



We Are Columbia

City of Columbia, South Carolina

Community Development Block Grant – Disaster Recovery

Quality Assurance/Quality Control Plan

March 10, 2020

For CDBG-DR Funds

Disaster Relief Appropriations Act of 2016

(Public Law 115-31, August 14, 2017)

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1.0 INTRODUCTION

In October 2015, the City of Columbia, along with much of the State of South Carolina, experienced unprecedented and historic rainfall and flooding resulting from an upper atmospheric low-pressure system that funneled tropical moisture from Hurricane Joaquin. This heavy and extended rainfall exceeded a once in a thousand-year flood event with over two feet of rainfall in less than 48 hours. The rain and flooding caused extensive damage to many dams, bridges, roads, homes, and businesses in the state's capital. Most of the major and severe damages to housing occurred along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch areas of the city. As a result, the City of Columbia was awarded Community Development Block Grant-Disaster Recovery (CDBG-DR) funding under Disaster Relief Appropriations Act of 2016 (Public Law 115-31, Effective: August 14, 2017); (Public Law 114-3, Effective June 22, 2016), in order to rebuild the most damaged areas of the city and address the unmet needs of its citizens.

The City's CDBG-DR Quality Assurance and Quality Control (QA/QC) plan was developed to meet the requirements of the approved Action Plan and to outline a formal process to identify potential compliance issues and implement best practices for disaster recovery. More specifically, this plan and review checklists will assist the City of Columbia in complying with program monitoring requirements and:

- Perform file reviews and utilize data collected during the desk review process to improve program processes and procedures.
- Monitor that programs are operating within the terms of the Action Plan approved by HUD and program guidelines established by the City.
- Confirm that program expenditures/draw requests are eligible based on applicable laws and CDBG regulations.
- Report exceptions and concerns to reduce HUD monitoring concerns, findings, and/or repayment.
- Follow-up with identified compliance issues, initiate corrective actions, and implement program controls as necessary.
- Implement continuous process improvement.

In order to achieve these goals and meet federal requirements, the QA/QC Plan contains review protocols and checklists for the housing rehabilitation, Buyout/HMGP Local Share Match, and Elevation Reimbursement Programs.

The Rehabilitation Program Checklists were developed for the Columbia Homeowner Assistance Program (CHAP), Small Rental Repair Program (SRRP), and Minor Repair Program (MRP). The review checklists are to be completed at four phases of the rehabilitation process as outlined below.

- **Phase I: Applicant Eligibility and Benefit Determination Checklist**
Phase I of the QA/QC review will ensure that applicants qualify for program assistance,

have received all required program notifications, and confirm that Duplication of Benefits (DOB) procedures were properly implemented prior to the signing of a Grant Agreement with the program. Areas of review will include:

- Distribution and documented receipt of City of Columbia/HUD Required CDBG-DR Notifications
- Intake and Applications for Assistance
- Applicant Eligibility Determinations
- Duplication of Benefits (DOB) Analysis
- Uniform Relocation Act (URA) Applicability and Notifications
- National Objective Determination
- Prioritization for Assistance

▪ **Phase II: Pre-Construction**

Phase II of the review process will ensure that all pre-construction requirements are met prior to the issuance of a Notice to Proceed for construction work on an applicant's home. Areas to be reviewed for program compliance and necessary and reasonable costs are:

- Tier II Environmental Review Record/Clearance
- Damage Assessment
- Scope of Work
- Grant Award Calculation and Agreement
- Subrogation Agreement
- Property Covenant
- Temporary Relocation Assistance

▪ **Phase III: Post-Construction**

When construction is complete, a QA/QC review will be conducted to ensure that all paperwork and documentation related to the rehabilitation or reconstruction of the applicant's home is uploaded to their file prior to making a final payment to the contractor. Areas to be reviewed are:

- Contractor Eligibility and Licensure
- Project Bidding Process
- Construction Contract and Change Orders
- Interim Property Inspections
- Environmental Remediation and Notifications
- Compliance with URA
- Cost Reconciliation

▪ **Phase IV: Closeout**

Prior to close out of the applicant's file, a final QA/QC review will take place upon expiration of the one-year warranty period. Areas to be reviewed are:

- Final Acceptance of Work and Payment (including reconciliation of all project costs)
- Repair Warranty Notifications and Completion of Work
- Compliance Status of the Applicant

QA/QC checklists for each phase of review for rehabilitation projects are included in Exhibits A, B, C, and D.

The Buyout Checklists were developed for the Buyout/HMGP Local Share Match Program with review checklists completed at three phases of the buyout process as outlined below.

▪ **Phase I: Pre-Grant Agreement**

Phase I of the QA/QC review will ensure that applicants qualify for program assistance, document the completion of environmental reviews, and confirm that Duplication of Benefits (DOB) procedures were properly implemented before the signing of a Grant Agreement. Areas of review will include:

- Application for Assistance
- Applicant Eligibility Determinations
- Duplication of Benefits (DOB) Analysis
- Environmental Review
- Uniform Relocation Act (URA) Applicability and Notifications

▪ **Phase II: Post Grant Agreement**

Phase II of the review process will ensure that all pre-acquisition requirements are met before closing the sale of the property. Areas to be reviewed for program compliance and necessary and reasonable costs are:

- Property Ownership Title
- Pre-Storm Fair Market Value (FMV) Appraisals
- Pre-Closing Documentation and Offers to Purchase
- Uniform Relocation Act (URA) Pre-Grant Agreement Documentation

▪ **Phase III: Close Out**

Once the Buyout is complete, a QA/QC review will be conducted to ensure that all paperwork and documentation related to the property disposition and reuse are properly tracked and documented. Areas to be reviewed are:

- Property Tracking and Disposition
- Environmental Requirements for Disposition and/or Reuse
- Demolition and Asbestos Removal
- Closeout Requirements

QA/QC checklists for each phase of review for buyout projects are included in Exhibits E, F, and G.

The Elevation Reimbursement Checklists were developed to provide two levels of review as outlined below.

▪ **Phase I: Pre-Grant Agreement**

Phase I of the QA/QC review will ensure that the program has accurately captured the applicant's unmet need, ensuring that DOB analysis and program requirements are fully disclosed and understood by the applicants before the execution of a grant agreement and reimbursement. Areas of review will include the following:

- Application for Assistance
- Applicant Eligibility Determinations
- Duplication of Benefits (DOB) Analysis
- Environmental Review
- Uniform Relocation Act (URA) Applicability and Notifications
- Pre-Award Meeting

▪ **Phase II: Post-Grant Agreement**

Phase II of the review process will ensure that all program requirements are captured and memorialized in the program's grant and subrogation agreements, and property covenants. Areas to be reviewed for program compliance are:

- DOB/Award Calculation Documentation
- Uniform Relocation Act (URA) Post-Grant Agreement Documentation
- Inspections
- Post-Elevation Construction Documentation
- Closeout Requirements
- Applicant Appeals

QA/QC checklists for each phase of review for Elevation Reimbursement Projects are included in Exhibits H and I.

1.1 DEFINITIONS

Concern: A deficiency in program performance or documentation not based on a statutory, regulatory or program requirement. Concerns are identified to bring issues or discrepancies to the City's attention and, if appropriate, provide technical assistance and recommend best practices, process improvements, or methods to alleviate minor discrepancies. If unaddressed, some concerns have the potential to become a HUD finding.

Conformance: An affirmative indication or judgment that the condition of an item meets the requirement of relevant specifications, contract, and/or regulations; also, the state of meeting program requirements.

Corrective Action: Documented commitment of specific action planned or implemented to resolve a known condition or conditions that adversely affect compliance. Corrective actions must address both remedial action to correct the known discrepancy and action to prevent recurrence based on the identified root cause.

Disposition: The statement describing the way a deficiency of nonconformance is to be resolved.

Exception: Nonconformance findings which, for the City's reporting purposes, will consist of Concerns, Observations, and Findings/Material Exceptions.

Exception Report: A document that provides a closed-loop system for documenting, correcting, and verifying corrective actions of nonconforming conditions/materials.

Finding: The result of measuring QA/QC evidence (i.e. documentation) as compared to QA/QC criteria. Findings can show that QA/QC criteria are being met (conformity) or that QA/QC criteria are not being met (nonconformity).

Finding/Material Exception: A deficiency in program performance or documentation based on a statutory, regulatory, or program requirement(s) for which sanctions or other corrective actions are authorized by HUD. Findings can result in repayment of federal funding.

Internal Auditor: Individual responsible for independently directing the work of QA/QC Team and reporting outcomes to the Director of Community Development. The Internal Auditor also is responsible for recommending corrective actions and process improvements, and training program staff when necessary.

Observation: Data discrepancy or questionable practice noted during review of a file or program activity that can be resolved by providing documentation or modifying existing policies and procedures.

Nonconformance: An affirmative indication or judgment that a condition does not meet the requirement of relevant specifications, contract, and/or regulations; also, the state of not meeting requirements.

QA/QC Review: A planned, independent, documented activity to determine by investigation, examination, and evaluation of objective evidence the adequacy of and compliance with established process instructions, drawings, and other applicable documents, and the effectiveness of their implementation.

QA/QC Reviewer: Appropriately trained individual not having direct responsibilities in the areas being assessed.

QA/QC Team Leader: Individual responsible for organizing, conducting and reporting QA/QC results to the Internal Auditor. The QA/QC Team Leader may request that an individual with unique or specific expertise participate as a QA/QC team member.

Risk Profile: The amount and type of risk that an organization is willing to take to meet its strategic objectives.

(End of Section)

2.0 SCOPE & APPROACH

The City of Columbia CDBG-DR QA/QC Plan defines standard operating procedures (SOPs) to provide the Director of Community Development with practical guidance, tools, and real time information needed to maintain HUD/CDBG Compliance and to establish a formal process to identify and facilitate continuous programmatic improvement. The plan also provides the QA/QC Team with procedures for planning, conducting, and reporting on internal QA/QC activities. As written, the plan outlines a process to perform end-to-end reviews of all applicant files during the lifecycle of the City's housing rehabilitation, buyout, and elevation reimbursement programs as outlined below.

