



Final Transcript

HUD-US DEPT OF HOUSING & URBAN DEVELOPMENT: Overview of Action Plans

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SPEAKERS

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PRESENTATION

Moderator Ladies and gentlemen, thank you for standing by. Welcome to the Overview of Action Plans. At this time, all participants are in a listen-only mode. Later we will conduct a question and answer session. [Operator instructions]. As a reminder, today's call is being recorded.

I'd now like to turn the conference over to your host, Petergay Bryan. Please go ahead.

Petergay Hello, everyone. Welcome to HUD Office of Housing Counseling training on Overview of Financial Management Action Plans. This

training is specific to recipients or participants of the Office of Housing Counseling grant program, so if you received another type of bank funding from HUD, but you're not a recipient of the OHC grant, then this may not pertain to you.

Audio will be recorded during today's training. The playback number along with the PowerPoint presentation and a transcript will be available to you on the HUD Exchange at the link that you can see on your screen, hudexchange.info. The training digest will also be updated on the HUD Exchange once the webinar is posted to the website.

If you signed up for this training, you should have received an email with a PDF document with a copy of today's presentation attached, however, if you did not get that email, if you expand your control panel on your screen, you will see a section that says handouts. If you double click on that, you'll be able to download a copy of the PDF file and then follow along or take notes for your records.

During today's call, because of the volume of participants, we may not pause for live questions at the end of today's session, however, if you do have questions that you wanted to ask during the presentation, you can

expand the control panel. There's a section that says questions. Click that, type your questions in, and we do have staff from my company, Booth Management Consulting, who will be responding to your questions in real time.

If after today you think of additional questions that you may need help with or responses to, you can send those emails to housing.counseling@hud.gov, and put today's topic in the subject line. This is the Overview of Financial Management Action Plans that you would put in your subject line to housing.counseling@hud.gov with all of your questions.

Your phone lines will be muted during today's presentation so as not to disrupt the flow of the training. Again, if you needed to ask questions, please use the question box in the control panel to do so.

If you logged into the webinar from your own computer, you'll receive an email that will say thank you for attending within the next 48 hours. That will be your certificate of training. Know that there won't be any attachments to that email, so you'll just have to print and save that document for your records as notice that you participated in this training.

The webinar materials will be posted on HUD Exchange in the webinar archives. You can search for it by topic or by date, and if you wish to receive credit, then you would select the webinar, today's webinar, and then click Get Credits for this Training, and it will give you instructions for how you can actually receive credit for having participated today.

I'm Petergay Bryan. I'm the audit manager at Booth Management Consulting. Booth Management Consulting is HUD's contractor for providing technical assistance to participants in the Office of Housing Counseling grant program. As part of our job here, we conduct action plans for participants in the OHC grant program.

We also do financial and administrative reviews where we go on site at agencies and conduct compliance reviews. We provide technical assistance in various areas, which we'll talk about later today, and we also conduct different types of financial analyses all relative to the financial and administrative management of the OHC grant that you received from HUD.

So, today we'll first do an overview, what is an action plan, the different types of action plans that we conduct, the process flow for action plans, how to request assistance if you're interested, the benefits to HUD as well as benefits to participants of the program that we've received feedback on over the years of providing this type of work, and then again, how you can pose any questions as in after the fact, after today's training.

So, an action plan is really a strategy or a course of action for a specific agency. So, relative to your OHC grant, your Office of Housing Counseling grant that you have with HUD, what is usually done is that we request certain documents from agencies. We perform a high-level assessment for compliance with the Uniform Guidance, and that's the regulatory requirements, that list of all the regulatory requirements that are required of participation in the OHC grant program.

We also assess for compliance with your HUD grant agreement as well as your NOFA that you agreed to during the grant execution process. Once we conduct that high-level assessment, we then develop a targeted approach to providing technical assistance that's going to address your agency's needs.

If there's anything that we note while conducting our assessment, after communicating with agencies, we try to develop specific technical assistance to agencies that will be able to assist them to make sure that they are, for one, aware of what the requirements are for the grant agreement, and then to also ensure that they will remain in compliance with the requirement.

We also recommend corrective action plans for agencies, and we help them to implement those and deliver depending on what it is in various formats, which we'll discuss later.

