



# Subrecipient Program Monitoring Report Community Development Block Grant (CDBG) 24 CFR 570

*Subrecipient:* \_\_\_\_\_

*Sub Agreement/Ordinance No.:* \_\_\_\_\_

*Date of monitoring visit:* \_\_\_\_\_

*Program Monitor(s):* \_\_\_\_\_

*Financial Monitor:* \_\_\_\_\_

*Subrecipient Representative:* \_\_\_\_\_

**CDBG MONITORING VISIT REPORT**

	DATE COMPLETE	CD INITIAL
1. Subrecipient monitoring letter sent - certified mail		
2. Receipt of signed certified mail notice		
3. Review contract file		
4. Interview program representative		
5. Onsite review		
6. Exit conference		
7. Appendix A – included and complete		
8. Report letter prepared – certified mail		
A. Approval letter**		
B. Letter and finding(s) mailed**		
9. Subrecipient's response received		
10. CD approval of Subrecipient response (close out)		

\*\*Lapse time from line 6 to line 8a and 8b should not be longer than 30 working days.

Check one:

Desk Review     Onsite Visit

Contract Term: \_\_\_\_\_

Project Title: \_\_\_\_\_

Subrecipient Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone #: \_\_\_\_\_

Approved Date: \_\_\_\_\_      Approved Amount: \$ \_\_\_\_\_

Date of Last Expenditure Report: \_\_\_\_\_

\_\_\_\_\_  
Program Monitor's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Management's Review Signature

\_\_\_\_\_  
Date

**\*\*CDBG FINANCIAL MONITORING REPORT IS A SEPARATE DOCUMENT: APPENDIX A.**

	YES	NO	COMMENTS
<b>CONTRACT BENEFICIARIES/ NATIONAL OBJECTIVE/ ELIGIBILITY</b>			
^How many persons are currently being/were served?			
^Is this consistent with the contract?			
^Do clients meet a National Objective? If yes, which National Objective.			
^Are activities benefiting persons within Low-Mod Income category? If yes, please indicate below:			
<input type="checkbox"/> L/M Income Area Benefit			
<input type="checkbox"/> L/M Income Limited Clientele (circle applicable one)			
<ul style="list-style-type: none"> <li>▪ Presumed Benefit §570.208(a)(2)(i)(A)</li> <li>▪ 51% of clientele L/M §570.208(a)(2)(i)(B) and (C)</li> <li>▪ Nature and Location §570.208(a)(2)(i)(D)</li> <li>▪ Serving to remove material/architect. barriers for severely disabled §570.208(a)(2)(ii)</li> <li>▪ Limited Circumstance §570.208(a)(2)(iv)</li> </ul>			
<input type="checkbox"/> L/M Income Housing			
<input type="checkbox"/> L/M Income Jobs			
^What eligibility category does the project meet (570.201-6)?			
	YES	NO	COMMENTS
<b>CONTRACT REPORTING REQUIREMENTS</b>			
<b><i>PROGRAMMATIC</i></b>			
^Client Data Reports submitted in a timely manner? (circle each month submitted ) Explain.			
Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept			
^Client Summary Reports submitted in a timely manner? (circle each month submitted) Explain.			
Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept			
^Duplicate Client Data Report submitted in a timely manner? (circle each month submitted) Explain.			
Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept			
^For Economic Development projects, Employee Data Reports submitted in a timely manner? (circle each month submitted) Explain.			
Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept			

