U.S. Department of Housing and Urban Development Office of Community Planning and Development Community Development Block Grant (CDBG) Program



MANAGING CDBG A GUIDEBOOK FOR GRANTEES ON SUBRECIPIENT OVERSIGHT



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CHAPTER 4 ORIENTATION, TRAINING, AND TECHNICAL ASSISTANCE

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INTRODUCTION

NOTES

This chapter explains how you can use these tools to build a more efficient and effective program and improve your management and monitoring processes by anticipating and avoiding otherwise inevitable problems early in your program.

IMPORTANCE OF ORIENTATION, TRAINING, AND TECHNICAL Assistance

The time you invest to develop your orientation, training, and technical assistance programs will help you:

- Enhance the productivity of your subrecipients,
- Improve the quality of services available in your community, and
- Reduce the administrative demands placed on you and your staff.

HOW ORIENTATION, TRAINING, AND TECHNICAL ASSISTANCE DIFFER

While these approaches to educating your subrecipients have a shared focus on enhancing performance and reducing problems, they differ with respect to emphasis, timing, and target audience.

- **Orientation sessions**, typically held for either individual subrecipients or groups of subrecipients at the beginning of the program, tend to address broad program objectives and requirements.
- **Training sessions** are conducted periodically throughout the year to address specific program areas and include larger groups of subrecipients.
- Technical assistance is offered to individual subrecipients when the activity is in progress.

ORIENTATION SESSIONS

Orientation sessions provide your subrecipients with an overview of the CDBG program and general program requirements. While it is easy to minimize their value, especially if you are balancing limited staff resources, they can help improve your program operations.

Orientation sessions will provide you with an opportunity to:

- Open—or re-establish—lines of communication with your subrecipients,
- Reinforce the basic rules and requirements of your CDBG program,
- Establish clear expectations concerning performance standards,
- Explain program policies and procedures,
- Acknowledge and address past compliance problems, and
- Discuss potential challenges.

Use your Subrecipient Agreement as a training tool during the orientation. By making extensive use of the agreement, you emphasize its importance and encourage your subrecipients to refer to the agreement for guidance on program policies and procedures throughout the program year.

Orientation Options

- **One-on-one orientation sessions** focus on individual subrecipients and are often limited to new subrecipients.
- **Group orientation sessions** are structured opportunities to meet with multiple subrecipients in a single session.

Benefits and Limitations of Orientation Options

Consider the benefits and drawbacks of one-on-one and group orientation sessions before you decide which option works best for your program.

One-on-One Orientation Sessions						
Benefits	Limitations					
 Tailored to the needs of the individual subrecipient. 	 May be an inefficient use of time and resources. 					
Greater involvement of subrecipient staff.Opportunity to assess the subrecipient's	 Rules out peer group learning and interac- tion. 					
understanding of essential material.Avoids an overly bureaucratic presentation that can intimidate new subrecipients.	 The structure may understate the im- portance of consistent compliance with regulations. 					
• Fewer logistics to organize and less costly.	 May result in inconsistency of the presen- tation and on the issues emphasized. 					
	 More easily ignored if not fully integrated into your monitoring program. 					

Group Orientation Sessions							
Benefits	Limitations						
 Large numbers of subrecipients get the same message at the same time. 	 More effort required to prepare, coordi- nate, and deliver. 						
 Supports the use of a structured agenda aimed at major fiscal and program report- ing responsibilities. 	 Benefit of group setting lost if subrecip- ients are unable to send more than one representative. 						
 Encourages subrecipients to have several staff members take part in the orientation. 	 Difficult to cover information that is relevant to every organization in attendance. 						
 Increases familiarity with program re- quirements throughout the subrecipient 	 Difficult to assess the subrecipients' understanding of essential material. 						
organization.	Greater need to adapt material to respond						
 Generates interaction and an exchange of information between new and experi- 	to experience and comprehension levels of subrecipients.						
enced subrecipients.	• Key subrecipient staff may be less likely to						
 Emphasizes the importance of program rules and regulatory compliance. 	attend.						

Subrecipient Participation

Minimize the number and severity of monitoring issues that may come up during the program year by inviting both new and current subrecipients and their staff to participate in the orientation.

Encourage subrecipients to send more than one representative to the session. If they are unfamiliar with the program, extend an invitation to their Executive Director, Chief Fiscal Officer, and Board of Directors.

Participation Incentives

Entice reluctant subrecipients (typically your most experienced subrecipients) to take part in the orientation by:

- Inviting them to share their program experience with other participants during the session,
- Highlighting new program guidelines and regulations covered during the session,
- Handing out executed Subrecipient Agreements during the session,

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- Requiring attendance as a consideration for future awards,
- Incorporating an awards ceremony recognizing exceptional programs, and/or
- Hosting a networking opportunity at the close of the session.

