

2019

SUBRECIPIENT TRAINING

CDBG, ESG, HOME, & JAG PROGRAM



Cobb County CDBG Program Office

192 Anderson Street, Suite 150, Marietta, GA 30060

(770) 528-1455

info@cobbcountycdbg.com / www.cobbcounty.org/cdbg

September 26, 2019

TRAINING AGENDA



General Program Requirements

- Grant Reporting
 - Environmental Review
 - Income Limits
 - Income Verification/Recertification
 - Recordkeeping
 - Monitoring
- Subrecipient Agreements Changes
 - Reimbursements
 - Repayments
 - Important Dates
 - One-on-One Q & A

GRANT REPORTING

Reporting content and frequency may vary, depending on grant-funded program activity and complexity.

How often should each program report?

- CDBG, HOME, & ESG – monthly programmatic and expenditure reports due by **15th**
- JAG – monthly expenditure reports/quarterly programmatic reports due by **10th**



MONTHLY REPORTING: CDBG

CDBG, HOME & ESG reports due by the **15th** of each month for services rendered the prior month.

Monthly reports should always reflect the number of client files maintained.

COBB COUNTY CDBG PROGRAM OFFICE
MONTHLY SERVICES REPORT-SAMPLE



Month/Year of this Report: March 2018		
Agency Name: Health Agency of Williams City		
Activity Name: Health Services		
Person Submitting Report: Linda Smith		Date Submitted: April 15, 2018
NEW PERSONS SERVED THIS MONTH		
<i>Note: All persons served are to be reported only during the 1st month they are served during the January - December Program Year and not reported again during that Program Year.</i>		
1. <u>New Persons Served - Listed By Income Groups - Percentages of Median Family/Household Income</u>	Total Number of Persons Served for The Month	Total Number of Person Served for The Year
A. <u>New persons served [Extremely Low Income - 0%-30% Median Family/Household Income]</u>	15	25
B. <u>New persons served [Very Low Income - 31%-50% Median Family/Household Income]</u>	2	6
C. <u>New persons served [Low Income - 51%-80% Median Family/Household Income]</u>	3	3
D. <u>Total of lines A-C</u>	20	34
E. <u>New persons served [Over 80% Median Family/Household Income/NON-CDBG ELIGIBLE]</u>	10	20
F. <u>Total of lines D and E</u>	30	54
G. <u>Calculate % of CDBG eligible persons- Line D divided by Line F</u>	66%	62%

MONTHLY REPORTING: HOME

- Programmatic report details affordable housing activities.
- Monthly rental reports reflect number of high and low units, fixed or floating units, and client rental assistance.
- Rental reporting is required until end of **affordability periods** (5, 10, or 20) years.

HOME RENTAL PROJECT COMPLIANCE REPORT

Month of _____

Project: _____

Address: _____

Date Submitted: _____

Total # Units in Project: _____
 Total # HOME Units: _____
 # Low HOME Rent Units: _____
 # High HOME Rent Units: _____
 Fixed or Floating: _____

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Unit #	No. of BRs	Low or High HOME Rent Unit	New Tenant ?	Tenant Name	HH Size	Annual (Gross) Income	% AMI	Date of Last Income Re-Examination	Lease Date	Lease Rent	Utility Allowance	Max. Actual Rent (K+ L)	Comments
Ex.	2	L	√	J. Doe	3	\$24,000	50%	01/25/2011	01/25/2011	\$650	\$75	\$725	

MONTHLY REPORTING: ESG

- Reporting provides client-level data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.
- Comparable database for victim services providers.

Enrollment Demographics
3/1/2017 to 3/31/2017



Report Criteria:
 Organizations: My Training Organization
 Programs: My Training Org ESG - Shelter
 Age Range: 0-17,18-45,46-62,63

	Unduplicated		Duplicated	
	#	%	#	%
<input type="checkbox"/> Race	29	100.000%	29	100.000%
American Indian or Alaska Native	4	13.793%	4	13.793%
Asian	2	6.897%	2	6.897%
Black or African American	4	13.793%	4	13.793%
Multi-Racial	9	31.034%	9	31.034%
White	10	34.483%	10	34.483%
<input type="checkbox"/> Ethnicity	29	100.000%	29	100.000%
<input type="checkbox"/> Gender	29	100.000%	29	100.000%
<input type="checkbox"/> Age Range	29	100.000%	29	100.000%
<input type="checkbox"/> Religion	29	100.000%	29	100.000%

MONTHLY REPORTING: JAG

JAG recipients are required to submit quarterly accountability metrics reports.

