Problem Solving

<u>For Monitoring Covered by 2 CFR Part 200 Requirements</u>.

c. Is there evidence that the program participant has provided appropriate resource materials to its subrecipients (e.g., governing regulations, 2 CFR Part 200, CPD Notices, the *CDBG Program Guide to National Objectives & Eligible Activities for Entitlement Communities*, or corresponding websites) and keeps subrecipients abreast of program changes and new or revised requirements?	☐ ☐ ☐ **Yes No N/A**
Describe Basis for Conclusion:	

The jurisdiction has carefully crafted its policies for managing subrecipients, has established clear written procedures informed by all applicable Federal regulations, has involved the public as required by its Public participation plan, has provided technical assistance to the subrecipients as appropriate, and carefully monitored the subrecipient to be sure the training has been absorbed. What could possibly go wrong?

There is a reason the first required course at many graduate schools is Bibliography and Research. The key to developing a solid working knowledge in a field is knowing the resources available for finding the answers to questions and solving problems.

This link - https://www.hudexchange.info/ - is the key to the HUD library and is worth a bookmark.

Regulations

The CDBG rule, 24 CFR 570, is found at The *Electronic Code of Federal Regulations* website maintained by the National Archives. Federal rules found at ecfr.gov are updated daily.

https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570

The Consolidated Plan rule, 24 CFR 91, is found at The *Electronic Code of Federal Regulations* website maintained by the National Archives. The GPO pdf includes all revisions to the rule through 2008. The HUD Exchange pdf includes revisions through 2006.

https://www.ecfr.gov/current/title-24/subtitle-A/part-91

The Super Circular rule, 2 CFR 200, can be found at The *Electronic Code of Federal Regulations* website maintained by the National Archives.

https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

IDIS for Subrecipient Management

Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER

This manual provides step-by-step instructions – including copious screen shots for using the Consolidated Plan Template in IDIS Online. The discussions on the role of consultations and public input for determining priorities and setting goals is useful. The most recent revision was published in April 2016.

https://www.hudexchange.info/resources/documents/eCon-Planning-Suite-Desk-Guide-IDIS-Conplan-Action-Plan-Caper-Per.pdf

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eCon Planning Suite Citizen Participation and Consultation Toolkit

This toolkit provides strategies for grantees that would like to review and assess existing citizen participation and consultation practices and also provides tools to plan future outreach activities. The most recent version was published in June 2021.

https://www.hudexchange.info/programs/consolidated-plan/econ-planning-suite-citizen-participation-and-consultation-toolkit/

Matching Priority Needs with Activity Tool

HUD prepared this short (5 pages) tool to help grantees prioritize data found on Consolidated Plan Needs Assessment (NA) and Market Analysis (MA) screens.

https://www.hudexchange.info/resources/documents/Matching-Priority-Needs-with-Activity.pdf

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IDIS for CDBG Entitlement Communities - Training Manual and Slides

This manual provides step-by-step instructions for functions related to creating and editing projects and activities, funding, and drawdowns. The most recent version was published in October 2022.

https://www.hudexchange.info/resource/2685/idis-online-for-cdbg-entitlement-communities-training-manual/

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CDBG Activity Screen Shots in IDIS

This pdf allows the grantee to preview all the CDBG Activity screens without needing to log into IDIS. Can be used in conjunction with the CBBG IDIS Activity Setup Worksheet.
https://www.hudexchange.info/resources/documents/Screenshots-of-CDBG-Activity-Screens-In-IDIS.pdf

CDBG Matrix Codes – Matrix Code Definitions

In this 21-page publication, HUD defines all of its matrix codes including the new codes added in 2018. Appendix A of this manual is pulled from this publication, but only lists the matrix codes related to public services.

https://files.hudexchange.info/resources/documents/Matrix-Code-Definitions.pdf

Meeting National Objectives

CDBG Program Guide to National Objectives & Eligible Activities for Entitlement Communities

Also known as The CDBG Desk Guide, this guidebook has been available since February 2001 and remains the go-to book for interpreting the nuances of 24 CFR 570. Keep in mind references to OMB Circulars, Matrix Codes, and determining LMA service areas have been superseded.

https://www.hudexchange.info/resource/89/community-development-block-grant-program-cdbg-guide-to-national-objectives-and-eligible-activities-for-entitlement-communities/

Managing Subrecipients

How to Use CDBG for Public Service Activities

This tutorial introduced in 2017 is part of HUD's series of *How to Use CDBG* videos. The information, divided into four modules, offers a high-altitude overview of the topic.

