

Emergency Housing Vouchers: Office Hours

This resource is prepared by technical assistance providers and intended only to provide guidance. The contents of this presentation, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This presentation is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.





EHV Office Hours

July 27, 2021

Audience: Public Housing Agencies and PHA Software Vendors

Purpose: Share information and provide an opportunity to ask EHV-related questions to HUD

Today's Focus: EHV Reporting, Part 1 of 2

If you're experiencing homelessness and in need of assistance:

<https://www.hudexchange.info/housing-and-homeless-assistance/homeless-help/>

Office Hours Logistics

- This session is being recorded. Recording will be shared at <https://www.hud.gov/ehv>
- All participants are muted. If you are having trouble connecting your computer audio, you can call in using the following information:
 - +1 646 558 8656
 - Webinar ID: 998 7192 2141
 - Passcode: 110590
- Please submit your questions in the Q&A box
- If you are having technical issues, please use the Q&A box



Speakers & Resource Advisors

Department of Housing and Urban Development

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 - Bob Boepple
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Agenda

- I. Review of EHV Administrative and Service Fees
- II. EHV Accounting
- III. Upcoming VMS Updates
- IV. Records Retention Requirements
- V. Preview of the Upcoming Financial Reporting Notice
- VI. Frequently Asked Questions

EHV Administrative Fees

| Fee Type | Calculation |
|------------------------------------|---|
| Preliminary Fee | PHAs will be awarded <u>\$400</u> per allocated EHV. |
| Issuing Action Fee | PHA will earn <u>\$100</u> once the voucher is initially leased, if the PHA reported the voucher issuance date in within 14 days of the later of the effective date of the family's voucher or when the system becomes available for reporting. |
| Placement Fees | <ul style="list-style-type: none">• <u>\$500</u> for each EHV family placed under a HAP contract within 4 months of effective date of the ACC funding (beginning on 7/1/2021).• <u>\$250</u> for each EHV family placed under a HAP within 6 months after the effective date of the ACC funding (beginning on 7/1/2021). |
| Ongoing Administrative Fees | Full Column A Admin Fee Amount for all leased units. |

How can EHV Administrative Fees be used?

1. For costs associated with administering the EHV program. (i.e., PHA staff, equipment)
2. For EHV Service Fee activities.

PHAs may not use EHV Administrative Fees to support other programs or activities.

Notice PIH 2021-20

Issued on June 30, 2021, this notice revises guidance from the EHV Operating Notice, and instructs PHAs to reporting HUD's Information Management System/Public Housing Information Center (IMS/PIC) system.

- PHAs must use program code “EHV” on the HUD-50058 or HUD-50058 MTW.
- Tied Issuance Fee (\$100) to IMS/PIC reporting. 50058 must be reported within 14 days of issuance, and subsequently leased.
- Tied Placement Fees (\$500 or \$250) to IMS/PIC reporting.
- Tied On-Going Administrative Fees to IMS/PIC reporting (after 3 months).

*HUD is working on reports that will allow PHAs to track their data.

****HUD is also working on an extension for business system updates.**

EHV Service Fees

PHAs will receive \$3,500 per EHV award for EHV Service Fees

- The fee is not tied to a specified household;
- PHAs received 50% of their EHV award in June. Additional 25% once 25% is reported expended in VMS, and the remaining 25% once 50% is reported expended. The PHA may request expedited disbursement by contacting their Financial Analyst at the Financial Management Center.

How can Service Fees be used?

- Housing search assistance;
- Security deposits, utility deposits, application fees;
- Landlord recruitment, incentives and retention payments;
- Moving expenses;
- Tenant readiness services;
- Essential household items;
- Renter's insurance (if required by the lease).

See recording of EHV Office Hours call from June 29th for more details on Service Fees at www.hud.gov/ehv

What if the COC is doing some of the EHV Administrative activities?

- The PHA can contract for EHV administrative functions/services.
- A PHA could establish a contract with any third party (including a COC) to pay for billable services.
 - The cost must reflect actual program administrative costs;
 - PHA would reimburse **after** services are provided. (PHA can't advance funds before services);
 - Recommend that the COC bill for services and PHA retain bills as an administrative record; and
 - Costs must be reasonable (Reasonableness of expenditures outlined in 2 CFR 200).
- PHA must remain in compliance with its procurement policy.
 - If there are other entities that may want to provide the services, they may want to consider a Request for Proposals (RFP);
 - Depending on the PHA's procurement policy, this might qualify as an Intergovernmental Agreement, sole source/emergency action, or a micro purchase;
 - PHA must follow any other local or state requirements; and
 - PHA needs to document the decision, and how they determined that the cost was reasonable.

