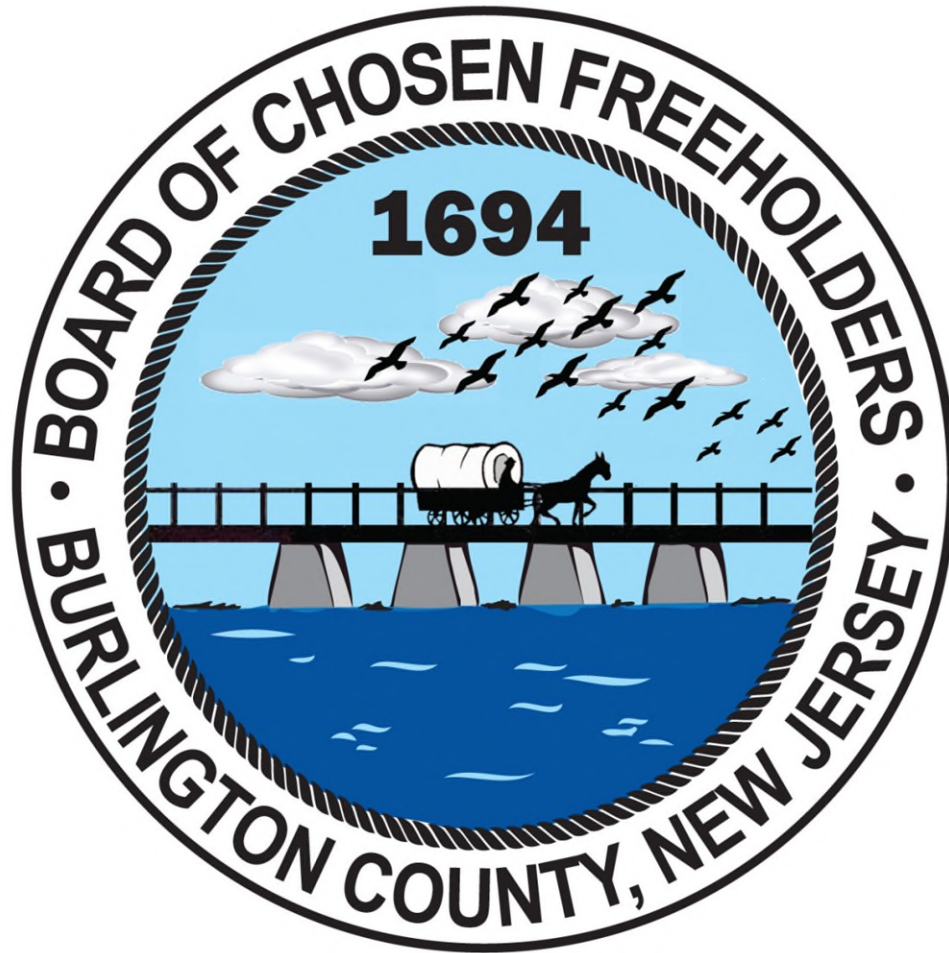


SUB-GRANTEE PROGRAM MONITORING HANDBOOK

AN INFORMATION GUIDE



BURLINGTON COUNTY COMMUNITY DEVELOPMENT PROGRAM

Updated 9/2024

BURLINGTON COUNTY
COMMUNITY DEVELOPMENT PROGRAM

Sub-grantee Program Monitoring Handbook

Contents

1. Monitoring Guide Narrative
2. On-site Project Monitoring Report Form
3. Procedures for Correction of Sub-recipient Audit or Monitoring Findings

BURLINGTON COUNTY
COMMUNITY DEVELOPMENT PROGRAM

Sub-grantee Program Monitoring Handbook

The Sub-grantee Monitoring Handbook has been issued by the Housing and Community Development Office to assist Sub-grantees in preparing information that will be reviewed by a program monitor during on-site visits. This is the fifth in the series of handbooks covering program procedures and compliance reviews during different phases in the implementation of Community Development Block Grant (CDBG) funded activities.

