

CDBG Subrecipient Reporting Training



Introductions

- Project Managers
- Business Operations and Support Services Staff
- Monitoring and Compliance Staff



Agenda

- Program Requirements
- Fiscal Requirements
- Monitoring
- ED Grants Demo
- Q&A



A Word on the Operating Manual...

- Incorporated into subrecipient agreement
- Covers applicable Federal and City of San Diego regulations and requirements
- Represents minimum requirements and controls that must be embodied within subrecipient accounting, internal controls, and financial reporting systems



READ the Operating Manual!!



FY 2026 OPERATING MANUAL

ECONOMIC DEVELOPMENT DEPARTMENT COMMUNITY DEVELOPMENT DIVISION



Monthly Programmatic Reports (pages 31–33)

- Monthly Programmatic Reports (MPRs) due on or before
 15th of each month for prior month
- Provides statistics on individual clients or households served or businesses assisted
 - ✓ Demographic information
 - ✓ Income levels
- Provides narrative updates/explanations and descriptions of accomplishments during reporting period



Track timely progress of project implementation

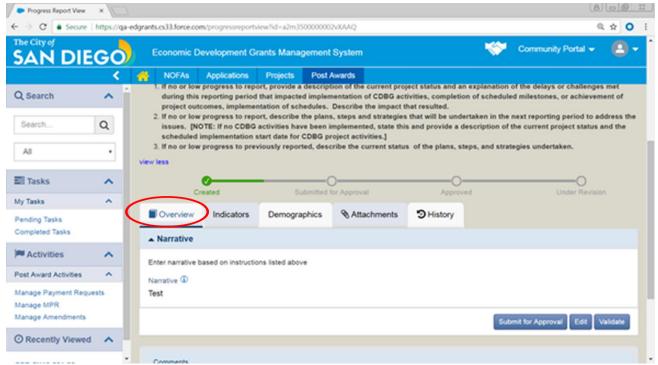
Ensure activities conform with scope of work and expenditures are eligible

Ensure RFRs commensurate with reported activities and accomplishments

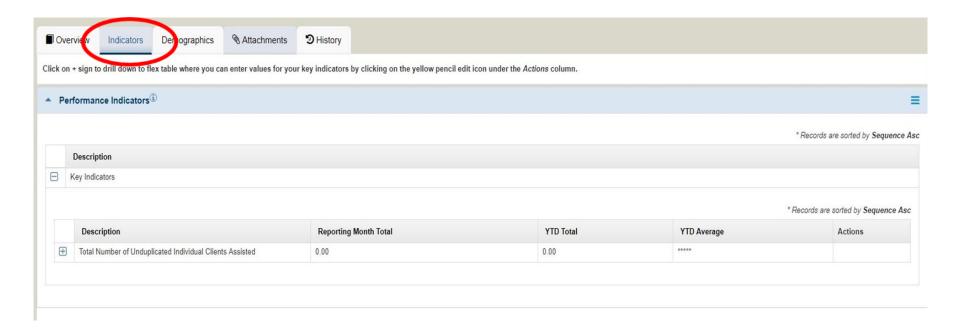
Ensure compliance with all Federal and City of San Diego requirements

