New requirements are in red text and do not apply for the 2024 PR&C review. These requirements will be applicable in 2025.

Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2024 PR&C review.

Bold are requirements that now apply for the 2024 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 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 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. □ 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. 	 Other: CSB reviewed the Internal Control Questionnaire and discussed items in question. Policy Review: Internal controls are documented in the financial policies. 	 □ Compliant with conditions □ Non-compliant □ N/A 		1	All programs
There is an adequate separation of duties. Discussion and Basis for O	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.					

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

			 scai Aummistration			
and/or allocated to		invoiced monthly or notify CSB	each monthly invoice to			
specific programs.		that a program has no costs	verify allowability,			
		for a month.	accuracy,			
Expenditures are			completeness, and			
reviewed and approved		Staff can describe how cash	timeliness (ARPA, HUD			
in compliance with		receipts are posted and can	CoC-and ESG-funded			
Generally Accepted		establish an audit trail for CSB	programs only).			
Accounting Principles		payments.	Payments to vendors			
and/or funding			were made within a			
requirements.		The agency can state name(s)	reasonable period. For			
		and title(s) of the employee(s)	non-CoC or non-ESG			
The agency received		responsible for ensuring that	programs, this is done			
prior written approval for		expenditures and payments	during the PR&C visit.)			
equipment purchases		are compliant with the				
with an acquisition cost		contract.	File Review: CSB			
of \$5,000 or more.			reviewed the grant			
		There is evidence the	expenses to verify			
Federal cash is only		payment review and approval	unallowable costs were			
drawn on an "as		process is being	not charged to the			
needed" basis and is not		implemented.	grants during invoice			
held more than 3			review.			
working days.		Grant expenditures do not				
The agency region discally		include unallowable costs,	File review: CSB			
The agency periodically		such as entertainment,	reviewed equipment			
reviews vendors to		contributions, donations,	purchases over \$5,000			
ensure they are not debarred or suspended		fines, penalties, general	during invoice review to			
from participation		governmental expenditures,	ensure agency followed			
related to federal		lobbying, political activities,	their own procedures			
awards.		and sales tax.	prior to purchase.			
awaras.			Discussions Ctoff			
Additional invoice		Equipment purchases	<u>Discussion</u> : Staff			
documentation		received prior written approval	explained how federal grant revenue is			
requested by the funder		to purchase either through the	reviewed to ensure			
is provided in a timely		Gateway budgeting process or	there is not an excess			
manner.		through electronic requests.	of cash on hand.			
			or basir on nana.			
	Щ.				1	

		Federal cash on hand is not held for longer than 3 working days. The agency does not do business with vendors that have been debarred or suspended from doing business with the federal	<u>Discussion</u> : Staff explained how the Agency ensures they do not do business with vendors excluded from doing business with the federal government.		
		government. Additional documentation for invoices is provided typically within 7 days and no more			
Discussion and Basis for 0	l Conc	than 30 days. clusion			

Standard D3	Guideline D3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the agency charges	☐ The agency uses one of the	Policy Review: CSB	Compliant			
indirect costs, it has an	following to charge indirect	reviewed the indirect			1	All programs
indirect cost allocation	costs to the grant:	cost allocation plan, if	Compliant			
plan that details the	(1) Federally-approved indirect	applicable.	with			
allocation methodology	cost rate (ICR) agreement. A		conditions			
and what expenses are	copy of the signed agreement	<u>File Review</u> : During				
included.	is submitted to CSB as soon	monthly invoice review,	Non-			
	as it is approved.	CSB tested that indirect	compliant			
	(2) 10% de minimis indirect	costs were applied				
	cost rate	consistently to all	N/A			
	(3) If the Agency uses a	grants/projects.	,			
	different method, a written					
	plan for allocating	File review: During				
	administrative costs is	monthly invoice review,				
	submitted to CSB for approval.	CSB ensured:				

	(4) Indirect cost plan approved	(1) that the federal		
	by the City of Columbus. A	ICR calculations and		
	copy of the indirect cost plan	basis was correct.		
	is submitted to CSB as soon	(2) that the 10% <i>de</i>		
	as it is approved.	minimis ICR		
	as it is approved.	calculations were		
	☐ Agencies cannot charge	correct, ensuring that		
	 Agencies cannot charge indirect costs on contracted 	the Agency used only		
		a modified total direct		
	costs. A contract is a formal	costs basis.		
	legal document for the	(3) that the City of		
	purpose of obtaining goods	Columbus indirect		
	and services for the agency's	cost rate calculations		
	own use and creates a			
	procurement relationship with	were correct.		
	the contractor. Contractor	(4) that the cost		
	costs are determined by the	allocation plan		
	presence of a formal legal	calculations were		
	contract.	correct.		
	☐ 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.			
	☐ 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.			
Discussion and Basis for (<u> </u>	<u>l</u>
	 			

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 and each employee's 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.	File Review: 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).	 Compliant with conditions Non-compliant N/A 		1	All programs
	· · · · · · · · · · · · · · · · · · ·					

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, via monthly monitoring of invoices for CoC programs.	□ Non-compliant□ N/A			
	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. In-kind match includes the value of any property,	☐ Other: CSB tested				
Discussion and Basis for 0	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 inkind match received.	Discussion: The Agency explained how they determined the value of in-kind match to ensure they did not exceed fair market value.				

