



Office of the Comptroller

June 22, 2001

W. Martin Morics, C.P.A.
Comptroller

John M. Egan, C.P.A.
Deputy Comptroller

Michael J. Daun
Special Deputy Comptroller

Anita W. Paretti, C.P.A.
Special Deputy Comptroller

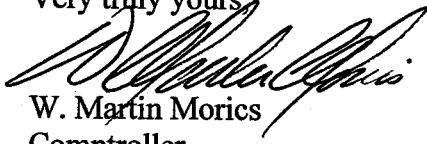
Mr. Ronald D. Leonhardt, City Clerk
City Clerk's Office
200 E. Wells Street, Room 205
Milwaukee, WI 53202

Dear Mr. Leonhardt:

The attached report, titled "Audit of the City of Milwaukee Community Block Grant Agency Program Monitoring" is being submitted to you for introduction to Common Council.

If you have any questions about this matter, please contact me or Mr. Michael Daun, at 286 - 2304.

Very truly yours



W. Martin Morics
Comptroller



**Audit of the Community Block
Grant Agency Program Monitoring
in the City of Milwaukee**

W. MARTIN MORICS
City Comptroller
City of Milwaukee, Wisconsin

June, 2001

Table of Contents

Transmittal Letter	1
Audit Scope and Objectives	3
General Background, Organization and Fiscal Impact	4
Audit Questions, Conclusions and Recommendations	5
1. What are the Strengths & Weaknesses of the CDBG Program Monitoring Process? What Impact Does this Process Have on the CDBG Program? .5	
Recommendations 1 through 4	7
2. To What Extent is the Required Performance/Outcome Reporting Meaningful in terms of Grantee Program?	7
Recommendations 5 through 7	8
3. To what extent is Current Performance Reporting Accurate, Complete and Timely?	9
Recommendation 8.....	9
Recommendation 9.....	10
4. Are the Grantees in Compliance with CBGA Policies, Procedures and Guidelines for Pay-for-Performance?.....	10
Department Response	11
Appendices.....	15

June, 2001

To the Honorable
the Common Council
City of Milwaukee

Dear Council Members:

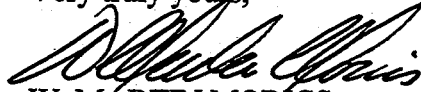
The attached report presents the results of our Audit of the City of Milwaukee Community Block Grant Agency Program Monitoring. The audit objectives were to evaluate the Community Development Block Grant Program monitoring process and its impact on the Block Grant Program; determine the extent that required performance/outcome reporting is meaningful in terms of Grantee Program Objectives, determine the accuracy, completeness and timeliness of Grantee Reporting; and evaluate the Grantee compliance with Community Block Grant Agency established "Pay-for-Performance" guidelines, rules and procedures. The scope was limited to the Program monitoring process. The audit focused on required grantee activity performance reporting and Community Block Grant Agency program monitoring activities including its review and use of grantee activity performance information during the years 1999 and 2000.

The audit determined that the Community Block Grant Agency has established a strong, detailed grantee program performance monitoring process. The core of this process is the monthly link between actual grantee performance and reimbursement. The impact of this process on annual grant funding decisions is lessened due to other more subjective factors, some of which are not documented when Agency funding recommendation are made. Since the implementation of Neighborhood Strategic Planning Areas (NSP's) the workload of the monitors has increased and, along with a lack of upward mobility, may have contributed to a large turnover of monitors in the last four years. The audit also determined that performance/outcome reporting is meaningful, that is, directly related to annual grantee program objectives. Evaluation of grantee mid and long-term goals has not been performed. The audit also determined that current performance reporting is accurate, complete and timely with only minor exception. Lastly, the audit concluded that grantees are in compliance with Community Block Grant Agency rules related to Pay-for -Performance funding.

The audit has made recommendations to further enhance and improve the program performance monitoring and reporting process. These recommendations include providing the Community Development Committee with quarterly narrative interpretations of grantee performance scores and clearly documenting all recommendations for grant award when the highest scoring proposal within a program category is not selected. Also, the audit recommends reporting the mid to long term impact of major grantees activity on the affected neighborhoods. Some of these recommendations build upon and support directions already taken or recommended by the Community Block Grant Agency. Audit findings and recommendations are more fully discussed in the Audit Questions, Conclusions and Recommendations section of the report. The Departmental Response follows thereafter.

