

## Transcript for HOPWA Office Hours: CARES Act Reporting Requirements 12.14.20

**[00:00–01:07] Jonathon Sherwood:** Okay, good afternoon, everybody—or morning as the case may be, depending on your location. We'll go ahead and get started; folks are still coming in to the webinar room, but we also want to respect everyone's time and get started with this presentation so that we make sure we have a more than enough time on the other side to answer any questions that you might have. Thanks for joining this webinar sponsored by HUD and the office of HIV/AIDS at HUD. This is the updated HOPWA CARES Act Reporting Requirements and Guidance webinar, one in a whole series of CARES Act-related webinars that have been coming out to HOPWA grantees and their project sponsors over recent months, including a number of them in recent days. Next slide, please.

**[01:08–01:11] \*Pause\***

**[01:12–02:58] Jonathon Sherwood:** So, I'm Jonathan Sherwood from The Cloudburst Group. We have a number of presenters on today who are available for questions as we go. The Cloudburst Group is a technical assistance provider working with the Office of HIV/AIDS Housing to provide technical assistance and support to HOPWA grantees and project sponsors around the country. We also, on a separate contract, provide some HOPWA annual performance reporting support to the Office of HIV/AIDS Housing in relation to the submission of grantee APR and CAPER reports so you may be familiar with some of us from Cloudburst Group as well as our partners at Collaborative Solutions who work with grantees on those data submissions on an annual basis. So, on the call today, we have: myself; we have Heather Rhoda, who's a senior analyst with Cloudburst Group; Steve Ellis, who's also a senior analyst; and Morgan Stephenson, a junior analyst. So, again, a number of us who work with OHH to provide support the HOPWA grantees. From HUD's Office of HIV/AIDS Housing we have a few folks who are available for questions as we go later on in the—in the presentation, including: Claire Donze, program and management analyst; and Stefanie Rhodes, community planning and development specialist. So, welcome and thank you everybody for joining us. Next slide, please.

**[02:59–03:01] \*Pause\***

**[03:02–03:38] Jonathon Sherwood:** So, the objective for today: we want to provide you with updated guidance from the Office of HIV/AIDS Housing regarding the reporting requirements for HOPWA CARES Act formula and competitive grant awards. So, that will be our sole focus. There been lots of other webinars and other information coming out about other aspects of the CARES Act funds in spending and implementing that program—we'll just be focusing on the performance and financial reporting. Next slide, please.

**[03:39–03:41] \*Pause\***

**[03:41–05:09] Jonathon Sherwood:** Quick overview of our agenda and what we'll be covering: we'll do some review of standard HOPWA reporting requirements—these are reporting requirements that are requirements that HUD has for HOPWA grantees but, by extension, the grantees have those requirements for their project sponsors and any contractors that they work with—so, that will be...we'll review financial reporting as well as the performance reporting and the APR and CAPER reports; we'll be looking at what is...additional information related to HOPWA CARES Act reporting; and we'll also look at some other administrative reporting

requirements related to the HOPWA CARES Act awards as well as HOPWA awards, in general; and then, hopefully, leave plenty of time for your questions and answers of which we expect there will be a few; and then, finally, we'll have a number of slides at the end with resources and reminders out of the Office of HIV/AIDS Housing. And, just a reminder that this presentation is available as an attachment in the webinar and will be available to you for your use after this session. Next slide, please.

**[05:10–05:11]** \*Pause\*

**[05:12–07:25] Jonathon Sherwood:** —Wanna do a quick review of some basic terminology since not everyone...we have lots of folks on this call—not everyone is necessarily been working with the HOPWA program for a long time or there may be terminology used related to systems and documents that are not systems or documents that you typically interact with. So, these are a few that we wanted to pull out because we will be referring to them throughout. So, in particular, when we talk about HOPWA-CV, we're talking about the HOPWA awards out of the 2020 CARES Act for formula grantees. You'll also see reference to HOPWA-C-CV—so that's HOPWA Competitive...HOPWA Competitive awards for the competitive grantees out of the 2020 CARES Act. You'll also...we'll talk about IDIS, which—some of you will be likely familiar with but many of you will likely not be familiar with—stands...IDIS stands for the Integrated Disbursement and Information System; it's HUD's portal for grantees to use (including HOPWA grantees) to report project-level spending and drawing down funds for reimbursement, so it is the...it is the portal that is used by grantees to basically seek reimbursement for project-level expenditures and it plays a critical function in the information gathering that we'll be talking about. CAPER stands for the Consolidated Annual Performance and Evaluation Report—that's the annual report that's completed by formula HOPWA grantees, and APR stands for the Annual Performance Report and that's the annual report completed by competitive HOPWA grantees. So, keep those in mind as we move on through. Next slide, please.

