



Community Development
Community Development Block Grant (CDBG) Program
Subrecipient Monitoring Checklist

I. Subrecipient Information

Date of Monitoring 3/9/2021 Time: Desktop

Subrecipient: YWCA

Address: 3219 Commerce Street

Phone: 608-791-3882

Person(s) Interviewed: Tennille Spears

Project Location: La Crosse, WI (Ruth House)

Project Name: Ruth House – Emergency Shelter to Homeless Women

Funding Amount: \$15,000 Reviewer: Caroline Gregerson

Project Description: Since 2005 Ruth House has provided emergency shelter to homeless women transitioning out of substance abuse treatment and/or homeless women still actively engaged in local (La Crosse) treatment. Residents can stay a maximum of 90 days, though some residents achieve independence sooner.

II. Performance Evaluation Review

A. ACTIVITY ELIGIBILITY:

1. Public Facilities and Improvements of: n/a

- | | |
|---------------------------------------------------|---------------------------------------------------------|
| <input type="checkbox"/> Senior Housing | <input type="checkbox"/> Handicapped Centers |
| <input type="checkbox"/> Homeless Centers | <input type="checkbox"/> Youth Centers |
| <input type="checkbox"/> Neighborhoods Facilities | <input type="checkbox"/> Sidewalks |
| <input type="checkbox"/> Streets | <input type="checkbox"/> Parks, Recreational Facilities |

2. Providing Public or Community Services for:

- | | |
|-----------------------------------------------------|----------------------------------------------------|
| <input type="checkbox"/> Seniors | <input type="checkbox"/> Substance Abuse |
| <input type="checkbox"/> Handicapped | <input type="checkbox"/> Battered & Abused Spouses |
| X Homeless | <input type="checkbox"/> Employment Training |
| <input type="checkbox"/> Housing | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Tenant/Landlord Counseling | <input type="checkbox"/> Abused Children |

3. Code Enforcement ☐

4. Planning ☐

5. Administration ☐

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A. NATIONAL OBJECTIVE CFR 570.208

- LOW/MOD: Low/Mod - LMC_____
- SLUM/BLIGHT: _____
- URGENT NEED- Reason: _____

National Objective			Verification Source/Comments
LOW/MOD			
1. How does project comply with applicable project criteria & record keeping requirements for serving the needs of low/mod income persons?			
a. Area Benefit 570.208(a)(1)			
b. Limited Clientele – Type 570.208(a)(2)			
c. Housing Activity 570.208(a)(3)			
	Compliance Yes No	Verification Source/Comments	
B. ENVIRONMENTAL REVIEWS			
1. Environmental review in the City File?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	S:Drive under CDBG ERR 2020–verified 2/23/2021
2. Funds obligated only after release of funds notice?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes.
C. PROJECT PERFORMANCE			
1. What are contract objectives?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6 women provided transitional housing and case management services. Significant decrease from their original proposal. This is due to Covid-19, less interest in remaining sober. Actually served to date was 9.
2. Does Subrecipients reporting match information on file?	<input type="checkbox"/>	<input type="checkbox"/>	Subrecipient report shows 10 to date, 9 white 1 Asian, 1 white and Hispanic, 9 EL, 1 low. Examined copies of files. Actually served was 7 white, 1 Asian, 1 American Indian, 0 hispanic, 7 EL, 2 Low. Grantee will re-submit accurate reports for final report.

Timeliness

1. Is project proceeding according to established time line? ☒ ☐
2. What is the current status of the project?
N/A

Policy

National Objective		Verification Source/Comments	
1.	1. Were there any activities that violate prohibition against religious activities? 570.200(j)	<input checked="" type="checkbox"/>	<input type="checkbox"/> Viewed performance report.
2.	Were there any activities that violate prohibition against political activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/> View of files and performance report.
3.	Is there a drug free workplace policy?	<input checked="" type="checkbox"/>	<input type="checkbox"/> Yes, viewed in their policies and procedures handbook.
4.	City file includes copies of nonprofit status and current list of Board of Directors?	<input checked="" type="checkbox"/>	<input type="checkbox"/> Uploaded in Zoomgrants

