

| Guide for Review of S+C Subrecipient Management |  |      |  |
|---|--|------|--|
| Name of Grantee:                                |  |      |  |
| Staff Consulted:                                |  |      |  |
| 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:** The purpose of this Exhibit is to review the S+C grantee's ability to monitor the day-to-day operations of subrecipients for compliance with applicable Federal requirements and achievement of performance goals identified in the approved grant agreement. For the S+C/SRO component, the subcontract is with a Public Housing Authority. For the S+C/SRA component, the contract is with the nonprofit organization.

**Questions:**

1.

|  |
|--|
| Describe the grantee's procedures for selecting subrecipients (commonly referred to as "sponsors"). (Attach copies of written procedures, if available and as applicable.) |
| <b>Describe Basis for Conclusion:</b>  |

2.

|   |                          |                          |
|---|--------------------------|--------------------------|
| Does the grantee have a management system for the oversight of its subrecipients? (If "yes," briefly describe below and, if written, attach a copy of relevant portions, as appropriate.) | <input type="checkbox"/> | <input type="checkbox"/> |
|   | <b>Yes</b>               | <b>No</b>                |
| <b>Describe Basis for Conclusion:</b>   |                          |                          |

3.

|   |                          |                          |
|---|--------------------------|--------------------------|
| Has the grantee executed written agreements with its subrecipients to carry out activities proposed in the approved grant agreement?<br>[24 CFR 84.5 for nonprofits; 24 CFR 85.5 for units of local government] | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Yes</b> <b>No</b>  |                          |                          |
| <b>Describe Basis for Conclusion:</b>   |                          |                          |
|   |                          |                          |

4.

|  |                          |                          |
|--|--------------------------|--------------------------|
| Does the grantee have a system or method for amending subrecipient agreements? | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Yes</b> <b>No</b>   |                          |                          |
| <b>Describe Basis for Conclusion:</b>  |                          |                          |
|  |                          |                          |

5.

|   |                          |                          |
|---|--------------------------|--------------------------|
| Does the grantee review subrecipients for evidence of conflicts of interest <u>either</u> between the grantee and the subrecipient <u>or</u> between the subrecipient and its contractor(s)?<br>[24 CFR 582.340(b)] | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Yes</b> <b>No</b>  |                          |                          |
| <b>Describe Basis for Conclusion:</b>   |                          |                          |
|   |                          |                          |

6.

|  |                          |                          |
|--|--------------------------|--------------------------|
| Does the grantee have a tracking system or other method of documenting the receipt of Annual Progress Reports (APRs) from its subrecipients? | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Yes</b> <b>No</b>   |                          |                          |
| <b>Describe Basis for Conclusion:</b>  |                          |                          |
|  |                          |                          |

7.

|   |   |
|---|---|
| Does the grantee have a tracking system or other method of documenting the need for, and actual submission of, subrecipient audits? | <input type="checkbox"/> <input type="checkbox"/><br><b>Yes</b> <b>No</b> |
| <b>Describe Basis for Conclusion:</b>   |   |

8.

|  |   |
|--|---|
| a. Does the grantee have a method of determining the need for subrecipient on-site or remote monitoring reviews? | <input type="checkbox"/> <input type="checkbox"/><br><b>Yes</b> <b>No</b> |
| <b>Describe Basis for Conclusion:</b>  |   |

|   |   |
|---|---|
| b. Does the grantee analyze subrecipient performance in assessing compliance monitoring review needs? | <input type="checkbox"/> <input type="checkbox"/><br><b>Yes</b> <b>No</b> |
| <b>Describe Basis for Conclusion:</b>   |   |

9.

|  |   |
|--|---|
| If the grantee uses a risk analysis process for conducting compliance monitoring reviews of its subrecipients, is there evidence that the grantee carries out such reviews in accordance with its own risk analysis process or system? | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br><b>Yes</b> <b>No</b> <b>N/A</b> |
| <b>Describe Basis for Conclusion:</b>  |   |

10.

|   |  |                                       |
|---|--|---------------------------------------|
| Is there documentation reflecting that the grantee takes appropriate and necessary follow-up actions to address subrecipient monitoring conclusions and findings? | <input type="checkbox"/><br><b>Yes</b> | <input type="checkbox"/><br><b>No</b> |
| <b>Describe Basis for Conclusion:</b>   |  |                                       |