

Grant Award Package Training for FY2021 Comprehensive Housing Counseling Grants

Presented by the HUD Office of Housing Counseling

Audio is only available by conference call Please call: 844-291-6362 Participant Access Code: 7644634

February 3, 2022

Webinar Logistics

Audio is being recorded.

- The playback number along with the PowerPoint & a transcript will be available at: <u>http://www.hudexchange.info/programs/housing-counseling/webinars/</u>
- The webinar will be posted in 7-10 days.
- Handouts were sent out prior to webinar. They are also available in **Handouts** section of the Control Panel.
 - Click on the document name to start the download.



Ways to Ask Questions

- Please submit your text questions & comments using the Questions Panel.
 We will answer some of them during the webinar.
- You can also send questions to: housing.counseling@hud.gov with the topic in the subject line.



Certificate of Training

- If you logged into the webinar, you would receive a Certificate of Training from GoToWebinar within 48 hours.
- Please print it out & save for your records.



Introduction

Tracie Oaks-Ross

Office of Policy and Grant Administration Office of Housing Counseling

FY21 Housing Counseling Awards

- \$51 Million for FY2021
- 2-Year Award
 - Successful applicants will submit an Expression of Interest letter for FY22 funds
- 18-Month Period of Performance
 - 04/01/2021 09/30/2022
- Budget Line Items for FY2021 Awards
 - Counseling Services (9500)
 - MSI Initiative (9525)
- MSI Initiative
 - Memorandum of Understanding due no later than March 31, 2022

FY21 Housing Counseling Awards

This is a two-year NOFO – FY21's competition will distribute CHC funding for FY22.

- HUD will use the grant applications received for FY21 and the corresponding scores to make awards for FY22, subject to the availability of appropriations.
- HUD will contact eligible FY21 grantees to determine their interest in FY22 funds.
- You will receive an Expression of Interest letter (via email) asking if you are interested in FY22 funding.



- Introduction Tracie Oaks-Ross
- Grant Execution Process Tracy Badua
- Grant Agreement:
 - Articles III, IV, and V Rebecca Maclean
 - Articles IX and X– Joel Schumacher
 - Articles XI and XIV Rebecca Maclean
 - Article XXIII Melissa Noe



Grant Execution Process

Tracy Badua

Office of Policy and Grant Administration Office of Housing Counseling

Grant Package Checklist

- Along with your grant agreement, you received this checklist.
- Grantee will not have access to grant funds until all required grant execution documents are returned and approved.
- Ask your POC for an extension if needed.

Office of Housing Counseling FY 2021 Housing Counseling Grant Award Package Checklist

- ✓ This is a checklist of required documents grantees must submit to execute their FY 2021 grant awards. See enclosed grant agreement for detailed requirements of each item.
- ✓ All documents must be returned to your assigned Point of Contact (POC) within 15 business days of the date of the enclosed award letter. An incomplete package will delay your ability to access grant funding.

Form HUD-1044 and Grant Agreement Signature Page

- HUD-1044 signed and dated
- Grant Agreement signature page signed and dated

Indirect Cost Rate Documentation

- Copy of Grantee's Negotiated Indirect Cost Rate Agreement (NICRA), OR
- □ Statement that Grantee elects to charge a de minimis rate of 10% of modified total indirect costs in accordance with 2 C.F.R. Part 200.414, **OR**
- □ Statement that Grantee will not seek reimbursement of indirect costs

Financial Management Systems

Certification from the executive director or other qualified professional that the organization's financial management systems satisfy the requirements in 2 C.F.R. §200.302

Form HUD-1044 Grant Agreement Signature Page

- HUD-1044 is the official government form that shows your grant amount, grant number, and your point of contact at HUD.
- Sign, date, scan, and return:
 - The final page of the Grant Agreement to HUD (Do not send back the entire grant agreement)
 - 1 copy of the HUD-1044 with block 19 completed
- Keep your hard copies of your executed grant package for your records.

