



U.S. Department of Housing and Urban Development

Managing and Improving Performance of Subrecipients

2021 CDBG-DR & CDBG-MIT Virtual Training Series



Introduction

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Managing and Improving Performance of Subrecipients/Subgrantees



2021 CDBG-DR & CDBG-MIT Virtual Training Series

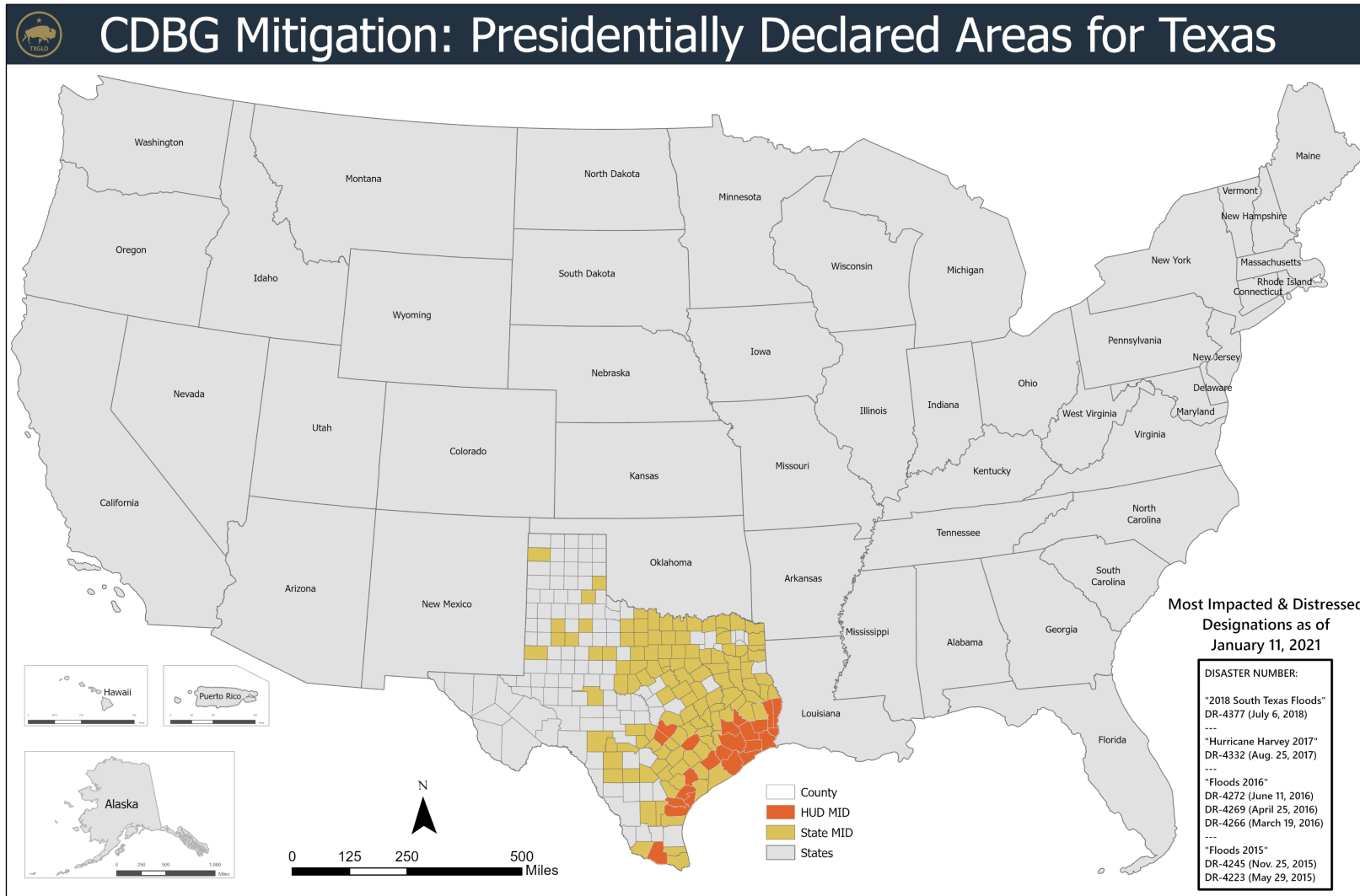
Texas Supplemental CDBG Allocations

<u>Award</u>	<u>Allocation</u>	<u>Balance</u>
Hurricane Rita	\$ 74,523,000	\$ -
Hurricane Rita	\$ 428,671,849	\$ -
Hurricane Ike	\$ 3,113,472,856	\$ 203,644,085
Wildfire 1&2	\$ 31,319,686	\$ 2,373,085
2015 Floods	\$ 74,568,000	\$ 42,893,341
2016 Floods	\$ 238,895,000	\$ 194,529,322
Hurricane Harvey	\$ 5,734,190,000	\$ 4,704,378,519
CDBG-MIT	\$ 4,301,841,000	\$ 4,296,758,341
2018 Floods	\$ 72,913,000	\$ 72,913,000
2019 Events	\$ 227,483,000	\$ 227,483,000
	\$ 14,297,877,391	\$ 9,744,972,693



