



# Final Transcript

## **HUD: Grant Award Package for Grantees (External)**

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### **SPEAKERS**

Virginia Holman  
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Tracy Badua  
Rebecca Maclean  
Joel Schumacher  
Melissa Noe

### **PRESENTATION**

Moderator                Ladies and gentlemen, thank you for standing by. Welcome to the Grant Award Package for Grantees conference call. At this time, all participants are in a listen-only mode. [Operator instructions]. As a reminder, this conference is being recorded.

I would now like to turn the conference over to our host, Ms. Virginia Holman. Please go ahead.

Virginia

Thank you very much, and welcome to the training. As the operator said, it's on the grant award package training where we're going to go over the package that you're going to have to send back to us for those who received grants. That is a reminder that this training is for housing counseling agencies who received a grant, so if you didn't, you can stay on or leave. Your choice.

Next slide. As the operator said, the audio is being recorded. We will be posting the playback number along with the PowerPoint and a transcript on HUD Exchange, and that usually takes about a week. We'll let you know when that's happened.

I did send out the PowerPoint this morning as a handout, and it's also available in the handout section of the control panel on the right hand side. You just need to click on the document name, and it will download.

Next slide. Please submit your questions and comments in the question panel. We will be answering some of them during the webinar. We'll try to get to as many as we can, but we'll make sure at some point you will get an answer to your question.

After the webinar and any time in the future, you can also send your questions and comments to [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov), and put the topic, Grant Award, in the subject line so we get it to the right person.

Next slide. If you've logged onto the webinar, you're going to receive a certificate of training from GoTo Webinar within about 48 hours. You're going to need to print it out and save it for your records.

Next slide. Now, I'd like to turn it over to Tracy Oaks-Ross. Tracy.

Tracy O.

Thank you, Ginger. Thank you, everyone. Again, this is Tracy Oaks-Ross. I'm with the Office of Policy and Grant Administration, and I'm going to get us started today by first providing an overview of the fiscal year '21 NOFO Awards, and then briefly talk about today's agenda. Thank you.

So, for fiscal year 2021, we had \$51 million to distribute for the comprehensive NOFO which included \$3 million for the Minority Serving Institutions initiative. Based on your feedback, we've gone back to the two-year NOFO and the expression of entrants' process which we'll discuss briefly in a moment. The period of performance for this year's

NOFO is 18 months which started on April 1, 2021 and extends through September 30, 2022.

As many of you may recall, during the How to Apply training that we held back in September, we highlighted the shift in the period of performance knowing that there may be some agencies that have incurred costs based on our historical start date for the period of performance. There was a provision in this NOFO that allowed agencies to request reimbursement for costs prior to April 1<sup>st</sup>. So, if you have indicated as such in your NOFO application, please reach out to your POC for additional guidance on this.

For the budget line items in your award letter and the 1044, I'm sure many of you have noticed that your award has been split into two budget line items. There's one for counseling services, N-9500, and then the MSI initiative, 9525. So, if you are participating in the MSI initiative, you will see the amount of funding that you received on both your award letter and your 1044.

Additionally, please refer to your grant agreement for some added guidance, and again, we'll discuss the MSI initiative a little bit later in this presentation.

Lastly, for grantees participating in the MSI initiative, you will need to provide an MOU with your MSI partners no later than March 31<sup>st</sup> of 2022. Again, Melissa will go into a bit more detail toward the end of this presentation.

Next slide. Again, as I just mentioned, this is a two-year NOFO which means for those of you who are successful and awarded funds for fiscal year '21, you will not have to apply for fiscal year '22 funding. Instead, we will reach out to you to determine your interest in fiscal year '22 funding through an expression of interest letter in which you will have an opportunity to let us know what your interest is in receiving those fiscal year '22 grant funds.

Next slide. So, here's an overview of what we'll be discussing today. Tracy Badua will be going over the grant executive process. Rebecca Maclean, Joel Schumacher, and Melissa Noe will be going over the grant agreement, and then working behind the scenes, we do have several

members of our NOFO team that will be answering questions that come through the questions box. So, feel free to ask questions during the presentation.

Next slide. I'm going to go ahead and turn it over to Tracy Badua.

Tracy B. Thank you. Hi, everybody. This is Tracy Badua from the Office of Policy and Grant Administration. I'm going to be going over the grant execution process.

This first slide here is about the grant package checklist, and along with your grant agreement you should have received this checklist as part of that PDF that you received. You will not have access to your grant funds until all required grant execution documents are returned and approved, so if you do need an extension to be able to submit all of these documents, for example, the Indirect Cost Rate documentation or the Financial Management System certification, reach out to your HUD point of contact, and they'll be able to provide you some guidance on when you can return those documents.

Again, it's important that you do complete the full grant execution process and return everything that we require because you won't be able to submit a voucher and get your award money until you have completed all these requirements.

Next slide, please. The Form HUD-1044, in your grant package this is the Assistance Award and Amendment document. It's the official government form that shows your grant amount, grant number, and your point of contact at HUD. So, when you hear us referring today to your HUD POC or HUD point of contact, you can look to your Assistance Award Amendment HUD-1044 for that information.

You will be signing, dating, scanning, and returning this final page of the grant agreement to HUD as well as a copy of this HUD-1044 with the block 19 completed. Again, this is all going to be done via email, so please keep the hard copies of your executed grant package for your own records.

