



# **BOULDER COUNTY COLLABORATIVE**

## **MONITORING PLAN**

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### Risk Analysis

- A. At the beginning of each calendar year (January to December), a monitoring Risk Analysis is completed for all recipients of Community Development Block Grant – Disaster Recovery (CDBG-DR) funding. The Risk Analysis identifies risk criteria and establishes a base line level of risk for each recipient. The Risk Analysis is used to determine which what level of monitoring review is appropriate for each recipient, the frequency of visits, and if additional reporting and monitoring requirements are necessary. Each criterion is weighted based on the level of risk indicated in each item. Each recipient’s overall risk level is based on the total points received on each criterion.
- a. **10 Points – High risk criteria**
    - i. Recipients that receive \$4,000,000.00 or more
    - ii. Recipients that have four (4) or more activities
    - iii. Recipients that have zero (0) to two (2) years of experience administering Community Development Block Grant programs
    - iv. Recipients that have two or more key staff turnovers
    - v. Recipients that have 4 or more findings on their Single Audit
    - vi. Recipients that have Housing or Economic Development activities
    - vii.
  - b. **5 Points – Medium risk criteria**
    - i. Recipients that receive \$1,000,000 to \$4,000,000
    - ii. Recipients that have two (2) to three (3) activities
    - iii. Recipients that have three (3) to five (5) years of experience administering Community Development Block Grant programs
    - iv. Recipients that have 1 key staff turnover
    - v. Recipients that have 2-3 findings on their Single Audit
    - vi. Recipients that undertake Infrastructure activities
  - c. **0 points – 1 Point – Low risk criteria**
    - i. Recipients that receive less than up to \$1,000,000.00
    - ii. Recipients that have one (1) activity
    - iii. Recipients that have five (5) or more years of experience administering Community Development Block Grant programs
    - iv. Recipients with no staff turnover
    - v. Recipients that have 1 finding or no findings on their Single Audit
    - vi. Recipients that do not have Housing or Economic Development activities
    - vii. Recipients that do not have Infrastructure activities
- B. All recipients are assigned levels of monitoring based on the outcome of the above Risk Analysis criteria. A preliminary schedule of on-site monitoring visits is established at the beginning of the calendar year. The level of monitoring can be adjusted during the contract period for reasons such as non-compliance with contract provisions, failure to meet performance objectives, failure to submit

accurate and timely reports, findings identified from on-site monitoring, staff turnover in key positions of the organization, and other identified changes that increase the risk of administering grant funds. Non-compliance by the recipients can result in suspension of funds, termination of the contract, and request for repayment of all funds provided under the contract. The following is a description of programmatic and activity/project-level monitoring requirements based on risk level.

a. **Programmatic Review**

All grant recipients, regardless of risk category assigned, shall undergo programmatic review a minimum of every 12 months. If another entity in the State has completed a CDBG-DR programmatic review within 12 months, then an additional programmatic review is not required, but the BCC will follow up and report out on any open findings and concerns from the prior monitoring.

b. **Activity/Project Review**

As a result of the Salesforce platform the BCC has chosen to use as a data management system, BCC staff conducts daily, weekly, and monthly reviews of project files and data as they are uploaded and submitted into Salesforce. National objective, eligibility, procurement, duplication of benefit, environmental assessment, labor standards, rehab elements, relocation, etc. are reviewed and approved by BCC staff before reimbursement is approved on an individual, project, and/or program basis. BCC staff performs many multi-tiered reviews throughout the general conduct of a project or program before a more formal monitoring occurs. Because this level of monitoring is already in place throughout the life-cycle of every project, the monitoring plan at the activity/project level is as follows:

1. **Low Risk:** Grant recipients who are placed in the low risk category on the Risk Analysis are required to have at least one (1) desk monitoring or on-site monitoring of at least one activity/project before final reimbursement.
2. **Medium Risk:** Grant recipients who are placed in the medium risk category on the Risk Analysis are required to have a desk monitoring or on-site monitoring for at least 50% of the projects awarded. Monitoring will commence once key components of the project level have occurred to ensure a comprehensive review.
3. **High Risk:** Grant recipients who are placed in the high risk category on the Risk Analysis are required to have a desk monitoring or an on-site monitoring of 100% of the activities/projects awarded for infrastructure, and at least 10% of housing files per program. Monitoring will commence once key components of the project have occurred to ensure a comprehensive review, unless an extended timeframe of open projects or extraordinary circumstances warrant additional monitoring.

