Managing CDBG Subrecipients:

Managing an effective community development program

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Managing CDBG Subrecipients:

Managing an effective community development program

Session 4



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QUESTIONS

Leftover questions from Session 3?



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Homework Assignment Three

- 1. What priority level does the proposed activity meet?
 - a) Identified need(s)/populations are high priority 10
 - b) Identified need(s) are medium priority 5
 - c) Identified need(s) are low priority 1
 - d) No need identified 0



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- 2. Based on your reading of Question 8 in the application, what score did you award for your understanding of the project? (Use the Item 4 Worksheet.)
 - a) 7-8 points
 - b) 5-6 points
 - c) 3-4 points
 - d) 1-2 points
 - e) No points



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Homework Assignment Three

- 3. Will the activity provide a good value to the City? What score did you award?
 - a) 7-8 points
 - b) 5-6 points
 - c) 3-4 points
 - d) 1-2 points
 - e) No points



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- 4. How did HVHRA do with its treatment of outcomes and measurements? What score did you award?
 - a) Outcomes/measurements well defined 10
 - b) Outcomes/measurements moderately well defined 5
 - c) Outcomes/measurements poorly defined 1
 - d) Outcomes/measurements not defined 0



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Homework Assignment Three

- 5. Based on your reading of the application, how experienced is HVHRA in administering grants? (Refer to your scoring of Question 7).
 - a) Very experienced 10
 - b) Some experience 5
 - c) Very little experience 3
 - d) No experience 0



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- 6. How well does HVHRA work with other organizations?
 - a) Coordinates services with multiple named agencies 5
 - b) Coordinates services with one named agency 4
 - c) Coordinates services with one or more unnamed agency 3
 - d) Networks with other named agencies 2
 - e) Networks with other unnamed agencies 1
 - f) Applicant operates in a vacuum 0



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Homework Assignment Three

- 7. The "bang-for-the-buck" question is probably the least objective criterion, but it can also make the difference between two competing applications. How did you score HVHRA?
 - a) 9-10
 - b) 6-8
 - c) 3-5
 - d) 1-2
 - e) 0



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- 8. What total score did you award the application?
 - a) 90-100
 - b) 80-89
 - c) 70-79
 - d) Less than 70



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Homework Assignment Three

- 9. Based on your reading of the application, will you vote to fund the activity?
 - a) Yes
 - b) Yes, but only if special conditions are included in the Subrecipient Agreement
 - c) No
 - d) Maybe. I still have some questions that need answers



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- 10. If you decide to fund the proposed project, which Matrix Code will you assign it in IDIS?
 - a) 05A
 - b) 05E
 - c) 05M
 - d) 05W



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Homework Assignment Three

- 10. If you decide to fund the proposed project, which Matrix Code will you assign it in IDIS?
 - a) 05A Senior Services
 - b) 05E Transportation Services
 - c) 05M Health Services
 - d) 05W Food Banks



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Agenda – Session 4

- ➤ The Subrecipient Agreement
- > Training Subrecipients



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The Subrecipient Agreement



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§570.303(a) Before disbursing any CDBG funds to a subrecipient, the recipient shall sign a written agreement with the subrecipient. The agreement shall remain in effect during any period that the subrecipient has control over CDBG funds, including program income.



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The Subrecipient Agreement

§570.503 lists the seven components required in every Subrecipient Agreement

- 1) Statement of work
- 2) Records and reports
- 3) Program income
- 4) Uniform requirements
- 5) Other program requirements
- 6) Suspension and termination
- 7) Reversion of assets



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§200.332(a) Requirements for pass-through entities. All pass-through entities must: (a) Ensure that every subaward is clearly identified to the <u>subrecipient</u> as a <u>subaward</u> and includes the following information at the time of the <u>subaward</u> and if any of these data elements change, include the changes in subsequent <u>subaward</u> modification. When some of this information is not available, the <u>pass-through entity</u> must provide the best information available to describe the Federal award and <u>subaward</u>.