**[07:26–07:28]** \*Pause\*

**[07:28–11:25] Jonathon Sherwood:** So, we'll jump right in; I'm gonna start with some information about financial reporting and then we'll get to the performance reporting. So, when we're talking about reporting overall, it's not just the annual reporting at the end of the year that is...focuses on your performance, your outputs and outcomes, how many households served, and that sort of thing; we're also talking about the financial reporting which is ongoing throughout the year. So, as project sponsors generate invoices and send them to the grantees, the grantees pay those invoices. The grantees report that expenditure information to HUD through the IDIS system, and that's how they are, in turn, reimbursed by HUD for those same activities. So, financial reporting is ongoing, all the grantees use the IDIS system to report those expenditures and draw down funds. This is a general requirement: all spending reported by grantees to HUD via the IDIS system is always connected at the dollar level of project-level to particular HUD awards, meaning that sponsors and grantees must track all spending at the funding source level. This is called, in HUD-speak, grants-based accounting. So, that means that, for the grantee, every time they report a dollar spent to HUD by one of their project sponsors, it is always gonna be attached to some fiscal year award that they receive from HUD for the formula grantees and, for competitive grantees, that dollar spent will always be attached in IDIS to a particular three-year competitive renewal award that they are spending from. So,

dollars are always attached to awards and that's tracked through the IDIS system—and that's not new—and it's an important feature. All spending tracked in IDIS requires the new (as of last December—about this time last year) the new approximate date cost incurred data element. This data element is used by HUD to not just track—the IDIS system already tracks the date that the grantee draws down funds and reports those expenditures to HUD. What the approximate date cost incurred data element does is assign that cost for a particular date range and that helps HUD attach that spending to a particular reporting year. So, that is a built-in feature in IDIS that grantees who are respon—grantee personnel who are responsible for using IDIS will be familiar with that: it's been in place for about a year. So, that's still the case, and then IDIS status: that is based on, as I said, invoices sent from the sponsors to the grantees in the first place. We included a link in this for more information about that approximate date cost incurred functionality from...that was put out last December by HUD through the HUD Exchange. So, just a reminder: it's only the grantees who are interacting with IDIS, not project sponsors. So, if you're a project sponsor and on this call, this may be pretty confusing, but just know that this is really just the system that the grantees use to draw funds. But it's an important part. Next slide, please.

[11:26–11:28] \*Pause\*

[11:28–12:53] **Jonathon Sherwood:** So, with the CARES Act and financial reporting—what do you need to know? What's different? That's basically what we're here for today. To reiterate: project funds, all expenditures, always need to be attached to a particular award—that's no different for the HOPWA-C...sorry we have a typo here, it should be HOPWA-CV and HOPWA-C-CV funds...they, like all other HOPWA funds, need to be specifically identified in the IDIS system when the grantee is drawing down funds, that that is the award that's being drawn from. And what's different about the HOPWA-CV and HOPWA-C-CV awards is that their specific unique identifiers in IDIS that were set up just to create tags for these 2020 CARES Act awards. And so that's...that's there—that graphic demonstrates that for you using the case of Baltimore awards and there's a link for further information about setting up and drawing down funds...CARES Act funds. And that document's on HUD Exchange. Next slide, please.

[12:53–12:55] \*Pause\*

[12:56–14:17] **Jonathon Sherwood:** Okay, so, getting to, I think, more what folks are probably wondering about...so, with the performance reporting, the baseline for that: What is the case regardless of the CARES Act funds? All grantees submit Annual Performance Reports to HUD within 90 days of the end of their award's operating year. All project sponsors are...should be tracking rent-based outputs—that is things like households served and outcomes such as housing outcomes—and reporting it to the grantee and the grantee compiles...across their project sponsors, compiles their information into a single annual report. Formula grantees use the CAPER fund with the CAPER form with the OMB form number 40110-D to report. And the competitive grantees, as I said previously, use the APR form that has a different OMB number to report their annual information within 90 days after the year's end. So, that's where—that's our starting point that folks are likely familiar with already. Okay, next slide.

[14:15–14:22] \*Pause\*

[14:23–16:34] **Jonathon Sherwood:** This is an additional—this is not necessarily CARES Act-related; it just happened to coincide with this updated guidance: just last week the Office of HIV/AIDS Housing received an extension to the forms—those APR and CAPER forms—that are

used to collect your annual performance reporting. Sharp observers (and we certainly get asked about this periodically) may have noted that the forms were due to expire at the end of next January in about seven weeks: January 30<sup>th</sup>, 2021 (or 31<sup>st</sup>; I forget how many days in January). So, in the routine course of things, HUD had requested an extension of those so there are new forms published on HUD.gov that you all should—grantees and their project sponsors can start using for reporting APR and CAPER data to HUD with that new...new date on them. In terms of guidance regarding that, grantees can use these forms right away and you have to start using them for reports that are due on or after February 1<sup>st</sup>, 2021 'cause, as of the end of January, the other forms with the other date would have expired. There are some very minor technical changes in the documents; there are no changes to the...the data actually collected in the form, so there should represent no interruption to how grantees and their project sponsors collect and report. Just pay note to those states and where to find those new forms. And, again, these links are in the presentation and you'll be able to access them after this webinar. Next slide, please.

**[16:35–16:38]** \*Pause\*

**[16:38–21:10] Jonathon Sherwood:** Okay, what's different for the HOPWA CARES Act, the HOPWA-CV, reporting for formula grantees? So we're gonna talk about formula grantees' annual performance reporting first and then we'll move on to the competitive grantees 'cause there are slightly different guidance for each. So, for formula grantees' performance reporting, you'll continue to use the HOPWA CAPER document (the number that we just gave out with that link). So, it is still just annual reporting—that has been a question that we've received periodically through the Ask-a-Question desk as well as through our communications regarding the submission of reports on ensuring that it's annual. For some of the other CARES Act programs, some of the reporting is on a different period; it's quarterly for ESG programs. For HOPWA. The reporting using the CAPER document will just be annual reporting only, so there won't be any separate reporting. That's the first point; here's the big headline: for formula grantees, at the end of your operating year, you'll submit a single CAPER report on your usual operating year schedule covering all activities from both years' quote unquote “standard HOPWA funds” as well as your HOPW-CV grant in that 12-month period and compile that into a single CAPER report. So, for example, if you're a grantee that has an October through September operating year and your...this next fall in 2021 when that operating year ends, you would take performance reporting information from both your regular HOPWA funds as well as your HOPWA-CV grant, combine it into a single award report, and submit that 90 days after the end of next September 2021, if that makes sense. So, combined award due 90 days after the end of your existing operating year. So, for formula awards the start date of your formula...the date you actually signed the HOPWA-CV award with HUD is not relevant to when you start reporting on it: you fit it into your operating year. So, that's gonna make for data that...where you'll—you'll have those HOPWA-CV awards starting up in the middle of the year; most likely for everybody it's gonna...those awards will have started performance and spending and implementation sometime during the course of an existing grantee operating year—you will just capture that partial year data in your CAPER report and add that to your other award data at the end of the year and combine it into a single report. Obviously with different awards and different project sponsor contracts out there, there—there is additional opportunity for duplication across a grantee's award and for the reporting and this is standard guidance for all CAPER reporting and APR reporting as well to the extent feasible and possible, aim to de-duplicate that

