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I. Purpose				
<p>An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the <u>National Environmental Policy Act (NEPA)</u>, and other related Federal and state environmental laws.</p> <p>The purpose of the environmental review is to determine the recipient's compliance with HUD's environmental review and clearance requirements, as outlined in 24 CFR Part 50 and Part 58. Under the Indian Community Development Block Grant (ICDBG) program, the Tribe <u>must</u> assume the responsibilities for completing environmental reviews, unless a claim of legal incapacity is made and sustained by HUD. However, under</p>	<p>24 CFR Parts 50 and 58</p>	<p>https://www.hudexchange.info/programs/environmental-review/</p> <p>2012 HUD Environmental Review Compliance Guidebook (Part 58)</p>		



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NAHASDA [Indian Housing Block Grant (IHBG), Title VI, and Section 184 programs], the Tribe may decline the responsibility for carrying out the environmental review responsibilities under 24 CFR Part 58. If a Tribe declines the responsibility, the environmental review responsibilities are carried out by HUD under 24 CFR Part 50.				
Funds cannot be committed or used to undertake a program or activity listed in 24 CFR 58.1(b) if the activity or project would have an adverse environmental impact or limit the choice of reasonable alternatives.	24 CFR 58.22 24 CFR 50.3(h)(3) 24 CFR 1000.20(b)(3) 24 CFR 1003.605			
NOTE: A Phase I environmental site assessment does not satisfy the requirements of an Environment review under 24 CFR Part 58.				
II. Pre-Visit Preparation				
<p>A. If available, review the following documents:</p> <ol style="list-style-type: none"> 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Previous environmental monitoring findings and corrective action status for findings 3. Previous self-monitoring report(s) 				



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4. Previous 2 CFR Part 200 and OIG 5. audits, workpapers, and management plan status for findings 6. Previous and current enforcement actions 7. Valid complaints 8. Relevant correspondence				
B. Review the applicable regulations and develop the scope of work based on the following:				
1. Review Indian Housing Plans (IHP) (and amended IHPs) submitted by the recipient to determine whether (and for which projects):				
a. the Tribe assumed responsibility for the environmental reviews under 24 CFR Part 58, or				
b. the reviews were to be done by HUD under 24 CFR Part 50.				
2. Utilize Table II of the APR to develop a monitoring strategy.				
3. Show actual or planned start dates for each project or activity.				



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II. On-Site Review				
Without exception, all Environmental Review Records must include a determination that an action did or did not trigger the requirements of the Flood Disaster Protection Act , the Coastal Barriers Resources Act and include a disclosure of properties located in airport runway clear zones .	24 CFR 58.6(a) 24 CFR 58.6(c) 24 CFR 58.6(d)			
Sovereignty does not negate the requirement of contacting state agencies.	24 CFR 58.14 & 58.2(a)(7)(ii)			
III. Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities				
Note: If the Tribe has not assumed environmental review responsibilities, go to Section XI, HUD Environmental Reviews and Clearance.				
If there is an environmental violation, it is a finding , and appropriate corrective actions will need to be taken to address the finding.				
Obtain the environmental review record (ERR) for each covered activity in the sample. Conduct the review in accordance with the following sections as appropriate for the type of project activity.				



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If deficiencies are noted in the ERRs sampled, the environmental review should be expanded to evaluate environmental records completed by the recipient since the last on-site review.				
IV. Flood Insurance Requirements				
A. Federal funds may not be used for acquisition and construction (including rehab), even if the activity is exempt or categorically excluded, in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, unless:	24 CFR 58.6(a)(1)			
1. The community is participating in the National Flood Insurance Program (NFIP), and	24 CFR 58.6(a)(1)(i) and (ii)			
2. the recipient purchases and maintains flood insurance under that program.				
B. Review the FEMA Flood hazard Boundary Map or Flood Insurance Rate Map for the community to determine whether project site is located in a special flood hazard area.				
C. If so, review the recipient's files to determine if the recipient has purchased and is maintaining flood insurance through the NFIP.				