So, one of the things that you will be responsible for submitting as part of your grant execution process is your Indirect Cost Rate documentation. There are three options for indirect cost rate. There is the Negotiated

Indirect Cost Rate Agreement, or NICRA, as you may be hearing that referred to today. This contains final rates for any period for which the grantee will receive reimbursement of indirect costs.

We will also accept a statement that the grantee elects to charge a de minimis rate of 10% of the modified total indirect cost in accordance with 2 CFR 200.414 or a statement that the agency will not bill HUD for indirect costs, and I believe we'll go into more detail about this a little bit later, but just to remind you that we will be looking for that indirect cost rate documentation.

You will also provide documentation in the form of a certification from your executive director or other qualified professional at your organization demonstrating that the organization's financial management systems satisfy the requirements and our regulations.

So, these financial management systems must identify all federal awards received and expended, the source and application of the funds including a comparison of expenditures with budget amount for each award, an accurate and complete disclosure of financial results of each award, and effective control and accountability over funds, property, and other assets.



This is just a quick overview of it. You can view the full text of the regulation here at 2 CFR 200.302, and in case you need to click on the links, they are available in the handouts that were sent out with from our organizer and also in the handout section of your GoTo Webinar. You can download it and click on the link from there.

You will also need to submit a copy of your audit. So, for agencies that expend more than \$750,000 in federal funds, you will provide your single or program-specific audits. For agencies not required to complete a single or program-specific audit, you will provide your most recent independent financial audit, and for agencies who don't have an audit or are not required to have an audit, HUD will provide a financial review at our expense, so please contact your HUD point of contact for more information if this doesn't apply to you.

Another item that we'll need is your Code of Conduct, and this is a written statement that covers your conflicts of interest and governs the actions of your employees engaged in the selection award and administration of contract. So, submit a written Code of Conduct that meets the requirements outlined in the award letter if your agency is not listed on

that website, this is our HUD website that keeps a record of all of the Codes of Conduct we receive, or if our Code of Conduct has changed since the last time you submitted it to HUD.

So, again, if your agency is not listed in that website or if it's changed, submit it to us. If it's already there and it hasn't changed you don't need to submit a new one.

For the projected budget, your budget must account for how every dollar being billed to the grant will be spent. So, the projected budget for the grantee and each subgrantee itemizing all proposed expenses under the Grant and Budget Narrative, if necessary, is required for you to execute your grant. We'll need to know how you plan on spending the grant money.

This budget may include salaries, fringe and other benefits, travel, training, marketing, outreach, cost of managing a network, HUD housing counselor certification exam fees, and indirect costs. This initial budget must be approved by your HUD point of contact prior to any expenditures. If you need to change your budget at any time, your proposed amendment

must be approved by your HUD point of contact prior to any expenditures, but you can do this any time during the period of performance.

So, if a few months from now you decide that you're not going to do as much travel as you thought, you can revise your budget and send that to your HUD point of contact for approval.

Then, just a quick note that grantees under the HBCU and other MSI funding initiatives must also describe how these funds will be used to further the objectives agreed upon in your MOU, and we will go into more detail about this HBCU and MSI funding initiative later in the presentation, but I just wanted to highlight that for you here.

Some more about the projected budget. If you have a fixed-fee methodology, please seek prior approval from your HUD point of contact for opportunity zone expenditures. At the time of grant application, you should have filled out the HUD-2996, a form to be able to receive these opportunity zone preference points, so your proposed budget must reflect that percentage that you stated in that certification.

For everything that I just mentioned about this projected budget, please see Article 4 of your grant agreement for detailed requirements, and that grant agreement is in that big PDF file that we sent you with your letter with your HUD-1044. Your grant agreement is in there.

Projections for housing counseling activities. So, grantees must submit their HUD-9902 projections through the Housing Counseling System or HCS. You will enter it under the HUD-9902 menu item and select projections for NOFA 2021, and you'll click to submit the Submit to HUD button, and then notify your HUD point of contact for review and approval.

Now, we are finalizing some HCS system updates that will allow grantees to enter their projections into HCS, so you may get an error message saying that the projections are unavailable for you to enter, so we will notify you when you can go ahead and go into HCS and do that. In the meantime, to make sure that you are able to execute your grants and then submit your vouchers for that reimbursement, you can meet your immediate projections requirements by using your PDF forms that we've linked here.

There were some changes to the HUD-9902 Housing Counseling Activity reports between the two fiscal years, so that's why it's split out here, and again, our period of performance actually does span two fiscal years because it is an 18-month period of performance. So, for FY '21 you'll use this earlier HUD-9902 form that has—the form states that it expires as of 2019, but we do have an existing information collection extension on that, but that will have slightly different categories than the FY '22 HUD-9902 which is this latter link that you will use for your fiscal year '22 projections.

This is just a screenshot of what you'll be looking at when you do enter your HUD housing counseling grant activities projections in the HCS system. So, you can see it does split it out by fiscal year, and this is actually from last year, but it will have one for fiscal year 2021 and fiscal year 2022. So, if you're doing this manually if you're not able to do it in HCS at this time due to the system update, you will submit those two PDFs with your projected numbers for how many rental, topic, one-on-one counseling households you will serve, for example.

So, we will be keeping an eye out for those. For those of you who are unable to enter projections, we'll be looking for the PDFs of the projections in the materials that you return to us.