2.1 KEY OBJECTIVES

In order to design, plan, and properly execute the QA/QC plan for the City's housing rehabilitation programs, the following key objectives were defined:

- Evaluate the effectiveness and efficiency of process and operational controls on a real-time basis.
- Provide valuable information on review findings and recommendations via exception reports.
- Create and sustain an environment of continual process improvement by evaluating and addressing areas of concern based upon the likelihood and impact of non-conformance.
- Validate that risks are defined and managed.
- Ensure projected performance measures are achieved.

2.2 GUIDING PRINCIPLES

Quality Assurance/Quality Control review is an independent and objective activity intended to add value and improve the City of Columbia's CDBG-Disaster Recovery operations while reducing risks of HUD and program nonconformance. To achieve these objectives, the Internal Auditor and all QA/QC personnel will:

- Strictly adhere to the City of Columbia's approved Action Plan, Action Plan Amendments, policies, procedures, and standards when conducting applicant reviews or other QA/QC activities.
- Exercise impartial, unbiased professional care when completing QA/QC reviews.
- Exhibit the highest level of professional objectivity in gathering, evaluating, and communicating information, findings, and conclusions about the processes and data being examined.
- Ensure a balanced assessment of each file review by not being unduly influenced by their own interests or by others in forming judgments.

Any conflicts of interest encountered during QA/QC reviews will be reported to the Internal Auditor and the Director of Community Development, and the reviewer will be recused of performing any reviews that may constitute a conflict of interest.

2.3 SAMPLING AND SELECTION PROCEDURES

At this time, it is anticipated that 100% of all applicant files will be reviewed for compliance with HUD regulations and program policies. When a level of confidence in program outcomes has been achieved, the City may elect to review a sampling of program files for some or all of the CDBG-Disaster Recovery programs. If the City elects to review a subset of files for each program, the use of effective QA/QC sampling procedures will be necessary to increase the coverage, focus, and efficiency of QA/QC reviews.

If the program elects to employ a sampling methodology, the QA/QC Team Lead must follow best practices when selecting samples for QA/QC review and should confirm that each sample is statistically significant to the overall population or the sub-population being assessed. In advance of selecting the statistically significant samples, the Internal Auditor and/or QA/QC Team Lead must define the population or sub-population to ensure that the sample is selected from the appropriate data set and can adequately represent the QA/QC sample.

With a statistically significant sample, the Internal Auditor and/or QA/QC Team Lead can project the results of the sample to the population or sub-population with a method of projection consistent with that used to select the sample. The projection of the sample may involve estimating probable errors or deviations in the population. Consideration should also be given as to whether the use of sampling has provided a reasonable basis for conclusions about the population tested.

The Internal Auditor and/or QA/QC Team Lead also may utilize various sampling methodologies to ensure that the integrity of the sample selection remains intact and offers confidence in the results or findings. For this reason, it is important that the QA/QC Plan utilize industry accepted guidance and standards on sampling along with the specific design of the QA/QC function to confirm the appropriate sampling technique is used.

Techniques for QA/QC sampling that may be deployed in subsequent reviews are varied. Sampling techniques that may be used on the City of Columbia's QA/QC reviews may include but are not limited to:

1. **Random Sampling:** Selection is not governed by predetermined considerations; every unit in the population has equal opportunity of being selected.
2. **Monetary Unit Sampling:** Used to identify monetary random values. For example, in using this approach, the QA/QC Team can select every 10,000th dollar of scope of works to review and extrapolate findings and/or exceptions across the population.

3. **Attribute Sampling:** Used to determine the characteristics of a population being evaluated.
4. **Variable Sampling:** Designed to predict the value of a given variable for a population.
5. **Discovery Sampling:** Used where evidence of a single error or instance would call for intensive investigation.
6. **Stratification Sampling:** The process of segregating a population into homogenous subpopulations explicitly defined so that each sampling unit can belong to only one subpopulation depending on the criteria used for stratification.

Using a variety of techniques, the QA/QC Team Lead can analyze possible sample errors to validate that errors exist and determine the nature and cause of the errors. When errors are assessed additional testing may be required.

2.4 REPORTING AND ISSUE RESOLUTION

2.4.1 QA/QC FINDINGS

Before a QA/QC finding is presented to the Director of Community Development, all initial review findings should be validated by a secondary QA/QC review conducted by the QA/QC Team Lead. Exception findings should be classified according to their impact on the outcome of an application as follows:

- **Observations/Concerns:** Findings that do not impact the outcome of the application's eligibility, grant award amount, or program/HUD compliance.
- **Findings/Material Exceptions:** Findings that are likely to result in a HUD finding, program sanctions, and/or monitoring findings that require repayment of federal funds.

The QA/QC Team Lead will maintain a complete and accurate record of both Observations/Concerns and Findings/Material Exceptions. All exceptions (Observations/Concerns and Findings/Material Exceptions) will be reported to the Director of Community Development so corrective measures can be taken and if necessary, new process controls can be implemented to prevent future exceptions.

The QA/QC Team Lead will maintain a record of all applications reviewed, which will be the basis for reporting to the Director of Community Development. The QA/QC Team Lead will prepare exception reports detailing the applications reviewed, exceptions identified, and the type of review(s) conducted.

2.4.2 EXCEPTION REPORT

On a bi-weekly basis, the QA/QC reviewer will provide the CDBG Disaster Recovery Manager and the QA/QC Team Lead with an exception report that identifies the Observations/Concerns and Findings/Material Exceptions found within the previous two week's application reviews. Each report will summarize the number of reviews conducted, identify exceptions and trends compared to historical rates, indicate the number of follow-up reviews conducted and the outcome of those reviews, and recommend corrective actions. Reports will also contain a detailed list of applications, associated QA/QC review(s), and the applications containing exceptions.

The QA/QC Team Lead will report the information detailed above to the Director of Community Development on a monthly basis. If an Observation/Concern or Finding/Material Exception is discovered that requires immediate escalation and corrective action, the QA/QC Team Lead will notify the Director of Community Development and the Internal Auditor as soon as possible and document the exception within the monthly report.

2.4.3 COMPLIANCE REVIEW MEETING

A compliance review meeting will be held monthly to discuss findings and resolutions. As part of the agenda for the meeting, the QA/QC Team Lead will:

- Provide additional information requested for all exceptions.
- Include input from the CDBG Disaster Recovery Manager regarding the validity of the previous month's exceptions.
- Reach a consensus on exceptions previously disagreed upon.
- Discuss recommendations for remediation.
- Report on status of corrective actions.

2.4.4 ISSUE RESOLUTION

The communication of the QA/QC Observations/Concerns and Findings/Material Exceptions to program vendors and contractors will be the responsibility of the appropriate CDBG Disaster Recovery staff. The forum, frequency, and detail of discussions for QA/QC findings will be at the discretion of the Director of Community Development.

To accurately track the outcome of exceptions, the QA/QC reviewer will notify the CDBG Disaster Recovery Manager and the QA/QC Team Lead in writing of the previous two weeks' exceptions, whether the exceptions are valid and if additional comments are needed. All Findings/Material Exceptions and Observations/Concerns that are systemic in nature will require the responsible vendor(s) to provide a corrective action plan.

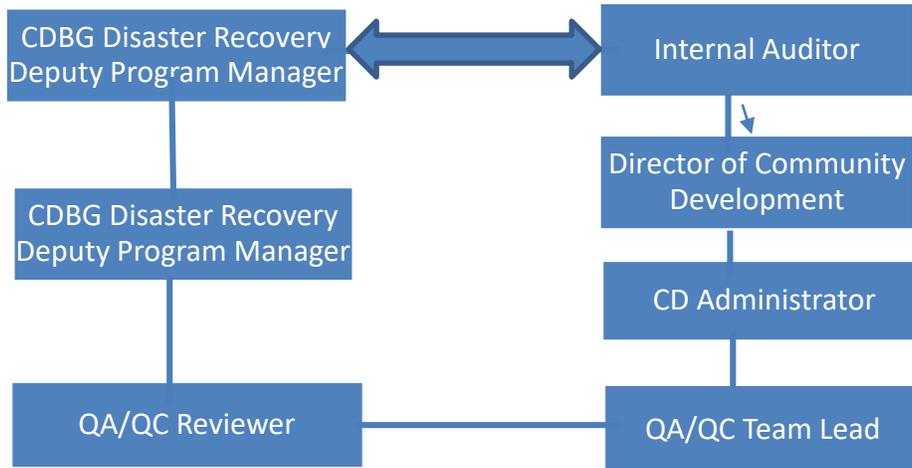
The QA/QC Team Lead will report exceptions and resolutions to the Director of Community Development at each compliance review meeting. In the event a consensus cannot be reached on whether or not an exception is valid, the issue will be escalated to the City's Internal Auditor for a final decision. If the Internal Auditor determines the exception is valid, the QA/QC Team will follow its standard protocol.

2.4.5 QUARTERLY REPORT

An executive QA/QC quarterly report will identify the number of files reviewed, the number of follow-up reviews, and a summary of exceptions, the exceptions corrected, and additional controls implemented to mitigate risk. The report also will provide a comparison of the reporting quarter’s findings and performance to historical quarters for stakeholders to assess program improvement over time. The first report will be generated and issued after Q2 2018.

2.5 ORGANIZATIONAL STRUCTURE

An independent Internal Auditor and QA/QC Team is essential to successfully identifying and resolving compliance issues and risks. The organizational structure outlined below is based upon discussions during development of the City’s Risk Assessment, Pre-Award Implementation Plan, and Action Plan.



In the proposed model, the City Disaster Recovery Manager & Internal Auditor (IA) have a reciprocal communication method. The QA/QC Team Lead work and IA are responsible for managing the assigned scope and performing secondary quality reviews. The CDBG Disaster Recovery Compliance Coordinator serves as the QA/QC reviewer reporting information to the QA/QC Team Lead and the CDBG Disaster Recovery Deputy Program Manager. As the City’s housing programs evolve, the organizational structure will be reviewed to maintain an appropriate ratio of reviewers for applicant populations.