2021 CDBG-DR & CDBG-MIT Virtual Training Series

Texas Impact Areas



Pre Action Plan – Program Design

- Determine what needs your State has for recovery
- Create programs to meet those needs
- Decide who can accomplish those tasks
- Determine who is best suited to complete each activity
 - the State
 - State Run with vendor support
 - Subrecipients
 - Partners



Action Plan Language

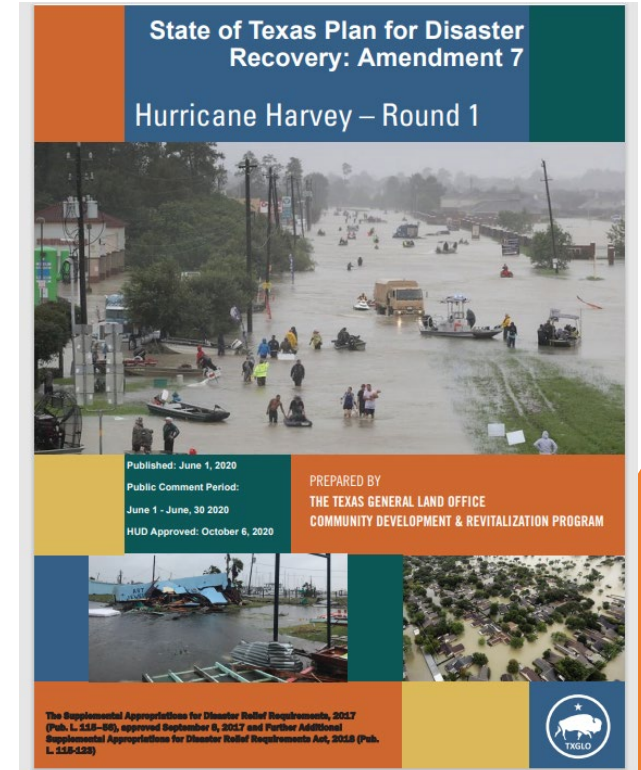
The Action Plan should define who will implement the programs, eligible participants, selection process, eligible and ineligible uses, maximum and minimum amounts, national objective, and expected performance.

Considerations:

- regulatory requirements, state and local law, funds available
- capability and capacity (you, partners, subrecipients)
- timeline



2021 CDBG-DR & CDBG-MIT Virtual Training Series



Guidelines, Manuals, SOPs, Forms, Reports

The more you can standardize the better.

Texas General Land Office CDBG-MIT Competition Application Guide

KNOW BEFORE YOU APPEAL

OVERVIEW

The Texas General Land Office Homeowner Assistance Program provides applicants with an opportunity to appeal program decisions. You are eligible to appeal only after you have received an official determination and were denied an appeal through a regional application coordinator.

TAKE NOTE

- A full file review by a GLO customer relations team member is conducted on an appeal, which may result in a change to your eligibility status.
- The customer relations team only applies current program policies and cannot reach outside of those parameters to make a decision.
- Applicants must have made an appeal at the local level prior to submitting to the GLO for appeal consideration.

PREPARING FOR YOUR APPEAL

As the applicant, it is your responsibility to support your case. This means providing all supporting documentation at the time the appeal is submitted, and ensuring the GLO customer relations team has everything needed in order to do a thorough review. The customer relations team is not responsible for collecting or requesting missing or additional information.

The following are examples of potential denials and corresponding reasons:

REASON	EXAMPLES
Program Eligibility	Ownership, occupancy, proof of damage, flood insurance non-compliance
Grant Calculation	Low to moderate income (LMI) status (income/household size, exceeds 120% LMI cap), escrow/homeowner responsibility
Repair/Reimbursement Estimate	Estimated cost of repairs, scope of work, reimbursement scope of work
Duplication of Benefits	SBA, FEMA, private insurance, NFIP, other DOB funds, receipt review
File Closure	Intelligible prior to application submission, intelligible due to non-responses

You may appeal a denial decision made by the local applicant coordinator within 10 days of the decision documented by the certified mail delivery date. If the appeal is denied at the regional level, you may submit an appeal within 10 days of the denial to the GLO.