		Compliance		Verification
		Yes	No	Source/Comments
D. RECORD KEEPING				
1.	Is the filing system orderly, comprehensive? 570.506	<input type="checkbox"/>	<input type="checkbox"/>	<i>Interview</i>
2.	Are records available for review by the public and appropriate agencies as regards to CDBG activities? 570.508	<input type="checkbox"/>	<input type="checkbox"/>	<i>Interview</i>
3.	Are security procedures in place to assure confidentiality and safety?	<input type="checkbox"/>	<input type="checkbox"/>	<i>Interview</i>
4.	Are information systems in place to collect performance report data where required? 570.506			<i>Interview</i>
	a. Physical	<input type="checkbox"/>	<input type="checkbox"/>	N/A
	b. low/mod income	<input type="checkbox"/>	<input type="checkbox"/>	
	c. fair housing action (g)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
	d. minority data(g)(2)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
	e. housing data	<input type="checkbox"/>	<input type="checkbox"/>	N/A
	f. citizen participation	<input type="checkbox"/>	<input type="checkbox"/>	N/A
5.	Separate file for each client?	<input type="checkbox"/>	<input type="checkbox"/>	View program records
6.	Are client files in agreement with reports submitted?	<input type="checkbox"/>	X	Off by one, due to La Crosse County utilizing the facility during Covid-19.
7.	Are reports maintained for 3 years after project completion? 2 CFR 200.333	<input type="checkbox"/>	<input type="checkbox"/>	Interview
8.	Have performance reports been submitted with drawdowns and quarterly; if not, how will this be remedied? 570.503	<input type="checkbox"/>	<input type="checkbox"/>	A review of quarterly reports demonstrated that they have submitted consistent drawdowns.

III. Anti-Discrimination

		Compliance		Verification
		Yes	No	Source/Comments/Not Applicable
A. EQUAL EMPLOYMENT OPPORTUNITY 570.506(g)(3) & 570.601 & 570.602				

Non-discrimination policy and practice in employment.



Yes, confirmed in pre-application and in employee handbook.

B. NON-DISCRIMINATION IN SERVICES 570.506(g) & 570.601 & 570.602 & 570.607

Are there policies and procedures for non-discrimination in the provision of services?

X



Yes, viewed policy and confirmed in interview.

C. WOMEN & MINORITY BUSINESS ENTERPRISES 200.321 & 570.506(g)(6)

Describe subrecipient action to meet 2 CFR 200.321 that affirmative steps are taken to assure use of small, minority and women owned businesses when possible.

X



A review of the procurement procedures demonstrate that they are making this effort (page 5 of accounting policies and procedures).

	Compliance		Verification
	Yes	No	Source/Comments
D. SECTION 3 OF THE HUD ACT OF 1968 (570.506(g)(5) & 570.607(a))			
1. Has subrecipient attempted to the greatest extent feasible, to award contracts to eligible business concerns located in or owned in substantial part by persons residing in the same area as program activities are being carried out?	<input type="checkbox"/>	<input type="checkbox"/>	N/A for services

IV. Financial Management

FINANCIAL SYSTEMS: (Purpose is to provide control and accountability over funds and assets, identify source and application of federal funds to activities, and to allow for accurate and timely financial reporting.)

	Compliance		Verification Source/Comments
	Yes	No	

A. CASH MANAGEMENT/DRAWDOWN PROCEDURES 200.508(a)(d)

Can the subrecipient support actual data in drawdown reports from documentation on hand? Is the information accurate in drawdown request?



Provided all back up documentation in the draw. All appears to be accurate. Need to understand switch from hourly to salary, changing time. A view of Jeffers and Spears time card shows separation of CDBG time code (April draw).

of vouchers reviewed : Reviewed April 2020 draw and October-December 2020 Draw.