It is also important that the Internal Auditor and QA/QC Team Lead remain independent from other functional areas within the Community Development Department to maintain the integrity of the QA/QC program. While some cross-work and shared responsibilities are inevitable, intersection of these duties should be minimized where possible.

3.0 HUD COMPLIANCE/PROGRAM EXECUTION

To achieve HUD compliance, grantees must ensure programs are operating in accordance with federal requirements, CDBG guidelines, and approved program policies. It is also necessary to ensure that applicant files contain complete and accurate documentation related to their grant award. The lack of adequate monitoring of applicant files could result in program sanctions, HUD monitoring findings, questioned costs, potential recapture of funds, and/or repayment of CDBG funds.

3.1 RISK ASSESSMENT

As QA/QC reviews are conducted, the Internal Auditor and the QA/QC Team Lead have the tools to measure and quantify program risks using the HUD Compliance risk matrix shown below. The matrix is a dynamic document and is continuously updated as new risks are identified, new operational and process controls are implemented, and as vendors/contractors become more knowledgeable about their processes, etc. The risk assessment will be updated based upon, but not limited to:

- Assessments of program operating documentation including Standard Operating Procedures, the Action Plan, and other program artifacts.
- HUD findings or recommendations.
- Trends in exception observations.
- Modified or newly approved policies.

HUD compliance risks are quantified using two variables:

- Probability of a risk occurring (measured as a probability percentage).
- Probable negative impact to operations if the risk is realized (measured on a scale of 1 to 10 with 10 being the most severe).

Those risks with the highest probability of occurring and the highest probable impact will become the highest priority and will be the most scrutinized during QA/QC reviews.

A sample HUD Compliance risk matrix is shown below.

Risk Matrix							
Risk / Event	Potential Outcome	Probability	Impact	Risk Score	Risk Management Strategy	Who	Status
ENVIRONMENTAL							
Tier II completed after a "choice limited action" (i.e. initiating construction or signing of Grant Agreement)	HUD Finding and Repayment.	About 50% chance of occurring	Critical	30	Identified and communicated to the initial 30 day assessment and HUD compliance review. The applicant ID's of non-compliant files were listed in weekly and roll up reports.	Name	Complete
Lead Based Paint work is not incorporated or is incorrectly incorporated into the Scope of Work	Potential life safety issues for workers, applicants, and tenants. HUD finding and/or repayment. Potential litigation.	Highly likely to occur	Critical	50	Identified and communicated to HRO during HUD compliance and other QA/QC reviews. LBP process was provided to HRO at the beginning of the project. Karim's review of LBP files and regular meetings with HRO.	Name	Ongoing

3.2 PROGRAM ANALYTICS

All HUD Compliance/Program Execution exception findings (Observations/Concerns and Findings/Material Exceptions) will be recorded and stored in an offline system that is separate from the City of Columbia’s system of record. The QA/QC Team will utilize the Quickbase development platform to maintain its offline records and database. The QA/QC checklists will be completed and uploaded to the QA/QC Team’s Quickbase system for document storage. The structured, consistent data format of (QA/QC checklists will be the foundation for the offline database. The Quickbase system will be used to develop the application that will maintain and manage the database.

The Internal Auditor and QA/QC Team Lead will use the offline database to perform all analyses needed for the monthly and quarterly HUD Compliance exception reports. The monthly HUD Compliance exception reports will contain at a minimum: the number of applications reviewed, the number of applications containing Observations/Concerns and Findings/Material Exceptions, the total number of Observations/Concerns and Findings/Material Exceptions, and a trend analysis of exceptions compared to previous months and the historical average. Also, the reports will list in detail the exceptions identified for each Applicant. The quarterly reports will contain the same analyses based on a quarterly reporting period.

In addition to the standardized reports, the offline database will also be used to run all ad-hoc HUD Compliance analyses; including analyses that the Internal Auditor and/or QA/QC Team Lead may use to plan and facilitate its QA/QC reviews. When necessary, the Quickbase application will be used in conjunction with the offline system to perform analyses.

3.3 SAMPLE AND SELECTION

Given that the City of Columbia’s funding is contingent upon HUD compliance, it is recommended that all applicant files processed to date be reviewed for HUD compliance to establish a baseline rate of compliance.

After the QA/QC review is completed for the backlog of all files in progress, reviews will then be conducted at the conclusion of four main phases in the program: Phase I Applicant Eligibility and Benefit Determination, Phase II Pre-Construction, Phase III Post-Construction, and Phase IV Close Out.

As the program matures and the QA/QC Team completes more file reviews, the Internal Auditor, in conjunction with the QA/QC Team Lead, should periodically assess the sample size of the review. The primary factors for modifying the QA/QC sample size should be based upon the following:

- The frequency of observed Findings/Material Exceptions.
- The City of Columbia's risk profile in relation to the repayment of HUD funds.

The Internal Auditor, in conjunction with the QA/QC Team, may at any point deviate, modify, or change its sample selection methodology and sample size based upon QA/QC findings. Any changes will be documented in the QA/QC Plan.

3.4 REVIEW PROCEDURES AND TOOLS

All HUD and program compliance reviews will use standardized comprehensive checklists for each program phase, which is essential given that applicant files will be reviewed at various stages of the City of Columbia's process. Copies of the nine QA/QC review checklists are included in the Plan as Exhibits A, B, C, D, E, F, G, H, and I.

A QA/QC reviewer will perform the primary review and complete the checklist utilizing information found within the Quickbase System. A secondary QA/QC review, conducted by the QA/QC Team Lead, will assess the potential exception findings identified by the initial reviewer. In the event that the secondary reviewer observes information that leads him/her to disagree with the initial reviewer's findings, the initial and secondary reviewer will resolve the disagreement by reviewing the information and facts together. If the reviewer and Team Lead cannot reach a consensus on the exception finding, the Team Lead will refer the issue to the Director of Community Development and the Internal Auditor. All decisions made by the Internal Auditor will be considered final unless the Internal Auditor requires input from the Community Development Department or City Executive Management Team.

When the QA/QC Team has completed its review of the backlog of applications, the QA/QC Team will modify its procedures to perform real time file reviews at each phase of the process. The Internal Auditor and/or QA/QC Team Lead will determine the real-time populations requiring QA/QC HUD reviews in each Phase based on monthly and/or quarterly reports.

Supplemental to the QA/QC checklist reviews, the Internal Auditor and/or QA/QC Team Lead will also perform targeted reviews of all previously identified exceptions. These follow-up reviews will confirm whether corrective actions have been completed in accordance with HUD regulations and program policies.

All checklist reviews will be completed electronically and uploaded to the QA/QC Team's Quickbase System, which will be used to run queries on the completed checklists within the HUD Compliance library. These queries will inform the monthly exception reports provided to the

Director of Community Development. Monthly exception reports will be in Microsoft Word and Microsoft Excel format.

As an applicant's files are determined to be complete and compliant, the corresponding checklist will be uploaded in PDF format to the Quickbase System for review by the Director of Community Development and HUD during monitoring visits.

3.5 CONTINUOUS IMPROVEMENT

The QA/QC Team Lead will recommend corrective actions for all exceptions identified within the QA/QC reviews. Based upon trends observed during its file reviews and the exception root causes, the QA/QC Team Lead may recommend additional HUD training to improve quality and mitigate future exceptions. If requested by the Director of Community Development or the Internal Auditor, the QA/QC Team Lead will either provide training materials or conduct training to ensure all personnel have a thorough understanding of HUD requirements and program guidelines.

The primary objective of QA/QC reviews is to identify opportunities for improvement in operations, efficiency, quality, and compliance using the DMAIC process (Define, Measure, Analyze, Implement, & Control) as shown in Figure 1. The DMAIC process and how it corresponds to QA/QC reviews of the City's CDBG-Disaster Recovery Programs is outlined below.

Define: HUD regulations and program requirements as outlined in the approved Action Plan, CDBG-Disaster Recovery policies, and program Standard Operating Procedures will determine the criteria by which applicant files are measured. If new requirements are issued by the program or HUD, the requirements will be reviewed by the QA/QC Team Lead and incorporated into the QA/QC checklists as necessary.

Measure: In its review of applicant files, the QA/QC Team will offer an independent, unbiased measurement of quality of files and program processes in relation to HUD compliance. The review checklists, attached as Exhibits A through I, will be the primary tools used to gather information on compliance with HUD regulations and program policies.

Analyze: The QA/QC Team will assess each criterion within the checklist to determine if the application complies with HUD and program requirements. If an exception is observed, the QA/QC Team will analyze the circumstances surrounding the exception to identify its root cause and communicate this information to the Director of Community Development within the monthly reporting.

Using real-time application reviews, the QA/QC Team will gather

HUD and programmatic compliance data to analyze exceptions and gauge the effectiveness of operational controls over time.



Figure 1

Implement: After assessments and analysis of exceptions and exception trends, the Internal Auditor and/or QA/QC Team Lead will recommend ways to improve HUD and programmatic compliance ranging from a corrective action for a singular application to the implementation of new operational controls. The Disaster Recovery team will correct non-conforming findings. For corrective actions for individual applications, the QA/QC Team will conduct follow-up reviews to confirm that the exception has been remediated. When new operational controls are developed to address system-wide compliance exceptions, the Internal Auditor and/or QA/QC Team Lead will confirm that the control adequately mitigates the risk of nonconformance.

Control: Ongoing compliance reviews establish a process to continually evaluate applications for assistance while sustaining an environment of continual improvement. As stated in the Define section, the checklists will be updated as new HUD or programmatic requirements are introduced, new operational controls and processes are put in place, and new policies and procedures are developed.

5.0 PROCESS IMPROVEMENT

Quality Assurance and Quality Control are valuable tools that inform the overall process and quality management program. QA/QC allows an organization to measure performance at each step of a process, thereby establishing a reliable baseline. A properly designed and implemented QA/QC protocol also affords employee feedback and interaction that enables the organization to design changes with the highest potential for success.

