

Section 12

Monitoring

Section 12 – Monitoring

1.0	Introduction.....	213
2.0	Definition of Terms	213
3.0	Monitoring Roles and Responsibilities.....	214
4.0	OCD-DRU’s Monitoring Strategy.....	214
4.1	Notice of Deficiency (Finding).....	215
4.2	Sanctions	215
4.3	Monitoring Report	216
5.0	Recommended Grantee/Direct Subrecipient Monitoring Methodology.....	216
5.1	Grantee/Direct Subrecipient’s Monitoring Coordinator	216
5.2	Monitor	217
5.3	Subrecipient Monitoring Prioritization/Scheduling.....	217
5.4	Project/Program Risk Assessment and Prioritization/Scheduling	217
5.5	Executing the Monitoring Review	219
6.0	Monitoring Tools	220
6.1	Core Checklist.....	221
6.2	Project Checklist.....	221
6.3	Contractor Administration Form.....	224
7.0	Record Keeping	224
8.0	Performance Monitoring.....	224
9.0	Resources	224

Section 12 - Monitoring

1.0 Introduction

Monitoring and evaluation of program performance and compliance by recipients of Disaster Recovery CDBG funds is a requirement of the Department of Housing and Urban Development (HUD). Monitoring program, statutory and/or regulatory requirements is the responsibility of the OCD-DRU, OCD-DRU Grantees, and OCD-DRU Direct Subrecipients. Grantees and Direct Subrecipients are responsible for carrying out their programs to meet these compliance requirements, including monitoring their project administrators, contractors and subcontractors. CDBG regulation (24 CFR 570.501(b)) states that:

“[The Grantee] is responsible for ensuring that CDBG funds are used in accordance with all program requirements. The use of designated public agencies, Subrecipients, or contractors does not relieve the recipient of this responsibility. The recipient is also responsible for determining the adequacy of performance under Subrecipient agreements and procurement contracts, and for taking appropriate action when performance problems arise...”¹

The methodology and tools described within this Section provide guidance to the Grantees and OCD-DRU Direct Subrecipients in developing their own monitoring plan and tools. The OCD-DRU Monitoring Plan closely mirrors the concepts described herein. Once the Grantee or OCD-DRU Subrecipient understands the concepts within this Section, it should develop a Monitoring Plan to review compliance with requirements. A sample monitoring plan is included as Exhibit 12-1. The Exhibits included as 12-2 through 12-6 may be tailored for monitoring any State or Local Grantee (parish or municipality) implemented programs and projects, or Subrecipients of Local Grantees.

2.0 Definition of Terms

The following terms are used throughout this Section:

1. **Binding Agreement** – An agreement that, pursuant to state and HUD regulations, obligates the parties to expend or distribute federal funds and undertake responsibilities as set forth in the agreement.
2. **Concern** – A deficiency in program performance, which should be brought to the attention of the program participant, and if not properly addressed, could become a finding. Sanctions are not issued for concerns, however specific corrective actions for improvement may be issued.
3. **Corrective Action** – Required steps to be taken to resolve findings.
4. **Contract Administrator** – The individual responsible for ensuring that services outlined in the contract are performed adequately, within a specific time frame, and within budget.
5. **Contractor** – An entity competitively selected to provide clearly-specified goods or services. The contract price is established through the procurement process. CDBG funds

¹ **Managing CDBG** A Guidebook for Grantees on Subrecipient Oversight, Chapter 5-2

are paid to the contractor as compensation for the satisfactory provision of the goods and services as specified in the contract.

6. **Deficiency** - An inadequacy based on a statutory, regulatory or program requirement.
7. **Finding(s)** – A violation of statutory, regulatory or program requirement for which sanctions or other required corrective actions are issued.
8. **Grantee** – The Parish or Municipality that has a binding agreement in place with the OCD-DRU to administer the Disaster Recovery CDBG program(s) and/or project(s).
9. **Monitored Entity** – The entity that is evaluated during a monitoring review.
10. **Project/Program** – The housing, infrastructure, economic development, or planning endeavor undertaken by the Grantee.
11. **Recommendation** – A specific course of action issued for concerns that details areas of improvement in program performance.
12. **Subrecipient** – A public or private nonprofit agency, authority or organization that is provided CDBG funds through a State or Local Grantee for use in carrying out agreed-upon eligible activities.