For the sub-allocation list, this applies to the MSOs, SHFAs, and intermediaries, so our parent organizations, and these sub-allocations are completed in the Housing Counseling System under the budget allocation screen, and we have some links here with details on how to do this, but we'll go over it briefly here, too. We have this general allocation guide and allocation across fiscal years slides. So, you will be entering a list of your subgrantees and funded branches and then their corresponding award amount sub-allocations.

This next slide shows where you will enter those sub-allocation in HCS, and this is available now, so for you parent organizations you will be able to go and enter this information. You have your total budget there, and that's your total budget for your entire housing counseling program.

You have your cost of managing the network, and again, we have a note here that for grantees with HBCU and MSI funding, this funding will be included in your cost of managing your network. Again, more

information on that later, but I just kind of wanted to highlight it here because we do have that orange box around it in our screenshot, and then there is that section for indirect costs.

As you can see from the screenshot itself, it's split up by quarters. You will be entering the different sub-agencies that you will be splitting your award amongst, and then you have those set allocations, number of projected clients, and so forth. So, you will be responsible for completing that for your network.

Lastly, we require that our grantees use a client management system and certify that they do use a CMS approved to interface with our HUD systems, with our HUD HCS. We have a link to the list of approved CMSs here, so please review that and make sure that your system is in line with our requirements.

Intermediaries, MSOs, and SHFAs must list their subgrantees and the CMS that they use. So, in your certification you must show that your subgrantees are also using a CMS that's approved to interface with HUD's system.

That was an overview of the grant execution process, and we're going to go into some more detail about your grant agreement. I will turn it over to Rebecca Mclean.

Rebecca                      Thanks, Tracy. Good afternoon, good morning, everyone. My name is Rebecca Mclean, and I'm also with the Office of Policy and Grant Administration. I'm going to be walking through some highlights for Articles III, IV, and V of your grant agreement.

Article III is the period of performance, and you've heard the date range already, but just to remind you again, this grant is an 18-month period of performance but began on April 1, 2021 and ends September 30, 2022. As Tracy Oaks mentioned earlier, because we did shift the period of performance forward, we did give applicants an option to request reimbursement as far back as October 1, 2020 if needed.

So, several applicants did do so. That's something you will need to talk to your point of contact at HUD about to make sure that you are getting reimbursed for the right time period.



Also, if you need an extension for your performance period, please keep in mind it must be requested in writing no later than ten days before the end of the period of performance. So, in this case, that's September 20, 2022, and only HUD is authorized to grant an extension, so you will need to check in with your POC and request it and have it approved before you can move forward with a grant extension.

Under Article IV, some of the things we wanted to talk to you about in the projected services and budget scope of service, please keep in mind that the housing counseling services listed in your approved work plan are the scope of services under this grant. So, if you need to make changes to your work plan, please again, work with your HUD point of contact to make sure that that work plan is up to date and approved.

Also, keep in mind during grant execution, your submitted 9902 projections will be checked against the agency's work plan, and again you must receive approval from your POC before implementing any changes in your projected services and budgets that you proposed in your application. If changes have occurred, please as always, reach out to your HUD point of contact and let them know what changes need to happen and work with them to get the approvals in that.

Also under Article IV, please keep in mind that if there are any changes in staff or management responsible for your housing counseling program, you must notify us within 15 days of the change, and that is really important especially since we do a lot of work electronically during the pandemic. If we don't have the right contact information for you or your staff, then we are not getting you the information that you need, and that is incredibly important. So, please keep that in mind as soon as possible, but definitely within 15 days of any changes that are made.

Under Article V, we do have a general prohibition against subcontracting, so generally grantees shall not subgrant, transfer, or contract any work under the agreement, and we do have some notable exceptions.

Obviously, if you had a subgrant approved in your NOFO application, so for intermediaries, MSOs, and SHFAs, that's a big exception there. So, we've approved subgrants, and that's an exception. Also, if there is web-based education, you can subgrant that out as well if that's something that's part of your program, and then also for purchasing supplies and materials, things like that.

If you do have a subgrant that was approved in your application, you may make subgrants to affiliates who are not HUD-approved, but you need to require that the quality of services meet or exceed the standards for our HUD-approved LHCA's and that a parent agency is responsible for assuring that does occur.

Also, parents need to make sure that any changes to your network composition are sent to your HUD POC. You need to submit a written request to HUD to amend your branch or subgrantee list and any corresponding subgrant amounts. So, again, working with your POC is critical to make sure that everything in your network is up-to-date and on our end as well.

Also, keep in mind, for funding agreements, if you do have subgrants, you shall execute a written subgrant agreement with each subgrantee before disbursing any funds, and you must keep those copies on file and made available to HUD if we require seeing them. That often might happen at a performance review time but could happen at any time depending on the situation. So, please make sure that all of your documents are up-to-date.

Then, also keep in mind a grantee that has a subgrant is responsible for managing the daily operations of the program, and you agree to accept responsibility for your subgrantee's compliance with the provisions of your grant agreement with us. So, please keep in mind that our relationship is with you, and we will hold you responsible for any issues that might arise around subgrantees, so you must monitor the performance of your subgrantees and work on taking any appropriate action to resolve problems to make sure that you're in compliance with your grant agreement with us.

