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I. Purpose				
The purpose of this review is to determine the recipient’s compliance with the applicable requirements of the federal program. This includes recipients of IHBG, ICDBG, ROSS, and RHED/RIF grants, and recipients of federal funding, as defined in 24 CFR Parts 84 and 85. The RHED/RIF and ROSS Grant Agreements also contain pertinent federal requirements for recipients and subrecipients.	24 CFR Part 1000 24 CFR Part 1003 24 CFR Part 964 2 CFR Part 200	ICDBG, RHED/RIF, and ROSS NOFA for year grant funded. RHED/RIF and ROSS Grant Agreements		
General notes: <ul style="list-style-type: none"> • For purposes of this review, the terms subrecipient and subgrantee are to be used interchangeably. • Some judgment calls can be made on the level of review and whether any review needs to be performed on activities. The reviewer should discuss the level of review required with the Supervisor. 	2 CFR 200.93			



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II. Subrecipient Requirements				
A. All programs.				
1. Unless sections of this Part specifically exclude a subrecipient from coverage, subrecipients under this Part include:	2 CFR 200.330			
a. Institutions of higher education,				
b. Hospitals,				
c. Commercial organization and international organizations operating domestically, or				
d. Other nonprofit organization.				
2. All subrecipient agreements must comply with the applicable provisions of this Part.	2 CFR 200.330(b)	Program Guidance 2007-06 (TDHE)		
3. Before disbursing any funds to a subrecipient, the recipient is to enter into a written subrecipient agreement with the subrecipient.	2 CFR 200.331 24 CFR 1003.502 (a) & (b)			



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4. The subrecipient agreement shall remain in effect during any period that the subrecipient has control over HUD funds, including program income.				
5. The recipient is responsible to ensure that every subrecipient agreement:				
a. With certain exceptions, includes a provision for compliance with 2 CFR Part 200.	2 CFR 200.331(a)(2)			
b. Includes any clauses required by federal statute and executive orders and their implementing regulations.	2 CFR 200.331(a)(2)			
6. The recipient is responsible to ensure that subrecipients are aware of all statutory and regulatory requirements.	2 CFR 200.331(a)(2)			
7. The recipient is responsible to ensure that subrecipients comply with the contract provisions.	2 CFR 200.331(e)			



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B. Indian Community Development Block Grant (ICDBG)				
1. HUD will judge performance based upon whether the recipient achieves the agreed-upon activities within grant time limits and within budget and whether the recipient has produced tangible results through the execution of grant activities.				
2. The ICDBG NOFA for the appropriate year of funding will be used in the review. 2003 NOFA: http://archives.hud.gov/funding/2003/other/icdbg.pdf 2004 NOFA: http://edocket.access.gpo.gov/2004/04-22576.htm 2005 NOFA: http://archives.hud.gov/funding/2005/grpicdbg.cfm 2006 NOFA: http://archives.hud.gov/funding/2006/grpicdbg.cfm 2007 NOFA: http://archives.hud.gov/funding/2007/grpicdbg.cfm 2008 NOFA: http://archives.hud.gov/funding/2008/grpicdbg.cfm 2009 NOFA: http://archives.hud.gov/funding/2009/grpicdbg.cfm 2010 NOFA: http://archives.hud.gov/funding/2010/grpicdbg.cfm				



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<p>2011 NOFA: http://archives.hud.gov/funding/2011/grpicdbg.cfm 2012 NOFA: http://portal.hud.gov/hudportal/documents/huddoc?id=2012icdbgnofa.pdf 2013 NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa13/icdbg 2014 NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa14/icdbg 2015 Mold NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa2015/icdbgmold 2015 NOFA http://nwiha.org/wp-content/uploads/2015/09/FY-2015-ICDBG-NOFA-Changes-9.21.15-2.pdf 2016 NOFA https://www.hud.gov/sites/documents/2016ICDBG-NOFA.PDF 2017 NOFA https://www.hud.gov/sites/documents/2017ICDBGNOFA_MOD.PDF 2018 NOFA https://www.hud.gov/sites/dfiles/PIH/documents/FR-6200-N-23_FY18_ICDBG_NOFA.pdf</p>				



