



# CA HCD ESG-CV Training Series: Monitoring Process







- The State of California's Department of Housing and Community Development (CA HCD) is <u>required</u> to monitor each program, function, or activity funded by its ESG & ESG-CV award
- Monitoring is not limited to a one-time event but is rather an ongoing process that assesses the quality of ESG & ESG-CV funded program performance over the life of the Standard Agreement and involves continuous communication and evaluation
- The goal of this process is to assist ESG & ESG-CV funded programs with improving performance, increasing capacity, and avoiding or remedying instances of non-compliance



#### **HCD Grantee Monitoring Overview**

HCD's grantees are required to monitor and report on the performance of their ESG & ESG-CV funded programs, including those implemented by:

- Internal departments and divisions
- Service providers and contractors

EXHIBIT D

#### Monitoring Grant Activities

- A. Subrecipient shall monitor the activities selected and awarded by them to ensure compliance with all ESG requirements. An onsite monitoring visit of homeless service providers shall occur whenever determined necessary by the Subrecipient, but at least once during the grant period.
- B. The Department will monitor the performance of the Subrecipient based on a risk assessment and according to the terms of this Agreement. The Department may also monitor any service providers of the Subrecipient as the Department deems appropriate based on a risk assessment.
- C. The Department will monitor the performance of Subrecipient and funded projects based on the performance measures used by HUD in ESG or the Continuum of Care program. In the event that project-level or system-wide performance consistently remains in the lowest quartile compared to all participating Service Areas in the Continuum of Care allocation, the Department will work collaboratively with the Subrecipient to develop performance improvement plans which will be incorporated into this Standard Agreement.
- D. If it is determined that a Subrecipient or any of its service providers falsified any certification, application information, financial, or contract report, the Subrecipient shall be required to immediately reimburse the full amount of the ESG award to the Department, and may be prohibited from any further participation in the ESG program. The Department may also impose any other actions permitted under 24 CFR 576.501 (c).
- E. As requested by the Department, the Subrecipient shall submit to the Department all ESG monitoring documentation necessary to ensure that Subrecipient and its service providers are in continued compliance with all ESG requirements. Such documentation requirements and the submission deadline(s) shall be provided by the Department when the information is requested from the Subrecipient.
- F. Subrecipient and its service providers shall cooperate with the Department and shall make available to the Department all information, documents, and records reasonably requested, Copies of these items will also be made available to the Department upon their request. Subrecipient shall provide the Department the reasonable right of access to the Site during normal business hours for the purpose of assuring compliance with this Agreement and evaluating the Subrecipient's performance.



#### **HCD Grantee Monitoring Overview**

- HCD's grantees are expected to make all program records available to CA HCD for, and to participate in, regular monitoring events
- This training will outline CA HCD's approach to monitoring which grantees may choose to adopt

EXHIBIT D

#### 25. Audit/Retention and Inspection of Records

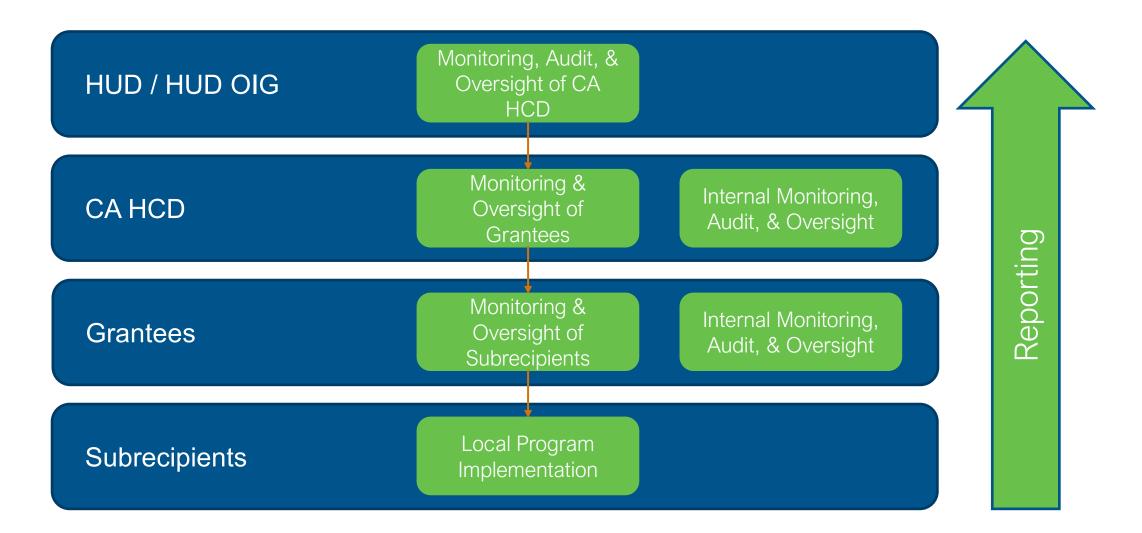
A. Subrecipient agrees to maintain accounting books and records in accordance with Generally Accepted Accounting Principles, per 2 CFR 200.49 Subrecipient agrees that the Department, the Department of General Services, the Bureau of State Audits, the Department of Housing and Urban Development, or their designated representatives, shall have the right to review and copy any records and supporting documentation pertaining to the performance of this Agreement. Subrecipient agrees to maintain such records for possible audit for five (5) years after the Department closes its HUD grant or any other period specified in 24 CFR §576.500 (y).

