

## **RESPONSIBILITIES BETWEEN GRANTEE/SUBRECIPIENT AND COMMERCE**

### **RESPONSIBILITIES OF THE GRANTEE**

1. Initiate and follow through on all communication with the CDBG Project Manager that involves grant contract, amendments and compliance areas.
2. Keep full set of original records onsite (city hall, courthouse, etc.), showing full compliance with CDBG requirements.
3. Develop familiarity with compliance areas, which will allow city to oversee subrecipient in these areas.
4. Serve as Responsible Entity and the federally-designated official on CDBG NEPA determinations.
5. Monitor at least quarterly that all compliance areas are being administered by the subrecipient.
6. Establish evaluation criteria for the subrecipient, and use these to determine if the subrecipient is fulfilling contractual obligations to the grantee. (Evaluation criteria will be based upon the actual contract terms.)
7. Serve as prime communication link between subrecipient and the Project Manager.
8. Provide maximum in-kind in the form of work hours, equipment, supplies and services to the subrecipient to help keep project administrative costs at a minimum.
9. Remember that the grantee that contracts with Commerce is wholly responsible for the CDBG compliance of the project. It is up to the grantee to work directly with the Project Manager to work through problems and assure compliance. The subrecipient may give the grantee advice or guidance, but only the grantee has the authority to direct and control the project.

### **SUBRECIPIENT RESPONSIBILITIES**

Sign a fully detailed professional services agreement or contract in which obligations and responsibilities are clearly outlined between the grantee and subrecipient. These obligations must reflect the requirements of CDBG, and must grant maximum power to the grantee.

1. Provide complete original documentation to the grantee for all processes involving the CDBG grant.
2. In general, communicate with the CDBG Project Manager through the grantee and not on behalf of the grantee.
3. Report to the grantee at least monthly.
4. Help ensure compliance with all CDBG requirements.
5. Comply fully with all terms of the professional services or subrecipient agreement.

### **THE CDBG PROJECT MANAGER'S RESPONSIBILITIES**

1. Manage the original contract and subsequent amendments.
2. Provide the grantee with training and technical assistance on federal requirements.
3. Monitor the grantee's compliance with CDBG requirements.
4. At the grantee's request, assist subrecipient in understanding and following through on compliance areas, monitoring requirements, etc.