A) Prior to notifying organizations of an on-site monitoring, monitoring staff reads the grant agreements, notes any late and/or incorrect submissions of invoices and performance reports, and reviews any previous monitoring letters, regardless of the funding source. The purpose of this review is to determine the scope of the monitoring visit prior to sending a letter notifying the organization of the visit.

B) One month prior to conducting an on-site monitoring visit, a letter is sent to the organization. The letter confirms the dates and scope of the monitoring and indicates the information and/or documentation that will be reviewed. A copy of this letter is uploaded into Salesforce.

C) An entrance conference is held with the appropriate staff at the beginning of the visit to discuss the scope of the monitoring visit and to provide a preliminary itinerary.

D) Grant/State of Colorado program checklists are utilized to ensure that all elements of the review are completed. Documentation is maintained of all records reviewed, the scope of the review, records obtained, and the status of the review. The checklist and all supporting documentation are uploaded into Salesforce.

E) Expenditure verification and contract compliance are also monitored. At least one month of receipts/cancelled checks are traced through the general ledger to ensure that the organization is accurately tracking expenditures of grant funds. Client/project files are examined randomly to ensure that the documentation of client/project eligibility are maintained.

F) An exit conference is held at the end of the visit to present preliminary results of the monitoring visit to the relevant staff members. This conference provides an opportunity for the organization to ask and answer questions and to provide and secure additional information. It also provides an opportunity to discuss a preliminary corrective action plan to clear any deficiencies discovered during the on-site monitoring visit.

G) Within 45 days of the monitoring visit, staff issues a monitoring letter noting any findings, concerns, and any resolutions discovered during the review. The letter is addressed to the appropriate staff member/s. The letter is prepared and signed by the Boulder County Collaborative lead agency (Longmont) A copy of the letter is uploaded into Salesforce.

H) Organizations are given 30 days to respond to monitoring letters. The response must address each concern and/or finding with appropriate action. Should the response not capture all concerns and/or findings, a second monitoring letter is prepared and mailed to the appropriate staff. A copy of the letter is uploaded into Salesforce.

I) The organization letter of response will be reviewed by monitoring staff to ensure that the response adequately addresses all deficiencies. Within 30 days of receipt of the organization's response, a letter and/or email is sent accepting the organization's response or detailing the deficiencies that remain unresolved. A new deadline for the corrective action will be established for unresolved issues. This letter and/or email will be addressed to the appropriate staff. This letter and/or email is prepared and signed by the BCC lead agency (Longmont). A copy of the letter and/or email is uploaded into Salesforce.

J) The organization is given 30 days to clear a finding. If, at the end of 30 days the finding still remains unresolved, the BCC lead agency (Longmont) will notify the organization. A letter and/or email will be addressed to the appropriate staff identifying the open findings and concerns. The letter and/or email is prepared by the BCC lead agency (Longmont). A copy of the letter and/or email is uploaded into Salesforce.

K) If, after 60 days the finding continues to be unresolved, the BCC lead agency (Longmont) issues a letter to the organization detailing the unresolved findings and/or concerns. The letter informs them that all

payments and/or future contracts will be held until the findings and/or concerns are resolved. A copy of the letter is uploaded into Salesforce.

L) The original monitoring report and all final documents will be uploaded into the State's Monitoring and TA Tracker.

### **Desk Monitoring**

Monitorings may be conducted based on a file review also known as a desk monitoring. Desk monitorings may be used for small projects that were quick and relatively easy to complete or larger projects where the grant recipient and BCC staff have worked hand-in-hand on compliance through the life of the project. Desk monitorings will primarily be used to review only project specific monitoring items – that project's procurement, environmental assessment, contracting, DOB, etc. It is not intended to be a programmatic review to look at the community's Financial Management practices or a review/monitoring of the "overarching" review elements such as Fair Housing.