<u>NOTE</u>: Record retention is based on <u>the Department's HUD closing date; NOT five (5)</u> <u>years from this Agreement expiration</u>. The retention requirement can extend beyond five (5) years after this Agreement expires. Therefore, the Subrecipient must contact the Department for the specific record retention date for this Agreement. Subrecipient agrees to allow the auditor(s) access to such records during normal business hours and to allow interviews of employees who might reasonably have information related to such records. Further, Subrecipient agrees to include a similar right of the Department to audit records and interview staff in any subcontract related to performance of this Agreement.

- B. If Subrecipient receives federal funds that, in the aggregate, equal or exceed the threshold identified in the Uniform Administrative Requirements, the Subrecipient must have an annual single audit in compliance with the Single Audit Act of 1984, as amended and comply with 2 CFR Part 200, Subpart F. The audit shall be performed by a qualified State, local or independent auditor. Subrecipient shall notify the Department of the auditor's name and address immediately after the selection has been made. The contract for audit shall include a clause which permits access by the Department to the independent auditor's working papers. Audits shall be submitted to the Department when completed but no later than nine months following the close of the fiscal year. Subrecipient shall take corrective actions on any issues noted during the audit within six months of the date of receipt of the reports. HCD shall consider sanctions as described in 2 CFR § 200.505 if the Subrecipient is not in compliance with these audit requirements.
- C. Subrecipient, its service providers, and their contractors, or subcontractors shall comply with the audit requirements contained in 2 CFR Part 200.



#### **Roles & Responsibilities**





#### **Process & Outcomes**



Potential Monitoring Outcomes						
Clearance:	No violation of the program regulations or Standard Agreement requirements					
Concern:	A condition, that if not corrected, may result in a violation of the program regulations or Standard Agreement requirements					
Finding:	A violation of the program regulations and/or Standard Agreement requirements					

\*Failure to address findings in accordance with the recommended corrective action may result in the temporary denial of reimbursement, repayment of previous reimbursements, or termination of the agreement







Determine Pool Conduct Assessment Complete Records Finalize Results

- Consistent with HUD requirements detailed in the <u>CPD Monitoring Handbook</u> and <u>CPD Notice 14-04</u>, CA HCD conducts a risk assessment on entities implementing ESG & ESG-CV funded activities to identify the risk of fraud, waste, abuse, and noncompliance
- Grantees enter the risk assessment pool six (6) months after the Standard Agreement has been executed and will remain in the pool until closeout

#### **Risk Assessment**





Determine Pool



Finalize Results

CA HCD will fill out the **Risk Assessment Tracker** by listing all grantees subject to the risk assessment

Subrecipient Name 👻	Effective Date of Agreement	Date of Risk Assessment 🔻	Risk Score 💂	Risk Level 🚽	Priority 🚽	Target Month for Event	Event Type 💂	Last Year Risk Score ▼	Date of Last Eve 👻	Last Event Typ 👻

#### **Risk Assessment**







- CA HCD will complete a Risk Assessment Worksheet for each grantee in the risk assessment pool to determine the level of risk they pose
  - The risk assessment is measured on a 100-point scale whereby each grantee is assigned points for various factors which are summed up to a total score that corresponds with the following risk categories:
    - High risk (51-100)
    - Medium risk (30-50 points)
    - Low risk (0-29 points)





