



**Procedures for CDBG-DR Programmatic
Subrecipient Monitoring**
City of Detroit
Housing & Revitalization Department

Division(s)	Department Wide
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PURPOSE:

Per guidance and regulations from HUD, HRD will monitor all its subrecipients who received funding through CDBG-DR. The use of subrecipients increases the likelihood that the program could at some point experience compliance issues, and therefore monitoring is an effective tool to use to ensure subrecipients comply with all regulations governing their administrative, financial, and programmatic operations. In addition, it allows HRD to ensure that they are meeting performance objectives and that the budget and schedule are on track.

This policy specifically addresses the monitoring of administrative and program operations performed by HRD. The City of Detroit's Controller Office will monitor the financial operations.

SCHEDULED PROGRAM MONITORING:

Once a sub-recipient has been identified for an on-site program monitoring, a monitoring date is established with the sub-grantee (Subrecipient). A formal written letter is forwarded to the organization at least two (2) weeks prior to the scheduled visit (where possible), confirming the meeting date, purpose, as well as advising of specific documents, processes and areas subject to review. During this visit, staff will verify that the programs outlined in the contract scope are being carried out as described in the agreement, as well as review documentation, conduct interviews with staff, and complete site inspections. The HRD staff conducting the program monitoring shall inform the Subrecipient of any program findings and/or concerns within thirty (30) days after the conclusion of the monitoring visit.

UNSCHEDULED/SCHEDULED PROGRAM SITE VISIT(S):

Unscheduled Site Visit:

Staff performing an unscheduled site visit shall consult the Subrecipient's agreement to confirm the location and operating hours of the program. During this visit, staff will verify that the programs outlined in the Subrecipient scope are being carried out as described in the Subrecipient agreement. Program staff will review client and staff sign in sheets and confirm the program is operating within the Subrecipient's scope and budget. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government all unscheduled site visits will be deferred until the orders are lifted.

Scheduled Site Visit

Staff performing a scheduled site visit shall arrange a mutual date and time, by letter, with the Subrecipient at their program location. An entrance letter shall be sent by the project manager at least two weeks prior to the site visit outlining the documents and issues, and areas that will be reviewed. This visit will be scheduled during the normal operating hours of the Subrecipient to ensure the program is conducted during the hours as outlined in their proposal/scope of services. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government all scheduled visits will be conducted in accordance with those orders taking all health care precautions.

Desk Monitoring

Desk Monitoring is performed on each contract award to ensure the standards and requirements are met according to the Subrecipient agreement, department policy, and regulatory requirements. Assigned program managers complete a Desk Monitoring Review Checklist that includes reviews of support and reimbursement documentation, as well as Subrecipient policies outlined in the Subrecipient agreement. Feedback regarding Subrecipient operations are communicated through deficiency letters and other documentation, as needed. During any declared health emergency, pandemic or stay home/stay safe orders issued by the County, State, City or Federal Government the primary monitoring of Subrecipients shall be a desk monitoring.

RESOURCES:

<https://files.hudexchange.info/resources/documents/CDBG-Subrecipient-Oversight-Guidebook-Monitoring-Strategies-and-Procedures.pdf>