



# Community Development Block Grant FY2018

## CONTRACT MANUAL (July 1, 2017 through June 30, 2018)

### Section 1: *Program Performance & Compliance Regulations*

This section provides guidelines for program reporting and describes regulations regarding participant income & residency eligibility and program site visits.

The Program Management Division of the Office of Workforce Development (OWD) monitors all programs that receive funding through grants administered by OWD. Program monitoring is an overall effort to improve and/or guarantee:

- The quality of services to Boston residents;
- Adequate fiscal and administrative compliance to show funds are spent properly;
- Identification of programs in need of technical assistance, and;
- Verification of contractor's compliance with federal regulations, EDIC policies and procedures, and terms and conditions of the contract.

The program monitoring activities described in this manual are required of Community Development Block Grant recipients not only to keep OWD abreast of the progress of your program, but also to aid your evaluation of program design and the success of activities undertaken.

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## CONTACT INFORMATION FOR OWD PROGRAM MANAGEMENT STAFF

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## 1. REPORTING GUIDELINES

1. OWD requires grant recipients to enter CDBG **Participant demographic** into the Online Enrollment Website: <https://cdbgverify.boston.gov/> - Only count participants who are Boston residents or who lived in Boston before becoming homeless.
2. OWD requires CDBG recipients to submit **Quarterly Reports**. The quarterly reports entail a series of questions designed to provide your Contract Administrator with a general idea of how well your program is running.
  - a. Reports are always due by the **10th business day** of the month following the reporting period. Contact your Contract Administrator *prior* to the deadline, if you need an extension.

1<sup>st</sup> quarter (July 1<sup>st</sup> – September 30, 2017)

due October 16, 2017

2<sup>nd</sup> quarter (October 1<sup>st</sup> – December 31, 2017)

due January 16, 2018

3<sup>rd</sup> quarter (January 1<sup>st</sup> – March 31, 2018)

due April 13, 2018

- b. To begin reporting, you don't need to wait to get your FY18 contract number. If your contract has not been executed by the time the first quarterly report is due, submit the report with the contract number blank. To report on CDBG-funded program objectives, you'll need a copy of the FY17 program performance sheet that was submitted with your contract documents.
  - c. E-mail your quarterly reports to your Contract Administrator:

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- d. Our office requires a program report to process the invoice for that quarter, therefore, any delays in submitting a quarterly report will result in your program's invoice being held back. We suggest internal reminders between program and fiscal staff at your agency to ensure both the quarterly report and invoice are submitted on time.
3. The **Final Report** is due on July 16<sup>th</sup>, 2018 and covers the entire contract period, from **July 1, 2017 through June 30, 2018**. The final report requires more details to provide OWD an accurate account of your program's overall performance. OWD will email the final report forms to you later in the year.
    - a. It is extremely important for your final report to be complete, accurate and on time. OWD compiles data from final reports and invoice, and reports it to the Department of Neighborhood Development (DND) who, in turn, submits an annual performance measurement report to the Department of Housing and Urban Development (HUD) detailing how CDBG funds were spent by each CDBG-funded program. Late, incomplete, or inaccurate final reports reflect poorly on CDBG agencies and impact DND's ability to comply with federal requirements.
    - b. If you are not responsible for preparing CDBG invoices yourself, you will need to consult with your fiscal department to be able to gather information about the amount of CDBG funds spent this year and amounts from other funding sources that supported the CDBG program this contract year.
    - c. As with quarterly reports, the final report is required to process the final invoice. OWD will not issue final payments until your agency submits its final program report.

## QUARTERLY REPORTS

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A well-prepared quarterly report will successfully portray the quality of services your program provides to low-income Boston residents and save you time in revisions. Please familiarize yourself with the CDBG reporting procedures and contact your Contract Administrator if you have questions.

To prepare your quarterly report, you'll need:

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- *A copy of the FY18 Program Performance Sheet submitted with your CDBG contract documents*
  - *The total number of participants enrolled*
  - *Data collected by your program to measure participants' year-to-date progress in achieving objectives and outcomes*
  - *FY18 Quarterly Report forms*
  - *Patience!*

## Before preparing the Quarterly Report – Participant Income & Residency Eligibility

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Only *low income Boston residents* qualify as CDBG beneficiaries. Therefore, you must verify participants' eligibility every year before counting them as CDBG beneficiaries.

