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| **Guide for Review of HOPWA Project Sponsor or Subrecipient Management** |
| **Name of Grantee:**  |
| **Staff Consulted:** |
| **Program Year Under Review:** |
| **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:** This Exhibit is designed to review the management and oversight of project sponsor(s) and/or subrecipients by HOPWA grantees. HUD reviewers should select a sample of project sponsor(s) and/or subrecipients for a program year following the instructions for sampling in Section 10-5 in the introductory text to this Chapter. The information in the file documentation, supplemented with grantee and project sponsor(s) and/or subrecipient 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 project sponsor and subrecipient visits.

This Exhibit is divided into five sections: Grantee Management and Training Systems; Internal Controls; Performance Reporting; On-Site Review of Project Sponsors/Recipients by HUD; and Summary of HUD Review. It includes several questions that are only applicable to grants subject to 2 CFR part 200. These questions will be labeled "For Monitoring Covered by 2 CFR Part 200 Requirements" above the question, and should only be used for grantees covered by 2 CFR Part 200. The Uniform Requirements at 2 CFR part 200 are applicable to the following HOPWA grantees:

* **HOPWA Formula Grants awarded in any year that are subject to HOPWA requirements “as may be amended” are subject to 2 CFR part 200 as of December 26, 2014.** Grantees are required to comply with 2 CFR part 200 as of December 26, 2014, but were required to comply with 24 CFR part 84 or 85 in carrying out activities and incurring costs under their formula award before this effective date. Therefore, formula grants awarded for FY 2014 or earlier are subject to 2 CFR part 200 only for the portion of the operating period on and after December 26, 2014.
* **HOPWA Competitive Grants awarded in FY14 and subsequent years are subject to 2 CFR part 200 as of December 26, 2014.** HOPWA competitive grants awarded in FY13 and prior are not subject to 2 CFR part 200. HOPWA competitive grants awarded in FY 2013 and earlier remain subject to 24 CFR part 84 or 85 in place at the time of the award in accordance with the terms and conditions of the award.

For additional information on the applicability of 2 CFR part 200 requirements for CPD programs, please reference Notice CPD-16-04, *Additional Transition and Implementation Guidance for Recipients of Community Planning and Development (CPD) Funds for 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, accessed at: <http://portal.hud.gov/hudportal/documents/huddoc?id=16-04cpdn.pdf>

**Questions:**

A. GRANTEE MANAGEMENT AND TRAINING SYSTEMS

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| Has the grantee executed written agreements with organizations selected or designated as project sponsors, as well as organizations selected by competitive processes as subrecipient service contractors, to ensure that the organizations comply with HOPWA program requirements? [24 CFR 574.500 and 24 CFR 574.3] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

For Monitoring Covered by 2 CFR Part 200 Requirements

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| If the grantee provides funds through either a subrecipient agreement or a contract, has it followed the criteria in 2 CFR 200.330 for making case-by-case determinations of whether the entity is receiving the funds in the role of either a subrecipient or contractor?[2 CFR 200.330; 24 CFR 574.605]  |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

For Monitoring Covered by 2 CFR Part 200 Requirements

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| In making an award to a project sponsor or subrecipient, has the grantee evaluated each project sponsor’s or subrecipient’s risk of noncompliance with the Federal statutes, regulations, and terms and conditions of the subaward for purposes of determining the appropriate project sponsor or subrecipient monitoring?**NOTE:** This evaluation may include consideration of factors such as:* the project sponsor’s or subrecipient’s prior experience with the same or similar subawards;
* the results of previous audits, including whether or not the project sponsor or subrecipient receives a Single Audit in accordance with Subpart F of 2 CFR part 200, and the extent to which the same or similar subaward has been audited as a major program;
* whether the project sponsor or subrecipient has new personnel or new or substantially changed systems; and
* the extent and results of previous HUD monitoring, if the project sponsor or subrecipient also receives funds directly from HUD.