information so that—that if—if you have the households count...we're always—HUD is always asking in those CAPER reports for you to try and de-duplicate across the different types of housing assistance, and that's no different here, but it'll be combined into a single report. Next slide, please.

**[21:10–21:13]** \*Pause\*

**[21:13–24:13] Jonathon Sherwood:** So, some formula grantees, as we said the—the start date of your HOPWA-CV award does not impact when you report on it, so you're gonna have your part...your data. There are grantees who have already started spending HOPWA-CV funds and recently submitted CAPER reports. Their years ended but they may have already, before that year ended, started spending on their HOPWA-CV funds—they did not have this guidance in hand about when to include that information in their prior recently submitted reports. If that's the case, HUD is not asking anybody to go back and submit revised CAPER reports; what they are asking is that grantees strive to capture that missed data and add that to your next year's HOPWA CAPER report, so that's an additional layer here. Obviously, these are...these may make for some challenges and complications to try and track that but, I think, as a grantee—for the formula grantees—if you look at when your report was due, when you started your (you and your project sponsors) started spending on the HOPWA-CV and see if there was some missed data in that...in that time frame and then, again, that would roll forward in the next year's report but HUD is not asking anyone to submit a revised report. There are likely a second set of grantees whose years may have just ended and they are in the process of compiling their report and it's not yet been submitted: HUD is asking that those grantees adopt this new guidance and strive to add that HOPWA-CV data to the CAPER that may be in process of being developed and collected from project sponsors for submission. And then, of course, moving...looking forward to grantees who are...have years ending in coming months and not until the—don't have reports due until the spring...late winter/early spring and through next summer: from the start, ask your project sponsors to submit performance data for both awards so that you can compile them into your single CAPER report at the end. Okay, next slide, please.

**[24:13–24:16]** \*Pause\*

**[24:17–26:31] Jonathon Sherwood:** So, for HOPWA-C-CV performance reporting for competitive grantees: we'll start with the same guidance. I've used the existing HOPWA APR document there is no—for either formula or competitive at this point—there's no differing reporting tool to use so use the existing APR document. But, unlike with the formula grantees, competitive grantees really work on a very different basis that...not on set operating years but really the reporting is always tied to when that date of that particular award was signed, and so competitive grantees who received HOPWA CARES Act awards in addition to their existing HOPWA competitive award...they will be reporting those separately than those other one or more existing HOPWA competitive awards that the grantee might have. And for that reporting, it will be timed (as the last bullet said) it will be timed to the HOPWA-C-CV report C-CV program year, 12—which is 12 months plus 90 days after the grant start date. So, for competitive grantees, there will be 2 separate tracks of reporting. You'll continue to fill out APR reports for the...for the competitive awards that you already had in place before the CARES Act. You will complete an additional standalone HOPWA report for each of the HOPWA CARES Act awards that you may have. I say “for each” because there are some competitive grantees who have multiple competitive awards. Next slide, please.

[26:31–26:35] \*Pause\*

[26:35–26:58] **Jonathon Sherwood:** So, that [inaudible] turn over and I'm sure that there's likely questions piling up about all of that 'cause it's a good bit to absorb, but I'll turn it over to my colleagues at HUD, to Claire and Stefanie to present about this additional information.