Identify any issues for corrective actions

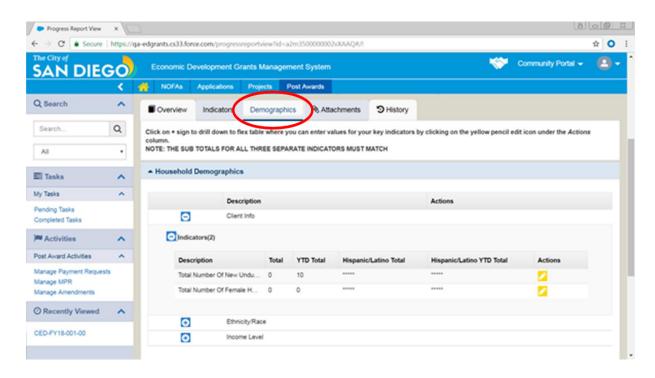




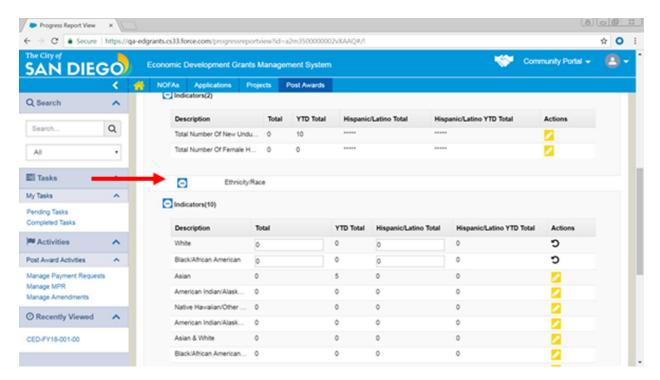




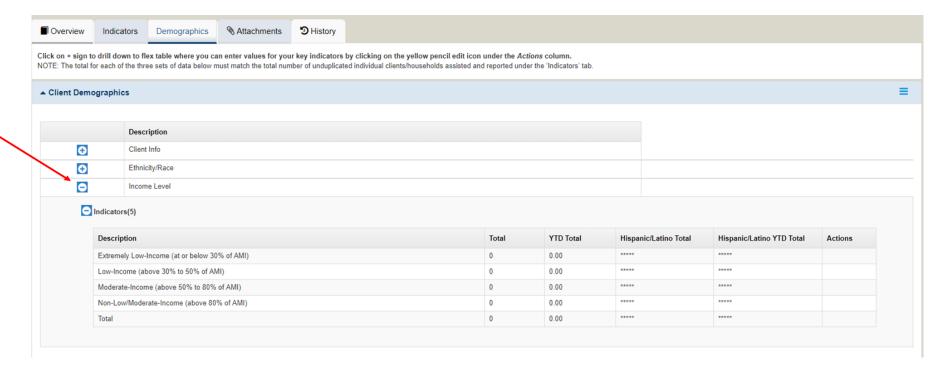




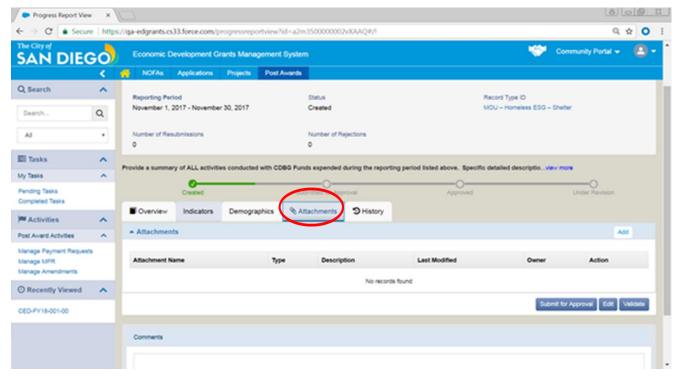














Project Closeout & Tips (page 34)

 Closeout Programmatic Reports to summarize entire project and act as check to MPRs

Tips/Advice

- ✓ Review your records management and documentation procedures to ensure data for reporting is being captured accurately;
- ✓ Use Operating Manual to verify proper records on file and readily accessible; and
- ✓ Keep files and records neat and logically arranged
 - Audits/onsite visits can occur any time



Fiscal Requirements (pages 47-73)

- Request for Reimbursement (RFRs) due on or before 15th of each month for prior month;
- Anticipate RFRs to be processed within 30 days unless submitted late; and
- Provide complete details and supporting documents to avoid processing delays and/or disallowances

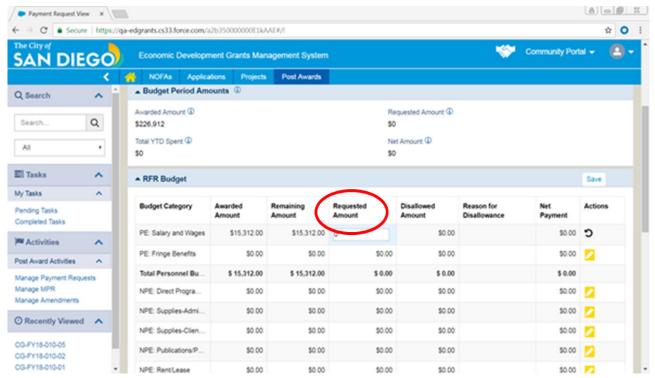


- Expenditures should be based on approved scope of work and budget included in executed CDBG agreement;
- New line items cannot be added;
- Include only expenditures paid within reporting period; and
- Administrative supplies must be purchased before January 2026