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Federal Award Identification Worksheet

The subrecipient's name must match the name associated with its Unique Entity Identifier. The subrecipient should supply its UEI number in its application.



Until the UEI system is fully implemented, an organization's UEI# is its DUNS number. The transition was to have been completed by December 2020 but has been postponed to a date yet to be determined.



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The Subrecipient Agreement

Federal Award Identification Worksheet

The Federal Award Identification Number is on your jurisdiction's Grant Agreement

U.S. Department of Housing | 1 Urban Development |
Office of Community Planning and Development | OMB Approval No. 2506-0193 (exp 5/31/2018) |
| 3a. Grantee's 9-digit Tax ID Number | 3b. Grantee's 9-digit DUNS Number

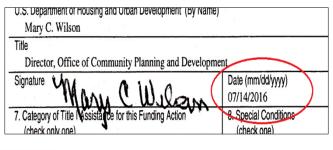
	3a. Grantee's 9-digit Tax ID Number 626000374	3b. Grantee's 9-digit DUNS Number 089553861
	4. Date use of funds may begin	
	(mm/dd/yyyy) 07/01/2016 5a. Project/Grant No. 1 B-16-MC-47-0009	6a. Amount Approved \$719,401.00
7	5b. Project/Grant No. 2	6b. Amount Approved



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Federal Award Identification Worksheet

The Federal Award Date is the date the award was signed by the appropriate official from HUD. The date is on your Grant Agreement:





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The Subrecipient Agreement

Federal Award Identification Worksheet

Start and stop dates for the Period of Performance and Budget Period come from the agreed-upon timeline. This grantee asked that question as part of its application.

7. Attach a detailed description of your proposed project. Describe the work to be performed, including the activities to be undertaken or the services to be provided, the goals and objectives of the project and the method of approach.

(Be specific about the days/times of services and the frequency and duration of services the days are average client or participant. A timeline/schedule including project start date and completion date must be submitted with the application.)

Item vi – Budget Period has been added to the FAIW effective Nov. 12, 2020.



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Federal Award Identification Worksheet

vii. Amount of Federal Funds Obligated to the Subrecipient by this action:

\$
viii. Total Amount of Federal Funds Obligated to the Subrecipient:

\$
ix. Total Amount of the Federal Award Committed to the Subrecipient

\$

vii. Total subaward – CDBG and any other Federal \$\$\$ obligated to activity

viii. Total this subaward plus any others funded by grantee using Federal funds, regardless of source

ix. Total CDBG subaward



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The Subrecipient Agreement

Federal Award Identification Worksheet

xii. Assistance Listing Number and Title

14.218 Community Development Block Grant (CDBG)

What was the CFDA number is now the Assistance Listing Number. The number and title for CDBG remain unchanged.



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xiii. Indirect Cost Rates -

§200.332(a)(4) An approved federally recognized indirect cost rate negotiated between the <u>subrecipient</u> and the Federal Government or, if no such rate exists, either a rate negotiated between the <u>pass-through entity</u> and the <u>subrecipient</u> (in compliance with this part), or a de minimis indirect cost rate as defined in § 200.414 Indirect (F&A) costs, paragraph (b) of this part.



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The Subrecipient Agreement

Federal Award Identification Worksheet

Will the subrecipient be using negotiated or *de minimis* indirect cost rate?

- If so, note it here.
- If not, note that indirect costs will not be eligible for reimbursement.

xiii. Indirect Cost Rate:



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(b) If Funding Assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E - Cost Principles, attach a schedule in the format set forth below to the executed Grant Agreement that is returned to HUD. The schedule shall identify each department/agency that will carry out activities with the Funding Assistance, the indirect cost rate applicable to each department/agency (including if the de minimis rate is charged per 2 CFR \$200.414), and the direct cost base to which the rate will be applied. Do not include indirect cost rates for subrecipients.

