

Guide for Review of S+C Subrecipient Management			
Name of Grantee:			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: The purpose of this Exhibit is to review the S+C grantee's ability to monitor the day-to-day operations of subrecipients for compliance with applicable Federal requirements and achievement of performance goals identified in the approved grant agreement. Note that 24 CFR 582.400(a) provides that, under the grant agreement, the recipient is responsible for the overall administration of the program, including overseeing any subrecipients or contractors. For the S+C/SRO component, the subcontract is with a Public Housing Authority. For the S+C/SRA component, the contract is with the nonprofit organization.

Questions:

1.

Describe the grantee's procedures for selecting subrecipients pursuant to 24 CFR 582.400 and 24 CFR 582.300(d)(2-3). (Attach copies of written procedures, if available and as applicable.)
Describe Basis for Conclusion:

2.

Does the grantee have a management system for the oversight of its subrecipients? (If "yes," briefly describe below and, if written, attach a copy of relevant portions, as appropriate.) [24 CFR 84.51 for Non-Profit Organizations OR 24 CFR 85.40 for Units of Local Governments; 24 CFR 582.400 and the S+C Grant Agreement]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

Exhibit 12-5
Shelter Plus Care (S+C) Program

3.

Has the grantee executed written agreements with its subrecipients to carry out activities proposed in the approved grant agreement? [24 CFR 84.5 for nonprofits; 24 CFR 85.5 for units of local government]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

4.

Does the grantee have a system or method for amending subrecipient agreements? [24 CFR 582.405, <i>Program changes</i>]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

5.

Does the grantee review subrecipients for evidence of conflicts of interest either between the grantee and the subrecipients <u>or</u> between the subrecipients and their contractors? [24 CFR 582.340(b)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

6.

Does the grantee have a tracking system or other method of documenting the receipt of quarterly and Annual Progress Reports (APRs) from its subrecipients? [24 CFR 84.51 for Non-Profit Organizations OR 24 CFR 85.40 for Units of Local Governments]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

7.

<p>Does the grantee have a tracking system or other method of documenting the need for, and actual submission of, subrecipient audits? [24 CFR 84.51 for Non-profit organizations OR 24 CFR 85.40 Units of Government]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

8.

<p>a. Does the grantee have a method of determining the need for subrecipient on-site or remote monitoring reviews? [24 CFR 84.51 for Non-profit organizations OR 24 CFR 85.40 Units of Government]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

<p>b. Does the grantee analyze subrecipient performance in assessing compliance monitoring review needs? [24 CFR 84.51 for Non-profit organizations OR 24 CFR 85.40 Units of Government]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

9.

<p>If the grantee uses a risk analysis process for conducting compliance monitoring reviews of its subrecipients, is there evidence that the grantee carries out such reviews in accordance with its own risk analysis process or system? [24 CFR 84.51 for Non-profit organizations OR 24 CFR 85.40 Units of Government]</p>	<p><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A</p>
<p>Describe Basis for Conclusion:</p>	

10.

Is there documentation reflecting that the grantee takes appropriate and necessary follow-up actions to address subrecipient monitoring conclusions and findings? [24 CFR 84.51 for Non-profit organizations OR 24 CFR 85.40 Units of Government]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

11.

For SPC projects involving new construction or rehab activities, does the grantee have a tracking system to document the subgrantees' submissions of the Section 3 reporting requirements? [2008 NOFA section I.C.12.c.]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

12.

a. Has the recipient reviewed the procedures it intends to use to make known the availability of the program to determine whether they are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or handicap who may qualify for assistance? [24 CFR 582.330(c)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

b. Has the recipient established additional procedures that will ensure that interested persons of the particular race, color, religion, sex, age, national origin, familial status, or handicap groups identified under "a" above can obtain information concerning the assistance? [24 CFR 582.330(c)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

13.

Is there evidence of the recipient's adoption and implementation of procedures to make available information on the existence and locations of facilities and services that are accessible to persons with a handicap? [24 CFR 582.330(c)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			