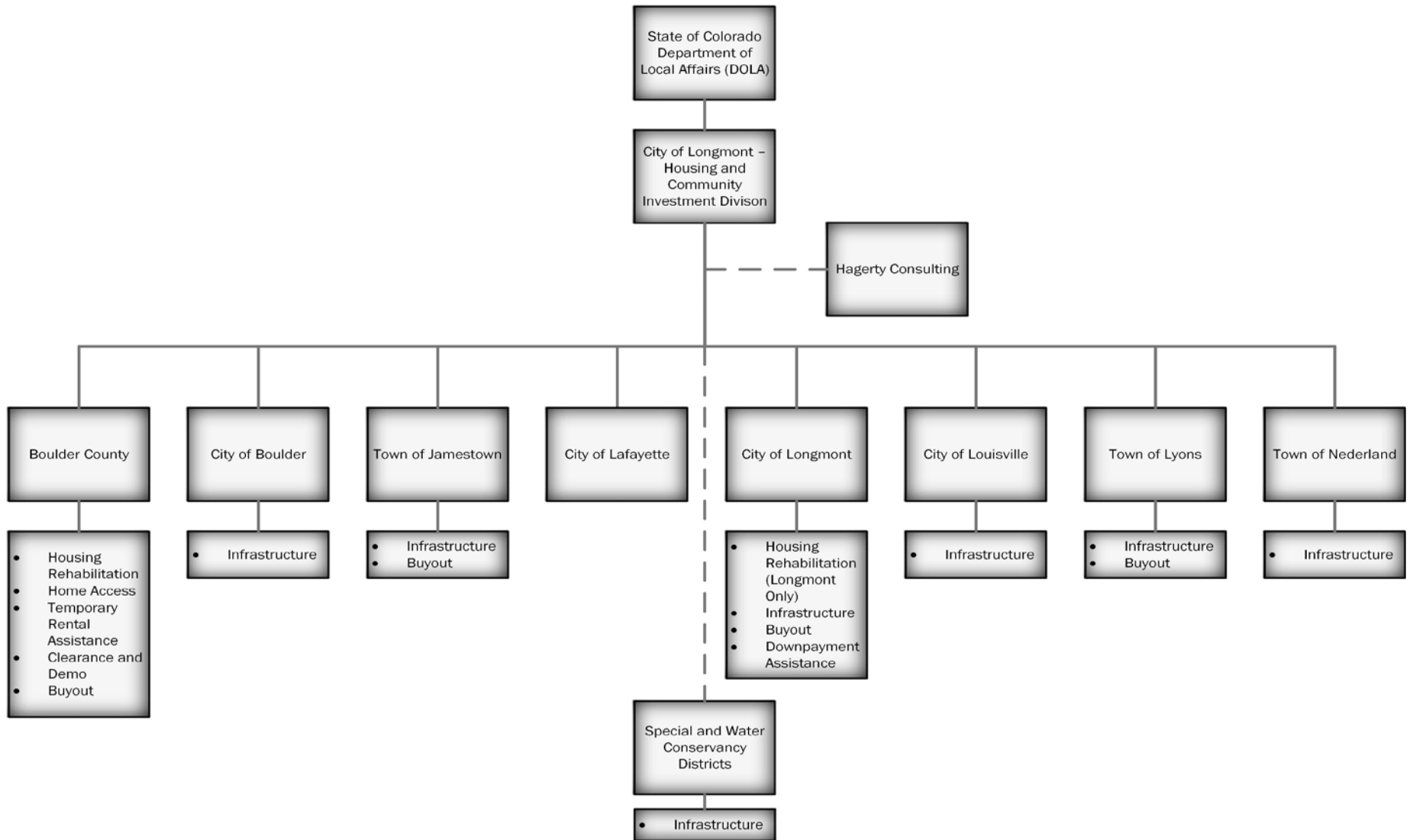
Monitoring forms that are applicable will be used to review the project and any findings or concerns will result in a letter to the community and may trigger a formal monitoring of the community. A narrative of the desk review, any issues, any responses from the community and a summary of future action, if any is needed, will be placed in Salesforce and uploaded into the State's Monitoring and TA Tracker.