^Bi-Annual/ Annual Performance Reports submitted in a timely manner? (circle each submitted) Explain.			
<b>1<sup>st</sup> Six Months      2<sup>nd</sup> Six Months      Annual Performance Report</b>			
^Were the above submitted reports complete and accurate? Explain.			
Does the Subrecipient maintain these reports onsite for review?			
<b>FINANCIAL (programmatic)</b>			
^Request for Payment (and supporting documentation) submitted in a timely manner? (circle each month submitted) Explain.			
<b>Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept</b>			
^Time and Attendance Sheet submitted in a timely manner? (circle each month submitted) Explain.			
<b>Oct Nov Dec Jan Feb Mar Apr May June July Aug Sept</b>			
^Were the above submitted reports complete and accurate? Explain.			
Does the Subrecipient maintain these reports onsite for review?			
	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
<b>CONFORMANCE TO SUBRECIPIENT AGREEMENT</b>			
^Is the full scope of services listed in the Agreement being undertaken? List any deviation.			
^Compare actual accomplishments at the point of monitoring with planned accomplishments. Is the project achieving the expected levels of performance (number of persons served, number of units rehabbed, etc.) and reaching the intended client group? Explain any problem the subrecipient may be experiencing. Acknowledge major accomplishments.			
^Is the work being performed in a timely manner (i.e., meeting the schedule as shown in the Agreement)? Explain.			
^Compare actual expenditures versus planned expenditures. Do they match? Note any discrepancies or possible deviations.			
^Are requests for payment consistent with the level of work accomplished? Explain.			

Is program income properly accounted for and recorded? Explain.			
Does the project conform to any special terms and conditions included in the Subrecipient Agreement? Explain.			
	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
<b>ADMINISTRATIVE REQUIREMENTS</b>			
Does Subrecipient maintain personnel records for all persons paid with CDBG funds provided by COP CD? (Review 1099, W-2 and timesheet/payroll reports)			
Does Subrecipient have documentation stating it is an Equal Opportunity or Affirmative Action Employer? Note documentation reviewed.			
Is appropriate EEO and/or Fair Housing signage in place easily visible by employees and visitors?			
Does the Subrecipient accept all otherwise eligible clients regardless of race, ethnicity, age, gender, disability? Explain.			
Is documentation maintained ensuring compliance with faith-based organization, requirements? (if applicable) Note documentation reviewed and any discrepancies.			
Have any personnel employed in the administration of the CDBG-funded program been used for political activities, sectarian or religious activities, lobbying, political patronage, and nepotism activities? If yes, explain.			
Is Subrecipient operating program in compliance with OSHA requirements, if applicable? Note documentation reviewed.			
Does the Subrecipient have a Section 3 policy? (Applicable to construction projects) Review policy against HUD Section 3 clause.			
Is Subrecipient adhering to the "Section 3 Clause" of the HUD Act of 1968? (if applicable) Note any documentation reviewed and any deficiencies.			
Is documentation maintained for Conflict of Interest, if applicable? Note documentation reviewed or if N/A.			
Does Subrecipient have a copy of contract to reference?			

	YES	NO	COMMENTS
<b>PROGRAM MANAGEMENT AND RECORDKEEPING</b>			
Does the Subrecipient maintain an application file? Note documents included in file.			
Does the Subrecipient maintain a project file? Note documents included in file.			
Does the Subrecipient maintain client files? Note documents included in file.			
Does the Subrecipient maintain property files? <i>(if applicable)</i> Note documents included in file.			
Are files orderly, comprehensive, secured for confidentiality where necessary, and up-to-date? Note any areas of deficiency.			
Do the client files and subrecipient reporting records have the necessary documentation (supporting the National Objective being met, eligibility, and program costs) and do they agree? Note any deficiencies.			
Does the Subrecipient have a program procedure manual?			
Are there administrative policies and procedures in place? Note any deficiencies.			
Are there financial policies and procedures in place? Note any deficiencies.			
Are there programmatic and client policies and procedures in place? Note any deficiencies.			
Is there a file retention policy?			
If so, is it being adhered to? Explain.			
Does the record retention policy coincide with COP CD requirement of 5 years? Note length of time in policy.			
<i>Retain copies of pertinent documents for COP CD file</i>			
<b><i>Specific Records to Verify are being Maintained</i></b>			
Are records maintained describing each activity undertaken?			

