

**CITY OF MIAMI
DEPARTMENT OF COMMUNITY DEVELOPMENT
MONITORING POLICIES & PROCEDURES**

Section

- 1.1 Policy
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- 1.3 Procedures

1.1 POLICY: It is the policy of the Department of Community Development (“DCD”) to provide internal control mechanisms designed to review performance and to evaluate compliance with Community Development Block Grant (“CDBG”) regulations pursuant to 24 CFR 570, Housing Opportunities for People with AIDS (“HOPWA”) pursuant to 24 CFR 574, Emergency Solutions Grant (“ESG”) pursuant to 24 CFR 91,576,582, and HOME program pursuant 24 CFR 92, Applicability of Uniform Administrative Requirements, which includes compliance with OMB Circular No. A-122, A-133, and/or A-110 whenever applicable.

1.2 RESPONSIBILITY: All employees within the DCD, subrecipients, and/or project sponsors shall comply with this policy unless overruled by an authority higher than the director of the DCD.

1.3 PROCEDURES:

The Monitoring Plan allows the city to make informed judgments about the subrecipients’/project sponsors’ (“Subrecipient”) program effectiveness and efficiency, and their ability to comply with all applicable laws and regulations. In addition, monitoring helps to identify deficiencies, and highlight accomplishments.

1.3.1 The Contract Compliance Analyst (“Analyst”) shall conduct a risk assessment for each of the Subrecipients under their purview utilizing parameters set forth on the city’s Monitoring Plan in order to select which Subrecipients need to be subject to a regular on-site monitoring review.

1.3.2 The Analyst shall contact the Subrecipient via phone to arrange a mutually convenient date for the on-site visit.

1.3.3 The Analyst shall prepare a monitoring calendar. Analysts are advised not to schedule more than two on-site monitoring reviews on any given week. The monitoring calendar shall be reviewed and approved by the division’s supervisor.

1.3.4 The Analyst shall mail the Notification Letter to the Subrecipients to confirm the date of monitoring. This letter shall be accompanied by a monitoring checklist. This letter shall be mailed at least two weeks before the date of the on-site review (Attachment “A”). All appointments shall be reconfirmed via phone or email.

1.3.5 A spreadsheet containing all open Subrecipient contracts shall be available in the department’s shared drive for Analysts to enter up-to-date information as to the dates they will be performing on-site monitoring reviews.

1.3.6 In preparation for the on-site monitoring visit, the Analyst must perform a “Desk-Review” of the file and all relevant data found in-house to confirm compliance. Such data includes, but is not limited to verification of:

- a. the Subrecipient’s approved work program;
- b. the Subrecipient’s approved budget;
- c. the written agreement with the Subrecipient;
- d. quarterly progress reports;
- e. agency’s submission of client certifications (if applicable);
- f. the most recent monitoring report(s);
- g. reimbursement payment – potential timeliness & disallowance issues;
- h. the most recent A-133 audit report
- i. the most recent budget vs. actual spreadsheet
- j. the agency’s policies and procedures manual
- k. the performance vs. value assessment report

1.3.7 Once on-site, the Analyst shall hold an entrance conference with the Subrecipient’s executive director and relevant financial and program staff responsible for the administration and operation of the funded program immediately before the monitoring starts. This meeting will allow for a clear understanding of the purpose, scope, and schedule of the monitoring from the very beginning.

1.3.8 The Analyst shall utilize the monitoring checklist and carefully address all questions on the checklist. In addition, a programmatic review shall also be completed for all funded activities. Answers provided by the Subrecipient shall be verified by reviewing all proper and necessary back-up documentation. The Analyst shall maintain records of the information reviewed during the visit and shall document any conversations with the Subrecipient’s staff. This information shall be utilized for analyzing information and developing conclusions.

1.3.9 Questions from the monitoring checklist being flagged for not meeting a required statute and/or regulation shall result in a finding for non-compliance.

1.3.10 Questions from the monitoring checklist being flagged for not meeting a required, grant agreement clause or city policy shall result in either a finding for non-compliance or a concern depending on the severity of the infraction. The decision as to whether a particular infraction is a finding or a concern is left to be made solely to the discretion of the city.

1.3.11 At the end of your visit, the Analyst shall meet again with key representatives of the Subrecipient’s organization to present the “tentative” conclusions from the monitoring visit in what is referred to as an Exit Conference. This exit conference shall accomplish four objectives:

- a. Present preliminary results of the monitoring visit;
- b. Provide the Subrecipient an opportunity to correct any misconceptions or misunderstandings from the Analyst’s part;
- c. Secure additional information from the Subrecipient’s staff to clarify or support their position;
- d. For a deficiency that the Subrecipient agrees with, to provide an opportunity for the Subrecipient staff to report on the steps they are already taking to correct the matter.

Missing information that is not submitted within 3 business days after the Exit Conference may result in a finding of non-compliance.

1.3.12 Within 14 calendar days of the monitoring visit, the Analyst shall prepare the monitoring report and provide it to the division's supervisor for review.

1.3.13 Within 30 calendar days of the monitoring visit, the Analyst shall send the Subrecipient the monitoring report, which summarizes the outcome of the review. This monitoring report should fully identify any findings and concerns and provide for a deadline of 21 calendar days (from the date of the monitoring report) for the Subrecipient to respond to any non-compliance. The finding must be:

- correctly identified;
- based on applicable law, regulation, or program policy; and
- supported by the facts presented in the monitoring letter.

Make sure to include the deadline in the monitoring report for:

- providing a written response to the findings describing how the Subrecipient shall resolve any finding(s); and
- correcting any deficiency identified.

