

Guide for Review of Financial Management and Audits			
Name of Recipient:			
Name of Subrecipient (if applicable):			
Name of Program(s) Monitored:			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the recipient's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "finding."

**Instructions:** This Exhibit is designed to monitor a non-Federal entity's compliance with requirements in Subparts D and F of 2 CFR part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, except for Cost Allowability, Procurement, and Equipment, which are covered in other Exhibits in this Chapter.

**Applicability.** This Exhibit applies to the following programs:

- Community Development Block Grant (CDBG) Entitlement, Small Cities, Non-Entitlement CDBG Grants in Hawaii, and Insular Areas Programs;
- State CDBG Program (Only Section K, *Audit Requirements*, is directly applicable to State CDBG grantees. Sections A through J of this Exhibit are not applicable to State CDBG grantees, unless the grantee has chosen to apply this portion of 2 CFR part 200 to satisfy the requirement for fiscal controls and accounting procedures pursuant to 24 CFR 570.489(d));
- Section 108 Loan Guarantee Program (follows the CDBG program regulations);
- Disaster Recovery CDBG Supplemental Grants (follows the CDBG program regulations);
- HOME Investment Partnerships Program (HOME);
- Housing Opportunities for Persons With AIDS (HOPWA);
- Emergency Solutions Grants (ESG) Program;
- Continuum of Care (CoC) Program (grants awarded in the FY 2015 competition and later);
- Appalachia Economic Development Initiative (AEDI);
- Border Community Capital Initiative (BCCI);
- Delta Community Capital Initiative (DCCI);
- Self-Help Homeownership Opportunity Program (SHOP);
- Rural Capacity Building for Community Development and Affordable Housing (RCB); and
- Capacity Building for Community Development and Affordable Housing (Section 4).

**Effective Date:** To ensure that the requirements are correctly applied, HUD reviewers will need to review Notice CPD-16-04 at (<http://portal.hud.gov/hudportal/documents/huddoc?id=16-04cpdn.pdf>). It is possible that reviewers will need to use both this Exhibit and a program-specific Financial Management Exhibit simultaneously if funds being monitored are covered

under pre- and post-2 CFR part 200 requirements. Program-specific exceptions to the Uniform Requirements are not included in this Exhibit but are retained in each program Chapter; therefore, HUD reviewers will also need to review program-specific Financial Management Exhibits to determine if their use is needed to ensure a complete review. Questions in this Exhibit that don't apply to one of the programs listed in the *Applicability* section above (pursuant to HUD's conforming rule or governing NOFA) will have that exception noted above the question.

Program Citations: In addition to the citations for 2 CFR part 200, program-specific citations are included either on a question-by-question basis, or in a single reference, as noted below, depending on how the Uniform Requirements apply.

- Appalachia Economic Development Initiative (AEDI): All questions apply pursuant to the FY 2014 AEDI Notice of Funding Availability (NOFA) and Grant Agreement, Article I.G.
- Border Community Capital Initiative (BCCI): All questions apply pursuant to the FY 2013 NOFA and Grant Agreement, Article I.E.
- Delta Community Capital Initiative (DCCI): All questions apply pursuant to the FY DCCI 2014 NOFA and Grant Agreement, Article I.F.6.
- Self-Help Homeownership Opportunity Program (SHOP): All questions apply pursuant to the FY 2014 SHOP NOFA and SHOP Grant Agreement, Article XVIII, B, C.
- Rural Capacity Building for Community Development and Affordable Housing (RCB): All questions apply pursuant to the NOFA, Section VI.B.4.
- Capacity Building for Community Development and Affordable Housing (Section 4): All questions apply pursuant to the NOFA, Section VI.B.4.

A Note on Findings: HUD reviewers need to ensure that, if deficiencies are identified, the monitoring Finding cites to both the relevant provision in 2 CFR part 200 and the program regulation/NOFA/Grant Agreement citation that incorporates the requirements (e.g., 24 CFR 92.505, or 24 CFR 570.502). However, as described in Section 4.b of Notice CPD-16-04, HUD reviewers will not make findings of noncompliance with the Uniform Requirements (i.e., the part 200 requirements) if a grantee used CDBG, CDBG-DR, ESG, or HOME funds in accordance with comparable requirements under parts 84 or 85 (2013 edition) between December 26, 2014 and January 6, 2016.

