Terrebonne Parish Consolidated Government – CDBG-DR

MONITORING PLAN

Revision 1.1 – May 5, 2026: Clarifying the policy.

Contents

The federal requirement found in 2 CFR § 200.328-333 states that the non-Federal entity is responsible for the oversight of the operations of the Federal award-supported activities and that monitoring by the non-Federal entity must cover each program, function or activity. TPCG as the subrecipient of federal CDBG-DR funds may implement programs directly which will be monitored by the Grantee agency, LOCD-DR, or where granting to other subrecipients, is responsible to monitor activities undertaken by a Subrecipient to ensure that federal funds are expended in accordance with all program and cross-cutting federal requirements. In the case of CDBG-DR grants, HUD may issue waivers or make modifications applicable to the grantee/subrecipients and those changes are published in a Federal Register Notice.

TPCG has established this Monitoring Plan for Subrecipients to:

- Gauge the overall progress and effectiveness of the project implementation.
- Serve as a management tool to identify issues that may compromise program integrity, funding, and service delivery for corrective action and resolution.
- Serve as a technical assistance tool whereby the entity identifies areas in which to strengthen program capacity and quality of service delivery.
- Ensure compliance with monitoring requirements prior to closeout[1].

[1] Note that monitoring requirements are separate from audit requirements which are governed by the subrecipient agreement and federal regulations. A single audit is required if subrecipient expends $750,000 or more in Federal awards from all sources during its fiscal year.

HUD requires that all Subrecipient programs be monitored at least once within their implementation and prior to closeout. TPCG is required to maintain files of monitoring events and to report to Grantee of monitoring status for Grantee reporting in the HUD system of quarterly reporting (DRGR). All monitoring findings must be resolved as reflected in program records prior to closeout.

MONITORING OVERVIEW

Terrebonne Parish Consolidated Government has established this Monitoring Plan to:

1. Gauge the overall progress and effectiveness of the program implementation.
2. Serve as a management tool to identify issues that may compromise program integrity, funding, and service delivery for corrective action and resolution.
3. Serve as a technical assistance tool whereby the Grantee identifies areas in which to strengthen program capacity and quality of service delivery.

TPCG Chief Financial Officer (or designee) with the assistance of its grant management contractor will serve as the Monitoring Coordinator for TPCG.

The Monitoring Coordinator is responsible for:

1. Ensuring that a risk assessment is executed for all subrecipients (CDBG-DR Risk Assessment Sample);
2. Setting the Monitoring Schedule that prioritizes reviews based on risk;
3. Ensuring proper documentation and tracking of all monitoring efforts;
4. Notifying the LOCD of severe issues;
5. Engaging the LOCD for necessary technical assistance; and,
6. Ensuring Monitoring occurs as outlined within the Plan.

GRANT MANAGEMENT

TPCG is utilizing a consultant as grant manager of the CDBG-DR projects within the Resilient Communities Infrastructure Program and to assist with projects managed within TPCG and its agencies.

Additionally, TPCG will utilize subrecipients for the implementation of select CDBG-DR projects.

MONITORING CHECKLISTS

The tools described within this section, obtained from the LOCD-DR Disaster Recovery *CDBG-DR Grantee Management Manual*, provide guidance in developing monitoring plans. A sample monitoring plan is included as Exhibit 12-1. The Exhibits included as 12-2 through 12-5 may be tailored for monitoring Subrecipients.

The Core Checklist, (Grantee Manual - Exhibit 12-3 or as updated), will be used to monitor Subrecipients.

Supplemental worksheets will be used in conjunction with Exhibit 12-4 to review the procurement, contracting, labor and financial management compliance. The Contract Administration Checklist, (Grantee Manual - Exhibit 12-5 or as updated), will be used to monitor professional services.

TYPES OF MONITORING

At least one On-Site Review will be conducted of all Subrecipient projects prior to closeout. This review will occur early enough in the project life cycle to allow time for technical assistance and/or the resolution of any corrective actions that may be identified.

A Desk Review may be performed for each subrecipient soon after the binding agreement has been executed to verify initial performance and identify any technical assistance needs. A Desk Review is a limited review of subrecipients and conducted on a risk-based schedule or pre-determined basis (quarterly, annually, twice a year). The goal of a Desk Review is to clarify specific uncertainties that cannot be resolved through subrecipient reports, and to identify any areas where technical assistance may be required. Additionally, Desk Reviews are an integral part of the initial steps for on-site monitoring as they show an insight into the program.