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2019 NOFA https://www.grants.gov/web/grants/view-opportunity.html?oppId=322606				
3. The subrecipient agreement, at a minimum, shall include provisions for:	24 CFR 1003.502(b)			
a. Statement of work	24 CFR 1003.502(b)(1)			
b. Records and reports	24 CFR 1003.502(b)(2)			
c. Program income	24 CFR 1003.502(b)(3)			
d. Uniform administrative requirements	24 CFR 1003.502(b)(4)			
e. Other program requirements	24 CFR 1003.502(b)(5)			
f. Conditions for religious organizations	24 CFR 1003.502(b)(6)			
g. Suspension and termination	24 CFR 1003.502(b)(7)			
h. Reversion of assets.	24 CFR 1003.502(b)(8)			



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4. Are revisions to the subrecipient agreement necessary?				
C. Resident Opportunities and Self Sufficiency (ROSS) and Rural Housing and Economic Development/Rural Innovation Fund (RHED/RIF)		ROSS and RHED/RIF Grant Agreements		
1. HUD will judge performance based upon whether the recipient:				
a. Completes the approved activities within grant time limits and within budget, and				
b. Produced tangible results through the execution of grant activities.				
2. The ROSS NOFA for the appropriate year of funding will be used in the review. 2003 NOFA: http://archives.hud.gov/funding/2003/grpross.cfm 2004 NOFA: http://archives.hud.gov/funding/2004/grpross.cfm 2005 NOFA: http://archives.hud.gov/funding/2005/grpross.cfm 2006 NOFA: http://archives.hud.gov/funding/2006/grpross.cfm 2007 NOFA:				



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<p>http://archives.hud.gov/funding/2007/grpross.cfm 2008 NOFA: http://archives.hud.gov/funding/2008/grpross.cfm 2009 NOFA: http://archives.hud.gov/funding/2009/grpross.cfm 2010 NOFA: http://www.hud.gov/offices/adm/grants/nofa10/grpross-sc.cfm and http://www.hud.gov/offices/adm/grants/nofa10/grpphfs.s.cfm 2011 NOFA: http://archives.hud.gov/funding/2011/grpphfs.cfm and http://archives.hud.gov/funding/2011/grpross-sc.cfm 2012 NOFA: http://archives.hud.gov/funding/2012/grpross-sc.cfm 2013 NOFA http://portal.hud.gov/hudportal/documents/huddoc?id=2013ross-sc-nofa.pdf 2014 NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa14/ross-sc 2015 NOFA http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/fundsavail/nofa2015/ross-sc 2016 NOFA https://www.hud.gov/sites/documents/2016ROSSNOFA.PDF</p>				



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<p>The RHED/RIF NOFA for the appropriate year of funding will be used in the review.</p> <p>2003 NOFA: http://archives.hud.gov/funding/2003/grprural.cfm</p> <p>2004 NOFA: http://www.novoco.com/low_income_housing/resource_files/hud_data/FedReg_042304.pdf</p> <p>2005 NOFA: http://archives.hud.gov/funding/2005/grprhed.cfm</p> <p>2006 NOFA: http://archives.hud.gov/funding/2006/grprhed.cfm</p> <p>2007 NOFA: http://archives.hud.gov/funding/2007/grprhed.cfm</p> <p>2008 NOFA: http://edocket.access.gpo.gov/2008/E8-9273.htm</p> <p>2009 NOFA: http://archives.hud.gov/funding/2009/grprhed.cfm</p> <p>2010 Rural Innovation Fund NOFA: http://www.hud.gov/offices/adm/grants/nofa10/rural-innov.cfm</p>				
II. Pre-site Visit Preparation				
A. Identify whether the recipient has entered into subrecipient agreements with others.				
B. In on-site visit notification letter:				



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1. Inform the recipient that ONAP will be monitoring its subrecipient(s).				
2. Request any copy(s) of the executed subrecipient agreement(s) if applicable.				
3. Request any policies and procedures that the subrecipient(s) has developed.				
C. Review the sampling methods in the General Instructions. (The review will be conducted both at the recipient's office and the subrecipient's office).				
D. If available before going on site, review the following as they pertain to subrecipient monitoring: <ol style="list-style-type: none"> 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Recipient's policies and procedures (see section III for review instructions) 3. Previous monitoring findings and corrective actions status for findings 4. Previous self-monitoring report(s) 5. Previous financial and OIG audit findings, work papers, and management plan status for findings 6. Previous and current enforcement actions 				