Terminology: Note that the terminology used to reference the entities receiving the Federal awards mirrors the language in 2 CFR part 200 and uses "recipient" to mean the entity that directly received the Federal funds, e.g., program participant, Participating Jurisdiction, or grantee, and "subrecipient" to mean the entity that receives funds through a pass-through entity (see §§200.74, 200.86, and 200.93). The definition of "subrecipient" for certain programs, e.g., the CDBG and HOME programs, differs from the part 200 definitions. The reviewer must use the program definition, if it is different. Certain program regulations may also use other terms, such as "State recipient," that are included within the meaning of the term "subrecipient." Where the question pertains to both a recipient and a subrecipient, the term "non-Federal entity" is used (see §200.69).

**Exhibit Structure:** The Exhibit is divided into 11 sections: Financial Management; Internal Controls; Bonds; Payment and Financial Reporting; Improper Payments; Cost Sharing or Matching; Program Income; Revision of Budget and Program Plans; Period of Performance; Record Retention and Access; and Audit Requirements.

**Questions:**

**A. FINANCIAL MANAGEMENT**

1.

<p>Do the non-Federal entity's accounting records identify HUD programs and awards received and expended by specifying, as applicable, the Catalog of Federal Domestic Assistance (CFDA) title and number, HUD award identification number and year, HUD's agency name (as the awarding agency), and name of the pass-through entity, if any? (This requirement will most likely be addressed in the chart of accounts.) [2 CFR 200.302(b)(1); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.450; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(a)(15) (for grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

2.

<p>The non-Federal entity's accounting records must identify adequately the source and application of funds for HUD-funded activities. The non-Federal entity can facilitate compliance with this requirement if it accounts for a HUD program in a separate accounting fund (e.g., Special Revenue Fund). <b>Note</b>, however, that HUD <b>cannot</b> impose specific accounting requirements (such as requiring the non-Federal entity to utilize an accrual basis of accounting).</p>	
<p>a. Do the non-Federal entity's accounting records contain information on HUD grant awards, authorizations, obligations, unobligated balances, assets, expenditures, program income, and interest? [2 CFR 200.302(b)(3); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.450; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e), 24 CFR 578.103(a)(15) (for grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	
<p>b. Does the non-Federal entity maintain adequate source documentation? To determine compliance, select a sample of accounting entries and determine whether they are supported by invoices, contracts, or purchase orders, etc. (Describe sample in response below.) [2 CFR 200.302(b)(3); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.450; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(a)(15) (for</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>

grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]	
<b>Describe Basis for Conclusion:</b>	
<p>c. Does the non-Federal entity's financial management system provide for comparison of expenditures with budget amounts for each HUD award?  <b>NOTE:</b> Governmental entities will usually demonstrate compliance with this requirement by making entries in its accounting records of the amounts budgeted/allocated for activities to be undertaken with the assistance provided under the HUD award which in turn facilitates preparation of financial statements that provide for such comparison.)  [2 CFR 200.302(b)(5); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	
<p>d. Does the non-Federal entity enter in its accounting records an encumbrance/obligation when contracts are executed, purchase orders issued, etc.?  <b>NOTE:</b> Non-Federal entities may use the term "encumbrance" in lieu of "obligation" in its accounting records.  [2 CFR 200.302(b)(3); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(a)(15) (for grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	
<p>e. Does the non-Federal entity identify expenditures in its accounting records according to eligible activity classifications specified in the statute, regulations, or grant agreement that clearly identify the use of program funds for eligible activities?  [2 CFR 200.302(b)(3); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.300(b); ESG: 24 CFR 576.407(c) and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(a)(15) (for grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	
<p>f. Does the information on obligations, expenditures, and program income submitted to HUD in the Consolidated Performance and Evaluation Report (CAPER), or other applicable report(s), reconcile with the non-Federal entity's accounting records for the time period reviewed?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>

<p><b>NOTE:</b> If the non-Federal entity maintains its records on other than an accrual basis, it must be able to support accrual data for its reports on the basis of the documentation on hand. [2 CFR 200.302(b)(2); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 91.520; 24 CFR 574.450; 24 CFR 574.520; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	
<b>Describe Basis for Conclusion:</b>	

3.