Indirect Cost Rate Documentation

Three options on Indirect Cost Rates

- Negotiated Indirect Cost Rate Agreement (NICRA) containing final rates for any period for which the grantee will receive reimbursement of indirect costs,
- Statement that grantee elects to charge a de minimis rate of 10% of the modified total indirect costs in accordance with 2 CFR 200.414, **OR**
- Statement that the agency will not bill HUD for indirect costs

Financial Management Systems (FMS)

• Provide documentation (a certification from the executive director or other qualified professional) demonstrating that the organization's financial management systems satisfy the requirements in regulations at 2 CFR 200.302.

• FMS must identify:

- All federal awards received & expended
- Source & application of funds, including comparison of expenditures with budget amounts for each award
- Accurate & complete disclosure of financial results of each award
- Effective control and accountability over funds, property, and other assets
- View the full text of <u>2 CFR 200.302</u>



Agencies that expend more than \$750,000 in Federal funds:

• Provide the agency's single or program-specific audit

Agencies not required to complete a single or program-specific audit (under 2 CFR 200.501):

• Provide the most recent independent financial audit

Agencies who do not have an audit or who are not required to have an audit:

• HUD will provide a financial review at HUD's expense; contact your HUD POC for information

Code of Conduct

- Submit a written code of conduct that meets the requirements outlined in the award letter IF:
 - Your agency is not listed on the following website: <u>https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants</u>, *OR*
 - Your Code of Conduct has changed since the last time you submitted it to HUD.
- If your agency is listed on the website above, and your Code of Conduct has not changed, you do not need to submit a Code of Conduct.

Projected Budget

The budget must account for how every dollar being billed to the Grant will be spent.

- Projected budget for Grantee and each subgrantee itemizing all proposed expenses under the grant and budget narrative, if necessary.
- Budget may include: salaries, fringe and other employment benefits, travel, training, marketing, outreach, cost of managing a network, HUD Housing Counselor Certification exam fees, and indirect costs, as applicable.
- Initial budget must be approved by HUD POC prior to any expenditures.
- Proposed amendment(s) to projected budget permitted at any time during the Period of Performance. Any changes must be approved by the HUD POC prior to any expenditures.
- Grantees under the HBCU and other MSI funding initiative also must describe how these funds will be used to further the objectives agreed upon in their MOU.

Projected Budget, continued

- Fixed-fee Methodology: Grantees must seek prior approval from their HUD POC.
- Opportunity Zone Expenditures: Proposed budget must reflect the Opportunity Zone expenditure percentage Grantee certified to on the HUD-2996 at application.
- See Article IV of the Grant Agreement for detailed requirements.

Projections for Housing Counseling Grant Activities

- Grantees must submit their HUD-9902 projections through the Housing Counseling System (HCS).
- Enter projections under the "HUD-9902" menu item and select projections for NOFA 2021-1.
- Click the Submit to HUD button, then notify your HUD POC for review and approval.

Projections for Housing Counseling Grant Activities, continued

HCS system updates and projections

- HUD will notify grantees when projections may be entered into HCS
- To meet the immediate projections requirements, use the pdf form HUD-9902
 - For FY21, provide projections using Form <u>HUD-9902 exp. 07/31/2019</u>
 - For FY22, provide projections using Form HUD-9902 exp. 12/31/2024

Projections for Housing Counseling Grant Activities, continued

• Where to Enter Projections in HCS

Save As Draft Submit To HUD	Fiscal Year 2020: 10/01/2019 - 09/30/2020	Fiscal Year 2021: 10/01/2020 - 03/31/2021	Total
Comment required			
8. Households Receiving Group E	ducation by Purpose		
a. Completed financial literacy workshop, including home affordability, budgeting and understanding use of credit	0	0	0
 b. Completed predatory lending, loan scam or other fraud prevention workshop 	0	0	0
c. Completed fair housing workshop	0	0	0
d. Completed homelessness prevention workshop	0	0	0
e. Completed rental workshop	0	0	0
f. Completed pre-purchase homebuyer education workshop	0	0	0
g. Completed non-delinquency post-purchase workshop, including home maintenance and/or financial management for homeowners	0	0	0
 h. Completed resolving or preventing mortgage delinquency workshop 	0	0	0
i. Completed other workshop	0	0	0
Section 8 Total:	0	0	0
9. Households Receiving One-on-	One Counseling by Purpose		
a. Homeless Assistance	0	0	0
b. Rental Topics	0	0	0
c. Prepurchase/Homebuying	0	0	0
d. Home Maintenance and Financial Management for Homeowners (Non-Delinquency Post-Purchase)	0	0	0
e. Reverse Mortgage	0	0	0