Murfreesboro CDBG Funding Assistance will not be used for the payment of indirect costs persuant to 2 CFR 200, Subpart E - Cost Principles.

*Specify the type of cost base utilized - e.g., Modified Total Direct Costs (MTDC). <u>Do not include amounts.</u>



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The Subrecipient Agreement

(1) Statement of work – "The agreement shall include a description of the work to be performed, a schedule for completing the work, and a budget."



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- "... sufficient detail to provide a sound basis for the recipient effectively to monitor performance under the agreement."
- Does the agreement include a statement of work and corresponding budget?
- Does the Statement of work provided sufficient detail for the program participant to monitor performance against the agreement as well as report on performance measurement progress?



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The Subrecipient Agreement

- (2) Records and reports "The recipient shall specify in the agreement the particular records the subrecipient must maintain and the particular reports the subrecipient must submit in order to assist the recipient in meeting its recordkeeping and reporting requirements."
 - Subrecipient must retain records the longer of three years...
 - After expiration or termination of the Subrecipient Agreement, or
 - After the submission of the CAPER describing the activity for the last time.
 - Three years is a minimum
 - The pass-through entity always had the authority to impose any additional conditions it considers appropriate.



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What records?

- (a) Records providing a full description of each activity assisted (or being assisted) with CDBG funds, including its location (if the activity has a geographical locus), the amount of CDBG funds budgeted, obligated and expended for the activity, and the provision in subpart C under which it is eligible
- (b) Records demonstrating that each activity undertaken meets one of the criteria set forth in §570.208. (Where information on income by family size is required, the recipient may substitute evidence establishing that the person assisted qualifies under another program having income qualification criteria at least as restrictive as that used in the definitions of "low and moderate income person" and "low and moderate income household" ...



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The Subrecipient Agreement

Are the reports producing the information needed to document the project in IDIS?



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(3) Program income – "The agreement shall include the program income requirements set forth in §570.504(c). The agreement shall also specify that, at the end of the program year, the grantee may require remittance of all or part of any program income balances ... held by the subrecipient..."

§570.504(c) Disposition of program income received by subrecipients. "The written agreement between the recipient and the subrecipient, as required by §570.503, shall specify whether program income received is to be returned to the recipient or retained by the subrecipient."



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The Subrecipient Agreement

The Super Circular rule on program income, §200.307, does not apply to CDBG.

Other exceptions are found in §570.502.



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- (4) Uniform Requirements "The agreement shall require the subrecipient to comply with applicable uniform requirements, as described in §570.502."
 - §570.502(a) Grantees and subrecipients shall comply with 2 CFR part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards"...



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The Subrecipient Agreement

- ➤ Grant recipients are encouraged to be explicit with respect to including the 2 CFR 200 requirements in order to promote a clear understanding an enhanced compliance by sub-awardees.
 - The agreement should list specific provisions (and the regulatory citations) that apply to the subrecipient.
 - Good examples:
 - Conflict of interest as covered in §200
 - Internal controls
 - Protection of personally identifiable information
 - Required certifications



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(5) Other Program Requirements – "The agreement shall require the subrecipient to carry out each activity in compliance with all Federal laws and regulations described in subpart K of these regulations."



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The Subrecipient Agreement

"This subpart K enumerates laws ... applicable to grants made under section 106 of the Act, ... including statutes expressly made applicable by the Act and certain other statutes and Executive Orders for which the Secretary has enforcement responsibility." (§570.600)



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(6) Suspension and termination — "The agreement shall set forth remedies for noncompliance and provisions on termination in accordance with 2 CFR part 200, subpart D."



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The Subrecipient Agreement

(7) Reversion of assets — "The agreement shall specify that upon its expiration the subrecipient shall transfer to the recipient any CDBG funds on hand at the time of expiration and any accounts receivable attributable to the use of CDBG funds."