Appreciation is expressed for the full cooperation extended to the auditors by the Community Block Grant Agency and the participating grantee agencies.

Very truly yours,



W. MARTIN MORICS
Comptroller

AUDIT SCOPE AND OBJECTIVES

Audit Scope and Objectives

This is an audit of the program monitoring process for the City of Milwaukee Community Block Grant Agency (CBGA). The scope of this audit is limited to the Program monitoring process. The audit focused on required grantee activity performance reporting and CBGA program monitoring activities including its review and use of grantee activity performance information during the years 1999 and 2000.

The audit does not extend to the program needs assessment or the funding allocation process except to examine how Program monitoring affects such allocations. The audit also did not examine financial compliance monitoring performed by the Office of the Comptroller.

The objectives of this audit are:

1. To Evaluate the Community Development Block Grant Program (the Program) Monitoring Process & Its Impact on the Block Grant Program,
2. To Determine the Extent that Required Performance/Outcome Reporting is Meaningful in terms of Grantee Program Objectives,
3. To Determine the Accuracy, Completeness and Timeliness of Grantee Performance/Outcome reporting, and
4. To evaluate Grantee compliance with the Community Development Block Grant Agency established "Pay-for-Performance" guidelines, rules and procedures.

**GENERAL BACKGROUND,
ORGANIZATION AND FISCAL IMPACT**

General Background, Organization and Fiscal Impact

The Community Development Block Grant is a Federal grant program, which provides the City of Milwaukee with grant funds totaling approximately \$22 to \$23 million annually. This Program – including the Federal HOME (housing, \$8 million) and HOPWA (\$405,000) & Emergency Grant Programs (\$783,000) - is administered by the Community Development Block Grant Agency, a Division within the City's Department of Administration. The Agency totals 13 full time staff and an annual budget of \$750,000. Some staff members are included in the City Service system while others are exempt.

For the Fiscal year 2000, the Program allocated \$22 million to about 85-90 grantee agencies including seven different City departments. In total, about 185-190 programs receive grant funds (for approximately 500 separate activities).

The process used by the City to allocate the above grant funds has developed and evolved over the 27 year history of the Program, and with it CDBG Program Monitoring has also evolved. Two years ago, the City developed a pilot "Pay-for-Performance" system for funding home buyer counseling and economic development activities. Under Pay-for-Performance, a grantee is paid through reimbursement based solely on how many home mortgages are closed and how many jobs are created/persons are placed. This contrasts with the majority of Program allocations granted which are funded on a reimbursable basis. Program grants subject to Pay-for-Performance standards total about \$ 3 million annually.

Final Program funding decisions are made through Common Council resolution. The Community Development Committee, a standing committee of the Council, recommends Program funding levels for each grantee to the Council.

The CBGA consists of a Director, an Associate Director, Compliance Manager and a staff of six grant monitors and four additional support personnel.

- Grant monitors report to the Compliance Manager who reports to the Director.
- Grant monitors perform two basic functions, a). Oversee the program activities of various grant recipients (grantees), and b). Provide technical assistance to grantees.
- Grant monitors work as a team, each having a primary functional specialty such as housing or economic development, and are cross-trained in a secondary specialty.

**AUDIT QUESTIONS, CONCLUSIONS
AND RECOMMENDATIONS**

Audit Questions, Conclusions and Recommendations

1. What are the Strengths & Weaknesses of the CDBG Program Monitoring Process? What Impact Does this Process Have on the CDBG Program?

Conclusions

The Program Monitoring Process (the Process) is a detailed and well-documented process including extensive quantitative reporting of grantee activity See Appendices I & II. Because compliance is tied to continued funding, the vast majority of grantees adhere to required performance reporting.

The basis of the Process and a major strength is a monthly reporting of Program activity by each grantee in a Grantee Cost and Performance Report. In examining these data, program monitors must determine that the level of activity reported in these documents is sufficient prior to approving a monthly reimbursement or cash advance.