Dete

Ass

Final

Deal	ESG-CV Summary Risk Analysis Name of Subrecipient:	Fiscal Year Re	view:
ne Pool	Name of HCD Evaluator:	Date:	
		Dater	
	Description: To Be Completed By Evaluator		Evaluator's Ratin
	Factor 1 – Grant Management	(High/Medium/Low	Evaluator's Ratin
	A. Grantee Reporting	(3/2/0)	0
	B. Grantee Staff Capacity	(5/3/0)	0
	C. Program Complexity	(5/3/0)	0
uct	D. Grantee Findings and Sanctions (Monetary and OIG)	(17/8/0)	0
	E. Grantee Cross-Cutting Requirement Compliance	(2/0)	0
mont	Subtotal for Grant Management	(Max. 32 pts.)	0
ment			
	Factor 2 – Financial Management	(High/Medium/Low	Evaluator's Ratir
	A. Staff Capacity for Financial Compliance	(10/5/0)	0
	B. Grant Amount	(3/2/0)	0
	C. Grantee A-133 Audits	(2/0)	0
	D. Program Administration Cap	(5/3/0)	0
1 (	E. Expenditure Requirements	(10/5/0)	0
lete	Subtotal for Financial Management	(Max. 30 pts.)	0
rds	Factor 3 - Services & Satisfaction	(High/Medium/Low	Evaluator's Ratir
100	A. Grantee Citizen Complaints or Negative Media Exposure	(3/2/0)	0
	B. Grantee Responsiveness	(2/0)	0
	C. Meeting Program Objectives	(5/3/0	0
	D. Homelessness Prevention/ Rapid Re-Housing	(5/0)	0
	E. Emergency Shelter and Temporary Emergency Shelter	(10/5/0)	0
	Subtotal for Services & Satisfaction	(Max. 25 pts.)	0
Results	Factor 4 - Physical	(High/Medium/Low	Evaluator's Ratir
results	A. Physical Condition of Emergency Shelters/ Temporary Emergency	(13/6/0)	0
	Subtotal for Physical Assets (Leasing or Rental Assistance)	(Max. 13 pts.)	0
		(B.G., , 400 - 1 - )	100
	Total Overall ESG-CV Risk Score	(Max. 100 pts.)	100

#### CRITERIA 1 – GRANT MANAGEMENT

Factor Definition: Extent to which the subrecipient has the capacity to carry out ESG-CV activites according to established requirements.

Rating Considerations: The basis for the Evaluator's rating in this factor is based on information that directly evidences the subrecipient's capacity to administer the grant, including: scope of eligible activities and subawardees; progress in implementing the project, changes in staff during the last year, lack of experience with Federal grants or project activities, and frequency and level of bachnical assistance required by the subrecipient to carry out activities. The following reports and reporting systems can be considered, including but not limited to: Consolidated Plans, Consolidated Annual Performance and Evaluation Reports (CAPERs), Integrated Disbursement and Information System (IDIS), Analysis of Impediments to Fair Housing Choice, Office of Inspector General (OIG) audits, and other reporting mechanisms and systems. Environmental Compliance, Relocation and Acquisition Policies Compliance and Flood Insurance Protection Compliance expected.

The Evaluator should award point values to subfactors A through E. Choose only one risk score for each subfactor from the point values listed below.

|--|

A. ESG-CV Subrecipient Reporting

Criteria: Risk is based on the subrecipient meeting deadlines while ensuring completeness and accuracy of information contained therein.

The following documents, if available, are helpful in performing the review: Reports and submissions of program performance data for Consolidated Plans, Annual Action Plans, Consolidated Annual Performance and Evaluation Reports (CAPERs), ESG-CV Quarterly Reports, and Federal Funding and Accountability Transparency Act (FRTA) reports.

i. Two or more of subrecipient's required submissions for the duration of the program are incomplete; OR are received 30 days or more after prescribed timeframes; OR contain inaccurate data on key compliance areas such as expenditure caps and matching requirements.	High	3	
i. One of the subrecipient's required submissions for the duration of the program are incomplete; OR are received 30 days or more after prescribed timeframes; OR contain inaccurate data on key compliance areas such as expenditure caps and matching requirements.	Medium	2	
<li>III. All subrecipient's required submissions are complete AND have been received by the HCD within prescribed timeframes for the duration of the program.</li>	Low	1	

