

CDBG Subrecipient Management – Online
Homework Assignment Six
Tracking Subrecipients

1. According to HUD, the majority of difficulties experienced by subrecipients can be attributed to...
 - a) Administrative Systems
 - b) Financial Management
 - c) Documentation and Record Keeping
 - d) All of the above

2. By rule, a subrecipient must have, at a minimum, which of the following policies?
 - a) Code of Ethics
 - b) Whistleblower Policy
 - c) Conflict of Interest Policy
 - d) Information Technology Policy

3. You've just visited a subrecipient's office and you observe that staff keeps confidential files in a file cabinet without a lock. Would you consider that a "reasonable measure to safeguard personally identifiable information"?
 - a) Yes
 - b) No
 - c) Maybe

4. During that visit, you asked to see your subrecipient's Chart of Accounts. They say don't have one because they just put all their income into a single checking account and write checks as needed. What, if anything, are you going to do about the situation?
 - a) Terminate the subrecipient agreement
 - b) Provide technical assistance and hope they can correct the situation
 - c) Issue a finding, provide technical assistance, and give them 30 days to remedy the situation
 - d) Don't worry. Be happy.

5. You have a subrecipient that provides literacy classes to migrant farm workers. The agency's financial person is on the phone asking how to report income on its clients since the clients are part of a presumed benefit class and the agency hasn't collected income information. You tell her to report the total number of clients as...
 - a) Extremely low income
 - b) Very low income
 - c) Low income
 - d) Moderate income

6. You require subrecipients to submit client demographic information once a quarter, regardless of whether there they are submitting a reimbursement request at the same time. There was a report due July 15. Now it's September 15th and one of your agencies still hasn't submitted its July 15 report. Should you consider this a matter of concern?
 - a) Yes
 - b) No
 - c) Maybe

7. Another subrecipient has been really good about getting its reports in on time, but its third-quarter report indicates it has only served about 10% of the number of clients specified in the Subrecipient Agreement Scope of Work. Should you consider this a matter of concern?
 - a) Yes
 - b) No
 - c) Maybe

8. A subrecipient complains because you have disallowed most of its latest reimbursement request. You tell the subrecipient you have taken this action because they are out of compliance with the budget agreed to in the Subrecipient Agreement. "We're calling HUD to complain," you are told. Does the subrecipient have a legitimate beef?
 - a) Yes
 - b) No
 - c) Maybe

9. We're ready to close out one of our subrecipient activities but we're confused. We looked in the regulations and see that 24 CFR 570 and 2 CFR 200 both address Closeout. Which one of the rules do we follow? Or do both apply?
 - a) Follow §570.509.
 - b) Follow §200.344.
 - c) Follow the provisions of both.
 - d) You read the rules wrong. Neither applies.

10. What, if any, responsibilities does a subrecipient have to a grantee if an activity has been closed?
 - a) None
 - b) To maintain records for 18 months after closeout.
 - c) The obligation to open files and their books.
 - d) To conduct a single audit if its federal expenditures during its most recent program year did not exceed \$500,000.