

2025 Program Review and Certification Standards

D. Fiscal Administration

New requirements are in red text and do not apply for the 2025 PR&C review. These requirements will be applicable in 2026.

Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2025 PR&C review.

Bold are requirements that now apply for the 2025 PR&C review.

Standard D1	Guideline D1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency maintains a financial management system that is accurate, clear, and current.</p> <p>The agency's financial management system can identify each grant's revenue and expenses separately. For federal grants, the system must include the title and Assistance Listing (formerly CFDA) number.</p> <p>Financial staff is qualified to maintain a high-quality financial management system in compliance with federal and other funding requirements.</p> <p>There is an adequate separation of duties.</p>	<p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> Staff can demonstrate that each federal grant can be identified by title and Assistance Listing number.</p> <p><input type="checkbox"/> Staff can demonstrate a combination of education and experience consummate with the scope of their responsibilities.</p> <p><input type="checkbox"/> Staff can demonstrate that there is adequate separation of duties to reduce the opportunity for someone to perpetrate or conceal errors, misappropriate funds, or other irregularities.</p>	<p><input type="checkbox"/> <u>Other/Discussion</u>: CSB reviewed the Internal Control Questionnaire and discussed items in question.</p> <p><input type="checkbox"/> <u>Policy Review</u>: Internal controls are documented in the financial policies.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	All programs
Discussion and Basis for Conclusion						

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Standard D2	Guideline D2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Grant expenses and match are consistently charged to appropriate funding sources.</p> <p>Payments are processed within a reasonable period, including accrued expenses. Expenses are adequately documented.</p> <p>Invoices for each program are submitted within 30 days of a month's end with certifier approval of accuracy.</p> <p>Costs are invoiced on a reimbursement basis unless an advance payment agreement, a Schedule A payment agreement, or a performance-based agreement is in place.</p> <p>The agency has a procedure for ensuring there is no duplication of client services.</p> <p>Funds received are appropriately restricted</p>	<p><input type="checkbox"/> The agency has a procedure that ensures costs and match are charged to the appropriate funding sources and invoiced monthly.</p> <p><input type="checkbox"/> The agency has a procedure, and staff is trained, to ensure that costs are invoiced only after they are paid.</p> <p><input type="checkbox"/> The agency uses HMIS to ensure the same client is not served in a similar program during the same timeframe.</p> <p><input type="checkbox"/> Charges to grants are paid within a reasonable period (within 30 days of an accurate invoice submission) and checks cleared the bank.</p> <p><input type="checkbox"/> Charges to grants are adequately documented with invoices, bills, expense reports, leases, contracts, etc. Charges to grants have verification of all expenses listed on the invoice, regardless of whether CSB requires submission of documentation.</p> <p><input type="checkbox"/> The agency has a process to ensure that all programs are</p>	<p><input type="checkbox"/> <u>Discussion or Policy Review</u>: The agency can describe or provide in writing the procedure for ensuring costs and match are charged to the appropriate funding sources and are not duplicated (ICQ).</p> <p><input type="checkbox"/> <u>Discussion or Policy Review</u>: The agency can describe or provide in writing the procedure for ensuring the same client is not served in a similar program during the same timeframe (ICQ).</p> <p><input type="checkbox"/> <u>File Review</u>: CSB tested payroll records for up to three employees for a pay period not to exceed 10% of employees for the pay period (HUD CoC, ARPA, and ESG funded programs only). For non-CoC or non-ESG programs, this is done during the PR&C visit (if the agency doesn't have CoC or ESG funding that is</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	All programs