Monitors also maintain extensive contact with grantees throughout the grant year, particularly those exhibiting performance problems/issues. As confirmed by grantee interviews, CBGA monitors are generally in contact with their assigned agencies on at least a monthly basis (some biweekly). Grant Monitors do maintain formal Project Control Reports containing substantive issues/problems with grantees. These reports are reviewed by the Grant Compliance Manager for follow-up purposes, and maintained in CBGA's correspondence files. But often, there was little record of these contacts found in the CBGA's correspondence files.

Monitors will perform a Risk-Analysis every April. Each monitor will then conduct grantee site visits during May and June for those agencies whose risk of non-performance merits such visits or are on CBGA's priority list for a site visit. The goal is for each monitor to perform 10-20 formal site visits and 10-20 informal site visits per funding cycle.

The audit observed that in 2000, the Economic Development (Job training, job placement) monitor developed an important client name data base which is now used to compare names and other vital data to prevent double billing, e.g., grant paying twice for serving the same client. There are now additional data bases used by each monitor to assist in the collection of data and the control over reimbursement for unduplicated services.

Further, a competitive Request-for-Proposal process has been established as the basis for grant award. This competitive process provides the basis for program performance commitments and is a key strength. Current and potential grantees submit proposals for funding, generally for a two year period. Grantee proposal evaluation includes the prior two years performance. The evaluation also gives some preference to agencies with prior grant experience.

The CBGA makes recommendations for the CDBG program, HOME, Energy Shelter Grant and HOPWA. The CBGA annually recommends funding of that year's CDBG allocation to specific grantee applicants in an "Activity & Funding Recommendations Report". Proposal scores are developed for each grant applicant and documented in the "2001 RFP Scores by Organization" Report. Brief comment on selected grantee proposals is also included. For some grants the CBGA makes no recommendation. Both Reports are submitted to the Community Development Committee to assist in annual grant funding decisions. This is another strength.

Based on an audit sample of grant applicant scores versus CBGA grant recommendations, it is clear that factors other than past program performance and proposal scores also have a significant impact on CBGA funding recommendations. These other factors include grant applicant service capacity, a general preference toward staying with a current service provider and Mayor and individual aldermanic preferences made known to the CBGA during its analysis. In fact, the audit sample showed that 40 percent of grant awards sampled were recommended for award to grant applicants other than the highest scoring applicant. The CBGA considers all of the above factors when it prepares its recommendations for consideration by the Community Development Committee. Please see the CBGA response letter.

Once the CBGA's recommendations reach the Council's Community Development Committee, this Committee accepts the vast majority (97 percent) of the recommendations. This high percentage of Committee acceptance is not surprising given the aldermanic input during the CBGA's proposal evaluation process. When a Committee action does differ from the CBGA recommendation, there is typically no Committee documentation supporting the Committee's rationale for such decisions.

With the continued enhancement of the monitoring process, the initiation of NSP driven needs analysis, and the expansion in the number of Program grantees, the CBGA Program monitors have seen their workload increase dramatically over the past 3-4 years. See Appendix III. Further, the monitor positions have limited upward mobility. These factors may be leading to monitor turnover. For the six program monitor positions, four transfer/promotions and one resignation have occurred in the last three years. Seven of the ten grantees interviewed indicated that the changeover in monitoring staff created some response related problems for the grantee.

The CBGA has responded by hiring experienced community program personnel, developing a focused training effort, and teaming up new monitors with more experienced monitors for grantee site visits. In spite of these steps, given the heavy workload on current monitors, this may be a growing issue for the CBGA in the future.

Recommendations

To enhance the strength of the CBGA monitoring and reporting, the audit makes the following recommendations:

1. The CBGA should add narrative interpretation of grantee performance scores in the Activity & Funding Recommendations Report. Such narrative should include key grant applicant strengths and weaknesses and rationale for each funding recommendation referred to the Community Development Committee.
 2. When the CBGA recommends funding for an applicant whose proposal does not possess the highest score among its competitors, a rationale for the selection including any subjective factors should be clearly documented by the CBGA in its report to the Community Development Committee.
 3. CBGA monitors and grantees should document all field, phone and other contacts with each other, clearly describing the substance and required follow-up resulting from these contacts. Further, the CBGA's grantee correspondence file should contain an agency contact log. This log could indicate the date, time, person contacted and the subject of the contact. Such a log could be helpful to new monitors, giving the new monitors a sense of what has transpired in the past with particular agencies. If there is a rule or regulation interpretation by the monitor, a file memo should be prepared referenced to the grant file to which the interpretation applies. The CBGA has indicated its agreement with this recommendation.
 4. Consider extending the funding cycle for selected additional grants to two or three years. This would help existing monitors handle the required workload. With this same intent the CBGA is also proposing to extend funding without an RFP process to those grantees with a proven performance record, a stable program and no newly proposed services. The Audit supports this proposal as another way to help monitor staff to handle the current workload.
- 2. To What Extent is the Required Performance/Outcome Reporting Meaningful in terms of Grantee Program Objectives?**

Conclusions

An examination of both grantee and CBGA performance reports reveal that the data provided is directly related to grantee objectives contained in their respective grant proposals and contracts with the City. A grant-by-grant listing of applicants and the CBGA recommended funding are contained in the "Activity & Funding Recommendations Report" provided to the Community Development Committee. This Report is supported by a "2001 RFP Scores by Organization" Report containing a numerical score for each proposal received. Brief comment on selected grantee proposals is also provided in this Report.

Annually CBGA also reports actual numeric outcomes against performance goals on an agency by agency basis in the annual report entitled Consolidated Annual Performance and Evaluation Report required by HUD to confirm City compliance with Federal CDBG requirements. This Report also informs the Federal government about the performance of the Milwaukee Program and, given a sound performance record, helps justify continued funding.

The Agency requires that grantee applicants provide both mid-term and long-term objectives in addition to the annual activity/outcome objectives. This is apparently intended to focus the grantee on the continuing impact of its activities on the affected neighborhood/community. However, the Audit could find no activity or monitor documentation to measure the extent that the desired mid and long-term impact had in fact occurred.

Recommendations

Based on the above observations and conclusions the audit makes the following recommendations to enhance the reporting and disclosure of activities:

5. The monitors' reports of their individual site visit results, or a summary of site visit results, should be transmitted to the Community Development Committee. While copies of site visit letters are sent to the affected alderman when problems arise, such information would be beneficial to the entire Committee by giving the Committee early warning of grantee problems and what corrective actions are needed.
6. The CBGA should consider complementing its annual numerical evaluations with quarterly narrative interpretations of grantee performance reported to the Community Development Committee. We understand that the CBGA has previously suggested periodic performance review meetings with the Community Development Committee, presenting grantee performance by grant category. The Audit strongly supports such meetings with the Committee as an excellent method of keeping the Committee and the public informed about the use of Block Grant and related Federal funds.
7. CBGA monitoring should seek to determine the impact that Block grant program is having in the CDBG NSPs over time. Toward this end, the CBGA should require that major grantees conduct targeted longitudinal or other cost-benefit evaluations to determine the mid to long-term impact of their activities on the affected neighborhoods. (For example, for a job training program, a grantee study would determine how many of those who completed training over the past three years are still employed, other assessments could explore reduction in youth crime, changes in housing condition, etc.).

Given this info, the CBGA's annual report to the Community Development Committee should assess how the Block grant activities are advancing the established

goals of the NSPs and in what program activities is the Block Grant most/least effective. Subsequent to completion of audit fieldwork, the CBGA asserted that for the coming year funding was being requested to assist CBGA in developing mid to long-term measurement reporting.

3. To what extent is Current Performance Reporting Accurate, Complete and Timely?

Conclusions

With minor exception, the grantees reviewed in this Audit generally had adequate documentation to support their outcome reporting. The audit reviewed ten agencies selected at random to provide a cross-section of the grantee services within the City. These agencies accounted for 72 grants in 1999 and 65 grants in 2000, with seven pay for performance grants in each year. Generally speaking, these grantees' performance reporting were accurate, complete and submitted on time.

Based on an audit sample, documentation supporting actual grantee performance achieved was generally adequate. Very few exceptions were noted. Of our sample of 137 grants over two years, only one agency with two of 13 grants had inadequate support documentation.

