

# **ICDBG IMPLEMENTATION TRAINING FOR GRANTEES**

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## **HUD Monitoring & Corrective Actions**



# HUD MONITORING

## Purpose of HUD Monitoring Review:

- ❖ Compliance with Regulations / Grant Agreement
- ❖ Carried out activities as described in application
- ❖ Made substantial progress
- ❖ Continuing capacity to complete activities timely
- ❖ Capacity to undertake specific planned activities
- ❖ Monitoring findings, audits, corrective actions
- ❖ Enforcement actions, complaints, correspondence



# HUD MONITORING: AREAS OF REVIEW

1. Procurement and Contract Administration
2. Relocation – if applicable
3. Lead Based Paint – if applicable
4. Sub-recipient Agreements
5. Environmental Review
6. Compliance with approved grant application activities
7. Financial Systems Expenditure Report
8. Force Account compliance
9. Citizen Participation review



# HUD MONITORING: AREAS OF REVIEW (cont.)

- 10. Housing Rehabilitation Requirements – Cost limits, adopted policies, standards, expenditures review compared to cost summary
- 11. Land Acquisition – Financial Commitment for future project (within two years)
- 12. New Housing – CBDO Implementation, adopted construction standards
- 13. Public Facilities / Improvement – Was an M&O Plan adopted, adhered to, in compliance with NOFO
- 14. Program Progress – Implementation Schedule



# CORRECTIVE ACTIONS: CONTRIBUTING FACTORS

- Failure to comply with program requirements
- Failure to substantially carry out activities described in application
- Failure to make substantial progress toward carrying out approved activities
- Failure to show continued capacity to timely carry out approved activities





# CORRECTIVE ACTIONS: POTENTIAL ACTIONS

- Require progress reports
- Issue letter of warning:
  - ❖ Describing deficiencies
  - ❖ Identifying corrective actions
  - ❖ Describing more serious actions if deficiencies are not corrected
- Require the suspension of affected activities
- Require the reprogramming of remaining funds
- Require program reimbursement
- Change payment method
- Suspend LOCCS access



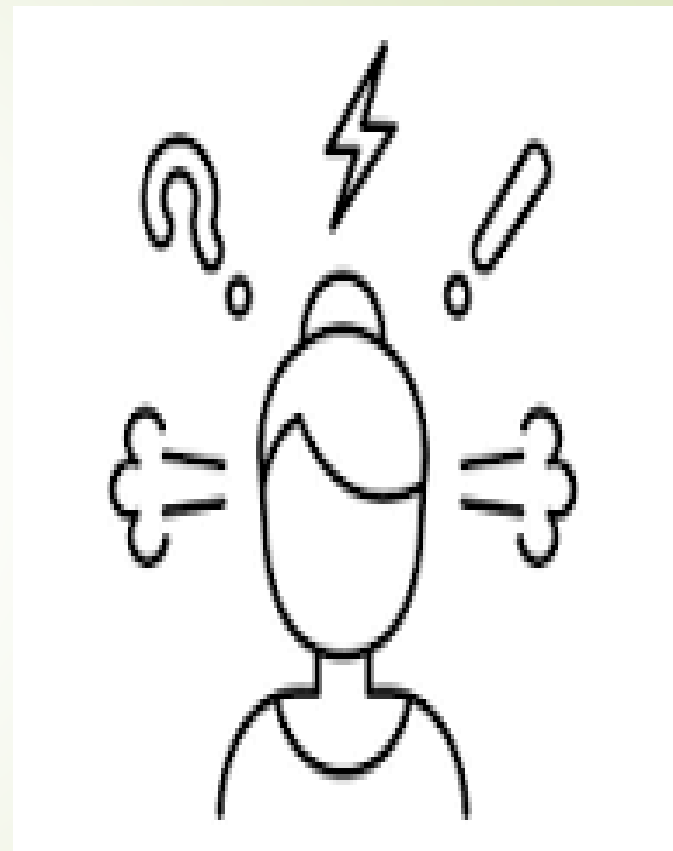
# CORRECTIVE ACTIONS: POTENTIAL ACTIONS (cont.)

- Reduction/withdrawal of grant
  - ❖ Requires opportunity for informal consultation
  - ❖ Exempts funds already expended on eligible activities
  
- Secretarial actions
  - ❖ Terminate or reduce grant
  - ❖ Limit availability of funds
  - ❖ Refer to Attorney General for possible civil action
  - ❖ Require opportunity for formal hearing



# OVERWHELMED?!? NEED HELP???

- **Contact your Area ONAP**
- Your GMS is here to help guide you towards solutions & understanding
- Additional Training & Technical Assistance may also be available



[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/codetalk/training](https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/training)





# HUD CONTACTS: AREA ONAP POCs

All Area ONAP Offices and Contact Information are listed on HUD.gov:

[ONAP and Tribe Contacts.pdf](#)

**Bookmark this link** on your computer so you have a quick and easy way to reach-out for help or guidance going forward



**QUESTIONS?**

*thank you*