PROCESS OVERVIEW

1. Applicant receives local determination of non-eligibility status
2. Applicant files appeal locally within 10 days of denial
3. Applicant receives local denial of requested appeal
4. Applicant has 10 days to submit an appeal with the GLO
5. The GLO will acknowledge receipt of appeal within 3-5 days
6. The GLO will review appeal and will provide a response within 10 days

QUESTIONS?

<https://recovery.texas.gov/help/> | 1-844-833-8337 | cd@recovery.texas.gov

Headquarters and Office Locations for the Housing Recovery Program are located throughout the state.

HOMEOWNER ASSISTANCE PROGRAM

APPLICANT DOCUMENT CHECKLIST

The Homeowner Assistance Program application period closed on December 31, 2019.

- VALID PHOTO I.D. FOR APPLICANT**
 - Driver License
 - State-issued Identification Card
- INCOME INFORMATION FOR ALL ADULT HOUSEHOLD MEMBERS (18+)**
 - Last 12 months (12 months of pay stubs, OR signed statement from employer stating wage and frequency of payment)
 - Benefits: social security or disability, unemployment, TANF, pension or annuity - income list of benefits should include benefit amount
- PROOF OF OWNERSHIP (1 of the following)**
 - Warranty deed
 - Property tax records that match the deed (deed history and payment on the land and structure)
 - For single-unit:
 - 99-year leasehold interest as owner
 - LEO certificate
 - Grant under title/leasehold/tenancy
 - Proof of mortgage
 - Color of title
- PROOF OF PRIMARY RESIDENCY/OCCUPANCY (1 of the following)**
 - Unexpired tax lien from the 2017 tax records (OR documentation from the month preceding to the month of the event for which the homeowner is applying for assistance. The applicant or co-applicant name and address must match the information on the application)
 - Utility bill (electric, phone, water, etc.)
 - Vote registration card
 - Credit card statement
 - Homeowner insurance policy (declaration page)
- PROOF OF CHILD SUPPORT PAYMENT FOR ALL ADULT HOUSEHOLD MEMBERS (18+)**
 - Documentation of current child support payments
 - Documentation of payment plan
- DISASTER ASSISTANCE PREVIOUSLY RECEIVED**
 - If a homeowner received federal-related assistance for damage from the event, they are required to provide documentation and information about the amount received, however name, damaged residential address, and the use of those funds.
 - Typical sources include:
 - FEMA Disaster Letter
 - SBA Disaster Letter
 - Insurance claim letter or copy of the Claim Summary outlining settlement payments to FEMA/SBA
 - If you own a 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, 10th, 11th, 12th, 13th, 14th, 15th, 16th, 17th, 18th, 19th, 20th, 21st, 22nd, 23rd, 24th, 25th, 26th, 27th, 28th, 29th, 30th, 31st, 32nd, 33rd, 34th, 35th, 36th, 37th, 38th, 39th, 40th, 41st, 42nd, 43rd, 44th, 45th, 46th, 47th, 48th, 49th, 50th, 51st, 52nd, 53rd, 54th, 55th, 56th, 57th, 58th, 59th, 60th, 61st, 62nd, 63rd, 64th, 65th, 66th, 67th, 68th, 69th, 70th, 71st, 72nd, 73rd, 74th, 75th, 76th, 77th, 78th, 79th, 80th, 81st, 82nd, 83rd, 84th, 85th, 86th, 87th, 88th, 89th, 90th, 91st, 92nd, 93rd, 94th, 95th, 96th, 97th, 98th, 99th, 100th, 101st, 102nd, 103rd, 104th, 105th, 106th, 107th, 108th, 109th, 110th, 111th, 112th, 113th, 114th, 115th, 116th, 117th, 118th, 119th, 120th, 121st, 122nd, 123rd, 124th, 125th, 126th, 127th, 128th, 129th, 130th, 131st, 132nd, 133rd, 134th, 135th, 136th, 137th, 138th, 139th, 140th, 141st, 142nd, 143rd, 144th, 145th, 146th, 147th, 148th, 149th, 150th, 151st, 152nd, 153rd, 154th, 155th, 156th, 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Subrecipient Selection - Capacity

- Direct allocations, competitions, MOUs
- What staffing is available?
- What controls do they have in place?
- Do they have CDBG-DR experience?
- How have they performed on previous grants?
- Will they manage directly or use vendors?

The HUD Financial Management and Grant Compliance certification checklist may be helpful



Contracting



While we all understand what we want to happen in our Subrecipient relationships; if it isn't written down you likely can't enforce it if you must.

