

St. Clair County
Intergovernmental Grants Department /
Community Development

Policy and Procedure
Manual for
Compliance Monitoring



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Introduction

The Community Development Group of the St. Clair County Intergovernmental Grants Department conducts program compliance monitoring to ensure adherence to established Policies & Procedures, Written Standards, and Federal Regulations set forth by the Department of Housing and Urban Development (HUD). HUD describes monitoring as an integral management control technique and a Government Accountability Office (GAO) function. This process allows reviewers to assess how projects implement these guidelines and identify areas requiring additional resources and training to comply with regulations, Policies & Procedures, Written Standards, and best practices.

Compliance monitoring is not merely an annual or periodic task but an ongoing process involving continuous communication and evaluation. The Community Development Group views monitoring as a collaborative effort with partner agencies, fostering positive growth within our community's response system related to capital improvements, new home construction, homebuyer assistance, and housing rehabilitation.

- **Continuum of Care (CoC)** programs supporting homelessness response systems
- **Community Development Block Grant (CDBG)** programs for community and economic development
- **Community Development Block Grant–Disaster Recovery (CDBG-DR)** programs for long-term disaster recovery
- **Community Development Block Grant–Coronavirus (CDBG-CV)** programs for pandemic response and recovery efforts
- **HOME Investment Partnerships Program (HOME)** for affordable housing development and rehabilitation
- **HOME-American Rescue Plan (HOME-ARP)** program for housing assistance and supportive services for qualifying populations

This policy and procedure manual provides comprehensive information for agencies to prepare for compliance monitoring. We strongly recommend reading this document in its entirety. The policies, procedures, and guidance outlined in this manual are designed to align with Policies and Procedures for CDBG Funds, HOME Funds, and HRC/CoC Funds, in addition to The Community Planning and Development (CPD) Program Monitoring Handbook 6509.2 REV-7 CHG 6, Code of Federal Regulations (eCFR) Title 24: Housing and Urban Development, and Internal Policies and Procedures for CDBG, CDBG-DR, CDBG-CV, HOME, HOME-ARP, and CoC/HRC funding streams.

Monitoring Regulatory Authority

- The Community Development Group of the St. Clair County Intergovernmental Grants Department Policies & Procedures [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)
- Electronic Code of Federal Regulations (eCFR), Title 24: Housing and Urban Development [eCFR :: Title 24 of the CFR -- Housing and Urban Development](#)

- U.S. Department of Housing and Urban Development CPD Monitoring Handbook (6509.2) [CPD Monitoring Handbook \(6509.2\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

Monitoring Objectives and Goals

The primary objective of monitoring is to ensure that program participants adhere to applicable federal, state, and local regulations, internal policies and procedures, and evidence-based practices. Monitoring also serves as a proactive tool to identify and prevent deficiencies, support continuous improvement, and design corrective actions that strengthen program performance.

The **Community Development Group** has established the following standard monitoring goals to guide its work across all HUD-funded programs, including **Continuum of Care (CoC)**, **Community Development Block Grant (CDBG)**, **CDBG–Disaster Recovery (CDBG-DR)**, **CDBG–Coronavirus (CDBG-CV)**, **The HOME Investment Partnerships American Rescue Plan Program (HOME ARP)**, and **HOME Investment Partnerships Program (HOME)**:

- 1. Enhance Regulatory Compliance**
Promote adherence with federal and local regulations, rules, and standards, and while encouraging the use of evidence-based practices.
- 2. Support Capacity Building**
Identify opportunities for training and resources that address both project-level and system-level needs.
- 3. Foster Collaborative Relationships**
Develop and maintain strong, transparent and supportive partnerships with subrecipients and funded entities to promote a shared accountability and community impact.

Specific Monitoring Objectives

The Community Development Group conducts monitoring to ensure that subrecipients and program partners are implementing federally funded programs in accordance with approved plans, agreements, and applicable regulations. Specific objectives include:

- 1. Activity Verification**
Confirm that subrecipients and program partners are carrying out activities as described in their approved scope of work and executed agreements.
- 2. Documentation Review**
Review records to ensure systems are in place to properly document the provision of services, client eligibility, and compliance with any other contractual and regulatory requirements.
- 3. Financial Compliance**
Ensure that expenditures of allocated funds are made in accordance with the terms of the agreement and applicable program regulations.