Based on the timing and speed of a project, the Desk Review may be replaced with the on-site review. Additional reviews may be performed to monitor Subrecipients, and/or projects, as necessary.

Vendors/Contractors

During the Desk Review of a subrecipient's vendors/contractors, contract terms and conditions are reviewed by the CDBG-DR Project Manager. Contractors and vendors are required to submit as part of their initial response and review such documents as:

- Copies of Insurance documentations, i.e., liability and professional liability;
- Copies of Bonding documentation;
- Section 3 Plan;
- EEO Utilization Plan; and
- Financial Statement of Condition.

Additionally, the desk review can be used to review reports documenting progress on the overall project as well as more specific reports on program components such as Section 3, Davis-Bacon and EEO which are submitted to the recipient.

Subrecipients

During a desk review of a subrecipient, the CDBG-DR Project Manager can review the status of subrecipient agreements, and other documents or areas including but not limited to the following:

- Subrecipient's Programmatic Policies and Procedures;
- Subrecipient's documentation of procurement transactions;
- Subrecipient's accounting system and documentation of financial transactions;
- Previous invoices submitted to the recipient;
- Procurement policies and procedures;
- Reporting processes;
- Grant/subrecipient agreement terms;
- Reporting and supporting documents such as insurance, certifications and other documentation required by the grantee.

MONITORING PROCESS

TPCG's steps to the monitoring process are listed below and described in the subsequent sections:

1. Execute Risk Assessment
2. Set Monitoring Schedule
3. Provide Monitoring Strategy Letter
4. Conduct Entrance Conference
5. Use Checklists to Monitor
6. Conduct Exit Conference
7. Provide Monitoring Report
8. Provide Technical Assistance as Needed
9. Repeat steps 3 through 8 for each Monitoring Review

1.Execute Risk Assessment

TPCG will conduct an annual risk assessment on all Subrecipient projects to be monitored, to identify those that are most susceptible to risk, fraud, abuse, or mismanagement. It is to be noted that through the competitive process for procuring vendors, many if not all of the risk assessment factors are assessed.

The risk assessment provides critical information to effectively target resources toward subrecipients that pose the greatest risk to the integrity of TPCG's CDBG-DR funding, including identification of the subrecipients to be monitored on-site and remotely, the program areas to be covered, and the depth of the review. The selection process results in identifying subrecipients and activities that represent the greatest vulnerability to fraud, waste, abuse, and mismanagement. This assessment will allow TPCG to minimize potential risk as it administers its allocation. TPCG may adjust the sample outlined below to reflect new criteria or risk factors as identified.

TPCG will make necessary adjustments in preparing the monitoring strategies and revising them based on new information, such as declining or improvement in participant performance, budget constraints, reprogramming of resources or other unanticipated events. Below is an overview of the TPCG monitoring risk assessment.

Figure 2-2 **Terrebonne Parish Consolidated Government CDBG-DR Risk Assessment Sample**

Criteria	Description	High Risk	Medium Risk	Low Risk
Funding	Total Funds allocated to the Project	10	5	2
		Over $1,000,000	$500,000-$1,000,000	$500,000 and below
Complexity	The multiple types of resources and activities associated with the project	10	5	2
		Construction Projects	Demolition only; Loan or Grant Program	Single source funded projects. Buyouts without Construction
Implementat	The use of subrecipients,	10	5	2

ion Method	vendors, or internal staff to carry out the programs/project	Sub-recipient	Vendor implementation	Grantee Staff with vendor Program Management support
Relevant Experience	The experience of grantee/subrecipient/vendor administering CDBG funds.	10	5	2
		No Experience	1-3 years of experience	4+ years of experience
		10	5	2
Compliance History	The grantee or subrecipient's past compliance with federally funded programs.	Past monitoring visits revealed severe deficiencies; or no evidence of any prior monitoring	Evidence of prior monitoring; deficiencies noted, but none severe	Evidence of prior monitoring; no deficiencies noted
Project Timeline	The projected and defined timeline for project completion, per the agreement.	10	5	2
		12-24+ months	6-12 months	Completion in under 6 months

2.Set Monitoring Schedule

At least one On-Site review will be conducted of all subrecipient projects prior to closeout. This review will occur early enough in the project life cycle to allow time for technical assistance and/or the resolution of any corrective actions that may be identified.

a. Projects requiring follow-up activities and/or corrective actions will take precedence over those not requiring such actions.
b. The project risk will also be taken into account when scheduling additional reviews.