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V. Exempt Activities				
A. Typical exempt activities include:				
1. Environmental and other studies	24 CFR 58.34(a)(1)			
2. Development of plans and strategies	24 CFR 58.34(a)(1)			
3. Information and financial services	24 CFR 58.34(a)(2)			
4. Administration and management activities	24 CFR 58.34(a)(3)			
5. Public services not having a physical impact or resulting in physical changes (i.e., employment, crime prevention, education, counseling, etc.)	24 CFR 58.34(a)(4)			
6. Inspections and testing for hazards or defects	24 CFR 58.34(a)(5)			
7. The purchase of insurance	24 CFR 58.34(a)(6)			
8. The purchase of tools	24 CFR 58.34(a)(7)			
9. Engineering or design costs	24 CFR 58.34(a)(8)			
10. Technical assistance and training	24 CFR 58.34(a)(9)			



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11. Emergency repairs	24 CFR 58.34(a)(10)			
a. Emergency repairs are limited.				
b. There is no “ Emergency Rehabilitation. ”				
12. Payment of principal and interest	24 CFR 58.34(a)(11)			
B. Determine if the activities listed in the ERR are included in the list of exempt activities.	24 CFR 58.34			
C. Determine if the responsible entity (the Tribe) reviewed compliance with the other applicable regulatory requirements.	24 CFR 58.6			
1. If there is not adequate documentation for this review:				
a. Get a copy of the HUD format for projects that are Exempt per § 58.34 or Categorically Excluded, Not Subject To (CENST) per § 58.35(b). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.	24 CFR 58.34	HUD CENST / Exempt format HUD worksheets		



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
b. Complete the CENST package, and include it in its records for each activity or activities in this category.				
D. Determine if the recipient adequately documented the determination of exemption for each activity.				
1. If the recipient does not have adequate documentation for each activity:				
a. Get a copy of the Sample Statutory Checklist for Projects that are Exempt Per § 58.34, and	24 CFR 58.34	(see link under VI.C.1.a., above)		
b. Complete the Checklist and include it in its records for each activity in this category.				
E. Include in the work papers a copy of one correctly completed record and/or documents to support each error disclosed. The errors documented will be the basis for the environment finding.				
F. Based on the number of errors disclosed, determine if expanding the sample size is appropriate.				



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G. Obtain copies of the corrected records before completing the review. Lack of documentation on exempt activities does not become a finding unless technical assistance has previously been provided and the recipient's records are still inadequate.				
VI. Categorical Exclusions (CAT EX), Not Subject to 24 CFR § 58.5				
A. Typical categorically excluded activities, which are not subject to §58.5, include:				
1. Tenant-based rental assistance;	24 CFR 58.35(b)(1)			
2. Supportive services (i.e., health care, housing services, etc.)	24 CFR 58.35(b)(2)			
3. Operating costs (i.e., maintenance, security, utilities, etc.)	24 CFR 58.35(b)(3)			
4. Economic development activities (i.e., equipment purchase, operating expenses not associated with construction or expansion, etc.)	24 CFR 58.35(b)(4)			
5. Down payment or close cost assistance to homebuyers for existing units.	24 CFR 58.35(b)(5)			



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B. Determine if the activities listed in the ERR are included in the list of categorical exclusions, not subject to 24 CFR § 58.5.	24 CFR 58.35(b)			
C. Determine if the responsible entity (the Tribe) reviewed compliance with regulatory requirements of 24 CFR § 58.6.				
1. If there is not adequate documentation for this review:				
a. Get a copy of the HUD format for projects that are Categorically Excluded, Subject To (CEST) per 58.35(a). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.	24 CFR 58.35(b)	HUD CEST format HUD worksheets		
b. Complete the CEST package and include it in its records for each activity in this category.				
D. Determine if the recipient adequately documented its determination of categorical exclusion, not subject to 24 CFR § 58.5, for each activity.				