[26:58–27:02] \*Pause\*

[27:02–31:44] **Claire Donze:** Thanks, Jonathan. So, hi, everybody: This is Claire Donze with the Office of HIV/AIDS Housing, and I just wanted to give some quick reminders about some other reporting requirements outside of IDIS financials and the APR and the CAPER. This slide is to serve as a reminder about the existing government-wide FFATA reporting requirements and, again, this is an existing requirement, but we are emphasizing this FFATA requirements during this webinar because HUD is planning on leveraging the FFATA reporting to further fulfill some of our departmental CARES Act reporting requirements. So, this is just a reminder about what FFATA is: it is the Federal Funding Accountability Transparency Act and FFATA requires information about federal awards and that they be maintained in a single searchable website that's available to the public. So, FFATA is actually a federal government-wide requirement, not just a requirement for HOPWA grantees or HUD grantees. And FFATA as the act...it was enacted in 2006 to collect information from prime recipients about executive compensation and about subrecipient and contractor awards. So, FFATA requires prime recipients—or, in our language, the HOPWA grantee—to electronically report their subrecipient or project sponsor and contractor award information. The system with which FFATA requirements are recorded is called FSRS or the FFATA Subaward Reporting System, and this is the system used to capture and report project sponsor and contractor awards and executive compensation. Reporting in FSRS is expected to be submitted one month after the project sponsor contractor funds have been awarded and, once the grantee has submitted the project sponsor or contractor data, there's no further reporting deadlines for FSRS: so it's just the one-time reporting. And because the FFATA is a government-wide system, it's not a HUD-specific—or, sorry, FSRS is NOT a HUD system because the FFATA is a government-wide requirement. So, any technical questions you might have about FSRS should be directed to the federal service desk and you can find that information on FSRS.gov as well as how to get an account if you don't have one. And finally, for a much more detailed and thorough look at the FFATA and FSRS requirements, HUD's Office of the Chief Financial Officer just conducted a training on FFATA and FSRS requirements for HUD grantees and that training was recorded and can be found at the link of the bottom of the slide or also on CPD's resources page on HUD.gov (and CPD stands for Community Planning and Development office, which is the office under which the Office of HIV/AIDS Housing exists in HUD). So, if you need more training on FFATA and FSRS, that is a very thorough training that outlines all of the requirements for that. And there are particular milestones or requirements depending on your award amount on whether or not you have to submit FFATA reporting or not, so please reference that training for more info on exactly which criteria are...a grantee needs to meet in order to meet the FFATA reporting requirements. And that's all I had for that slide. Next slide, please.

[31:44–31:52] \*Pause\*

[31:53–32:10] **Jonathon Sherwood:** Thank you, sorry, I was muted. So, with that, I know we ran through a good bit there and we do have folks who've been monitoring any questions that

are...have come in through the chat, so we will open up to...questions.

[32:10–32:14] \*Pause\*

[32:14–32:25] **Steve Ellis:** So, Jonathan, one question that has been asked is: are there any timing...timeliness standards for how often grantees must draw down funds from IDIS?

[32:25–32:28] \*Pause\*

[32:28–32:39] **Jonathon Sherwood:** I will defer that one to our colleagues at HUD to express the standards there are with the regularity.

[32:39–32:40] \*Pause\*

[32:41–32:47] **Claire Donze:** Yes, this is Claire with OHH again, and grantees are required to make draws from IDIS not less than quarterly.

[32:47–32:52] \*Pause\*

[32:53–33:03] **Steve Ellis:** Great, thank you. Another question had to do with...do HMIS & IDIS communicate between themselves?

[33:03–33:06] \*Pause\*

[33:06–34:52] **Jonathon Sherwood:** I'd be happy to answer that one. \*Coughs\* Excuse me, this is Jonathan. They do not. They are not set up to communicate. They're two...quite different. With HMIS having been raised by that question, though, I will note that there...over the summer when the CARES Act was passed, there was a push by the...out of the SNAPS office that administers that really isn't responsible for the HMIS framework to update the user manuals for different programs for anything relevant out of the CARES Act so there were updates made to the HOPWA HMIS user manual that were published over this summer. So it is the case that CARES Act funds are trackable at the project level for HOPWA projects that—for any grantees and sponsors that use HMIS. You can specifically track a project as with HOPWA-C-CV as the funding type in HMIS. The systems in and of themselves don't communicate but they...HMIS has been updated to be able to track HOPWA CARES Act funds.

[34:53–35:01] \*Pause\*

[35:01–35:17] **Steve Ellis:** A question has come up a few times for the formula grantees who fill out the CAPER: Is the expectation that they will be reporting on households and expenditures together or will they need to separate those on the one CAPER?

[35:17–35:23] \*Pause\*

[35:24–36:58] **Jonathon Sherwood:** Well, I'm happy to answer that, and Claire and Stefanie correct me or update it if anything I say is inaccurate but the...it would be, in using the current form, all...there are just...and this would be the case for, well, for the formula: there's not—there's just the single expenditure areas (you know, totals for TBRA, totals for each of the different activities) there isn't...it does not collect at a breakout level. So, even for current reporting, grantees are reporting...quite likely are often reporting expenditures that may be in IDIS attached to more than one award but on the CAPER report it's combined into a single dollar amount. It's that same logic for the...reporting the CARES Act expenditures as well. It's just in—for the purposes of the CAPER—just considered another type of...another funding source and it's always the case that formula grantees are likely often aggregating cost and outputs that are attached to multiple different years at the spending level but are aggregated in the CAPER report and the CARES Act funds are no different, so it's all combined.

[36:58–37:02] \*Pause\*

**[37:02–37:20] Steve Ellis:** Thank you. There's a couple of questions about the approximate date cost incurred; so, the most common question is: How do grantees apply the approximate date cost incurred to previous years' funds or allocations?

**[37:20–37:23] \*Pause\***

**[37:24–38:52] Claire Donze:** I can take that one, Steven. So, the approximate date cost incurred functionality in IDIS that was added this time last year: it is actually an option that pops up when you are making a draw from IDIS, so if this question is referring to making a draw in IDIS for an activity that occurred in a previous 12-month reporting period, you would just put the approximate date that that cost was incurred to associate that date with your draw. So, if it was a...if you were doing some, I don't know, receipt clean-up or something and you realize that there was a draw that was not made within the reporting period or your 12-month reporting period, you just...can put—you can backdate that draw by putting the approximate date that that cost was incurred even if it is...even if the approximate date is the previous program year, if that makes sense.