A little bit more on Article V, subgrants to affiliates and allocation of funds to branches. You must maintain copies of all your agreements and a written record on how you distributed your funds. So, documenting how you determined which subgrantee gets what amount of money, and then also you must list all of those subgrantees and branches, sub-allocations in HCS, and that's a screen process that you would work through with your POC.

Then, if you award subgrants competitively, keep in mind you must also document your process and notify the public if applicable. So, again, keeping everything documented and available in case HUD needs to take a

look at any of your documentation is really important in maintaining compliance with our program.

Now, we're going to jump forward to Articles IX and X with Joel Schumacher.

Joel                   Great. Thank you very much, Rebecca. Articles IX and X are my favorite articles in so far as they cover what needs to be done for you to receive your grant monies. I imagine they'll quickly become your favorite articles as well. So, let's take a peek at Articles IX and X.

Article IX cover cost. So, two things I want to note. Both come from the Uniform Guidance. First is if you wish to revise your work plan and/or budget be sure that you get prior approval under the circumstances that A) your grantee who receives more than \$250,000, and B) that the revision that you propose will compromise more than a 10% deviation of the direct cost that you've annotated, and that comes from Section 308.

Then, of course, Subpart E covers what costs are reimbursable. To be reimbursed, they need to be properly allocated in the event that they are shared or allocated direct costs, and of course, they must meet the

reasonableness standard. We also remind you that per Article IV of the grant agreement your activities must have been—the cost must have been incurred pursuant to one of the eligible activities that you’ve come to know and love since the FY ’18 NOFO was published.

Next slide. I’m not going to spend too much time here as my colleague, Tracy Badua, already mentioned indirect cost rates. As per previous years, you have several choices. You can take the 10% de minimis which requires no documentation. If you do have a negotiated indirect cost rate agreement from your cognizant agency, you can use that. State and local governments must have cost allocation plans, so you’ll know if that applies to you. Then, of course, should you decide not to be reimbursed for indirect cost rates at all, that’s your choice to do so.

Direct grantees, if you have a NICRA, please provide that documentation, and if you do not have a NICRA, you can select the 10% de minimis.

Also, there was a change to the Uniform Guidance in November of 2020. Previously, if you had a NICRA you could not revert to taking de minimis, but that’s changed. So, if you had a NICRA, and it’s no longer valid, you are allowed to go back to de minimis should you choose to do so.

As for subgrantees, these are separate legal organizations from the direct grantees that are receiving subgrants, and as they're separate organizations, they don't have the authority to use the indirect cost rate agreement that their parent has. So, they can submit copies of their own NICRA if they do have one, and of course, they are free to use the 10% de minimis, but the prime grantee cannot force the subgrantee to take de minimis in the event the subgrantee has a NICRA. These rules really haven't changed.

Next slide. Period of availability. As was mentioned previously, activity should have taken place during the period of performance which was April 1<sup>st</sup> of 2021 up until September 30<sup>th</sup> of this year unless an extension is granted. If you do need an extension as the end of the period of performance rolls around, get in touch with your POC to work that out.

Multiple sources of funding. Obviously, you cannot double bill for the same service or good. You are allowed to seek money for the same client in the event that the reimbursement you received elsewhere exceeds what the actual cost was, but this is determined by the actual cost. Apart from that, there's going to be no double billing, and you should already have adequate internal controls, and as was mentioned, financial management

systems that comply with these requirements to ensure that activities that are billed are not billed to multiple funding sources. That would be fraud.

Next slide. Burden of proof for the services rendered always rests with the grantee, and those records are subject to review. If a payment was made that was improper, it could be disallowed and subject to repayment using non-federal funds or as an offset to future awards.

We try to check those things up front during your grant act reporting, but some things are checked on the back end as well at the performance review, and at all times they are subject to review and to have supporting documentation. So, keep your receipts, keep your record books. Don't throw them away.

Next slide. So, that covers cost. Now, what you need to report. So, we have been requesting Grant Activity Reports, or GARs as we call them, in conjunction with each drawdown request. So, what needs to go into this Grant Activity Report for us to approve of your voucher and for you to get the money?



Next slide. Your grantee's name, address, grant number, start date for the reporting period, as is the case previously. In so far as the period of performance has preceded the dates of you actually receiving the reward, you can submit a draw that covers multiple quarters if you want to. So, definitely let us know what the reporting period is.

It has to be in increments of quarters, so no partial quarters. You can't submit for 3.5 quarter or 0.75 quarters, but you can submit multiple quarters especially for those that are seeking an initial drawdown in reimbursement for activities that took place over the past almost one year now.

Additionally, the hourly rate of your staff members and the number of hours that the staff actually saw or participated in housing activities, and I do want to note this year, in light of the certification requirement taking place, when you send the list of your counselors, your staff, the hourly rates, how many hours they've seen, we're also going to need the title and the individual's FHA Connection housing ID number that demonstrates certification because henceforth all reimbursement after the certification date needs to be done by a certified counselor, and we need to ascertain that your counselors were indeed certified.

So, please be sure to include the FHA Connection housing counselor's certification ID number, or your POC may reject the Grant Activity Report and ask you to add that.

I'll continue, for those who are seeking a fixed-fee methodology, that's very far and few between I believe perhaps 3 or 4 of our 200-ish grantees used a fixed-fee methodology, send that if you are using it. You'll have to itemize any expenses. As always, make sure that they're described in sufficient detail so your POC can ascertain the nature of the activity that you're seeking reimbursement for.

