

SUBRECIPIENT POLICIES REQUIREMENTS CHECKLISTS AND SELF-CERTIFICATION

The following is a checklist of CDBG-DR General Policies to aid subrecipients¹ in their responsibility of ensuring they have written policies, procedures and internal control systems that comply with CDBG-DR policies and applicable standards, as agreed upon in the executed SRA with PRDOH.² This checklist should not be used or relied upon by subrecipients as a substitute for familiarity and compliance with the applicable regulations. Please check the applicable boxes.

POLICY*	REQUIREMENT(S)	ADOPTED/ CREATED	PLEASE CHECK THE ADOPTION METHOD, IF APPLICABLE	TITLE OF THE POLICY, PAGE AND/OR SECTION WHERE THE WRITTEN REGULATION IS LOCATED (CREATED/ADOPTED)	SUMMARY OF APPLICABILITY
Anti-fraud, Waste, Abuse, or Mismanagement Policy https://www.cdbg-dr.pr.gov/en/download/afwam-policy/	Subrecipients have to adopt and implement PRDOH-approved policy	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		The AFWAM Policy applies to any allegations or irregularities, either known or suspected, that could be considered acts of fraud, waste, abuse, or mismanagement, involving any citizen, previous, current or potential applicant, beneficiary, consultant, contractor, employee, partner, provider, subrecipient, supplier, and/or vendor under the CDBG-DR Program.
Personally Identifiable Information, Confidentiality, and Nondisclosure Policy https://www.cdbg-dr.pr.gov/en/download/personally-identifiable-information-confidentiality-and-nondisclosure-policy/	Subrecipients have to adopt and implement PRDOH-approved policy	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		The PII Policy applies to PRDOH CDBG-DR program employees, staff, providers, vendors, suppliers, contractors, subcontractors, consultants, partners, applicants, and recipients. This policy assures confidential and/or sensitive information remains secure and is used in the appropriate manner for which it was intended.

¹ Subrecipient: May be a public or private nonprofit agency, authority or organization, or community-based development organization receiving CDBG-DR funds from the recipient or another subrecipient to undertake CDBG-DR eligible activities. 24 C.F.R. § 570.500(c). It is further defined at 2 C.F.R. § 200.1 as an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award.

² **Disclaimer:** This list may be amended from time to time to ensure that new policies and edits to previously adopted policies are included. All PRDOH CDBG-DR policies are subject to change. As changes are made, these will be reported to the subrecipients.

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<p>Conflict of Interest and Standards of Conduct Policy</p> <p>https://www.cdbg-dr.pr.gov/en/download/conflict-of-interest-and-standards-of-conduct-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The COI Policy applies to all PRDOH and CDBG-DR employees, officers, designees, subrecipients, sub grantees, partners, consultants, vendors and/or contractors affiliated to CDBG-DR funded projects, activities and/or operations, and/or any person who participates in auction bids, submits quotes, is interested in executing contracts or agreements or seeks to receive an economic incentive through their relationship with PRDOH and CDBG-DR.</p> <p>The Standards of Conducts apply to employees engaged in the award or administration of contracts under the CDBG-DR Program through the PRDOH and any of its subrecipients.</p>
<p>Citizen Complaints Policy</p> <p>https://www.cdbg-dr.pr.gov/en/download/citizen-complaints-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The Citizen Complaints Policy applies to all PRDOH CDBG-DR complaints received regarding program administration, management, and/or operation procedures.</p> <p>Complaints received by Regional PRDOH offices, Subrecipients, Contractors, HUD, other agencies, and other CDBG-DR divisions or areas should be immediately notified to PRDOH CDBG-DR Legal Division via email or regular mail at the addresses mentioned. Forwarded complaints will be evaluated by PRDOH upon receipt and handled appropriately.</p>
<p>Fair Housing and Equal Opportunity Policy</p> <p>https://cdbg-dr.pr.gov/en/download/fair-housing-and-equal-opportunity-fheo-policy-for-cdbg-dr-programs/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>This FHEO Policy describes requirements and protocols that have the goal of ensuring all CDBG-DR programs affirmatively further fair housing and promote equal opportunity to all individuals to participate in and benefit from these programs, both as program beneficiaries and as employees working to support these programs.</p> <p>PRDOH, as grantee, and its subrecipients, contractors, and other program participants will ensure that CDBG-DR activities are conducted in a manner which will not cause discrimination on the basis of race, creed, color, national origin, religion, sex, disability, familial status, gender identity, sexual orientation, marital status, or age.</p> <p>The FHEO Policy describes the requirements for PRDOH, subrecipients, and contractors, as well as provides guidance for how they apply to Housing, Economic Recovery, Planning, Infrastructure, and Multisector programs and activities. As such, PRDOH, as grantee, and its subrecipients, contractors, and other program participants must comply with the following federal and commonwealth laws and regulations.</p>