3.0 Monitoring Roles and Responsibilities

Monitoring is the responsibility of the OCD-DRU and its Grantees and Subrecipients. The OCD-DRU, Grantees, and OCD-DRU Direct Subrecipients must monitor to ensure compliance with executed agreements, applicable state and federal laws and regulations, and project/program performance criteria. See Table 1 below, for a description of the monitoring responsibilities.

Table 1 Monitoring Responsibilities

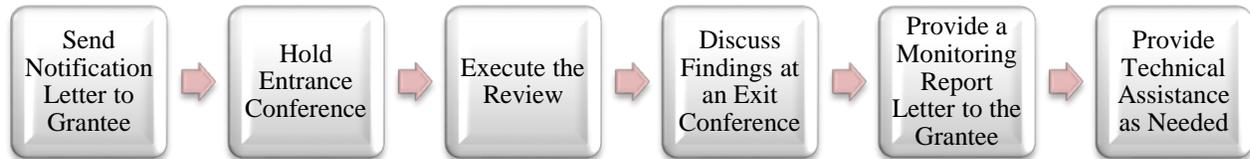
Monitor	Monitored Entity
OCD-DRU	<ul style="list-style-type: none"> • Grantees, including a sample of the Grantee’s Projects • Direct Subrecipients, including a sample of the direct Subrecipient’s Projects • Program/Project administrators
OCD-DRU’s Direct Subrecipient	<ul style="list-style-type: none"> • Direct Subrecipient’s Programs/Projects • Program/Project administrators, contractors, and subcontractors
Grantee	<ul style="list-style-type: none"> • Grantee’s Programs/Projects • Grantee’s Subrecipient, including a sample of the Subrecipients Programs/Projects • Program/Project administrators, contractors, and subcontractors
Grantee’s Subrecipient	<ul style="list-style-type: none"> • Subrecipient’s Programs/Projects • Program/Project administrators, contractors, and subcontractors

4.0 OCD-DRU’s Monitoring Strategy

The OCD-DRU staff may perform a desk review or onsite monitoring of the Grantee or Direct Subrecipient at any time. A review may be a comprehensive program evaluation or it may be oriented toward assessing performance in specific areas. In either case, the Grantee/Direct

Subrecipient should cooperate with the OCD-DRU staff and provide them with all records and files pertaining to the program, as well as any other information requested. The OCD-DRU will use Checklists similar to Exhibits 12-3 and 12-4 to monitor the Grantee, the Grantee's projects, and OCD-DRU Direct Subrecipients.

An overview of OCD-DRU's monitoring strategy is illustrated in the following diagram:



Generally, the OCD-DRU will notify the Grantee/Direct Subrecipient thirty days prior to beginning a review. An entrance conference will be conducted to begin the monitoring review. Once the review is completed, the OCD-DRU will sit down to discuss their findings in an exit conference; it is desirable that the chief elected official be present for this conference.

The OCD-DRU staff, to the extent possible, will work with the Grantee/Direct Subrecipient on site to correct any problems. Any problems that cannot be corrected will be discussed in a monitoring report letter. The letter will identify areas of merit, any concerns or deficiencies, and findings or corrective actions. A concern is a deficiency in program performance not based on a statutory, regulatory or other program requirement. Sanctions are not necessarily issued for concerns. A Finding is a violation of a statutory, regulatory or program requirement for which sanctions or other corrective actions are issued.

4.1 Notice of Deficiency (Finding)

In the event findings are identified during OCD-DRU's monitoring activities, corrective procedures will be executed. The first step in the corrective procedure is for the Office of Community Development to send a written Notice of Finding(s) to the grant recipient via a monitoring report. The report will describe the deficiency specifically and objectively, describe actions the grant recipient must take in order to remedy the finding, and a deadline for doing so, and describe the consequences for failure to remedy the finding (i.e. administrative sanctions or legal action).

