1. **Who should attend the webinar or listen to this webinar recording?**

   Any subrecipient who receives an award or allocation from the California Dept. of Housing and Community Development (HCD) under the 2017 CDBG-DR, 2017 CDBG-MIT, 2018 CDBG-DR, or 2018 CDBG-MIT programs will be required to complete a subrecipient risk assessment questionnaire in accordance with federal regulations (per 2 CFR §200.332(b)) and should have either attended the webinar or should listen to the webinar recording.

2. **Where and when will a recording of this webinar be available for HCD's subrecipients?**

   The recording link (audio/video) was submitted to the subrecipient email contact list originally utilized for the webinar invite. For those subrecipient staff who did not receive an invite or would like to view the webinar, please reach out to HCD Monitoring and Compliance staff member Marcia Flores at marcia.flores@hcd.ca.gov.

3. **When will completing the questionnaire be required for CDBG-DR or CDBG-MIT fund recipients?**

   HCD will ask subrecipients to complete a questionnaire or provide information to update their questionnaire within about six months of signing and completing a Master Standard Agreement (MSA) or Standard Agreement (SA) for any program award or allocation they receive.

   a. **Is the questionnaire associated with any particular project or activity?**

      At the time of an initial HCD Monitoring and Compliance completion request, the questionnaire is primarily associated with program allocations as the HCD staff understand that subrecipients may not have fully developed projects yet; however, the HCD Monitoring and Compliance staff may request information on a project level in future (subsequent year) risk assessment questionnaire updates to more accurately assess risk at that time.

4. **When does the risk assessment begin? We have applied for a HCD grant but have not received a notice of award. Does invitation to this webinar imply an award is forthcoming?**

   Please see the response to Question #3 regarding when a subrecipient could expect the subrecipient risk assessment review process to begin. Given this information, the invitation to this webinar does not imply an award is forthcoming, but rather identifies those subrecipients who have an allocation or may have submitted a project for consideration during the Notice of Interest (NOI) period on those applicable 2017 CDBG-DR, 2017 CDBG-MIT, 2018 CDBG-DR, and 2018 CDBG-MIT grant programs. In the event a subrecipient has obligated funding under a fully executed MSA or SA for any program under the grants listed above, HCD Monitoring and Compliance will begin reaching out to subrecipients via email notification in May for those applicable *subrecipients outlined above to begin the risk assessment questionnaire completion process.*

a. **Will subrecipients receive the request for assistance to complete the questionnaire via e-mail or phone call and will this request occur prior to the identification of documents needed from HCD staff?**

While an email notification, as identified above, will represent HCD's initial request for assistance from the subrecipient to support completion of the questionnaire, HCD Monitoring and Compliance staff will follow up via phone call to either confirm documentation which the HCD staff may already have available from prior HCD reviews (e.g., due diligence, prior HCD monitoring) and to answer any subrecipient questions, as needed, regarding information the subrecipient would provide within the questionnaire. Additionally, during this process, the staff may update the subrecipient's online questionnaire with documentation and information received from these prior reviews so that the subrecipient would need to provide less information.

b. **Will the Risk Assessment automatically show up in our portal, the way the Due Diligence did?**

At the time a subrecipient receives an email notification to complete the risk assessment questionnaire, they will follow the links and prompts to create and complete this questionnaire. A subrecipient can consider this to be the automatic prompt in the Grants Network portal to "get started" on the questionnaire. Additionally, the risk assessment questionnaire will continue to be accessible from the portal until it's completed and submitted to HCD Compliance and Monitoring staff.

5. **When will subrecipients receive a copy of the presentation slides used during the webinar?**

HCD has made the slides available and accessible to people with disabilities on its website. Anyone can access the slides here on HCD's 2017 CDBG-DR website.

6. **Will HCD consider subrecipients who have staff with a substantial amount of years of CDBG administration experience but are new to CDBG-DR funding as "High Risk"?**

HCD will take into consideration any CDBG (entitlement, regular, ESG, etc.) program experience when assessing risk on a subrecipient's program capacity and experience. The subrecipient should respond to those questions in the questionnaire by providing a description of all relevant program experience, including years of work on other CDBG-funded activities. Given the level and scope of that experience, there will most likely be a lower risk under that risk component.