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<p>Reasonable Accommodation Policy</p> <p>https://cdbg-dr.pr.gov/en/download/reasonable-accommodation-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>PRDOH CDBG-DR and its subrecipients and contractors, shall not discriminate on the basis of disability, on its face or as applied, while interpreting local laws, regulations, or during the administration of state or federally funded housing programs.</p> <p>The Reasonable Accommodation Policy provides consistency and guidance to all PRDOH CDBG-DR staff, subrecipients, and contractors on the handling of reasonable accommodation and modification requests they receive from individuals claiming a disability.</p> <p>This Policy is based in federal fair housing laws and automatically supersedes any existing policy and/or practice applicable to the PRDOH CDBG-DR Program and its subrecipients and contractors, as well as all Puerto Rico laws and regulations that in any way conflict or otherwise affect disabled individuals' rightful claims to integrated and accessible housing services, reasonable accommodations and/or modifications.</p>
<p>Language Access Plan For The All CDBG-DR Programs (LAP)</p> <p>https://www.cdbg-dr.pr.gov/en/download/plan-de-acceso-al-idioma/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>As the federal oversight agency for CDBG-DR funds, HUD requires that PRDOH, as the grantee, have policies and procedures in place to facilitate the communication between the agency and the public, including but not limited to residents, administering entities, subrecipients, contractors, and/or developers and subcontractors participating in the CDBG-DR programs outlined in the Disaster Recovery Action Plan.</p> <p>PRDOH is further responsible for ensuring that all subrecipients, including contractors and sub-contractors provide services that are accessible to linguistic minorities in the island as established by this Plan. This sets forth policy and guidance for CDBG-DR programs to provide language access services to LEP/LSP individuals interested or participating in these federally funded programs.</p>

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<p>Section 3 Policy</p> <p>https://cdbg-dr.pr.gov/en/download/section-3-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The PRDOH CDBG-DR Program and its subrecipients, contractors, subcontractors, and subrecipient contractors are subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended (Section 3).</p> <p>It is PRDOH's policy to require from its subrecipients, contractors, subcontractors and contractors of subrecipients to provide training and equal employment opportunity to Section 3 Residents, to the greatest extent feasible and to take affirmative action to ensure that both, job applicants and existing employees, are given fair and equal treatment. Section 3 is race and gender neutral. It seeks to ensure there will not be discrimination based on economic status.</p> <p>PRDOH, its contractors, subcontractors, subrecipients and their respective contractors and subcontractors, must demonstrate compliance, to the greatest extent feasible, with Section 3 by meeting HUD's numerical goals for providing training, employment, and contracting opportunities to Section 3 Residents and Section 3 Business Concerns.</p> <p>Recipients, contractors, and subcontractors are held to all applicable Section 3 goals including hiring and contracting goals that pertain to construction and/or nonconstruction contracts under the entity's purview.</p>
<p>Minority and Women-Owned Business Enterprise Policy (W/MBE Policy)</p> <p>https://cdbg-dr.pr.gov/en/download/mwbe-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The W/MBE Policy establishes minimum goals for M/WBE participation to be measured based on the total contract dollar value accrued to W/MBE firms and to promote equal opportunity for participation amongst W/MBE, in all phases of CDBG-DR contracting, across Subrecipients and Contractors.</p> <p>This Policy establishes the responsibilities for Subrecipients and Contractors using CDBG-DR funding and how Subrecipients as well as Contractors can comply with the requirements for W/MBE.</p>

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<p>Davis-Bacon and Related Acts Policy (DBRA Policy)</p> <p>https://www.cdbg-dr.pr.gov/en/download/davis-bacon-and-related-acts-policy/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The Davis-Bacon Act requires the payment of prevailing wage rates to all laborers and mechanics on Federal government construction contracts in excess of \$2,000.</p> <p>By executing a CDBG-DR Subrecipient Agreement (SRA) with PRDOH, Subrecipients agree to administer and enforce all Davis-Bacon labor standards requirements and accept the responsibilities described in this policy.</p> <p>All direct PRDOH contractors, Subrecipients and contractors of Subrecipients are responsible for factoring in costs associated with Davis-Bacon and Related Acts compliance and the corresponding wage determinations. The PRDOH is responsible for promoting and monitoring contractor compliance with Davis-Bacon standards.</p> <p>PRDOH requires Subrecipients using CDBG-DR funds to adopt these policies to include labor standards and wage determination clauses in all construction contracts subject to labor standard provisions. See Labor Standards - Davis-Bacon and Related Acts Clauses to include in construction contracts. HUD form 5370 excerpt in Appendix A.</p> <p>The Policy details applicable to Davis-Bacon requirements that must be complied by Subrecipients participating in CDBG-DR projects.</p>