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Is that all? Silly Question §200 provisions



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The Subrecipient Agreement

The Subrecipient Agreement must include a stipulation that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of §200 and §570.



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The Subrecipient Agreement may include any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to HUD, including identification of any required financial and performance reports.



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An example from Detroit of an additional requirement:

2.06 The Subrecipient shall develop and provide a copy of its Outreach Plan within thirty (30) days from the execution of this Agreement. The Subrecipient shall maintain the Outreach Plan, and make available for review by the City and HUD upon request including during site monitoring inspections.



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- ➤ Appropriate terms and conditions concerning Closeout of the subaward.
 - Subrecipient Closeout See §200.343 for specifics
 - Do not use §560.509 covers HUD-Grantee Closeout only



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The Subrecipient Agreement

A description of how any notices and reports required by the agreement are to be delivered, as well as the contact persons for both the grantee and the subrecipient.

This is how Salem MA sets this up in its Subrecipient Agreements:

IV. Notices

Communications and details concerning this agreement shall be directed to the following representatives:

Grantee

Subrecipient

Name, Director Department of Planning & Community Development 120 Washington Street Salem, MA 01970 978-XXX-XXX E-Mail



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- ➤ If the subrecipient is a faith-based organization, include language prohibiting the use of CDBG for inherently religious activities. Refer to 24 CFR 5.109 for a full discussion.
 - You might want to include a specific reference to §5.109(d)
 Separation of explicitly religious activities from direct
 Federal financial assistance in your agreement.



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The Subrecipient Agreement

- ➤ Your HUD monitor will want to see your Subrecipient Agreement:
 - Exhibit 3-16 Section C, Review of Subrecipient Written Agreements lists all the required Subrecipient Agreement components.

If you can answer **Yes** to all the questions in Section C, your HUD monitor should be able to answer **Yes**.



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Things change, stuff happens

"If an entity is in the midst of implementing activities under an existing agreement which only cites part 84 or part 85 requirements, the agreement must be amended ..."



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The Subrecipient Agreement

- √ Regulations change
- ✓ Scope of work changes
- ✓ Location of the activity changes especially if you are using area benefit to meet a national objective
- √ Timelines change
- ✓ Subrecipients have changes to key personnel
- √ Subrecipients need more funding and you're willing and able to provide it
- ✓ Subrecipient need to move funds between line items



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Amendments must be mutually agreeable.



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The Subrecipient Agreement

Put it in writing.



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Polling Question 4-1



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The Subrecipient Agreement

Polling Question 4-1 Answers

- 1. The Subrecipient Agreement may only contain the requirements specified in §570.503.
- 2. Uniform Requirements referred to in the Subrecipient Agreement refers to
- 3. Most Public Service activities require an extensive ERR...
- 4. The requirement to clearly identify federally-funded subawards...
- 5. HUD expects grantees to provide technical assistance to subrecipients...



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The Subrecipient Agreement

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I N C D A

Training Subrecipients

October 2020 NCDA

October

How does the program participant ensure that its CDBGfunded subrecipients understand how to apply and meet the CDBG program requirements to the activities that they are carrying out?

CPD Monitoring Handbook 6509.2 REV-7



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Training Subrecipients

Training and technical assistance cannot be twice-a-year events.



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- ➤ Chapter 4 of HUD's *Managing Subrecipients* handbook makes a distinction between
 - ■"orientation,"
 - "training" and
 - ■"technical assistance."



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Training Subrecipients

Another way of approaching the grantee's responsibility is to view training as **a continuum** that while encompassing HUD's three components, also includes additional tools for a well-equipped toolbox.



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Technical assistance and **monitoring** are not the same thing - **Technical assistance** is usually one-on-one consultation with subrecipient staff to assist with the day-to-day management of the subaward.

Monitoring is a formal process as established in the jurisdiction's monitoring plan involving an on-site visit or desk review.



