



Capacity Building & Monitoring Strategies for Subgrantee Oversight

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OKLAHOMA

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Capacity Building

CDBG Certified Grant Administrator Course

- ☐ Offered one time per year, usually in person.
- ☐ Must obtain at least 70% above on the exam.

CDBG Continuing Education Training

- ☐ Offered twice per year, in April and October.
- ☐ Grant administrators must attend at least one of two courses to maintain certification.
- ☐ May be in-person or virtual.



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Capacity Building: Risk Assessment Strategy



Grant Administration Key Risk Factors



Is the grant administrator CDBG certified?



How many years has the grant administrator been CDBG certified?



Has the grant administrator administered a contract in the past 2 years?



Has the grant administrator had any CDBG contracts de-obligated?

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Capacity Building: Risk Assessment Strategy


Financial Performance Key Risk Factors


- Were there findings in the last audit?
- Unresolved findings or exceptions from prior years?
- Changes in key financial staff?
- Has the subgrantee received other Federal funds for this project?


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Capacity Building: Risk Assessment Strategy


Programmatic Performance Key Risk Factors


 Adequate staff/capacity to carry out goals in OKGrants?

 Changes in key program staff?

 Was the 120-day requirement met?

 Was the 270-day requirement met?

 Did the previous contract require a contract extension?

 Were there findings in the last monitoring?

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Capacity Building: Risk Assessment Strategy

Performed after award to determine the level of risk associated with each subgrantee.

High	65-78	On-site Monitoring Required and Technical Assistance Required
Average	41-64	Monitoring – On-site or Desk
Low	25-40	Monitoring Waived

Technical Assistance Training should be required for all new subgrantees regardless of points scored on the Risk Assessment.

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Capacity Building

Technical Assistance Priorities

- At a minimum, the Authorized Official, Financial Officer, and Grant Administrator should be required to attend.
- Training is usually conducted in person if possible.
- Focuses on common issues and key compliance measures.

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What does your subgrantee need to be successful?

- ☐ Adequate Resources
- ☐ Special Grant Conditions
- ☐ Bi-weekly Meetings
- ☐ One on One TA's

Capacity Building

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Future Outlook



CDBG Online Certification



Current training is only offered once per year, we are looking for other flexible ways to provide training.



Improve Subgrantee/Grant Administrator Performance.



Poor performance by subgrantees creates more work on internal staff and potential compliance issues.

Monitoring

Why Monitor?

Mandated by federal regulation (2 CFR 200 & 24 CFR 570).



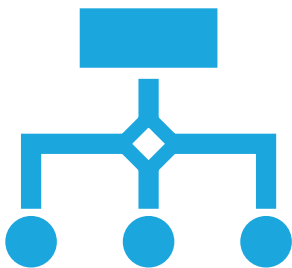
Avoid non-compliance issues. Protects you and the subgrantee.



Assist communities in delivering viable projects now and in the future.

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Subgrantee Monitoring



Develop a Process

- ✓ What methods will be used to guide your monitoring process?
- ✓ What information will you review when monitoring?
- ✓ Will you have a process for pre-monitoring?
- ✓ Do you have any past experiences that will help guide future monitoring?
- ✓ What will trigger a monitoring visit?
- ✓ How often will you monitor?
- ✓ What type of monitoring?

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Developing A Process

What will guide your processes?

- ☐ Use your Policy and Procedures to build a foundation.

Does your subgrantee have the necessary tools and resources?

- ☐ Your policies and procedures should be clear and unsurprising by the time you are ready to monitor your subgrantee.

Have the policies and procedures been communicated well?

- ☐ Technical Assistance Training
- ☐ Build Rapport- Is your subgrantee comfortable asking questions?

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Developing A Process

Who would benefit from a monitoring visit early on?

- New subgrantees
- New program activity
- Multiple types of activities

What types of activities can be monitored later?

- Remaining construction activities (i.e., payrolls, Section 3)

How often will you monitor and when?

- Monthly (Pre-monitoring)
- Quarterly
- Annually
- % Expended (i.e., 50%-65%)

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Developing Your Strategy

What other factors may trigger monitoring?

- Risk Assessment
- Performance-based (e.g., poor performers)

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Developing A Process

Develop a monitoring checklist and share it with your subgrantee before the monitoring visit.

- The checklist should identify the needs of your monitoring:
 - ✓ Contract Development and Management
 - ✓ Specific Program Guidelines
 - ✓ Environmental Review
 - ✓ Procurement
 - ✓ Labor Standards
 - ✓ Monitoring
 - ✓ Closeout

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Developing A Process

Identify the type of monitoring

- ☐ On-site vs. desk monitoring review.

Determine who needs to be in the room

- ☐ Authorized Official
- ☐ Grant Administrator
- ☐ Financial Officer

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MONITORING VISIT

Notify	Notify your subgrantee of the monitoring visit and allow enough time for them to prepare for monitoring.
Conduct	Conduct an entrance conference to include impacted parties such as the Authorized Official and Grant Administrator.
Begin	Begin the review process to include any information tied to the project (e.g., contract development procurement, environmental review, etc.,)
Conduct	Conduct an exit conference to provide praise and/or discuss issues.
Develop	Develop a monitoring letter.

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MONITORING RESULTS

Concern(s)

A concern is a weakness in your subgrantees' operations or performance that, if not addressed, may become a finding in the future. You can request that your subgrantee provide a written response to concerns, but it is not required.

Finding(s)

A finding is a material deficiency in your subgrantees' operations or program performance that is a violation of statute, regulation, or program requirements.

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How to Address Findings

A Finding must be:

Clearly and correctly identified in your monitoring letter.

Based upon an applicable law, regulation, or program policy. In other words, supported by facts.

Remember: This should be supported by your policy and procedure manual.

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How to Address Findings

Provide	Allow	Develop
Provide the required corrective action and establish deadlines for the implementation of the required action.	Allow your subgrantee time to respond.	Develop a plan for continued noncompliance or failure to implement required corrective actions (i.e., special grant conditions, bi-weekly meetings, technical assistance, etc.).

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Things to Consider

Monitor early and often to catch small problems before they become bigger issues.

Recognize areas for improvement by focusing on **Concerns**.

Give praise where necessary. If your subgrantee is doing well, provide recognition.

Identify high-risk subgrantees.

Always view the monitoring process as a learning experience for you and the subgrantee. Remember it's not a "**gotcha**" moment but an opportunity to educate for future success.

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