Sub-allocation list - MSOs, SHFAs, and Intermediaries

- Completed in the Housing Counseling System under the budget allocation screen.
 - General Allocation Guide:
 <u>HCS Improvement Release v.13.0.0.0 July 2013</u>
 - Allocation Across Fiscal Years (Slides 28-41) <u>HCS Improvement Release v.14.12.0.0 - September 2017</u>
- Enter list of subgrantees and funded branches, and their corresponding award amount sub-allocations.

Sub-allocation list - MSOs, SHFAs, and Intermediaries, continued

- Where to enter suballocations in HCS:
 - For grantees under the HBCU/MSI funding initiative, this funding will be included in Costs of Managing Network

BUDGET				FUNL	DS RETAINED BY G	RANTEE		SUB-ALLO	CATION COSTS			
Total Bud Award:	get: \$\$,836.00 ,061.00	Network	of Managing vork:	0.0	D	To Be Sub	-Allocated:	\$	336,06	
Grant Rat		550	58 %	India	ect Costs: \$	0.0	D	Sub-Alloc		\$		0.00
				Tota	l Funds		-	FY 2021 T	otal Allocation:	\$		0.00
					ined by \$	0.0	0	FY 2021 E	alance:	\$	336,06	1.00
				Gran	itee:			FY 2022 A	llocation:	\$	(0.00
								Remaining) Funds:	\$	336,06	1.00
			Allo	Print	Allocate By # of Cancel Close th			e By # of Cl ojection	ients			
Qtr 1	Qtr 2	Qtr 3	Allo Qtr 4	Print	· · · · ·			·	ients			
Qtr 1 Status	Qtr 2 Sub-A			Print	Cancel Close th		9902 Pr	·	ients Sub-Allocation	n Ag	ency Tota	al Budge
-	1 · 1			Print	Cancel Close th	is window	9902 Pr	Projected		-	ency Tota \$	
Status	1 · 1			Print	Cancel Close the	# of Counselors	9902 Pr	ojection Projected ients	Sub-Allocation	0	-	0.0
Status Active	1 · 1			Print	Cancel Close the	# of Counselors	9902 Pr	Projected ients	Sub-Allocation	0	\$	0.0
Status Active Active Active	1 · 1			Print	Cancel Close the	# of Counselors	9902 Pr	rojected ients 0	Sub-Allocation \$ 0.0 \$ 0.0	0	\$	0.0
Status Active Active	1 · 1			Print	Cancel Close the	# of Counselors	9902 Pr	Projected ients 0 0	Sub-Allocation \$ 0.0 \$ 0.0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	\$\$	al Budge 0.0 0.0 0.0 0.0 0.0

Client Management System

- Grantee must certify that they utilize a client management system (CMS) approved to interface with HUD systems.
 - List of approved CMS: <u>https://files.hudexchange.info/resources/documents/HUD-Certified-</u> <u>CMS-Products-for-HUD-HCA-Use.pdf</u>
- Intermediaries, MSOs, and SHFAs must list their subgrantees and the CMS they use.



Articles III, IV and V

Rebecca Maclean

Office of Policy and Grant Administration Office of Housing Counseling

Article III: Period of Performance

- Begins: April 1, 2021
- Ends: September 30, 2022
- NEW: If an applicant indicated on their HUD-9906 form that program costs would be incurred prior to award, reimbursements may be requested for costs incurred no earlier than October 1, 2020.
- An extension of the performance period must be requested in writing no later than September 20, 2022.
- Only HUD is authorized to grant an extension.

Article IV: Projected Services and Budget – Scope of Service

- The housing counseling services listed in the Grantee's approved HUD Housing Counseling Work Plan represent the scope of services under this grant.
- During grant execution, the submitted 9902 projections will be checked against the agency's work plan.
- Grantee must receive approval from the HUD POC before implementing any changes in projected services and budget proposed in its application.