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Training Subrecipients

Think like a teacher -

- > show the concept to the students;
- discuss the concept using real-life applications if possible;
- ➤ ask questions to be sure the students understand the concept; then
- > repeat the process if mastery has not been achieved.



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The Pre-Application Stage – Orientation Basic concepts to be mastered:

- ✓ What is the Community Development Block Grant
- ✓ How much funding is available For public services, a brief explanation of the cap
- ✓ Meeting a National Objective
- ✓ Eligible activities
- ✓ Record Keeping and Reporting
- ✓ Super Circular requirements including internal controls and financial management
- ✓ How to submit the application
- ✓ How the application is evaluated



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CDBG Subrecipient Training

✓ How much funding is available – For public services, a brief explanation of the cap

2015-16 Funding

2015-16 CDBG - \$742,567 × 15% \$111,385

2013-14 Program Income - \$102,326 × 15% 15,349

Total Available for Public Service Grants - \$126,734



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✓ Meeting a National Objective

Area Benefit

Service is available to all residents in a defined area - primarily residential - current census data indicates at least 51% of persons are LMI



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✓ Meeting a National Objective

Limited Clientele Activity

Service used by specific group of people and of that group at least 51% are LMI.



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✓ Meeting a National Objective

Three classes of L/M Limited Clientele Activities

- 1. Presumed Benefit
- 2. Nature and Location
- 3. Information on family size and income required



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✓ Meeting a National Objective

Presumed Benefit

Exclusively benefit a clientele presumed by HUD to be principally L/M income persons. Examples:

- Abused children
- Elderly persons
- Battered spouses
- Homeless persons



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✓ Meeting a National Objective

Nature and Location

Be of such nature and in such location that it may reasonably be concluded that the activity's clients will be primarily L/M income persons.



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✓ Meeting a National Objective

Information on family size and income required

Document that *at least 51%* of the clientele served are persons whose family income does not exceed the L/M income limit.



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Direct Benefit Reporting

Point of emphasis: These standards are minimums!



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CDBG Subrecipient Training

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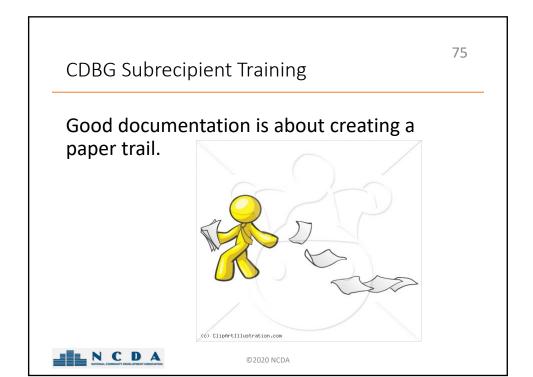
✓ Record Keeping and Reporting

Every CDBG subrecipient is required to establish and maintain at least three major categories of records:

- 1. Administrative Records
- 2. Financial Records
- 3. Activity/Case Files

The CDBG standard: records that are accurate, complete and orderly.





Be totally upfront with prospective subrecipients...

"If we fund you, there are a lot of hoops you will be expected to jump through...

starting with the fact that as soon as you sign the Subrecipient Agreement your organization becomes a non-federal entity subject to the same rules – 2 CFR 200 – as we are."



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✓ Super Circular requirements including internal controls and financial management

Non-Discrimination (§570.602 & 618)

Code of Ethics (Principle 1)

Conflict of Interest (§200.318 & §570.611)

Procurement (§200.318(a))

Grievance (Staff and Clients) §570.607(a)

Termination (Staff and Clients) §570.607(a)

Confidentiality (§200.303(e))
Record Retention (§570.506)
Information Technology (Principle 11)

Whistleblower (§200.300) Monitoring (§200.329)

If Housing Activities Involved:

- Fair Housing (§570.611)
- Lead-Based Paint (§570.608)



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Training Subrecipients

✓ How to submit the application....