At the beginning of this Audit in October 2000, monthly performance reporting by City of Milwaukee departments who were also grantees was generally unavailable. Instead, quarterly reports were required. This appears inconsistent with other grantees. However, during the course of this audit, City grant entities such as NIDC are now required to file monthly activity reports. Auditors were also told that other City departments will soon be required to do so. The audit also noted that two grantees were almost always late in submitting their cost reports and activity reports.

As shown in Appendix II, the CBGA invests a substantial portion of staff time producing reports for HUD and the Community Development Committee and reviewing reports received from grantees. Many of these reporting requirements and the accompanying data collection are HUD mandated to justify, among other things, continued funding.

Recommendations

Based on the audit conclusions above, the audit makes the following recommendations:

8. Unless there is a compelling reason to the contrary, all City Departments be required to report their grant activities in the same manner as the other grantees.

9. The Agency should carefully examine current performance reporting to determine if there are any opportunities to consolidate or eliminate any current data collection or reporting requirements.

4. **Are the Grantees in Compliance with CBGA Policies, Procedures and Guidelines for Pay-for-Performance Funding?**

Conclusions

The audit determined that grantees are in compliance with CBGA policies, procedures and guidelines for pay for performance funding. Grantee documentation examined during this audit followed pay for performance policies, procedures and guidelines with only minor exceptions. Without adequate documentation grantees do not get paid. Support documentation for pay for performance documentation was adequate for all grantees sampled in the period covered by the Audit.

Recommendations

None.

DEPARTMENT RESPONSE

COMPTROLLER

'01 JUN 15 PM 2: 21



Department of Administration
Community Block Grant Administration

John O. Norquist
Mayor

David R. Rierner
Director

Juanita Hawkins
Administration—Block Grant Director

June 15, 2001

W. Martin Morics, Comptroller
Office of the Comptroller, Room 404
200 E. Wells Street
Milwaukee, WI 53202

Dear Mr. Morics:

Re: Audit of Community Block Grant Program Monitoring in the City of
Milwaukee

ATTN: Michael J. Daun

The office of Community Block Grant Administration (CBGA) appreciates the opportunity to respond to the draft document entitled, "Audit of Community Block Grant Agency Program Monitoring in the City of Milwaukee."

Attached, please find CBGA's response, citing specific page and section number we are responding to.

If you have any questions about this matter, please contact me or Hettie White, at 286-8146.

Sincerely,

Juanita Hawkins
Director

Attachment

Community Block Grant Administration
Response to the Comptroller's Audit of Community Block Grant Program Monitoring
in the City of Milwaukee

Page 5, para 3 - Project Contacts

Grant Monitors do maintain formal Project Contact Reports containing substantive issues/problems with Grantees. These Reports are reviewed by the Grant Compliance Manager for follow up purposes and maintained in CBGA's correspondence files. We will expand the Report to include substantive telephone and other contacts, to be filed monthly in the Grantee's Project file.

Page 6, para 1 - Activity and Funding Recommendations Report

CBGA makes funding recommendations for the following grants: Community Development Block Grant, HOME, Emergency Shelter Grant, and Housing Opportunities for Persons with Aids.

Page 6, para 2 - Factors having an impact on funding recommendations

CBGA's analysis of 230 applicants who responded to Request for Proposals revealed that of 79 agencies recommended for funding through the RFP process, 71% were chosen based on highest scores. In addition, 10% were selected because they were the only applicant and 11% because they were the current providers. In 6% of these cases, providers were chosen either because of mayoral recommendation (1 new project) or aldermanic recommendation (6 existing projects). CBGA also notes that the Funding Allocation Plan indicated that current providers would receive priority funding consideration.

Page 6, para 4 - Response related problems for grantees

Although the audit did not provide specific detail or occurrences, this typically occurs when there is a turnover in Grantee staff and CBGA is called upon to provide "training" to new grantee employees on CBGA reporting requirements. This technical assistance can be time consuming depending on the organization and the person, and may actually involve the grant monitor completing necessary paperwork.

CBGA also points out that Grant Monitors must often work with City Departments (City Attorney, Comptroller) Aldermen, or outside entities (HUD) to resolve grantee issues.

