

Guide for Review of HPRP Subgrantee Management			
Name of Grantee:			
Staff Consulted:			
Program Year:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, Consolidated Plan/IDIS, 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: This Exhibit is designed to review the HPRP grantee's management and oversight of its subgrantees. It is separated into two sections (Subgrantee Program Management and Subgrantee Financial Management). HUD reviewers should select a sample of subgrantees for a program year following the instructions for sampling in Section 8-3.C of the introductory text to this Chapter. The information in the file documentation, supplemented with grantee and subgrantee staff interviews, is to be used to answer the questions below. If the monitoring is on-site and time and resources permit, HUD reviewers should supplement this review with on-site subgrantee visits.

Questions:

A. SUBGRANTEE PROGRAM MANAGEMENT

1.

Did the grantee select subgrantees in accordance with 24 CFR part 85, and the grantee's plan for distribution, administration, and oversight of funds identified in its Substantial Amendment to the Consolidated Plan 2008 Action Plan for HPRP? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.37]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

Homelessness Prevention and Rapid Re-Housing Program (HPRP)

2.

<p>Has the grantee executed written agreements with subgrantees to carry out the activities proposed in the grantee’s approved Substantial Amendment to the Consolidated Plan 2008 Annual Action Plan for HPRP? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.37]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

3.

<p>Does a review of the subgrantee written agreements show that the agreements contain sufficient information regarding the subgrantees’ assigned HPRP activities to enable the grantee to conduct effective compliance monitoring reviews? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.40(a)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

4.

<p>Does the grantee have procedures in place to monitor the subgrantees’ submission of information required for the Quarterly and Annual Performance Reports? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, and Section VI. Reporting Requirements (C) Performance Reports]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

5.

<p>Is there evidence that the grantee has procedures in place for ensuring that their subgrantees are compliant with the HPRP confidentiality requirements for participants? [HPRP Notice – Section V. Post-Award Process Requirements (D) Confidentiality, (F) Responsibility for Grant Administration]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

6.

If the grantee conducts risk assessments of its subgrantees, is there evidence to show that the grantee performs compliance monitoring reviews in accordance with the risk assessment results? (If the grantee does not conduct a risk assessment, provide a brief narrative regarding its monitoring selection procedures.) [HPRP Notice – Section V. Post-Award Process Requirements (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.40(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

7.

If monitoring discloses subgrantee deficiencies, does the grantee take appropriate and necessary follow-up actions to ensure that corrective actions are taken by its subgrantees? [HPRP Notice – Section V. Post-Award Process Requirements (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.40]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

8.

Does the grantee have a method for verifying the accuracy and confidentiality of the participants’ data in the Continuum of Care (CoC) HMIS system or other centralized intake system, and other documents maintained by the subgrantees? [HPRP Notice – Section V. Post-Award Process Requirements (D) Confidentiality (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, and 24 CFR 85.40(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

9.

Does the grantee have a method for verifying that participant data is being submitted into the CoC HMIS system or other centralized intake system? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VI. Reporting Requirements (B) HMIS and Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 85.40(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion: 			

B. SUBGRANTEE FINANCIAL MANAGEMENT

10.

<p>As a condition for reimbursement of HPRP expenses to subgrantees, does the grantee require, and receive, documentation from its subgrantees sufficient to ensure that payments are for eligible, actual and incurred expenditures? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.21, 85.20 and 24 CFR 85.37]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

11.

<p>Does the grantee have procedures for determining subgrantee compliance with applicable program regulations regarding record retention and fiscal management requirements? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.21, 84.53, 85.20, 85.40(a), and 85.42]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

12.

<p>Does the grantee have a tracking system or other method of documenting the need for, and actual submission of, subgrantee audits required under OMB Circular A-133? [HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.26, 85.26, 85.40(a)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

13.

<p>Does the grantee have a tracking system or other method of documenting subgrantee compliance regarding procurement and/or subcontracting requirements? (If the response is “NO,” this may warrant further review using Exhibit 9-10 of this Handbook as a guide.)</p> <p>[HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.40-84.48, 85.36, 85.40(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

14.

<p>Does the grantee ensure that subgrantees maintain adequate records for property and assets acquired with grant funds? (If response is NO, this may warrant further review using Exhibit 9-11 of this Handbook as a guide.)</p> <p>[HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.34(f), 85.32(d), 85.40(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

15.

<p>Is there evidence that the grantee has safeguards for preventing loss, damage, or theft of subgrantee-held property?</p> <p>[HPRP Notice – Section V. Post-Award Process Requirements (F) Responsibility for Grant Administration, (I) Monitoring, Section VII. Other Federal Requirements (G) Uniform Administrative Requirements, 24 CFR 84.5, 84.34(f), 85.32(d), 85.40(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	