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<p>and/or allocated to specific programs.</p> <p>Expenditures are reviewed and approved in compliance with Generally Accepted Accounting Principles and/or funding requirements.</p> <p>The agency received prior written approval for equipment purchases with an acquisition cost of \$5,000 or more.</p> <p>Federal cash is only drawn on an “as needed” basis and is not held more than 3 working days.</p> <p>The agency periodically reviews vendors to ensure they are not debarred or suspended from participation related to federal awards.</p> <p>Additional invoice documentation requested by the funder is provided in a timely manner.</p>	<p>invoiced monthly or notify CSB that a program has no costs for a month.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Staff can describe how cash receipts are posted and can establish an audit trail for CSB payments. <input type="checkbox"/> The agency can state name(s) and title(s) of the employee(s) responsible for ensuring that expenditures and payments are compliant with the contract. <input type="checkbox"/> There is evidence the payment review and approval process is being implemented. <input type="checkbox"/> Grant expenditures do not include unallowable costs, such as entertainment, contributions, donations, fines, penalties, general governmental expenditures, lobbying, political activities, and sales tax. <input type="checkbox"/> Equipment purchases received prior written approval to purchase either through the Gateway budgeting process or through electronic requests. 	<p>monitored throughout the year).</p> <ul style="list-style-type: none"> <input type="checkbox"/> <u>File Review</u>: CSB tested at least 10% of non-staff transactions on each monthly invoice to verify allowability, accuracy, completeness, and timeliness (ARPA, HUD CoC-and ESG-funded programs only). Payments to vendors were made within a reasonable period. For non-CoC or non-ESG programs, this is done during the PR&C visit.) <input type="checkbox"/> <u>File Review</u>: CSB reviewed the grant expenses to verify unallowable costs were not charged to the grants during invoice review. <input type="checkbox"/> <u>File review</u>: CSB reviewed equipment purchases over \$5,000 during invoice review to ensure agency followed their own procedures prior to purchase. 				
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	<input type="checkbox"/> Federal cash on hand is not held for longer than 3 working days. <input type="checkbox"/> The agency does not do business with vendors that have been debarred or suspended from doing business with the federal government. <input type="checkbox"/> Additional documentation for invoices is provided typically within 7 days and no more than 30 days.	<input type="checkbox"/> <u>Discussion:</u> Staff explained how federal grant revenue is reviewed to ensure there is not an excess of cash on hand (ICQ). <input type="checkbox"/> <u>Discussion:</u> Staff explained how the Agency ensures they do not do business with vendors excluded from doing business with the federal government (ICQ).				
Discussion and Basis for Conclusion						

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.	<input type="checkbox"/> 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% <i>de minimis</i> indirect cost rate (3) If the Agency uses a different method, a written plan for allocating administrative costs is submitted to CSB for approval.	<input type="checkbox"/> <u>Policy Review:</u> CSB reviewed the indirect cost allocation plan, if applicable. <input type="checkbox"/> <u>File Review:</u> During monthly invoice review, CSB tested that indirect costs were applied consistently to all grants/projects. <input type="checkbox"/> <u>File review:</u> During monthly invoice review, CSB ensured:	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

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	<p>(4) 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.</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> If a federally approved ICR agreement is in place, the agency reconciled their final indirect cost rate with the provisional rate for any open grant. The agency adjusted their charged indirect costs to the grants based upon the final indirect cost rate.</p>	<p>(1) that the federal ICR calculations and basis was correct.</p> <p>(2) that the 10% <i>de minimis</i> ICR calculations were correct, ensuring that the Agency used only a modified total direct costs basis.</p> <p>(3) that the City of Columbus indirect cost rate calculations were correct.</p> <p>(4) that the cost allocation plan calculations were correct.</p>				
Discussion and Basis for Conclusion						

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Standard D4	Guideline D4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
There is separate accountability of staff time between administrative and programmatic activities.	<input type="checkbox"/> The agency has a procedure for tracking, charging, and accounting for program and non-program staff time and costs. <input type="checkbox"/> 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 and each employee's supervisor. Signatures can be physical or electronic. <input type="checkbox"/> 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.	<input type="checkbox"/> <u>File Review</u> : CSB reviewed the Internal Control Questionnaire and timesheets (via monthly monitoring of invoices for ARPA , CoC and ESG programs and PR&C invoice monitoring for non-CoC and non-ESG invoices).	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
Discussion and Basis for Conclusion						

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Standard D5	Guideline D5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency met budget and funding requirements for match.	<input type="checkbox"/> 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. <input type="checkbox"/> 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. <input type="checkbox"/> Cash match can come from any source, including non-CoC federal, State, local, private sources, and Program Income, as long as the funds are not statutorily prohibited to be used as match. <input type="checkbox"/> In-kind match includes the value of any property, equipment, goods, or services contributed to the project as match. Services provided by a third party must be documented by a Memorandum of Understanding. The agency documents the value of the in-kind match received.	<input type="checkbox"/> <u>Other</u> : CSB tracked match via monthly invoices to ensure the minimum percentages were met. <input type="checkbox"/> <u>File Review</u> : CSB reviewed cash and in-kind match source documentation, eligibility of use, and allowability of, via monthly monitoring of invoices for CoC programs. <input type="checkbox"/> <u>Other</u> : CSB tested disbursements to verify allowability, accuracy, completeness, and timeliness, via monthly UFA monitoring of invoices. <input type="checkbox"/> <u>Discussion</u> : The Agency explained how they determined the value of in-kind match to ensure they did not exceed fair market value (ICQ).	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	HUD-funded CoC/YHDP programs
Discussion and Basis for Conclusion						