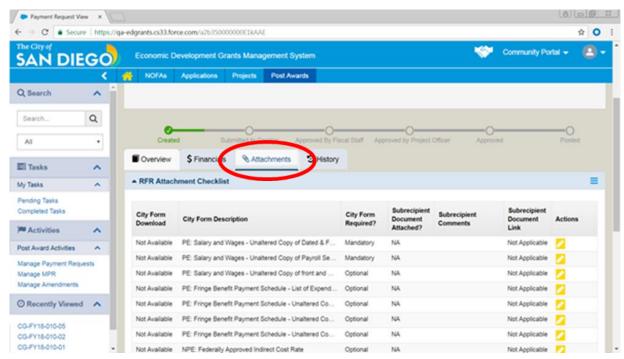


- Only enter amounts into ED Grants to be reimbursed;
- Include "re-submittal" disallowed expenditures from prior reporting period, as applicable; and
- Disallowances from a pervious RFR must be submitted with the next month's RFR



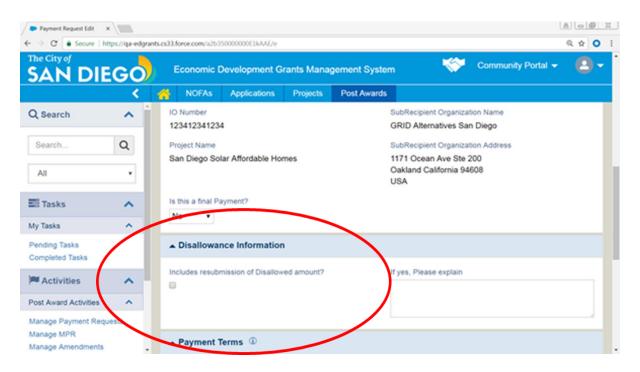






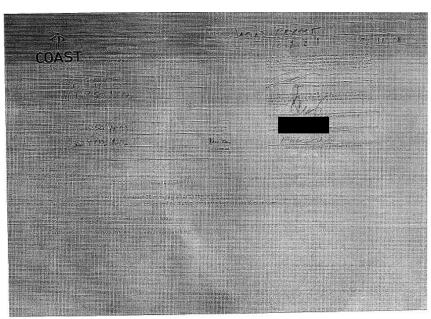


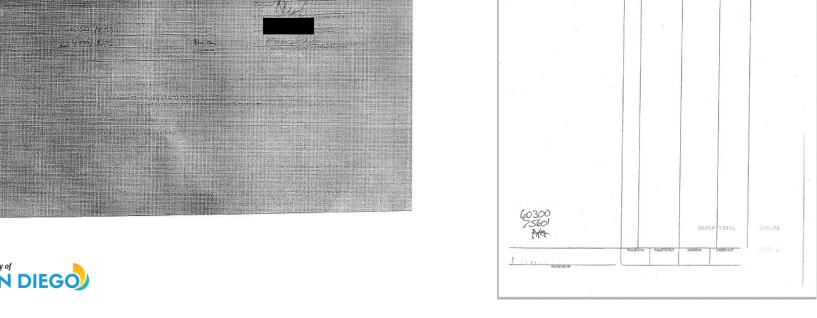
Resubmitting Disallowed Amounts





Unacceptable - Will be Disallowed







Supporting Documentation (pages 49-55)

- Subrecipient must maintain original copies and present them when requested by City or federal staff; and
- All RFRs submitted must have supporting documents
 - ✓ Legible and not altered
 - ✓ Detailed description of what's being claimed
 - ✓ Include all pages of invoices



Supporting Documentation (pages 49-55)

- Submit only relevant supporting documents;
- Missing supporting documents and/or ineligible expenditures will result in disallowances; and
- Proof of payment must be submitted
 - ✓ Bank statements OR
 - Canceled checks



General Fiscal Policies (pages 55-66)

- Increases to overall project budget in CDBG agreement is not allowed;
- Budget line items should not be exceeded, unless a budget amendment is approved; and
- Amounts cannot be moved between categories (personnel to non-personnel) in a budget amendment



Year-End Fiscal Reports (pages 61-63)

- Financial Summary Report;
- Property Records Report (if applicable);
- Audited Current Financial Statements/Single Audit;
- Audit Certificate of Compliance; and
- Year-End Confirmation of Project Expenditures by Funding Source



Monitoring (pages 75-79)

- City staff will conduct desk audits (Monthly Programmatic Reports;
 Requests for Reimbursement) and on-site General Site Visits;
- Construction projects: Certified Payroll Reports/Worker Interviews;
- Program Monitoring Reviews, Fiscal Monitoring Reviews, and Real Property Disposition Monitoring Reviews will be conducted on-site or remotely;
- Notifications of monitoring review results will be issued; required actions related to Concerns or Findings identified will be included in the notification; and
- Concerns or Findings resulting from monitoring reviews may impact performance report card of subrecipients.