#### **Risk Assessment**





**Determine Pool** Conduct Assessment <u>Complete</u> Records **Finalize Results** 

- The results of each risk assessment should be entered into the **Risk Assessment Tracker**
- Once all risk scores have been entered, rank all grantees in order from highest to lowest risk based on their total score

Subrecipient Name 👻	Effective Date of Agreement	Risk Score 🚽	Risk Level 💂	Priority 👻	Target Month for Event	Event Type 💂	Last Year Risk Score	Date of Last Eve 👻	Last Event Typ 👻







Determine Pool Conduct Assessment

Complete Records

**Finalize Results** 

Each risk assessment must be supported by documentation in accordance with the **Risk Assessment File Checklist** 

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

ESG-CV Risk Assessment File Checklist

Subrecipient Name:	
Risk Assessment Determination:	

General					
ESG-CV Risk Assessment Worksheet					
Copies of Documents Reviewed					
Correspondence					
Risk Assessment Tracker					

Other					
Enter description					
Enter description					
Enter description					
Enter description					

#### **Risk Assessment**







Once all risk assessments have been completed, CA HCD will perform a review of each risk assessment file to ensure the documentation supports the results

Once the Risk Assessment Tracker has been approved, the risk assessment is complete

## **Monitoring Plan**





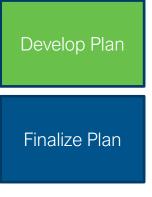
Develop Plan Finalize Plan

- The monitoring plan serves as a roadmap that prioritizes monitoring higher risk grantees
- Based on the results of the risk assessment, complete the Monitoring Plan Tracker to identify:
  - All grantees in order from highest to lowest risk
  - The projected timeline of the monitoring events
  - CA HCD and grantee contact information
  - The type of monitoring event (on-site or desk) to be conducted and the area(s) that will be reviewed

## **Monitoring Plan**





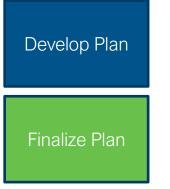


- A Desk Monitoring consists of an in-depth financial review of at least one Request for Funds (RFF) per grantee, per quarter, to ensure appropriate source documentation is maintained
- An On-Site Monitoring is a comprehensive review of highrisk grantees and their compliance with one or more program requirements including, but not limited to, activity and participant eligibility, data collection and reporting, as well as other federal requirements
  - On-Site Monitoring may be conducted remotely due to extenuating circumstances that prevent the event from being conducted on-site (e.g., COVID-19)

## **Monitoring Plan**







CA HCD will perform a review of the Monitoring Plan Tracker to ensure it is complete and accurately reflects the results of each risk assessment

Upon approval, the Monitoring Plan Tracker shall be distributed to relevant staff

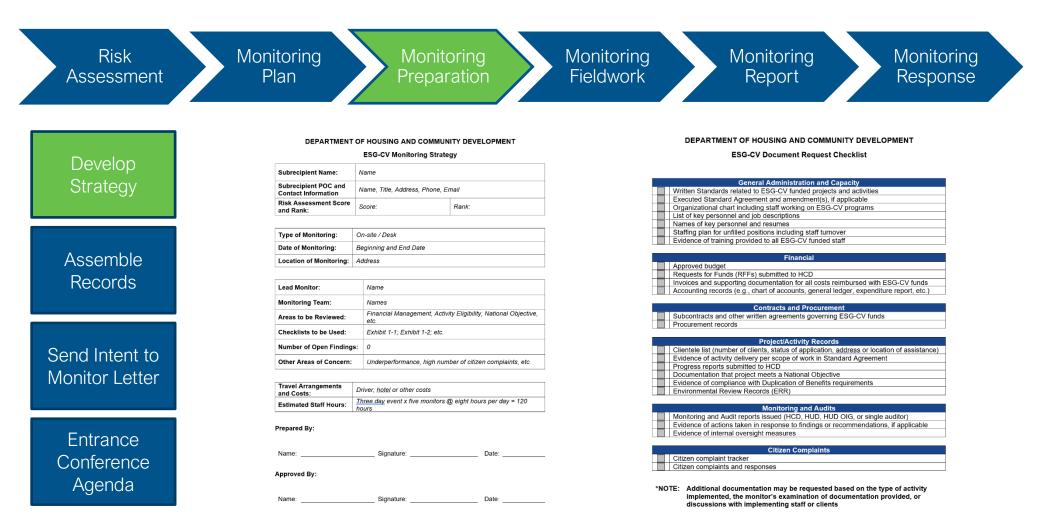




Develop Strategy Assemble Records Send Intent to Monitor Letter Entrance Conference Agenda