4.2 Sanctions

If a finding remains uncorrected, one or more sanctions will be imposed. The choice of the sanction(s) to be issued is governed by the objectives identified in the Introduction, the type of deficiency, and the seriousness of the deficiency. Possible sanctions include, but are not limited to:

1. Required administrative change: For example, if the consultant administering the program is doing a poor job, but the grant recipient as the continuing capacity to administer the grant, the grant recipient may be required to discharge the consultant and engage someone else to administer the program.
2. Suspension of grant payments.
3. Reduction of grant amount.
4. Termination of grant.

5. Reimbursement of costs disallowed by the Office of Community Development.
6. Disqualification from consideration for other CDBG-DR funds.
7. Legal action pursued by the State.

If the grant recipient does not address the cited problem after having been sanctioned, additional sanctions may be imposed, or the matter may be referred for legal action.

4.3 Monitoring Report

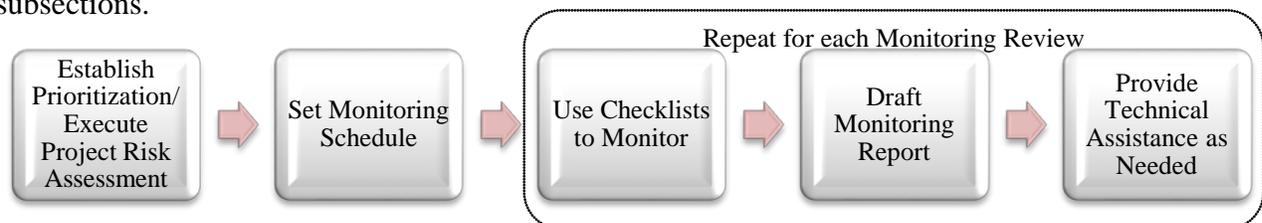
The monitoring report letter becomes a part of the record at the OCD-DRU. Accordingly, it is to the Grantee's/Direct Subrecipient's advantage to minimize the number and scope of negative findings.

The OCD-DRU generally allows the Grantee/Direct Subrecipient thirty to forty-five days to respond to any findings noted in the letter. The Grantee must describe the steps taken to resolve the findings (corrective actions) or provide new information/clarification not reviewed during the monitoring visit. The corrective actions should generally follow the recommendations made by the OCD-DRU staff. The OCD-DRU staff will inform the Grantee/Direct Subrecipient if the response is sufficient to permit them to clear the findings or resolve any concerns or deficiencies. All findings from monitoring visits must be cleared prior to program/project close-out.

Generally, the OCD-DRU will not monitor programs/projects administered by a Grantee's Subrecipient. Monitoring of the Subrecipient's programs/projects is the responsibility of the Grantee. However, if the OCD-DRU determines that a Grantee has not performed adequate Subrecipient monitoring, the OCD-DRU may engage the Grantee to monitor a sample of the Subrecipient programs/projects.

5.0 Recommended Grantee/Direct Subrecipient Monitoring Methodology

Monitoring priority and frequency should be risk-based. The Grantee/Direct Subrecipient's monitoring plan should include the use of desk reviews and onsite monitoring. Using the tools described in Subsection 7, the Monitor should sample program, project, contractor, or Subrecipient documentation to draw conclusions about performance and capacity. An overview of the Monitoring process is illustrated in the following diagram and discussed in the following subsections.



5.1 Grantee/Direct Subrecipient's Monitoring Coordinator

The Grantee/Direct Subrecipient should assign a Monitoring Coordinator to ensure all monitoring efforts are performed according to the Grantee/Direct Subrecipient's Monitoring Plan (a sample is included as Exhibit 12-1). The Monitoring Coordinator's responsibilities include:

1. Ensuring that subrecipients and contractors/ consultants are monitored soon after the contract is executed;
2. Ensuring that risk assessments are executed;
3. Prioritizing reviews and setting the Monitoring schedule based on the results of the risk assessments;
4. Ensuring proper documentation and tracking of all monitoring efforts;
5. Notifying OCD-DRU of severe issues;
6. Engaging OCD-DRU for necessary technical assistance; and,
7. Ensuring Monitoring occurs as outlined within the Grantee/Direct Subrecipient’s Monitoring Plan

If the Grantee/Direct Subrecipient has engaged an administrative consultant and the Grantee/Direct Subrecipient’s Monitoring Coordinator is the administrative consultant, the Grantee/Direct Subrecipient must identify a contract administrator responsible for monitoring the administrative consultant.