### **Training**

The BCC staff are committed to providing needed Training to our Partners to try to avoid any issues or complications in the management and implementation of a project or program. Subjects of past or proposed trainings include – HMGP regulations vs CDBG-DR regulations, FEMA match, Procurement, Relocation and URA, Davis-Bacon, Salesforce, Environmental review, Compliance, Income Calculations, Buyout requirements. Trainings may be provided on-site in the community or in a central location for a group of Partner agencies. We have also conducted trainings over the phone or via conference call. The BCC will keep the State's Monitoring and TA Tracker as up to date as possible.

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# Boulder County Collaborative (BCC) Organizational Structure



# BOULDER COUNTY COLLABORATIVE



Weighted Risk Assessment										
Sub-Recipient	Funding Source	Risk Category						Scoring		
	CDBG-DR	Funding:	Number of Activities (Active):	CDBG Experience:	Turnover of Staff:	Single Audit:	Housing or Economic Development Activities:	Infrastructure Activities:	Score	Risk
		> \$4M (10 pts) \$1M - \$4M (5 pts) < \$1M (1 pt)	4 or more (10 pts) 2-3 (5 pts) 1 (1 pt)	0 - 2 yrs (10 pts) 3-5 yrs (5 pts) > 5 yrs (1 pt)	2 or more key staff (10 pts) 1 key staff (5 pts) No turnover (0)	> 4 Findings (10 pts) 2-3 Findings (5 pts) 1 Finding (1 pt) No Finding (0 pts)	Yes (10 pts) No (0 pts)	Yes (5 pts) No (0 pts)		
Boulder County	X	10	10	10	10	10	10	5	65	High
City of Boulder	X	10	5	1	0	5	0	5	26	Medium
City of Longmont (Internal)	X	10	5	1	0	0	10	5	31	Medium
City of Louisville	X	1	1	10	0	0	0	5	17	Low
Town of Lyons	X	10	10	10	10	1	0	5	46	High
Town of Nederland	X	1	1	10	10	0	0	5	27	Medium
Town of Jamestown	X	10	10	10	0	0	0	5	35	Medium
St. Vrain Water Conservancy District	X	1	1	10	0	0	0	5	17	Low

\* Needs to be updated each Audit Year

Programmatic Review

All grant recipients, regardless of risk category assigned, shall undergo programmatic review a minimum of every 12 months.

Activity/Project Review

High (36+ pts)	100% of infrastructure activities/projects after reimbursement has occurred on key components of the project (i.e. construction), unless an extended timeframe of open projects or extraordinary circumstances warrant additional monitoring; minimum of 10% of housing files per program.
Medium (26-35 pts)	At least 50% of activities/projects after reimbursement has occurred on key components of the project (i.e. construction).
Low (<25 points)	At least one (1) activity/project once before final reimbursement







**DETAIL OF MONITORING SCHEDULE**

Sub-Recipient	Level	Completed?	Date	Programs to be Monitored
Boulder County	High	X	January 2017	Programmatic & HAP
			January 2019	Programmatic & CDBG-DR Buyouts
			January 2019	HMGP Buyouts
			April 2019	TBD R3 Infrastructure
			June 2019	TBD R3 Infrastructure
			August 2019	TBD R3 Infrastructure
			October 2019	TBD R3 Infrastructure
City of Boulder	Medium	X	September 2017	Ponderosa MHP
		X	June/October 2018	Wonderland Creek
City of Longmont (Internal)	Medium	X	April 2019	Resilient St. Vrain
City of Louisville	Low		July 2017 (HUD) July 2018 (HUD)	HAP
Town of Lyons	High		September 2017	Programmatic & Raw Water Diversion
		X	April 2017	Debris Removal
		X	June 2018	Programmatic & CDBG-DR Buyouts
		X	June 2018	Northern Overflow
		X	October 2018	HMGP Buyouts URA
		X	November 2018	McConnell Bridge
			April 2019	Public Works Building
			June 2019	Programmatic & EDA Utilities Match
			August 2019	CPW Trail
Town of Nederland	Medium		October 2019	Roadway Pavement
Town of Jamestown	Medium	X	August 2018	Programmatic & Roadway Drainage Improvements
		X	June 2018	Programmatic & HMGP Buyouts
		X	October 2018	Rain Gauge
			December 2018	James Canyon Reconstruction
			February 2019	Lower Main Street Bridge
St. Vrain Water Conservancy District	Low		March 2019	PW 684 Coordinated Match
			April 2019	Gillespie Gulch
			June 2019	Lake 4