Article IV: Projected Services and Budget – Scope of Service, continued

• When there is a change in staff or management responsible for the Grantee's housing counseling program, the Grantee must notify its HUD POC in writing within 15 days of the change.

Article V: Subcontract and Subgrants – General Prohibition Against Subcontracting

Grantees shall not sub-grant, transfer, or contract any of the work under the agreement.

Exceptions apply if:

- Sub-grant, etc. was described in approved NOFO application and funded in Grant or otherwise approved by HUD.
- Sub-grant, etc. is for web-based education.
- Sub-grant, etc. is for the purchase of supplies, materials, etc.

Article V: Subcontracts and Subgrants – Requirements for Subgrants

- Eligible Subgrantees/Branches: Grantee may make subgrants to Affiliates, which are not HUD-approved, provided that the quality of services meets or exceeds the standards for HUD approved LHCAs.
- Changes to Network Composition: Submit written request to HUD to amend subgrantee or branch list or corresponding subgrant amounts.

Article V: Subcontracts and Subgrants – Requirements for Subgrants, continued

- Funding Agreements: Grantee shall execute a written subgrant agreement with each Subgrantee before disbursing funds to the Subgrantee. Copies of all subgrant agreements must be maintained and made available to HUD.
- Responsibility for Grant Administration: Grantee is responsible for managing the daily operations of its program and agrees to accept responsibility for its Subgrantees' compliance with the applicable provisions of the Grant Agreement. Grantee must monitor the performance of its Subgrantees and take appropriate action to resolve problems to ensure compliance.

Article V: Subcontracts and Subgrants – Requirements for Subgrants, continued

Subgrants to Affiliates and Allocation of Funds to Branches:

 Grantee must maintain copies of all subgrant agreements and a written record on how it distributed funds to its Subgrantees. Grantees must list their Subgrantees' and Branches' corresponding sub-allocations in HCS.

Documentation of Funding Decisions

• If a Grantee awards subgrants competitively, it must document its process and notify the public (if applicable).



Articles IX and X

Joel Schumacher

Office of Policy and Grant Administration Office of Housing Counseling

Article IX: Cost

Prior Approval for Revisions to Work Plan and Budget

- Prior approval required when:
 - Grantee receives \$250,000+ AND
 - Revisions comprise more than a 10% deviation of direct costs
 - See 2 C.F.R. 200.308

Allowable Costs

- Reimbursement is based on actual expenses and must be:
 - Allowable
 - Allocable
 - Reasonable
 - See Also, Eligible Activities in Article IV of this grant agreement

Article IX: Cost, continued

Indirect Cost Rates—Three Choices:

- 1.10% de minimis
- 2. Use NICRA
- 3. Approved Cost-allocation plan
 - Costs must be consistently charged as either indirect or direct costs.

Direct Grantees

- If Grantee has a NICRA, must provide documentation from cognizant agency showing the approved rate.
- Those without a valid NICRA can elect 10% de minimis.
- Subgrantees
 - Can not use parent agency NICRA.
 - Grantee must submit copies for each subgrantee that claims a NICRA.
 - 10% de minimis option, but grantee cannot require de minimis when a sub has a NICRA.

Article IX: Cost, continued

Period of Availability

• Activity incurred within the Period of Performance, unless an extension is granted.

Multiple Sources of Funding

- HUD will not cover the same portion of services or goods already covered by another funding source.
- Grantees may bill HUD and another funding source for the same client if the cost of counseling exceeds the amount of reimbursement covered by HUD.
 - However, grantees must have adequate internal controls to ensure no doublebilling.
 - HUD reserves the right to request documentation other information to verify HUD is not reimbursing grantees for activities already billed to another funding source.

Article IX: Cost, continued

Burden of Proof

- The burden of proof for services rendered rests with the Grantee.
- All grant expenditures and supporting records are subject to review.
- Improper payments may be disallowed and subject to repayment using non-federal funds or an offset to current or future grant awards.
Article X: Reporting

- Grantees must submit Grant Activity Reports (GAR) in conjunction with each drawdown request.
- GARs must include all information indicated in the Grant Agreement.