The primary purpose of the monitoring described in this Handbook is to assure that the planned national objectives of the CDBG Program are being met: that the targeted residents are receiving the intended benefit from the use of CDBG funds. Monitoring at this phase is also intended to provide Sub-grantees with technical assistance to assure that performance standards are met and the Sub-grantees' records reflect information that is consistent with information reported to the Community Development Office.

Each funded activity will be monitored at least once a year at the site of the activity and at the administrative site. During the visit, monitoring staff will meet the Sub-grantee's staff who are responsible for overseeing the funded activity and the Sub-grantee's records will be reviewed. Monitoring visits will be scheduled to occur after completion for construction projects or at or near the end of the program year for service projects. Prior to the monitoring visit, the Sub-grantee will be sent a letter of notification. This letter will outline the necessary information that the Sub-grantees must have available for review as well as the date and time for the scheduled visitation.

As part of the monitoring process, the Sub-grantee must demonstrate that each project has been carried out in accordance with the terms of the funding application and contract specifications. This will indicate how one of the three national objectives has been met, be it benefiting low and moderate income residents, aiding in the prevention or elimination of slums or blight, or addressing other community needs having a particular urgency. In addition, the Sub-grantee should identify other funding sources that have been utilized and show how private investment in the community has been encouraged as a result of Community Development Block Grant activity.

Timely completion of projects is a critical aspect of consideration for future Community Development Block Grant funding. It is of vital importance to HUD when evaluating the County's performance for the most recent program year. The tracking of timely performance is accomplished by the submission

of monthly progress reports. In reviewing these reports, monitors will be looking for evidence of obstacles that are preventing prompt performance, as well as the methods for removing these impediments. Failure to explain and remedy existing time delays may result in subsequent action by the County.

With the possibility that Community Development dollars will become scarcer in the future, private/local contribution will play a more significant role in the success of the program. Those communities not willing to invest their own dollars in a project may find it more and more difficult to obtain Block Grant funding in the future.

One important consideration regarding the allocation of Community Development funds is the past performance of program activities. Monitors check for delays in the implementation of projects, cost overruns and, if in fact the Sub-grantee accomplished what was described in the contract and implementation schedule. Poor performance history will require a reduction or elimination of funding for the poor-performing Sub-grantee in future grants.

NATIONAL OBJECTIVES

A. Applicable objective(s) (# = primary x = secondary)

1. Low/mod income benefit
 - Area benefit
 - Presumed benefit: qualifying group: _____
 - Accessibility barrier removal activity

Income eligibility required:

 - 51% low/mod
 - Exclusively low/mod
 - Nature and location for low/mod
 - Microenterprise activity
 - Job Training/Placement services
 - Housing: _____% low/mod occupancy
 - Job creation/retention: _____% employment

2. Slum/Blight
 - Slum/blight area
 - Spot blight
 - Urban renewal area

3. Particular urgency: Specify:

B. Low/Mod Income Benefit Activities

- | | | | |
|----|---|--------------|-------------|
| 1. | For presumed benefit activity: Is there clear evidence that the qualifying group is being served? | _____
YES | _____
NO |
| 2. | When income eligibility is required: | | |
| a. | Are individual beneficiary files maintained? _____ | _____
YES | _____
NO |
| b. | Are logs or records maintained demonstrating compliance with stated % low/mod income? _____ | _____
YES | _____
NO |
| 3. | Review a sample of client files. Attach list of names and addresses of clients reviewed. | | |
| 4. | Do client files contain documentation supporting low/mod income qualifications which include: | | |
| a. | Income limit applied | _____
YES | _____
NO |
| b. | Point in time benefit was determined. | _____
YES | _____
NO |
| c. | Verification of total annual household income and family size. | _____
YES | _____
NO |
| | Comments: | | |
| | _____ | | |
| | _____ | | |

C. Area Benefit Activities

Is the project serving the qualified area?	_____ YES	_____ NO
--	--------------	-------------

FAIR HOUSING/EQUAL OPPORTUNITY

- A. Are records maintained to identify racial and ethnic groups and single-headed households (applies to all but area benefit activities) who applied for, participated in or benefited from the activity? _____
YES _____
NO
Comments: _____

