

# Monitoring & Technical Assistance Guide for CDBG Public Service & CDBG CV Programs

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*Lake County Community Development*



*City of North Chicago Community Development*



*City of Waukegan CDBG*



- **Ensuring CDBG Public Service funding is used effectively to assist low/moderate income individuals & families**
- **Complying with Federal Regulations and program requirements**
- **Building grantee capacity & improving program performance to assist the residents of Lake County**

#	Requirement	Minimum Standard
<b>Documentation Requirements</b>		
1)	Program maintains adequate documentation to demonstrate participants were low/moderate income (Appendix A contains income limits chart), or that clients meet presumed benefit criteria.	All client files reviewed meet the minimum documentation requirements to demonstrate participants meet the eligibility requirements, or the program has an acceptable documented plan of correction to ensure all new & current clients have the necessary documentation.
2)	Program maintains adequate documentation to demonstrate participants are residents of the grantor's jurisdiction (i.e., Lake County, Waukegan, or North Chicago)	All client files reviewed meet the minimum documentation requirements to demonstrate participants are residents of the grantor's jurisdiction, or the program has an acceptable documented plan of correction to ensure all new & current clients have the necessary documentation.
3)	Program has a recordkeeping system in place to ensure clients are unduplicated and maintains other required demographic information (e.g. age, race, ethnicity)	All client files meet the minimum documentation requirements for other required demographic information, and no client files are duplicated
4)	Policies and procedures are in place to ensure documentation requirements are met.	Policies and procedures are in place and evidence is obtained that they are followed.
<b>CDBG-CV Documentation Requirements</b>		
5)	Program activity helped prevent, prepare for, or respond to COVID-19	Evidence demonstrated activity accomplished outcomes to prevent, prepare for, or respond to COVID-19
6)	Policies and procedures are in place to prevent the Duplication of Benefits	Documentation showed organization avoided Duplication of Benefits in its operations and evidence showed clients did not receive duplicated benefits if organization provided clients direct assistance
<b>Facility</b>		
7)	Facility is clean, secure, and in accordance to HUD Housing Quality Standards (HQS) described in 24 CFR 583.300(b). (Structure & materials, access, space & security, air quality, water supply, sanitary facilities, thermal environment, illumination & electricity, food prep, sanitary conditions, and fire safety)	Facility meets all Housing Quality Standards (HQS) and holds a Certification of Occupancy (when applicable). If the kitchen/dining area is communal, the program posts an appropriate local health certificate (when applicable).

#	Requirement	Minimum Standard
<b>Financial</b>		
8)	Program follows written policies and procedures to maintain adequate oversight and control of its finances to ensure accurate, current, and complete disclosure of financial results. The nonprofit maintains written standards of conduct governing the performance of its employees engaged in the award and administration of contracts.	Program follows written procedures to record financial transactions, determine the reasonableness and allowability of costs, separate duties to ensure no one individual has authority over an entire financial transaction, and routinely compare expenditure & budget.
9)	Expenditures are eligible under the grant agreement / program regulations, are correctly classified, are supported by the general ledger, timesheets, payroll register, invoices, contracts, purchase orders, & receipts, and payment vouchers are submitted at least quarterly.	Payment vouchers are submitted at least quarterly and all expenditures reviewed are eligible, correctly classified, & have sufficient supporting documentation to demonstrate expenditures were incurred & justified. As necessary source documents will be cross referenced with voucher submissions.
10)	Program maintains time sheets that demonstrate salaries that are chargeable to more than one funding source or salaries shared among more than one HUD budget line item are accurately allocated.	For all HUD funded positions, the program maintains time sheets that are signed and dated by the staff member and their supervisor. Time is recorded as actual time engaged in HUD activities (not percentages) and corresponds with billing information.
11)	Program conducts an annual audit by an independent auditor that does not reveal findings or weaknesses that raise concerns about the agency's ability to sustain itself or meet grant obligations.	Most recent annual audit states that financial statements accurately reflect the actual revenues, assets, expenditures, & liabilities and the grantee quickly resolved any audit deficiencies, compliance findings, questioned costs, or recommendations.
12)	Program follows written standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that purchases are managed with good administrative practices and sound business judgment & prohibits conflicts of interest.	Program follows written procurement procedures that specify the steps taken to avoid the purchase of unnecessary items, some form of cost/price analysis for goods and services over an identified amount, and a system in place for tracking property and other assets bought or leased through grant funds.

#	Requirement	Minimum Standard
<b>Progress &amp; Reporting</b>		
<b>13)</b>	Program is progressing as planned in the original application – outcome goals and proposed number of clients served are achievable and within reach	Progress is in line with outcome goals set in application, and actual clients served is in line with proposed number
<b>14)</b>	Quarterly reports are submitted on time with accurate and quality data	Quarterly reports are submitted on time with accurate and quality data
<b>15)</b>	Program is clearly meeting a goal in the Consolidated Plan and has quantifiable data available for performance reporting.	Program demonstrates evidence that Consolidated Plan goal is being met and produces quantifiable quality data for performance reporting

## OTHER FEDERAL REQUIREMENTS:

1. National Affordable Housing Act 24 CFR 576.79; 576.80
2. Fair Housing Act 43 U.S.C. 3601-20; 24CFR part 100 & 107
3. Executive Order 11063
4. Civil Rights Act of 1964 42 U.S.C. 2000d-2000d-4; 24 CFR part 1
5. Age Discrimination Act 42 U.S.C. 61107-07; 24 CFR part 146
6. Rehabilitation Act of 1973 29 U.S.C. 794
7. American’s with Disabilities Act 28 CFR part 36
8. Housing & Urban Development Act of 1968 12 U.S.C 1701U
9. Grantee must make effort to use women and minority owned businesses per Executive Order 11625, 12432, & 12138
10. Lead Based Paint Requirements 24 CFR 576.79
11. Use of facilities and services must be available to all on a nondiscriminatory basis. Grantee must have procedures to make know the availability of facilities and services so it is likely to reach persons of any race, color, religion, sex, age, familial status, national origin, and persons with disabilities.
12. Lead Based Paint requirements 24 CFR 576.79(c)
13. Flood Insurance 24 CFR 576.80(b)
14. Relocation Requirements 24 CFR 576.80(b)
15. Minimize Displacement 24 CFR 576.80(a)
16. Conflict of Interest (24 CFR 675.70(d); 24 CFR 84.42
17. Drug Free Workplace
18. Lobbying & Disclosure of Information Section 1532, Title 31, U.S. Code
19. Primarily Religious Organizations 24 CFR 576.22(b)

# Income Limits Chart

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Low/Moderate Income Limits (as of April 2022):

	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income 0-30%	\$21,900	\$25,000	\$28,150	\$31,250	\$33,750	\$37,190	\$41,910	\$46,630
Very Low Income 31-50%	\$36,500	\$41,700	\$46,900	\$52,100	\$56,300	\$60,450	\$64,650	\$68,800
Low Income 51-80%	\$58,350	\$66,700	\$75,050	\$83,350	\$90,050	\$96,700	\$103,400	\$110,050