**[38:53–38:54] \*Pause\***

**[38:55–39:44] Jonathon Sherwood:** Hmm. Yeah, we've seen—in polling reports with...that has the approximate cost incurred information included in it—seen grantees using it just for that (presumably) just for that purpose of...they are cleaning up or have some, perhaps some aged invoices to get into the IDIS that are from a prior year or prior years and are choosing those earlier dates as appropriate. So, it won't affect your ability to draw it down, it more...just helps HUD understand kind of what...for the draws that are happening in IDIS, kind of what time ranges, what operating years they are associated with.

**[39:45–39:51] \*Pause\***

**[39:51–40:22] Steve Ellis:** I think...there's a few questions that can sort of be clumped together and so I'll try to word this together. So, while formula grantees will be reporting on all of their information on one form, there seems to be some questions about tracking that and should that be tracked separately regardless of what tracking system they might use—whether that's HMIS or another system. Could someone address the tracking of regular from CARES Act funds?

**[40:22–40:27] \*Pause\***

**[40:28–43:10] Jonathon Sherwood:** I can—I'm happy to take a first pass at this and Claire, again, if you have anything to contribute, please do. With it in...one way to think about the CARES Act funds is it's another...it's another type of award; it's very similar in a lot of ways to the annual awards that you get. I mean, again, it's...most formula grantees are often spending out of more than one year at once because they get an allocation every year and it takes multiple years to spend those down. Or it's unlike the competitive grantees where they're spending kind of on a serial base that they spend one close it out then move on to the next award. So, in that perspective, the HOPWA-CV funds need to be tracked at the same level that all FY funds need to be tracked; it's always the case that, for all the draws in IDIS, it's always going to be every project that's set up in IDIS is attached to a particular funding award that the competitive or the formula grantee has. And the HOPWA CARES Act just is an additional...additional year, as it were, to track. But all, really, all years—all the FY awards kind of require the same level of tracking that the HOPWA-CV plans require. So, in that sense, it's not...it's not a...it's not a change, it's just something we're emphasizing to be tracked separately. For the...for the CAPER report: again, it's all going to be aggregated, so (and HUD



could speak to this, if-- \*inaudible\*) there's opportunity in the narrative sections of the CAPER report to offer some depth of information about if there's..what might be noted about the...what, in particular, might have been done with the HOPWA-CV funds that were reported in that report, but the report itself isn't going to—doesn't ask for any separation. At the administrative level, it does need to be separated, but that's always the case for all...all the different awards that the grantee is spending off and that the project sponsors are invoicing based on. This is just another award to be added to that. It needs to have that level of tracking.

[43:10–43:13] \*Pause\*

[43:13–44:37] **Claire Donze:** Thanks, Jonathan. And just another reminder: the reason that level of tracking is required is because, in IDIS, draws are made by particular grant. So, you also...that—just a reminder to make sure that your IDIS grant setup is conducted correctly, both for your CARES Act awards and your HOPWA awards because specific draws are made, you know, from activities on specific grants. And that's information that we use to, you know, just view financial tracking and spending. So, just a reminder to also make sure that your IDIS setups are correct for all of your...for the financial and IDIS side of things, too. But, again, that's the IDIS side: draws are made by activities connected to specific grants but, when you get to the formula CAPER, all of those expenditures are reported in the aggregate.

[44:37–44:43] \*Pause\*

[44:43–44:54] **Heather Rhoda:** Claire, that—this is Heather—that includes the household...number of households served, right? You're gonna be aggregating everything in the CAPER?

[44:54–44:57] \*Pause\*

[44:57–44:58] **Claire Donze:** Correct. Yeah.

[44:59–45:06] **Heather Rhoda:** So, they're going to be completing the CAPER using the same tables as they normally would have before.

[45:07–45:13] **Claire Donze:** Yeah, so the CARES Act information will now be included in those tables with the...at the aggregate level

[45:14–45:15] **Heather Rhoda:** Great. Thank you.

[45:16–45:24] \*Pause\*

[45:25–45:38] **Steve Ellis:** So, to jump over to the HOPWA competitives: is there any information about what the HOPWA competitive grantees are going to be required to fill out to report their CARES Act?

[45:38–45:40] \*Pause\*

[45:40–46:15] **Jonathon Sherwood:** Competitive grantees and any project sponsors or contractors that they work with...the grantee will be using the same APR form as is currently used for other competitive awards. So, there's no change in the form: it's the same form, it will just be completed for...there'll be in a separate report group completed for the particular HOPWA-C-CV award. But same—same form.

[46:16–46:17] \*Pause\*

[46:18–46:32] **Claire Donze:** And we will have more specific guidance for competitive grantees and their APR at a later date, but it will be using the same form as your other competitive APRs.

[46:32–46:35] \*Pause\*

[46:35–46:43] **Jonathon Sherwood:** Right—no different questions, no new questions, no different forms.

[46:43–46:45] \*Pause\*

[46:45–46:51] **Heather Rhoda:** Same form—Jonathan, just to clarify—same form but two different forms?

[46:52] **Jonathon Sherwood:** Two separate reports.

[46:53–46:54] **Heather Rhoda:** Yes, thank you.

[46:54] **Jonathon Sherwood:** Same form.

[46:55] **Heather Rhoda:** Yep.

[46:55–47:00] \*Pause\*

[47:00–47:06] **Steve Ellis:** What are the deadlines for grantees to expend their CARES Act funding?

[47:06–47:11] \*Pause\*

[47:11–47:39] **Claire Donze:** I can take this one: CARES Act funds are three-year grants like all HOPWA grants. So, you have three years from your grant—CARES Act grant start date to incur your costs and then 90 days after the end of your CARES Act grant to complete all of your draws.

