

**CoC Subrecipient
Management**

How to Stay In Compliance: "What You Should Know"
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First Things First: What Is A Subrecipient?

- A subrecipient is an entity that receives a subgrant from the recipient to carry out the operation of the project See: (24 CFR 578.3)
- Before CoC, the terms "grantee" and "sponsor" were used synonymously
- Grantee is now called the "recipient"
- 'Sponsor' was the entity that provides the housing services required in the grant agreement
- The 'Sponsor' is now known as the "Subrecipient"

Who Can Be A Subrecipient?

- Private non-profit organizations
- States
- Local Governments
- PHAs

SUBRECIPIENT AGREEMENTS



Subrecipient Agreements MUST

- Enter into an agreement to ensure that the subrecipient certifies it will follow all requirements associated with the CoC Program funding
- Maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project
- The address or location of any family violence project assisted will **NOT** be made public except with *written authorization* of the person responsible for the operation of such project

Subrecipient Agreements MUST..

- Establish policies and practices that are consistent with, and **DO NOT** restrict, the exercise rights provided by *Subtitle B of Title VII of the Act* and other laws relating to provision of educational and related services to individuals and families experiencing homelessness
- Where families are involved, they must designate a staff person responsible for ensuring children served are enrolled in school and connected to appropriate services in the community

Subrecipient Agreements **MUST...**

- Ensure its officers, and employees are not debarred or suspended from doing business with the Federal Government.
- Provide information, such as data and reports, as required by HUD.

SUBRECIPIENT MANAGEMENT

- 24 CFR 578.23(C)(2) AND 24 CFR 578.103(a)
- Recipient **MUST** monitor and report the progress of projects to CoC and HUD
- Monitor match for compliance with requirements
- Monitor the subrecipients compliance at least annually!

MANAGING YOUR SUBRECIPIENTS



SUBRECIPIENT MANAGEMENT

APPLIES TO GRANTS AWARDED IN THE FY 2015 and LATER!
2 CFR 200.330

- Must make a case-by-case determination of whether the entity is receiving the funds in role of a subcontractor or contractor
- Evaluate the subrecipient's risk of noncompliance with Federal statutes, regulations, and terms of conditions of the subaward for purposes of determining the appropriate level of monitoring!

SUBRECIPIENT MANAGEMENT

Determining Risk--May Look At:

- Prior experience with HUD/Federal awards?
- Results of previous audits, including (single Audit) Subpart F?
- What were the results of that audit?
- New personnel?
- Previous monitoring?
- Any previous funding from HUD?

SUBRECIPIENT MANAGEMENT

When Reviewing the Subrecipient-Pay Attention To:

- Financial and performance reports
- Timely action on noted deficiencies
- If they met the audit threshold
- Does these results suggest a need to make adjustments to grantee's records
- If non-compliance is determined--any enforcement action taken?

MANY THINGS TO CONSIDER...

- Do Your Research
- Choose partners (Subrecipients) wisely
- Choose Responsibly
- Ensure Accountability
- Document Everything
- Research Further

Who's Ultimately Responsible to HUD?



When Things Go Wrong ☹

- #1- Presents An Opportunity to Improve! ☺
- #2-Keep A Positive Attitude! ☺
- However! Sanctions Can Be Imposed at the Field and/or HQ level
Here's The Basis For Doing So!
- 24 CFR 578.107 --Sanctions
- 24 CFR 578.103-- Recordkeeping
- Your Grant Agreement

BUILD YOUR HOMELESS LIBRARY OF RESOURCES

- 24 CFR Part 578 –Continuum of Care Program
- Guide for Review of CoC Recipient Overall Grant Management in the *CPD Monitoring Handbook 6505.2 REV-7*
- Grant Administration Stages of the Continuum of Care Program Grant (Continuum of Care 2.0)
- HUD Exchange – CoC Program/Resources/Technical Assistance
- Ask your CPD Representative for Technical Assistance

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Thank You For Your Participation!