5.2 Monitor

The Monitor is responsible for:

1. Executing the monitoring checklist(s);
2. Identifying issues, corrective actions or technical assistance needed;
3. Confirming performance, recommending appropriate corrective action, confirming development of corrective action plan and following up to assure resolution of the Monitored entity;
4. Drafting the Monitoring Report, including providing the Report to the applicable parties; and,
5. Maintaining documentation of all monitoring efforts within the applicable file.

5.3 Subrecipient Monitoring Prioritization/Scheduling

HUD guidance and experience has shown that activities undertaken by Subrecipients are potentially high risk. Therefore, if a jurisdiction is implementing a program/project through a Subrecipient, the program/project should be considered high risk and should not use a risk assessment to classify their Subrecipients. Grantees should focus their attention on Subrecipient oversight by monitoring the Subrecipient as soon as possible once the binding agreement has been executed. The purpose of this review is to verify initial performance and identify any technical assistance needs.

The Core Checklist described in Subsection 6.1 and included as Exhibit 12-3 should be used to monitor the Subrecipient during this first review. Once the Subrecipient has been monitored using the Core Checklist, the Grantee should review a sample of the Subrecipient’s projects (see Subsection 6.2.1) using the Project Checklist (see subsection 6.2).

5.4 Project/Program Risk Assessment and Prioritization/Scheduling

At least one onsite review must be performed for each of the Grantee/Direct Subrecipient’s projects/ programs prior to closeout. The Grantee/Direct Subrecipient should prioritize these

reviews based on the results of the risk assessment described in Table 2. The risk assessment template that should be used is included as Exhibit 12-2.

If the Grantee/Direct Subrecipient has engaged a Subrecipient, the Grantee should **review a sample** of the Subrecipients projects, as described in Subsection 6.2.1.

Table 2 Project/ Program Risk Assessment

Criteria	Description	High Risk	Medium Risk	Low Risk
Total DR-CDBG Allocation	The total DR-CDBG provided to execute the project.	5	3	1
		\$250,000 +	\$150,000 - \$249,999	Less than \$149,999
Complexity	The activities associated with the project or program	5	3	1
		Project Involving Construction	Loan or Grant Project	Other type of Project
Implementation	The entity who is implementing the project.	12	8	4
		Subrecipient	Grantee Staff	Consultant
Relevant Experience	The entity who is implementing the project or program's experience implementing a similar type project or program.	8 No Experience	5 Some Experience	3
				Significant Experience

High Risk: 30 – 22 Points Medium Risk: 21- 15 Points Low Risk : Less than 15 Points

To execute a risk assessment the following steps should be followed:

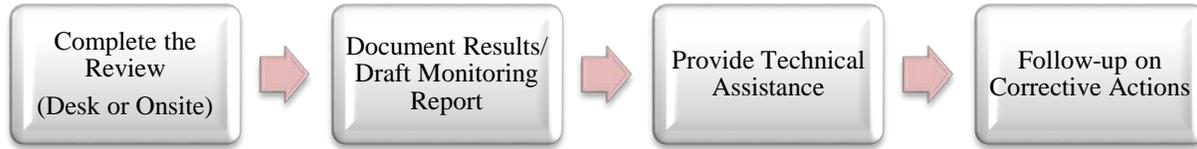
1. Each criterion should be scored as high, medium, or low risk for each project
2. Combine the risk criterion scores for each entity within the set to determine the overall risk level.

Once the Grantee/Direct Subrecipient has completed the risk assessment for all projects/programs, the monitoring reviews should be prioritized so that Grantee/Direct Subrecipient high risk projects/ programs are monitored first (after any Subrecipients are monitored). Prior to closeout, at least one onsite review should be conducted of all programs/projects implemented by the Grantee/Direct Subrecipient. Project/program monitoring should occur early enough during program/project execution to provide adequate time for technical assistance and/or corrective action resolution to be completed.