EHV Accounting: Cost Allocation

- Many EHV programs are relatively small when compared to the PHA's own HCV program. Therefore, it is likely that many of the PHA staff assigned to support the EHV program, will also have non-EHV duties also assigned to them. For example, staff working on EHV may also be working in the PHA's HCV program (i.e., waitlist, (re-)certification, or inspection functions) or may be part of the PHA's central administrative area, such as the Executive Director, accounting, etc.
- As required under 2 CFR 200.400 – 476, only reasonable costs can be charged to a federal program, which includes both direct costs and indirect costs. Indirect costs must be reported in the EHV program and are normally determined through the PHA's cost allocation plan.
- PHAs should review and update their costs allocation plan as necessary to properly account and report costs related to the EHV program (Appendix V to 2 CFR Part 200 - State/Local Governmentwide Central Service Cost Allocation Plans and Appendix VII to 2 CFR Part 200 - States and Local Government and Indian Tribe Indirect Cost Proposals).

EHV Accounting: Cost Allocation

- PHAs that operate using HUD's asset management central office cost center (COCC) concept are permitted to charge the EHV program fees, as will be described in Section 6i of the Reporting Notice, to recover its central office costs.
- COCC defined costs, such as accounting and human resources for EHV would continue to be a cost of the COCC as per PIH Notice 2007-9 Supplement to the Financial Management Handbook Office of Public and Indian Housing (PIH) Revised April 2007 – Chapter 7 and funded through allowed fees.

EHV Accounting: Reporting

- PHAs may not transfer the EHV fees into the HCV (or other) program(s) as this accounting would result in an overstatement of the HCV program administrative expenses and the actual costs of the HCV and EHV program would be co-mingled in the HCV accounting records.
- **PHAs must account for both the EHV and HCV separately under the EHV and HCV program.**

Required PHA Level Accounting

- PHA must maintain complete and accurate accounts and other records for the EHV program and provide HUD and the Comptroller General of the United States full and free access to all accounts and records that are pertinent the administration of the EHV in accordance with the HCV program requirements at 24 CFR 982.158.
- EHV program rules and reporting requirements of VMS will require the PHA to keep a lower level of accounting and reporting records than required for FDS reporting. Besides HAP funding and expense information, PHAs will need to individually track each of the four different fee types received and the amount of expense incurred by that fee type and how much of the fee is unspent. For the service fee, more detailed accounting and reporting information is required. Specifically, PHAs are required to account and report how the Service Fee was used under any one of the classifications listed and defined in PIH Notice 2021-15:
 - Housing Search Assistance Expenses,
 - Security/Utility Deposit/Rental Application /Holding Fee expenses,
 - Owner Incentive Expenses,
 - Other Expenses

EHV VMS Fields

- Per [PIH Notice 2021-15](#), HUD will modify VMS to track the following data points monthly for EHV's from participating PHAs, including MTWs:

- **Emergency Housing Vouchers— Leasing**
- **Emergency Housing Vouchers - HAP Expenses**
- **Emergency Housing Vouchers – Preliminary Fee Expenses**
- **Emergency Housing Vouchers—Placement/Issuance Reporting Fee Expenses**
- **Emergency Housing Vouchers—Ongoing Administrative Fee Expenses**
- **Emergency Housing Vouchers – Services Fee – Housing Search Assistance Expenses**
- **Emergency Housing Vouchers- Services Fee – Security/Utility Deposit/Rental Application/Holding Fee Expenses**
- **Emergency Housing Vouchers -Services Fee -Owner Incentive Expenses**
- **Emergency Housing Vouchers – Services Fee – Other Expenses**
- **Emergency Housing Vouchers - Number of New Vouchers Issued but Not Under HAP Contract as of the Last Day of the Month**
- **Emergency Housing Vouchers - HAP Expenses After the First of the Month**
- **Emergency Housing - FSS Escrow Deposits**
- **Emergency Housing Vouchers - FSS Escrow Forfeitures This Month**
- **Emergency Housing Vouchers - Fraud Recovery Total Collected This Month**
- **Emergency Housing Vouchers - Unrestricted Net Position Funds (UNP) as of the Last Day of the Month**
- **Emergency Housing Vouchers - Restricted Net Position Funds (RNP) as of the Last Day of the Month**
- **Emergency Housing Vouchers - Cash/Investment as of the Last Day of the Month**

} Report expenditure of Admin Fees by award type.