Required certification language, note that you can't copy and past the certification language from previous years. The certification language has been updated in light of the final rule, so make sure you're using the certification language found in the FY '21 grant agreement. That's the only certification that will be valid.

Obviously, to be reimbursed, you'll need to submit the 9902. That's a requirement of non-grantees. Everyone needs to submit their 9902s, and those who committed to getting the bonus for reverse mortgage default

counseling activities, there are certain specifications that are noted in the grant agreement and that were noted in the NOFA regarding what training they've done, how many reverse mortgages, clients they've seen, etc. So, those are special requirements as applicable.

Next slide. Additional, for intermediaries, FHSAs, and MSOs, you'll need to submit the oversight activity that you might have committed to in the NOFA. You'll remember that you can commit to doing up to five performance reviews of your network. That was in Chart D or E of your 9906 application.

So, if you committed to doing so, you'll need to submit copies of the 9910s and report on that. Obviously, the sub-allocations for your funded network, the cost of managing the network that you are maintaining, and then the SF-425. Then, of course, any changes in the composition or the size of your network, so those are the subgrantees and funded branches.

So, you'll do sub-allocations in the beginning during grant execution, but when you report, you'll need to annotate if there's been any change in that network.

Next slide. At the end, when all is said and done, you'll submit a final report which will be due within four months of the end of the period of performance. If you do not report, new updates to the Uniform Guidance require us to kind of rat you out to OMB. There's a system out there, [indiscernible], so, please make sure you submit your reports in accordance with the grant agreement by the end date because you don't want to be on Santa's naughty list.

Next slide. In your final report, provide a narrative which would indicate any problems, delays, or adverse conditions that impaired you or hindered you from meeting the objective, but also let us know any good news. We like to see kind of lessons learned as part of an after-action review. So, include both of those in your narrative. Also, those grantees that were unable to spend all their money by the end of the period of performance should let us know what went wrong.

Next slide. Finally, there's a certification for the final report. It's going to be different than the certification I mentioned earlier which is included in every Grant Activity Report. So, you'll have to have your individual authorized official signed certification indicating that the applicable close-

out activities per Section 343 have been completed. As I said, this is different than the certification that is in the GAR.

Next slide. Those grantees that are seeking reimbursement through a negotiated indirect cost rate normally at the time of grant execution you submit your NICRA, and it has provisional rates for future years. Obviously, you can only know the final rates when the time period has passed, so what we need at the end during grant closeout is a copy in which you've finalized the rates for any period in which you receive reimbursement of indirect costs.

We know that the final rates for NICRAs can sometimes lag, so that obligation exists even post-closeout. So, you submit your final narrative, final report, final drawdown. Nevertheless, you're obligated to send your final indirect cost rates. Once you've received them from your cognizant agency, send them along to your POC or other Office of Housing Counseling staff member that you can contact because in the past we have not always been as diligent on this, but this year it's definitely a point of concern. So, I just wanted to emphasize to those of you who received indirect cost rates through an agreement that we will ask for copies of the final rates.

Next slide. Compliance with NOFA obligations. In your NOFA application, you made certain commitments, things such as the size of your network that you plan on funding, performance reviews you're going to conduct of your network, how many counselors you have. We reserve the right to adjust the award amount and potentially require repayment in the event that you're unable to comply with the NOFA obligations.

That's written into the agreement, and my colleague, Rebecca, will address potential defaults, but this is something that is subject to recapture if you're unable to meet those obligations. Obviously, I'm sure you're going to do your best to meet the commitments that were made at the time of application.

Next slide. A little final bit of reporting, and again, this applies only to the intermediaries, MSOs, and state housing finance agencies. To the extent that you make subawards to your subgrantees that exceed \$30,000, and note it used to be \$25,000, it's now gone up to \$30,000. It's a little extra leeway. You're going to be required to input this into FSRs, the Federal Subaward Reporting System. Entities whose gross incomes are less than \$300,000 in the previous years are exempt from this reporting

requirement, and the report is due one month after you've made a subaward which is subject to this requirement. For anymore details you can check out the website yourself. It's FSRS.gov.

Next slide. That concludes my portion. I'm going to hand the baton back to my colleague, Rebecca Mclean.

Rebecca

Thanks, Joel. I'm going to touch briefly on a few more items. The first one is Article XI for payments requests. This is where you're going to find information on any general payment procedures and then also documentation of expenses.

Under general payment procedures, please keep in mind that HUD will only process payment requests upon receipt of an acceptable Grant Activity Report, so you cannot submit a voucher independent of a Grant Activity Report in our program.

Once you have had a Grant Activity Report approved by your POC, they will reach out to you and tell you to go ahead and make the voucher request in eLOCCS, and then also we require a signed copy of the voucher form to your POC, so usually that is a PDF of the screen, the 50080 HUD

form screen that the eLOCCS generate. All the sections of the HUD-50080 must be complete.

Keep in mind that you're going to need to look and make sure that the budget line item documentation is correct. Most of you will be pulling from 9500, but then also for the MSI initiative, 9525 making sure you're pulling funding from the right line item and from the right program area, CHC. Some of our grantees have HUD funding from other program areas, so that can get confusing if you're asking for the wrong program dollar amount.

