

BLOOMBERG FEDERAL ASSISTANCE E311 FRAUD PREVENTION SELF-ASSESSMENT CHECKLIST

	Yes	No	N/A	Comments
USE OF FUNDS				
1. Has your municipality created a plan on how you intend to use the federal funds and ensure compliance with state and federal eligibility requirements?				
2. Is there a supervisory review process in place to verify the completeness and accuracy of information used in eligibility determinations?				
3. Has management clearly defined its objectives in conducting a risk assessment in order to identify potential risks and define risk tolerances?				
4. Are risk assessments conducted on a regular basis?				
5. Has management considered the potential for fraud, waste, and/or abuse when identifying, analyzing, and responding to risks?				
6. Has management taken into account enhanced cyber risks, information security, and privacy concerns?				
7. Will the federal funds be used for needs identified in response to the federal emergency?				
8. Are the federal funds being used for costs covered by other funding sources (e.g., duplication of benefits)?				
9. Does your municipality ensure the federal funds are available to diverse individuals and/or businesses in need?				
10. Are policies and procedures accessible to all employees, management, and oversight staff?				
11. Has your municipality reviewed and/or updated its policies and procedures to ensure internal				

Bloomberg Federal Assistance e311				
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controls are in place to satisfy federal funding requirements and the administration of funds?				
12. Are employees, management, and oversight staff trained on policies and procedures on a regular basis?				
13. Are COVID-19 federal funds segregated from other federal or state funds for similar purposes? Are these funds held in a separate bank account?				
14. Are all new employees oriented to the compliance program and standards/code of conduct within 30 days of their date of hire?				
15. Are current/existing policies reviewed at least every two years to reflect changes in laws, regulations, or processes?				
16. Are policies comprehensive and written in a manner that is understandable to the target audience?				
SOLICITATION				
1. Was an independent cost estimate developed by your municipality staff prior to the release of the bid or proposal?				
2. Are vendors, suppliers, and contractors instructed that, during the solicitation process, communication with government staff is limited to the procedure described in the bid solicitation and that communication outside those parameters is grounds for disqualification?				
3. Are vendors, suppliers, or contractors required to disclose all relationships they may have with the municipality staff?				
4. Are potential conflicts of interest communicated to appropriate individuals within the municipality?				

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5. Does your municipality train its staff regarding proper policies and procedures during the solicitation process, including key actions to take or prevent (e.g., making offers of non-federal employment; accepting compensation from a vendor, supplier, or contractor; disclosing and obtaining contractor bid or proposal information; failing to disclose personal relationships with bidders; etc.)?				
6. Does your municipality ensure bid or proposal information is disseminated equally to all potential bidders?				
7. How did your municipality identify the pool of potential bidders for the solicitation?			x	
8. How did your municipality identify small and diverse businesses to include in the solicitation (e.g., minority- and women-owned businesses)?			x	
9. Are a sufficient number of bidders demonstrating interest in the solicitation? How many bidders or proposers demonstrated interest in the solicitation? How many bidders or proposers responded to the solicitation?				
10. Did your municipality reach out to bidders or proposers who showed interest but did not respond to the solicitation to understand why?				
11. Was the bid or proposal publicly advertised?				
12. Did your municipality use a prequalification process to identify potential bidders or proposers? What is the prequalification process?				
13. Is the procurement team following the municipality's internal				

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procurement requirements for each bid or proposal?				
14. Has the procurement team been trained on federal grant procurement requirements?				
15. Is there an oversight mechanism in place to ensure a large bid pool and that no advantage is given to any particular vendor, supplier, or contractor?				
16. Does your municipality include the following key provisions to ensure it has a transparent process for receiving bids or proposals:				
a) Does your municipality have a clear process for accepting bids or proposals (e.g., timeliness, sealed, mail-in or electronic delivery, point of contact, etc.)?				
b) Did your municipality establish a bid/proposal committee? Do the committee members have the qualifications and experience to review the bids/proposals?				
c) Do you have a documented process for opening the bids/proposals?				
d) Do you have a documented process for evaluating and scoring bids/proposals?				
e) What is the process for requesting and reviewing best and final offers for bids/proposals?				
f) Does your municipality document decisions and award recommendations?				
17. Does your municipality periodically audit the solicitation process to ensure the procedures are working as intended?				
18. Are non-federal entities (pass-through entities/sub-recipients) required to disclose any potential conflicts of interest and to communicate them to appropriate individuals within the federal awarding agency or organization?				