TRAINING SESSIONS

Training sessions, held periodically throughout the program year, tend to focus on a specific topic with detailed, technical information presented to participants.

An effective training program offers many benefits:

- · Increased compliance with program rules and regulations,
- · Improved long-term ability and overall performance of your subrecipients, and
- Provision of more efficient and effective services to the community.

Types of Training Sessions

- **Issue-specific** training sessions cover single topics which, because of their broad applicability, are relevant to many—if not all—of your subrecipients.
- Activity-specific training sessions focus on topics associated with a specific activity area and will be relevant only to select subrecipients.
- **Issue-specific and activity-specific** training sessions are held with targeted subrecipients that, because of their specific activity, are more likely to run into monitoring problems. The sessions typically concentrate on basic administrative systems and specific performance challenges.

Suggested Training Topics

The results of your ongoing monitoring efforts will help you identify the training needs of your subrecipients.

Potential training topics include:

Issue-Specific Training Topics	Activity-Specific Training Topics
 Financial control systems and procedures IDIS reporting requirements National objective compliance Procurement methods Relocation/anti-displacement Davis-Bacon Act Historic preservation Lead-based paint requirements Liens and recapture agreements Accessibility requirements 	 Housing rehabilitation and development (including the use of escrow accounts) Public services Economic development or commercial improvements Public facilities and infrastructure Administration or planning activities Acquisition, demolition, or disposition Section 108 loan guarantees

Training Design

Successful training programs are relevant, useful, and persuasive.

A well-designed training program will:

- Have some direct connection with the daily experience and concerns of your subrecipients.
- Demonstrate new techniques to increase their productivity and/or reduce problems.
- Motivate your subrecipients to act, change behavior, learn new ways of doing things, solve problems, or improve their performance.

The Resources section of this Guide includes an example of how you might structure a day-long training session on relocation and anti-displacement requirements for CDBG projects (see <u>Sample Training Curriculum</u>). The format covers topics and methods organized around a single theme.

Effective Training Techniques

Learning styles are as varied as your subrecipients. The more ways you can present information during the training session, the more likely your subrecipients will remember the material. Include, to the extent possible, a combination of short lectures, visual presentations, and small group activities in your training sessions. Translate written materials and arrange for needed interpreters.

In lecture and presentation settings, distribute:

- Written summaries of key points of oral presentations, and
- · Copies of presentation slides.

To keep participants actively engaged in the training—and better able to retain what they learned—consider the use of:

- Role-playing simulations
- Problem-solving exercises
- Panel discussions
- Demonstrations
- Case studies
- · Games and quizzes

Logistical Considerations

Decisions you make about when and how to structure the training session will affect the number of participants you can expect to attend.

- When are your subrecipients most likely to be available?
- Can the training be provided remotely?
- If offered remotely, do they have the technical capacity to participate?
- If offered in-person, is there an appropriate facility available to hold the session?

While training sessions have traditionally required participants to attend in person, the use of online and computer-based training tools have become an increasingly attractive and affordable alternative. Before scheduling your training session, consider your online options:

- Virtual online meetings
- Video conferences
- Audio conferences
- Webinars

A listing of <u>Factors to Consider when Scheduling a Training Session</u> is included in this Guide's Resources section.

Training Resources

Take advantage of the training resources developed by HUD. A variety of program guides, training tools, and webinars are available online at the <u>HUD Exchange</u> which can serve as the centerpiece of your training program. They are also helpful when training your staff.

Online resources include:

- Basically CDBG for Entitlements
- Basically CDBG for States
- Guide to National Objectives and Eligible Activities for CDBG Entitlement Communities

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- Guide to National Objectives and Eligible Activities for State CDBG Programs
- Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems
- <u>Training CDBG Subrecipients in Administrative Systems</u>
- <u>State CDBG Grant Administrator Training</u>
- IDIS for CDBG Entitlement Communities—Training Manual and Slides
- IDIS Online for State CDBG Grantees—Training Manual and Slides
- <u>CDBG Economic Development Toolkit</u>
- <u>CDBG Crosscutting Issues Toolkit</u>

TECHNICAL ASSISTANCE

Often conducted in response to a specific request from a subrecipient, technical assistance tends to be reactive and aimed at addressing existing program or administrative issues. Keep in mind that it is usually not a one-time event and, like your ongoing monitoring efforts, may require frequent interactions.