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1. If the recipient does not have adequate documentation for each activity:				
a. Get a copy of the Sample Statutory Checklist for Categorical Exclusions Not Subject to § 58.5, and	24 CFR 58.35(b)	(See link under VII.C.1.a., above)		
b. Complete the Checklist, and include it in its records for each activity in this category.				
E. Include in the workpapers a copy of one correctly completed record and the documents to support each error disclosed. The errors documented will be the basis for the environmental finding.				
F. Based on the number of errors, determine if expanding the sample size is appropriate.				
G. Obtain copies of the corrected records before completing the review.				
I. Lack of documentation on categorically-excluded activities, not subject to 24 CFR § 58.5, does not become a finding unless:				
1. technical assistance has previously been provided, and				



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2. the recipient's records are still inadequate, or				
3. the recipient fails to complete the ERR prior to the issuance of the final monitoring report.				
VIII. Categorical Exclusions, Subject to 24 CFR § 58.5				
A. Typical categorically-excluded activities, which are subject to §58.5, include:				
1. Acquisition, repair, improvement, reconstruction, rehabilitation of public facilities (other than building) when the facilities:	24 CFR 58.35(a)(1)			
a. are in place and				
b. will be retained in the same use without change in size or capacity.				
2. Removal or material and architectural barriers	24 CFR 58.35(a)(2)			
3. Rehabilitation of buildings and improvements	24 CFR 58.35(a)(3)			



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4. An individual action (e.g., disposition, new construction, demolition, acquisition) on up to four dwelling units; or	24 CFR 58.35(a)(4)(i)			
5. An individual action on five or more units scattered on sites more than 2,000 feet apart and no more than 4 units per site.	24 CFR 58.35(a)(4)(ii)			
B. Determine if the activities listed in the ERR are included in the list of categorical exclusions, subject to 24 CFR § 58.5.	24 CFR 58.35(a)			
C. Determine if the responsible entity (the Tribe) reviewed compliance with applicable regulatory requirements.	24 CFR 58.6			
1. If there is not adequate documentation of this review in the recipient's files:				
b. Get a copy of the HUD format for projects that are Categorical Excluded, Subject To (CEST) per 58.35(a). The format should be supplemented by the HUD worksheets and supporting documentation for each applicable law and authority.		HUD CEST format HUD worksheets		



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a. Complete the CEST package and include it in its records for each activity in this category.				
D. Review each ERR to establish if compliance with the applicable laws and authorities was determined and documented; i.e., if there is a completed statutory worksheet.	24 CFR 58.5			
E. Determine if recognized authoritative sources were used to support the conclusions reached.				
1. If the recipient does not have adequate documentation for each activity:				
a. Get a copy of the Sample Statutory Checklist and		(see link under VIII.C.1.a., above)		
b. Complete the Checklist and include it in its records for each activity in this category.				
F. If it was determined and documented that there were no circumstances which required compliance with any of the applicable federal laws or authorities, the project converts to exempt under the provisions of 24 CFR § 58.34(a)(12).	24 CFR 58.5			



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1. No Request for Release of Funds (RROF), HUD-7015.15, is required.				
2. The activity may begin, i.e., funds may be obligated/expended on the activity once this determination had been made.				
3. If applicable, was such a determination documented?				
G. If compliance was required with any of the applicable federal laws or authorities were those actions needed to obtain compliance completed, e.g., the 8-step process required by E.O. 11988 Floodplain Management?	24 CFR 58.5			
H. Subsequent to obtaining compliance, were the RROF responsibilities, including public comment, met?	24 CFR 58.45			
1. Obtain a copy of the actual notice and affidavit of publication or evidence of posting.				
a. Was the HUD recommended format or an equivalent used for the publication or posting?				
b. Was the required public comment period complied with?				



