

## Closeout: Will You Be Ready?

2018 CDBG-DR Problem Solving Clinic
Atlanta, GA | December 12-14, 2018

#### Welcome & Speakers

- Session Objectives
  - Provide guidance on how to prepare for closeout and where to find further guidance
  - When CDBG-DR grants are ready for closeout and why it is important
- Speaker
  - Kevin O'Neill, HUD
  - Adriane Burgess, HUD



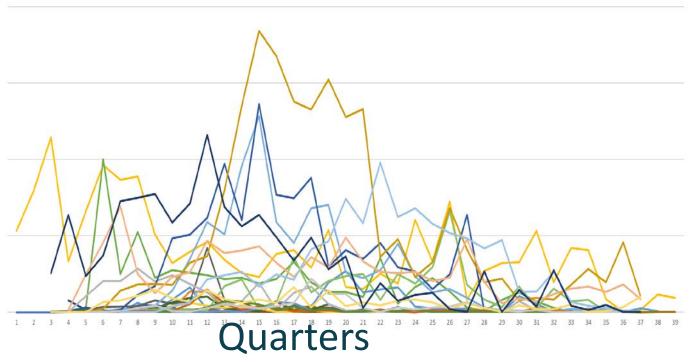
# **DR Grant Closeout Overview**



#### DR Grant Closeout...Today's Discussion

- Grant Closeout Trends
- Assessment Is grant ready to close?
- What can you do to prepare?

#### 2008 IKE & MWF Quarterly Spending



Each Line is a Grant
Omitted 4 largest grants



# What's the Big Deal? Why push for closeout after 8 years?

- Extending administration of a grant beyond 8 years is often inefficient
- Finding eligible activities (Tie-Back) is increasingly difficult
- Congress starts questioning the need for funding
- Institutional memory is lost due to increased staff turn-over

#### **Grant Closeout Requirements**

- All Federal Grants: 2 CFR 200 Subpart F
- HUD Grants: 24 CFR 570.509
- CPD Grants: CPD Closeout Notice 14-02
- DRSI: 2018 Closeout Guidance



#### Assessing the DR Grant

- What makes a DR Grant appear to be: Ready for Closeout Consideration?
  - Financial Status of Grant
    - Grant is at least 90% drawn, and/or
    - Grantee hasn't drawn funds "in a while"
  - Status of Activities
    - Most Activities have a status of "Complete"
  - Performance of Grant
    - Grantee has reported significant Actual Accomplishments in most activities



#### **DRSI** Assumptions

- Grant has been monitored.
- Grantee has "finished" recovery under this grant.
- DRGR Action Plan/QPR are in good condition.
  - Activities are properly categorized (Type & Status)
  - National Objectives are correct/supported
  - All financial "caps" and "goals" have been met
  - Accomplishments have been properly reported
  - Grantee expenditures are fully reported

#### DRSI Assumptions (continued)

- All Financial transactions are complete
  - Grantee does not intend to draw any more
  - All drawn funds have been expended by grantee (It's ok if some grant funds are repaid or left behind)
- No outstanding audit issues/corrective actions
  - HUD Audits
  - OIG Audits
  - Single Audits

#### What can you do to prepare?

- Communicate with CPD Rep/Specialist
  - Let them know when you are approaching "the beginning of the end"!
- Report data on programs as they close
  - Report Actual Accomplishments
  - Update Activity Status
  - Manage Remaining balances of funds (if possible)
- Check DRGR Data
  - Run the Closeout Reports and check your data



#### Key Points to Continue Progression towards Closeout

- Conduct early monitorings with subrecipients
- Provide additional Technical Assistance (TA) for subrecipients when...
  - Issues/concerns are identified
  - Delays in progression of construction of an activity/project
  - Significant/extended reduction in overall expenditures
- Assess overall expenditures by project/activity, program and grant
- Review and organize applicant/beneficiary files (checklists)

### Key Points to Continue Progression towards Closeout (continued)

- Review DRGR Reports and Flags (compare with your QPRs)
- Communicate with your subrecipients/partners to stay updated on real-time status of programs and projects
  - Communicate with HUD regarding any foreseen/unforeseen issues
- Review expenditure deadlines early to determine if time extension is needed
- Review HUD, HUD OIG and Single audit Findings and/or Concerns
- Maintain persistence in overall progression towards completion of projects/activities and programs which will lead to a timely closeout



#### What happens after closeout?

#### Be sure you have planned for:

- Compliance Oversight after closeout
  - Who will do it?
  - How will oversight efforts be funded?
  - What happens if ineligible costs are found later on?
- Program Income generated after closeout
  - Where will it go?
  - Be sure it is only used for eligible expenditures
- Record Retention Begins!
  - The date of the Closeout Agreement from HUD marks the beginning of the Record Retention inform any subrecipients and/or partners



### Questions

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