

# EXHIBIT E

## Monitoring Process



**Monitoring  
Policy and Procedures  
For  
CDBG Programs**

Individual Monitoring Strategy. Whether monitoring is conducted remotely or on-site, the development of an individual, written monitoring strategy is needed to define the scope and focus the monitoring efforts.

The individual monitoring strategy must be documented, timely and concise written documentation is an important tool for management use in assessing planned actions against accomplishments.

Pre-Monitoring Preparation. Broward County reviewers are responsible for being thoroughly familiar with the Federal program to be monitored and knowledgeable of the entity or entities to be monitored. Such comprehension is crucial for making the most of scarce time and resources and effectively determining compliance and accomplishments, especially given program complexities.

- A. The City of Cooper City files must include:
  - Awarded application – project description
  - Grant Contract – sources/uses of funds
  
- B. Activity Eligibility:
  - Program amendment
  - Map revised activity locations
  - Records that demonstrate determinations made as condition for activity eligibility
    - Occupancy and use of facilities
    - Real property acquisition instruments
    - Purchase or rental instruments by public/non-profit/private
    - Professional service agreements
  
- C. National Objective – City file must include:
  - Awarded application – national objective narrative
  - Grant Contract – national objective compliance
  - Amendments – change activity national objective
  
- D. LMA-LMI area basis national objective---
  - Description/map service area boundaries and activity locations
  - Documentation income survey or US Census data matching service area.
  
- E. LMC-LMI limited clientele national objective---
  - Description facility use and what clientele directly benefiting
  - Clientele benefiting, such as: elderly, severely handicapped, homeless
  - Total number of beneficiaries: proposed vs. actual
  - Brief description of architectural barrier; if for removal

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F. LMH-LMI households national objective---

- Owner occupied housing rehab
- Income characteristics of area
- Service area map along with land use characteristics
- Proposed units
- Actual units
- Method for determining household income verifications
- Method and records for applicants and beneficiaries

G. Program Progress

- The status of each activity compared to the projected status in the implementation schedule
- Whether activities are on schedule or substantially behind
- Recorded circumstances or reasons for any delays
- Has the project received/or need an extension

H. Environmental Review

- Project description of all activities
- Written finding
- Appropriate checklist(s)
- Public notice(s)
- RROF/Certification (if applicable)

I. Financial Management

- The City has a Financial Records Trail
  - Invoice and supporting documents
  - Internal controls
  - Approval of payment by board or authorized committee
  - Drawdown processed by the Clerk
  - Invoice matches amount requested for reimbursement
  - Deposit records (date deposited)
  - Payment records (date payment made)

J. Housing Rehabilitation

- Program Guidelines
- Client files with:
  - Income verifications (third party),
  - Closing documents,
  - Lead-based paint notifications,
  - Customer sign offs on work write ups and completed work
  - Non-select files and notification
  - Proper procurement process if hiring contractors directly
  - Contracts with required provisions

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The Department of Housing and Urban Development (HUD) requires monitoring of subrecipient agencies on an annual basis. Monitoring is a system to evaluate whether subrecipients are carrying out their CDBG program(s) in compliance with Department of Housing and Urban Development regulations, the contract terms, and conditions and policies of the City of Allen CDBG Office. Authority: Title I, Housing and Community Development Act of 1974, as amended (42 U.S.C. 5300-5320); sec. 7(d), Department of Housing and Urban Development Act. (42 U.S.C. 3535(d)). Monitoring is an ongoing process of reviewing performance using agency data to make judgments about the performance, and to assist in improving that performance. The contract compliance monitoring performed by the City is different from an annual audit. Monitoring is not an audit of the agency, but rather is focused on the "program" that is CDBG funded. N:\Planning\CDBG\Allen Programs\Public Service\2016-2017 (4/2016) 9 To meet HUD requirements, the City may conduct an on-site monitoring visit, or in certain instances, the City may conduct a "desktop" monitoring visit, whereby the agency is not visited, and their grant is monitored only by review of the information in City files.