

PROGRAM PROGRESS

I. PURPOSE

- This chapter provides guidance for assessing the progress of CDBG, HOME, ESG and other federally funded programs administered through DHCD. Review of Compliance /Monitoring activities of Chapters 2 and 3 should be accomplished in determining Program Progress.

II. REVIEW OBJECTIVES

Monitoring program on-going progress requires an assessment of whether the sub-recipient is carrying out its program in a timely manner and according to the timeframe identified in the Scope of Services. This assessment will be an important element in determining whether the sub-recipient has a continuing capacity to carry out the program in a timely manner. In addition, monitoring of program progress provides an opportunity for the reviewer to:

- Become familiar with the sub-recipient's program
- Review the sub-recipient's management system
- Verify the Progress Report
- Provide technical assistance; and
- Coordinate reviews of other program areas

III. PRE-VISIT PREPARATION

- Sources of Information. In order to assess sub-recipient progress accurately, it is important to review in-house information concerning performance. Review of this material will assist the Project Manager to become familiar with the program, select projects to monitor, identify known performance problems and pinpoint slow moving projects. At a minimum, the Project Manager should review:

- 1) Sub-recipient-provided information on progress contained in the progress report; and appropriate correspondence with the sub-recipient relating to those reviews, including corrective actions the sub-recipient indicated it had taken to improve performance.
- 2) The dates of requests for wage determinations and requests for release of funds.
- 3) HUD-generated information on progress.
- 4) Additional information which may be available from previous monitoring reports, audit reports, complaints, and any additional sources of information concerning other factors which affect implementation (contract conditions, sub-recipient schedules, management, etc.); and

- 5) The sub-recipient's description of activities and the scope of services contained in the approved application and any amendments.

Selection of Activities for Review

- 1) The Project Manager should select a representative sample of activities which appear from the Progress Report to be slow-moving or delayed as determined by the following factors:
 - (a) Approved two or more years prior to the current grant year and not completed
 - (b) Initially approved in the prior grant year and not yet free from environmental condition

IV. MONITORING VISIT

- Performance measurements, program progress, reporting and monitoring cross reference intertwine with each other.
- It may be useful to complete the selection of activities to be monitored for progress at the beginning of the monitoring visit. One approach to monitoring progress is to use the progress report as the basis for discussion with the sub-recipient to determine the current status of each activity that appears behind schedule, to determine whether any additional activities should be monitored and to verify the information provided by the sub-recipient in the progress report.
- Having selected a group of activities for on-site monitoring, the Project Manager should review records the sub-recipient maintains which indicate progress of those individual activities as well as the total program. Such records may include timetables and schedules, internal progress reports books of account covering obligations, expenditures and unobligated balances and contracts. The Project Manager should also interview staff involved in program implementation to determine the current status of the activity, any past or anticipated problems, the apparent causes for any delay, and what actions if any the sub-recipient has undertaken or proposes to undertake to improve progress.
- During the visit, the Project Manager should focus on certain key indicators of progress such as:
 - 1) Clearance of contract conditions, including environmental
 - 2) Completion of project design or plans and specifications
 - 3) Procurement of contracts and obligations of funds; and
 - 4) Expenditure and drawdown of funds
- Generally to carryout a program of activities in a timely manner, a sub-recipient should have a system which monitors the progress of activities, identifies problems and undertakes corrective actions. Therefore, in conjunction with the monitoring review of

progress, the reviewer should also determine whether the sub-recipient has such a management system in place.

- The Project Manager should also visit several activities to determine if on-site progress is consistent with the sub-recipient's records.
- The progress review may be accomplished concurrently with monitoring of other program areas as appropriate, particularly eligibility and primary objectives. If the Project Manager chooses to follow activities from the planning stage through applicable major milestones, it is possible to review concurrently such program areas as environment and compliance with other applicable requirements.