Then, if you have any specific questions about LOCCS, there are voluminous user guides online, and you can go ahead and check them out on that link if you need more specific information on the LOCCS process.

Also under Article XI, documentation of expenses, these are the things that we need you to maintain documentation for direct costs, so things like invoices, receipts, canceled checks, documentation, personal expenses, client lists, etc. So, you would submit it to HUD upon request, and that's usually requested during a performance review, but if your HUD POC has any questions during review of your Grant Activity Report, we might also



request it, so please just keep that on hand and available in case HUD requests that for any reason.

Then, Article XIV, defaults and remedies. This is something we want to remind you of. Any delayed use of grant funds might result in default and recapture, and that would include failure to execute the grant before the end of the period of performance, and so we have sent out your grant packages and given you a date in mid-February to respond which is well before the end of the period of performance.

Most of you will absolutely comply with this, but we always have a few stragglers every year, so we want to make sure that you understand that if the grant does not get executed before the end of the period of performance that is a potential default, and then also failure to submit a drawdown request for any remaining funds within 120 days following the end of the period of performance.

As Joel mentioned earlier, the new CFR 200 requirement really kind of gives us not as much leeway as we've had in prior years, and we are really hoping to avoid having to report any agencies if we can. So, we are working on trying to make sure that everyone is submitting things within

120 days following the end of the period of performance, so keep that in mind as well. That is listed in your grant agreement as a potential default.

Now, I'm going to hand this over to Melissa Noe.

Melissa

Hi, everyone. Thank you, Rebecca. Again, this is Melissa Noe. I'm with the Office of Policy and Grant Administration. Today, I'm going to talk specifically about Article XXIII, which is the Historically Black Colleges and Universities, and Minority Serving Institutions article. So, this is specifically for the agencies that received a carve-out amount for this initiative.

Next slide, please. Again, this article is only applicable to grantees that received an award for this initiative. You can verify if you received this funding by looking at your 1044. I have a screenshot there, and you'll see there in the middle of the 1044 there's a larger section that's called description, Section 16.

If you look, just eyeball down, you'll be able to see if you received an award for this initiative. So, it'll say where that red box is, MSI, Minority Serving Institution initiative, budget line item 9525. For example, this

agency received \$5,000. So, that's where you're going to be able to check to make sure that you did or you did not receive this money.

Next slide. We're going to first talk about what you're going to need to do for the grant execution portion of this initiative. Going forward I'm just going to say MSI for partnerships. If you have any sort of partner with an HBCU or a Hispanic Serving Institution, they are all categorized as different types of MSIs, so just an FYI, I'm just going to use the term MSI when it comes to your partnerships.

The first thing that you're going to want to make sure you're concentrating on in the next few weeks is making sure that you have your Memorandum of Understanding or multiple Memorandums of Understanding ready to go to send to HUD. This is the MOU that you will have in place for each of your partnerships that will be funded with this initiative, so each of your MSI partnerships.

Again, this could be one or this could multiple depending on how you want to split the funding that you received and what you have provided us in your NOFO application.

At a minimum, what is required in this MOU? We want to make sure that you've listed the purpose of the partnership and the types of activities that you're going to be working with the MSI. That could be bullets or a paragraph, however you want to outline it to us, but it should be descriptive as to what you are going to do when you're working with this agency, and they are helping you with whatever type of housing counseling activities that they will be engaging in with you.

You'll also want to make sure that you let us know what the structure of the management and the people who are going to be managing this funding looks like between you and your MSI partnerships. You're going to talk through for us what these organizations' roles and responsibilities for the funding, the participation, and compliance is.

So, who is going to be the one managing the funding? Who is going to be the one ensuring compliance? We hope it's full agencies working together, but this has some information for us about how that's going to work.

Then, again, we would like to know how you're going to integrate your data sharing and how you're going to report, so what your reporting will

look like to us based on what type of program that the MSI uses or you use and how you're going to share it and make sure that information is safe.

Information on that will be very helpful for us because what I'll talk about soon is reporting for this is not just housing counseling activities, but it's going to be other more descriptive information about what types of activities you're doing outside of counseling or education with these partnerships, whether that's working on recruiting students, clients, whether that's marketing, things like that. How are you going to be able to share that information with us, and how are you going to share that between these two separate groups?

We are expecting that agencies will initiate these activities promptly, so we just want to put that in there because we know that it takes time to set up these MOUs. I know a lot of the agencies when they applied for this funding we got notes that they were already working on setting up the MOUs even though in the application we didn't need that. We just needed confirmation, a certification that you were going to be entering into a partnership.

Now we're at the point where we're like okay, once you have your MOU ready, let's get you guys started on working on these projects with programs because you'll see with this last bullet here we have to reserve the right to recapture these funds if we don't have an MOU in hand for your partnerships by March 31<sup>st</sup> of 2022.

This is really because we're already like well into the period of performance, and our fiscal year '22 money will be taken from us from Treasury at the end of September 30, 2022. So, we need time to make sure that the agencies are going to be using this money, and if not, then we want to be able to recapture that funding and be able to provide it to an agency possibly that has a lot of projects already going on for this MSI award.

So, by March 31, 2022 if you haven't provided us with any MOUs for this project, you're going to be hearing from us making sure that you know that we have the right to recapture this and see what's going on with your funding.

