

CDBG Subrecipient Management – Online
Homework Assignment Two
The Super Circular – 2 CFR 200

1. Which of the following is not a characteristic of a CDBG subrecipient?
 - a) Uses Federal funds to carry out a program for a public purpose
 - b) Has responsibility for programmatic decision making.
 - c) Normally operates in a competitive environment
 - d) Determines who is eligible to receive what Federal assistance

2. I've been assigned a stack of applications for CDBG subawards and told to do pre-award assessments. My instructions state the criteria for my evaluations are in the rules. Where?
 - a) §200.330(a)
 - b) §200.331(a)
 - c) §200.331(b)
 - d) §200.331(d)

3. A prospective subrecipient tells us they don't have enough storage space to retain records for more than a year or two and would like us to give them a waiver. We tell them, "Sorry, we can't," and refer them to this rule.
 - a) §200.333
 - b) §570.502(a)(7)
 - c) §200.339(a)(2)
 - d) Your local jurisdiction's Record Retention Policy

4. From HUD's perspective, what is the difference between a **Recipient** and a **Grantee**?
 - a) Absolutely none. The terms are interchangeable.
 - b) A **Grantee** gets its money directly from HUD. A **Recipient** does not.
 - c) A **Grantee** can be a Pass-Through Entity. A **Recipient** cannot be a Pass-Through Entity.
 - d) A **Grantee** is a unit of local government. A **Recipient** is a state government.

5. An important difference between a contractor and a subrecipient is that grantees are not required to go through a competitive procurement process to select subrecipients.
 - a) True
 - b) False

6. One of our new subrecipients is complaining about the internal controls we're requiring them to implement, particularly a formal Procurement Policy. We've told them it's a federal rule. They want to know which one.
 - a) §200.338(a)
 - b) §200.324(a)
 - c) §200.321(a)
 - d) §200.318(a)

7. HUD has issued us a finding against because they say we're not in compliance with §200.303(e). What are they talking about?
- a) They don't think we did a good job following our monitoring plan.
 - b) They're not happy with the security measures we've implemented to protect personally identifiable information.
 - c) Who knows? Our monitor is a newbie who doesn't know the rules as well as we do.
 - d) All of the above
8. A small neighborhood association is a potential subrecipient. When asked about a financial system, they state that they have a volunteer treasurer, who keeps track of income and expenses on QuickBooks out of her home. What would you require of them to make their financial system acceptable?
- a) Go ahead and fund the activity with the understanding they'll have to make changes if they expect to be renewed next year,
 - b) Hire an accountant to do a single audit.
 - c) We're not sure they could do anything so we'll decline to fund.
 - d) Help them develop written policies and procedures, then make sure they follow them.
9. The same group wants to know why a group its size has to have a UEI number.
- (a) Because we say so.
 - (b) Because §200.32 says so.
 - (c) Because §570.503 says they have to.
 - (d) Because §200.333(a)(1)(i) requires it.
10. A very popular non-profit has applied for funds in a high priority category. They score enough points to be funded, but have a poor track record from last year's Subrecipient agreement. They didn't submit timely payment requests, and didn't expend all the funds. What do you do?
- a) You can require them to submit monthly payment requests, and add in a Subrecipient agreement provision that says if they fail to do so for so many months,
 - b) you can cancel the Subrecipient agreement and then monitor them;
 - c) You could refuse to work with them unless they have made the management changes necessary to improve performance.)
 - d) Any of the above