As the Comptroller states in its audit letter to the Common Council, "the CBGA office has established a strong, detailed grantee program performance monitoring process." As part of this process, CBGA has in place HUD requirements, various City administrative rules and procedures as well as legal requirements governing response time to grantees and response time required of grantees. They come with remedies for noncompliance as well as a detailed complaint process and are spelled out in the contractual document between the City and the Grantee. From a grantee perspective, only one organization has used the complaint process with HUD and the Community Development Committee. HUD and the Committee upheld CBGA's recommendation.

Page 2
W. Martin Morics
June 15, 2001

Page 7, number 1 - Adding narrative interpretation in the Activity and Funding Recommendations Report

Short, concise talking points accompany grantee performance scores along with comment on each application during the CBGA Director's report to the Community Development Committee. CBGA receives three times as many applications as there is funding available. The application review period is condensed to a few short weeks, making it virtually impossible to provide a detail narrative analysis of each application.

Page 7, number 2 - Documenting selection of applicants

The proposal evaluation criteria is detailed in the Funding Allocation Plan. Before implementation, the Funding Plan is reviewed by the public and approved by the Community Development Committee and the Common Council.

Page 8, para 2 - Documenting mid and long-term impact

CBGA always acknowledged when NSP and outcome reporting became a funding priority in 1998 that a statistical analysis be conducted on the long-term impact of funded activities on the affected neighborhoods. CBGA supports funding an independent consultant to perform this activity.

When site visits are conducted, grant monitors report on the status of short and midterm outcomes and if grantees are on track with meeting these outcomes. Grant monitors review documentation related to short term outcomes that usually involve the actual activity; mid-term outcomes primarily relate to the methods used to reach the long term.

It should also be acknowledged that many external factors outside the control of CDBG funding, has a bearing on whether the long-term impact on the affected neighborhood/community has occurred.

Page 8, number 5 and 6 - Providing reports to the CD Committee

CBGA currently provides the Community Development Committee a quarterly Accomplishment Report on agency activities and believes other meetings should involve only substantive issues, to be determined by CBGA.

Page 8, number 7 - Documenting mid and long-term impact

CBGA always acknowledged when NSP and outcome reporting became a funding priority in 1998 that a statistical analysis be conducted on the long-term impact of funded activities on the affected neighborhoods. CBGA supports funding an independent consultant to perform this activity.