} Report expenditure of Service Fees by use category.

VMS Update

- HUD is in the process of updating VMS to include EHV reporting fields
- Release includes new fields and is scheduled for Friday, July 30th
- PHAs will receive confirmation of release early next week and will be provided links to updated VMS User's Manual and Quick Reference Guide
- New fields will be available for July VMS reporting (cycle opens as normal on August 4th)
- HUD intends on issuing another reporting PIH Notice in August

Record Retention Requirements

- OMB regulation at 2 CFR 200.334 provides general record retention requirements.
- OMB requires that records pertinent to a federal award must be retained for a period of at least three years from the date of submission of the final expenditure report.
- 2 CFR 200.334(b) allows Federal agencies to extend the record-retention period for non-Federal entities (e.g., PHAs) if the extension is made in writing.
- HUD reserves the right to extend the record-retention period beyond three fiscal years and will notify PHAs in writing if and when such an extension is warranted.

Financial Reporting Notice Update

- HUD is drafting a financial reporting notice that covers VMS and FDS requirements for the EHV program.
- This notice is expected to be published in August.
- Based on discussions with the PHA software vendor community, HUD is changing the criteria for qualifying to earn the Issuance Fee of \$100. HUD is giving software vendors some additional time to incorporate the use of the new EHV code in the HUD-50058 and HUD-50058 MTW submissions into HUD's IMS/PIC system.



[Home](#) / [Emergency Housing Vouchers](#)

Need Housing?

Contact your local [Continuum of Care \(CoC\)](#)

Service Providers

[List of EHV Awardees \(MS EXCEL\)](#) Updated
6/22/2021

[Find Your Local Public Housing Agency
\(PHA\)](#)

[Administration for Children and Families
Contacts \(MS EXCEL\)](#)

Policy Notices

[PIH 2021-15: EHV Operating Requirements](#)
Published 5/5/2021

[PIH 2021-20: EHV Household Reporting
Requirements](#) Published 6/30/2021

FAQs

[EHV FAQs \(Published 7/13/2021\)](#)

EMERGENCY HOUSING VOUCHERS



Check out the latest FAQs here

The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, HUD is providing 70,000 housing choice vouchers to local Public Housing Authorities (PHAs) in order to assist individuals and families who are:

- Homeless,
- At risk of homelessness,

Q&A

Q: Can I request an increase for PUC? If so, to whom should it be submitted?

A: Yes. PIH Notice 2021-15, Section 7a states: “The initial funding increment for the EHV allocation will be based on the PHA’s per unit cost (PUC) for the PHA’s HCV program, adjusted for inflation and taking into consideration that the initial term is longer than 12 months. However, if during the initial term a PHA can demonstrate based on actual leasing and costs that the HAP funding will be insufficient to cover its actual HAP costs for the EHV for the initial term, the PHA may request that HUD adjust the initial funding increment amount for the EHV during the initial funding term. If the PHA has demonstrated the need to do so, HUD will adjust the initial funding amount based on the actual costs incurred upon request by the PHA to ensure the PHA has sufficient funding during the initial funding term to lease all of its EHV and pay its EHV HAP costs through December 31, 2022. If the PHA believes that it needs an adjustment, it should contact its financial analyst in HUD’s Office of Housing Voucher Programs Financial Management Center (FMC).”

Q&A

Q: Can you clarify if or how the agencies partnering with PHAs on EHV are paid? If the CoC or VSP refers a family, or assists the family, does the PHA pay them by way of the services fee, or out of the admin fee? And if so, at what rate? Or are the partnering agencies paid some other way?

A: Paying a fee to a CoC, VSP, or other partnering agency for a referral is not an eligible use of the EHV funding. Section 6 of PIH Notice 2021-15 defines the administrative fees and funding for other eligible expenses a PHA administering EHV may receive. The use of this funding is limited to the activities defined in the notice.

A PHA may enter into an agreement, through the MOU for the EHV program, to reimburse the CoC or other partnering service agencies for EHV eligible expenses. For example, housing search assistance is required to be made available to EHV families during their initial housing search. Housing search assistance may be provided directly by the PHA or through the CoC or another agency or entity. Where housing search assistance is being provided by the CoC or another agency or entity, the PHA may reimburse that entity for the eligible activities as defined in the agreement.