Do records maintained demonstrate each activity undertaken meets a national objective?			
Are records maintained documenting participant income? <i>(if applicable)</i>			
Are records maintained documenting compliance with the fair housing and equal opportunity components of the CDBG Program? <i>(if applicable)</i>			
Are real property inventory records, which clearly identify properties purchased, improved, or sold, maintained? <i>(if applicable)</i>			
Are copies of monthly programmatic and financial reports submitted to COP CD retained? <i>See Contract Reporting Requirements above.</i>			
	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
<b>INSURANCE</b>			
^Has the subrecipient submitted a current copy of its Certificate of Insurance?			
^Is the City named as an additional insured?			
	<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
<b>EQUIPMENT AND REAL PROPERTY</b>			
^Has the Subrecipient acquired or improved any property it owns in whole or in part with CDBG funds in excess of \$25,000?			
If yes, review for 570.503(b)(7). Note any issues.			
^Has Subrecipient purchased equipment with CDBG funds in excess of \$1,000?			
If yes, does Subrecipient maintain the records required by 84.34?			
Has the Subrecipient disposed of equipment or property in the last 5 years that was purchased with CDBG funds?			
If yes, were proceeds for the sale reported as program income?			
^Did the City approve expenditures of program income?			
Was the program income returned to the City?			

	YES	NO	COMMENTS
<b>OTHER MONITORING AREAS</b>			
<input type="checkbox"/> <b>CONFIDENTIALITY</b>			
Are systems in place that ensure the confidentiality of persons provided services for family violence treatment prevention, homeless services, etc? Explain.			
<input type="checkbox"/> <b>TERMINATION OF PROGRAM ASSISTANCE</b>			
Is there a formal process in place that recognizes the rights of individuals receiving assistance to due process of law when terminating assistance? Explain.			
<input type="checkbox"/> <b>GRIEVANCE PROCEDURE</b>			
Does the Subrecipient maintain a formal complaint procedure as required by the agreement?			
Is this procedure in writing and does it comply with the COP CD Grievance Procedure requirements? Note any deficiencies.			
Are participants made aware of this procedure? Is it posted or is provided upon entry into the program? Specify.			
<input type="checkbox"/> <b>SECTION 504</b>			
Has the Subrecipient completed a Section 504 self-assessment (disability access)? Note discrepancies between what is known about the facility(ies) and what is noted in assessment.			
Does the facility where assistance/services are provided meet accessibility requirements of 24 CFR 8.21(c)(2)? Note deficiencies.			
<input type="checkbox"/> <b>LABOR STANDARDS</b>			
Were required labor standards requirements and guidance included in applicable subrecipient contracts?			
Were labor standards properly enforced? Review a sample of Davis Bacon payrolls, HUD-11 interview forms, Other Deductions forms, etc., to ensure adequate review was performed and any required restitution was paid. Note any discrepancies.			
<input type="checkbox"/> <b>GRANTOR RECOGNITION</b>			
Does the subrecipient maintain a "recognition file" as required by the subrecipient contract? Note documentation contained in file.			

Do program brochures/marketing materials recognize City Of Pasadena as a funding source? Explain.			
<input type="checkbox"/> <b>CONFLICT OF INTEREST</b>			
^Does the Subrecipient have a conflict of interest disclosure form filed with City of Pasadena?			
Does there appear to be any apparent or real conflict of interest <b>that has not been disclosed</b> by the subrecipient?			
<input type="checkbox"/> <b>PROGRAM CHANGES</b>			
^Have any significant changes been made to the program? ( <i>i.e. staff changes, budget revisions, scope of services</i> )			
Were changes approved by COP CD?			
Does Subrecipient maintain documentation of COP CD approval of applicable amendments/revisions to Subrecipient Agreement? ( <i>if applicable</i> ) Note documentation reviewed.			
**** Final Confirmation of Documentation			
Does supporting documentation exist in all files reviewed for each of the above questions? If not, please note.			