4. Timeliness of Implementation

Assess whether activities are being completed according to the timeline outlined in the agreement.

5. Cost Eligibility and Reasonableness

Confirm that costs charged to the project are eligible under applicable laws and HUD regulations and are reasonable considering the services or products delivered.

6. Program and Financial Controls

Ensure that subrecipients and program partners conduct their activities with adequate control over program and financial performance, minimizing opportunities for waste, mismanagement, fraud, and abuse.

7. Capacity Assessment

Assess whether the subrecipients and program partners have the capacity to carry out the approved project, as well as future grants for which it may apply.

8. Problem Identification and Resolution

Identify potential areas of noncompliance and assist the subrecipients and program partners in understanding and meeting applicable laws, regulations, and program requirements.

9. Assistance and Support

Assist subrecipients and program partners in resolving compliance problems through discussion, negotiation, and the provision of technical assistance and training.

10. Follow-up and Correction Action

Implement follow-up procedures to ensure that identified deficiencies are addressed and corrective actions are sustained.

11. Recordkeeping Compliance

Ensure that required records are maintained to demonstrate compliance with applicable federal, state, and local regulations.

Monitoring also serves as a platform to recognize subrecipients and program partners successful management, implementation, and evaluation techniques that can be replicated across other projects and agencies.

Monitoring Selection

All programs will be monitored routinely and continuously. In addition to ongoing oversight, targeted monitoring of specific subrecipients or projects is conducted based on a risk-based assessment and other strategic considerations. When selecting specific projects, subrecipients, and/or program partners for targeted monitoring, the Community Development Group prioritizes those that:

- Requested to be monitored
- Recently received a low score from the ranking and review committee or other evaluation processes for Coc
- Have not been monitored by HUD recently or the Community Development Group
- Have demonstrated compliance or performance problems

- Are new to **programs administered by the department**, including CDBG, CDBG-DR, CDBG-CV, CoC, HOME, HOME-ARP, or other locally funded initiatives
- Have experienced a turnover in key staff positions or a change in organization goals or direction
- Carry out high-risk activities, such as construction, rehabilitation, or financial assistance
- Undertake multiple projects or funding streams for the first time, especially those involving federal or state funds

This approach ensures that monitoring efforts are focused on areas where they are most needed, promoting compliance and continuous improvement.

Monitoring Components

Monitoring Approaches

The Community Development Group utilizes a variety of monitoring approaches to assess compliance, performance, and documentation across all programs—whether federally, state, or locally funded. The depth and location of monitoring activities are determined based on the type of project, risk level, and specific compliance areas under review.

On-Site Monitoring (OS):

This type of monitoring is conducted at the subrecipient or program partner’s geographic location. This approach allows for direct observation of operations, interviews with staff, and review of physical files and facilities.

Remote Monitoring (RM):

This monitoring is conducted off-site, typically at the Intergovernmental Grants Department. It involves analyzing information performance reports, audited financial statements, electronic databases, client files and other documentation. The primary difference between remote and on-site monitoring is the location and the reliance on submitted materials. All other monitoring protocols and policies remain the same.

Hybrid Monitoring (HM):

Hybrid monitoring combines both on-site and remote monitoring. Portions of the review may be conducted in person, while others are completed remotely. This approach is often used for complex projects or when logistical constraints exist.

Self-Monitoring (SM):

Recipients, subrecipients, and program partners should institute regular self-monitoring to check for compliance with all requirements. Self-monitoring should include monitoring for performance and assessing compliance with policies, including file reviews to verify that appropriate documentation is being maintained. Self-monitoring can identify potential issues and allow the grantee to make corrections proactively in advance of external monitoring.

For CoC programs, subrecipients and program partners are also expected to conduct regular self-monitoring to ensure compliance with all requirements, in addition to the formal monitoring

conducted by the Collaborative Applicant. When the County is the direct recipient of HUD funds—including CDBG, CDBG-DR, CDBG-CV, HOME, HOME-ARP—it implements a self-monitoring system to review program performance, compliance with policies, and documentation.