As a reminder, CoC funds may be used to cover many of the costs associated with the EHV Program. For example, Coordinated Entry (CE) grants can be used to cover the CE costs, and RRH funds can be used to assist with housing location etc. In addition, Homeless Emergency Solutions Grants (ESG)-CV funds may be used for referrals, housing location, and other costs, including outreach, essential services in emergency shelter, RRH, and homelessness prevention.

Q&A

Q: Can CoC staff do the HQS inspection and be paid from our PHA administrative fees?

A: Yes, the PHA may contract with other qualified entities to perform HQS inspections, which may include the CoC. However, HQS inspections are ultimately the responsibility of the PHA, and the PHA is responsible for ensuring that the HQS inspection is performed accurately regardless of whether the PHA conducts the inspection or contracts the administrative function out to a third party.

Q&A

Q: In terms of expensing Administrative expenses to EHV, if our PHA has a Central Office Cost Center (COCC), do we charge the same fees to EHV that we do to HCV?

A: Yes, the COCC may charge the same fees to EHV as HCV.

See EHV FAQ #65

Q&A

Q: Are PHAs required to open a new bank account to disburse the EHV HAP to landlords?

A: No. Funding will be deposited into the HCV bank account already on file with HUD. HUD does not have the ability through HUDCAPS to deposit EHV funds into a different bank account. The PHA at its discretion may transfer funding to a designated EHV bank account. Any account established for program administration must include a HUD General Depository Agreement. At minimum, the PHA must account for each fund separately including EHV HAP, EHV Administrative Fee, EHV services fees, and EHV Preliminary and Placement fees.

Q&A

Q: Notice PIH 2021-15 6. d. iv. B. states that services fee funding can be used for “tenant readiness services,” where the PHA may use funding to help create customized plans to address or mitigate barriers – does this include paying rent arrears or other debts owed by participants to address debts from previous tenancies (i.e. rental arrears, charges in excess of security deposit after a move)?

A: No. The services fee cannot be used to pay rental arrears, including debts owed to the PHA. However, PHAs, CoCs, and other service providers may choose to refer families to the Consumer Financial Protection Bureau (CFPB) or other state and local programs that may help tenant’s credit history. Treasury’s Emergency Rental Assistance (ERA) Program would also be a good resource for rental and utility arrearages.

Q&A

Q: Can a PHA over-issue its allocation of EHV in recognition that not all families succeed under its program in leasing a unit?

A: PHAs are not currently restricted from over-issuing EHV vouchers to account for success rates and/or potential attrition in its efforts to fully lease their allocation of EHV. As is the case with the regular HCV program, PHAs must exercise care to prevent over-leasing (where EHV unit months leased (UMLs) will exceed unit months available (UMAs)) at the end of the initial funding term (12/31/22)), as PHAs will not receive additional EHV funding during the initial funding term to cover over-leased units and over-leased units are not taken into account when determining the PHA's EHV renewal funding eligibility for CY 2023. (See section 7 of PIH Notice 2021-15 regarding permissible funding adjustments during the initial funding term.) Also, given the unique partnerships, programmatic flexibilities, and service fees available with the EHV program, PHAs should account for the potential and realized impacts these advantages may have on EHV success rate in terms of managing the EHV issuance process.

Q&A

Q: Is there any guidance regarding PIC-NG?

A: The EHV Operating Notice references that HUD will utilize the new Public Information Center – Next Generation (PIC-NG) system for EHV. Given delays in the implementation of the new PICNG platform, the Department will collect EHV tenant information using its existing IMS/PIC system in the same way it currently collects tenant information for the Housing Choice Voucher program.

Notice PIH 2021-20 outlines the updated EHV reporting requirements for PHAs using IMS-PIC. This notice can be found on HUD's website at:

<https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-20.pdf>

Q&A

Q: Will HMIS data entry be required for EHV's?

A: No, PHAs will not be required to enter EHV's into HMIS. However, if a family with an EHV receives services from a program that requires use of HMIS, the clients must be entered into the HMIS project from which they are receiving services. For example, if a family with an EHV is receiving case management services through ESG-CV, the family must be added to the ESG-CV project in HMIS.