<p>Does the non-Federal entity maintain adequate control over all funds, property, and other assets to ensure they are used solely for authorized purposes? See questions below that are related to internal controls. [2 CFR 200.302(b)(4); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578 Subpart D; 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	

**B. INTERNAL CONTROLS**

The non-Federal entity must establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States (known as the "Green Book") or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The definitions of internal control in these documents are intentionally broad. The evaluation of the effectiveness of the non-Federal entity's internal control system likewise must cover a broad range of considerations. Many of the considerations addressed in the review are covered by questions in other monitoring Exhibits (e.g., exhibits on procurement, cost principles, and specific programs). Further, the audit requirements in Subpart F of part 200 include procedures to evaluate the auditee's internal control system. Therefore, the questions below are limited to those areas not specifically addressed elsewhere. However, if other monitoring reviews disclose frequent violations of applicable requirements, or an audit is not required to be performed under Subpart F, the HUD reviewer should take these considerations into account, together with the questions below, in making an overall assessment of the adequacy of the recipient's internal controls.

4.

<p>a. Has the non-Federal entity performed a self-assessment of its internal control system? [2 CFR 200.303(a); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	

<p>b. Does the non-Federal entity take reasonable measures to safeguard protected personally identifiable information (PII) and other information that HUD or a pass-through entity designates as sensitive, or the recipient considers sensitive, consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality? Check to see whether the non-Federal entity has a written policy on protecting PII and other information. [2 CFR 200.303(e); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.440; 24 CFR 574.605; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(x); CoC: 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>c. Does the non-Federal entity have an organization chart that sets forth the actual lines of responsibility for HUD awards?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>d. Are duties and responsibilities segregated (to the extent practicable) so that no one individual has complete authority over a financial transaction? For example, do the non-Federal entity's procedures preclude one person from issuing purchase orders, receiving merchandise, and approving payment vouchers?</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

**C. BONDS**

**5. QUESTIONS NOT APPLICABLE TO THE ESG OR COC PROGRAMS.**

<p>a. Where HUD has included a provision on bonding within an award agreement, has the non-Federal entity obtained fidelity bond coverage for responsible officials? (If no provision on bonding has been included, mark "N/A" and note below.) [2 CFR 200.304(b); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
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<p><b>Describe Basis for Conclusion:</b></p>	
<p>b. If a bond has been obtained, was the bond obtained from a company holding a certificate of authority as an acceptable surety, as prescribed in 31 CFR Part 223, <i>Surety Companies Doing Business with the United States</i>? [2 CFR 200.304(c); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

**D. PAYMENT AND FINANCIAL REPORTING**

**6. QUESTION NOT APPLICABLE TO THE CDBG ENTITLEMENT PROGRAM OR TO THE HOME PROGRAM.**

<p>a. If the recipient is a state, payments under awards that are not governed by a Treasury-State Cash Management Improvement Act (CMIA) agreement, or are not otherwise covered by subpart A of 31 CFR Part 205, must comply with subpart B of that part. If the HUD award is subject to subpart B, are the timing and amount of funds transfers as close as is administratively feasible to the state's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs? [2 CFR 200.305(a); 31 CFR 205.33(a); HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

**QUESTION NOT APPLICABLE TO THE CDBG ENTITLEMENT PROGRAM OR TO THE HOME PROGRAM.**

<p>b. If the state transfers grant funds to subrecipients under a HUD award that is subject to subpart B, does the state have procedures to minimize the time elapsing between the receipt of funds from the Federal government and the transfer of funds to the subrecipients? [2 CFR 200.305(a); 31 CFR 205.33(a); HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

**7. QUESTION NOT APPLICABLE TO THE HOME PROGRAM.**

<p>a. If the recipient is not a state and transfers grant funds to subrecipients, does the recipient have procedures to minimize the time elapsing between the receipt of funds from the Federal government and the transfer of funds to the subrecipients? [2 CFR 200.305(b); CDBG Entitlement: 24 CFR 570.502(a); HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