V. ASSESSMENT OF INDIVIDUAL ACTIVITIES

- From the review of records, interviews with person's involved in the program, and site inspections, the Project Manager should determine whether the individual activities reviewed have been carried out in a timely manner. Where activities have experienced delays, the Project Manager should assess:
 - The reason for the delay
 - The extent to which the factors causing the delay are beyond the control of the sub-recipient or the extent to which the original schedule was unrealistic; and
 - Whether the cause is unique to the project or systematic; and
 - What corrective action if any the sub-recipient is undertaking
- Attachment A (Pages 4-5, 4-6 and 4-7) is a suggested guideform for conducting this assessment. The Project Manager should document conclusions concerning both activities which are progressing on schedule and those which lag behind. Attachment B (Pages 4-7 and 4-9) are County Reporting Requirements that are incorporated into Sub-recipient Agreements.

VI. ASSESSMENT OF PROGRESS FOR THE PROGRAM AS A WHOLE

- The Project Manager should analyze the on-site monitoring results and pertinent in-house data to detect possible trends and existing or potential problems. The assessment should cover the following areas:
 - 1) The results of the review of individual activities
 - 2) The actions the sub-recipient is undertaking to improve performance
 - 3) Total obligations and expenditures for the program compared to the total grant amount; and

- 4) The current performance standard for progress as presented in program regulations

VII. CONCLUSIONS

The reviewer should reach conclusions about:

- 1) The adequacy of the sub-recipient's management system
- 2) Whether the program was carried out in accordance with the approved scope of services; and
- 3) The accuracy of the data in the progress report

If the recommended guides for on-site monitoring of progress are not used, the Project Manager should otherwise document the conclusions and provide supporting detail.

Attachment A

**SUGGESTED GUIDE FOR ASSESSING PROGRESS IN COMPLETING
INDIVIDUAL ACTIVITIES**

Sub-recipient _____ Project Manager _____

Index Code _____ Date _____

Activity Name, Funding year(s), Funding Source(s) _____

Questions preceded by an asterisk (⁴) are not related to statutory or regulatory requirements, but are only included to assist the reviewer in understanding the sub-recipient's program more fully and/or to identify issues that if not properly addressed could result in deficient performance. Therefore, negative conclusions to asterisked questions may result in a "concern" being raised but not a "finding".

- *1. How does the sub-recipient manage and control timely implementation of this activity, e.g., schedules, project manager, etc? Is this method effective?

- *2. When did the activity start? How long has it taken to get to the current stage?

- *3. To what stage has the activity progressed, e.g., design of plans and specifications, etc.?

*4. What preparations have been made for the next phase?

*5. Is the activity on schedule? If not, how far behind schedule is it? What is the new completion date?

*6. If this activity is not on schedule, at what phase, e.g. bidding, did the delay occur? What was the cause and has any attempt been made to remedy this problem?

*7. For physical development activities, if the activity is under construction, what percentage has been completed?

*8. For social service activities, is the activity operating at the planned level (number of employees, number of people served)?

*9. What is the total budget for this activity?

Multi-year \$ _____

Current \$ _____

*10. What is the total funding obligated \$_____ ; and expended \$_____

*11. From a site inspection, is the amount of work completed consistent with the amount of funds expended? If no, explain.

*12 Was the information available from the progress report consistent with the data reviewed on site? Yes_____ No_____

*13. What current impediments or obstacles to prompt completion have you identified and what recommendations to improve progress do you suggest?

MIAMI-DADE SUB-RECIPIENT PROGRESS REPORTS

- a. The Sub-recipient shall submit a status report using the form attached in the agency's contract with Miami-Dade County as Attachment C, "Progress Report," as it may be revised by DHCD, which shall describe the progress made by the Sub-recipient in achieving each of the objectives and action steps identified in Attachment A, "Scope of Services."

The Sub-recipient shall ensure that DHCD receives each report in triplicate (or as indicated) no later than April 10, July 10, October 10 and January 10 of each calendar year.

The Sub-recipient shall submit to DHCD a cumulative account of its activities under this agreement by completing the following portions of the Progress Report Form:

Section I - Status of Contracted Activities

The Sub-recipient must report specific information regarding the status of the contracted activities, including accomplishments and/or delays encountered during the implementation of the project and an unduplicated count of clients served during the reporting period (if applicable) for each federally defined ethnic category. Sub-recipients engaged in construction and/or housing rehabilitation projects shall report on the progress of their activities including the number of housing units completed and occupied by low-moderate and low income residents. The Sub-recipient shall also report demographic information on each head of household. Each goal and corresponding objective(s), as indicated in the approved Scope of Services, must be addressed as part of this report.

