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To: CSBG Eligible Entities **Program Guidance: CSBG-2021-01**  
From: Community Programs Division  
Release Date: April 12, 2021  
Effective Dates: March 6, 2020 through December 31, 2021  
**Subject: CSBG CAR Monitoring during the Pandemic**

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Beginning March 6, 2020 the following IHCD guidance is in effect and temporarily modifies the IHCD manual and CAR tool.

### **CSBG CAR Monitoring during the Pandemic**

The CSBG Comprehensive Administrative Review, required for each subgrantee agency at least once every 3 years, will continue to take place according to schedule throughout the pandemic.

However, during the effective dates of this guidance, IHCD will **not** put an agency on a QIP or MQIP based on their CAR Review score, but instead will **only** place an agency on an improvement plan if they are found to have significant ongoing fiscal or board governance issues that may not be easily corrected. This will ensure that the immediate agency focus is on assisting the community by providing necessary services to their low-income customers.

During the pandemic, the following additional considerations are in effect:

- Subgrantees will be given as much notice as possible prior to their CAR monitoring date. In January FY2020 and FY2021 each agency monitored will be provided their tentative scheduled monitoring dates for the upcoming year so additional planning and preparation may begin. Each agency will be provided at least 45 days' notice or more of their scheduled monitoring.
- Onsite monitoring will not take place until after IHCD staff are cleared to travel. During this timeframe IHCD will rely heavily on a desktop monitoring format.
  - IHCD added a jotform questionnaire to facilitate our understanding of how each agency meets the monitoring requirements. The questionnaire allows us the opportunity to get answers to the many questions that were previously asked while onsite. The advantage is that you now have over thirty days to provide an answer to these questions.
  - IHCD will use Microsoft Teams to conduct most meetings such as the entrance conference as well as staff and governing board interviews in order to allow for staff working in multiple locations to actively participate. Furthermore, the official



monitoring notice will detail what staff are needed to be available for interviews and on which days to allow them to maximize their work load.

- After travel may resume, IHCDA will schedule a one (1) full onsite day at the subgrantee location for all agencies where the onsite visit was not able to be completed at the time of the original monitoring. This reduces the traditional three-day monitoring visit and frees up staff to focus on other important agency business.
- While QIPs will not be required for subgrantees unless they have significant ongoing fiscal or board governance issues, IHCDA will still discuss all CAR monitoring results with subgrantee agencies. This will include providing a full final report and performance score, and pointing out any areas of concern.
  - The agency is still expected to provide a Required Action Plan (RAP) indicating how they will work towards improvement between now and the next time they are monitored.
  - Like every other monitoring period, IHCDA will not check that required action steps are completed until the next monitoring period (2023-2025). Agencies will be expected to complete action steps outlined in their RAP and may lose points on the next monitoring review) if they fail to do so. The timeframe for submitting the Required Action Plan has been increased from thirty (30) to sixty (60) calendar days.