Make it as clear as possible since the application itself is a measure of the applicant's capacity.

If the applicant can't follow instructions or submits an application that ignores the criteria you've made available for them, whether it can successfully administer a activity is a huge question mark.



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Prospective subrecipients may well need technical assistance just to get an application submitted.

Let these them know you stand ready to assist and make sure they know where to reach out for help.



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Training Subrecipients

The Post-Award Stage – Training Basic Concepts to be Mastered

- ✓ What is in the Subrecipient Agreement
- ✓ Documenting the activity
- ✓ Record Keeping
- ✓ Reporting
- ✓ Super Circular requirements including internal controls and financial management
- ✓ Availability of technical assistance and other resources



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Technical assistance can be provided in many ways:

- □ Telephone
- □ E-Mail
- □ Snail Mail
- ☐ Site Visit

The primary goal?

Head off trouble before it turns into a finding or worse.



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I. Scope of Service

This section describes the activity the City is partnering with you to provide. The information in this section is based on the information you provided in your grant application.

Does the Scope of Service described in your Subrecipient Agreement agree with your understanding of the activity you propose?



CDBG Subrecipient Training

SCOPE OF SERVICE

B. National Objectives

When your agency signs this agreement, you are certifying that your activity will meet a national objective.

You must be prepared to prove that assertion to the City and to HUD with tangible evidence.



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CDBG Subrecipient Training

SCOPE OF SERVICE

It is not unknown for an activity to evolve once it is underway. Sometimes this means a change to the scope of work.

The feds can be very, very, very, very picky sometimes. Sometimes things which logic suggests should be eligible expenses aren't.

Keep us in the loop! This is not one of those times where asking forgiveness is as good as asking permission. We can't always forgive you.



CDBG Subrecipient Training

BUDGET

The information in your subrecipient agreement was pulled from your application. Is the information still correct?



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PAYMENT

Is the amount shown in this section correct?

When or how often you submit invoices is up to the agency, but invoices should be submitted in a timely manner. This allows us to be sure your submissions comply with federal regulations and provide technical assistance should you have questions.



CDBG Subrecipient Training

You've documented that your project meets the national objective of providing a service to low- and moderate-income persons.

You've provided the services as specified in the Subrecipient Agreement.

You've submitted reports as required.



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CDBG Subrecipient Training

The Subrecipient wants its money...





CDBG Subrecipient Training

- ➤ Documentation to be submitted with an invoice depends on what CDBG is paying for.
 - Goods and services receipts notated with client name
 - Staff time time sheets. If CDBG activity is only part of job, time sheet must reflect how time is divided.



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CDBG Subrecipient Training

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Grantee Recognition

"The Subrecipient shall insure recognition of the role of the Grantee in providing services through this Agreement. All activities, facilities and items utilized pursuant to this Agreement shall be prominently labeled as to funding source."



CDBG Subrecipient Training

ADMINISTRATIVE REQUIREMENTS

Cost Principles

The Subrecipient shall administer its program in conformance with 2 CFR 200 Subpart E



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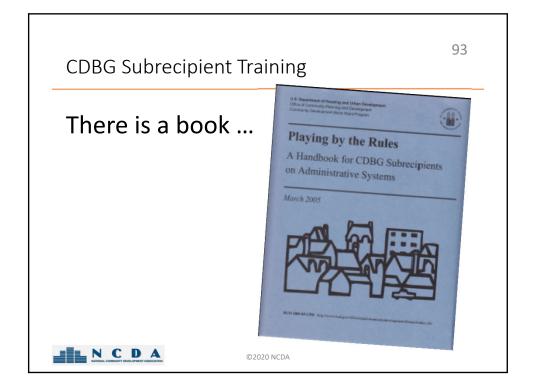
CDBG Subrecipient Training