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<p>Uniform Relocation Assistance Guide & Residential Anti-Displacement and Relocation Assistance Plan</p> <p>https://cdbg-dr.pr.gov/en/download/ura-adp-guidelines/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved policy</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The URA Policy applies to all CDBG-DR-assisted activities that involve the acquisition of real property, easements, or the displacement of persons, including displacement caused by rehabilitation and demolition activities.</p> <p>If CDBG-DR assistance is used in any part of a project, the URA governs the acquisition of real property and any resulting displacement, even if local funds were used to pay the acquisition costs.</p> <p>Private persons, corporations or businesses that acquire property or displace persons for a CDBG-DR-assisted project are subject to the URA.</p> <p>Under the URA, all persons displaced as a direct result of acquisition, rehabilitation, or demolition, for a CDBG-DR-assisted project, are entitled to relocation payments and other assistance.</p> <p>Acquisition that takes place on or after submission for assistance to the CDBG-DR program to fund an activity on that property is subject to URA, unless the Applicant shows that the acquisition is unrelated to the proposed CDBG-DR activity. Acquisition that takes place before the date of submission for assistance will be subjected to the URA if the PRDOH determines that the intent of the acquisition was to support a subsequent CDBG-DR activity.</p>
<p>Cross-Cutting Guidelines</p> <p>https://www.cdbg-dr.pr.gov/en/download/cross-cutting-guidelines/</p>	<p>Subrecipients have to adopt and implement PRDOH-approved guidelines.</p>	<p><input type="checkbox"/> Adopted PRDOHs'</p> <p><input type="checkbox"/> Created New</p>	<p><input type="checkbox"/> Ordinance</p> <p><input type="checkbox"/> Administrative Order</p> <p><input type="checkbox"/> Corporate Resolution</p> <p><input type="checkbox"/> Other: _____</p>		<p>The requirements stated in these Cross-Cutting Guidelines apply to all programs described in PRDOH's Action Plan and all subsequent amendments, therefore it will be applicable to its subrecipients and contractors.</p>

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<p>Procurement Policy</p>	<ul style="list-style-type: none"> 2 C.F.R. §200.318 through 2 C.F.R. §200.327 	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		<p>Under the provisions set forth in Administrative Orders 21-20,21-27 and 21-28 which excludes Municipalities and all Subrecipient entities from compliance with the Procurement Manual and allows them to conduct their procurement procedures using the dispositions of 2 C.F.R. § 200.318 through 2 C.F.R. § 200.327 in their acquisition procedures related to the CDBG-DR Program.</p> <p>The Subrecipient entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. 2 C.F.R. 200.318.</p> <p>The Subrecipient entity must have written procedures for procurement transactions. 2 C.F.R. 200.319</p>
<p>Financial Policy</p> <p>https://www.cdbg-dr.pr.gov/en/download/financial-policy/</p>	<ul style="list-style-type: none"> 2 C.F.R. Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. 24 C.F.R. § 570.502 Uniform Administrative Requirements. 2 C.F.R. § 200.303 Internal Controls. 2 C.F.R. § 200.419 Cost Accounting Standards and Disclosure Statement. 2 C.F.R. § 200.334 Retention Requirements for Records. 2 C.F.R. § 200.308 Revision of Budget and Program Plans. 2 C.F.R. §200 Subpart E – Cost Principles. 2 C.F.R. § 200.328 Financial Reporting. 2 C.F.R. Part 200.402 - 200.412 Cost Allowability and Classification 	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		<p>This policy outlines PRDOH's CDBG-DR financial management policies in its role as grantee. The policy is intended to serve as a guide for both internal and external controls related to the financial activity of the CDBG-DR program for use by the CDBG-DR Finance Division, other PRDOH staff, and/or PRDOH contractors and subrecipients.</p> <p>PRDOH and its subrecipients are required to adopt financial management policies that include the following key components:</p> <ul style="list-style-type: none"> ○ Internal Controls; ○ Cost Accounting and Records; ○ Budgeting; ○ Cost Principles; and ○ Reporting <p>In the event that a Subrecipient or an administering entity does not have existing or complete financial policy, they are required to develop them. This Policy can be used as an example or may be adopted and implemented.</p>