[47:39–47:47] \*Pause\*

[47:47–48:13] **Steve Ellis:** There seems to be a few questions about communities that are just getting access to their funds or the ability to actually disperse them and about reimbursing some costs. So, I guess the question would be: how do they report on the expenditures that might have been from...incurred in 2020 even if it's a 2021 CAPER?

[48:13–48:22] \*Pause\*

[48:22–49:20] **Claire Donze:** I can start the answer to that. So, you're reporting the activities that are reporting in your...reported in your CAPER are the activities that occurred in that 12-month reporting period. So, knowing that the CARES Act funds, you know, there was...it always take some time to have grant funds hit IDIS for your draws but, knowing that there was need before that, if you conducted activities before you actually were able to draw down your grant, you should report those activities and the reporting year in which they were incurred. Not necessarily when the draw was made.

[49:20–49:27] \*Pause\*

[49:27–49:35] **Claire Donze:** And you can reflect that also with the approximate date of cost incurred functionality and IDIS when you do make that draw.

[49:35–49:50] \*Pause\*

[49:50–50:05] **Steve Ellis:** So, Claire, while you're there, there's a few questions about the reporting requirements for FFATA. So, I guess we'll just sort of clump those together. If anyone has questions about those reporting requirements, how would they find that information?

[50:05–50:09] \*Pause\*

[50:09–51:18] **Claire Donze:** I would say, first and foremost, reference the HUD OCFO training that was linked in that one...in the slide right before this one: it is, I think—I believe it was an over-hour training, so there's a lot of information there, and it also, I believe, in that training, links to the FFATA Act requirements itself so you can see more specifically what those requirements are. And after referencing that training, if...the other resource available is there are several trainings on FSRs.gov, so there is some valuable information there as well and, if all of that fails, you can submit an Ask-A-Question to us and we can help direct you to the...to the entity or the resource that could answer your question.

[51:18–51:22] \*Pause\*

[51:22–52:20] **Jonathon Sherwood:** And, Claire, if I can just affirm in case there's any confusion especially 'cause the FFATA information may be there to folks that that...this, as with everything we've been talking about with the financial reporting and IDIS, the submission of the APR CAPERS to HUD and that...those are all grantee responsibility, so it's the grantee—if you're a project sponsor on this call it's your grantee that would be the responsible party for entering that information, fulfilling that FFATA requirement by entering in the FSRS system. They may need information from you to do that, but it is that the...the actual entering of that and the responsibility for that is with the grantee.

[52:20–52:24] \*Pause\*

[52:24–52:25] **Jonathon Sherwood:** Just to clarify.

[52:26–52:27] **Claire Donze:** Yeah, thank you.

[52:27–52:33] \*Pause\*

[52:33–52:57] **Steve Ellis:** So, there's a few questions about admin and how the caps on admin might affect reporting. So, with those differences between the regular and the CARES Act, will there be any issues when it comes to reporting if it appears as though grantee or project sponsor admins are above the regulatory cap?

[50:05–50:09] \*Pause\*

[52:57–54:05] **Claire Donze:** I can take that one as well: So, no, we recognize...no, there will be no issues if in your CAPER it looks like your...you spent more than your admin caps 'cause we know that was in your CAPER. There are grants that have different admin...admin caps that are aggregated together, so we don't use what is reported in your CAPER to check for admin cost cap compliance and we recognize that there is multiple caps represented within that one expenditure line so, there...no, there are no issues with...with both the CARES Act admin cap and the regular...your regular formula admin caps being reported in the CAPER. We don't use that for checking for compliance.

[54:05–54:14] \*Pause\*

[54:14–54:26] **Steve Ellis:** If a grantee expends their CARES Act funds sooner than three years, will there be any expectation for any additional reporting once those funds are spent?

[54:26–54:34] \*Pause\*

[54:34–55:09] **Claire Donze:** I can hop in again. No, there will not be and, again, what is reported in your CAPERS is the activities that occurred within that 12-month reporting period. So, if you fully expend your CARES Act award in a year or year-and-a-half, that means that there will be no CARES Act activities beyond that and we would therefore not expect you to report activities that didn't happen.

[55:09–55:15] \*Pause\*

[55:15–55:26] **Steve Ellis:** That is, unless people were using their CARES Act for something that had additional reporting requirements. But, if the funds are expended, then there will be no additional requirements.

[55:26–55:30] \*Pause\*

[55:30] **Claire Donze:** Correct.

[55:30–55:33] \*Pause\*

[55:33–56:01] **Steve Ellis:** So, there's a few questions that I think are trying to get to the idea of clients who might be accessing HOPWA activities across regular and CARES Act and how they

might de-duplicate if it's going to end up on one CAPER. So, for example: what is the expectation if a household would be accessing regular STRMU and CARES Act STRMU within the same reporting period?

[56:01–56:12] \*Pause\*

[56:12–58:37] **Jonathon Sherwood:** \*Laughs\* I don't know...I'll take a shot at that and then Claire, you can add anything. That's a...that's a good question and it is a kind of wrinkle similar to that with the different admin requirement or the admin caps are different for the CARES Act so that could, that could show up. You're gonna have folks who are served with multiple...may be served with, you know, quote-unquote “regular STRMU” to this quite particular question and then 12 months or longer additional STRMU on top of that. In terms of how to report that, I'd say that it's always the goal to try and have households de-duplicated if it's possible and that's...that's the case with the reports as they've always been, as well. So, I think the initial guidance and perhaps we can see if there's any follow-up additional guidance or FAQ out of this would be to, in as much as possible, de-duplicate it. It'll be hard to track—we did discuss that part of this call; we can't really track well this is a regular quote-unquote “regular” STRMU that's capped at 26 weeks. This is, you know, regular with the...under the waiver of the 52 weeks or this is CARES Act at 104 weeks. Those won't be able to be separated so I would approach it just as de-duplicating as much as possible even across the different types of the single activity because, in the end, there's just going to be room for one total number of households served with that activity and total dollars spent with that activity. So, in the end, as much as possible, de-duplicate it. And, Claire, let me know if you think that that is accurate. It's a good question.