At the time of this policy's adoption, St. Clair County's CDBG, CDBG-CV, and CDBG-DR programs do not utilize subrecipients. All program activities are administered directly by the County and monitored through internal self-monitoring procedures. If subrecipients are engaged in the future, the IGD-CD will revise this Compliance Monitoring Policy to incorporate subrecipient monitoring procedures consistent with HUD guidance, to develop an annual monitoring plan, define roles and responsibilities, and establish protocols for conducting formal monitoring of subrecipient activities. This commitment ensures that the County remains compliant with HUD regulations and is prepared to implement appropriate oversight mechanisms should program delivery structures change.

This flexible framework ensures comprehensive evaluation while maintaining flexibility in the monitoring process. The depth and location of the monitoring will depend upon which compliance areas need to be reviewed.

Monitoring Methods

The Community Development Group employs a variety of monitoring methods to evaluate compliance, performance, and documentation across all programs administered by the department. These methods are selected based on the nature of the project, risk level, and available resources, and are applicable to both federally and locally funded initiatives.

Formal Monitoring

Formal monitoring is a planned and systematic process for observing and evaluating specific aspects of performance or compliance. This type of monitoring involves scheduled observations, data collection, and the use of standardized tools or checklists to ensure consistency and accuracy. The objective is to gather detailed information on the quality and effectiveness of the performance being monitored.

Review Monitoring

Review monitoring involves conducting unscheduled or periodic reviews to quickly assess performance or compliance. This type of monitoring is carried out by reviewing reports and management systems. These checks are conducted at irregular intervals and are designed to ensure that high standards are consistently maintained. Review monitoring helps identify issues that might not be apparent during formal monitoring and provides a snapshot of ongoing day-to-day operations.

Assessment Areas

Monitoring conducted by the Community Development Group focuses on several core components to evaluate compliance, performance, and documentation across all programs

administered by the department. These assessment areas apply to both federally funded and locally supported initiatives.

Policy and Procedure

The policy and procedure component involves examining the specific policies and procedures that subrecipients and program partners have established for the programs they manage. Monitoring will assess the language and structure of these documents to ensure it aligns with HUD's applicable regulations and verify that agency operations adhere to the implemented policies and procedures.

File and Record

The file and record monitoring component is designed to verify and document compliance and performance, including physical inspections if conducted on-site. Monitoring staff will use checklists to capture all relevant information and guide the monitoring review. File and record reviews will determine the accuracy of information using both automated and manual data and reports submitted by the subrecipient or program partner.

Programmatic

The programmatic monitoring component is a process used to ensure that services are delivered or performed as required by HUD and as outlined by subrecipient or program partner's agreement and approved scope of work. This type of monitoring involves reviewing and assessing documentation, data, and service delivery to verify compliance with programmatic requirements, adherence to applicable laws and regulations, and progress toward expected results and outcomes.

Collaborative Applicant Monitoring for CoC Programs

Monitoring Arrangements and Preparation

On-Site Monitoring (OS)

The Monitoring Staff will initiate contact with the agency to schedule the monitoring process. Each agency may undergo monitoring at least once annually.

Notification of the scheduled monitoring will be provided at least 60 days in advance. This notification will include a list of initial records to be reviewed. These records must be prepared for review by the time of the monitor's arrival and made available at the designated workspace for the monitor. Subrecipients and program partners are required to provide a comprehensive overview of the project, including its current status and any existing issues, prior to the commencement of the monitoring event.

Remote Monitoring (RM)

The Monitoring Staff may request that the subrecipients and program partners submit updated or subsequent documentation, reports, contract agreements, and other relevant materials. Additionally, subrecipients/ grantees may be asked to provide client identification numbers to facilitate the monitoring of files within appropriate reporting systems.

Monitoring Checklist

The questions contained within the Monitoring Checklist provide a standardized structure for monitoring compliance areas. The Checklist serves as a tool to ensure fair and consistent monitoring procedures. Its use guarantees the completeness and thoroughness of the monitoring process.

Additionally, the Checklist provides Monitoring Staff with the necessary information to prepare the monitoring report for correspondence upon completion of the monitoring event. It also supplies the documentation and information required to justify corrective actions and further monitoring if necessary.