Program Monitoring Review

The following areas to be covered include, but may not be limited to:

- Service Delivery Processes;
- Organization Policies and Procedures;
- Records Maintenance Systems;
- Selected Project Participant Files; and
- Original Source Documentation for Monthly Programmatic Reports.



Fiscal Monitoring Review

The following areas to be covered include, but may not be limited to:

- Financial Management;
- Internal Controls;
- Payment Reporting;
- Program Income;
- Records Retention;
- Equipment Management Disposition; and
- Board Financial Oversight.



Real Property Disposition Monitoring Review

Real Property Disposition Monitoring Reviews will also be conducted on construction projects completed in prior fiscal years to determine:

- Whether the ownership status changed;
- Whether rent or client fees were collected resulting from the CDBG improvements completed and what the current rent charges are for multi-family housing projects;
- Whether the use of property or beneficiaries changed;
- Whether CDBG improvements completed are being properly maintained; and
- Whether original source documentation of National Objectives eligibility continue to be properly maintained.



A Word on Timeliness...



- Entitlement jurisdictions are required to use their CDBG funds in a timely manner;
- HUD timeliness standard = no more than 1.5 times the entitlement amount; and
- Unspent subrecipient funds can place the entire CDBG program into noncompliance



City Strategy

- Select organizations with capacity;
- Contractual timeliness requirements; and
- Sanctioning untimely subrecipients

What Can You Do?

- Identify the cause of any backlog;
- Identify actions to take and expected results; and
- Develop a milestone schedule and expenditure projection



Performance Indicators (up to -2.5 points)

Assessment Area	Indicators	Standards	
Fiscal Performance	 Balance of Award at Closeout (\$) Total Disallowances at Closeout (\$) Number of Disallowances Processed (#) 	 Award Balance ≥ 10% (-0.50 point) Total Disallowances ≥ 10% (-0.25 point) Disallowance Frequency ≥ 50% (-0.25 point) 	
Programmatic Performance	 Number of Clients Served OR Number of Projects Completed 	 51-79% of target met (-0.50 point) ≤ 50% of target met (-1.0 point) 	
Leveraged Funding	Stated RFP Funding vs Actual Closeout Funding	• Discrepancy > 25% (-0.5 point)	Currently Under Review



Leveraged Funding

d. Budget lists all other funding sources secured for project, submits documentation for each source listed, and percent of funds leveraged (calculated by: other secured funding/total project costs) is:

0% – 5% (0 points) 41% – 60% (3 points) 6% – 20% (1 points) 61% – 80% (4 points) 21% – 40% (2 points) 81% – 100% (5 points) (CDD score)

5



ED Grants

- All MPRs, RFRs, and Budget Amendments to be submitted via ED Grants;
- Only one MPR, RFR, or Budget Amendment may be "pending approval" at a time;
- ED Grants to track timely submissions, disallowances, and revisions for performance evaluation purposes; and
- All supporting documents to be uploaded to ED Grants

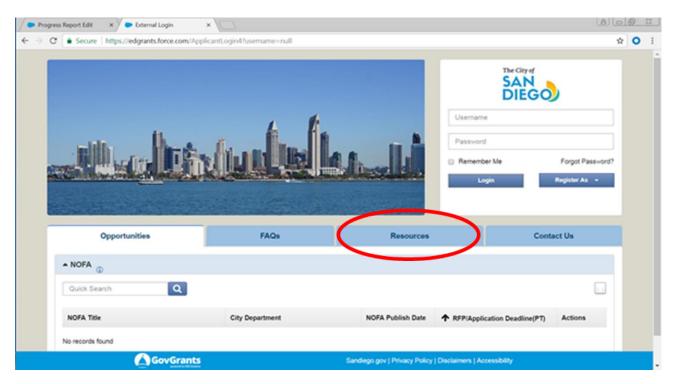


Resources

- Operating Manual
- <u>Playing by the Rules</u> Handbook by HUD
- CPD Income Eligibility Calculator
- 2 CFR 200.302 through 200.303
- CDD Technical Assistance
- Mandatory Fair Housing Training
- CDBG@sandiego.gov



ED Grants "Resources" Tab







Questions?