[58:37–58:40] \*Pause\*

[58:40–58:44] **Claire Donze:** It is a good question. I think you...I agree with what you said, Jonathon.

[58:44–58:46] \*Pause\*

[58:46–59:20] **Jonathon Sherwood:** And then, again, this might...that might be the kind of thing that could be nuanced in a narrative, but at the data level, you know, there's really no way to capture it and if you...if you duplicated those households it wouldn't quite look accurate, either. So, there's not a kind of a perfect way to represent that that really calls for being de-duplicated as much as possible since it's just a single number for each activity.

[59:20–59:27] \*Pause\*

[59:27–59:52] **Steve Ellis:** Thank you. There seems to be a few questions in general about how to gather data from project sponsors and, you know, should project sponsors submit separate reports? One report? So, I guess I'll try to aggregate those questions into: What are HUD's requirements for how grantees capture data from project sponsors that end up on the CAPER?

[59:52–59:57] \*Pause\*

[59:57–1:01:33] **Jonathon Sherwood:** I think that there...there are no specific requirements for the grantees in terms of how they collect data from project sponsors. There's just the requirements that have on their end. And so, to work...I would suggest work backwards from there. So, if at the financial level all the expenditures need to be tied to particular awards and IDIS and, this year more than ever with the layer that CARES Act awards, there may be multiple awards that project sponsors are spending on at any given time, that will need to be track clearly and reported clearly from a sponsor to a grantee because the grantee will need to be

able to clearly separate that out: those different dollar amounts. And attach a dollar at the invoice by project sponsor can only be attached to one award at the grantee level, and so it'll be...one way or the other the grantee will need to have that information clearly separated out. For the...for the CAPER reporting, it may be aggregated, but certainly for the financial, that needs to be tracked clearly. And so, whatever...again, I would start with what does the grantee need to do for HUD and then work backwards to how you collect from their sponsor.

[1:01:33–1:01:39] \*Pause\*

[1:01:39–1:01:48] **Jonathon Sherwood:** But I don't think that HUD has any prescriptive—it hasn't, in the past, had any prescriptive way of how the grantees need to perform that.

[1:01:48–1:01:57] \*Pause\*

[1:01:57–1:02:35] **Steve Ellis:** Just a reminder to individuals: if you do have a question, feel free to throw it in the box. There are some questions that are pretty specific to communities and I've tried to respond to each saying that we will follow up once the webinar is done 'cause there are probably some specific questions we would need to ask in return. So, I apologize if we're not asking your question out loud; we promise we will follow up with those that we did not. A question that is coming up is about will there be reminders or reminder email sent out for competitive grantees for when their CARES Act reports are due?

[1:02:35–1:02:39] \*Pause\*

[1:02:39–1:03:06] **Jonathon Sherwood:** Yes, that should...that should be...that should be as with the normal practice. Once we have all those...start dates are set and as their set with the award then we'll...12 months plus 90 in the...days in the future would start the notifications for those awards.

[1:03:06–1:03:15] \*Pause\*

[1:03:15–1:03:41] **Steve Ellis:** So, sort of bigger picture for HOPWA reporting: there is a question about communities that have some extra time to report and if extra time or extensions on reporting changes their...what timeline they might report. So, if there is an extension, does that change what period of time they should be reporting on?

[1:03:41–1:03:43] \*Pause\*

[1:03:43–1:04:49] **Jonathon Sherwood:** Claire, I'm happy to answer that one. That's a good question; uh no because the report is always on (for formula grantees) based on the grantee's operating year and (for competitive) based on the start date of that award. So with...even with an extension, if the grantee—I'll use an example—had a July to June operating year, so they would have had an operating year close this last June, their report normally would have been due by the end of September, they got a 90-day extension and now it's not due till the end of the year. But it's still for that July '19 through June 2020 date range. So, the extension just gives you more time to complete it but always for the same past performance period. So, those are...those are fixed. Those are standard and don't change with the extensions. That's a good question.

[1:04:49–1:05:02] \*Pause\*

[1:05:02–1:05:18] **Steve Ellis:** There doesn't seem to be much else in the form of questions. As I mentioned, there are some individuals who have asked questions that said they're specific to their communities and I promised some follow up once we are finished with this webinar.

[1:05:18–1:05:21] \*Pause\*

**[1:05:21–1:05:27] Jonathon Sherwood:** Should we move on to the closing slides, then? Just the additional information.

**[1:05:28] Steve Ellis:** Of course.

**[1:05:28–1:05:34] \*Pause\***

**[1:05:34–1:06:48] Jonathon Sherwood:** So, a standing reminder for all of these: if you have not already, please subscribe to the HUD Exchange listserv at the HUDexchange.info website. There is also HUD-directed guidance that comes out...comes out through a separate channel that might be specific guidance that comes from HUD and it's not, as with this webinar, a TA provider product. There is also HUD.gov mailing list you could subscribe to and the link is there for that. We do have the upcoming webinar on the 16<sup>th</sup>, on Wednesday: COVID-19-Related Policy and Procedure Development for HOPWA and if you haven't already, we urge you to take a look at and sign up or forward on to relevant folks: your agency or your partner organizations that would be helpful for. Next slide.