Section II - Fiscal Information

The Sub-recipient must report expenditure information based on approved budgeted line items to reflect all costs incurred during the reporting period. In addition, the Sub-recipient shall report on Program Income Usage for each contracted activity.

Section III - Contractor/Subcontractor Activity Report

Contractor/Subcontractor Activity Report (First and Third Quarter Progress Report) - The Sub-recipient shall report to DHCD the number of business activities involving minority vendors, including subcontractors performing work under the Agreement. The Contractor/Subcontractor Activity Report Section in Attachment C, and when applicable Section 3 in the same Attachment shall be completed semi-annually by the Sub-recipient and submitted to DHCD no later than April 10 and October 10 of each calendar year.

Section IV - Neighborhood Employment Opportunities:

Neighborhood Employment Opportunities Report (First and Third Quarter Progress Report) - The Sub-recipient shall report to DHCD the number of target and service area residents who have received employment opportunities from federally financed and assisted projects and activities.

The Neighborhood Employment Opportunities Report shall be submitted using the Progress Report Form attached hereto as a Section in Attachment C of the contract, as it may be revised. This section of the form shall be completed semi-annually by the Sub-recipient and submitted to DHCD no later than April 10 and October 10 of each calendar year.

The Sub-recipient shall submit to the County, in a timely manner, any other information deemed necessary by the County, and its presentation shall comply with the format specified at the time of the request. Failure to submit the Progress Reports or other information in a manner satisfactory to the County by the due date shall render the Sub-recipient in noncompliance with this contract. The County may require the Sub-recipient to forfeit its claim to payment requests or the County may invoke the termination provision in this Contract in accordance with the terms of the agreement.

- b. Unspecified Site(s) Objective - If the Sub-recipient has not yet identified a location to carry out any of the activities described in Attachment A of the contract, the Sub-recipient shall submit, in triplicate, Progress Reports, using the form attached hereto as part of Attachment C of the contract, on a monthly basis until such time as the Sub-recipient complies with the provisions contained within the contract. Copies of the above described Progress Report shall be received by DHCD no later than the tenth (10th) business day of each month and shall address the progress undertaken by the Sub-recipient during the previous month. This Progress Report shall not be required if the Sub-recipient is submitting the Progress Reports required by the contract.
 1. Annual Report (Fourth Quarter Progress Report)-The Sub-recipient shall submit a cumulative status report (hereinafter referred to as "Annual Report") using the "Progress Report" specified in the contract, which shall describe the progress made by the Sub-recipient in achieving each of the objectives identified in the scope of services during the previous year. The "Annual Report" must cover the CDBG fiscal year of January through December 31 and shall be received by DHCD no later than January 10 following the expiration of the fiscal year.
 2. Environmental Review - The Sub-recipient immediately upon locating or determining a site for each of the "Unspecified Site" activities to be carried out pursuant to the contract, shall submit information detailing the location of each site for which a Site Environmental Conditions Statement, will be prepared as described in the contract as set forth below. The Environmental Review is to be prepared on information contained in Attachment D of the contract, "Information for Environmental Review Form." The

Sub-recipient shall obtain a written Environmental Approval Letter from DHCD prior to expending CDBG funds. Failure to comply with this requirement shall result in the revocation of the agency's agreement with Miami-Dade County.

3. Audit Report - The Sub-recipient shall submit to DHCD an annual audit report in triplicate as required by the contract between the Agency and Miami-Dade County.
4. Personnel Policies and Administrative Procedures - The Sub-recipient shall submit detailed documents describing the Sub-recipient's internal corporate or organizational structure, property management and procurement policies and procedures, personnel management, accounting policies and procedures, etc. Such information shall be submitted to DHCD within 30 days of the execution of the contract with Miami-Dade County.
5. Inventory Report - The Sub-recipient shall report annually all nonexpendable personal and real property purchased with federal funds from this and previous agreements with the County as specified in the agency's contract with Miami-Dade County.
6. Affirmative Action Plan - The Sub-recipient shall report to DHCD information relative to the equality of employment opportunities whenever so requested by DHCD.