

TxCDBG PROGRAM - SELF-MONITORING REVIEW

REVIEWER INSTRUCTIONS

1. **Review** - The compliance self-monitoring must consist of a physical review of the Grant Recipient’s project records. Complete the applicable monitoring review checklists on TDA-GO, which may include:
 - Procurement of Professional Services/Administration Services
 - Environmental Review
 - Construction/Materials Contract Procurement Review
 - Labor Standards Review
 - Civil Rights Review
 - Acquisition of Real Property Review
 - Force Account Review

Each item on the checklists must have a check mark with pertinent written remarks in the “Documents Source, Comments, and Corrective Action Taken” section based on the documentation examined in the local government files. If not applicable, include an explanation. If a checklist is not applicable, then reply by uploading a brief explanation (e.g., “There was no force account for construction or administrative work on the project”).

2. **Findings** - Any policy or procedural violation findings discovered during the review must be included on the checklist and must be self-reported to the Texas Department of Agriculture (TDA). Findings must be addressed as follows:
 - Indicate non-compliance on the appropriate checklist with a brief explanation of facts in the comments column.
 - Attach any document relevant to the finding to the checklist. For instance, a copy of the published request for qualifications advertisement that did not provide at least ten days notice before the proposal due date should be included with the response sent to TDA.
 - For any findings that can be remediated, attach evidence demonstrating that the Grant Recipient has come into compliance. For example, during the environmental review the Grant Recipient did not notify the Environmental Protection Agency (EPA) of the Finding of No Significant Impact (FONSI) as required by federal regulation. The monitoring response should include a copy of the letter or email to the EPA as evidence that notice of the FONSI has been provided.
 - For any findings that cannot be remediated after their occurrence, the Grant Recipient must provide TDA with a written corrective action plan (CAP) which will better ensure compliance with pertinent program policies for any ongoing or future TxCDBG-funded projects. The CAP must be on the Grant Recipient’s letterhead and must be signed by the chief elected official or by the executive officer for the grant designated by the local government body.

The CAP must specifically include the following elements:

- 1) A statement acknowledging the violation determined in TDA's monitoring finding.
 - 2) Identify the cause of the violation and specify the process to be implemented for improving performance and complying with program requirements.
 - 3) Identify who will be involved in the process.
 - 4) Name a certifying officer responsible for implementing the plan.
 - 5) Provide the date on which the corrective measures will be implemented, which includes a statement affirming that the CAP will remain in effect for any future TxCDBG awards.
 - 6) A statement acknowledging that failure to effectively improve performance may result in a reduction of funding or other sanctions as determined by TDA.
3. **Certification** - When the self-monitoring review is completed, the chief elected official (authorized official) for the grant designated by the local government body must transmit the required project documents and completed checklists to the Grant Compliance Monitor through TDA-GO. The Grant Recipient must maintain a copy of the completed self-monitoring review documents with their project records.
4. **TDA Acceptance of Self-Monitoring Review** – Upon receipt of the Grant Recipient's self-monitoring review checklists, the Monitor will review the checklists for completeness and for any self-reported compliance deficiencies. The Monitor will determine whether violations have been satisfactorily addressed and/or whether additional documentation from the Grant Recipient is required. Repeat violations or violations of state or federal law or regulations may be assessed additional sanctions or penalties if warranted. The Monitor will send the Grant Recipient and Reviewer notification of acceptance of the self-monitoring review, notification of additional documents required, or notification of additional sanctions imposed following receipt of the self-monitoring review packet.