Benchmarking is a competitive method used to evaluate the success of an organization over time. The practice calls for an in-depth study of individuals within a system to determine “best in class” within their niche, with the goal of analyzing how a successful team member or process operates with respect to a particular practice, emulating and improving upon it whenever possible.

Workforce participation is crucial, empowering a well-trained staff that is committed to process improvements. This level of participation is often reinforced through recognition systems, highlighting individual and team achievements.

Continuous education and training for program staff drives a culture of self-improvement that leads to the retention of valuable team members who view themselves as having a stake in organizational success. As a result, staff members are more willing to take on additional responsibilities, communicate more effectively, act creatively, and innovate.

Beyond identifying qualitative information on system performance, the QA/QC program will provide the Director of Community Development with a wealth of data that can better measure the success of its CDBG-DR programs. If used properly, this information can be a powerful management tool to identify areas that are meeting expectations and, conversely, those that require improvement.

The proposed database of the QA/QC program will enable measurement of a large quantity of variables. For example, information will be available to compare the performance of one CDBG-DR program against another, one individual against another within a single vendor, one individual performing one task or type of work versus another, etc. This enables City management to identify top performers and those that may need additional training. Understanding the characteristics employed by a top performer enables the program to leverage practices across the broader resource pool and allows the program to target high proficiency resources.

6.0 TRAINING

Beyond the recommendations made in compliance review reports, QA/QC can be a valuable tool in educating program staff giving the City the advantage of reviewing a significant population of program applications and utilizing these reviews to gain a strong understanding of common, systematic issues.

Gathering information on work product, root cause investigations, and opportunities for improvement, the Internal Auditor and/or QA/QC Team Lead will provide supplemental training on those subjects that the Director of Community Development believes are necessary for program success.

The QA/QC process, if performed in real time, can also determine when a new employee or an employee performing a new task is adequately trained and acceptably proficient. The program might target a one hundred percent review of all work generated by an individual to ensure that they comprehend their task, are employing standard operating procedures, and are meeting program quality expectations. As the employee becomes more proficient (demonstrated through the QA/QC process) the quantity of reviews is reduced until the employee is fully effective. In this stage-gate approach, the results of the review are typically used as a tool shared with the employee or their manager to better tailor their on-boarding and training process.

An additional benefit of a strong QA/QC program is the ability to measure the impact of training.

7.0 IMPLEMENTATION SCHEDULE

The proposed implementation approach for application of all QA/QC objectives is cyclical in nature. For each phase of review the process will follow seven distinct steps, including:

1. Develop measurement tools with approval by the Director of Community Development.
2. Review files to establish a baseline.
3. Identify and quantify key risk factors.
4. Refine quality assurance protocols to track risk exposure.
5. Communicate results to the Director of Community Development.
6. Training and process improvement.
7. Ongoing quality assurance to verify success.

When desired results are achieved and verified through quality assurance, a new baseline is established, and the process is repeated (see Figure 2). While this does not attest to the overall proficiency of the system, it does allow for maximum impact and resource utilization.

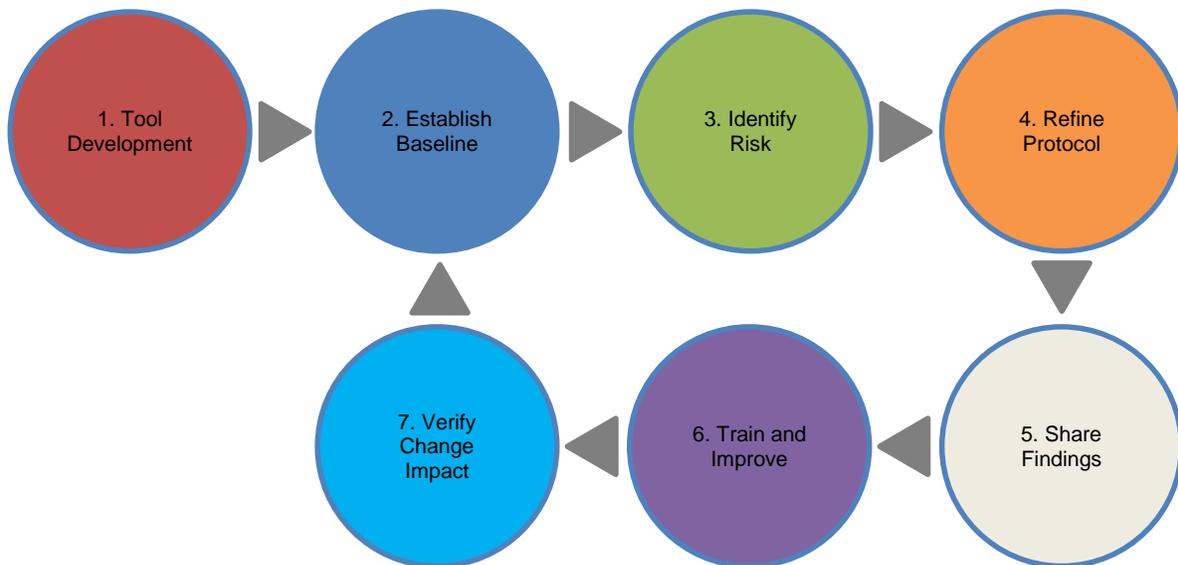


Figure 2

The following table (Figure 3) describes the proposed implementation timeline:

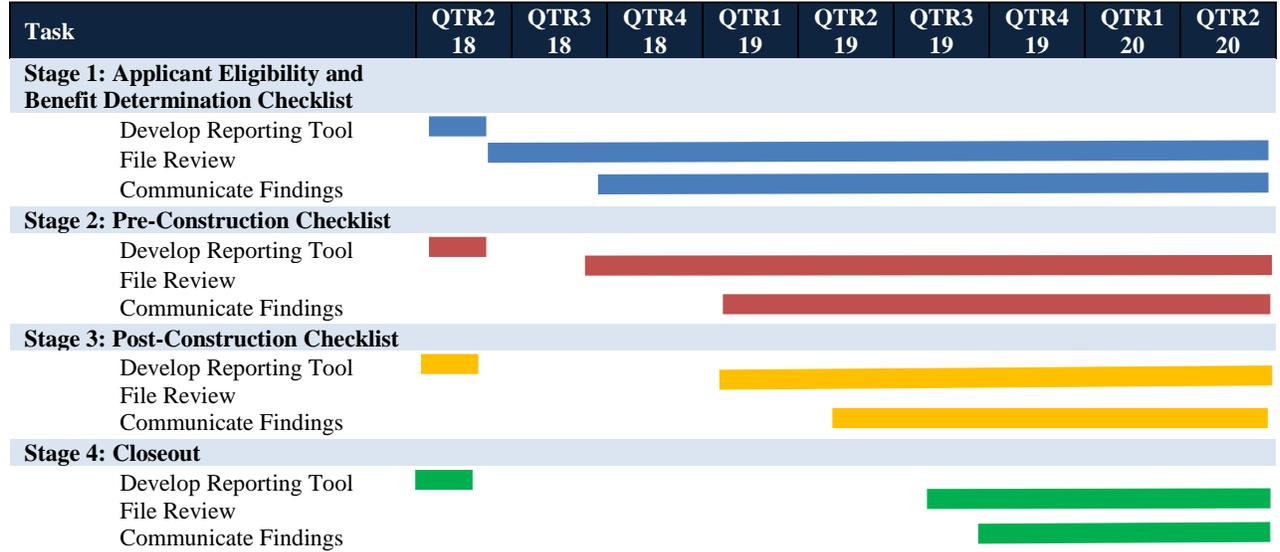


Figure 3

EXHIBIT A:
STAGE 1: APPLICANT ELIGIBILITY AND
BENEFIT DETERMINATION CHECKLIST



Exhibit A
Phase I: Applicant Eligibility & Benefit Determination Checklist
 City of Columbia CDBG-DR Program

