

COMMISSIONERS OF WAYNE COUNTY

BRIAN W. SMITH, CHAIRMAN
Damascus Township, PA

JOSEPH W. ADAMS
Salem Township, PA

JOCELYN CRAMER
Damascus Township, PA



ANDREW M. SEDER
Chief Clerk

WENDELL R. KAY
Solicitor

Wayne County

Subrecipient Oversight Policies and Procedures

May 19, 2022

Wayne County shall oversee and monitor all subrecipients in accordance with 2 CFR Part 200, 24 CFR Part 85, OMB guidance dated December 26, 2013, Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight (HUD, March 2005), Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems (HUD, updated February 2022), and all relevant federal and state guidelines and regulations.

Monitoring Goals

The goals of monitoring are to partner with subrecipients to ensure they:

1. Comply with all regulations governing their administrative, financial, and programmatic operations; and
2. Achieve their performance objectives on schedule and within budget.

Pre-Activity Risk Assessment

Prior to awarding funds, Wayne County will assess the capacity of the applicant to administer and implement the program as well as the compliance of the activity with CDBG rules and regulations to ensure that federal funding is not put at risk.

Orientation

Once funds are awarded, the County will meet with subrecipients to review the terms of the subrecipient agreement including CDBG and other relevant federal regulations, the activity work plan, anticipated outcomes, managing beneficiary data, and reporting requirements. During this meeting, the

COMMISSIONERS OF WAYNE COUNTY

County will answer questions and encourage subrecipients to contact the County if any questions or challenges arise. The County will provide another orientation session if subrecipient staff changes during the term of the agreement.

All subrecipients are given a copy of *Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems* (February 2022) which is included as an exhibit in subrecipient agreements.

Reporting

All subrecipients will submit a formal report at least quarterly during the term of the agreement. Reports will include a financial and programmatic summary, receipts, and participant surveys for new beneficiaries served during the reporting period.

The County will review quarterly reports as they are submitted and resolve discrepancies or inaccuracies with subrecipients on an ongoing basis.

Technical Assistance

Technical Assistance will be available to subrecipients on an ongoing basis through the County or its designee.

Monitoring

At least once a year, the County will formally monitor all public services subrecipients that have an open agreement with the County.

In addition, the County may formally monitor non-public services subrecipients as deemed necessary. The selection of such subrecipients will be based on the following criteria:

- Timeliness, completeness, and accuracy of required reports
- Complexity of the activity
- Capacity of the subrecipient
- Turnover of key staff
- Results of prior monitorings

COMMISSIONERS OF WAYNE COUNTY

- News related to the subrecipient or activity
- Citizen complaints

When a non-public services subrecipient is selected for a monitoring, the reason for this selection will be documented in the subrecipient file.

All public services activity monitoring will be conducted on site unless mitigating factors, such as the COVID-19 pandemic, make an on site monitoring impossible. Non-public services activities may be monitored either on site or remotely depending on the level or risk with riskier activities monitored in person.

Monitoring visits will begin with an entrance conference during which the County or its designee will review the goals for the monitoring. The County will then review documentation provided by the subrecipient. At the end of the monitoring, an exit conference will be held to review findings and discuss next steps.

Preparing for Monitoring Meetings

Before monitoring a subrecipient, the County or its designee will carefully review the:

- Original application
- Subrecipient agreement
- Reports
- Drawdown requests
- Documentation from previous monitoring meetings

Pre-Monitoring Communication

At least one week before a scheduled monitoring, subrecipients will be sent a letter to confirm the date, time, and location of the meeting. This letter will include a copy of the monitoring checklist.

Post-Monitoring Communication

After a monitoring occurs, subrecipients will be sent a letter and written report which includes findings, recommendations for improvement, and required corrective actions. This letter and report will be sent

COMMISSIONERS OF WAYNE COUNTY

to the subrecipient within 30 days of the monitoring. If corrective actions are required, the report will include a date by which changes are expected. The County will follow-up with subrecipients to offer technical assistance and to ensure that corrective actions are completed on time.

COMMISSIONERS OF WAYNE COUNTY

Wayne County Community Development Block Grant

Monitoring Checklist

Public Service Activities

Subrecipient	
Date of Monitoring	
Monitoring Facilitator	

	Status	Notes
Subrecipient Agreement		
Scope of services is implemented as described in the agreement		
Performance goals are met		
Work is performed in a timely manner		
Expenditures reflect budget		
Requests for payment are accurate and submitted on time		
Reports are accurate and submitted on time		
Recordkeeping		
Beneficiary records are secure, confidential, orderly, and up to date		
Beneficiary surveys are complete		

COMMISSIONERS OF WAYNE COUNTY

Financial Management		
Financial reports reflect expenditures and reports		
Invoices and receipts match reported expenditures		
Internal controls are in place		
All costs are reasonable, eligible, and allocable		
Checks are promptly deposited		
Insurance		
Current COI on file for County		
Current COI on file for State		
Procurement		
Subrecipient followed County procurement policies and procedures		
Equipment and Real Property		
Acquired or improved property in excess of \$25,000 complies with 570.503(b)(7)		
Equipment purchased in excess of \$1,000 complies with 84.34		
Physical inventory taken within past 2 years		
Disposal of Property or Equipment within Past 5 Years		
Proceeds from the sale were reported as program income		

COMMISSIONERS OF WAYNE COUNTY

County approved expenditure of program income or program income was returned to the County		
Non-Discrimination and Fair Housing		
Complies with Equal Employment Opportunity		
Complies with Section 3		
Complies with Fair Housing Requirements		
Complies with Section 504		
Affirmative Steps Taken to Procure through Woman- and Minority-Owned Businesses		
Drug-Free Workplace Poster		

Please have the following items available at the beginning of your monitoring visit:

- All beneficiary files
- Receipts, payroll records, etc. for CDBG expenditures
- Most recent audit and internal financial statements
- Fiscal policies (i.e. internal controls)
- Chart of accounts
- Annual budget
- Procurement records, if applicable
- Employee policies
- Program policies and forms

COMMISSIONERS OF WAYNE COUNTY

Wayne County Community Development Block Grant

Monitoring Report

Public Service Activities

Subrecipient	
Date of Monitoring	
Date of Report	
Monitoring Facilitator	

Commendations:

Concerns and Recommendations:

Corrective Actions:

Finding	Action(s) to Take	Date to be Resolved

Additional information about these findings can be found in the attached monitoring letter.

COMMISSIONERS OF WAYNE COUNTY

APPROVED this _____ day of _____, 2022.

Attest:

Signatures:

Andrew Seder, Chief Clerk Date

Brian W. Smith, Chairman Date

Joseph W. Adams, Commissioner Date

Jocelyn Cramer, Commissioner Date