- Complete a Monitoring Strategy for each grantee being monitored by defining the type of monitoring (on-site or desk) to be performed, the area(s) that will be reviewed, and the checklists to be used
- Identify any records that will be reviewed during the monitoring in the **Document Request Checklist**







Develop

Strategy

Assemble

Records

Send Intent to Monitor Letter

Entrance Conference

Agenda

#### **Monitoring Preparation**

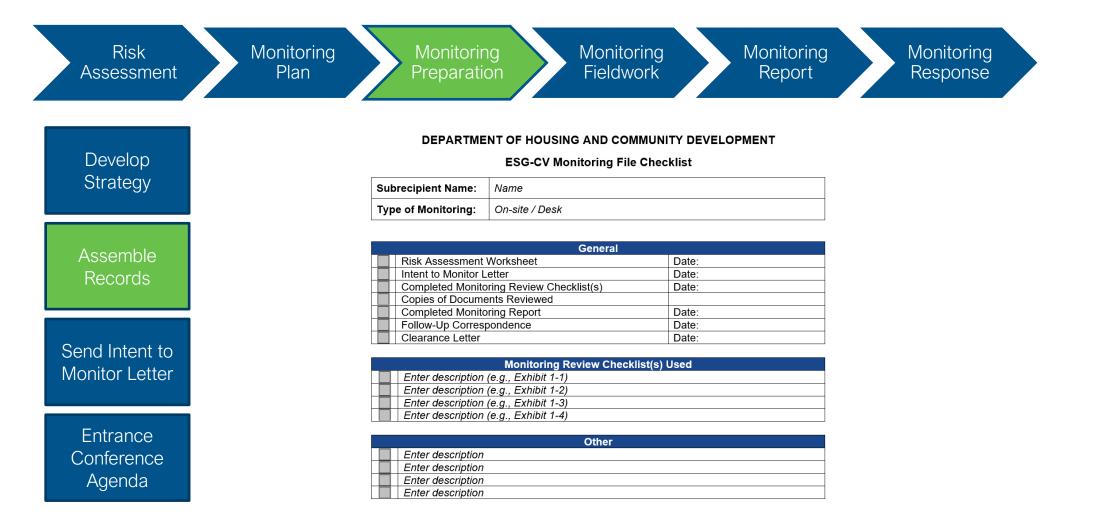


Assemble a file for each monitoring to be performed utilizing the Monitoring File Checklist

CA HCD will review each monitoring file to ensure appropriate parameters have been defined in the Monitoring Strategy

Upon approval, the Monitoring Tracker should be updated to reflect the finalized approach









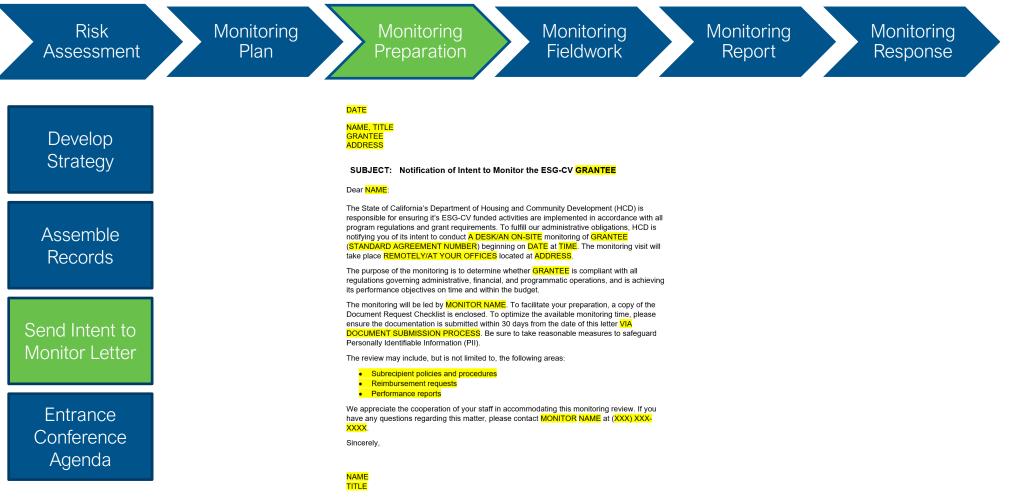
Develop Strategy Assemble Records Send Intent to Monitor Letter