B. PROGRAM INCOME 200.80 & 200.333(e) & 200.400(g) & 570.504

1. If revenue generating activities are being undertaken, are there established procedures to record program income?



N/A

	Compliance		Verification Source/Comments
	Yes	No	
2. Is there a procedure to ensure all program income is recorded in revenue accounts?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3. Is program income on hand used before additional draws are made?	<input type="checkbox"/>	<input type="checkbox"/>	N/A

C. BUDGET CONTROL - Comparison of actual expenditure with budgeted amounts for each grant. Confirm with Final Statement amounts. 200.302(3)(5)

1. Is there a current budget for the project?	<input type="checkbox"/>	<input type="checkbox"/>	Viewed a copy of the budget for the project YWCA Ruth House.
2. Does budget match expenditures?	<input type="checkbox"/>	<input type="checkbox"/>	Information provided matches except budgeted for \$15,745.19 and quarter 3, there is a difference of 15 cents. This was corrected.

D. ACCOUNTING RECORDS - Records that identify the source and application of funds.

1. Does subrecipient identify CDBG expenditures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Copy of account where CDBG expenditures are tracked. Examined and looks good.
2. Does subrecipient identify expenditures by specific grant year?	<input type="checkbox"/>	<input type="checkbox"/>	Yes. Looked at financial records.
3. Does subrecipient record encumbrances when contracts are executed, PO issues, etc.?	<input type="checkbox"/>	<input type="checkbox"/>	Interview
4. Do accounting records include unexpended/unobligated balances (remaining balances)?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
5. Is there a ... chart of accounts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Chart of accounts confirmed this is separately tracked.
cash receipts journal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Viewed files.
cash disbursements journal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Viewed files.
payroll journal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Viewed files, tracked separately.
general ledger?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Posting and trial balances performed on a regular basis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ask

E. INTERNAL CONTROL 200.303

Is there a system of internal control, checks and balances? Describe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Read a copy of the accounting policies and procedures and system of controls is outlined.
Is there an organizational chart?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Controls is outlined according to position. Organizational chart not updated.
Are duties separated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes.

	Compliance		Verification Source/Comments
	Yes	No	
Is there control over access to assets, blank forms, and confidential documents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Interview

F. COST ALLOWABILITY - Review the subrecipient's allocation of cost to verify that its procedures fully comply with 2 CFR 200 Subpart E using the following guidance.

1. Are direct salaries/wages chargeable to more than one grant program or other cost objectives supported by time distribution records?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, a view of the copy of the April timesheets demonstrates that the staff charge to multiple grants.
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Note: If such costs are charged on an indirect basis, the grantee must have prepared an Indirect Cost Allocation Plan in accordance with 2 CFR 200.

2. Any unallowable costs as itemized in 2 CFR 200, including:

a. entertainment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CDBG funds used in full for staff salaries
b. contributions/donations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. fines/penalties	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. general governmental expenditures including salary/expense of CEO	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Have any costs related to political activities been charged to the grant program?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No, a review of financial records.
4. Are costs charged to this grant project not allowable to or included as a cost of any other financed/funded program in either the current or any prior period?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No, a review of financial records.
5. Does a review of the personnel roster of staff being paid from program resources reveal any obvious instances of personnel being paid from but not working on program activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Interviewed, 2 staff are being paid with the grant funds.

G. SOURCE DOCUMENTATION - To support accounting records. 200.302(b)(3)

1. Are expenditures supported by invoices, contracts, POs, time cards, DE3, etc.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Timesheets and payroll records
2. Source documents available?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes, uploaded a copy to ZoomGrants.

H. AUDIT

If federal funding received was over \$300,000, was a single agency audit conducted? Describe.	<input type="checkbox"/>	<input type="checkbox"/>	N/A
If funding received was under \$300,000 was an audit conducted? Describe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Uploaded in Zoomgrants

	Compliance		Verification Source/Comments
	Yes	No	
Were all audit findings resolved?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There were no findings. Audit showed organization has been operating in a negative cash position and needed to take out a \$180,000 line of credit to pay obligations. Management has made changes to address these issues.