- Grantee's name, address, and grant number
- Start and end dates of the reporting period
- Hourly rate
- Staff and hourly rate
 - Identify each counselor or other employee whose time or activity, or both, is billed to the Grant, the individual's title, the individual's FHA Connection Housing Counselor ID number demonstrating certification (as applicable), and the hourly rate used to calculate reimbursement.

- Staff hours
- Fixed fee methodology (if applicable)
- Itemized expenses
- Required certification
- Form HUD-9902
- Reverse Mortgage Default Counseling Activities (if applicable)

In addition to the previous slide, Intermediaries, SHFAs, and MSOs must submit the following:

- Oversight Activity (if applicable)
- Sub-allocations
- Costs of Managing a Network
- Federal Financial Report (SF-425)
- Changes in Composition or Network Size (Subgrantees and Funded Branches)

Final Report

- A final report is due 120 days after the period of performance has ended.
- If the grantee does not submit all reports in accordance with this section within one year of the period of performance end date, the Federal awarding agency must report the grantee's failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently FAPIIS).

Final Report

- Any problems, delays, or adverse conditions that impaired their ability to meet the objective of the federal award, and any favorable developments which enabled their ability to meet the objective of the federal award sooner or at less cost.
- Grantees with expired Grants and Undisbursed Balances at the end of the Period of Performance must provide a narrative description explaining the challenges leading to delays in Grant closeout.

- Submit a certification, signed by an authorized individual, which states that all applicable closeout activities required in 2 CFR § 200.343 have been completed.
 - This certification is in addition to the certification statement required in grant activity reports.

- Submit a NICRA containing final rates for any period for which the grantee received reimbursement of indirect costs.
 - This obligation exists even post-closeout.
 - Grant award may be adjusted to account for revisions to final indirect costs rates (See 2 CFR 200.435(a)).

Compliance with NOFO Obligations

- Should Grantee fail to meet the commitments made in the Grant application, HUD may adjust the award amount and require repayment using non-federal funds or an offset to future grant awards.
- May include but are not limited to:
 - network size
 - oversight of funded network
 - counselors

Article X: Federal Sub-award Reporting (Only for Intermediaries, MSOs, and SHFAs)

- Report required for sub-awards of \$30,000 or more.
- Entities with gross incomes less than \$300,000 in the previous tax year are exempt from sub-award reporting requirements.
- Details found at: <u>www.fsrs.gov</u>
- Report is due one month after the month in which the sub-award is obligated



Articles XI and XIV

Rebecca Maclean

Office of Policy and Grant Administration Office of Housing Counseling

Article XI: Payment Requests

Article XI is where to find information on:

- General Payment Procedures
- Documentation of Expenses

Article XI: General Payment Procedures

- HUD will only process payment requests on receipt of an acceptable Grant Activity Report (GAR).
- After making the voucher request in eLOCCs, email a signed copy of the voucher form to your HUD POC. All sections of the HUD-50080 must be complete.
 - Budget Line Items 9500 & 9525
 - Program Area CHC
- LOCCS user guides found at

https://www.hud.gov/program_offices/cfo/loccs_guidelines

Article XI: Documentation of Expenses

Maintain documentation of direct costs:

- invoices
- receipts
- cancelled checks
- documentation of personnel expenses
- client lists

Submit to HUD POC *upon request*. Expense documentation is requested during a performance review.

Article XIV: Defaults and Remedies

Delayed use of grant funds may result in default and recapture:

- Failure to execute the grant before the end of the period of performance
- Failure to submit a drawdown request for all remaining funds within 120 days following the end of the period of performance.



Article XXIII HBCU/MSI Funding Initiative

Melissa Noe Office of Policy and Grant Administration Office of Housing Counseling

• Article XXIII is only applicable to grantees that received an award for the HBCU/MSI Funding Initiative. You can verify if you received this funding by referring to the FY 2021 HUD-1044.

16. Description

FY 2021 Grant Type: COMPREHENSIVE COUNSELING

HC1 funding to be spread under Housing Counseling Grant Voucher, LOCCS Budget Line Item 9500. MSI funding to be spread under Housing Counseling Grant Voucher, LOCCS Budget Line Item 9525.