Additionally, per the Notice, EHV's will be receiving referrals from the CoC's coordinated entry (CE) system. The CoC must have a way to record assessments and referrals from CE system and should track referrals to EHV. HUD recently updated the HMIS data standards to include a response option in the coordinated entry element (4.20) to record referrals to EHV's. While HUD is not requiring these elements to be programmed in HMIS until October 1, 2021, HUD encourages communities to begin collecting that data now whether in HMIS or otherwise and be prepared to provide information about referrals to the PHAs it is working with for the EHV program. HUD encourages CoCs to develop a report that they can regularly run that, in the very least, tracks information on the number of referrals to EHV. It would be ideal to not only include data on the number of referrals to EHV but to also include data on the characteristics of those being referred (e.g. race, ethnicity, gender).

See EHV FAQ #84

Q&A

Q: Will the EHV program have its own CFDA number?

A: No. PHAs will report under 14.EHV in the Financial Data Schedule (FDS). PIH's REAC will provide accounting and FDS reporting guidance separately.

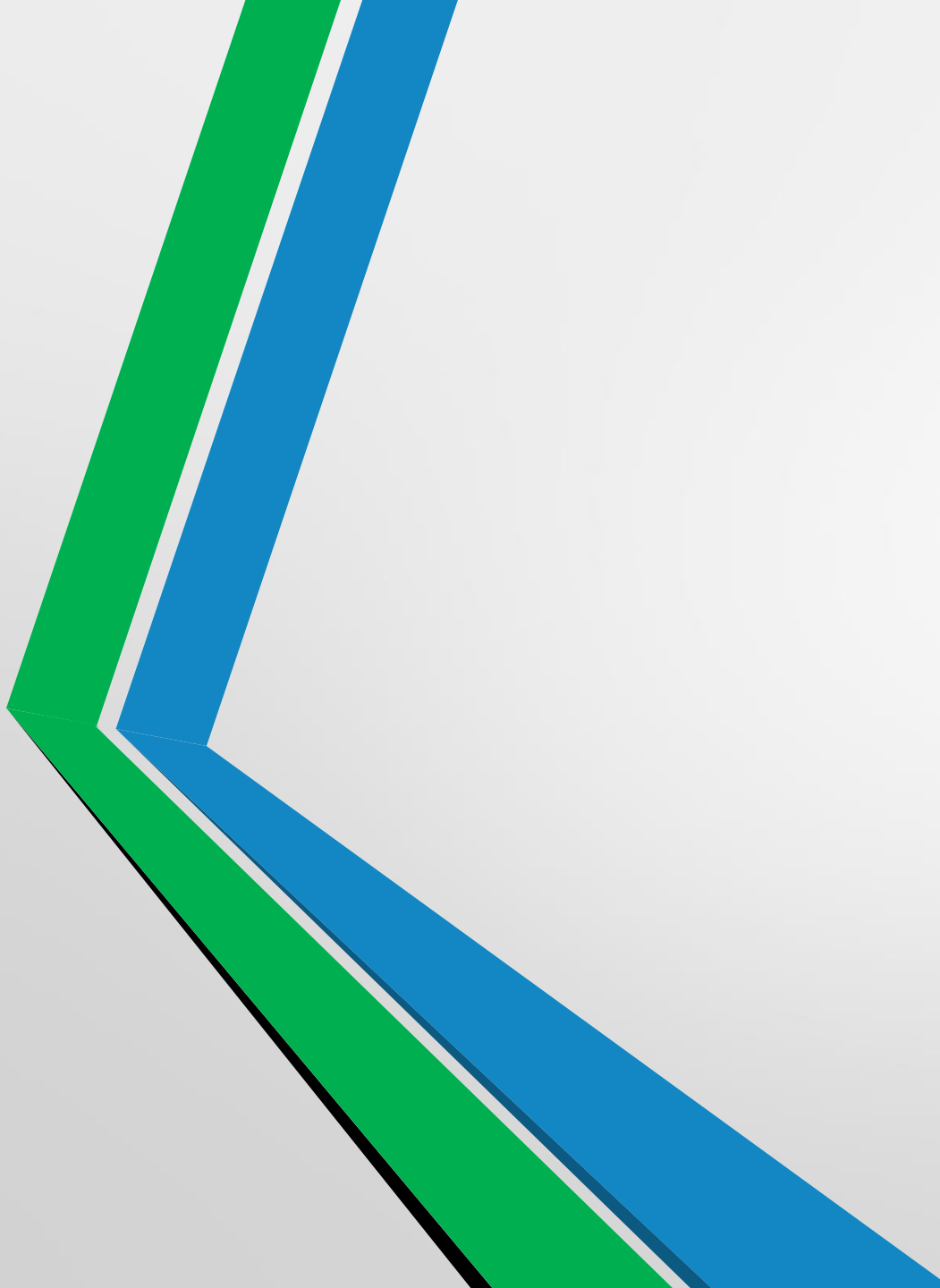
See EHV FAQ #85

Q&A

Q: In terms of VMS Reporting, are EHV's considered MTW (HCV) or Special Purpose Vouchers?