**QUESTION NOT APPLICABLE TO THE HOME PROGRAM OR TO THE CDBG PROGRAM FOR LUMP SUM DRAWDOWNS PURSUANT TO 24 CFR 570.513.\***

<p>b. If the non-Federal entity is not a state, and requests funds in advance, does it minimize the time elapsing between the transfer of funds from the U.S. Treasury (or pass-through entity) and disbursement by the non-Federal entity for direct program or project costs and the proportionate share of any allowable indirect costs; and are the advance payments limited to the minimum amounts needed and timed to be in accordance with the actual, immediate cash requirements of the non-Federal entity</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
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<p>in carrying out the purpose of the approved project or program?  <b>NOTE:</b> The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the non-Federal entity.                  [2 CFR 200.305(b)(1); CDBG Entitlement: 24 CFR 570.502(a)*; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	
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**Describe Basis for Conclusion:**

QUESTION NOT APPLICABLE TO THE HOME PROGRAM OR TO THE CDBG PROGRAM FOR LUMP SUM DRAWDOWNS PURSUANT TO 24 CFR 570.513.

<p>c. If the recipient held cash advances in excess of three business days, including cash advances provided to subrecipients, has the recipient provided sufficient justification?  <b>NOTE:</b> Holding cash advances for a period longer than three business days is not a violation <i>per se</i>; it is a preliminary screening measure to determine whether further explanation is required.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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**Describe Basis for Conclusion:**

8. QUESTION NOT APPLICABLE TO THE HOME PROGRAM.

<p>a. Does the non-Federal entity disburse funds available from program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments?                  [2 CFR 200.305(b)(5); CDBG Entitlement: 24 CFR 570.502(a); HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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**Describe Basis for Conclusion:**

<p>b. Are advance payments of HUD funds deposited and maintained in insured accounts whenever possible?                  [2 CFR 200.305(b)(7)(ii); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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**Describe Basis for Conclusion:**

<p>c. If the non-Federal entity receives grant advances, does it maintain the advance payments in an interest-bearing account or meet one of the following exceptions?                  (i) The non-Federal entity receives less than \$120,000 in Federal awards per year.</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
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<p>(ii) The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances.</p> <p>(iii) The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.</p> <p>[2 CFR 200.305(b)(8); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

9. QUESTION NOT APPLICABLE TO THE CDBG PROGRAM FOR LUMP SUM  
DRAWDOWNS PURSUANT TO 24 CFR 570.513.\*

<p>If grant advances are deposited into an interest-bearing account, have provisions been made for remitting interest income in excess of \$500 annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either the Automated Clearing House (ACH) network or a Fedwire Funds Service payment?</p> <p>[2 CFR 200.305(b)(9); CDBG Entitlement: 24 CFR 570.502(a)*; HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

E. IMPROPER PAYMENTS

10.

<p>a. Does a review of program expenditures show that no improper payments were made? (Results from other Exhibits can be included here.)</p> <p><b>NOTE:</b> Improper payments means any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements and includes payment to an ineligible party, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by law), any payment that does not account for credit for applicable discounts, and any payment where insufficient or lack of documentation prevents a reviewer from discerning whether a payment was proper.</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. If the non-Federal entity discovered that improper payments were made, did the non-Federal entity take appropriate corrective action(s)? [2 CFR 200.302(b)(4) and 2 CFR 200.303(d); CDBG Entitlement: 24 CFR 570.502(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

**F. COST SHARING OR MATCHING.**

**NOTE:** This section does not apply to the CDBG Program (pursuant to 24 CFR 570.502(a)) or to the HOME, HOPWA and ESG Programs.

11.