Whenever possible, broaden the focus of your technical assistance to emphasize the importance of overall program quality and constant improvement by providing your subrecipients with new knowledge and skills.

One-on-One Technical Assistance

Much of your technical assistance will be conducted on a one-on-one basis with your subrecipient. However, there may be occasions when it is appropriate to include several staff members from one subrecipient, or staff from several subrecipients.

Technical assistance can be provided on-site or remotely. It can involve the distribution and explanation of materials, the demonstration of approved techniques, a discussion of ways to improve operations, or a simple response to an inquiry about a specific process. On-site technical assistance offers additional opportunities to observe subrecipient staff in their normal activities and develop relationships.

Remote Technical Assistance

Technical assistance can also be provided to your subrecipients remotely.

This works best in cases where the problem is routine or is a simple inquiry about a specific process. A telephone call or e-mail is appropriate, for instance, when your subrecipient has a question about filling out a specific form or is seeking advice on the implementation of a routine administrative procedure.

Delivering Technical Assistance

Technical assistance is supposed to clarify, instruct, or correct matters for subrecipients. To provide the best possible assistance to your subrecipients, it is important that you:

- **Respond promptly.** Making subrecipients wait weeks before you respond sends a strong message that their request for help is not important.
- **Be relevant.** Make sure you address the issues raised by your subrecipient and not merely what you feel is important.
- **Provide accurate information.** If you or your staff are not sure of the correct answer to a question, take the time to get the proper answer or interpretation before sharing it with your subrecipient.
- Acknowledge the capacity of your subrecipient. When offering guidance on how to satisfy technical or regulatory requirements, recognize that your subrecipient may have limited funds, time, and staffing resources available to them.
- **Evaluate the comprehension of your subrecipient.** Test your subrecipient's understanding of the information you provide by asking how it would apply to a hypothetical situation.



• **Follow up.** Schedule a follow-up with your subrecipient to determine how well they have mastered the information or skills.

VOTES

Pre-Monitoring Technical Assistance

An effective strategy for helping your subrecipient improve performance is to conduct a pre-monitoring technical assistance meeting.

A pre-monitoring meeting with your subrecipient will help your subrecipient:

- · Identify what you will cover during your formal monitoring; and
- Learn from your informal assessment of the adequacy of their systems, procedures, and records.

If scheduled several months before your formal monitoring takes place, you will give your subrecipient:

- An opportunity to raise questions outside of the formal monitoring process,
- An appreciation of the importance of following program regulations, and
- Time to correct deficiencies and avoid written monitoring findings.

EVALUATION TECHNIQUES

It is important to evaluate the effectiveness of your orientation training and technical assistance efforts and to measure your subrecipient's understanding of your program rules and regulations. Determine early in the process the type of evaluation that is right for your program.

Types of Evaluations

There are two types of evaluations you can use to determine which elements of your efforts were successful and which need improvement.

- Outcome evaluations focus on whether the program was effective.
- Process evaluations focus on the design of the program.

Outcome Evaluation Techniques

Options for evaluating your subrecipients' understanding of the material you present during your orientation sessions, training programs, and technical assistance efforts include:

- Testing their knowledge of the topic before your training session begins and measuring what they have learned after the training session ends.
- Informal visual confirmation of their understanding of the material during interactive elements of your training session (case study discussions, role-playing exercises, etc.).
- Comparing the number of new or continuing findings you encounter during your monitoring visits.
- Measuring changes in their productivity (for example, the number of housing rehabilitation projects completed or the number of young adults taking part in a summer employment program).

Process Evaluation Techniques

Another way to assess your orientation, training, and technical assistance efforts is to ask your subrecipients how valuable and relevant they were.

Getting feedback from your subrecipients is important and can help improve your program. Evaluation tools often used by grantees include:

- Evaluation forms
- Questionnaires
- · Follow-up interviews

Ask your subrecipients to measure how much they agree or disagree with various statements,

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rating them on a scale of "0" (strongly disagree) to "5" (strongly agree). Keep your questions simple. Ask for specific suggestions on how to improve the experience. Allow anonymous responses to ensure candor.

NOTES

Questions to ask your subrecipients can include, for example:

- Did you feel that the orientation or training session was worth your time?
- Did you think that it was successful?
- What were the biggest strengths and weaknesses of the training?
- Were the training activities engaging?
- What are the three most important things that you learned from this training?
- From what you learned, what do you plan to apply in your job?
- What support might you need to apply what you learned?

Soliciting the opinion of your subrecipients will show that you value their input. Let them know that you want to help make their job easier and their program more productive. You really do have something of practical benefit to offer them.