Next slide. You will need to submit a separate projected budget for this. So, what does that mean? That means that you're going to have to

describe to us how your partner MSI, how these funds will be used to further the objective agreed upon in your MOU for this project. There are some instructions in Article XIV-b about your projected budget.

So, everything looks pretty similar on how you submit a projected budget for this as you do for the CHC funding that's obviously [indiscernible] is separate from your MSI funding. So, you'll submit the same sort of information. We like to see things laid out and the types of eligible activities, the eligible categories that we have, counseling, compliance, things like that.

We want to see that listed in your budget, but we also want to make sure that we have a better understanding of what types of activities are actually in those categories that you give us. So, you'll see in this projected budget section in the grant agreement that we ask for a narrative, too, so if you are a parent agency that received this money.

We would also like to see similar to how your subgrantees now give us itemized budgets for their CHC funding, we also want to see the itemized budgets for your MSI partners. So, for parent agency, if we didn't see those itemized budgets, what we would just see from your end is most

likely who you're funding. We would see a list of maybe two or three, if you have three relationships with MSIs that you're funding, we would just see that money being passed.

We want to see what's broken down, how that money specifically to each of the MSIs is broken down and suballocated and what types of activities are going to be happening, what the budget is going to look like, itemized for each of the MSIs.

Just a note here that that last bullet, we also suggest that you keep your MSI award—okay, so when you're in HCS first of all, and you're submitting your budget like you do, this is separate from submitting an Excel budget or a paper budget in PDF that we get as point of contacts for your funding. You also have to go into HCS and update that for your budget.

Well, since this is a specific initiative that doesn't align exactly with our housing counseling program and how HCS the system is set up for that, we suggest for intermediaries, MSOs, and state housing finance agencies that you keep your MSI award in that category that I've circle there, the



cost of managing a network, since you won't be able to further suballocate that funding down to an MSI level because MSIs aren't listed in HCS.

I don't believe any of the MSIs that you guys are working with are also approved housing counseling agencies, so they're not listed in HCS. As you know, as a parent agency, when you're suballocating your CHC funds there's another screen that shows each of your subgrantees that you're tied to in HCS.

Obviously, these MSIs aren't going to be listed there, so what we suggest that you do is keep that money separate, keep it in that cost of managing a network pot, and don't move it because there's really no place to move it. We didn't update the system for this specific funding initiative this year.

Okay, next slide. Alright, so moving on then from grant execution requirements, we're going to talk about what's in the grant agreement for Grant Activity Reporting requirements. This is for your GAR. This is for when you are submitting the Grant Activity Report to be able to be reimbursed for the activities that you and your MSIs have done.

The first thing is you must indicate the amount of funds expended and the relevant category of eligible activities carried out pursuant to this funding initiative. So, this is exactly like when we ask for you when you provide us the activity report for the CHC funding. We say, “Okay, let’s have some categories of activities did you do to be able to bill us for these activities?” A lot of times a lot of agencies it’s salaries because of counseling and education, for example. So, it’s very similar, same thing, but it will be broken up specifically for the MSI initiative.

You must also include a brief narrative describing the progress and challenges in achieving performance goals and objectives described in your NOFO application. So, this is a little bit more than you do for a regular CHC Grant Activity Report. We’re asking you to also give us information for each one that you provide us because we want to be able to know how it’s going, what your challenges are, what maybe have you switched up since you provided the NOFO application a few months earlier.

This is a new initiative, not just for you but for us, too, and we really want to take as much information in as we can from you guys, so we know how we can improve this for the future.

Just a note because we've already gotten some questions on this, when it comes to reporting counseling and education activities, we understand that not all agencies may be doing a plethora of counseling and education with this MSI funding. It really depends on what your relationships with your clients and what the scope of work looks like with you and your MSI.

However, if your agency is providing one-on-one counseling, or if you're working with an MSI partner who is providing workshops that fit into our HUD-approved activities, you can report this on your 9902, and obviously we want you to. We want you to get credit for that. So, just know if there's any counseling and education going on that fits our requirement, please make sure that you're recording that stuff because you want to make sure that you're getting credit for it.

Next slide. Finally, for the final report, the following is required. You must include everything required in your Grant Activity Report, so on the slide just before this where I talked about if you're billing in the final report, you're going to send us what the amount of the funds were and the relevant categories, eligible activities that were carried out pursuant to the

funding, you'll describe to us again a brief narrative describing the progress and challenges, things like that.

Then, in addition to that for the final report, you will also describe the extent to which you and your partner or partners were able to fulfill the program objectives described in your original NOFO application including outcomes and lessons learned, and in the grant agreement, I didn't have much space to put it on this slide, but we have suggested types of outcomes that you could discuss if you're trying to think through what you want to capture for this funding depending on what your scope of work looks like with your partnerships for this.

Some outcomes could be change in financial literacy, change in knowledge of housing-related rights, updates on credit scores, information on securing safe, affordable housing if you were able to help any clients be able to do that through this. It could be information about providing help with off-campus housing, information like that.

So, there's a list in your grant agreement that talks about what types of outcomes you could look at when you're describing to us how things went with this program.

At a minimum with this description, besides the outcomes that I listed and how you can incorporate them into your description, please address the following five topics. How you measures outcomes on the target population, again the examples are listed in the grant agreement; how the institution, 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 receive second-year funding; and how HUD should also refine and update this funding initiative.