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2. Obtain a copy of the RROF.				
a. If the certifying officer is someone other than the CEO of the Tribe:				
(1) ensure the certifying officer is properly designated, and				
(2) ensure the information is adequate and accurate.				
3. Obtain a copy of Form HUD-7015.16, Authority to Use Grant Funds, and determine whether it was executed by HUD.				
4. Determine the date HUD or other funds were obligated/expended on each activity.				
a. Compare this date to the date of the submission of the RROF and the date of the signed HUD-7015.16s.				
b. Document all discrepancies.				
I. Include in the workpapers a copy of one correctly completed record and documents to support errors disclosed on other records. The				



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errors documented will be the basis for the environmental finding.				
J. Based on the number of errors, determine if expanding the sample size is appropriate.				
IX. Environmental Assessments				
A. If an activity is not exempt or categorically excluded, an Environmental Assessment (EA) must be completed.	24 CFR 58.36 24 CFR 58.40 thru 58.47			
B. Typical activities that require environmental assessments include:				
1. Generally, new construction of 5 or more homes, or				
2. Any activity involving the conversion from one type of land use to another.				
C. Review and document that the recipient has adequately documented its EA by complying with the following:				
1. Completed the HUD Recommended Format for Projects that Require an Environmental Assessment or an equivalent assessment format for each		https://www.hudexchange.info/resource/3140/part-58-		



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project or activity on the list requiring an EA.		environmental-assessment-form/		
D. Review and document each project description to ensure that it adequately describes the project and the activities.				
1. Interview the project manager and other personnel.				
2. Obtain an adequate project description if the documented description is not sufficient.				
3. Ensure the additional information is added to the recipient's file.				
4. The ERR is <u>not</u> considered complete or adequate if an adequate description is not provided.				
5. This should be counted as an error, but does not constitute a finding by itself.				
E. Determine if the responsible entity (the Tribe) reviewed the compliance with the applicable regulatory requirements.	24 CFR 58.6			



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1. If there is not adequate documentation of this review:				
a. Get a copy of the Sample Statutory Checklist for Projects that Require an Environmental Assessment,	24 CFR 58.35(b)	(see link under IX.C.1, above)		
c. Complete the Checklist, and advise the recipient to include it in its records for each project or activity in this category.				
F. Does the ERR include the complete EA Format (including a statutory checklist)?				
G. Did the recipient use the HUD-recommended format?				
H. Did the recipient use recognized authoritative sources to support the conclusions reached?				
I. Did the EA result in a Finding of No Significant Impact (FONSI)?	24 CFR 58.40(g)(1)			
1. If so, obtain a copy of the FONSI.				



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<p>J. Did the recipient provide adequate public notice for the FONSI - Notice of Intent to Request a Release of Funds (NOI/RROF)? Note: a combined notice is normally used; however, separate notices may be used.</p>	24 CFR 58.43			
<p>1. Review the FONSI-NOI/RROF. Was the recommended HUD format or an equivalent used?</p>				
<p>2. Obtain a copy of the actual notice and affidavit of publication or evidence of posting.</p>				
<p>3. If the certifying officer is someone other than the CEO of the Tribe, ensure:</p>				
<p>a. the certifying officer is properly designated, and</p>				
<p>b. the information is adequate and accurate.</p>				
<p>4. Determine if adequate time was provided for public comment.</p>	24 CFR 58.45			



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K. Determine if the RROF was submitted to ONAP and if the Form HUD-7015.16, Authority to Use Grant Funds, was provided prior to the obligation/expenditure of funds for the project activity.	24 CFR 58.71			
1. Obtain a copy of the HUD-7015.16 and ensure that it is signed by ONAP.	24 CFR 58.72(a) and 58.77(a)			
2. Determine the date HUD or other funds were obligated/expended on each activity.				
a. Obtain a copy of the accounting records and supporting documentation for the first expenditure/obligation for the project.				
b. Compare this date to the date of the submission of the RROF and the date of the signed HUD-7015.16s				
c. Document all discrepancies.				
3. If the first expenditure/obligation is after the date of the signed HUD-7015.16, no further review is necessary.				