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19. Are sole source contracts prohibited? Under what circumstances are they allowed?				
20. Does your municipality allow COVID-19 sub-recipients, such as non-profit organizations, to follow state or other procurement requirements that are inconsistent with competition requirements under the Uniform Cost Principles?				
VETTING				
1. Are you following your own jurisdiction's rules for vetting?				
2. Are you completing a federal suspension/debarment check at Federal Exclusions ?				
3. Are you checking local and state debarment and suspension lists?				
4. Has your staff reviewed prior evaluations of contractors or vendors used by your municipality in the past?				
5. As part of the vetting process, are you ensuring that vendors, suppliers, and contractors self-disclose whether they have:				
a) Been debarred from entering into any government contract?				
b) Been found non-responsible on any government contract?				
c) Been declared in default and/or terminated for cause?				
d) Been suspended from bidding or entering into any government contract?				
e) Received an overall unsatisfactory performance rating from any government agency on any contract?				
f) Had any permit, license, concession, franchise, or lease terminated for cause or revoked?				
g) Been disqualified for cause as a bidder on any permit, license, concession, franchise, or lease?				
h) Been investigated by any governmental agency, including, but				

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not limited to, federal, state, and local regulatory agencies in the past five (5) years (this applies to any of the submitting vendors; any of the submitting vendors' affiliates; or any individual currently or within that period serving as a principal owner, officer, or managerial employee)?				
6. Is there a process in place to vet proposed Minority and Women owned Businesses Enterprises ("MWBE")?				
7. Is there a process in place to ensure that subrecipients are following federal vetting requirements?				
8. Is there a process in place for reviewing and resolving red flags uncovered during the vetting process?				
9. Are contractors, suppliers, and grantees required to declare under the penalty of perjury that all information provided as part of the background process are true and accurate?				
10. Are all due diligence checks documented and placed in the contract file to ensure availability for future audits?				
11. Does your municipality periodically audit the vetting processes to ensure the procedures are working as intended?				
12. As part of the vetting process for self-certifications, what actions are taken to verify the information?				
13. As part of the vetting process, does your municipality share red flags across jurisdictional boundaries (e.g., state, county, city) to deter and detect potential fraud?				
FEDERALLY MANDATED AND SUGGESTED CONTRACT LANGUAGE				
1. Are all contracts reviewed prior to execution to ensure required federal				

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contract provisions are included? (i.e., Copeland Anti-Kickback Act, Debarments and Suspension, EEO, Code of Conduct, 2 CFR Required Contract Provisions , etc.)				
2. Are subrecipients instructed of their obligation to include required federal provisions in contracts they enter into as part of the grant?				
3. Do all contracts include a statement that your municipality should be granted access to records and that the vendor, supplier, contractor, and subrecipient must cooperate with any government audit, investigation, or review?				
4. Does your municipality periodically audit awarded contracts and templates to ensure required provisions are contained in the contracts?				
POST-AWARD OVERSIGHT AND INTERNAL CONTROLS				
1. Does your municipality have adequate staffing and resources to administer the federal funds and manage the programs?				
2. Does your municipality have an organizational chart?				
3. Are the responsibilities of employees, management, and oversight staff clearly defined?				
4. Is there appropriate supervision, training, and management of employees in remote or hybrid work settings?				
5. At the onset of a project, is the management and oversight team introduced to the program staff and vendors, suppliers, and contractors to set the tone of integrity and expectations?				
6. Has management established and operated monitoring activities to oversee continued performance and				

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compliance of federal funds and internal control systems?				
7. Does your municipality continuously review reporting requirements related to the federal funds?				
8. Are deadlines and procedures followed to ensure the municipality's compliance with reporting requirements related to the federal funds?				
9. Does your municipality ensure that subrecipients adhere to all requirements relating to their receipt of funds? How often does your municipality require its subrecipients to report on their use of funds (e.g., monthly, quarterly, etc.)? What supporting documentation are subrecipients required to provide to support use of funds?				
10. Does your municipality have a central repository for recordkeeping to store all documentation related to the administration of the federal funds and to be retained for the required period provided by the federal government?				
11. Is electronic data backed up regularly?				
12. Are appropriate records maintained to document whether an employee's salary and/or benefits are eligible to be reimbursed with federal funds?				
13. Has your municipality established a Hotline to allow staff, contractors, and the public to anonymously report suspected fraud, waste, abuse, and mismanagement? How is the Hotline advertised (posted flyers, website, etc.)?				

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14. Does your municipality have a compliance officer or someone dedicated to investigating allegations of fraud, waste, abuse, and mismanagement? If so, what is that person's title?				
15. How are complaints documented, tracked, and investigated and to whom are allegations of suspected fraud referred?				
16. Does staff communicate concerns of fraud, waste, and abuse to management and oversight staff and outside agencies on a regular basis?				
17. Has your municipality implemented a fiscal management plan to track the use of federal funds and expenditures separately from other local funds?				
18. Are different staff responsible for authorizing a transaction, recording the transaction in the accounting records, and maintaining custody of the assets resulting from the transaction?				
19. If an employee's salary is posted to multiple funds, programs, or functions, is the allocation of that employee's salary supported by timesheets or periodic time studies?				
20. Are overtime hours and/or other premium pay tracked and approved by a supervisor?				
21. Are materials and supplies inspected and inventoried when received?				
22. Does management evaluate employee job performance, including employees' performance of internal control responsibilities?				
23. Does management hold employees accountable for any deficiencies in performing their internal control responsibilities?				

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24. Does your municipality audit its programs in receipt of federal funds?				
25. Does your municipality periodically audit these processes to ensure the procedures are working as intended?				
26. Has your municipality provided training on what constitutes fraud, waste, abuse, and mismanagement, with a section on bribes/kickbacks?				

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