Reports are intended to promote greater transparency about the use of JAG funds.

BUREAU OF JUSTICE ASSISTANCE JUSTICE ASSISTANCE GRANT (JAG) PROGRAM ACCOUNTABILITY MEASURES

GENERAL INFORMATION MODULE

The General Information Module collects information on your award status and organization in general. It should be completed by all grantees and subgrantees for each reporting period the award is active.

1. Have you completed all project activities and expended all funds during the reporting period?
 - A. Yes; a final report will be created closing out the PMT reporting requirements after this report is complete.
 - B. No; please continue.
2. Was there **grant activity** during the reporting period? *“Grant activity” includes the expenditure of any grant funds or the operation of any grant-funded program, activity, or event. By selecting “Yes,” you are indicating that during the reporting period, your program is operational, meaning you either spent JAG funds or conducted any activities or services. By selecting “No,” you are indicating that for during the reporting period, your program is nonoperational, meaning you did not spend any JAG funds or conduct any activities or services.*
 - A. Yes
 - B. No (**skip to the Goals and Objectives module**)
 - C. If No, please explain: _____



ENVIRONMENTAL REVIEW

- Assess the environmental impact of activities.
- ER prepared by CDBG Program Office.
- ER required for HUD Programs **prior** to providing services.

REQUEST FOR ENVIRONMENTAL REVIEW

SUBRECIPEINT MAY NOT UNDERTAKE ANY ACTIVITY WITH HUD OR NON-HUD FUNDS WITHOUT A COMPLETED ENVIRONMENTAL REVIEW.

Date of Request:

Name and Agency:

Funding Source: CDBG HOME ESG

Property Address:

Project Description:

Project budget: \$

PROPOSED PROJECT DESCRIPTION:

DPA TBRA Supportive Services Operating Costs Acquisition (Property)

Demolition New Construction Rehabilitation

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INCOME LIMITS: CDBG & HOME

2019 CDBG & HOME Income Limits – Effective June 28, 2019

Family Size	Extremely Low 30%	Very Low Income 50%	Moderate Income 60%	Low Income 80%
1	\$16,750	\$27,900	\$33,480	\$44,650
2	\$19,150	\$31,900	\$38,280	\$51,000
3	\$21,550	\$35,900	\$43,080	\$57,400
4	\$23,900	\$39,850	\$47,820	\$63,750
5	\$25,850	\$43,050	\$51,660	\$68,850
6	\$27,750	\$46,250	\$55,500	\$73,950
7	\$29,650	\$49,450	\$59,340	\$79,050
8	\$31,550	\$52,650	\$63,180	\$84,150

All CDBG & HOME beneficiaries must have income at or below 80% AMI.

INCOME LIMITS: ESG

2019 ESG Income Limits – Effective April 24, 2019

FAMILY SIZE	30% AREA MEDIAN INCOME
1	\$16,750
2	\$19,150
3	\$21,550
4	\$23,900
5	\$25,850
6	\$27,750
7	\$29,650
8	\$31,550

Prevention and Rapid Re-housing beneficiaries must have income at or below 30% AMI.

Income Verification/Recertification

Income Verification

CDBG, HOME, and ESG clients' incomes should be verified prior to providing assistance.

Subrecipients should use the current income limits at the time of verification.

Recertification

CDBG: Each time a client receives a new service.

HOME: Every 6 months until service is provided.

ESG: Homeless Prevention every 3 months; Rapid Re-housing - Annually

RECORDKEEPING

Every Subrecipient is required to establish and maintain **at least three major categories** of records:

Documenting Eligibility – Subrecipient should establish a procedure for how eligibility will be documented for each client.

Case File Organization – Case file checklist, application for services, consent forms, proof of identification. Documents should be tabbed and placed in order of checklist.

Administrative Records - Files and records that apply to the overall administration of the Subrecipient's activities.