> Record Retention

§570.502(a)(7)(ii) For subrecipients:

- (A) The retention period for individual CDBG activities shall be the longer of 3 years after the expiration or termination of the subrecipient agreement under §570.503, or 3 years after the submission of the annual performance and evaluation report, as prescribed in §91.520 of this title, in which the specific activity is reported on for the final time;
- (B) Records for individual activities subject to the reversion of assets provisions at §570.503(b)(7) or change of use provisions at §570.505 must be maintained for as long as those provisions continue to apply to the activity; and
- (C) Records for individual activities for which there are outstanding loan balances, other receivables, or contingent liabilities must be retained until such receivables or liabilities have been satisfied.





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The book is available in pdf format on the HUD website:

http://portal.hud.gov/hudportal/documents/huddoc?id= DOC 17104.pdf

CAUTION: While this guidebook provides a great deal of useful information, it was first published in 2005.

 Subrecipients must be warned that 2 CFR 200 supersedes all references to 24 CFR 84, 24 CFR 85, and all OMB circulars.



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PERSONNEL & PARTICIPANT CONDITIONS

Civil Rights

By signing the Subrecipient Agreement, your agency is agreeing to comply with all local, state and federal civil rights ordinances and laws and that it will not discriminate in hiring, contracting or providing services.



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CDBG Subrecipient Training

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FAIR HOUSING

Fair housing is not optional, it's the law!!!!!!!!





CDBG Subrecipient Training

FAIR HOUSING

The City needs the help of our subrecipients to educate the public about their rights under the Fair Housing Act.

Please visit the City website for more information or call us with questions.



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CDBG Subrecipient Training

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EEOC/AA Statement

"The Subrecipient will, in all solicitations or advertisements for employees placed by or on behalf of the Subrecipient, state that it is an Equal Opportunity or Affirmative Action employer."





CDBG entitlements and their subrecipients are under a Congressional microscope.



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Training Subrecipients

Congress is responsible for the annual CDBG allocation.

Recipients and subrecipients are not allowed to lobby, but nothing says they can't be advocates – and the strongest form of advocacy is good activities backed up by solid data.



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During training sessions, impress on subrecipients the importance of generating good data.

Gathering good data starts with setting realistic – and measurable – goals, hitting the benchmarks, then reporting accomplishments accurately.



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Training Subrecipients

Subrecipients also need to be asked this question during training and technical assistance sessions:

Are the CDBG dollars being invested in your program being used effectively?



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Don't forget the microscope.

We have to tell the CDBG story.



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Training Subrecipients

Have you ever been talking with a subrecipient and suddenly realized the look on their face says,

"I haven't got a clue what you're talking about."



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Practitioners know the shorthand, the specialized technical language and acronyms used by the experienced professional to talk with others in our field. Unless your subrecipients came out of the world of CDBG, they do not.



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Training Subrecipients

Your download package includes a glossary of terms with which subrecipients might not be familiar.

Help your partner out – share the list.



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Your download package also includes a comprehensive annotated bibliography of training resources and links to find and download.

The HUD monitor will want to know if the subrecipient has been made aware of resources specifically devoted to increasing its knowledge of the CDBG subrecipient process.



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QUESTIONS

Any questions?



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HOMEWORK



Go to the Downloads tab on you Personal Access Page and download Homework Assignment 4.

There are 10 questions based on our discussion of Training Subrecipients

Four choices for each question; pick the response that $\underline{\text{best}}$ answers the question.

Use any of the resource materials provided in your download package... including the list of links.

At the beginning of the next session we will discuss.



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Session 5

For Session 5, you will need:

- Slides
- Polling Questions for Session 5
- Homework Exercise 5
- CDBG IDIS Activity Setup Information template

These are all available under the Downloads tab on your Personal Access Page.



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MORE QUESTIONS?

If you have any questions between the end of today's session and our next session, send me an email:

johncallow@bellsouth.net



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