



## Community Shelter Board (CSB)

### Common UFA Monitoring Findings

Aligned with HUD Requirements and CSB Monitoring Framework  
Final 05/01/2026

#### 1. Period of Performance (Allowable Costs)

Costs must be incurred and paid within the applicable grant period (2 CFR §200.403). Pre-award and post-award costs are not allowable unless explicitly authorized. Agencies must ensure expenses are recorded in the correct period and properly allocated across funding years.

#### 2. Indirect Cost Rates

Agencies using an approved indirect or de minimis rate must apply it consistently across all applicable federal awards (2 CFR §200.414). Documentation supporting the calculation and application of the rate must be maintained and available for review.

#### 3. Timely Response to Monitoring Requests

Agencies are expected to respond to monitoring requests within 7 calendar days. Delays must be communicated promptly to CSB. Timely responses are critical to maintaining compliance with HUD monitoring expectations.

#### 4. Unallowable Costs

Unallowable costs include sales tax, gift cards, and certain miscellaneous items not permitted under HUD regulations. Agencies must ensure all costs charged to grants are eligible under 24 CFR Part 576 or 578 and properly documented.

#### 5. Payroll Documentation

Payroll charges must be supported by timesheets, payroll registers, and paystubs. Timesheets must reflect actual hours worked by activity and be approved. Allocation by percentages is not permitted; allocation must be based on actual time or an approved cost allocation methodology.

#### 6. Expense Allocation

Expenses must be charged to the correct program and budget line item. Costs must be allocated fairly and not duplicated across funding sources. Documentation must clearly support the allocation method used.

#### 7. Rent Reasonableness and Housing Costs

Rent must meet HUD rent reasonableness standards (24 CFR §578.51). Documentation must include FMR comparisons, utility allowances, and inspection records. Inconsistent or incomplete documentation may result in repayment.

#### **8. Unit Turnover Costs**

Unit repair costs charged to rental assistance cannot exceed one month's rent and may only be charged once per unit turnover, per HUD guidance (24 CFR §578.51).

#### **9. Missing or Incomplete Documentation**

Incomplete documentation is a frequent monitoring finding. Agencies must provide full supporting documentation including invoices, proof of payment, leases, inspections, payroll records, and disbursement journals.

#### **10. Internal Controls and Approval Processes**

Agencies must demonstrate strong internal controls, including segregation of duties, documented approval processes, and consistent financial practices. Evidence of approval must be included in supporting documentation.

#### **11. Best Practices to Avoid Findings**

Agencies should implement internal quality control processes, review invoices before submission, maintain organized documentation, and ensure consistency across all records including HMIS, financial systems, and supporting documentation.