Page 3
W. Martin Morics
June 15, 2001

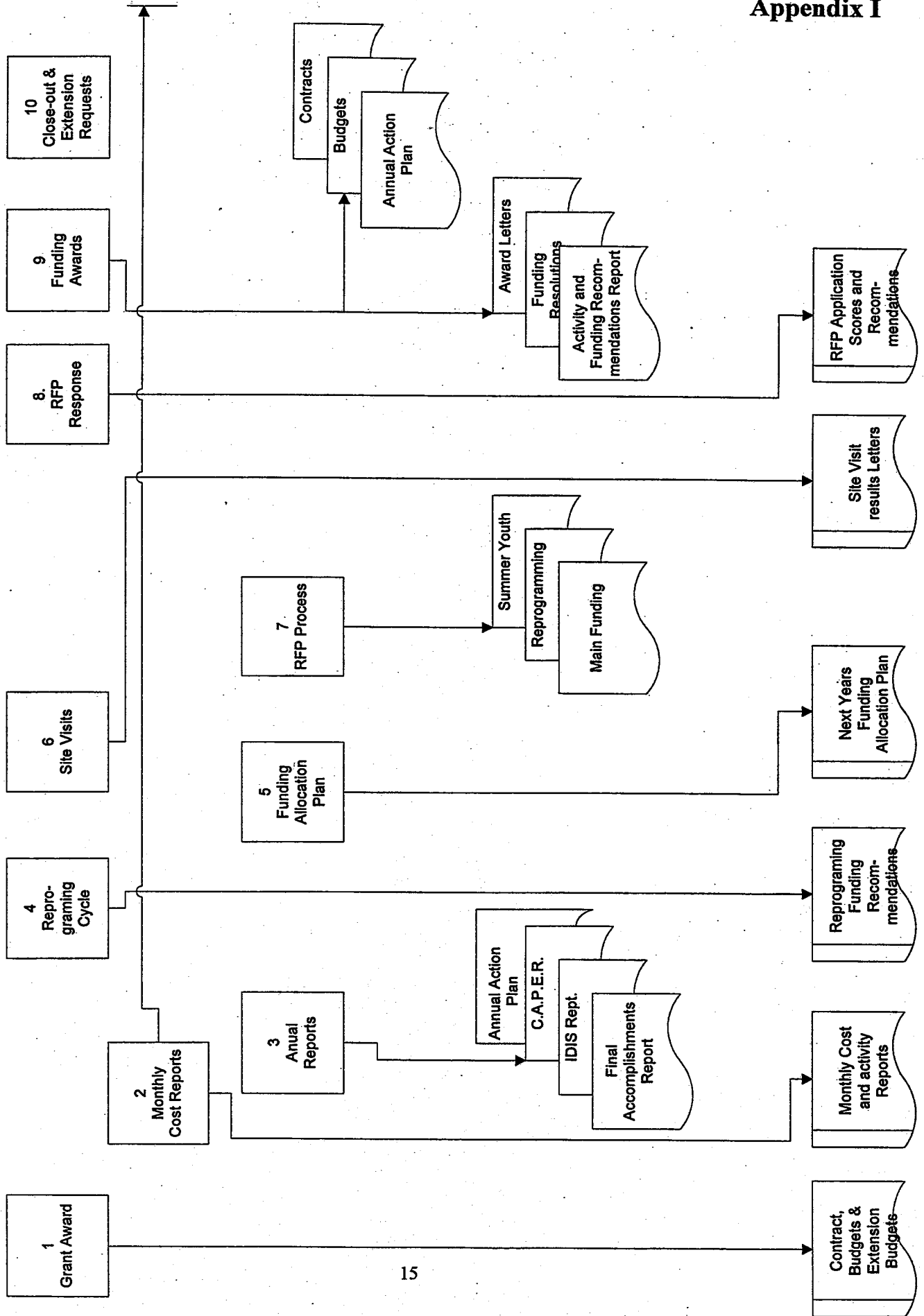
When site visits are conducted, grant monitors report on the status of short and midterm outcomes and if grantees are on track with meeting these outcomes. Grant monitors review documentation related to short term outcomes that usually involve the actual activity; mid-term outcomes primarily relate to the methods used to reach the long term.

It should also be acknowledged that many external factors outside the control of CDBG funding, have a bearing on whether the long-term impact on the affected neighborhood/community has occurred.

APPENDICES

CBGA Document and Grant Monitoring Process

Jan. Feb. Mar. Apr. May Jun Jul Aug Sep Oct Nov Dec Jan



Appendix I

Appendix II

City of Milwaukee Audit of CDBG Program Monitoring Index of Reports Prepared by CBGA

CDBG Annual Action Plan (December-January) This document is a HUD requirement. It outlines the basic strategy for the coming budget year, and identifies by NSP where CDBG funding is going. This report includes application for Federal Assistance supported by documentation of funding needs. The Community Development Committee and the Common Council must approve this report prior to submission to HUD. This document is prepared with the assistance and input of the block grant monitors and is amended during the year as programs are added.

Consolidated Annual Performance Evaluation Report (March) This document reports the activities of the CDBG programs for the prior year and is a HUD requirement. It is prepared with the assistance and input of block grant monitors. The report consists of a Citywide assessment of the various parts of the block grant program, narratives related to the various funds that are administered by the CBGA and support reports for various activities. Also are included copies of the IDIS report and the final accomplishment report (see below). The Community Development Committee and the Common Council must approve this Report prior to submission to HUD.

Integrated Disbursement and Information System Report (IDIS) (March). This report is a HUD required report and summarizes activities on a grant by grant basis of all grant recipients. This report is prepared with the direct assistance of grant monitors. The report narratives are used to amplify the accomplishments of each grant recipient.

Accomplishment Reports (Quarterly, with final due in March). These reports summarize the accomplishments of each recipient agency, comparing outcome of program activities against performance goals. The comment sections of the reports are used to amplify funding activities without evaluation of the agency being reported. The source of the accomplishments reported are summaries of monthly outcome reports submitted with cost reports and reviewed by the monitors.

Funding Allocation Plan – Identifies areas of community need and general funding available by program category. This document also describes the schedule and steps which make up the Request for Proposal process. This document is approved by the Community Development Committee and the Common Council.