Entrance Conference Agenda Once the date of the monitoring is determined, an **Intent to Monitor Letter** will be sent to the grantee at least 30 days before the monitoring event

#### The letter should include the following:

- Date(s) of the monitoring event and a statement indicating whether the review will occur remotely or on-site
- Activity(ies) and area(s) to be reviewed
- Attach the **Monitoring Checklists** to be used during the event
- Attach the **Document Request Checklist**





Enclosure cc: NAME, TITLE



Develop Strategy

Assemble Records

Send Intent to

Monitor Letter

Entrance

Conference Agenda

#### **Monitoring Preparation**



#### Prepare the Entrance Conference Agenda

- Monitors are encouraged to review the following records before the monitoring to become familiar with the activity(ies) and identify any potential deficiencies:
  - Standard Agreement
  - Performance Reports
  - Requests for Funds (RFF)

- Written Standards
- Copies of audit reports



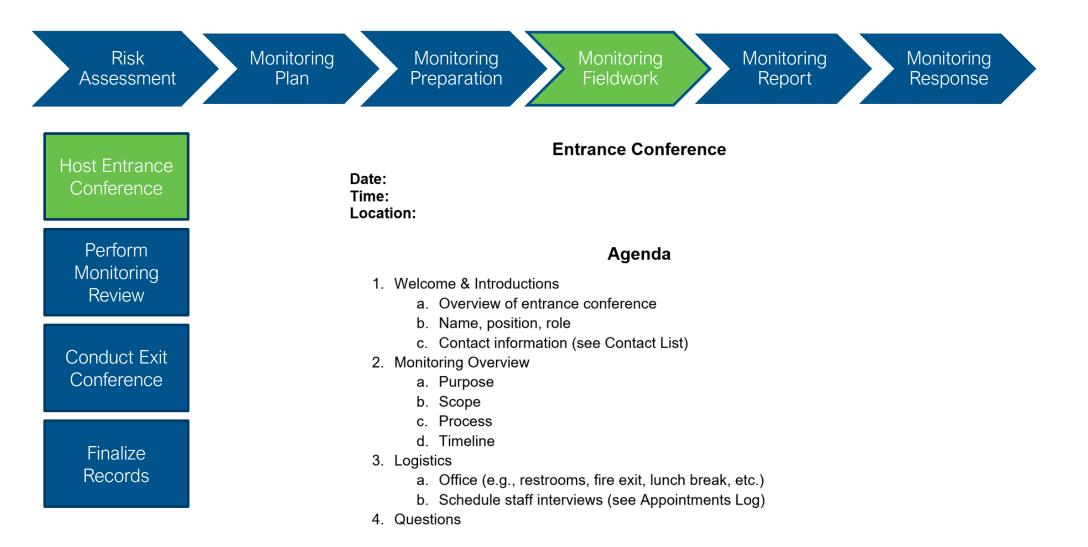


Host Entrance Conference Perform Monitoring Review Conduct Exit Conference Finalize Records

An entrance conference shall be held at the start of the monitoring event to ensure the grantee has a clear understanding of the purpose, scope, and schedule for the monitoring

Confirm key logistics such as availability of key staff and access to the grantee's relevant files









Host Entrance Conference Perform Monitoring Review Conduct Exit Conference Finalize Records

- Complete the Monitoring Checklist(s) by answering each question with a 'Yes', 'No', or 'Not Applicable'
- Each answer must include a written justification for the conclusion
  - Relevant source documentation should be referenced with a copy attached in the monitoring file (especially in circumstances where it substantiates a finding or concern)
  - Where feasible, interview the grantee's staff to assess their understanding of the program requirements and capacity to implement the program in a compliant manner



Host Entrance

Conference

Perform

Monitoring

Review

Conduct Exit

Conference

Finalize Records

#### **Monitoring Fieldwork**



Depending on the area(s) being monitored, CA HCD may need to select a sample of client files to review
 The type of client files subject to review should be based on the parameters of the monitoring event