After the first review, additional monitoring should be conducted until closeout. If deficiencies are noted during a monitoring review, the Grantee/Direct Subrecipient should follow-up with additional reviews in the deficient area(s). Additionally, high risk projects should be given consideration when performing additional reviews.

5.5 Executing the Monitoring Review

The steps illustrated in the diagram below and described in the subsequent sections provide the high level process for executing a monitoring review. The roles and responsibilities associated with these steps are described within Subsection 3, Monitoring Roles and Responsibilities.



5.5.1 Desk Review

A desk review assesses compliance with program, contractual, HUD, CDBG, and other federal, state and local requirements. A desk review can assist with identifying potential problems early, preventing compliance violations, helping improve performance, and establishing a working relationship. The Monitor may use the Monitoring tools included as Exhibits 12-3 through 12-5 for desk reviews. These checklists are described in Subsection 6.

Risk assessment results may be used to identify specific areas of concern and to determine the frequency of desk reviews.

5.5.2 Onsite Monitoring

Onsite monitoring activities are those activities conducted at a site where the program/project records are maintained, production occurs, or both. Onsite monitoring is an effective way to validate desk review results, identify and/or research discrepancies, and more closely monitor high-risk program components.

During the onsite visit, the Monitor should review the files for compliance with all applicable federal and program requirements. The Monitor should also use the information collected during previous desk reviews, such as employee time sheets, financial statements, position descriptions, and policy and procedures manuals provided by the organizations, to prepare for onsite visits. The checklists included as Exhibits 12-3 and 12-4 contain specific questions applicable to onsite monitoring. These checklists are described in Subsection 6.

5.5.3 Monitoring Report

As a result of the Monitoring review, the Monitor may reach one or more of the following conclusions:

1. Performance was adequate or exemplary;
2. There were significant achievements;
3. There were concerns that need to be brought to the attention of the program participant;
4. Technical assistance was provided or is needed; and/or,
5. There were findings that require corrective actions.

Upon completion of the Monitoring review, the Monitor should prepare a Monitoring Report that describes the results – in sufficient detail – of the areas that were covered and the basis for the conclusions. The Monitoring Report should recognize areas of merit and fully document every deficiency. In the event that deficiencies are found, the Monitor should include the condition,

criteria, cause, effect, and required follow-up corrective actions, if necessary. A Monitoring Report Template is included as Exhibit 12-6.

The Monitoring Report for a Core Review should be provided to the Subrecipient and maintained in the Subrecipient file. Additionally, the Monitoring Report for a Project Review should be maintained in the applicable file.

In the event that severe deficiencies are revealed, the Monitoring Coordinator should contact OCD-DRU for guidance.

5.5.4 Technical Assistance

When deficiencies are identified as a result of the Monitoring, technical assistance may be required to assist in the resolution of the deficiency. The objective of technical assistance is to aid the Monitored Entity in their day-to-day compliance with HUD and state regulations, and program requirements as they administer their individual programs. The nature and extent of technical assistance should be determined at the discretion of the Monitor. Some examples of technical assistance may include:

1. Verbal or written advice;
2. Formal training; and/or,
3. Documentation and guidance.

The Monitoring Coordinator should contact OCD-DRU if assistance is needed when providing technical assistance.

5.5.5 Follow-Up

In the event that deficiencies are identified during the Monitoring review, follow-up actions should be scheduled to address the progress of the proposed resolution. The timing and frequency of the follow-up communication and activities should be determined at the discretion of the Monitor and should be based on the severity of the deficiency.

If previous deficiencies remain unresolved or uncorrected, these issues will also require follow-up activity. All follow-up actions should be documented and communicated. Target dates should be assigned for resolution of deficiencies.

6.0 Monitoring Tools

There are three monitoring tools included as Exhibits to this OCD Disaster Recovery CDBG Grantee Administrative Manual:

1. Core Checklist – Exhibit 12-3
2. Project Checklist – Exhibit 12-4
3. Contract Administration Form – Exhibit 12-5

These tools are described in Subsections 6.1-6.3. The activities associated with a contractor, Subrecipient, project, or program determines which sections of these checklists are used for each review.