1. Introduction to Public Service Activities (4:25)
2. Meeting and Documenting a National Objective (8:00)
3. Designing a Public Service Program (14:10)
4. Summary (1:13)

https://www.hudexchange.info/programs/cdbg/public-services/meeting-and-documenting.html

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Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight

This guidebook remains HUD's go-to for subrecipient management. The 2005 revision was finally replaced in February 2022. The link is for the guidebook landing page. The link for a pdf of the entire book is no longer live, but links to each chapter are.

https://www.hudexchange.info/resource/6577/managing-cdbg-guidebook-for-cdbg-grantees-on-subrecipient-oversight/

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Ensuring CDBG Subrecipient Timeliness: Guidelines for Grantee Selection, Management, and Oversight of Subrecipients in the Community Development Block Grant Program

HUD first published this handbook in 2005 to be used in conjunction with *Managing CBDG*. Part II offers practical advice for recognizing subrecipient timeliness issues and problem solving.

https://www.hudexchange.info/resources/documents/Ensuring-CDBG-Subrecipient-Timelines.pdf

Monitoring

https://www.hudexchange.info/resource/6944/notice-cpd-23-08-implementing-risk-analyses-for-monitoring-cpd-grant-programs-in-fy-2024/

This notice spells how the criteria HUD uses for determining who, when and how field staff will monitor grantees. Attachment A-1 lists factors to be rated and lists risk scores. Even though the title references FY 2024, the Notice remains in effect and will until it is "amended, superseded or rescinded.

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Evaluating Subrecipients to Optimize Performance

This short (12 pages) booklet offers guidance for grantees needing to evaluate subrecipient performance in terms of meeting goals and objectives.

https://www.hudexchange.info/resources/documents/Evaluating-Subrecipients-to-Optimize-Performance.pdf

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CPD Monitoring Handbook 6509.2 (Rev. 7)

This handbook covers the full range of Community & Planning programs with 36 chapters and more than 200 exhibits. The link below connects to a listing with links to WORD documents for each. *Exhibit 3-16* - *Guide for Review of Subrecipient/Community-Based Development Organization (CBDO) Management* covers the topics discussed in the NCDA Subrecipient Management training manual. REV-7 CHG-4, was released in June 2022, includes monitoring issues related to CDBG-CV and other CARES Act programs.

https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/cpd/6509.2

Subrecipient Training

Playing By The Rules: A Handbook for CDBG Subrecipients on Administrative Systems

HUD prepared this handbook, published in February 2022, specifically for subrecipients. The link for a pdf of the entire book is no longer live, but links to each chapter are.

https://www.hudexchange.info/resource/687/playing-by-the-rules-a-handbook-for-cdbg-subrecipients-on-administrative-systems/

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Training CDBG Subrecipients in Administrative Systems

HUD prepared this handbook in 2005 to provide grantees a plan for introducing subrecipients to *Playing By The Rules*. Dated, but still works.
https://www.hudexchange.info/resources/documents/Training-CDBG-Subrecipients-Administrative-Systems.pdf

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Lifelines

Sometimes a problem is so knotty, even the best reference books do little but further confuse the issues and the HUD field person will get back with you after checking with D.C. The CDBG program has been around long enough, though, that most problems have already been solved by someone, and most of those problem solvers are eager to share their solutions with other practitioners.

Two important NCDA membership benefits are access to the Online Forum and to the Document Archive. Both are accessed through the NCDA website: www.ncdaonline.org. Contact NCDA to obtain a User Name and Password.

And, finally, there is no substitute for developing a peer network. Some of the best problem solving occurs when practitioners work together to solve common problems..