<p>Do contributions meet cost sharing or matching requirements (if required under a HUD program), including cash and third party in-kind contributions, meet all of the following criteria:</p> <ul style="list-style-type: none"> <li>a. Are verifiable from the non-Federal entity's records;</li> <li>b. Are not included as contributions for any other Federal award;</li> <li>c. Are necessary and reasonable for accomplishment of project or program objectives;</li> <li>d. Are allowable under Subpart E—Cost Principles;</li> <li>e. Are not paid by the Federal Government under another Federal award, except as authorized by Federal statute;</li> <li>f. Are provided for in the approved budget when required by HUD; and</li> <li>g. Conform to other provisions of 2 CFR part 200, as applicable?</li> </ul> <p><b>NOTE:</b> Criterion (e) above does not apply to the CoC Program. [2 CFR 200.306(b); CoC: 24 CFR 578.73, 24 CFR 578.99(e)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

12.

<p>If unrecovered indirect costs (i.e., the difference between the amount charged to the HUD award and the amount which could have been charged to the HUD award under the recipient's approved negotiated indirect cost rate) are included as a contribution for cost sharing or matching purposes, did the recipient receive prior HUD approval of such inclusion? [2 CFR 200.306(c); CoC: 24 CFR 578.73, 24 CFR 578.99(e)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

13.

If applicable, are non-cash contributions valued in accordance with the requirements at 2 CFR 200.306(d) through (j)? [2 CFR 200.306(d)-(j); CoC: 24 CFR 578.73 and 578.99(e)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

G. PROGRAM INCOME

14.

If revenue-generating activities are being undertaken (e.g., rehabilitation loans, economic development loans), has the non-Federal entity established revenue accounts in its accounting records to record program income? [2 CFR 200.302(b)(3); CDBG Entitlement: 24 CFR 570.504(a); HOME: 2 CFR 92.505; HOPWA: 24 CFR 574.450; 24 CFR 574.605; ESG: 24 CFR 576.407(c); and 24 CFR 576.500(u); CoC: 24 CFR 578.99(e), 24 CFR 578.103(a)(15) (for grants awarded under the FY 2015 NOFA) or 578.103(a)(16) (for grants awarded under the FY 2016 NOFA or later)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

15.

a. Does the non-Federal entity have a system for tracking program income generated by subrecipients? [2 CFR 200.302(b)(4); CDBG Entitlement: 24 CFR 570.504(a); HOME: 2 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

b. If program income is retained by the subrecipient, does the non-Federal entity have a system for ensuring that such income is reported in a timely and accurate manner? [2 CFR 200.302(b)(2); CDBG Entitlement: 24 CFR 570.504; HOME: 2 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

c. Upon expiration of any agreements between the non-Federal entity and its subrecipients, does the non-Federal entity have a system for ensuring: <ul style="list-style-type: none"> <li>i. the timely transfer of any funds required to be returned to the non-Federal entity; and/or</li> <li>ii. the timely transfer of outstanding loans or accounts receivable?</li> </ul> [2 CFR 200.302(b)(4); CDBG Entitlement: 24 CFR 570.504(c); HOME: 2 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<b>Describe Basis for Conclusion:</b>	

16.

<p>Does the recipient comply with the requirements governing the reporting on receipt and use of program income in the Integrated Disbursements and Information System or SF-425, as applicable? [2 CFR 200.302(b)(2); CDBG Entitlement: 24 CFR 570.504(a); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.450; 24 CFR 574.605; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(aa); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(e)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

H. REVISION OF BUDGET AND PROGRAM PLANS. (Complete only if the HUD award is required to comply with the requirements at 2 CFR 200.308.)

17. QUESTION NOT APPLICABLE TO THE CDBG PROGRAM PURSUANT TO 24 CFR 570.502(a)(4) OR TO THE HOME OR ESG PROGRAMS.

<p>a. Have any changes to the approved project’s budget, scope, or objectives been identified?</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							

<p>b. If the recipient made one or more of the following changes with respect to a non-construction award, did the recipient obtain prior approval from HUD for those changes?</p> <ul style="list-style-type: none"> <li>i. Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).</li> <li>ii. Change in a key person specified in the application or the Federal award.</li> <li>iii. The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.</li> <li>iv. The inclusion, unless waived by HUD, of costs that require prior approval in accordance with Subpart E—Cost Principles of this part, or 45 CFR part 75 Appendix IX, <i>Principles for Determining Costs Applicable to Research and Development under Awards and Contracts with Hospitals</i>, or 48 CFR part 31, <i>Contract Cost Principles and Procedures</i>, as applicable.</li> <li>v. The transfer of funds budgeted for participant support costs as defined in §200.75, <i>Participant support costs</i>, to other categories of expense.</li> <li>vi. Unless described in the application and funded in the approved Federal awards, the subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in §200.332, <i>Fixed amount subawards</i> (this provision does not apply to the acquisition of supplies, material, equipment or general support services).</li> </ul>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					

