



OCD-DRU Compliance & Monitoring

Monitoring and the Compliance Review and Reporting Processes

(Section 12 of the Grantee Admin Manual)



OCD-DRU Compliance & Monitoring Overview

Role of Compliance & Monitoring

- Independence
- Assurance
- Technical Assistance
- Partnership



OCD-DRU Compliance & Monitoring Overview

Annual Grantee Risk Analysis Factors

- Total Number / Complexity of Projects
- Frequency / Proximity of Monitoring
- Funds Expended
- Funds Remaining
- Compliance History



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Monitoring Resources →

Long Term Monitoring Plan / Annual Monitoring Plan

→ Overview / Guide to monitoring OCD-DRU CDBG Programs and Projects, and review selection / prioritization.

Core Checklist

→ Determines if Grantee / Subrecipient's policies and procedures meet minimum requirements...

- Policy and Procedures
- Financial Management System
- Subrecipient Management
- Section 3
- Section 504
- Fair Housing
- Title VI
- Internal Controls

Project Checklist

→ Determines Programmatic / Project compliance and Technical Assistance needs...

- National Objective / Eligibility
- Procurement and Contracts
- Financial Management
- Lead-Based Paint, Asbestos, & Mold
- Acquisition and Relocation
- Monitoring
- Labor
- Section 3
- Property Management
- Environmental



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Compliance & Monitoring Timeline

1) Distribution of Quarterly Schedule —

1st Day of Prior Quarter → Quarterly schedule is distributed on the first day of the quarter immediately prior, complete with C&M staff, and prospective fieldwork dates included.



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Compliance & Monitoring Timeline

2) First contact with Grantee via call —

2 months prior to visit date → Lead Monitor makes initial contact to grantee just to have a high level discussion to confirm field dates, timing, general plan, etc.



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Compliance & Monitoring Timeline

3) Pre-Monitoring Conference Call Conducted —

7 weeks prior to Visit Start Date → Conference call (set up by Lead Monitor) is conducted with full review team. During this call:

- Staff introductions are made (*if necessary*)
- Connectivity / Accommodations are confirmed
- Questions addressed that may impact sample selection. (*Program Income, Subrecipient Involvement / Management, etc.*)



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Compliance & Monitoring Timeline

4) Monitoring Notification Letter Sent —

1 Month prior to Visit Start Date → Monitoring Notification Letter (MNL) is sent to grantee. The MNL formally outlines the following:

- C&M Staff that will conduct the review
- Precise dates of review / time of opening
- Scope of the review
- Specific projects to be reviewed



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Compliance & Monitoring Timeline

5) Prep Meeting is Conducted —

1 to 2 weeks prior to Visit Start Date → The Prep Meeting essentially serves as a debriefing for Program Managers and other Program Staff on all prep work to date. Any potential pitfalls or compliance issues foreseen in advance of fieldwork are disclosed / discussed.



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Compliance & Monitoring Timeline

6) Deadline for Additional Docs —

2 weeks after visit end date → This deadline is communicated to the grantee during the exit conference, which takes place the last day of fieldwork. This is formally communicated primarily to keep the post-fieldwork reporting process moving.



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Compliance & Monitoring Timeline

7) Compliance Roundtable is Conducted —

5 weeks after visit date → The Monitoring Report Form (MRF) is used as a tool by the Lead Monitor to conduct this meeting. The primary reason for the Roundtable meeting is to ensure consistency in risk assessment, issue determination, and reporting. Additionally, knowledge sharing is also a positive byproduct.



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Compliance & Monitoring Timeline

8) Post-Roundtable MRF is delivered —

Shortly after Roundtable adjournment → Once the Roundtable meeting is complete, the Lead Monitor makes any necessary edits to the MRF to reflect the discussion that took place at Roundtable and then distributes the MRF to the appropriate Program Staff. This serves as a courtesy to keep the Program Team abreast of the issues that ultimately will appear in the final Monitoring Report Letter.



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Compliance & Monitoring Timeline

8) Monitoring Report Generation and Distribution—

5 weeks after Visit Date → The respective C&M Staff's finalized version of the Monitoring Report Letter is due to the Compliance Manager for final review, approval, and signature.

2 months after Visit End Date → Our commitment to our grantees is to have the MRL delivery date occur within 2 months of completion of fieldwork.



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Compliance & Monitoring Timeline

9) Grantee Response and Corrective Action—

1 month after report issuance → If any Corrective Actions are required as a result of any compliance determinations, a formal response is requested from the grantee within one month.



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Questions?