Drop Down Box Options

**Reporting Outcomes
 (Indicators of Failed Review)**

0.00 File Review Information			
0.01	Date of review	Date:	N/A
0.02	Initials of Reviewer	Initials:	N/A
0.03	Start time of the review:	Start time:	N/A
0.04	End time of the review:	End time:	N/A
0.05	Total duration (hours: minutes):	Duration:	N/A
1.00 Applicant Information			
1.01	Application ID#		MANUAL ENTRY
1.02	Applicant Name: First:	Last:	MANUAL ENTRY
1.03	Damaged Address:	Street:	MANUAL ENTRY
		Unit or Apartment:	MANUAL ENTRY
		County:	MANUAL ENTRY
		State:	MANUAL ENTRY
		ZIP Code:	MANUAL ENTRY
1.04	Select CDBG-DR Housing Rehabilitation Program Under Review:		Drop Down Options: CHAP, SRRP, ERP, MRP
2.00 Applicant Intake			
2.01	Did the applicant sign a receipt for the "Asbestos In Your Home" brochure?		Drop Down Box Options: YES, NO, N/A
2.02	Did the applicant sign a receipt for the "Protect Your Family From Lead in Your Home" brochure?		Drop Down Box Options: YES, NO, N/A
2.03	Is there a copy of the General Information Notice (GIN) in the applicant's file?		Drop Down Box Options: YES, NO, N/A
2.04	If yes, is there a applicant signed receipt for the GIN?		Drop Down Box Options: YES, NO, N/A
2.05	Is the property tenant occupied at the time of intake?		Drop Down Box Options: YES, NO, FRR
2.06	If yes, is there a copy of the General Information Notice (GIN) for the tenant in the applicant's file?		Drop Down Box Options: YES, NO
2.07	If yes, is there a tenant signed receipt for the GIN?		Drop Down Box Options: YES, NO
2.08	Did the applicant sign a receipt for the "City of Columbia Grievance Procedures"?		Drop Down Box: Yes, No
2.09	Is the application for assistance uploaded to the applicant's file?		Drop Down Box: YES, NO
2.10	If yes, is the application complete and signed by the applicant?		Drop Down Box: YES, NO
2.11	If yes, has all required documentation been uploaded with the application?		Drop Down Box: YES, NO
2.12	If no, list all missing documentation.		Manual Entry
2.13	Has the applicant provided the city with a signed Right-of-Entry form and permission to act on their behalf during the bidding process?		Drop Down Box: YES, NO
2.14	If the applicant has vacant units at the time of application to the program, were they advised that the issuance of "Move-In" Notices are required prior to the leasing of a vacant unit to a tenant (s)?		Drop Down Box: YES, NO
3.00 Applicant Eligibility			
3.01	Is the applicant's proof of identification uploaded to the file?		Drop Down Box Options: YES, NO
3.02	If yes, what form of photo identification was provided?		Drop Down Box Options: Driver's license, passport, military identification
3.03	Is proof of applicant income uploaded to the file?		Drop Down Box Options: YES, NO
3.04	If yes, what income documentation was uploaded to the file?		Drop Down Box Options: IRS Form 104, bank statements, 3 pay stubs, Social
3.05	If yes, has an income calculation worksheet been uploaded to the file?		Drop Down Box Options: YES, NO
3.06	If yes, are the correct income limits being utilized?		Drop Down Box Options: YES, NO
3.07	If yes, does the applicant qualify as low-to-moderate income?		Drop Down Box Options: YES, NO
3.08	Which National Objective is selected for the file?		Drop Down Box Options: LMI, Urgent Need
3.09	Is the correct National Objective selected?		Drop Down Box Options: YES, NO, FRR
3.10	Is proof of ownership uploaded to the applicant's file?		Drop Down Box Options: YES, NO
3.11	If yes, what ownership documentation has been provided?		Drop Down Box Options: Deed, Warranty Deed, Notarized Affidavit,
3.12	If yes, is the documentation uploaded to the applicant's file sufficient to demonstrate ownership of the damaged address?		Drop Down Box Options: YES, NO, FRR
3.13	Is documentation uploaded to the file to demonstrate that the damaged address was the applicant's primary residence on October 5, 2015?		Drop Down Box Options: YES, NO
3.14	If yes, what primary residency documentation is uploaded to the applicant's file?		Drop Down Box Options: Asset verification, utility bill, voter's registration,
3.15	If yes, is the documentation uploaded to the applicant's file sufficient to demonstrate primary residency at the damaged address?		Drop Down Box: YES, NO, FRR
3.16	Is the damaged property address located within the city limits of Columbia?		Drop Down Box: YES, NO, FRR
3.17	Is the applicant's property an eligible structure type for the program?		Drop Down Box: YES, NO, FRR
3.18	Is there documentation in the file to show the year that the structure was built?		Drop Down Box: YES, NO, FRR
3.19	Did the applicant register for FEMA assistance?		Drop Down Box: YES, NO, FRR
3.20	If yes, enter the applicant's FEMA registration number?		Numerical Entry
3.21	Is the applicant current on their property taxes?		Drop Down Box: YES, NO, FRR
3.22	If yes, is a property tax statement uploaded to the applicant's file?		Drop Down Box: YES, NO
3.23	If no, is there a tax deferral statement, tax exemption, or tax payment plan uploaded to the applicant's file?		Drop Down Box: YES, NO
3.24	Is the applicant required to have flood insurance?		Drop Down Box: YES, NO
3.25	If yes, is proof of flood insurance uploaded to the applicant's file?		Drop Down Box: YES, NO
3.26	What is the FEMA classification for damage to the applicant's home?		Drop Down Box: Severe, Major High, Major Low, Minor High, Minor Low
3.27	Does the level of damage of the home qualify for program assistance?		Drop Down Box: YES, NO
3.28	If the applicant was determined to be eligible for the program, was a letter of eligibility issued to the applicant?		Drop Down Box: YES, NO
2.29	If yes, was a copy of the eligibility letter uploaded to the applicant's file?		Drop Down Box: YES, NO

4.00	Duplication of Benefits (DOB) Review		
4.01	Is a Duplication of Benefits (DOB) analysis uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
4.02	If yes, has the DOB analysis been acknowledged and certified by the applicant?	Drop Down Box: YES, NO	NO
4.03	Did the applicant certify that they received FEMA Benefits?	Drop Down Box: YES, NO	YES
4.04	If yes or no, was the amount of assistance or lack of assistance verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO	N/A
4.05	If yes, were the FEMA benefits provided duplicative in nature?	Drop Down Box: YES, NO	NO
4.06	If yes, was documentation of the amount FEMA benefits uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
4.07	If yes, was the correct amount of FEMA benefits disbursed used in the DOB calculation?	Drop Down Box: YES, NO	NO
4.08	Did the applicant certify that they received a SBA loan?	Drop Down Box: YES, NO	NO
4.09	If yes or no, was the amount of the loan or lack of assistance verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO	N/A
4.10	If yes, was the SBA loan duplicative in nature?	Drop Down Box: YES, NO	YES
4.11	If yes, was documentation of the amount of the SBA loan uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
4.12	If yes, was the correct amount of the SBA loan used in the DOB calculation?	Drop Down Box: YES, NO	NO
4.13	Did the applicant certify that they received homeowner's insurance for damage to their home?	Drop Down Box: YES, NO	N/A
4.14	If yes or no, was the amount of the insurance or lack of insurance verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO	NO
4.15	If yes, was the homeowner's insurance received duplicative in nature?	Drop Down Box: YES, NO, FRR	NO
4.16	If yes, was documentation of the amount of the homeowner's insurance uploaded to the applicant's file?	Drop Down Box: YES, NO, FRR	NO
4.17	If yes, was the correct amount of the homeowner's insurance used in the DOB calculation?	Drop Down Box: YES, NO, FRR	NO
4.18	Did the applicant certify that they received flood insurance for damage to their home?	Drop Down Box: YES, NO, FRR	NO
4.19	If yes or no, was the amount of the flood insurance or lack of insurance verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO, FRR	NO
4.20	If yes, was the flood insurance received duplicative in nature?	Drop Down Box: YES, NO, FRR	YES
4.21	If yes, was documentation of the amount of the flood insurance uploaded to the applicant's file?	Drop Down Box: YES, NO, FRR	NO
4.22	If yes, was the correct amount of the flood insurance used in the DOB calculation?	Drop Down Box: YES, NO, FRR	NO
4.23	Did the applicant certify that they received ICC funding for their home?	Drop Down Box: YES, NO, FRR	NO
4.24	If yes or no, was the amount of the ICC funding verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO, FRR	NO
4.25	If yes, was the ICC funding received duplicative in nature?	Drop Down Box: YES, NO, FRR	YES
4.26	If yes, was documentation of the amount of the ICC funding uploaded to the applicant's file?	Drop Down Box: YES, NO, FRR	NO
4.27	If yes, was the correct amount of the ICC funding used in the DOB calculation?	Drop Down Box: YES, NO, FRR	NO
4.28	Did the applicant certify that they received other assistance for their home from a VOAD or non-profit organization?	Drop Down Box: YES, NO	YES
4.29	If yes or no, was the type and amount of assistance verified either through applicant provided information or third party verification?	Drop Down Box: YES, NO	N/A
4.30	If yes, was the assistance received duplicative in nature?	Drop Down Box: YES, NO	YES
4.31	If yes, was documentation of the type and/or amount of assistance uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
4.32	If yes, was the correct amount of assistance used in the DOB calculation?	Drop Down Box: YES, NO	NO
4.33	Is the DOB calculation used in the applicant's file correct?	Drop Down Box: YES, NO	NO
4.34	Based upon the review of unmet need and DOB, do the applicant's unmet needs exceed the program's minimum threshold for assistance?	Drop Down Box: YES, NO	NO
4.35	Based upon the review of unmet need and DOB, will the applicant's unmet needs be met within the program's cap for assistance?	Drop Down Box: YES, NO	NO
5.00	URA Requirements - Tenant Occupancy		
5.01	Is the unit occupied by tenants?	Drop Down Box: YES, NO	YES, FRR
5.02	If yes, has tenant contact and household information been collected as part of the application intake process?	Drop Down Box: YES, NO, N/A, FRR	NO, FRR
5.03	If yes, have all tenants received a General Information Notice?	Drop Down Box: YES, NO, N/A, FRR	NO, FRR
5.04	If yes, record date General Information Notice provided	Manual Entry	Manual Entry
5.05	If yes, Is documentation of receipt uploaded to all tenant files?	Drop Down Box: YES, NO, N/A, FRR	NO, FRR
5.06	If no, list tenants that have not received the GIN:	Manual Entry	Manual Entry
5.07	If yes, has the tenant received a Notice of Non-Displacement?	Drop Down Box: YES, NO, N/A, FRR	YES, FRR
5.08	If yes, record date of all Notice of Non-Displacements	Manual Entry	Manual Entry
5.09	If no, list tenants that have not received the Notice of Non-Displacement	Manual Entry	Manual Entry
6.00	Applicant Prioritization		
6.01	Does the housing program limit assistance to LMI households?	Drop Down Box: YES, NO	N/A
6.02	If yes, is there sufficient documentation and income verification uploaded to the file that the household qualifies as a low-to-moderate income household?	Drop Down Box: YES, NO	NO
6.03	Does the program prioritize assistance to elderly, disabled, and female-headed households for assistance?	Drop Down Box: YES, NO	N/A
6.04	If yes, was assistance to the household prioritized correctly?	Drop Down Box: YES, NO, FRR	NO, FRR
7.00	General Observations Not Documented on the Checklist		
7.01		Manual Entry	
7.02		Manual Entry	
7.03		Manual Entry	
7.04		Manual Entry	
7.05		Manual Entry	
7.06		Manual Entry	
7.07		Manual Entry	
7.08		Manual Entry	
7.09		Manual Entry	
7.10		Manual Entry	