### Monitoring Status

Sub-Recipient	Project/Program	Notification	Date Monitored	Monitoring Letter	Agency Response	Items Resolved	# of Findings	# of Concerns	Status/Notes
Boulder County	Programmatic & HAP	1/6/17	1/31-2/3/17	4/10/17 & 11/1/17	6/29/17	1 Finding and 3 Concerns resolved	2	4	Pending State Findings/Concerns resolution
Boulder County	Programmatic & CDBG-DR Buyouts								On-site monitoring scheduled for January 2019
Boulder County	HMGP Buyouts Global Match								Desk monitoring scheduled for January 2019
Boulder County	TBD R3 Infrastructure								Tentatively scheduled for April 2019
Boulder County	TBD R3 Infrastructure								Tentatively scheduled for June 2019
Boulder County	TBD R3 Infrastructure								Tentatively scheduled for August 2019
Boulder County	TBD R3 Infrastructure								Tentatively scheduled for October 2019
Boulder County	TBD R3 Infrastructure								Tentatively scheduled for December 2019
City of Boulder	Programmatic & Ponderosa MHP	8/30/17	9/25/17	10/25/17	12/5/17		0	0	Recommendation implemented 12/5/17
City of Boulder	Wonderland Creek	6/4/18	6/4/18 & 10/9/18	6/11/18 & 10/9/18	NA		0	0	Desk monitoring
City of Longmont (Internal)	Resilient St. Vrain								Tentatively scheduled for April 2019
City of Longmont (Internal)	HAP						0	0	Monitored by HUD in July 2017 and July 2018
City of Louisville	Programmatic & Raw Water Diversion	8/30/17	9/27/17	11/22/17	NA		0	0	
Town of Lyons	Debris Removal	4/3/17	5/26/17	8/18/17	NA		0	0	Desk monitoring
Town of Lyons	Northern Overflow	6/8/18	6/8/18	9/4/18	7/23/18	1	1	0	Desk monitoring
Town of Lyons	Programmatic and CDBG-DR Buyouts	5/30/18	6/28/18	TBD			2	0	On-site monitoring
Town of Lyons	HMGP Buyouts URA	9/7/18	9/21/18	10/18/18	NA		0	0	Desk monitoring
Town of Lyons	McConnell Bridge	10/23/18	11/14/18						Desk monitoring
Town of Lyons	Public Works Building								Tentatively scheduled for April 2019
Town of Lyons	Programmatic & EDA Utilities Match								Tentatively scheduled for June 2019
Town of Lyons	CPW Trail								Tentatively scheduled for August 2019
Town of Lyons	Roadway Pavement								Tentatively scheduled for October 2019
Town of Nederland	Roadway Drainage Improvements	7/11/18	8/15/18	TBD					Report due to Partner 9/15/18, waiting for info from Nederland
Town of Jamestown	Programmatic & HMGP Buyouts Global Match	5/30/18	6/26/18	09/04/18	9/19/18	1	0	2	Concern regarding 2017 Audit resolved, Concern regarding advance funding policy open as of 10/23/18
Town of Jamestown	Rain Gauge	9/24/18	9/25/18	10/24/18	NA		0	0	Desk monitoring
Town of Jamestown	James Canyon Drive Reconstruction								Scheduled for November 2018
Town of Jamestown	Lower Main Street Bridge								Tentatively scheduled for February 2019
Town of Jamestown	PW 684 Coordinated Match								Tentatively scheduled for March 2019
Town of Jamestown	Gillespie Gulch								Tentatively scheduled for April 2019
St. Vrain Water Conservancy District	Lake 4								Scheduled for June 2019