Post Monitoring

Monitoring Report

Within sixty (60) days following the completion of the monitoring (whether on-site, remote, or hybrid), written correspondence detailing the results will be forwarded to the subrecipients/grantees. This correspondence will provide sufficient detail to clearly describe the areas covered and the basis for the conclusions. The monitoring report will include:

- The program, project, and/ or entity monitored.
- The dates of the monitoring.
- A comprehensive list of the program/project/activity areas reviewed.
- Monitoring conclusions.
- Clearly labeled discoveries, if applicable. Depending on the nature of the results, recommendations for resolution may be provided.
- Observations, if any, regarding the agency's operations.
- An offer of training and/ or resources, if needed.

Response to Monitoring Report

Within sixty (60) days of receiving the monitoring report, the grantee is required to submit a written response. This response should include:

- A detailed reply to each individual discovery, if applicable.
- Copies of any documentation supporting the response to the discoveries, demonstrating corrections or justifications.
- Provide all relevant documentation and background information to facilitate a comprehensive understanding of the issues.
- Collaborate to develop and implement a detailed plan to address the discoveries
- Establish a process for ongoing monitoring and feedback to ensure the effectiveness of the training and/ or resources provided.

Follow-Up on Monitoring Report

If the program participant has not responded within sixty-days (60) days following the date of the monitoring report, a letter will be sent to the program participant requesting the status of the corrective actions and warning of the possible consequences of non-compliance under the applicable program requirements.

In cases where the program participant remains unresponsive or uncooperative, the Board of Directors will internally determine and implement progressive sanctions.

Training and Resource Goals

One of the primary objectives of monitoring is to provide recommendations to support the growth and performance of projects. Recommendations options may include:

- Providing available CoC funded trainings
- Facilitating peer-to-peer learning opportunities
- Assisting with updating policies and procedures
- Offering consultations to answer questions and provide clarifying information
- Sharing resources such as guides, FAQs, templates, and other necessary materials

These activities are designed to enhance the effectiveness and compliance of projects.

Collaborative Approach and Problem-Solving Responses

The Community Development Group adopts a collaborative and supportive approach when working with agencies, recognizing that collaboration is the most effective way to achieve goals related to capital improvements, new home construction, homebuyer assistance, housing rehabilitation, and homeless services. In regard to CoC funded programs, there are instances where the actions of monitored agencies may necessitate appropriate and necessary problem-solving responses from the HAC Board of Directors. These instances include:

- A project exhibits a pattern of not engaging with the monitoring process, as demonstrated by multiple instances of not attending meetings, responding to communications, or submitting documents.
- A project does not engage in trainings, resources or improvement efforts, including failing to develop sufficient plans to improve based on monitoring results.
- Evidence of fraud or conflict of interest.

Any actions or consequences taken by the Community Development Group for other HUD funded projects in response to these instances will be appropriate to the specific case and will aim to ensure adherence to relevant rules, regulations, and performance standards.

Documentation of Monitoring Activity

All monitoring activities will be thoroughly documented in an administrative record. This includes using the monitoring checklist to record case numbers, statistics, and financial figures provided by

subrecipients. Additionally, the names and dates of policies and other documents reviewed will be noted. A comprehensive record of monitoring activities will be maintained, including but not limited to:

- Noting the actions taken during the monitoring process.
- Identifying the materials reviewed.
- Documenting conversations with agency staff.
- Photographing any properties or program sites inspected and recording observations.

It is crucial to identify the sources of information used to arrive at monitoring conclusions, especially if subrecipients dispute any findings.

Retention and Security of Monitoring Files

Files for each program monitoring event will be retained and securely stored at the Intergovernmental Grants Department office

Self-Monitoring for HUD-Funded Programs (CDBG, CDBG-DR, CDBG-CV, HOME, HOME-ARP)

Introduction to Self-Monitoring

St. Clair County Intergovernmental Grants Department serves as the umbrella agency for the Community Development Group, which is responsible for administering various grant programs related to capital improvements, new home construction, homebuyer assistance, and housing rehabilitation.

Self-monitoring plays a critical role in ensuring compliance with regulations and achieving optimal performance across HUD-funded programs, including the Community Development Block Grant (CDBG), CDBG–Disaster Recovery (CDBG-DR), CDBG–Coronavirus (CDBG-CV), the HOME Investment Partnerships Program (HOME), and HOME-American Rescue Plan (HOME-ARP).