Request for Proposals for Community Development Funding (September-November). This document may be required by the City. The document identifies areas of need and general funding available. Prospective grantees bid via performance outcome for each grant available. Grants are currently awarded in two year cycles. The document is prepared by the CBGA monitoring staff, who will also grade responses when received.

RFP Application Scores by Organization Report (October-November). This report provided to the Community Development Committee summarizes and grades every respondent to the Request for Proposals. The report is prepared with assistance of the block grant monitors, and includes an evaluation grade for each agency bidding on the grant, whether that agency is a new agency or an agency that had the grant in previous years. This report is submitted with the Activity and Funding Recommendation Report (See below).

Activity and Funding Recommendations Report, (November). This report consists of funding recommendations by organization, area (NSP and citywide), and program category. The report is submitted to the Community Development Committee for approval. Activity reports detailing accomplishments of currently funded grantees who have applied for continued funding are also attached. The report is submitted to the Community Development Committee for approval, and is subject to change by the Committee. The report as approved by the committee is transmitted to the full Common Council for approval. Activity Reports are without evaluation comment.

Community Development Committee Funding Resolutions. The staff of the CBGA prepares these documents to detail the funding awards for Common Council consideration. Support documentation includes some evaluation narrative on each funding recipient recommendation.

Monthly Cost Reports – Invoices of “Pay for Performance” activities, (Monthly) These documents are prepared by the subrecipients who also must submit support documentation as required by HUD and CBGA. These documents are review by monitors, who follow up on problems with documentation and lack of activity. These documents are the underlying information used to prepare all activity reports mentioned above.

Grant Database (up-dated monthly). These databases include economic development, home buyer counseling, and others such as housing, youth and shelter activities as maintained by the monitor staff. These databases were established to track categories of activities and monitor progress. With economic development, this also includes a tracking mechanism to help insure that payment based on total jobs created or placed is not duplicated. The purpose of this report is to provide statistical data to HUD, and also provided control over the program by identifying any duplicate persons entered into the system.

Completed Risk Analysis Questionnaire (completed annually). This questionnaire is used to identify the level of risk associated with CDBG grantees and is primarily used as a preventative tool. In doing so, this completed questionnaire helps grant monitors prioritize the timing of formal site visits. Once completed these questionnaires are used to select whether an agency will receive a site visit or not.

Site Review Results Letter, (August-September). These letters summarize the results of the site visits and include any concerns or compliance findings and recommendations for correction of compliance issues. Agencies are required to respond to these letters within a given timeline when concerns have been cited. Letters are kept a part of the permanent file for each affected agency.

HOPWA, EC/EZ and Weed and Seed Annual Reports. These reports are required by the various funding sources. Prior to submission to the funding sources they are presented to the Community Development Committee for approval. These reports require much of the same input from the monitors that the other CBGA annual reports require.

Monitor Workload

CBGA Monitors are responsible to perform the following:

- Act as Lead Monitor for 15 to 20 Agencies. This requires co-ordination of other monitor's activities, understanding all of those particular agencies on-going grants, and reviewing all submissions of those particular agencies.
- Monitor (compliance) grants for a particular type of grant (specialty – Economic Development, Housing, etc.) on a monthly basis. This could involve upwards of 40 agencies. This monitoring includes reviewing activity reports and required supporting documentation from each agency (with up at least 3 to 5 separate activities).
- Provide Technical Assistance to each grantee. This requires continuous contact with each agency (at least monthly, but most cases weekly contact).
- Prepare annual risk analyses for each assigned agency (as lead). Further, either as lead, or in co-ordination with the particular lead monitor, perform 10-20 site visits as required in the performance of their responsibilities.
- Assist in the preparation of the annual Request for Proposal for new grants.
- Review annually and grade responses/proposal for new grants, for the grant specialty, which the monitor is responsible. Also, the monitor provides input to CBGA administration for the continuation awards to grantees of existing programs.
- Assist in the preparation of all annual reports to the Community Development Committee and to HUD.
- Similar activities occur within the Home, HOPWA and Emergency Shelter Grant programs.
- Monitors are allowed to take vacations only on a time available basis.