We'd love to get as much information from you all as we can about this, but in the future if this is something that we can continue to pursue that we would be able to help to shape better and improve on the objectives of this program since, again, this is our first year running it, and a lot of this was us thinking this is the way to go, but we'll have to see what we get back information-wise from the grantees themselves.

Finally, one point, this final report just like the CHC period of performance, the MSI period of performance is the same. So, this final report is due at the end of the period of performance. If you need an extension, talk to your point of contact, but just be aware that this period

of performance aligns exactly with the period of performance for your comprehensive housing counseling funding.

Next slide. Now, I'm going to pass it back to Tracy Oaks-Ross who is going to discuss some additional resources for you all and talk through any questions that we received that we want to hit home again and respond to and things like that. Tracy, back to you.

Tracy O.

Thank you, Melissa. Thank you to all the presenters on today's webinar. This does conclude the presentation portion of our webinar, but before we answer a few questions, please go to the next slide for me.

This is just a reminder that the webinar materials will be posted on the HUD Exchange in the webinar archives and then also what we've provided here on this slide is a link to the 9902 online toolkit, so again, a couple of resources here for your convenience.

Next slide. Great. So, let's see. It looks like we have a little bit of time, so let's see if we can answer a couple of question. I'm just going to check the question box that we have here. It looks like we've actually answered most of your questions today. There's a couple of questions, it seems we

did receive a few questions regarding the period of performance. So, let me go on and provide a response to that.

I think the first thing that we want to emphasize here is that, again, the fiscal year '21 NOFO is a two-year NOFO, so again, that means that anyone was successful under this NOFO will be eligible to receive funding for fiscal '22 funds through the expression of interest process. I think it's important for us to point out and to note that you may see a different award amount depending on the appropriation and depending on some other factors for that NOFO.

Also, it's important to remember that because it is a different appropriation, there will be a new grant agreement, and it will have its own period of performance. I think we did receive that question whether the period of performance would be the same or when it would start for the fiscal year '22 NOFA. So, that has not been determined yet, but it will be a different period of performance from the fiscal year '21 NOFA.

The second thing I think it's important to note again is that this is a cost reimbursement grant, so you can go back to the start of the period of

performance which is April 1<sup>st</sup> for this NOAFA and bill up to September 30, 2022.

As we mentioned previously at the start of this presentation, again, we are allowing grantees to request reimbursement prior to the start of the period of performance, but again, we will not allow you to go any earlier than October 1<sup>st</sup> of 2022. So, again, if you've indicated as such in your NOFO, please reach out to your HUD POC if you do need some additional guidance on this.

The second question that I think I want to address is around the 9902. Again, we've received some questions on the 9902 projections. We've received them here during this training. We've also received some through the housing.counseling mailbox, and so as many of you are aware, we have a newly-revised 9902 form. So, if you are having some issues with your CMS or with HCS in entering your 9902 projections, we are aware of that issue.

Just know that we are working to resolve it as quickly as we can, and in this presentation, we did provide some additional guidance and tools and resources that you all can provide your projections with your grant



execution packages. We encourage you all to do so, so that we can have a timely grant execution process, and again we appreciate your patience while we work through and resolve these system issues.

Again, we did receive another question about the HCS, so again, please use the resources provided in this PowerPoint presentation to submit your 9902s using the PDF form included as part of your grant execution package. This will allow us to continue to proceed through the grant execution process timely.

Let's take one more question here. Someone did ask who the grant package is emailed out to. The contact information that we use is listed on your SF-424. So, if there's a different person, or the person is—we take a look at your SF-424 and the contact information in HCS, so it's really important that you all continue to update your contact information in HCS because we do use that information when we're preparing your packages to send out contact information and documentation to your agencies.

I'm just checking to see if there are any other questions that we did not have a chance to get to. It looks like we have some repeat questions in the box that we did answer for some other folks that are attending the training.

Next slide for me, please. Again, this is just a reminder that the webinar will be posted, again, on the HUD Exchange. Then, you can also receive credit today by following the instructions here on this slide, which I'm sure many of you are familiar with.

Next slide. In terms of your feedback, we'd love to hear from you. If you do want to provide us some feedback on today's presentation, please do so in the question box. Again, the feedback that you provide us in the sessions is very valuable to us because as many of you know who have been with us for quite a while, the feedback that we receive from you all we do take into consideration when we're developing our NOFO competitions every year.

So, please, we really do look forward to reading your feedback and your comments and your questions because it does help shape our NOFOs each year. So, please do not hesitate to reach out to us and provide that really valuable feedback.

Next slide. Again, lastly, you can find more information and resources provided by the office of housing counseling, again on our HUD

Exchange, and of course you can always email us at the housing.counseling@hud.gov mailbox, and someone will get back to you with a response as quickly as we can.

So, again, we do receive a lot of questions through our mailbox, and we do try to turn those responses around with 24 to 48 hours, so feel free to email us any additional questions that you may have after this presentation or any questions that we did not get to today. We will reach out to those folks and provide you all a response.

Next slide. Okay, so I think I'm going to turn this back over to Ginger.

Virginia

Thank you, all, for attending. As I said, we will post the recording and the PowerPoint on the HUD Exchange page, and I'll let you know when we have done that. Again, thank you for attending, and good luck on your grant package. Have a good day.

Moderator

That does conclude our conference for today. Thank you for your participation and for using AT&T Conferencing Services. You may now disconnect.