When the County administers programs directly, without the use of subrecipients, it implements a self-monitoring approach. This allows the Community Development Group to regularly assess its operations, identify areas for improvement, and address deficiencies proactively, well before external monitoring or reviews take place. *At the time of this policy's adoption, program activities under St. Clair County's CDBG, CDBG-CV, and CDBG-DR grants are administered directly by the County. As such, internal self-monitoring procedures are used to assess compliance and performance. This policy will be updated to include formal subrecipient monitoring protocols aligned with HUD guidance should the County engage subrecipients in the future, ensuring readiness for evolving program delivery structures and continued regulatory compliance.*

The goal is to uphold the highest standards of compliance, efficiency, and effectiveness, ensuring all activities align with HUD's policies and the applicable regulations.

Roles and Responsibilities in Self-Monitoring

To maintain objectivity and ensure program staff are not monitoring their own work, St. Clair County IGD-CD has implemented a checks and balances system within its self-monitoring approach. Program-specific staff are responsible for regularly reviewing the programmatic aspects of their assigned activities. These reviews are frequently verified by a second staff member to ensure accuracy and reduce the risk of oversight.

The Compliance Monitor conducts both informal and formal monitoring at least annually, documenting the scope and results of each review. All monitoring documentation is submitted to the Program Coordinator, who authorizes the results and works alongside the Compliance Monitor to oversee follow-up actions and ensure that any identified issues are appropriately addressed.

Financial monitoring is conducted by the Fiscal Department, which reviews expenditures, drawdowns, and budget alignment to ensure compliance with applicable cost principles. All

financial monitoring procedures are outlined in the County's Financial and Risk Assessment Policies and Procedures.

Internal self-monitoring aligns with HUD's CPD Monitoring Handbook and applicable federal regulations. St. Clair County IGD-CD's goal is to maintain full compliance in preparation for external monitoring by HUD, other funding agencies, and external auditors.

Objectives of Self-Monitoring

Self-monitoring is a proactive internal review process used by St. Clair County Intergovernmental Grants Department, Community Development Group when programs are administered directly by the County rather than through subrecipients. Self-monitoring aims to:

- Ensure compliance with federal and local regulations, as well as HUD program requirements.
- Proactively detect and correct potential compliance issues.
- Enhance the performance and efficiency of program implementation.
- Identify training and resource needs to address areas of non-compliance or performance gaps

Key Areas for Self-Monitoring

When the County is directly implementing HUD-funded programs, the following key areas should be evaluated regularly:

- **Activities**
Confirm that activities are being carried out as outlined in the program's Action Plan, agreement or funding contract.
- **Eligibility and Documentation**
Ensure that eligibility is properly documented and that records demonstrate compliance income limits, property standards, and other program specific requirements.
- **Expenditures**
Review financial records to ensure expenditures are allowable, reasonable, and aligned with approved budgets and HUD cost principles (2 CFR Part 200).
- **Timeliness**
Monitor project timelines to ensure activities are progressing according to the schedule outlined in the agreement or Action Plan.
- **Policy and Procedures**
Review internal policies and procedures to ensure alignment with HUD regulations, verifying that operational procedures support compliance with federal rules and fund usage.
- **File and Record Maintenance**

Regularly review files and records to ensure that all required documentation is accurate, complete, and easily accessible. This includes reviewing contracts, eligibility documentation, client files, and financial records.

- **Programmatic Review**

Conduct periodic reviews of program activities to ensure they are executed according to the approved scope of work, confirming that services are delivered on time and in accordance with HUD agreements.

- **Financial Monitoring**

Confirm that costs are eligible, properly documented, and within budget. Review drawdowns in systems like IDIS (CDBG/HOME) or DRGR (CDBG-DR) for accuracy and timeliness.

- **Duplication of Benefits (DOB) Compliance (CDBG-DR, CDBG-CV)**

Monitor DOB compliance for a period that reflects the risk level of the activity and the likelihood of additional assistance being received. This period will be defined in the program's Monitoring Plan and may range from one to five years.