RECORDKEEPING: CASE FILE ORGANIZATION



Client files should contain the following:

- Case File Checklist
- Application for services
- Consent Forms
- Proof of Identification
- Proof of Residence
- Income Verification Documents
- Income Limits
- Environmental Review
- Housing Eligibility Documentation
- Additional Services Documentation (lease and lease addendums, assistance contracts, HUD-1 statements, etc.)

MONITORING

The purpose of monitoring is:

Compliance with all regulations governing administrative, financial, and programmatic grant activities.

Ensure Subrecipients achieve performance objectives on schedule and within budget.



MONITORING: RISK ANALYSIS

At the beginning of each Program Year, risk analyses are conducted for all Subrecipients with active grant funding.

The Risk Analysis process is used to rank high and low risk Subrecipients in the following areas:

- Program size
- Program expenditures
- Number of employees
- Audit findings
- Programmatic compliance issues



TYPES OF MONITORING CONDUCTED

- **Administrative and financial monitoring** assesses the fiscal and administrative management of grant funds.
- **Project monitoring** assesses compliance with requirements related to specific grant activities and projects
- **Long-term monitoring** assesses compliance with long-term program requirements that apply to grant-assisted activities after project completion.

FORM OF MONITORING

Desk Review - in-house file review of previous documents submitted by the Subrecipient.

On-site Visit - review of the Subrecipient's programmatic, administrative, and financial records at an agency's service or administrative location.

Documents review can include: contractual agreement, progress reports, reimbursement requests, documentation of previous monitoring.

File reviews will be a random sample of client files.

MONITORING RESULTS

The framework for analyzing monitoring results are:

- **Finding** - areas of statutory or regulatory noncompliance that must be addressed immediately.
- **Concern** - issues that are not instances of statutory or regulatory noncompliance but may result in noncompliance if they are not addressed.
- **Corrective Action** - steps that must be taken to correct instances of noncompliance, poor management, or poor performance that are identified from the monitoring
- **Recommendation** - comments about areas where the funded entity can improve program performance.



SUBRECIPIENT AGREEMENTS

At the beginning of each Program Year, Subrecipients will be provided Agreements that provide guidance for funded activities. The agreement:

- Fulfills legal requirements by presenting the regulations of the grant program and the conditions under which funds are provided;
- Provides guidance for monitoring Subrecipient performance and;
- Provides an essential vehicle for training the Subrecipient's staff.

WHAT'S IN YOUR AGREEMENT?

- Duration of the Agreement
- Environmental Review Requirements
- Record Keeping/Reporting Requirements
- Program Income
- Reimbursement Process
- Repayments



- Certifications
- On-going Obligations
- Scope of Work
- Audits
- Project Budget
- Resources

DURATION OF AGREEMENT

Subrecipient Agreements remain in effect during any period that the Subrecipient has control over any grant funds including Program Income (PI).

Agreement Effective Date	January 1, 2019
Deadline for Commitment of Funds	December 31, 2019
Deadline for Expenditure of Funds	December 31, 2021
Agreement Termination Date	December 31, 2021
Deadline for Receipt of Final Reimbursement Request	January 31, 2022

Note: Amendments may occasionally be necessary if there are changes to the scope or schedule of work.

ON-GOING OBLIGATIONS



Subrecipients must abide by the terms of the Agreement and regulations for all projects initiated until funds and Program Income are expended.

Subrecipient Agreement will continue to govern the relationship between the Subrecipient and the County.

CERTIFICATIONS



Subrecipients must certify to abide applicable provisions, including:

- Conflict of Interest
- Debarment
- E-Verify
- Lobbying
- Hatch Act (*prohibits political activities*)
- Insurance
- SAM.gov Registration

SCOPE OF WORK

The Scope of Work defines the expectations of services through the Agreement and includes:

- Detailed description of the work to be performed
- Deadline for completion of the work
- Performance Outcomes
- Project Budget

REIMBURSEMENT PROCESS

Subrecipients are required to submit monthly bills together with proper support documentation.

Reimbursement payments will be processed using the County's 30-day payment schedule.

Subrecipients **cannot** hold request(s) for reimbursements for more than two months after service is provided.