- Example: if the monitoring is focused on participant eligibility, CA HCD staff should review client files that have been deemed eligible to verify the grantee's eligibility process is compliant with all program requirements
- The number of client files subject to review should be based on the complete list (universe) of all clients reported to date

Client Files (Universe)	Client Files (Sample)
Less than 50 client files	10 client files
Between 50-100 client files	20 client files
More than 100 client files	30 client files





Host Entrance Conference Perform Monitoring Review Conduct Exit Conference Finalize Records

- At the conclusion of the monitoring, CA HCD shall host an exit conference with the grantee's key personnel to discuss any preliminary findings and concerns as well as the next steps in the monitoring process
- For each finding or concern, the grantee will be provided:
  - An opportunity to correct any misunderstandings
  - A preview of the required corrective action that will be included in the **Monitoring Report**





Host Entrance Conference Perform Monitoring Review Conduct Exit Conference Finalize Records Before drafting the Monitoring Report, ensure all questions from the Monitoring Checklist(s) have been answered and are supported by source documentation

All documentation collected prior to, during, and after the monitoring must be saved in the monitoring file





Host Entrance Conference Perform Monitoring Review Conduct Exit Conference Finalize Records

CA HCD will review the monitoring event file to ensure the source documentation supports the conclusions drawn in the Monitoring Checklist(s)

Upon approval, the **Monitoring Plan Tracker** should be updated to reflect the findings, concerns, and observations that will be included in the **Monitoring Report** 

## **Monitoring Report**





Prepare Monitoring Report

- Prepare a draft Monitoring Report to the grantee outlining the results of the monitoring event including:
  - Date of the monitoring
  - Scope of the monitoring review
  - Any findings, concerns, or observations for the grantee
  - Required corrective actions needed
  - Timeline for response

## **Monitoring Report**





Prepare Monitoring Report Issue Monitoring Report Update Records

- CA HCD will review the draft Monitoring Report to ensure all findings and concerns include the condition, criteria, cause, effect and required corrective action
- Once approved, the final Monitoring Report should be issued to the grantee within 30 days after the monitoring review

## **Monitoring Report**





Prepare Monitoring Report Issue Monitoring Report Update Records

- Ensure all necessary documentation and correspondence is maintained in accordance with the Monitoring File Checklist
- Update the Monitoring Plan Tracker to include key information and deadlines associated with each monitoring event, any findings and concerns, and the status of each



Review

Response

Issue Non-

Compliance

Letter

Issue Clearance

Letter

Finalize Records

#### **Monitoring Response**



Grantees have 30 days to respond to all findings in the Monitoring Report, unless otherwise specified

- CA HCD will review the response to ensure the grantee has addressed each finding as described in the corrective action
- If all findings are not adequately addressed, schedule a meeting with the grantee to provide technical assistance and map out a strategy for resolving open findings and concerns



#### **Monitoring Response**



Review Response Issue Non-Compliance Letter Issue Clearance Letter Finalize Records

- If a written response is not received within 30 days of the Monitoring Report being issued, CA HCD will issue a Non-Compliance Letter to the grantee requesting their response within 15 days
- CA HCD may take one or more of the following actions if a grantee fails to correct identified deficiencies:
  - Temporarily withhold reimbursements until findings are addressed
  - Request the repayment of previous reimbursements for disallowed costs
  - Wholly or partly suspend or terminate the award



#### **Monitoring Response**



Review Response Issue Non-Compliance Letter Issue Clearance Letter Finalize Records

- Once all findings have been remediated, prepare a draft Clearance Letter to the grantee
  - If the monitoring did not result in any new findings or concerns, the Monitoring Report will serve as the Clearance Letter
- CA HCD will review the Clearance Letter and the documentation supporting the resolution of the open findings
- Upon approval, send the Clearance Letter to the grantee and update the Monitoring Plan Tracker



#### **Monitoring Response**



Review Response Issue Clearance Letter Issue Non-Compliance Letter Finalize Records

The monitoring event is complete once the following two conditions have been met:

- A Clearance Letter has been issued to the grantee
- The monitoring file contains all correspondence and documentation collected throughout the monitoring process as specified by the **Monitoring File Checklist**



# Thank you for listening



#### **Question & Answer**