<p>vii. Changes in the approved cost sharing or matching provided by the non-Federal entity.</p> <p>viii. The need arises for additional Federal funds to complete the project. [2 CFR 200.308(c)(1); HOPWA: 24 CFR 574.605; CoC: 24 CFR 578.99(e); and 24 CFR 578.105]</p>	
<b>Describe Basis for Conclusion:</b>	

18. QUESTION NOT APPLICABLE TO THE CDBG PROGRAM PURSUANT TO 24 CFR 570.502(a)(4) OR TO THE HOME AND ESG PROGRAMS.

<p>For HUD awards for construction, has the recipient requested prior approval from HUD for budget revisions whenever (a), (b), or (c) below applies?</p> <p>a. The revision results from changes in the scope or the objective of the project or program.</p> <p>b. The need arises for additional Federal funds to complete the project.</p> <p>c. A revision is desired which involves specific costs for which prior written approval requirements may be imposed consistent with applicable OMB cost principles listed in Subpart E—Cost Principles. [2 CFR 200.308(g); HOPWA: 24 CFR 574.605; CoC: 24 CFR 578.99(e) and 24 CFR 578.105]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No N/A</p>
<b>Describe Basis for Conclusion:</b>	

I. PERIOD OF PERFORMANCE

19.

<p>Has the recipient charged to the HUD award only allowable costs (except as described in §200.461, <i>Publication and printing costs</i>) incurred during the period of performance and authorized pre-award costs? [2 CFR 200.309; CDBG Entitlement: 24 CFR 570.200(a); HOME: 24 CFR 92.505; HOPWA: Units of local government – 24 CFR 91.220; States: 24 CFR 91.320; Competitive: 24 CFR 574.240; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No N/A</p>
<b>Describe Basis for Conclusion:</b>	

J. RECORD RETENTION AND ACCESS

20.

<p><b>For programs covered by the record retention requirements of 2 CFR part 200</b>, does the non-Federal entity comply with the record retention and access requirements of §§200.333, 200.336, and the program-specific record retention requirements? <b>NOTE:</b> The requirements of 2 CFR 200.333 are not applicable to the HOME or HOPWA Programs. [2 CFR 200.333 and 2 CFR 200.336; CDBG Entitlement: 24 CFR 570.502(a)(7); ESG: 24 CFR 576.407(c) and 24 CFR 576.500(y); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(c) and (d)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>Yes No N/A</p>
<b>Describe Basis for Conclusion:</b>	

**K. AUDIT REQUIREMENTS**

**Instructions:** A recipient that expends \$750,000 or more in Federal awards during the recipient’s fiscal year must have a single or program-specific audit conducted for that year in accordance with the provisions of Subpart F, *Audit Requirements*. Recipients that provide Federal awards to subrecipients are referred to as “pass-through entities.” A subrecipient must also have a single or program-specific audit if it meets the \$750,000 expenditure threshold. Pass-through entities are required by 2 CFR 200.331 to ensure compliance with Subpart F. A recipient that expends less than \$750,000 in Federal awards during the entity’s fiscal year is exempt from audit requirements for that year, except as noted in 2 CFR 200.503. This section of questions is designed to assist the HUD reviewer in determining whether the recipient is in compliance with the required elements of an audits management system.

21.