It is your program's responsibility to ensure all demographics collected are accurate, and that back-up documentation was reviewed to verify each participant's income and residency eligibility.

It helps when participants understand that as a CDBG recipient you are required to collect this information to show that the federal funds that pay for your CDBG program services are going to Boston residents who otherwise wouldn't be able to afford them.

To be able to check off the appropriate '*Source of Income Documentation*' box on the CDBG form, you may use any back-up document from this list to verify participants' eligibility:

1. Pay Stubs or W-2
2. Masshealth Card
3. Housing Authority Verification
4. Alimony Agreement
5. Public Assistance Check
6. Pension Statement
7. Social Security Benefits
8. Unemployment Insurance Documents
9. Letter approving Commonwealth Care Insurance
10. Authorization to Receive Cash Public Assistance
11. Award letter from Veterans Administration
12. BPS info on percent of low-income youth at the school\*
13. Written Statement from Shelter/Social Service Agency
14. Written Statement from other Federal, State, or Local Agency

*\*To use option 12, now that all Boston Public Schools offer universal free lunch, access [www.bostonpublicschools.org](http://www.bostonpublicschools.org) to determine the percentage of students who are low-income.*

## QUARTERLY REPORT

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### **SECTION I** – Enrollment & Summary for the reporting quarter

We ask for information regarding the number of CDBG participants enrolled in the quarter and the back-up documents your program uses to verify their eligibility. Some programs are fully enrolled by the first and second quarters, others have a steady flow year-round. *Contact your Contract Administrator if your program is having difficulty meeting its planned enrollment goals.*

We ask you to report on CDBG program activities and highlights; and staffing or administrative issues that took place during the quarter. If any major issues occurred such as staff vacancies or program recruitment difficulties, don't wait to notify OWD through the quarterly report. Instead, *contact your Contract Administrator immediately* and document in your report that you've communicated these issues to OWD and describe the steps taken to address such issues.

### **SECTION II** – Year-to-date progress

**Question #7 in the Quarterly Report** asks for your program's year-to-date progress based on the objectives and outcomes you described in your Program Performance Sheet. The Program Performance Sheet is the most comprehensive section of your report. We use the information you provide to compare your program's actual performance against contractual performance standards. Without accurate quarterly reports from agencies, OWD cannot verify that programs are operating satisfactorily.

Specifically, OWD is looking for a detailed description of your program's status to date, including:

- the *number of participants* who are currently working toward the CDBG goals listed in your Program Performance Sheet;
- the *number of participants who have completed outcomes* so far; and
- your assessment about how program activities assist your target population to attain self-sufficiency.

OWD combines information from your quarterly and final reports with observations and data gathered by the contract administrators at site-visits. The more details you provide, the easier it will be for OWD to appreciate the success of activities undertaken. As the contract year progresses, the year-to-date progress section in your report should have cumulative information on your activities and outcomes.

### **EXAMPLE of Year-to-date progress**

Questions? Staff Contact Info on page 2

Describe participants' progress toward program outcomes. This information is cumulative and should include information from the beginning of the contract period to date.

**Year-to-date on Outcome 1:** Of the 40 participants we are contracted to serve, we have enrolled 30 thus far (25 in the first quarter and 5 in the second quarter). 28 out of 40 program participants (70%) have completed their resume and cover letter. 20 out of 40 contracted program participants (50%) have also submitted job applications. One participant left the program in the first quarter due to relocating to another state.

**Year-to-date on Outcome 2:** Ten participants (25%) have found employment to date. Two participants are working at a local supermarket (at \$10/hour, three were hired as a housekeeper in a local hotel (at \$12/hour). Five participants have started working at Mass General Hospital in various Administrative and Technical positions making \$16-\$20/hour. The program will continue to provide resources for these participants to help them increase their wages or find additional employment opportunities.

**Year-to-date on Outcome 3:** All 30 participants enrolled year-to-date, have completed the computer workshop. 25 completed the workshop in the first quarter and 5 completed the workshop in November.