Reimbursement requests should be submitted to:
cobbcdbgpayers@cobbcountycdbg.com



REIMBURSEMENT DOCUMENTATION

The following is a list of required reimbursement documentation:

- Monthly Expenditure Report signed by Executive Director/Lead Administrator/Supervisor
- Monthly Services or Narrative Report
- Itemized list of program reimbursables and cost
- Supporting documentation (copies of checks, receipts, bills)
- Documentation which identifies payment was made in advance by the organization
- Verification of Client Eligibility

REPAYMENTS

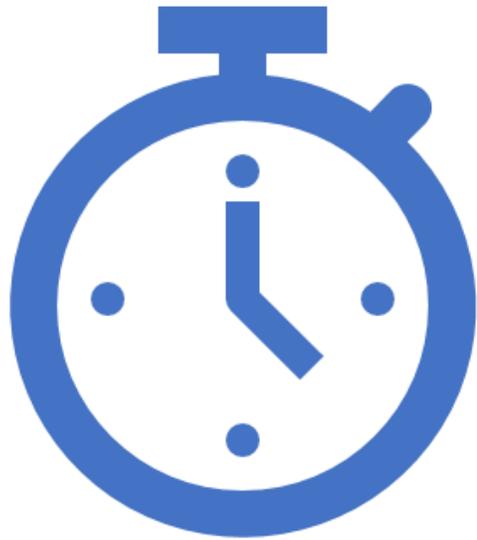
Subrecipients must repay grant funds for activities that do not meet:

- Applicable eligibility requirements
- Projects that are deemed ineligible
- Projects that are terminated before completion



Payment must be made to the County within **30 days** of notification of violation. If the County is no longer a grant recipient, funds must be repaid to the awarding agency.

IMPORTANT INFORMATION



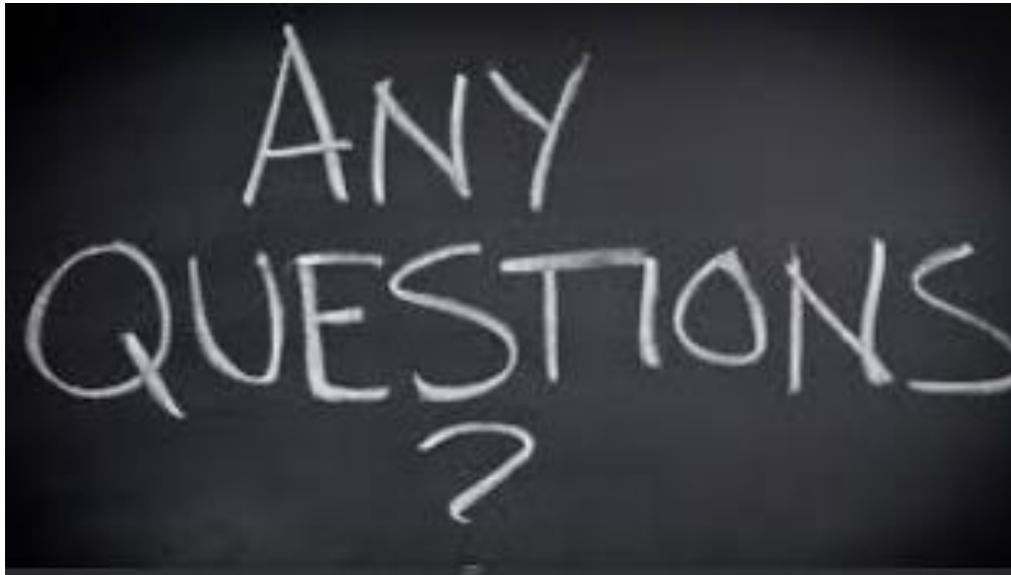
Grant Informational Workshops:

- October 1st at 2:00 pm at Gritters Library
- October 17th at 11:00 am at Sewell Mill Library
- October 24th at 2:00 pm at West Cobb Library
- November 6th at 2:00 pm at South Cobb Library

CSBG Application Cycle: October 1, 2019 – November 1, 2019

CSBG Application Workshop: October 3rd at 2:00 pm at Ron Anderson Recreation Center

CDBG PROGRAM OFFICE CONTACT



CDBG Program Office

Phone:

770-528-1455

Email:

Info@cobbcountycdbg.com

Website:

www.cobbcounty.org/cdbg