Additionally, when considering contractors, the same federal, state, local and CDBG administrative and monitoring requirements that apply to Subrecipients may not apply to a contracted entity.

6.1 Core Checklist

The Grantee/Direct Subrecipient should use the Core Checklist (Exhibit 12-3) during all Subrecipient reviews. The OCD-DRU will use the Core Checklist to monitor the Grantees/Direct Subrecipients. The primary functions of the Core Checklist are to determine if policies and procedures meet minimum requirements and to verify the adequacy of the financial management system, and civil rights compliance. The Core Checklist includes a review of the following areas:

1. Financial management policies and procedures;
2. Procurement policies and procedures;
3. Contracting policies and procedures;
4. Monitoring policies and procedures;
5. Financial management system validation; and,
6. Civil Rights compliance.

The Monitor may use the Policies and Procedures sections of the Core Checklist to identify technical assistance needs as early in the program/project implementation as possible.

6.2 Project Checklist

The Monitor should use the Project Checklist, included as Exhibit 12-4, to review 100% of their projects at least once prior to closeout. It should also be used to review a sample of the Subrecipient's projects (see Subsection 6.2.1). The project checklist can be used as both a desk and onsite checklist. Since the activities associated with a project and with a contract vary, all sections of the Project Checklist may not be applicable for each project and associated contract/contractor.

The Project Checklist is comprised of questions related to each of the following compliance areas:

1. Citizen Participation;
2. Financial Management;
3. Procurement;
4. Contracting;
5. Labor;
6. Civil Rights;
7. Environmental Review;

- 8. Acquisition and Relocation;
- 9. Property Management; and,
- 10. Monitoring.
- 11. Lead-Based Paint, Asbestos, and Mold
- 12. National Objective and Eligible Activities

6.2.1 Selecting a Sample of the Subrecipient’s Projects

The Grantee/Direct Subrecipient should review a sample of the Subrecipient’s projects. The following guidelines may be followed to determine the quantity and types of projects to include within the sample.

- 1. Project samples should include a minimum of four Subrecipient Projects.
 - a. If the Subrecipient is implementing four or less projects, all projects should be reviewed.
- 2. No less than one project from each program activity category (housing, infrastructure, economic development, planning) should be selected, if feasible.
 - a. If the Subrecipient does not administer projects that fall within each of the four program categories, the Grantee should document the methodology for selecting the four projects included within the sample.

Additional projects may be added to this selection using a Non-Random Selection Method by:

- 1. Examining more projects from a specific category;
- 2. Selecting additional projects to include one from each Grantee/Direct Subrecipient staff person responsible for project oversight;
- 3. Including additional projects with the same characteristics, if indicated by the severity or nature of any problems(s) noted during previous reviews (for example, same problem category, same parish staff person, same activities or other characteristics);
- 4. Including projects with expanded scope or funding, activities considered high risk, and/or unresolved past findings or concerns.

Sample selection can be performed with the assistance of off-the-shelf software (e.g., random number generators, MS Excel function – RAND (random number generator)) to randomly select a sample of projects from a population. The following example illustrates how to determine how to select the project sample for a review.

Table 3 Example: Selecting the Project Sample for Subrecipient Monitoring

Subrecipient 1	Subrecipient 2	Subrecipient 3
3 Housing Projects, 5 Infrastructure Projects, 2 Planning Projects <i>Select 1 Housing Project, 2 Infrastructure Projects, and 1 Planning Project</i>	Fifteen Infrastructure Projects <i>Select 4; broaden sample if deficiencies are revealed</i>	One Housing Project/Program <i>Review the one Housing Project/ Program</i>

As time and resources permit, the Grantee/Direct Subrecipient should continue to monitor the Subrecipient’s projects by selecting an additional sample and performing the review. The sample

should, to the extent feasible, be different for each review performed. The following exceptions should be noted:

1. Projects that are monitored and result in a high number of unresolved concerns and findings should be included within subsequent reviews.
2. Projects selected through random sampling may be replaced in cases where they either have not started or have progressed within the life of the project.

