U.S. Department of Housing and Urban Development
Office of Housing Counseling

BMC
BOOTH MANAGEMENT
CONSULTING

Facilitated by
Booth Management Consulting
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Columbia, MD 21046

Overview of Action Plans

November 29, 2018 2 PM EST

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Topics

1. Overview
2. Types of Action Plans
3. Action Plan Process Flow
4. Requesting Assistance
5. Benefits
6. Questions

Overview

What is an Action Plan?

An Action Plan is a strategy or course of action for an agency

- Assess for compliance with Uniform Guidance and HUD Grant Agreement requirements
- Develop targeted technical assistance to address agency's specific needs
- Recommend corrective action plan
- Deliver assistance

Types of Action Plans

Types of Action Plans

On-boarding Action Plan - New agencies or agencies with new key personnel

Review

- Financial and administrative grant requirements
- Policies and procedures
- Personnel activity reporting templates
- Quarterly financial reporting templates
- Sub-grantee Award & Monitoring policies and procedures
- Accounting System Compliance
- Financial statements
- Indirect cost rate information

Types of Action Plans

Internal Control Assessments - Available to all agencies

Review

- Compliance with Uniform Guidance internal control requirements
- Segregation of Duties
- Policies & Procedures/Narratives
- Accounting system
- Organizational Chart
- Reporting templates
- Key Business Processes

Types of Action Plans

Intermediary Assessments - Pass-through entities ONLY

Review

- Sub-grantee Award & Monitoring policies and procedures
- Billing Methodology
- Sub-grantee agreement
- Reporting templates provided to sub-grantees
- Sample award documentation
- Sub-grantee payment terms and conditions
- Sub-grantee monitoring plan
- Sub-grantee monitoring report

Types of Action Plans

Uniform Guidance Compliance Assessments - All agencies

Review

- Financial Disclosures & Self-Certifications
- 10% De Minimis Rate
- Sub-grantee award & monitoring policies and procedures
- Timekeeping and Personnel Activity Reporting
- Reporting
- Single Audit Compliance, if applicable

Types of Action Plans

Procurement Assessment - All agencies

Review

- Documented policies and procedures specific to agency
- Methods of Procurement
- Procurement files
- Organizational chart (roles and responsibilities)

Action Plan Process Flow

Action Plan Process Flow

Phases in the Action Plan Process Flow

- **PHASE 1**: Planning

- **PHASE 2**: Assessment

- **PHASE 3**: Reporting

- **PHASE 4**: Corrective Actions
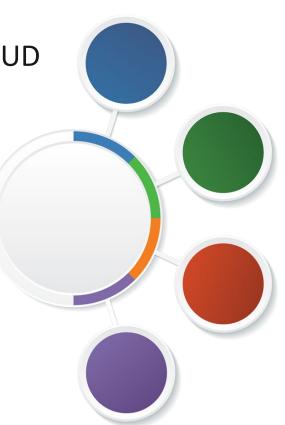
Action Plan Process Flow

Phase 1: Planning

- **STEP 1**: Initial Notification from HUD

- **STEP 2**:BMC sends Notification Letter & Document Request List

- **STEP 3**: Documents Received

- **STEP 4**: Schedule meeting with Agency reps and HUD POC

Action Plan Process Flow

Phase 2: Conduct Assessment

- **STEP 1**: Conduct preliminary assessment

- **STEP 2**:Review assessment with Agency representatives

- **STEP 3**: Make corrections as necessary

- **STEP 4**: Note deficiencies and

Action Plan Process Flow

Phase 3: Reporting

- **STEP 1**: Document work performed, issues noted, make recommendations

- **STEP 2**: Submit report to HUD for review

- **STEP 3**: Finalize Report

- **STEP 4**: Issue final report to Agency

Action Plan Process Flow

Phase 4: Corrective Action

For agencies with observations or deficiencies, we recommend corrective actions including:

- Description of observation/deficiency
- Recommendation for resolution
- Recommendation for technical assistance, training, financial analysis, or other follow-up actions

Requesting Assistance

Requesting Assistance

1. **REQUEST Assistance from HUD POC**: State assistance required, person who will be the POC if approved, and availability for the assistance

2. **POC APPROVAL**: HUD POC reviews and determines for approval

3. **INITIATE ASSISTANCE**: If HUD POC approves, will submit to the HUD GTM for assistance

Available Services

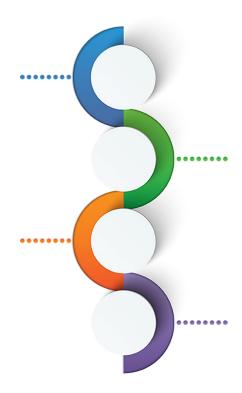| Type of Assistance	Description	Onsite and/or Remote
Action Plans	• Onboarding Action Plan • Internal Control Assessment • Procurement Assessment • Intermediary Assessment • Uniform Guidance Assessment	Onsite or Remote
Training	• Grant Financial Requirements • Grant Financial Reporting • Timekeeping & Personnel Activity Reporting	Onsite or Remote

Available Services

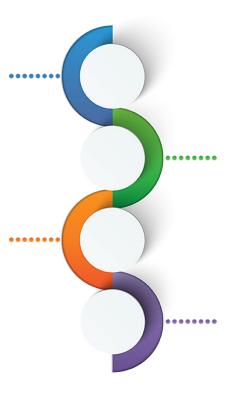| Type of Assistance	Description	Onsite and/or Remote
Technical Assistance	• Develop, modify, and/or update policies and procedures • Personnel Activity Reporting and Quarterly Financial Reporting Templates • Address findings from reviews	Onsite or Remote
Financial Analysis	• Grant Executive Package Review • Financial Capability Assessment • Risk Assessment • Financial Review of sub-grantees • Accounting System Review • Billing Methodology Review • Indirect Cost Methodology Review • Quarterly Financial & Personnel Activity Report Review	Onsite or Remote

Benefits

Benefits to HUD

- Consistent application of Federal financial management regulations

- Provide HUD POCs with more time to focus on performance management - which is a major consideration under the Uniform Guidance

- Reduce risk associated with fraud, waste, and abuse by using experienced financial analysts and auditors

Benefits to HUD

- Comprehensive assistance to grantees to minimize the burdens of grant management

- Potentially reduce findings during performance and financial reviews

- Provide financial and administrative technical assistance to grantees that can be transferred to other Federal programs

- Reduce administrative burden through training of sub-grantees

Please forward any questions to:
housing.counseling@hud.gov
with
"Overview of Action Plans"
in the Subject line
Note: Only questions related to the HUD, Office of Housing Counseling, Comprehensive Housing Counseling grant will be accepted and responded to.