Self-Monitoring Procedures

Self-monitoring should be a continuous process, including:

- **Regular Review of Documentation**

Program staff will review financial records, contracts, client files, and project documentation at least quarterly to verify accuracy, completeness, and compliance with applicable regulations. This includes cross-checking expenditures against approved budgets, verifying eligibility documentation, and ensuring that all required forms and approvals are present. In addition, the Compliance Monitor will conduct an annual review of documentation to validate internal monitoring efforts and ensure consistency with HUD requirements.

- **Timely Reporting**

The Program Coordinator, Compliance Monitor and designated staff will maintain a reporting calendar to ensure all required HUD reports (e.g., QPRs, CAPERs, DRGR entries) are submitted on time. Reports will be reviewed internally prior to submission to confirm data accuracy and completeness.

- **Internal Monitoring**

Formal monitoring reviews will be conducted at least annually by the Compliance Monitor. These reviews will include desk audits of program files, financial records, contracts, client documentation, and performance data. The purpose is to verify compliance with HUD regulations, assess program effectiveness, and identify any discrepancies or areas for improvement. Results of the monitoring review will be documented in a formal report and shared with the Program Coordinator for follow-up.

- **Follow-Up on Corrective Actions**

When deficiencies are identified during internal monitoring or file reviews, a plan will be developed within 60 days. The plan will outline specific steps for resolution, assign responsible staff, and establish clear timelines for implementation. Progress will be tracked

monthly by the Compliance Monitor and Program Coordinator, with Executive Management engaged as needed for oversight or resource allocation.

- **Review of Contracts and Agreements**

Contracts and funding agreements will be reviewed annually to ensure compliance with performance timelines, deliverables, and allowable costs. The Program Coordinator, Fiscal Manager, Compliance Monitor, and other designated staff will verify that all contract terms are being met, including scope of work, budget adherence, and reporting requirements. Any necessary amendments will be processed in a timely manner to reflect changes in funding, timelines, or project scope.

- **Training and Resources**

Monitoring results may identify areas where additional training or resources are needed to improve compliance and program performance. When such needs are identified, the Program Coordinator, Compliance Monitor, Executive Management, and other designated staff will work collaboratively to address gaps in staff knowledge or procedural understanding. Training may include internal workshops, external webinars, updated guidance documents, or one-on-one coaching. Resource needs—such as revised templates, checklists, or software tools—will also be assessed and provided as necessary to support staff in meeting program requirements.

Continuous Improvement and Collaboration

Self-monitoring is not only about compliance but also about fostering an environment of continuous improvement. Program administrators should:

- Regularly engage with stakeholders and partners to ensure shared goals and understanding of compliance requirements.
- Collaborate with other agencies to identify best practices and resources that may be beneficial in addressing common challenges.
- Use self-monitoring outcomes to inform future program planning and strategy, ensuring long-term success.
- Regularly evaluate the results of self-monitoring to identify opportunities for improvement and refine program operations.
- When applicable, work with stakeholders or HUD representatives to receive feedback and enhance program performance.
- Ensure that all staff members are involved in self-monitoring activities and understand their role in maintaining compliance and improving program outcomes.

Documentation of Monitoring Activities

All monitoring activities are documented thoroughly to ensure transparency and accountability. This includes:

- **Monitoring Checklists:** Recording actions taken during the monitoring process.
- **Materials Reviewed:** Noting the policies, reports, and other documents examined as part of the monitoring process.

- **Staff Interactions:** Documenting all communications and discussions with agency staff.
- **Inspections and Observations:** Photographing properties or program sites and noting any significant observations made during on-site reviews.

Retention and Security of Monitoring Files

All monitoring files, including reports, documentation, and correspondence, are securely stored at the Intergovernmental Grants Department office. This ensures that program compliance records are maintained in accordance with federal requirements and are readily accessible for future reference if needed.

By consistently applying these self-monitoring practices, the St. Clair County Intergovernmental Grants Department's Community Development Group can ensure they meet the standards set by HUD for CDBG, CDBG-DR, CDBG-CV, HOME, ARP, HOME, and programs, while continuously improving service delivery and community impact.

Revision History

Event	Date
Created/ Adopted	December 2025
Adopted revisions	11/25/25
Adopted revisions	