**[1:06:48–1:06:52] \*Pause\***

**[1:06:52–1:08:06] Jonathon Sherwood:** As ever, a reminder that there is HOPWA technical assistance available to grantees in a variety of forms: there is, of course the Ask-A-Question through the HUD Exchange portal, but the general way to ask ...to access all the different types of HOPWA technical assistance is through the link provided, which can direct you to the quick and easy Ask-A-Question portal but also how to ask for more in-depth direct technical assistance. There is technical assistance available through the Office of HIV/AIDS Housing normally as well as specifically for...related to the CARES Act. To access that CARES Act-related particular, as this notes, write in the topic "Health Preparedness and Response." That will help us - HUD - and target it as a COVID-19-related issue. Next slide.

**[1:08:06–1:08:12] \*Pause\***

**[1:08:13–1:08:52] Jonathon Sherwood:** And a general set of resources: these have been provided through other webinars as well but there's a lot of information that's come out related to the CARES Act in particular as well as generally to the federal response and HUD's response to COVID-19. So, the granting of flexibilities and waivers for how to operate your programs as well as information specifically related to the CARES Act so you can follow the links for additional information.

**[1:08:52–1:08:57] \*Pause\***

**[1:08:57–1:09:38] Jonathon Sherwood:** And then just a reminder, again: the Ask-A-Question—folks make good use of that, which is appreciated by HUD; it helps save other TA resources for more in-depth engagements so, if you have fairly specific questions, you can access the HOPWA Ask-A-Question through the portal and there's a number of TA providers including Cloudburst and our colleagues at Collaborative Solutions and Technical Assistance Collaborative who are involved in responding to those questions that come in in collaboration with HUD.

**[1:09:38–1:09:43] \*Pause\***

**[1:09:43–1:09:59] Jonathon Sherwood:** There's your link to the HUD Exchange email list and there is lots of updated guidance as available on HUD Exchange, as well as on HOPWA—the HOPWA page on HUD.gov related to COVID-19.

**[1:09:59–1:10:06] \*Pause\***

**[1:10:06–1:12:23] Jonathon Sherwood:** So, standing reminders as well from...this has been with other webinars as well: there is...with that guidance that come—has come out there's a lot of guidance that's very particular to different HUD programs. There is specific flexibilities offered to, say, the Continuum of Care programs, the Emergency Solutions Grant program, the HOME program, Community Development Block Grant, and HOPWA. That guidance is not transferable amongst programs so, if you are looking for that, there...again, there's a lot of information out there on HUD Exchange and HUD.gov. Do take care to make sure that you are looking at HOPWA-specific guidance in applying something to your program and, of course, as ever, if you have a question there are folks available to help with that starting with the...\*inaudible\*. Grantees are responsible for waiver notifications and developments of any new procedures so if...if you're a project sponsor and have questions about any of the flexibilities or waivers available, make sure you communicate with your grantee about that—they are ultimately the point of contact for that—and work with their local field office and keep them informed about any of those waivers and flexibilities that they're taking advantage of. So, coordinate with your grantee and certainly, if you're making any changes to policies and procedures in the course of responding to the pandemic, work with your grantee there as well. So, stay tuned we're...we all are doing our best to keep folks informed as new information comes out both on how to best respond in your HOPWA implementation to the pandemic as well as things like this which are more ministrative to make sure as we...HUD has more information, it will be coming out, so keep an eye on the listserv.

**[1:12:23–1:12:26] \*Pause\***

**[1:12:26–1:13:28] Jonathon Sherwood:** And thank you very much. So, I don't know if any more questions have come in; we're actually a few minutes early. I think we...we've got...certainly gotten good questions through the course of this. As Steven said, that they'll...he's been responding and others have been responding to questions directly as they've come in if they haven't been brought up here or will be responded to afterwards. We compile all of the questions that come in and stay tuned for any FAQ or other resource that might come out of...for this particular topic as well as, depending on the need, there may be additional webinar opportunities related to reporting if...if needed. So, thank you, everybody. Any other questions, Steve?

**[1:13:29–1:13:55] Steve Ellis:** There aren't any new questions for everyone. So, just as a reminder that if you...while we're still open, if you'd like a copy of the slides, you can look under handouts. We will also email the slides out to everyone who registered for the webinar and that these will be posted to the HUD Exchange in the next several weeks as well with this presentation and some of the questions and answers that were asked today.

**[1:13:55–1:13:56] \*Pause\***

**[1:13:56–1:14:33] Jonathon Sherwood:** Okay. And one final reminder: if you're a grantee in the normal courses of getting to the point of completing your APR you have questions about that, you know, Cloudburst is available through the normal contacts to help answer questions as you're putting that together. We'll be including this information in the notifications that will be going out moving forward about upcoming reports due. So, hopefully if you have questions, you'll have plenty of opportunity to have those addressed along the way.

**[1:14:33–1:14:39] \*Pause\***

**[1:14:39–1:14:51] Steven Ellis:** All right. Thank you, everyone, for your time today and, as Jonathan mentioned, if you do have any questions please feel free to reach out to us or the HOPWA AAQ. Thank you.

**[1:14:52] Jonathon Sherwood:** Thank you.

**[1:14:52–1:14:55]** \*Pause\*

**[1:14:55] Claire Donze:** Thanks, everyone.

**[1:14:56–1:15:06]** \*Pause as the presentation and call are closed\*