CONCLUSION

In this chapter, you learned how to design and conduct effective orientation and training sessions and provide technical assistance to your subrecipients.

You should now be able to:

- Understand the differences between orientation sessions, training, and technical assistance.
- Design issue-specific and activity-specific training programs.
- Offer technical help to your subrecipients.
- Evaluate the effectiveness of your orientation, training, and technical assistance efforts.
- Measure your subrecipients' understanding of the rules and regulations of your program.

FACTORS TO CONSIDER WHEN SCHEDULING A TRAINING SESSION

The following provides general guidance as you organize your planned training session. It is not a comprehensive listing and does not fully address the technology resources you will need to consider if your training is offered remotely.

Develop an Agenda

Develop a preliminary agenda and design for the training session.

- How much time will it take to cover the selected topic?
- How will the training material be presented?
- What equipment and materials will you need to present the information?

Scheduling the Event

Schedule the training, picking a date and time that will work for targeted participants.

- Dates to avoid
 - CDBG program deadlines
 - Federal or local holidays
 - Religious holidays (e.g., Christian, Jewish, Islamic, etc.)
 - · Local school holidays (e.g., spring or winter recess)
 - Major national or local political or sporting events
 - · Mondays and Fridays, weekends

Selecting a Venue

Select a venue—physical or virtual—that is appropriate for the training session.

- · Site options
 - · Your facility or another site under your control
 - Current subrecipient facility
 - Local venue (e.g., conference facility, community meeting space, institutional facility, etc.)
 - · Remote or virtual meeting
- · Availability
 - · Is it available on the date you have selected?
 - Is it available for the entire time you have budgeted for the training?
- Location
 - · Is it centrally located? Is it easy to find?
 - Is it accessible by both public transportation and private vehicles?
 - Is parking provided? Will participants be charged for parking?
 - If the training will take more than one day, is lodging available nearby?
- Physical Considerations
 - · Can disabled participants be accommodated?
 - Is the space large enough?
 - How are the sightlines? Will everyone be able to see the speakers and presentations?
 - How flexible is the space? Can the space be reconfigured for role-playing and small group discussions?
 - Is there a suitable space available for social interaction and networking?

- Are the chairs comfortable? Are the tables large enough?
- Is the lighting adequate?
- Can the room be easily heated or cooled?
- Will participants be distracted by the sound of activities in adjoining rooms?
- Is the facility adequately furnished, clean, and well maintained?
- Will your participants feel safe attending training there?
- Technical Considerations
 - The quality, capability, and availability of needed AV equipment
 - Is Wi-Fi available? Is the internet connection reliable?
 - Is tech support provided? Is staff competent and responsive?
- Catering Options
 - Can they provide food and beverages for scheduled breaks?
 - Are healthy food options available?
 - If not, can you bring in your own refreshments
- Cost
- Is there a cost to use the space?
- Are there other fees that may apply (e.g., parking, AV equipment, etc.)?
- Is there a cancelation fee?
- Are they open to negotiating the fees?
- Do you have the funds available to cover predicted training costs?

SAMPLE TRAINING CURRICULUM ON THE UNIFORM RELOCATION ACT (URA)

<u>NOTE TO GRANTEES</u>: The requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) and the Relocation Assistance Plan under section 104(d) of the Housing and Community Development Act of 1974 (HCDA of 1974) are very complicated and technical. When the grantee executes the required certifications, it assures that all statutory and regulatory requirements will be met. Regardless of the tasks delegated to a subrecipient, the grantee remains liable for any costs arising from noncompliance with the law or regulations. For these reasons, HUD believes that few subrecipients will have or acquire the expertise to carry out all these requirements and that generally, it is not in the interest of the grantee to delegate completely the tasks required under these laws. Before conducting any training for subrecipients on this subject, the grantee must decide exactly which functions it will perform and those it expects the subrecipient to perform.

9:00 a.m. – 9:15 a.m.	a.m. – 9:15 a.m. Introduction and welcome					
9:15 a.m. – 10:30 a.m.	Applicable regulatory requirements					
	 Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) 					
	 Section 104(d) Relocation Requirements ("Barney Frank Amendments" to Title I of the Housing and Community Development Act of 1974) Other Relocation Requirements 					
10:30 a.m. – 10:45 a.m.	Break					
10:45 a.m. – 12:00 noon	Roles, procedures, and types of assistance					
	Presentation on grantee and subrecipient roles relative to relocation and real property acquisition:					
	Functions that the grantee should routinely undertake itself are:					
	 The issuance of notices of eligibility for relocation assistance. The provision of advisory services to businesses. Social service referrals for difficult cases. Review and approval of relocation claims and processing of relocation payments. Processing of appeals. Maintaining records sufficient to demonstrate compliance with the relocation and real property acquisition requirements. (To maintain complete records, the grantee 					
	will need to be copied on correspondence, etc., from subrecipients.)					
	Specific functions that subrecipients normally can be expected to perform:					
	 Identify occupants of the property when consideration of project proposal is initiat- ed (e.g., obtain a copy of "rent roll"). 					
	 Identify persons moving into the property after consideration of the project is ini- tiated. 					
	 Survey tenants to gather information on household size, income, housing needs, and preferences. [Grantee should explain in detail exactly what is expected of subrecipients, e.g., how to survey tenants and collect information on household size, income, etc.] Issue general information notice. 					