[2 CFR 200.331(b); 24 CFR 574.605; 24 CFR 574.650] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

For Monitoring Covered by 2 CFR Part 200 Requirements

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| For each subaward provided to a project sponsor or subrecipient, has the grantee clearly identified it as a subaward to a project sponsor or subrecipient and included the following information at the time of the subaward:1. Project Sponsor or Subrecipient name (which must match the name associated with the unique entity identifier)?
2. Project Sponsor’s or Subrecipient’s unique entity identifier?
3. Subaward period of performance start and end date?
4. Total amount of HOPWA funds committed to the project sponsor or subrecipient by the grantee?
5. Amount of Federal funds obligated by the grantee to the project sponsor or subrecipient?
6. Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)?
7. HUD’s name, the name of the grantee, and contact information for the awarding official of the grantee?
8. Catalog of Federal Domestic Assistance (CFDA) number and name of the HUD program under which the award is made?
9. Indirect cost rate for the subaward, if applicable (which must be an approved Federally-recognized indirect cost rate negotiated between the project sponsor or subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the project sponsor or subrecipient (in compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in §200.414(f))?
10. All requirements imposed by the grantee on the project sponsor or subrecipient so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the HUD award to the grantee?
11. Any additional requirements imposed by the grantee on the project sponsor or subrecipient in order for the grantee to meet its own responsibility to HUD, including identification of any required financial or performance reports?
12. A requirement that the project sponsor or subrecipient permit the grantee and auditors to have access to the project sponsor’s or subrecipient’s records and financial statements as necessary for the grantee to meet its requirements under 2 CFR part 200?
13. Appropriate terms and conditions concerning closeout of the subaward?

[2 CFR 200.331(a); 24 CFR 574.605]  |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Does the grantee have standards and procedures for the oversight and monitoring of its project sponsors and any subrecipients? (If “yes,” briefly describe below and, if written, attach a copy of relevant portions, as appropriate.) [24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Does the grantee monitor and/or review the performance of each project sponsor and subrecipient to ensure that the subaward was used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are being, or have been, achieved?? (Attach the planned monitoring /review schedule, if available and as applicable.) [24 CFR 574.500; for monitoring covered by 2 CFR Part 200 Requirements: 2 CFR 200.331(d)] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

For Monitoring Covered by 2 CFR Part 200 Requirements

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| Did the grantee’s monitoring of the project sponsor or subrecipient include:* Reviewing financial and performance reports required by the grantee?
* Following-up and ensuring that the project sponsor or subrecipient takes timely and appropriate action on all deficiencies pertaining to the subaward detected through audits, on-site reviews, or other means?
* Issuing a management decision for audit findings pertaining to the subaward a required by 2 CFR 200.521?

[2 CFR 200.331(d)(1) – (3); 24 CFR 574.605] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| a. Does the grantee perform on-site monitoring of all project sponsors and/or subrecipients?  |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| b. If the grantee does not monitor all its project sponsors and subrecipients on-site, does it have a system or risk assessment processto identify “high risk” project sponsors and prioritize monitoring? [24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| c. Has the grantee established special procedures for “high risk” project sponsors or subrecipients (e.g., limited or inexperienced staff, frequent staff turnover; or programs experiencing difficulties in carrying out activities, such as housing development and/or construction)?  |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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For Monitoring Covered by 2 CFR Part 200 Requirements

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| a. For each project sponsor or subrecipient provided a subaward, has the grantee determined whether the project sponsor or subrecipient met or exceeded the audit threshold set in 2 CFR 200.501 for the respective fiscal year?[2 CFR 200.331(f); 24 CFR 574.605] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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| b. If a project sponsor or subrecipient meets the audit threshold in 2 CFR 200.501, has the grantee verified that the project sponsor or subrecipient is audited as required by Subpart F of 2 CFR part 200?[2 CFR 200.331(f); 24 CFR 574.605] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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For Monitoring Covered by 2 CFR Part 200 Requirements

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| For each project sponsor or subrecipient receiving a subaward, has the grantee considered whether the results of the project sponsor or subrecipient’s audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to grantee’s own records?[2 CFR 200.331(g); 24 CFR 574.605] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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For Monitoring Covered by 2 CFR Part 200 Requirements