6.2.2 Sampling for the Project Checklist

The first step in completing the Project Checklist is to select a sample of contractors and execute the Project Worksheets. Project Worksheets (included as a part of the project checklist, Exhibit 12-4b) may be used to draw conclusions regarding procurement, contracting, labor, and Section 3 compliance for each project.

Contractor Sample

For each project, the Monitor should select a minimum of two contractors to be reviewed. If only one contractor is engaged, only one contractor is required to be reviewed. The procurement, contracts, invoices, and other documentation associated with the project and contractors will be reviewed to test the Grantee/Direct Subrecipient’s administrative systems. The reasoning for selecting the contractors within the sample should be documented. If a project undergoes more than one review, each review cycle should include different contractors, as applicable. The Monitor always has the option to expand the sample size to include additional contractors for initial testing or retesting.

If the Grantee/Direct Subrecipient has not engaged any contractors to execute the project (i.e. they are performing the work “in-house”), the responses to the applicable Project Worksheet questions should be based on the “in-house” activities. Table 4 provides an example for selecting the Contractor Sample.

Table 4 Example: Selecting the Contractor Sample

Project 1	Project 2	Project 3 (in house)
Contractor A, Contractor B, Contractor C	Contractor A	Public Works Division
<i>Select two contractors to execute the Project Worksheets</i>	<i>Execute the Project Worksheets for the one contractor.</i>	<i>Execute the Project Worksheets, reviewing the Public Works Department’s Records.</i>

Selecting an Invoice Sample to Review

The Project Checklist requires the Monitor to select a sample of invoices for each contractor being reviewed. The Monitor should use Table 5 to determine the appropriate sample size for monitoring program-processing activities (e.g., closings, applicant file reviews, etc.).

Table 5 Sampling for Transaction-Based Activities²

Population	>200	100-199	50-99	20-49	Less than 20
Minimum Sample Size	65	20	10	5	3

²Appendix “A” of HUD Handbook 2000.04 REV-2 CHG-7

The example below illustrates how to select invoices for using the methodology described in Table 5.

Table 6 Example: Selecting an Invoice Sample

Project 1		Project 2	Project 3 (in house)
Contractor A	Contractor C	Contractor A	Public Works Division
21 invoices submitted	51 invoices submitted	2 invoices submitted	107 timesheet entries/receipts for the Project have been included in the Grantee’s Draw Request
<i>Select 5 to reivew</i>	<i>Select 10 to review</i>	<i>Review both invoices</i>	<i>Review 20 of the timesheet entries/receipts</i>

6.3 Contractor Administration Form

Ensuring that contractors comply with the terms of their contracts is a requirement under 24 CFR 85.36 (b) (2). This regulation requires that Grantees/Direct Subrecipients “maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.”

Contractors procured to implement a specific project (i.e. construction contracts) are reviewed during the Project Review. However, for consultants or other vendors procured to assist with the implementation of multiple projects, the Grantee/Direct Subrecipient may use the Contract Administration Template included as Exhibit 12-5 to track performance with the executed contract.

7.0 Record Keeping

The Grantee/Direct Subrecipient should document its monitoring efforts and maintain those documents in the applicable Subrecipient, project, or program file. See Section 4 “Records Management” of the OCD Disaster Recovery CDBG Grantee Administrative Manual.

8.0 Performance Monitoring

Given the number and type of projects administered by a single entity can be numerous and complex, it often becomes difficult to plan for each project’s implementation. Projects may take years to come to fruition once approved due to a lack of planning and oversight. Grantees/Direct Subrecipients are encouraged to establish goals and timelines within their projects (i.e. performance measures) and track the project’s performance against those goals. Performance measurement will help Grantees/Direct Subrecipients enhance program capacity and performance.

9.0 Resources

Exhibit	Description
Exhibit 12-1	Sample Grantee Monitoring Plan
Exhibit 12-2	Project/Program Risk Assessment Template
Exhibit 12-3	Core Checklist Template
Exhibit 12-4	Project Checklist Template & Project Worksheets
Exhibit 12-5	Contract Administration Form
Exhibit 12-6	Monitoring Report Template