3.Provide Monitoring Strategy Letter

TPCG will provide written notification to subrecipients at least thirty (30) calendar days prior to scheduled monitoring reviews. The Monitoring Strategy Letter will discuss the monitoring schedule and identify the areas to be reviewed and the names of the individuals who will be conducting the monitoring. The letter confirms the need for any required services (ex: conference rooms, telephones, and computers).

4. Conduct Entrance Conference

The purpose of the entrance conference is to:

- Explain how the monitoring will be conducted;
- Identify/confirm key entity staff that will assist during the monitoring;
- Set up or confirm meeting or interview times (including any staff or personnel who may be interviewed) and, if applicable, schedule physical inspections; and
- Verify the programs/activities to be reviewed and, if on-site, how access to files and work areas will be granted (some programs files can be sensitive; some work areas can be hazardous).

5.Use Checklists to Monitor

As described within the Monitoring Schedule, the review will be completed by executing the appropriate checklist. Checklist responses will include comments that detail any issues identified. The executed Checklist will be maintained within the Project file.

6.Conduct Exit Conference

After completion of the monitoring review, TPCG conducts an exit conference with the appropriate program officials or staff to discuss preliminary conclusions. In part, this serves to confirm the accuracy and completeness of the information used to form the basis for the monitoring conclusions. All conclusions – positive or negative – must be supportable, defensible, and adequately documented.

7.Draft Monitoring Report

Upon completion of the review, the Monitor will draft a Monitoring Report that identifies the checklist sections used to complete the monitoring review, the results of the review. Generally, the report identifies if there are any types of deficiencies (i.e. Finding, Concern, Observation) and may also highlight areas of merit and any Technical Assistance provided. The Report will explain the basis for the conclusions. The Monitoring Report should also include possible corrective actions and a timeline for resolution of deficiencies. The Monitoring Report will be maintained within the appropriate file. The Monitoring Report will be provided to the Subrecipient.

8.Provide Technical Assistance as Needed

TPCG and its contractor may also periodically conduct Technical Assistance (TA) sessions with subrecipients, contractors/vendors, and/or direct beneficiaries to enable them to understand expectations for program compliance and prepare for monitoring. TPCG may provide technical assistance throughout the life of a grant on numerous topics as it relates to the implementation of CDBG-DR funded projects. Technical Assistance can come in numerous different forms such as:

- Verbal or written advice;
- Formal training; and/or,
- Documentation and guidance.

Technical Assistance can be for new subrecipients/vendors to introduce them to the requirements of CDBG-DR funds. However, Technical Assistance can also include other more technical areas which are tailored to one specific program, subrecipient or vendor or to all entities who have a role in administering the CDBG-DR dollars.

As part of Technical Assistance visits, monitoring and compliance staff will answer any questions and provide guidance on the monitoring and compliance process. TPCG will visit the risk assessment, desk monitoring and onsite monitoring to determine the Technical Assistance need of a program, vendor/contractor, or subrecipient.

Areas commonly covered through Technical Assistance:

- Program Eligibility Criteria
- Procurement
- Financial Management Requirements and timely expenditure of funds
- Labor Requirements (Davis Bacon)
- Section 3 Requirements
- Environmental Review Requirements
- FHEO (LEP, Equal Employment Opportunities, Fair Housing, ADA, Section 504)
- Monitoring and Compliance
- Recordkeeping
- Closeout

9. Follow-up

In the event that issues are identified for corrective action, follow-up actions will be scheduled to address the progress of the resolution. The timing and frequency of the follow-up communication will be determined at the discretion of the Monitor and Monitoring Coordinator and will be based on the severity of the deficiency. All follow-up actions will be documented.

Resources
LOCD-DR Grantee Management Manual: Administrative Manual - Louisiana Division of Administration

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 and Project Worksheets
Exhibit 12-4b	Supplemental Worksheets for Project Checklist
Exhibit 12-5	Contract Administration Form