Does the recipient (or any of its subrecipients) meet the annual expenditure threshold (\$750,000) for having a single or program-specific audit conducted? If “no,” skip questions 22 through 27.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Describe Basis for Conclusion:</b>	

22.

a. Did the auditee procure or arrange for the audit services in accordance with the procurement standards at 2 CFR 200.317 – 200.326? [2 CFR 200.508(a) and 2 CFR 200.509; CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c) and 24 CFR 576.500(y); CoC: 24 CFR 578.99(e) and 24 CFR 578.103(c) and (d)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Describe Basis for Conclusion:</b>	

b. Did the request for proposal for audit services clearly state the objectives and scope of the audit and request a copy of the audit organization's peer review report which the auditor is required to provide under Generally Accepted Government Auditing Standards (GAGAS)? [2 CFR 200.509(a); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<b>Describe Basis for Conclusion:</b>	

<p>c. Did the factors to be considered in evaluating the proposal for audit services include the responsiveness to the request for proposal, relevant experience, availability of staff with professional qualifications and technical abilities, the results of peer and external quality control reviews, and price? [2 CFR 200.509(a); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>d. Did the auditee make positive efforts to utilize small businesses, minority-owned firms, and women's business enterprises, in procuring audit services as stated in §200.321, <i>Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms</i>? [2 CFR 200.509(a); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

23.

<p>Did the auditee prepare financial statements, including the schedule of expenditures of Federal awards, required by 2 CFR 200.510? [2 CFR 200.508(b); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

24.

<p>Did the auditee promptly follow up and take corrective action on audit findings, including preparation of a summary schedule of prior audit findings and a corrective action plan in accordance with 2 CFR 200.511(b) and 2 CFR 200.511(c), respectively? [2 CFR 200.303(d) and 2 CFR 200.508(c); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

25.

<p>Did the auditee electronically submit to the Federal Audit Clearinghouse the data collection form described in 2 CFR 200.512(b) and reporting package described in 2 CFR 200.512(c) within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period? [2 CFR 200.512(a) and (d); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

26.

<p>a. Did the recipient inform subrecipients of the Subpart F audit requirements at the time of the subaward? [2 CFR 200.331(a)(2); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(m); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. Has the recipient verified that every subrecipient is audited, as required by Subpart F, when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the \$750,000 expenditure threshold? [2 CFR 200.331(f); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(m); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>c. Has the recipient ensured that the subrecipients take timely and appropriate action on all deficiencies pertaining to HUD awards it provided to subrecipients that were detected through audits, on-site reviews, and other means? [2 CFR 200.331(d)(2); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(m); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>d. Has the recipient issued a management decision for audit findings that relate to HUD awards that it makes to subrecipients? [2 CFR 200.331(d)(3); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(m); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

27.

<p>Has the recipient ensured that the HUD award is charged no more than a reasonably proportionate share of the costs of audits required by, and performed in accordance with, Subpart F? [2 CFR 200.425(a); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(p); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.605; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

28.

<p>When a recipient expends Federal awards under only one Federal program and the Federal program's statutes, regulations, or the terms and conditions of the Federal award do not require a financial statement audit of the auditee, the auditee may elect to have a program-specific audit conducted in accordance with §200.507, <i>Program-specific audits</i>. When a program-specific audit is elected for a HUD program, the auditee and auditor must have basically the same responsibilities for the Federal program as they would have for an audit of a major program in a single audit. Answer the following questions if the recipient has elected to have a program-specific audit performed.</p>	
<p>a. Has the auditee prepared the financial statement(s) for the HUD program that includes, at a minimum, a schedule of expenditures of Federal awards for the program and notes that describe the significant accounting policies used in preparing the schedule, a summary schedule of prior audit findings consistent with the requirements of 2 CFR 200.511(b), and a corrective action plan consistent with the requirements of 2 CFR 200.511(c)? [2 CFR 200.507(b); CDBG Entitlement: 24 CFR 570.502; State CDBG: 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>b. Did the auditee electronically submit to the Federal Audit Clearinghouse the reporting package required by 2 CFR 200.507(c)(3) and the data collection form prepared in accordance with 2 CFR 200.512(b) within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period? [2 CFR 200.507(c); CDBG Entitlement: 24 CFR 570.502; State CDBG; 24 CFR 570.489(n); HOME: 24 CFR 92.505; HOPWA: 24 CFR 574.650; ESG: 24 CFR 576.407(c); CoC: 24 CFR 578.99(e) and (g)]</p>	<table style="width: 100%; border: none;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
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Yes	No	N/A					
<p><b>Describe Basis for Conclusion:</b></p>							