CONSISTENCY OF RECORDS

- A. Are Sub-grantee records consistent with the information submitted to the Grantee covering the following areas?
1. Public Notice and Commentary:
Public was furnished with information regarding the project and given opportunity to examine and comment. _____
YES _____
NO
 2. Labor Standards and Davis Bacon _____
YES _____
NO
 3. Section 109/EEO _____
YES _____
NO
 4. Copeland Anti-Kickback Act _____
YES _____
NO
 5. Section 3 _____
YES _____
NO
 6. Procurement _____
YES _____
NO
 7. Cost Allowability _____
YES _____
NO
- Comments: _____

- B. Is there any evidence of conflict of interest? _____
YES _____
NO
Comments: _____

- C. Are Drug Free Work Place requirements implemented? _____
YES _____
NO
Comments: _____

- D. Does Sub-grantee have Excessive Force Policy in place? _____
YES _____
NO
Comments: _____

PROGRAM INCOME

- A. Was any income generated by the project? _____
- | | | |
|--|-------|-------|
| | YES | NO |
| 1. If yes, was income reported to CD Office? | _____ | _____ |
| | YES | NO |

REGULATORY COMPLIANCE

For Governmental and Non-Governmental Agencies:

Does the sub-grantee comply with requirements and standards of Omniscircular 2 CFR Part 200 "Uniform Administrative Requirements, Cost Principals and Audit Requirements for Federal Awards; Final Rule?"

- | | | |
|---|-------|-------|
| | _____ | _____ |
| | YES | NO |
| 1) Financial administration | _____ | _____ |
| | YES | NO |
| 2) Allowable Costs | _____ | _____ |
| | YES | NO |
| 3) Non-federal audit | _____ | _____ |
| | YES | NO |
| 4) Equipment | _____ | _____ |
| | YES | NO |
| 5) Supplies | _____ | _____ |
| | YES | NO |
| 6) Copyrights | _____ | _____ |
| | YES | NO |
| 7) Sub-awards to debarred and suspended parties | _____ | _____ |
| | YES | NO |
| 8) Procurement | _____ | _____ |
| | YES | NO |
| 9) Subgrants | _____ | _____ |
| | YES | NO |
| 10) Financial reporting | _____ | _____ |
| | YES | NO |
| 11) Retention of records for four years | _____ | _____ |
| | YES | NO |

COMMENTS: _____

ADDITIONAL INFORMATION

- A. Describe any conditions observed that are of concern or interest not covered previously: _____

B. Conclusions, comments and recommendations, e.g.: report accuracy, Sub-grantee Management system, status of projects: _____

NAME OF MONITOR: _____

PROCEDURES FOR CORRECTION OF SUBRECIPIENT AUDIT OR MONITORING FINDINGS

Program staff shall determine whether sub-recipients have spent funds provided by the Community Development Program in accordance with applicable laws and regulations by reviewing sub-recipient audits and monitoring activities and records at the sub-recipient's site at least once each program year.

In the event that non-compliance with the laws and regulations is identified during these review processes, the following steps will be taken to ensure that the sub-recipient takes corrective action within six months.

A letter of notice shall be sent to the sub-recipient identifying problem areas and making recommendations for corrective action. A written response from the sub-recipient shall be required within 30 days describing the corrective action the sub-recipient intends to take. Program staff are assigned to provide technical assistance when necessary to develop corrective action. Program staff may seek advice or assistance from the County's Legal Department, independent auditors or HUD in order to assist sub-recipients in developing and implementing corrective action.

To be acceptable, the sub-recipient's response must describe actions which will remedy the non-compliance within six months from the date of the letter of notice. Program staff will follow up to ensure that the corrective measures described by the sub-recipient have been taken by examination of succeeding audits and on-site examination of records, personnel, activities in progress or other areas as needed.

The sub-recipient shall be informed in writing when corrective action is found to be complete.

In the event that a sub-recipient does not respond to the program's request for corrective action, fails to take corrective actions within six months or if an unlawful activity or serious irregularity is identified in the audit or monitoring review, the County's Legal Department shall be notified and requested to take appropriate action. The regional headquarters of HUD shall also be informed of the circumstances and of any actions the County determines it will take to seek remedy.