EXHIBIT B: STAGE 2: PRE-CONSTRUCTION CHECKLIST



Exhibit B
Phase II: Pre-Construction Checklist
 City of Columbia CDBG-DR Program

Drop Down Box Options

**Reporting Outcomes
 (Indicators of Failed
 Review)**

0.00 File Review Information			
0.01	Date of review	Date:	N/A
0.02	Initials of Reviewer	Initials:	N/A
0.03	Start time of the review:	Start time:	N/A
0.04	End time of the review:	End time:	N/A
0.05	Total duration (hours: minutes):	Duration:	N/A
1.00 Applicant Information			
1.01	Application ID#		MANUAL ENTRY
1.02	Applicant Name: First:	Last:	MANUAL ENTRY
1.03	Damaged Address:	Street:	MANUAL ENTRY
		Unit or Apartment:	MANUAL ENTRY
		County:	MANUAL ENTRY
		State:	MANUAL ENTRY
		ZIP Code:	MANUAL ENTRY
1.04	Select CDBG-DR Housing Rehabilitation Program Under Review:		Drop Down Options: CHAP, SRRP, ERP, MRP
2.00 Damage Assessment			
2.01	Has a preliminary damage assessment been completed on the applicant's home?		Drop Down: YES, NO
2.02	If yes, has a copy of the damage assessment been uploaded to the applicant's file?		Drop Down: YES, NO
2.03	If yes, does the damage assessment include a list of damages eligible for repair?		Drop Down: YES, NO, FRR
2.04	If yes, does it appear that all damages listed are storm related?		Drop Down: YES, NO, FRR
2.05	Are the line items in the damage assessment consistent with the line items listed in the estimated cost of repair?		Drop Down: YES, NO, FRR
2.06	Was a "Final Allowable Damage Agreement" generated and uploaded to the applicant's file?		Drop Down: YES, NO
2.07	If yes, is the "Final Allowable Damage Agreement" consistent with the Damage Assessment and Estimated Cost of Repair?		Drop Down: YES, NO, FRR
2.08	If yes, is the "Final Allowable Damage Agreement" signed by the applicant?		Drop Down: YES, NO
3.00 Tier II Environmental Review			
3.01	Is a Tier II environmental review uploaded to the applicant's file?		Drop Down: YES, NO
3.02	If yes, is the Tier II for correct property?		Drop Down: YES, NO
3.03	Was the Tier II approved by the Responsible Entity?		Drop Down: YES, NO
3.04	If yes, record the date that the Tier II was approved.		Manual Entry
3.05	If yes, was the Tier II signed prior to the date of the Grant Agreement?		Drop Down: YES, NO
3.06	Does the Tier II clear the property for the type of work included in the Estimated Cost of Repair (i.e. Rehabilitation, Reconstruction, Elevation)?		Drop Down: YES, NO
3.07	Were environmental mitigation measures and special permitting listed in the Tier II clearance?		Drop Down: YES, NO
3.08	Is additional Section 106 review required?		Drop Down: YES, NO
3.09	Is Lead Based Paint (LBP) identified as an issue?		Drop Down: YES, NO
3.10	Is Asbestos identified as an issue?		Drop Down: YES, NO
3.11	Is any special permitting required prior to initiating construction activities?		Drop Down: YES, NO
3.12	Are any other mitigation measures listed that should be incorporated into the Scope of Work for the project?		Drop Down: YES, NO
3.13	If other, list other mitigation measures outlined in the Tier II.		Manual Entry
3.14	Is additional Agency Consultation Required, i.e., SHPO, Indian Tribes, etc.?		Drop Down: YES, NO
3.15	If yes; is proof of consultation and outcome uploaded to the applicant's file?		Drop Down: YES, NO
3.16	Is the property in the floodplain?		Drop Down: YES, NO
3.17	If yes, is there documentation uploaded to the applicant's file that the 8 step process was followed?		Drop Down: YES, NO
3.18	If the applicant's home was built prior to 1978, is there a Lead Based Paint Risk Assessment uploaded to the file?		Drop Down: YES, NO, N/A
3.19	If yes, is a copy of the Risk Assessment uploaded to the applicant's file?		Drop Down: YES, NO
3.20	If yes, does the Risk Assessment include a CURRENT copy of the Risk Assessor's LBP Certification?		Drop Down: YES, NO
3.21	If yes, was the applicant provided a copy of the Risk Assessment?		Drop Down: YES, NO
3.22	If yes, was a signed receipt for the Risk Assessment uploaded to the applicant's file?		Drop Down: YES, NO
3.23	During the initial site visit, was the home identified as having asbestos?		Drop Down: YES, NO
3.24	If yes, were asbestos materials tested and identified for removal?		Drop Down: YES, NO
3.25	If yes, was the asbestos report uploaded to the applicant's file?		Drop Down: YES, NO
3.26	If yes, does the asbestos survey include a CURRENT copy of the worker's Certification?		Drop Down: YES, NO
3.27	If yes, was the applicant provided a copy of the asbestos survey and testing results?		Drop Down: YES, NO
3.28	If yes, was a signed receipt for the asbestos survey uploaded to the applicant's file?		Drop Down: YES, NO
3.29	Are Tier II and Risk Assessment requirements properly incorporated into the Estimated Cost to Repair and Scope of Work?		Drop Down: YES, NO, FRR
3.30	If no, list Tier II and environmental remediation line items that are missing or not properly scoped.		Manual Entry
4.00 Scope of Work			
4.01	Has a Scope of Work been developed for the project bid?		Drop Down: YES, NO
4.02	If yes, is the SOW uploaded to the applicant's file?		Drop Down: YES, NO
4.03	If yes, does the SOW to be bid match the Estimated Cost to Repair and only include eligible line items?		Drop Down: YES, NO
4.04	If yes, does the SOW include all environmental remediation requirements listed in the Tier II clearance, LBP Risk Assessment, asbestos survey, flood resistant building techniques, etc. (as applicable)?		Drop Down: YES, NO
4.05	If yes, is there signed documentation uploaded to the file that the applicant has accepted the SOW to be bid?		Drop Down: YES, NO
5.00 Project Bid			
5.01	Is a copy of the bid solicitation uploaded to the applicant's file?		Drop Down: YES, NO
5.02	Was the uploaded bid package complete?		Drop Down: YES, NO

5.03	If yes, was the Scope of Work included in the bid package consistent with the Estimated Cost to Repair?	Drop Down: YES, NO	NO
5.04	If yes, are all environmental remediation measures and permitting requirements included in the SOW?	Drop Down: YES, NO	NO
5.05	If yes, were the program's rehabilitation standards included in the package (to include Green Building Requirements)?	Drop Down: YES, NO	NO
5.06	If yes, was a bid form included in the bid package?	Drop Down: YES, NO	NO
5.07	Was a mandatory pre-construction conference held?	Drop Down: YES, NO	NO
5.08	If no, is there a reason documented in the file?	Drop Down: YES, NO	NO
5.09	Is the bid tabulation included in the applicant's file?	Drop Down: YES, NO	NO
5.10	If yes, were the three lowest bids offered by responsible contractors submitted to the applicant of review and selection?	Drop Down: YES, NO	NO
5.11	Did the bids fall within plus or minus 10% of the programs cost estimate?	Drop Down: YES, NO	NO
5.12	If no, was a variance analysis performed? Is the variance analysis uploaded to the applicant's file?	Drop Down: YES, NO	NO
6.00	Pre-Qualified Residential Construction Contractor		
6.01	Did the applicant select a bid from a pre-qualified contractor?	Drop Down: YES, NO	NO
6.02	If yes, is the following documentation current and uploaded to the applicant's file?	Drop Down: YES, NO	NO
6.03	Current Debarment Check?	Drop Down: YES, NO	NO
6.04	Current City of Columbia and State of SC licenses as applicable?	Drop Down: YES, NO	NO
6.05	Copies of all required bonding and insurance to complete the applicant's project?	Drop Down: YES, NO	NO
7.00	Final Grant Award Calculation		
7.01	Is the final grant award calculation correct based upon documentation in the applicants file (unmet needs, DOB, and project bid amount)?	Drop Down: YES, NO	NO
7.02	Does the total amount of the DOB match the documentation in the applicant's file?	Drop Down: YES, NO	NO
7.03	Does the amount of the applicant's unmet need exceed the minimum threshold for program assistance (Note: Varies by Program)?	Drop Down: YES, NO, N/A	NO
7.04	Is the grant award at or below the program cap for assistance? (Note: Varies by Program)	Drop Down: YES, NO	NO
8.00	Grant Agreement		
8.01	Is a copy of the applicant's Grant Agreement uploaded to the applicant's file?	Drop Down: YES, NO	NO
8.02	If yes, is the Grant Agreement signed by all parties and properly executed?	Drop Down: YES, NO	NO
8.03	If yes, is the amount of Grant Agreement consistent with the analysis of unmet needs, DOB, and bid amounts?	Drop Down: YES, NO	NO
8.04	If yes, is the approved Scope of Work included as part of the Grant Agreement?	Drop Down: YES, NO	NO
9.00	Subrogation Agreement		
9.01	Is a copy of the Subrogation Agreement uploaded to the applicant's file?	Drop Down: YES, NO	NO
9.02	If yes, is the agreement properly executed and signed by all property owners?	Drop Down: YES, NO	NO
10.00	Covenant on Property		
10.01	Is a copy of the property covenant uploaded to the applicant's file?	Drop Down: YES, NO	NO
10.02	If yes, is the covenant signed by all property owners and properly executed?	Drop Down: YES, NO	NO
10.03	If yes, has the covenant been recorded at the County Clerk's Office?	Drop Down: YES, NO	NO
10.04	If yes, is the recordation information documented in the Applicant's File (for future releases or partial releases)?	Drop Down: YES, NO	NO
11.00	Construction Contract		
11.01	Is a copy of the Construction Contract uploaded to the applicant's file?	Drop Down: YES, NO	NO
11.02	If yes, is the construction contract signed by all parties and properly executed (notarized) ?	Drop Down: YES, NO	NO
11.03	If yes, does the construction contract amount match the amount of the bid and Scope of Work?	Drop Down: YES, NO	NO
11.04	If yes, is the applicant accepted SOW attached to the construction contact as an addendum?	Drop Down: YES, NO	NO
12.00	Notice to Proceed (NTP)		
12.01	Is the NTP uploaded to the applicant's file?	Drop Down: YES, NO	NO
12.02	If yes, was the NTP signed by both the contractor and applicant?	Drop Down: YES, NO	NO
12.03	If yes, does that NTP indicate the construction start and end dates?	Drop Down: YES, NO	NO
12.04	Was the owner given 3 day to rescind the transaction/NTP?	Drop Down: YES, NO	NO
13.00	Temporary Displacement -Tenants		
13.01	Does program related work cause tenants to be temporarily displaced?	Drop Down: YES, NO, N/A	NO
13.02	If yes, have all tenants received and signed a receipt for the <i>General Information Notice (GIN)</i> ?	Drop Down: YES, NO	NO
13.03	If yes, have all tenants received a <i>Notice of Non-Displacement Temporary Relocation Required Notice</i> ?	Drop Down: YES, NO	NO
13.04	If yes, is a copy of the tenant household case record uploaded to the file?	Drop Down: YES, NO	NO
13.05	If yes, has the program provided adequate relocation advisory services?	Drop Down: YES, NO	NO
13.06	If yes, were available decent, safe, and sanitary units referred to the tenants for temporary relocation?	Drop Down: YES, NO	NO
13.07	If yes, were the tenant's provided a 30 Day Move out notice?	Drop Down: YES, NO	NO
13.08	If yes, were tenants provided moving expenses?	Drop Down: YES, NO	NO
13.09	If yes, have all HUD Claim Forms for temporary relocation assistance been completed and uploaded to the applicant's file?	Drop Down: YES, NO	NO
13.10	If yes, is all supporting documentation uploaded with the HUD Claim Forms?	Drop Down: YES, NO	NO
14.00	Temporary Displacement -Applicants (USE ONLY IF AN OPTIONAL RELOCATION POLICY HAS BEEN APPROVED BY THE COC)		
14.01	Was temporary relocation of program applicants necessary in order to complete work on their home?	Drop Down: YES, NO	NO
14.02	If yes, were the applicants advised about the availability of temporary relocation assistance?	Drop Down: YES, NO	NO
14.03	If yes, were the applicants provided a copy of the city's Optional Relocation Policy?	Drop Down: YES, NO	NO
14.04	Did the applicant request temporary relocation assistance?	Drop Down: YES, NO	NO
14.05	If yes, was assistance provided in accordance with the city Optional Relocation Policy?	Drop Down: YES, NO	NO
15.00	General Observations Not Documented on the Checklist		
15.01		Manual Entry	N/A
15.02		Manual Entry	N/A
15.03		Manual Entry	N/A
15.04		Manual Entry	N/A
15.05		Manual Entry	N/A
15.06		Manual Entry	N/A
15.07		Manual Entry	N/A
15.08		Manual Entry	N/A
15.09		Manual Entry	N/A
15.10		Manual Entry	N/A