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4. If the first expenditure/obligation is prior to the date of the signed HUD-7015.16 (except for option agreements):				
a. determine if it occurred prior to the submission date of the RROF,				
b. determine the total amount expended or obligated prior to the submission and/or execution dates as compared to the total expenditures for the grant, and				
L. Obtain and retain copies of documentation to support the determinations.				
1. If there are no findings, one copy of each type of ERR as a sample is sufficient.				
2. If there are findings, sufficient documentation should be retained to support the findings, i.e., copies of contracts when funds were obligated before the ERR was completed.				
M. If the EA was not completed properly, <u>it is a finding.</u>				



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1. There is no authority or basis for making it a concern.				
2. Deficiencies are to be included in the summary.				
N. Determine if the recipient carried out any necessary mitigating actions.				
1. Are mitigating actions included in the ERR?				
2. If there were mitigating actions, were they included in any contract documents or scope of work?				
X. Environmental Impact Statement				
A. Determine if an Environmental Impact Statement (EIS) was required.	24 CFR 58.37 24 CFR Part 58, Subparts F and G			
B. Was a Notice of Intent to prepare an EIS published?				
1. Obtain a copy of the publication, along with an affidavit of publication.				
2. Was the NOI also sent to interested individuals, local, state, and federal agencies, including Headquarters and				



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the appropriate regional office of the Environmental Protection Agency?				
C. Was a draft EIS prepared?				
1. Review the EIS.				
2. Document the work papers with photocopies and other evidential matter that is available.				
3. Summarize the results of the review.				
D. Did the draft EIS result in receipt of public comments?				
1. If comments were received, did the recipient prepare a supplemental draft EIS?				



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2. Did the recipient disseminate the supplemental draft in the same manner as the draft EIS?				
E. Did the recipient prepare a final EIS?				
1. Did the recipient use the HUD-recommended format or an equivalent?				
2. Did the recipient send the final EIS to ONAP?				
3. If substantial changes were made to the project after preparation of the final EIS, did the recipient prepare a final supplemental EIS?				
F. Did the recipient wait at least 60 days for comments after publishing the final or supplemental final EIS and prior to preparing a Record of Decision?				
G. Document the reasoning for a determination of compliance/noncompliance for each ERR reviewed.				
H. If it is determined that any of the ERRs are not in compliance and a 100 percent review was not completed, contact the Supervisor				



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regarding expanding the review.				
XI. HUD Environmental Reviews and Clearance				
Note: If the Tribe has assumed environmental review responsibilities under 24 CFR Part 58 for all identified projects, go to Section IV, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.				
A. Review files to determine if the recipient:				
1. Submitted all available, relevant information necessary for ONAP to perform the environmental review for each property, as required by 24 CFR Part 50, or				
2. Prepared an EA for HUD review and evaluation.		Notice PIH 2002-25 (originally issued as PIH Notice 99-37)		
B. When on-site, review contract documents and scope of work documents to determine if the recipient carried out any required mitigating actions.				



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1. If not, was another site selected as an alternative?				
2. Was an EA conducted on the alternate site?				
C. Review accounting records and contract documents to ensure the recipient did not obligate or expend funds prior to HUD approval and FONSI (if required) for activities which were subject to environmental review (all activities not listed in Section III.A. of PIH Notice 2002-25).		PIH Notice 1999-37 (extended indefinitely by PIH Notice 2002-25)		
1. Did the recipient obligate/expend activities before receipt of HUD approval?				
2. Did the recipient complete any mitigation required before undertaking an activity?				
3. If the mitigation identified was not completed properly, it is a finding . There is no authority or basis for making it a concern.				



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XII. Summary				
<p>A. Summarize the results of the review in a work paper.</p> <p>B. Discuss significant issues with Supervisor.</p> <p>C. Develop findings, including questioned costs and corrective actions, as appropriate.</p> <p>D. Develop concerns because they could lead to a violation</p> <p>E. Develop report language, including any findings and concerns.</p> <p>F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended.</p>				

Reviewer Name:	
Review Date(s):	