

CDBG Subrecipient Management – Online  
Homework Assignment Four  
Training Subrecipients

You have just concluded your orientation session prior to accepting subrecipient applications for your next program year. You ask for questions... and the hands shoot up. What's the best answer for each of the following?

1. You said we have to have a UEI number. Why? We're a nonprofit, not a commercial entity.
  - a) You have a point. Write us a letter and we'll issue a waiver.
  - b) It's okay to substitute your CCR number.
  - c) All non-federal entities – and you'll be one if you take our money – are required to have a UEI number. See §200.332(b)(ii).
  - d) I can't tell you why – It's a military secret – but you have to.
2. You said we have to have a Procurement Policy. Why? If you decide to fund us, we don't plan to use your money for anything except paying staff salaries.
  - a) We'll give you a pass until you need to reallocate funds. We'll cross that bridge when we get there.
  - b) All non-federal entities – and you'll be one if you take our money – are required to have a Procurement Policy. See §200.318(a).
  - c) Not a problem. We know your board allows the executive director to make those decisions using her best judgement.
  - d) You have a point, Write us a letter and we'll issue a waiver.
3. Our proposed activity will provide adult day care for seniors with Alzheimer's or other forms of dementia. Will we need to collect income data on our clients?
  - a) Yes, and their caregivers, too.
  - b) Yes, and their Social Security numbers, too.
  - c) Yes, unless they're on Medicare.
  - d) No. Elderly is a Presumed Benefit category.
4. When you talked about gathering income data, you used some terms – ACS and AMI, for example – that I'm not familiar with.
  - a) You'll find both terms defined on the handout we've just given everyone.
  - b) Hmmm... you might want to Google them and anything else you don't understand.
  - c) Here's a phone number. It's long distance, but it will hook you up with HUD.
  - d) Wish I could help but I've forgotten what they mean.
5. We will be using some of our CDBG public service funds to purchase high-end computers and printers for an employment program. After the term of the contract, will we have to return the computers to the City?
  - a) That depends. Check the Scope of Work section of your Subrecipient Agreement.
  - b) That depends. Check the Reversion of Assets section of your Subrecipient Agreement.
  - c) That depends. Check the Termination section of your Subrecipient Agreement.
  - d) You can't do that. You can't buy equipment with CDBG Public Service money.

6. We will be having a fundraiser during the term of the agreement. One of our program participants will be giving a testimonial at the dinner. Are the proceeds considered program income?
  - a) Yes
  - b) No
  - c) Maybe
  - d) Probably
7. Our staff work on multiple programs. Is it OK to just estimate their time on this CDBG-funded project for the timecards?
  - a) Yes
  - b) No
  - c) Maybe
  - d) Probably
8. Our building is not handicapped accessible. Since its old, and we don't have funds to upgrade it, is that OK?
  - a) Yes
  - b) No
  - c) Maybe
  - d) Probably
9. We expect to have some expenses related to our activity that would occur before the beginning of your program year. Can we be reimbursed for those?
  - a) Yes
  - b) No
  - c) Maybe
  - d) Probably
10. There sure are a lot of hoops to jump through. What happens if you fund us but we run into trouble meeting your expectations?
  - a) Let us know whenever you need us to help. That's what technical assistance is all about.
  - b) Depends on what kind of trouble you're having. We might mutually decide it's best to terminate the Subrecipient Agreement.
  - c) Depending on how much trouble, we may send a grant manager to your office to conduct a formal monitoring.
  - d) Depending on what's going on with the subrecipient, any of the above might be the correct answer.