EXHIBIT C:
STAGE 3: POST-CONSTRUCTION CHECKLIST



Exhibit C
Phase III: Post-Construction Checklist
 City of Columbia CDBG-DR Program

Drop Down Box Options

**Reporting Outcomes
 (Indicators of Failed
 Review)**

0.00 File Review Information			
0.01	Date of review	Date:	N/A
0.02	Initials of Reviewer	Initials:	N/A
0.03	Start time of the review:	Start time:	N/A
0.04	End time of the review:	End time:	N/A
0.05	Total duration (hours: minutes):	Duration:	N/A
1.00 Applicant Information			
1.01	Application ID#		MANUAL ENTRY
1.02	Applicant Name: First:	Last:	MANUAL ENTRY
1.03	Damaged Address:	Street:	MANUAL ENTRY
		Unit or Apartment:	MANUAL ENTRY
		County:	MANUAL ENTRY
		State:	MANUAL ENTRY
		ZIP Code:	MANUAL ENTRY
1.04	Select CDBG-DR Housing Rehabilitation Program Under Review:		Drop Down Options: CHAP, SRRP, ERP, MRP
2.00 Tier II Post-Construction Requirements			
2.01	Were the Tier II requirements and conditions met during the construction process?		Drop Down: YES, NO
2.02	If no, list Tier II requirements not met.		Drop Down: Section 106, LBP, Asbestos, Permitting, Other Mitigation Measures, Multiple
2.03	If the Risk Assessment identified environmental remediation of Lead Based Paint (LBP), was LBP properly scoped and completed during the construction process?		Drop Down: YES, NO, N/A
2.04	If yes, is a copy of the Abatement/Lead Hazard Reduction Report uploaded to the applicant's file?		Drop Down: YES, NO
2.05	If yes, has the owner been provided a copy of the Abatement Report with a signed receipt uploaded to the applicant's file?		Drop Down: YES, NO
2.06	If yes, has a copy of a passing Clearance Report been uploaded to the applicant's file?		Drop Down: YES, NO
2.07	If yes, has the owner been provided a copy of the Clearance Report with a signed receipt uploaded to the applicant's file?		Drop Down: YES, NO
2.08	If yes, was a certified LBP firm used to remediate the LBP?		Drop Down: YES, NO
2.09	If yes, is a copy of the firm's certification current and uploaded to the applicant's file?		Drop Down: YES, NO
2.10	If applicable, was asbestos identified for remediation and scoped as part of the applicant's project?		Drop Down: YES, NO, N/A
2.11	If yes, was an Asbestos Clearance Report uploaded to the applicant's file?		Drop Down: YES, NO
2.12	If yes, has the owner been provided a copy of the Asbestos Clearance Report?		Drop Down: YES, NO
2.13	If yes, is a copy of the Asbestos Waste Manifest uploaded to the applicant's file?		Drop Down: YES, NO
2.14	If yes, was a current copy of the worker's certification uploaded to the applicant's file?		Drop Down: YES, NO
2.15	Does the work completed on the home meet Green Building Standards?		Drop Down: YES, NO
2.16	If yes, is documentation uploaded to the applicant's file demonstrating compliance?		Drop Down: YES, NO
2.17	Did the rehabilitation and reconstruction of the home occur in a Flood Hazard Area?		Drop Down: YES, NO, N/A
2.18	If yes, were flood resistant construction techniques utilized?		Drop Down: YES, NO
2.19	If yes, is documentation uploaded to the applicant's file demonstrating compliance?		Drop Down: YES, NO
2.20	Were other mitigation measures identified in the Tier II Clearance Report?		Drop Down: YES, NO, N/A
2.21	If yes, do the inspection reports show that these measures were completed as prescribed?		Drop Down: YES, NO
3.00 Construction Inspections			
3.01	Are inspections uploaded to document each progress payment for the applicant's project?		Drop Down: YES, NO
3.02	Do inspection reports have photos documenting completion of the work?		Drop Down: YES, NO
3.03	If no, is the reason documented on the inspection report?		Drop Down: YES, NO
3.04	Are all inspection reports signed by the applicant?		Drop Down: YES, NO
3.05	If no, is the reason documented on the inspection report?		Drop Down: YES, NO
3.06	If no, is there documentation in the file that the contractor corrected faulty work?		Drop Down: YES, NO
3.07	Has the contractor passed a final inspection?		Manual Entry
3.08	If yes, is the Final Inspection uploaded into the system and legible?		Drop Down: YES, NO
3.09	If yes, is the Final Inspection for the correct property?		Drop Down: YES, NO
3.10	If yes, does the Final Inspection capture the completion of all line items listed in the Scope of Work?		Drop Down: YES, NO
3.11	If no, indicate which items are not addressed:		Manual Entry
4.00 Permitting			
4.01	If applicable, has the building permit for the project been uploaded to the applicant's file?		Drop Down: YES, NO, N/A
4.02	If applicable, has the Mechanical Permit been uploaded into the applicant's file?		Drop Down: YES, NO, N/A
4.03	If applicable, has the Electrical Permit been uploaded into the applicant's file?		Drop Down: YES, NO, N/A
4.04	If applicable, has the Plumbing Permit been uploaded into the applicant's file?		Drop Down: YES, NO, N/A
4.05	If applicable, has a Final CO, COC, COA uploaded into the applicant's file?		Drop Down: YES, NO, N/A
4.06	Were any additional permits required for the applicant's project?		Drop Down: YES, NO, N/A

4.07	If yes, were these permits uploaded into the applicant's file?	Drop Down: YES, NO, N/A	NO
5.00	Change Orders		
5.01	Did the applicant's project require change orders?	Drop Down: YES, NO	NO
5.02	If yes, are all change order(s) uploaded into the applicant's file?	Drop Down: YES, NO	NO
5.03	If yes, are all change orders approved by the Construction Manager?	Drop Down: YES, NO	NO
5.04	If yes, are all change orders approved by the Applicant?	Drop Down: YES, NO	NO
5.05	If yes, are all change orders approved by the Contractor?	Drop Down: YES, NO	NO
5.06	Is each change order supported by a cost reasonableness analysis consisting of 1) the reason the change is necessary, 2) type and scope of the work needed with documentation as necessary, 3) estimated cost, and 4) estimated number of days to complete.	Drop Down: YES, NO	NO
5.07	Are the dollar amounts of all change orders input into the system of record in order to calculate an applicant's final grant award?	Drop Down: YES, NO	NO
5.08	If yes, is the applicant's final project cost less than the program cap?	Drop Down: YES, NO	NO
6.00	Warranty		
6.01	Was the applicant notified in writing of their one-year warranty period?	Drop Down: YES, NO	NO
6.02	If yes, was the notification uploaded into the applicant's file?	Drop Down: YES, NO	NO
7.00	URA		
7.01	Was the length of the temporary displacement for tenants less than 12 months?	Drop Down: YES, NO	NO
7.02	If no, were permanent relocation benefits offered to the tenants?	Drop Down: YES, NO	NO
7.03	If yes, did tenants return to the applicant's unit once construction was complete?	Drop Down: YES, NO	NO
7.04	If yes, is a copy of the post relocation lease uploaded to the file?	Drop Down: YES, NO	NO
7.05	If yes, is the amount of the post relocation lease consistent with the pre-relocation lease?	Drop Down: YES, NO	NO
8.00	General Observations Not Documented on the Checklist		
8.01		Manual Entry	N/A
8.02		Manual Entry	N/A
8.03		Manual Entry	N/A
8.04		Manual Entry	N/A
8.05		Manual Entry	N/A
8.06		Manual Entry	N/A
8.07		Manual Entry	N/A
8.08		Manual Entry	N/A
8.09		Manual Entry	N/A
8.10		Manual Entry	N/A