•	Coordinate	with	grantee	on	referrals	to	suitable	and	comparable	replacement
	housing and provide transportation to inspect the housing.									

- Identify suitable housing for the temporary relocation of persons not displaced.
- Issue timely Notices of Non-displacement.
- Coordinate with the grantee to permit the grantee to issue timely Notices of Eligibility for relocation assistance.
- Coordinate with the grantee to permit timely grantee processing of relocation claims.

[Grantee should supply information booklets, guide form general information notices, and guide form Notices of Eligibility and/or Non-displacement (if applicable) to the subrecipients and answer questions about the materials.]

Additional information on forms and amounts of assistance:

- Discussion of differences in assistance available under 104(d) versus URA: Section 104(d) assistance is similar to that under URA, although Section 104(d) also allows for relocation payments for security deposits and credit checks and provides for replacement housing payments for a longer time period (60 months versus 42 months under URA).
- Discussion of formulas to compute residential relocation assistance payments: moving and related expenses (fixed moving and dislocation allowance or actual moving expenses and related costs); replacement housing payments (URA formula versus Section 104(d) formula).
- Discussion of available Section 8 assistance and HOME tenant-based rental assistance.
- Presentation on specific requirements for temporary residential relocation: notice of non-displacement; definitions of suitable temporary housing; exceptions for owner-occupants.
- 12:00 noon 1:00 p.m. Lunch break

1:00 p.m. – 1:30 p.m. Exercise on temporary residential relocation

Exercise could involve presenting the participants with several brief hypothetical examples of temporary relocation, asking them to comment on process, range, and levels of assistance provided.

1:30 p.m. – 2:00 p.m. Presentation on procedures for residential displacement

Discussion of procedures, including informing occupants and manner of notice; advisory services to persons to be displaced; identification and referrals to comparable replacement housing; moving into replacement housing; processing claims and making payments; appeal procedures; and respective roles of grantee and subrecipient.

2:00 p.m. – 2:45 p.m. Exercise on residential displacement

Participants could be given a scenario involving probable displacement of residential property occupants and asked to describe the process that should be followed to ensure adequate replacement housing and the respective roles of the grantee and the subrecipient in that process. Participants also examine the long- and short-term costs of alternate approaches.

2:45 p.m. – 3:00 p.m. Break

3:00 p.m. – 3:30 p.m. Presentation on requirements and procedures for business relocation

Discussion of differences between residential and business relocation assistance under URA; differences between actual and fixed payments; business owner options to remain in business or go out of business, and the assistance available in each case; and limits to assistance in finding suitable replacement business locations.3:30 p.m. - 4:00 p.m.Exercise on business (nonresidential) relocation4:00 p.m. - 4:30 p.m.Exercise on business (nonresidential) relocation4:30 p.m. - 5:00 p.m.Summary of key points, additional questions & answers, and feedbackGrantee should close session by providing name and telephone number of grantee staff member(s) who will be responsible for providing assistance on relocation, property acquisition, and one-for-one housing replacement matters.

Online HUD Training and Handbook Resources

• URA the HUD Way

A web-based modular training course providing basic information and resources to HUD grantees and funding recipients on URA requirements.

• URA the HUD Way Resources

General URA Resources including:

- URA Statute (Law)
- 49 CFR 24 (URA Regulations)
- URA Fixed Residential Moving Cost Schedule
- CPD Notice 14-09 (MAP-21 Guidance)
- HUD Tenant Assistance, Relocation and Real Property Acquisition Handbook 1378 (Policy & Guidance)
- · HUD's Acquisition and Relocation Website
- Real Property Acquisition Process Flowchart
- Temporary Relocation
- URA the HUD Way Appeals Process
- URA the HUD Way Recordkeeping Checklist
- Multifamily Accelerated Processing (MAP) Guide 4430.G
- Section 414/Stafford Act—Additional Waivers
- Uniform Act Frequently Asked Questions