7. **Is the time utilized on receiving training under this webinar reimbursable with CDBG-DR or CDBG-MIT funds?**

The answer depends on circumstances specific to each subrecipient. The training could be if covered or identified under a program delivery budget. HCD staff will provide further guidance to subrecipients on the potential eligible use of program funding to cover time spent on this webinar training.

8. **Should subrecipients include contracts with administrative consultants who will assist the subrecipient in components of the implementation process as part of the response to show capacity?**

HCD is aware of jurisdictions who draw upon contract staff, particularly for the administration of the CDBG program. That experience will be taken into account. Only the expertise to support local government staff, specifically the area(s) in which a consultant anticipates playing a role, will account towards the subrecipient's capacity in implementing the DR and MIT programs. While subrecipients may include an existing contract(s) to support a demonstration of capacity, the Monitoring and Compliance staff are not conducting during this assessment any monitoring reviews of contracts or procurements to determine adherence to federal regulations or cost eligibility.

a. **Could a procured administrative contractor factor into capacity and the jurisdiction's staff?**

Possibly. The subrecipient should provide a description which details factors such as scope of work, the level of detail that a jurisdiction has a contractor perform, and the level of expertise which is needed in order for the HCD Compliance and Monitoring staff to make a proper assessment of risk as it relates to the jurisdiction's capacity and staff structure.

b. **Does staff capacity include consultants that are administering the program along with the municipalities or does staff capacity only include municipalities and not the consultants who may be brought on to support the municipality?**

The staff capacity can include the services provided by a contractor who is performing as a consultant on the CDBG-DR or CDBG-MIT program and can include another public agency where those services are helping to implement a DR or MIT-specific program.

c. **Does HCD want subrecipient staff information because they intend to complete outreach to staff?**

Yes, HCD would like staff information to not only identify or measure staff capacity but to also establish who the key personnel are in the event HCD conducts outreach or technical assistance. HCD would also anticipate having an idea of what the organizational structure of the staff looks like and what each individual staff member, including any administrative consultants, will be responsible for under a subrecipient's DR or MIT program(s) or project(s).

9. **How should subrecipients upload supporting documents into the questionnaire if multiple documents need to be provided?**

The system will only allow one .pdf file upload per upload request field. If the subrecipient is looking to upload multiple documents to an upload field in the questionnaire template, all of the documents must be combined together as one .pdf file and then uploaded. For example, in the upload request where HCD asks the subrecipient to upload multiple job descriptions to indicate organizational structure and responsibilities, the subrecipient would combine multiple job descriptions as one file and upload.

10. Can HCD confirm if a third-party entity means a sub-grantee which would be a municipality or not-for-profit?

If a jurisdiction is awarded funds as a subrecipient of HCD and then decides another entity is better positioned to implement a specific project, that entity is considered a third-party entity for the purposes of the questionnaire. In the questions under the Program Implementation risk criteria section of the questionnaire, the term subrecipient refers to such a third-party entity that's assisting your jurisdiction in carrying out all or part of the CDBG-DR or CDBG-MIT program.

11. If a subrecipient was monitored but never received a follow up letter with the results, how would they categorize that scenario under the Compliance History risk criteria section in the questionnaire?

If it was a prior HCD monitoring, the HCD Monitoring and Compliance team can investigate to determine any outstanding findings or concerns (also see response to question #4a). If the monitoring was with another entity, the subrecipient should notate the status of the monitoring which occurred with the outside agency.

12. Will HCD provide the subrecipients with a "template" of the questionnaire so that they can begin gathering the required information now?

The questionnaire is designed to prompt additional questions based on the subrecipient's answers and will sync in with the Grants Network portal. Currently, a separate, written template is not available to be provided; however, please refer to the recording identified in the response to question #2, which provides a presentation of the questionnaire walkthrough. The walkthrough will allow subrecipients to see which questions and documents HCD's Compliance and Monitoring team will request.

13. How soon will HCD require subrecipients to complete the questionnaire once the initial email notification is sent?

Once the subrecipient logs into the risk assessment questionnaire and notifies the HCD monitor, the monitor may take 48-72 hours to go into the questionnaire to upload documents or input information from any HCD-led due diligence, prior monitoring, or other review which supports the subrecipient in completing the questionnaire. Once the HCD upload of previously submitted documents takes place, subrecipients will then have two weeks to complete the questionnaire and send back to HCD.