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| If the grantee found any project sponsor or subrecipient noncompliant, did the grantee consider taking enforcement action against the project sponsor or subrecipient per 2 CFR 200.338 and the program regulations?[2 CFR 200.338; 24 CFR 574.605] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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| a. Provide the following information regarding the on-site monitoring efforts that have been conducted by the grantee during the period under review: (Use the “tab” key to add additional rows or attach additional sheets.) |
| **Project Sponsors/ Subrecipients** **Name** [[1]](#footnote-2) | **Dates****Monitored** | **Number and Types of Finding** | **Date of Letter with Monitoring Results** | **Date(s) Findings Resolved** |
|       |       |       |       |       |
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| b. Of the project sponsors and subrecipients monitored in “a” above, what percentage does this represent of the total number of organizations funded by the grantee during the period under review? |
| **Describe Basis for Conclusion:** |
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| Describe the grantee’s processes for conducting annual or other periodic reviews to ensure quality monitoring, including appropriate documentation, requested actions, and follow-through on promised actions. |
| **Describe Basis for Conclusion:** |

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| a. Do the grantee’s written monitoring reports clearly document the areas monitored and the conclusions reached? [24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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| b. Do such results include any expected corrective actions and dates for resolution? [24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| a. Are monitoring results communicated timely to project sponsors and subrecipients? |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
| b. Are project sponsors and subrecipients given an opportunity to respond and/or clarify?  |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Use the information provided in the applicable APR, CAPER, IDIS, Action Plan or competitive application to complete the table below and confirm with the grantee during the monitoring for the program year being examined. [24 CFR 574.450] |
| **Program Year**  | **Project Sponsor Name** | **Amounts Committed** | **Amounts Expended in this Period**  | **Balances** |
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| 1. Do the grantee’s financial or program records document the total amount of HOPWA funds obligated to each of its project sponsors or subrecipients during the program year under review?

[24 CFR 574.450 and 24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| 1. Of the amounts obligated above, do records show what amounts remain unexpended?

[24 CFR 574.450 and 24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| 1. For the program year under review, do the grantee’s financial or program records document the funds that are still unexpended from any year prior to the year under review?

[24 CFR 574.450 and 24 CFR 574.500] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| For the period being reviewed, compare a sample of the grantee’s project sponsor or subrecipient records with: * for formula grantees, information in HUD’s Program Accounting System (PAS), the Consolidated Annual Performance and Evaluation Report (CAPER), and the Integrated Disbursement and Information System (IDIS); OR
* for competitive grants, the Annual Performance Report (APR), and IDIS.

Are there any discrepancies which require correction? [24 CFR 574.500] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Does the grantee have a method to ensure that project sponsors and subrecipients receive information, training, or technical assistance to facilitate compliance with the HOPWA program requirements applicable to the activities or projects they are carrying out? [24 CFR 574.410 and 24 CFR 574.500] |

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|  [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Describe the training or technical assistance provided to the project sponsors during the year being reviewed. |
| **Project Sponsor/ Subrecipient** | **Person(s) Trained** | **Topics** | **Date(s)** |
|       |       |       |       |
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| Has the grantee provided appropriate resource materials to its project sponsors and subrecipients (e.g., HOPWA regulations, applicable CPD Notices, 24 CFR Part 5, Subpart F, “*Determining Income and adjustments to income for HOPWA rental assistance program”*)? [24 CFR 574.500 and 24 CFR 574.410] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| Does thegrantee ensure that project sponsors and subrecipients maintain adequate financial and program records to document compliance with program requirements**,** including recordretention? [24 CFR 574.450 and 574.530] |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| a. Are project sponsors and subrecipients accurately reporting program income to the grantee as required in the applicable signed grant agreement? [24 CFR 574.450; and for monitoring covered by 2 CFR Part 200 Requirements: 2 CFR 200.307(e)(2); for monitoring NOT covered by 2 CFR Part 200 Requirements: 24 CFR 84.24, 24 CFR 85.25] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| b. If program income is retained by the project sponsors or subrecipients, are the funds used for eligible program purposes as required in the applicable signed grant agreement?[24 CFR 574.500; and for monitoring covered by 2 CFR Part 200 Requirements: 2 CFR 200.307(e)(2); for monitoring NOT covered by 2 CFR Part 200 Requirements: 24 CFR 84.24, 24 CFR 85.25] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:** |
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B. INTERNAL CONTROLS