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7. Valid complaints 8. Relevant correspondence				
IV. On-site Recipient Review				
A. Undisclosed subrecipient				
1. During the review, it may become evident that the recipient does in fact have a relationship that should be considered a subrecipient, which may not have been known beforehand.				
2. If this is the case, contact the Supervisor to determine if this subrecipient should be reviewed.				
3. In the event that a lower level subrecipient exists, the entity must be included in the subrecipient agreement.				
4. If the recipient has been designated high risk, review the condition(s) placed on the grant and verify that the subrecipient is complying with the conditions.				
B. Review the attached Subrecipient Monitoring Checklist.		Subrecipient Monitoring Checklist		



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1. Determine which statutory/regulatory actions remain the responsibility of the recipient and which are assumed by the subrecipient.				
2. At a minimum, review useful life (for IHBG) and procurement.	24 CFR 1000.142 2 CFR 200.318	Program Guidance 2007-07		
C. For the IHBG program, does the subrecipient agreement identify any activities that have not been determined compliant in the recipient's IHP(s) of record?				
D. Determine whether the subrecipient is using the recipient's policies and procedures in the implementation of program activities or if it has developed its own policies and procedures.				
E. If it has developed its own policies and procedures:				
1. Is this stated in the agreement?				
2. The subrecipient agreement must state that the subrecipient is allowed to develop its own policies and procedures.				
3. determine whether the policies and procedures are compliant with program requirements.				



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F. The recipient is required to monitor its subrecipient(s). If it hasn't, this is a finding.		Program Guidance 2007-06		
V. On-site Subrecipient Review				
A. Review the attached Subrecipient Monitoring Checklist to determine the program areas to be reviewed for each subrecipient.		Subrecipient Monitoring Checklist		
B. Is the subrecipient agreement(s) adequate?				
C. Is the subrecipient in compliance with the provisions of the subrecipient agreement?				
D. Is the subrecipient in compliance with program requirements for the areas it has assumed responsibility for under the subrecipient agreement, such as:				
1. Completion of required environmental reviews				
2. Procurement activities,				
3. Participant eligibility determinations,				



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4. Financial management, etc.?				
E. Identify each area of responsibility assumed by the subrecipient.				
F. Review those areas using the established monitoring plans to determine compliance with program requirements.				
G. Review activities completed by the subrecipient:				
1. Did the subrecipient complete the activities as identified in the subrecipient agreement?				
2. Did the subrecipient complete any activities that were not determined in compliance in the recipient's IHP(s) of record?				
3. Did the subrecipient generate any program income?				
a. Is the subrecipient being included in the recipient's program income calculation?				
b. Is the program income being offset or used by the subrecipient prior to using grant funds?				



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c. If the recipient has more than \$25,000 in program income, then all of the subrecipient's program income is included (none can be excluded).				
4. For the IHBG program, is/are the subrecipient(s) following the useful life provisions?				
5. Do payments referred to in bills reflect completion?				
6. Did the subrecipient comply with 2 CFR Part 200?				
7. Does the recipient have a cost allocation plan? If yes, was it included in the subrecipient agreement?				
8. Indirect Cost:				
a. Did the recipient exclude the payments to the subrecipient as a pass through cost to the subrecipient?				
b. Does the subrecipient have a cost allocation plan or an approved indirect rate from its oversight agency?				



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VI. Summary				
A. Summarize the results of the review in a work paper. B. Discuss significant issues with Supervisor. C. Develop findings, including questioned costs and corrective actions, as appropriate. D. Develop concerns because they could lead to a violation E. Develop report language, including any findings and concerns. F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended.				

Reviewer Name:	
Review Date(s):	



Attachment -- Subrecipient Monitoring Checklist

(May not be a complete list.)

Monitoring Plans	Check those that apply	Notes and Comments
Self-Monitoring		
Section 504 Accessibility Compliance		
Environmental		
Financial and Fiscal Management		
Indian Preference		
Labor Standards		
Lead-based paint		
Maintenance and Inspection		
Occupancy		
Organization and Structure		
Procurement and Contract Administration		
Relocation and Real Property Acquisition		
Useful Life		
Other Requirements (List below):		
Other Programs (ICDBG, ROSS, RHED/RIF)		