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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 surplus areas when procuring services and goods. Agencies ensure the Buy America Preference requirements for CoC and ESG-funded procurement items are met.	<input type="checkbox"/> Agency procurement policies include recordkeeping requirements for outreach activities to minority and women-owned businesses and vendors in labor surplus areas. <input type="checkbox"/> If federal funding is used for construction, maintenance, repair, alterations, or rehabilitation, it must follow Buy America Preference requirements or have a documented waiver. <input type="checkbox"/> Staff can describe how the program maintains: (a) data on the racial, ethnic, and gender characteristics of 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)]	<input type="checkbox"/> <u>Policy Review</u> : CSB reviewed documentation of procurement efforts and associated recordkeeping. <input type="checkbox"/> <u>Discussion</u> : Agency described procurement activities (ICQ). <input type="checkbox"/> <u>Other</u> : CSB reviewed Partner and Vendor Leadership Demographic Questions	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

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Discussion and Basis for Conclusion

Standard D7	Guideline D7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency retains program income and adds it to the funds committed to the project.</p> <p>Program income for the grant is expended prior to the disbursement of grant funds.</p>	<p><input type="checkbox"/> The agency has a procedure that ensures that program income requirements are met.</p> <p><input type="checkbox"/> Program income is the income received by the agency, usually in the form of tenant rent, vending or laundry machine revenue. The agency adds the program income to the funds committed to the project.</p> <p><input type="checkbox"/> Agencies must report how program income was spent on monthly CoC invoices. Program income must be used for CoC-eligible activities.</p> <p><input type="checkbox"/> Program income can be used as Match.</p>	<p><input type="checkbox"/> <u>File Review</u>: CSB reviewed the Internal Control Questionnaire and documentation of program income as part of monthly invoice review and monitoring.</p> <p><input type="checkbox"/> <u>Discussion</u>: The agency explained its program income recording process (ICQ).</p> <p><input type="checkbox"/> <u>Discussion</u>: The agency explained how program income was expended before grant funds (ICQ).</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	HUD-funded CoC/YHDP programs

Discussion and Basis for Conclusion

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	<input type="checkbox"/> The agency submits a copy of the most recent audit report and management letter annually within 30 days	<input type="checkbox"/> <u>File Review</u> : A copy of the agency's audit report, management letter, and IRS 990	<input type="checkbox"/> Compliant		1	All programs

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<p>financial statements consistent with the following: (1) The audit is performed in accordance with generally accepted government auditing standards; (2) A single audit is performed in accordance with 2 CFR 200, Subpart F if the agency's aggregate federal expenditures exceed \$750,000; (3) The audit is performed within 6 months after the close of the agency's fiscal year; (4) The audit report, management letter, and IRS 990 are submitted to CSB within 30 days of being accepted by the agency's Board.</p>	<p>following the governing board's acceptance.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Board minutes reflect the board's review and acceptance of the audit report and management letter. Board minutes reflect review of IRS 990. <input type="checkbox"/> The agency submits a copy of the IRS 990 annually within thirty 30 days of submission to the IRS. <input type="checkbox"/> The agency notifies CSB if a delay is expected in receiving these documents. <input type="checkbox"/> The agency has a documented plan to follow up on any findings with corrective actions and a documented plan to remedy the finding(s). 	<p>were submitted to CSB by the required due dates.</p> <ul style="list-style-type: none"> <input type="checkbox"/> <u>File review</u>: Delays in submission of these documents were communicated to CSB. <input type="checkbox"/> <u>File Review</u>: The agency confirmed the governing board's acceptance of the audit report and management letter and review of the IRS 990. <input type="checkbox"/> <u>File Review</u>: CSB reviewed the audit report, management letter, and IRS 990 report and communicated the results of the review (i.e., annual organizational indicators report) to agency and board leadership within 6 months following receipt of the documents. 	<ul style="list-style-type: none"> <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A 			
<p>Discussion and Basis for Conclusion</p>						