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| Has the grantee established qualifications for the persons who conduct financial transactions on behalf of the project sponsors and subrecipients? (Describe qualifications below.) [24 CFR 574.410 and 24 CFR 574.500(a)] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| If project sponsor or subrecipient employees work on both HOPWA and non-HOPWA projects, does the grantee have a system to ensure that these organizations keep appropriate time distribution records and properly charge the HOPWA program, including correctly assigning administrative and program delivery costs? [24 CFR 574.3; for monitoring covered by 2 CFR Part 200 Requirements: 2 CFR 200.302; 2 CFR 200.303; for monitoring NOT covered by 2 CFR Part 200 Requirements: 24 CFR 84.21; 24 CFR 85.20] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |
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| a. Does the grantee review project sponsors and subrecipents for evidence of conflicts of interest, either between the participant and project sponsors/subrecipients, or between the project sponsors/subrecipients and their respective contractors (e.g., seek information on the background of staff or the Board of Directors, seek specific assurances from the project sponsors/subrecipients)? [24 CFR 574.625]  |

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| **Yes** | **No** | **N/A** |

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| **Describe Basis for Conclusion:**      |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Does the grantee take appropriate action to address conflicts of interest, as needed?

[24 CFR 574.625]  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

C. PERFORMANCE REPORTING

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| a. In reporting to HUD in the CAPER, IDIS, or APR, does the grantee collect complete, accurate, timely, and comprehensive performance data for all of its HOPWA project sponsor and subrecipient activities? [24 CFR 574.520] |

|  |  |  |
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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| b. Does the grantee have a tracking system or other method of documenting the receipt, review, and correction (as needed) of the annual performance reportsfrom the project sponsors or subrecipients which are used to report to HUD? [24 CFR 574.500 and 24 CFR 574.520] |

|  |  |  |
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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

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| When providing oversight of reporting by project sponsors and subrecipients, does the grantee review the accuracy and verify the performance data? [24 CFR 574.520] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| In reporting to HUD, does the grantee provide actual housing outputs (the number of households to be assisted during the year) in relation to planned targets and address any variations in performance or adjust program efforts? [24 CFR 574.520] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does the grantee report to HUD on its performance in achieving housing stability outcomes for beneficiaries (the number of households in stable living situations) and assess variations in planned performance and, as applicable, document and report program adjustments? [24 CFR 574.520] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

D. ON-SITE REVIEW OF PROJECT SPONSORS/SUBRECIPIENTS BY HUD

**Instructions:** Sample a selected group of project sponsors and subrecipients to review on‑site as a way of determining the effectiveness of the grantee's monitoring efforts during the year under review. Review the grantee's monitoring reports for the organizations selected. One form should be completed for each organization reviewed. Attach additional sheets as necessary to reflect the results.

To select a sample, request a list of the project sponsors and subrecipients which were using HOPWA funds during the operating year under review and any associated information on the grantee's monitoring of these entities (e.g., records and review dates, any concerns or findings identified by the grantee).

Name of HOPWA project sponsor or subrecipient:

|  |
| --- |
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Program or Project Name:

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| --- |
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Records/Data Reviewed:

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Concerns/Findings (identified by grantee, if any):

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| --- |
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| --- | --- | --- | --- | --- | --- | --- | --- |
| **[OS]** Did the grantee monitor this project sponsor or subrecipient on-site? (If yes, provide the date of the most recent monitoring.) |

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| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **[OS]** Based on your review, does there appear to be any significant differences between actual performance and the reported performance submitted by this project sponsor or subrecipient to the grantee? [24 CFR 574.500] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **[OS]** In interviewing the project sponsor or subrecipient staff, do they appear to possess an adequate understanding of HOPWA rules and other applicable regulations?  |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **[OS]** If this project sponsor or subrecipient was monitored by the grantee, did your review detect any problems or findings that were previously unknown to the grantee? [24 CFR 574.500] |

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| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

E. SUMMARY OF HUD REVIEW

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| --- | --- | --- | --- | --- | --- | --- | --- |
| Based on the results of your review, does the grantee demonstrate that its management and oversight of its project sponsors and subrecipients is sufficient to provide reasonable assurance that funded activities comply with HOPWA program requirements? [24 CFR 574.500] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does your review indicate any recommended actions to address project sponsor and subrecipient management deficiencies? |

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| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
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|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does your review indicate that the grantee needs technical assistance for its project sponsor/subrecipient oversight? |

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| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:**      |
|  |

1. Identify whether the entity is a Project Sponsor “(PJ)” or subrecipient “(S)” being monitored. [↑](#footnote-ref-2)