0: 1 100	0.11.11	M. H. L. M. H.		0 116 1		
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.	Agency procurement policies include recordkeeping requirements for outreach activities to minority and women-owned businesses and vendors in labor surplus areas. If federal funding is used for construction, maintenance, repair, alterations, or rehabilitation, it must follow Buy America Preference requirements or have a documented waiver. 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)]	Policy Review: CSB reviewed documentation of procurement efforts and associated recordkeeping. Discussion: Agency described procurement activities. Other: CSB reviewed Partner and Vendor Leadership Demographic Questions	Compliant with conditions Non-compliant N/A		1	All programs

	D. Histai Administra
Discussion and Basis for Conclusion	

Standard D7		Guideline D7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency retains program income and adds it to the funds committed to the project. Program income for the grant is expended prior to the disbursement of grant funds.		The agency has a procedure that ensures that program income requirements are met. 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. Agencies must report how program income was spent on monthly CoC invoices. Program income must be used for CoCeligible activities. Program income can be used as Match.	File Review: CSB reviewed the Internal Control Questionnaire and documentation of program income as part of monthly invoice review and monitoring. Discussion: The agency explained its program income recording process. Discussion: The agency explained how program income was expended before grant funds.	Compliant Compliant with conditions Non- compliant N/A		1	HUD-funded CoC/YHDP programs
Discussion and Basis for	Co	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	☐ The agency submits a copy of the most recent audit report and management letter annually within 30 days	☐ File Review: A copy of the agency's audit report, management letter, and IRS 990	☐ Compliant		1	All programs

					1		
financial statements		following the governing	were submitted to CSB	Compliant			
consistent with the		board's acceptance.	by the required due	with			
following:			dates.	conditions			
(1) The audit is		Board minutes reflect the					
performed in		board's review and acceptance	File review: Delays in	Non-			
accordance with		of the audit report and	submission of these	compliant			
generally accepted		management letter. Board	documents were				
government auditing		minutes reflect review of IRS	communicated to CSB.	N/A			
standards;		990.		14,71			
(2) A single audit is			File Review: The				
performed in		The agency submits a copy of	agency confirmed the				
accordance with 2 CFR		the IRS 990 annually within	governing board's				
200, Subpart F if the		thirty 30 days of submission to	acceptance of the				
agency's aggregate		the IRS.	audit report and				
federal expenditures		the ins.	management letter				
exceed \$750,000;		The agency notified CCP if a	and review of the IRS				
(3) The audit is		The agency notifies CSB if a	990.				
performed within 6		delay is expected in receiving	990.				
months after the close of		these documents.	File Devilere OCD				
the agency's fiscal year;			File Review: CSB				
(4) The audit report,	Ш	The agency has a documented	reviewed the audit				
management letter, and		plan to follow up on any	report, management				
IRS 990 are submitted		findings with corrective actions	letter, and IRS 990				
to CSB within 30 days of		and a documented plan to	report and				
•		remedy the finding(s).	communicated the				
being accepted by the			results of the review				
agency's Board.			(i.e., annual				
			organizational				
			indicators report) to				
			agency and board				
			leadership within 6				
			months following				
			receipt of the				
			documents.				
Discussion and Basis for 0	Conc	clusion			•	•	1

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. 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.	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 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. Alternatively, the agency could have a policy stating that equipment is not being purchased with federal funds.	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. 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.	Compliant with conditions Non- compliant N/A		2	All programs
Discussion and Busis for C						

Standard D10	Guideline D10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Standard D10 The agency has a finance/accounting policies and procedures manual. The agency has written procurement policies.	Guideline D10 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 grants, contracts, or vendor selections and recusal from decision-making if such conflict exists; (2) No real or apparent conflicts of interest for	Monitoring Method Policy Review: CSB reviewed the Internal Control Questionnaire, financial/accounting policies and procedures manual, and procurement policies. Discussion: Staff discussed recent updates.	Conclusion Compliant Compliant with conditions Non- compliant N/A		Tier 2	All programs

Discussion and Basis for C	proposals); (8) Maintain documentation of procurements. 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.	 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 C	Conclusion					

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

complete listing of the account numbers used.			Compliant with conditions		
			Non- compliant		
			N/A		
Discussion and Basis for C	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;	 All labor related documents must be posted in areas where all employees can see them and have access to them. All insurances have current policies in force. 	 Other: CSB confirmed posting of wage/hour notice. Other: CSB reviewed various insurances to ensure they were current and in force. 	 □ Compliant with conditions □ Non-compliant □ N/A 		2	All programs

(9) Wage and Hour Notice.							
Discussion and Basis for Co	nclu	usion					
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.		There is evidence that managers review financial reports, budget to actual comparisons, and documentation.	<u>Discussion or Policy</u> <u>Review</u> : The agency described or provided in writing procedures for management review.	Compliant Compliant with conditions		2	All programs
Budgets are modified as needed following CSB guidance.		The agency modifies it's grant budgets as needed.	File Review: CSB reviewed when budgets were modified throughout the fiscal year.	Non- compliant N/A			
Discussion and Basis for Co	nclu	usion					

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