I. Review of PROCUREMENT

The monitor should review the subrecipient's procurement policies and procedures to verify compliance with 2 CFR 200.317-200.326 using the following guidance. (Applicable only when the subrecipient expends federal funds for the purchase of supplies, other expendable property, equipment, real property or other services.)

- | | | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|---------------------------------------------------------------------------------------------------|
| 1. Written procurement procedures? 200.318(c)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Uploaded in Zoomgrants |
| 2. What procurement method was used for this project and why was this method selected? N/A | | | |
| 3. What is the procurement process and how is fair competition ensured for- | | | |
| ➤ small purchases <\$25,000 200.320(b) | | | X Documented page 5 of Accounting Policies. |
| ➤ competitive sealed bids/formal ad >\$25,000 200.320(c) | | | |
| ➤ noncompetitive 200.320(f) | | | |
| 4. Was list of debarred or suspended contractors excluded from Federal procurement used to verify contractor/sub eligibility? 200.213 | <input type="checkbox"/> | <input type="checkbox"/> | N/A |
| 5. Are procurement procedures in place to ensure that: | | | |
| a. Purchase orders and contracts are signed by an authorized program official. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A policy is outlined on page 7 of the Accounting Policies and Procedures (uploaded to ZoomGrants) |
| b. Items delivered and paid for are consistent with items contained in the corresponding PO and/or contract. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Page 7 Accounting Policies and Procedures. |
| 6. Does subrecipient have a written code of conduct/conflict of interest policy for those engaged in award / administration of contracts supported by grant funds. 200.112, 200.318(c)(1) | X | <input type="checkbox"/> | Employee Handbook (Conflict of Interest Policy) |
| 7. Can subrecipient document a system of contract administration for determining contractor performance? | <input type="checkbox"/> | <input type="checkbox"/> | N/A |
| 8. If the subrecipient uses prequalified lists, are they current, developed through open solicitation without overly restrictive criteria and include adequate # of qualified sources? | <input type="checkbox"/> | <input type="checkbox"/> | N/A |

VII. Equipment/Real Property Management 200.311, 200.313

	Yes	No	Source/Comments
A. Has subrecipient purchased equipment with CDBG funds? If yes, list: 200.33	<input type="checkbox"/>	<input type="checkbox"/>	N/A
B. Does subrecipient maintain records on equipment/property (valued >\$25,000), which contain all information required? 85.32	<input type="checkbox"/>	<input type="checkbox"/>	N/A
C. Has physical inventory of equipment been taken and the results reconciled with property records within the last 2 years?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
D. If within 5 years of project completion, subrecipient sold equipment/property purchased with CDBG funds, were sale proceeds kept as program income?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E. If subrecipient has disposed of equipment by sale, did the subrecipient request disposition instructions? 200.313(e)	<input type="checkbox"/>	<input type="checkbox"/>	N/A

X. Additional Notes on Project/Agency

There has been a lot of staff turnover at the agency but processes and procedures look good. Covid-19 has made the project goals difficult to implement due to individuals not gathering and difficult maintaining sobriety. Also several Covid-19 safety precautions are in place which make it difficult for individuals to want to adhere to the rules.

XI. Summary

1. **Is subrecipient fulfilling all requirements and meeting regulations?**

Yes, the subrecipient is generally fulfilling all requirements and meeting regulations.

2. **Summary of corrective actions, if any.**

- Corrective actions are to pay attention to quarterly performance reports to make sure all clients are correctly and accurately counted. Non- Ruth House Clients should not be counted.
- A transcription error was made of 15 cents. Ensure procedures are in place to ensure all errors are corrected.

3. **Training needed.**

Sub-recipient staff should re-take training, there are two trainings coming up March 16th 11-12 and March 26th 9-10AM.

4. **Identification of high-risk problems, if any.** No high risk problems identified, sub-recipient is providing an important service in the community for women who find themselves recovering from addiction.

Additional comments by monitor. Covid-19 has had a negative impact on the program. There also has been significant turnover within the organization. Staff is working to get trained on all procedures. The case manager and program manager have significant experience working with this population.

Monitor Signature: Caroline Hegerson Date: 3/15/2021