Total Award: \$40,000 HC1 / Counseling Services (9500): \$35,000 MSI / Minority Serving Institution Initiative (9525): \$5,000

LOCCS Draw Down Expiration Date: January 30, 2023 Period of Performance: April 1, 2021, to September 30, 2022

- Memorandum of Understanding (MOU)
 - You must submit an MOU for each funded HBCU/MSI partner
 - At a minimum, the MOU must contain:
 - Partnership purpose and associated activities
 - Management and organizational structure
 - Each organization's role and responsibilities for funding, participation, and compliance
 - How the grantee will integrate data sharing and reporting capabilities
 - You are expected to initiate the activities promptly
 - HUD may withhold or recapture theses funds if you fail to provide a copy of the signed MOU(s) by March 31, 2022.

• Projected Budget:

• You must describe how the HBCU/MSI funds will be used to further the objectives agreed upon in the MOU in their projected budget. Follow projected budget requirements in Article IV(B).

For parent agencies (intermediaries, SHFAs, and MSOs):

- Itemized budgets for all MSI partners needed;
- You won't be able to update HCS suballocations for the MSI partnerships since the MSI partners are not HUD-approved agencies, therefore not listed under subgrantees.

You can keep the MSI money in the "Costs of Managing a Network" category.

BUDGET		FUNDS RETAINED BY GRANTEE			SUB-ALLOCATION COSTS			
Total Budget: Award:	\$ 781,518.00 \$ 1,075,515.00	Cost of Managing	\$	94,950.00	To Be Sub-Allocated:	\$	976,511.00	
		Network:			Sub-Allocated:	\$	976,511.00	
Grant Ratio: 138 % Agency Total Budget < HUD Grant		Indirect Costs:	\$	4,054.00	FY 2020 Total Allocation:	\$	1,075,515.00	
		Total Funds			FY 2020 Balance:	\$	0.00	
		Retained by Grantee:	\$	99,004.00	FY 2021 Allocation:	\$	0.00	
					Remaining Funds:	\$	0.00	

• Grant Activity Reporting Requirements:

- You must indicate the amount of funds expended and the relevant category of eligible activities carried out pursuant to this funding initiative; and
- You must include a brief narrative describing progress and challenges in achieving performance goals and objectives described in the NOFO application.
- A Note on Reporting Counseling and Education Activities:
 - If your scope of work includes providing one-on-one counseling and/or group workshops to the MSI partner's community, you can report that on the 9902.

• Final Report Requirements:

- You must include everything required for Grant Activity Reports; and
- Describe the extent to which you (or your partner(s)) were able to fulfill the program objectives described in your NOFO application, including outcomes and lessons learned.
- At a minimum, you must address the five topics below:
 - How you measured outcomes on the target population (examples listed in the Grant Agreement);
 - How the institution's students and faculty were included in the proposed activities;
 - How the institution expanded its role in the target community;
 - How you would revise the program if you were to received second year funding;
 - And how HUD should refine this funding initiative.



Conclusion

Tracie Oaks-Ross

Office of Policy and Grant Administration Office of Housing Counseling

Office of Housing Counseling



- Archived Webinars on reporting <u>https://www.hudexchange.info/programs/housing-</u> <u>counseling/webinars/</u>
- HUD-9902 Online Toolkit: <u>https://www.hudexchange.info/programs/housing-</u> <u>counseling/9902/</u>



Questions

Get Credit!

- Webinar materials will be posted on the HUD Exchange in the Webinar Archive
 - <u>https://www.hudexchange.info/programs/housing-</u> <u>counseling/webinars/</u>
 - Find by date or by topic
- To obtain credit
 - select the webinar, and
 - click "Get Credit for this Training"

Get Credit for this Training

If you have attended or completed this training, select the button below in order to get credit and add the course to your transcript.

Get Credit

Before You Go

Please give us feedback in the Question Box

- Was this webinar useful to you? To your clients?
- Will you share the information with your co-workers?
- Any other comments?



Office of Housing Counseling



Find us at:

www.hudexchange.info/counseling

Counselor Training and Testing website: www.hudhousingcounselors.com

Email us at: housing.counseling@hud.gov



Thank You for Attending!