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Standard D9	Guideline D9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>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.</p> <p>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.</p>	<p><input type="checkbox"/> In accordance with 2 CFR Part 200, for equipment purchases with federal funds:</p> <p>(1) Equipment records will be maintained accurately.</p> <p>(2) Equipment owned by the Federal Government will be identified to indicate Federal ownership.</p> <p>(3) A physical inventory of equipment will be taken and 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.</p> <p><input type="checkbox"/> (4) The agency will, in connection with the inventory, verify the existence, current utilization, and continued need for the equipment.</p> <p><input type="checkbox"/> Alternatively, the agency could have a policy stating that equipment is not being purchased with federal funds.</p>	<p><input type="checkbox"/> <u>Policy Review</u>: 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.</p> <p><input type="checkbox"/> <u>File review</u>: CSB reviewed documentation to ensure a physical inventory of equipment had occurred within the past 2 years.</p> <p><input type="checkbox"/> <u>Other</u>: CSB reviewed the inventory records and examples of identified equipment.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		2	All programs
Discussion and Basis for Conclusion						

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Standard D10	Guideline D10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency has a finance/accounting policies and procedures manual.</p> <p>The agency has written procurement policies.</p>	<p><input type="checkbox"/> The agency has a written, up-to-date policy and procedure manual for finance and accounting.</p> <p><input type="checkbox"/> The agency's procurement policies adhere to the following: (1) Standards covering conflicts of interest in the selection, award and administration of grants, contracts, or vendor selections and recusal from decision-making if such conflict exists; (2) No real or apparent conflicts of interest for employees, officers or agents in relationships with subrecipients or contractors; (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; (6) Ensure prequalified lists of vendors are current; (7) Methods of procurement are described and limits of each are noted (micro purchase, small purchase,</p>	<p><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the Internal Control Questionnaire, financial/accounting policies and procedures manual, and procurement policies.</p> <p><input type="checkbox"/> <u>Discussion</u>: Staff discussed recent updates.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		2	All programs

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	sealed bids, competitive proposals); (8) 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.	<input type="checkbox"/> Letterhead, website, or other publicity materials related to the program have the appropriate recognition of funding (funder logos or a written statement). <input type="checkbox"/> HUD does not require recognition of funding in publicity materials.	<input type="checkbox"/> <u>Other</u> : CSB reviewed letterhead, website, and/or applicable materials about CSB-funded programs and CSB funders for logos or written statements.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	All programs
Discussion and Basis for Conclusion						

Standard D12	Guideline D12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency's chart of accounts includes a	<input type="checkbox"/> The agency can provide a chart of accounts for each grant/program.	<input type="checkbox"/> <u>File Review</u> : CSB reviewed the chart(s) of accounts.	<input type="checkbox"/> Compliant		2	All programs

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complete listing of the account numbers used.			<input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A			
Discussion and Basis for Conclusion						

Standard D13	Guideline D13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has the following insurance provisions, notices, and certificates and upon request will furnish certificates evidencing the existence of the following: (1) Worker's Compensation Certificate; (2) Employment Practices Liability (EPL); (3) Employer's Liability; (4) Comprehensive General Liability (CGL); (5) Directors' and Officers' Liability (D&O); (6) Fidelity and Crime Insurance; (7) Umbrella Insurance over all primary coverage; (8) Property Insurance;	<input type="checkbox"/> All labor related documents must be posted in areas where all employees can see them and have access to them. <input type="checkbox"/> All insurances have current policies in force.	<input type="checkbox"/> <u>Other</u> : CSB confirmed posting of wage/hour notice. <input type="checkbox"/> <u>Other</u> : CSB reviewed various insurances to ensure they were current and in force.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	All programs

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(9) Wage and Hour Notice.						
Discussion and Basis for Conclusion						

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.	<input type="checkbox"/> There is evidence that managers review financial reports, budget to actual comparisons, and documentation. <input type="checkbox"/> The agency modifies it's grant budgets as needed.	<input type="checkbox"/> <u>Discussion or Policy Review</u> : The agency described or provided in writing procedures for management review. <input type="checkbox"/> <u>File Review</u> : CSB reviewed when budgets were modified throughout the fiscal year.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	All programs
Discussion and Basis for Conclusion						

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Standard D15	Guideline D15	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency does not do business with the enemy, as defined in 2 CFR 200.215.</p> <p>The agency does not contract with or procure services from telecommunications and video surveillance vendors listed in 2 CFR 200.216.</p>	<input type="checkbox"/> The agency ensures it does not do business with the enemy or purchase goods or services from telecommunications and video surveillance vendors that are prohibited.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs

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.