- Incorporate everything by reference – Federal Registers, Action Plans, guidelines, manuals, all applicable federal state and local law, and anything that may become pertinent. “Subrecipient is deemed to have read and understood, and shall abide by...”
- **Always give yourself an out; or 5.** “all obligations of the GLO hereunder are subject to the availability of state funds. If such funds are not appropriated or become unavailable, the GLO may terminate this Contract” & “The GLO may terminate this Contract by giving written notice specifying a termination date at least thirty (30) days after the date of the notice”



Contracting – cont.

- Require expenditure and performance benchmarks
- Reimbursement requests should be submitted timely “The GLO must receive a reimbursement request for an incurred expense not later than 120 days from the date the Subrecipient incurs the expense”
- Regularly scheduled reporting is a must.
- Understand your contract terms

“All funds disbursed under this Contract are subject to recapture and repayment for non-compliance.”

Program Benchmark	Deadline
15% of Program funds drawn by Subrecipient	Q2 2021
50% of Program funds drawn by Subrecipient	Q4 2021
75% of Program funds drawn by Subrecipient	Q2 2022
95% of Program funds drawn by Subrecipient	Q4 2022
95% of Program funds drawn by Subrecipient	Q2 2023
95% of Program funds drawn by Subrecipient	Q4 2023
95% of Program funds drawn by Subrecipient	Q2 2024
100% of Program funds drawn by Subrecipient	At Project Closeout



Implementation

- Hire an amazing staff!
- Set Expectations
- Communicate often and frequently with Subrecipients
- Provide Technical Assistance when it is needed
- Simplify anything you can; if HUD doesn't make you do it, do you really need to?
- Be consistent and enforce program and contract terms
- Everything is not an emergency; fully vetting and documenting decisions are worth it in the long run
- Be flexible; you cannot make this stuff up



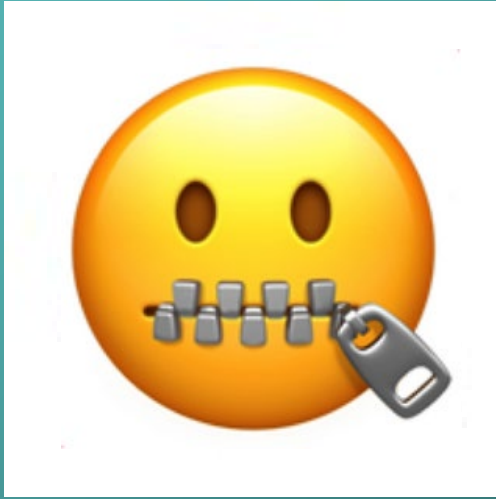
Broad tips

- Prepositioned vendors
- Do not reinvent the wheel
- Remember you are the Grantee
- Get your team the tools they need
 - Systems
 - Training
 - Coworkers
- Back up your team
- Celebrate accomplishments

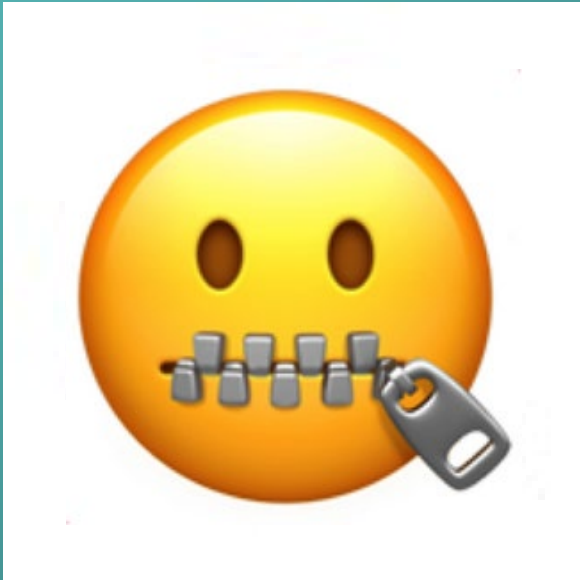


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Politics



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Q & A



2021 CDBG-DR & CDBG-MIT Virtual Training Series

Resources

- **HUD Exchange CDBG-DR page:**
 - <https://www.hudexchange.info/programs/cdbg-dr/>
- **HUD Exchange CDBG-MIT page:**
 - <https://www.hudexchange.info/programs/cdbg-mit/>
- **Texas General Land Office site:** <https://recovery.texas.gov/>
 - **Know Before You Appeal:** <https://recovery.texas.gov/files/programs/hap/hap-know-before-you-appeal.pdf>
 - **CDBG-MIT Competition Application Guide:** https://recovery.texas.gov/files/resources/mitigation/cdbg-mit_comp_app_guide_2020.pdf





**THANK
YOU**

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