

HOUSTON REGIONAL HIV/AIDS RESOURCE GROUP, INC.  
POLICY AND PROCEDURE  
FINANCE DEPARTMENT

FIN-23 SANCTIONS

Effective April 2006



As an administrative agency, The Resource Group (“TRG”) does not offer direct client services as provided for under various grant agreements it administers. To deliver these direct client services, TRG enters a contractual arrangement with agencies (“subgrantees”) that provide direct client services. Under its grant agreements, TRG is directly responsible for monitoring the financial and programmatic performance of all subgrantees to ensure subgrantees are in compliances with applicable provisions of OMB circulars and grant agreements.

Should TRG determine that a subgrantees is not performing according to the agreed upon terms and/or provisions of the grant agreements, then TRG should and will place subgrantees under sanctions. The procedures for placing a subgrantees under sanction are as follows:

- 1) Identify the noncompliance problem.
- 2) Attempt to resolve the noncompliance problem informally either by email or telephone.
- 3) If noncompliance problem persists, issue a formal sanction letter (word format provided)/email.
- 4) Copy of the letter is to be sent Finance and Programmatic Departments and/or included in email.
- 5) Once a subgrantees is placed on sanctions due to noncompliance, TRG’s financial department will temporarily hold all payments due the subgrantees.
- 6) Once subgrantees corrects the noncompliance problem, a letter/email should be sent to the subgrantees indicating that sanctions have been removed (a copy of this letter/email should be sent to Finance and Programmatic departments of the agency). Upon notification, TRG’s financial department will release all holds on reimbursement checks.
- 7) If the noncompliance problem persists, then the matter is escalated to TRG’s management/ED for further resolution/ and on sanctions and possible termination of a grants.