 Letterhead, website, or other publicity materials related to the program have the appropriate recognition of funding (funder logos or a written statement). HUD does not require recognition of funding in publicity materials. 	Other: CSB reviewed letterhead, website, and/or applicable materials about CSB-funded programs and CSB funders for logos or written statements.	 □ Compliant with conditions □ Non-compliant □ N/A 		2	All programs			
Discussion and Basis for 0	Conclusion								

Agency:

Standard D12	Guideline D12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency's chart of accounts includes a complete listing of the account numbers used. Formerly Standard D11	 The agency can provide a chart of accounts for each grant/ program. 	File Review: CSB reviewed the chart(s) of accounts.	☐ Compliant☐ Compliant with conditions		2	All programs
			□ Non-compliant□ N/A			

Standard D13	Guideline D13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has the following insurance	 All labor related documents must be posted in areas 	 Other: CSB confirmed posting of wage/hour 	□ Compliant		2	All programs
provisions, notices, and	where all employees can see	notice.	☐ Compliant			All programs
certificates and upon	them and have access to		with			
request will furnish certificates evidencing the	them.	 Other: CSB reviewed various insurances to 	conditions			
existence of the following: (1) Worker's	 All insurances have current policies in force. 	ensure they were current and in force.	□ Non- compliant			
Compensation Certificate;	policies in force.	current and in force.	Compliant			
(2) Employment			□ N/A			
Practices Liability (EPL);			,			
(3) Employer's Liability;						
(4) Comprehensive						
General Liability (CGL);						
(5) Directors' and						
Officers' Liability (D&O);						

Agency:

(6) Fidelity and Crime Insurance; (7) Umbrella Insurance over all primary coverage; (8) Property Insurance; (9) Wage and Hour Notice. Formerly Standard D12						
Discussion and Basis for Co	nciusion					
0: 1 1544				0 116 1		
Standard D14	Guideline D14	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Managers review financial reports, budgeted and actual costs, and supporting documentation in a timely manner. Budgets are modified as needed following CSB guidance. Formerly Tier 3, Standard D13	 There is evidence that managers review financial reports, budget to actual comparisons, and documentation. The agency modifies it's grant budgets as needed. 	□ Discussion or Policy Review: The agency described or provided in writing procedures for management review. □ File Review: CSB reviewed when budgets were modified throughout the fiscal year.	 □ Compliant □ Compliant with conditions □ Non-compliant □ N/A 		2	All programs
Discussion and Basis for Co	nclusion		,		•	

Agency:

Standard D15	Guideline D15	Monitoring Method	Cor	nclusion	Certifying Official*	Tier	Program Type
The agency does not do business with the enemy,	The agency ensures it does not do business with the enemy or	Self-certification	□ Со	ompliant		3	All programs
as defined in 2 CFR 200.215.	purchase goods or services from telecommunications and video surveillance vendors that are		wit	ompliant th onditions			
The agency does not contract with or procure services from telecommunications and	prohibited.		□ No				
video surveillance vendors listed in 2 CFR 200.216.			□ N/	/A			

CSB reviews Tier 1 standards annually and 2 standards every 4 years. For years when CSB does not review Tier 2 standards, agency staff certifies compliance with both Tier 2 and Tier 3 standards in the 'Certifying Official' column.