	<ul style="list-style-type: none"> • 2 C.F.R. § 200.475 –Travel Costs • 83 FR 5844; 83 FR 40314; and 85 FR 4681 Budget Caps • 2 C.F.R. Part 200 Appendix VII Indirect Cost • 2 C.F.R. §200.305(b) and 31 C.F.R. §205 – 83 FR 5844 Timely Expenditure of Funds • 2 C.F.R. § 200.431- Fringe Benefits • 24 C.F.R. § 570.489 (f)(3) Revolving Funds • 24 C.F.R. § 570.207 Ineligible Activities • Regulation No. 9133, December 9, 2019 Property Management 				
<p>Recordkeeping, Management, and Accessibility Policy</p> <p>https://www.cdbg-dr.pr.gov/en/download/record-keeping-management-and-accessibility-policy-rkma-policy/</p>	<ul style="list-style-type: none"> • 24 C.F.R. § 570.506 Records to be maintained • 24 C.F.R. § 570.493 - 83 FR 5844 HUD's reviews and audit • 2 C.F.R. § 200.318(i) – Procurement Documents • PRDOH RKMA Policy 	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		<p>The RKMA Policy established that subrecipients and administering entities are responsible for adhering to PRDOH-approved record-keeping policy.</p> <p>In the event that a Subrecipient or an administering entity does not have existing record-keeping policies, they are required to develop them. This Policy can be used as an example or may be adopted and implemented.</p>
<p>Occupational Safety & Health Policy</p> <p>https://www.cdbg-dr.pr.gov/en/download/osh-r3-guideline/</p>	<ul style="list-style-type: none"> • 29 L.P.R.A. 361, et seq. Puerto Rico Occupational Safety and Health Act • 29 C.F.R. §1926.1 et seq. Safety and Health Regulations for Construction • PRDOH OS&H Policy 	<input type="checkbox"/> Adopted PRDOHs' <input type="checkbox"/> Created New	<input type="checkbox"/> Ordinance <input type="checkbox"/> Administrative Order <input type="checkbox"/> Corporate Resolution <input type="checkbox"/> Other: _____		<p>Act No. 16 of August 15, 1975, as amended, 29 LPRA 361, et seq., known as the “Puerto Rico Occupational Safety and Health Act”, (Act 16), was adopted with the purpose of guaranteeing overall safety and health conditions in the workplace.</p> <p>CDBG-DR Program Subrecipients and Contractors are subject to the provisions of Act 16 and as such are responsible for complying with the requirements found thereunder. It is PRDOH's priority to ensure the provisions of this Policy are complied with through periodic oversight of all Program Areas with the applicable entities, subrecipients and contractors, safety officers and any subcontractors of either entity– collectively referred to as Program Subrecipients/Program Contractors.</p> <p>CDBG-DR Program Subrecipients and Contractors shall comply with the standards of safety and health as contained in Act 16 and provisions under Part 1926 of the Code of Federal Regulations, regarding Safety and Health Regulations for Construction (29 C.F.R. §1926.1 et seq.) and must also comply with the requirements set forth in this Policy.</p>

*** The Subrecipient entities must followed PRDOH Policy. Therefore, the Subrecipients shall adopt and implement PRDOH's Policies.**

**** In the event that a Subrecipient or an administering entity does not have existing or complete policy, they are required to develop them. PRDOHs published policies can be used as an example to develop the entities policies or may be adopted and implemented.**

***** List of requirements is not exhaustive.**

Self-Certification

I _____ in representation of _____ ("the Subrecipient") certify that this information is complete and accurate. I acknowledge that under the executed SRA, all services shall be made in accordance with PRDOH guidelines, HUD guidelines and regulations whether existing or to be established, and other applicable state and federal laws and regulations. I acknowledge, as stated in the SRA the Subrecipient shall also comply with applicable PRDOH's policies and guidelines as established in Program Guidelines and their amendments, if any, as found in the CDBG-DR website (www.cdbg-dr.pr.gov).

I acknowledge that is the organization responsibility to develop, update and implement all policies and procedures in compliance with PRDOH CDBG-DR policies and procedures. I certify that the _____ (Subrecipient's name) has developed, updated and/or implemented all applicable PRDOH CDBG-DR policies and procedures.

Print Name _____

Signature _____

Date _____