**EXHIBIT D:
STAGE 4: CLOSEOUT CHECKLIST**



Exhibit D
Phase IV: Closeout Checklist
 City of Columbia CDBG-DR Program

Drop Down Box Options

Reporting Outcomes
(Indicators of Failed Review)

0.00 File Review Information			
0.01	Date of review	Date:	N/A
0.02	Initials of Reviewer	Initials:	N/A
0.03	Start time of the review:	Start time:	N/A
0.04	End time of the review:	End time:	N/A
0.05	Total duration (hours: minutes):	Duration:	N/A
1.00 Applicant Information			
1.01	Application ID#		MANUAL ENTRY
1.02	Applicant Name: First:	Last:	MANUAL ENTRY
1.03	Damaged Address:	Street:	MANUAL ENTRY
		Unit or Apartment:	MANUAL ENTRY
		County:	MANUAL ENTRY
		State:	MANUAL ENTRY
		ZIP Code:	MANUAL ENTRY
1.04	Select CDBG-DR Housing Rehabilitation Program Under Review:		Drop Down Options: CHAP, SRRP, ERP, MRP
2.00 Final Inspection and Acceptance of Work			
2.01	Has the Contractor Passed a Final Inspection?		Drop Down Box: YES, NO
2.02	Was the Final Inspection Report generated and submitted to the City of Columbia's System of Record?		Drop Down Box: YES, NO
2.03	Have all Final Inspection Photos been uploaded to the City of Columbia's System of Record?		Drop Down Box: YES, NO
2.04	Is a Final Acceptance of Work uploaded to the file?		Drop Down Box: YES, NO
2.05	If yes, is the Final Acceptance Form signed by the City?		Drop Down Box: YES, NO
2.06	If yes, if the Final Acceptance Form signed by the Applicant?		Drop Down Box: YES, NO
2.07	Did the applicant received all warranties and instructions for installed equipment?		Drop Down Box: YES, NO
3.00 Warranty			
3.01	List date of one year Warranty Expiration:		Manual Entry
3.02	Has the one-year warranty expired?		Drop Down Box: YES, NO
3.03	Was the applicant notified in writing regarding the expiration of the warranty period 6 months prior to its expiration?		Drop Down Box: YES, NO
3.04	If yes, is a copy of the warranty letter uploaded to the applicant's file?		Drop Down Box: YES, NO
3.05	Did the applicant request any repairs during the warranty period?		Drop Down Box: YES, NO
3.06	If yes, were the repairs completed?		Drop Down Box: YES, NO
3.07	If yes, is there an inspection report uploaded to the file demonstrating that the repairs were completed?		Drop Down Box: YES, NO
4.00 Payment and Reconciliation			
4.01	Have all contractor requests for payment been uploaded to the applicant's file with supporting documentation?		Drop Down Box: YES, NO
4.02	If yes, were inspection reports documenting completed work uploaded to the file prior to the issuance of the payment.		Drop Down Box: YES, NO
4.03	Has a Final Payment request been made by the contractor?		Drop Down Box: YES, NO
4.04	If yes, was all supporting documentation included with the contractor's request for payment (invoices, inspection and clearance reports, etc.)?		Drop Down Box: YES, NO
4.05	If yes, is the Final Payment request complete and consistent with the contract amount and change orders?		Drop Down Box: YES, NO
4.06	If yes, has the Final Payment been issued to the contractor?		Drop Down Box: YES, NO
4.07	Was 10% retainage held until 1) the final inspection was approved, and 2) all mechanics and material liens have been released and uploaded to the applicant's file?		Drop Down Box: YES, NO
4.08	If yes, are all mechanics and material liens uploaded to the applicant's file?		Drop Down Box: YES, NO
4.09	Has retainage been disbursed to the contractor?		Drop Down Box: YES, NO
4.10	Have all project costs been reconciled and documented in the applicant's file?		Drop Down Box: YES, NO
4.11	If yes, is the applicant's final award amount less than the programs cap?		Drop Down Box: YES, NO
5.00 URA-Temporary Relocation of Tenants			
5.01	Were tenants temporarily displaced by the applicant's project?		Drop Down: YES, NO
5.02	Was the length of the temporary displacement less than 12 months?		Drop Down: YES, NO
5.03	If no, were permanent relocation benefits offered to the tenants?		Drop Down: YES, NO
5.04	If yes, did tenants return to the applicant's unit once construction was complete?		Drop Down: YES, NO
5.05	If yes, is a copy of the post relocation lease uploaded to the file?		Drop Down: YES, NO
5.06	If yes, is the amount of the post relocation lease consistent with the pre-relocation lease?		Drop Down: YES, NO
5.07	Did any tenants become permanently displaced as a result of the applicant's project?		Drop Down: YES, NO
5.08	If yes, was a <i>Notice of Eligibility for Relocation Benefits</i> issued to the tenant?		Drop Down: YES, NO
5.09	If yes, is there a signed receipt for the Notice uploaded to the applicant's file?		Drop Down: YES, NO
5.10	If yes, were permanent relocation benefits paid to the tenants in accordance with URA requirements?		Drop Down: YES, NO
5.11	Will tenant income be used to document LMI benefit for the applicant's project?		Drop Down Box: YES, NO
5.12	If yes, what are the number of units that will be counted toward LMI benefits?		Manual Entry
5.13	If yes, has tenant income information submitted to the program for all units to be counted towards LMI after re-occupancy?		Drop Down Box: YES, NO

5.14	If yes, is the correct income range and year used to make the LMI determination?	Drop Down Box: YES, NO	NO
5.15	If yes, has all tenant demographic information been collected for DRGR reporting after re-occupancy for all units?	Drop Down Box: YES, NO	NO
6.00	Applicant Reimbursement		
6.01	Was reimbursement requested by the applicant?	Drop Down Box: YES, NO	N/A
6.02	If yes, did the applicant provide documentation related to a financial hardship?	Drop Down Box: YES, NO	NO
6.03	If yes, did the reimbursement request meet the minimum threshold of \$5,000?	Drop Down Box: YES, NO	NO
6.04	If yes, was the reimbursement request less than the maximum threshold of \$10,000?	Drop Down Box: YES, NO	NO
6.05	If yes, were detailed receipts provided by the applicant?	Drop Down Box: YES, NO	NO
6.06	If yes, do receipts correspond with the list and dollar amount of the repairs to be reimbursed?	Drop Down Box: YES, NO	NO
6.07	Were the permanent repairs to be reimbursed completed prior to October 4, 2016?	Drop Down Box: YES, NO	NO
6.08	If yes, was documentation regarding the date of completion uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
6.09	If no, was reimbursement of the expense denied by the program?	Drop Down Box: YES, NO	NO
6.10	Were the permanent repairs to be reimbursed directly related to the impact of the flood?	Drop Down Box: YES, NO	NO
6.11	If yes, was this documentation evidenced by the initial site inspection?	Drop Down Box: YES, NO	NO
6.12	If no, was reimbursement of the expense denied by the program?	Drop Down Box: YES, NO	NO
6.13	Did the initial site inspection identify any deficiencies related to Decent, Safe, Sanitary conditions?	Drop Down Box: YES, NO	NO
6.14	If yes, was the reimbursement denied?	Drop Down Box: YES, NO	NO
6.15	If no, is there documentation in the files that an exception has been granted?	Drop Down Box: YES, NO	NO
6.16	Were any lead-based paint hazards identified during the LBP Risk Assessment?	Drop Down Box: YES, NO	NO
6.17	If yes, were all lead hazards remediated and cleared prior to issuing the reimbursement to the applicant?	Drop Down Box: YES, NO	NO
6.18	If no, is there documentation in the files that an exception has been granted?	Drop Down Box: YES, NO	NO
6.19	If reimbursement was approved, was a DOB analysis (to include an assessment of non-profit or donated assistance) conducted prior to issuing the reimbursement?	Drop Down Box: YES, NO	NO
6.20	If reimbursement was approved, was a program estimate of the value of repairs based upon a standardized pricing model conducted and uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
6.21	Were costs necessary and reasonable based upon the standardized pricing model?	Drop Down Box: YES, NO	NO
7.00	Applicant Compliance		
7.01	Is the applicant currently compliant with program requirements?	Drop Down Box: YES, NO	NO
7.02	If yes, is all compliance documentation uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
7.03	If no, list reasons for non-compliance.	Manual Entry	N/A
7.04	Has the applicant provided proof of flood insurance for one year beyond the closeout date?	Drop Down Box: YES, NO	NO
7.05	If yes, is the current declaration page uploaded to the applicant's file?	Drop Down Box: YES, NO	NO
7.06	Have all outstanding appeals, disputes, or grievances been resolved?	Drop Down Box: YES, NO	NO
7.07	If yes, is the appeal or grievance documented in the City of Columbia's System of Record?	Drop Down Box: YES, NO	NO
7.08	If yes, is the city's response documented in writing?	Drop Down Box: YES, NO	NO
7.09	If applicable, has the applicant received full payment for their reimbursement request?	Drop Down Box: YES, NO	NO
7.10	If applicable, have all negative variances (or repayment issues) been resolved?	Drop Down Box: YES, NO	NO
8.00	General Observations Not Documented on the Checklist		
8.01		Manual Entry	N/A
8.02		Manual Entry	N/A
8.03		Manual Entry	N/A
8.04		Manual Entry	N/A
8.05		Manual Entry	N/A
8.06		Manual Entry	N/A
8.07		Manual Entry	N/A
8.08		Manual Entry	N/A
8.09		Manual Entry	N/A
8.10		Manual Entry	N/A