A: EHV's will be treated as Special Purpose Vouchers. There will be designated VMS fields for EHV leasing and expenses.

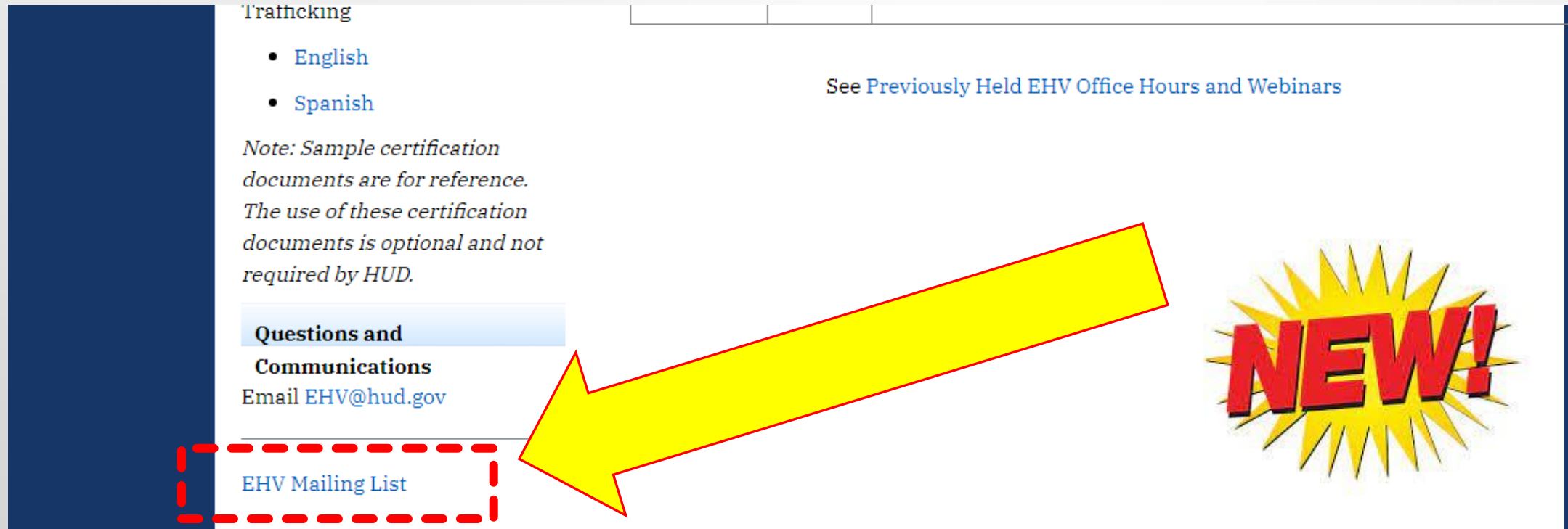
See EHV FAQ #87



HUD Q&A

Have you joined the EHV Mailing List?

(Look at the bottom of www.hud.gov/ehv)



The screenshot shows a webpage with a dark blue sidebar on the left and a white main content area. The sidebar contains a 'Tracking' section with links for 'English' and 'Spanish', a note about sample certification documents, a 'Questions and Communications' section with the email EHV@hud.gov, and a red dashed box around the 'EHV Mailing List' link. The main content area has a 'See Previously Held EHV Office Hours and Webinars' link. A large yellow arrow with a red outline points from the right towards the 'EHV Mailing List' link. To the right of the arrow is a yellow starburst graphic with the word 'NEW!' in red.

Tracking

- [English](#)
- [Spanish](#)

Note: Sample certification documents are for reference. The use of these certification documents is optional and not required by HUD.

Questions and Communications
Email EHV@hud.gov

[EHV Mailing List](#)

[See Previously Held EHV Office Hours and Webinars](#)

NEW!



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Resources

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Reminders

- MOU deadline is July 31, 2021
- Submit your questions to ehv@hud.gov
- 8/3 office hours will focus on prioritization
- Today's recording and materials will be posted to <https://www.hud.gov/ehv>

We want your feedback! Are these calls helpful? Do you want to hear other topics? Do you like the format? Send feedback to ehv@hud.gov.



Thank you!