Concerns do not require a written response. Staff will be ready to provide technical assistance to correct any deficiencies found.

1.3.14 Analyst shall complete the Monitoring Transmittal form (Attachment "B") and provide it to the Aide for the contract log to be updated.

1.3.15 If and when the monitoring report reveals a finding, the Analyst must follow-up with the Subrecipient to ensure that a Corrective Action Plan ("CAP") is submitted prior to the deadline.

1.3.16 If the CAP submitted by the agency is acceptable, the Analyst shall complete the Monitoring Transmittal form and provide it to the Aide for the contract log to be updated. The Analyst shall draft and mail a CAP acceptance letter to the Subrecipient (Attachment "C") <End of Process>

1.3.17 However, If the CAP is not accepted, Analysts shall draft and mail a CAP rejection letter to the Subrecipient (Attachment "D") <End of Process>

Attachment "A"
(SAMPLE)

MONITORING NOTIFICATION LETTER

<DATE>

<SALUTATION> <FIRST_NAME> <LAST_NAME>
<SUBRECIPIENT>
<ADDRESS_LINE1>
Miami, FL <ZIPCODE>

Subject: Notification of On-Site Monitoring Review PY<ENTER YEAR>

Dear <SALUTATION> <LAST_NAME>,

This letter is to confirm that staff from the City of Miami Department of Community Development will be visiting your organization on **<ENTER DAY OF WEEK>**, **<ENTER MONTH> <DAY>**, **<YEAR>** at **<ENTER TIME AS 00:00> <ENTER AM or PM>** to conduct a programmatic and fiscal monitoring review for program year <ENTER YEAR>

The principal objectives of the on-site monitoring review are:

- Review relevant fiscal documents for compliance with federal, state and local regulations and contract requirements.
- Test for compliance with applicable contractual requirements covering earnings, use, and reporting of program income, internal controls, allowable costs, accounting procedures, time and attendance records, work program and client files.

Please refer to the enclosed checklist for on-site monitoring of Subrecipients. *Thoroughly review this checklist and make sure that all the required documentation for the on-site monitoring visit is readily available for review by our Contract Compliance Analyst.*

The Executive Director and appropriate staff should be available to meet with Department of Community Development staff during the meeting.

If you have any questions concerning this visit, please call Makelly Scott, Contract Analyst at 305-416-2144.

Sincerely,

Robert Tazoe, Assistant Director
Department of Community Development

Attachment "B"
(SAMPLE)

MONITORING TRANSMITTAL FORM

Subrecipient _____

Contract Period: _____ Amount: _____

Contract Number: _____ Funding Source: _____ Year: _____

Monitoring #: #1 #2 Monitoring Dates: _____

Findings: _____

Date Report Sent: _____

CAP Due: _____ CAP Received: _____

CAP Status: _____ Reply Sent: _____

Close Out Report Received: YES NO Date Received: _____

Contract Analyst: _____ Date: _____

Reviewed by: _____ Date: _____

Entered into System by: _____ Date: _____

Attachment "C"
(SAMPLE)

CORRECTIVE ACTION PLAN (CAP)
ACCEPTANCE LETTER

<DATE>

<SALUTATION> <FIRST_NAME> <LAST_NAME>
<SUBRECIPIENT>
<ADDRESS_LINE1>
Miami, FL <ZIPCODE>

Ref.: Corrective Action Plan Acceptance

Dear <SALUTATION> <LAST_NAME>,

The purpose of this letter is to confirm that the City of Miami Department of Community Development has accepted your agency's Corrective Action Plan ("CAP") dated <ENTER DATE OF CAP LETTER SUBMITTED BY SUBRECIPIENT>.

Please be advised that city staff will review your agency's implementation and adherence to the abovementioned CAP during our next monitoring visit.

If you have any questions, please contact <ANALYST_FIRST_NAME> <ANALYST_LAST_NAME> , Contract Compliance Analyst, at (305)416-<EXTENSION>, or Mr. Roberto Tazoe, Assistant Director, at (305)416-1984.

Sincerely,

George Mensah, Director
Department of Community Development

c.c.: <ANALYST_FIRST_AND_LAST_NAME>, Contract Compliance Analyst

Attachment "D"
(SAMPLE)

CORRECTIVE ACTION PLAN (CAP)
REJECTION LETTER

<DATE>

<SALUTATION> <FIRST_NAME> <LAST_NAME>
<SUBRECIPIENT>
<ADDRESS_LINE1>
Miami, FL <ZIPCODE>

Ref.: Corrective Action Plan Rejection

Dear <SALUTATION> <LAST_NAME>,

The purpose of this letter is to confirm that the City of Miami Department of Community Development has received your agency's Corrective Action Plan ("CAP") dated <ENTER DATE OF CAP LETTER SUBMITTED BY SUBRECIPIENT>. The following findings still need corrective action for the reasons stated below:

Finding #<ENTER FINDING NUMBER>: <DESCRIBE FINDING>

City Comments: <ENTER COMMENTS>.

A CAP, addressing the non-compliant items must be submitted to the Department of Community Development by <DEADLINE>.

If you have any questions, please contact <ANALYST_FIRST_NAME> <ANALYST_LAST_NAME> , Contract Compliance Analyst, at (305)416-<EXTENSION>, or Mr. Roberto Tazoe, Assistant Director, at (305)416-1984.

Sincerely,

George Mensah, Director
Department of Community Development

c.c.: <ANALYST_FIRST_AND_LAST_NAME>, Contract Compliance Analyst

Enclosures