### **SECTION III – Program Contact Information**

To make sure that at any given point in the year we are communicating with appropriate staff at your agency, OWD requests updated contact information every quarter. This will ensure that notifications on program, fiscal or future funding opportunities are delivered to the contact people assigned by your agency. We want to avoid missed deadlines or unresolved issues that may result in delayed reimbursement and, in some cases, loss of funding.

## PROGRAM REVIEWS

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As part of the process to assess agencies' performance, each quarter, program monitors will issue reviews for all reports. *A satisfactory rating indicates your report was complete, accurate, and on time.*

### Reviews will indicate follow-up needed in any of the following areas:

- Late submission of reports or invoices, without prior approval for an extension from OWD staff.
- Vague year-to-date descriptions of program outcomes.
  - *We are looking for the number of participants that achieved each outcome and enough details about how their progress to date will enable them to meet the program objectives.*
- Incorrect Beneficiary Data/Information.

OWD encourages contractors to maintain communication with Contract Administrator; not only to keep them abreast of any issues, but also as an available source of technical assistance. Incomplete or inaccurate reports won't allow OWD to capture and report accurate data to the Department of Neighborhood Development (DND). Failure to respond/correct mistakes in a timely manner may lead to your program being subjected to further corrective action. OWD takes program reviews into consideration when evaluating agencies' overall performance for future funding.

You'll be able to access your quarterly program reviews electronically by viewing them as a shared Google document with your program monitor.

## SITE VISITS

OWD will conduct site visits with CDBG grantees at a minimum, annually. Site visits are needed to ensure programs are progressing towards objectives and outcomes outlined in your agency's proposal. Site visits are also conducted to ensure that contractual regulations (i.e. service to low income, Boston residents) are followed. During the site visit, your Contract Administrator will request to see income and residential verification documents on file for each CDBG-funded participant.

During your site visit, the Contract Administrator will also conduct a review of the program activities, your administrative process (recruitment and enrollment process, data collection and how income is documented) and physical space in which the activity is being held. The Contract Administrator should discuss with you at the time of the site visit any issues that would cause your program to be cited for a finding (described on page 11).

After completing the site visit, your Contract Administrator documents the information gathered in a site visit monitoring report that is reviewed by the Program Manager. A copy of this report will be e-mailed to the program to keep on file.

In addition to this site visit, a member of the City of Boston's Auditing Department may request a visit to your program to review your financial records.

Contract Administrators can also attend special events held by your agency in addition to required monitoring visits. Please notify your Contract Administrator of any special events you have planned during the contract year if you would like them to attend.

## TECHNICAL ASSISTANCE

OWD program management staff provides technical assistance to contractors on an 'as needed' basis in response to program difficulties documented in quarterly reports or learned about during site visits and/or through ongoing communication with programs. Technical assistance helps programs overcome barriers that impact program outcomes and is NOT meant to single out or punish programs in any way. Examples of common technical assistance requests include:

- To address difficulty meeting enrollment or program goals set forth in your contract
- To request guidance on how to prepare reports, invoices or budget revisions
- To address staff vacancies or turnover that resulted in unspent funds or reduced program activities
- To request clarification on appropriate back-up documentation for invoices

## INVOCATION OF A FINDING / CORRECTIVE ACTION

A finding is a violation of law or regulation that can result in corrective action. The OWD Acting Program Manager or the Contract Administrator will initiate corrective action for the following situations:

- When a regulatory violation has occurred (violation of contract or monitoring requirements, i.e. no report submitted, low income levels not met etc.) that is unexplained;
- When participants' health or safety is threatened;
- When primary contracted services have not been delivered;
- When funds have been improperly expended; or
- There is an unexplained variance of 15% below planned enrollment levels; and
- There is a misrepresentation of a material nature regarding invoices and programmatic reporting.

*Possible sanctions include contract termination, contract suspension, suspension of payments, and referral to appropriate federal/state/local legal authorities.*

We urge contractors to contact Program Management Staff immediately to address any of the above issues. OWD offers contractors every opportunity to respond to corrective action requests, in accordance with the terms and conditions outlined in the contract document.