There are several different types of action plans. The first type of action plan has to do with onboarding, so onboarding action plans are really for new agencies that have never received a housing counseling grant from HUD before, or if you haven't received a housing counseling grant from HUD in a few years, or if an agency has new personnel who are key to the performance of the grant. We do the onboarding action plan so that everyone can be on the same page. They'll know what the requirements are and how to fulfill and meet those requirements.

So, certain things that are included in an onboarding action plan is we will first look at the financial and administrative grant requirements with the agency so that you know what those requirements are.

What type of an accounting system do you guys need to have in place?

How do you need to set up your grant fund? What kind of segregation of duties do you need to make sure are in place for your grant? What are the key business process areas relative to the housing counseling grant? How do you make sure that personnel in your agency are aware of what your policies and procedures are? How do you make sure that your employees know who should perform what function as it relates to the grant?

We also look at how agencies do personnel activity reporting. One of the major types of expenses that agencies submit for reimbursement with the OHC grant has to do with personal costs, so salary and fringe benefits costs. So, in order for agencies to submit that for reimbursement, you have to make sure that you're doing some type of personal activity reporting so that you can then determine what types of activities or what types of direct services that were performed by your agency can you submit to HUD for reimbursement and then also to make sure that you're

tracking it in a way that you can easily identify what was allocable to the HUD grant at the time that you're doing your report.

That leads us into the quarterly financial reporting template. What's required of you with quarterly financial reporting? How often do you need to submit your quarterly financial reports? Who do you need to submit it to? What are the elements of quarterly financial reports?

How should you report it, cumulatively or quarterly? Does it need to include any attachments? For example, for parent agencies or intermediaries, they have to submit a quarterly financial report as well a federal financial report. So, we go through all of those different reporting requirements. We take a look at your templates to see whether or not they're in compliance.

Speaking of parent agencies, what are the subgrantee award and monitoring policies that the parent agencies have in place? Is it compliant with the requirements of the Uniform Guidance? We'll go further into the subgrantee award and monitoring policies and procedures on another screen because that's a separate type of action plan that we could also do specific to subgrantee award and monitoring.

Accounting compliance systems. Accounting systems compliance, we're taking a look at your accounting system, seeing whether or not you have a system in place to properly account for the grant. So, basically what that means is the agency has set up a separate HUD fund for each HUD grant that they receive from HUD. How are the transactions being processed? Periodically, who's reviewing these transactions for accuracy? For example, if there needs to be any re-classifications and things like that, how does that process work?

So, we really try to get a good understanding of your agency's policies and procedures and what is your process flow and how you manage the grant. Then, we can be better able to assist you if necessary.

Your financial statements. Are you getting your financial statements audited every two years as is required by your HUD grant agreement? If you are supposed to get a single audit done, and that is for agencies that have expended over \$750,000 in federal funds, then we're looking at your single audit reports as well to see whether or not there were any deficiencies noted, and if you have any corrective action plans, what did you do with those corrective action plans? Are you moving in the

direction of making sure that those action plans are implemented and working properly to address those deficiencies, etc.?

We also look at your indirect cost rate information. If you opt to submit indirect costs for reimbursement, we're looking at what is the methodology for doing so? Are you using a negotiated indirect cost rate agreement? If that is the case, we do take a look at the agreement, make sure that we're using the correct rate as specified in the agreement, and then also making sure that you're applying the correct rate to the correct base in your application of that agreement.

If you are opting to use the 10% de minimis rate, we're looking at what constitutes your agency's modified total direct cost because if you use the 10% de minimis rate, then you have to make sure that you're only applying that to modified total direct costs. The modified total direct cost is described for you in the Uniform Guidance.

For agencies that won't be charging indirect costs, and of course, we just get that information from agencies, then there's nothing more to do on that aspect.

If you are a parent agency, and you have subgrantees, we also look at what your subgrantees or what you're allowing or communicating to your subgrantees relative to indirect cost rates.

So, pretty much for onboarding action plans, once we get the information from agencies, and we review with them and meet with the agencies and discuss, we're really able to get an idea of where the agency stands. Is the agency informed on what are the financial and administrative requirements for the grant? If there are any areas that the agency may need assistance, we're able to identify that from early on in your grant year to then provide any assistance that you may need.

Some agencies they have similar grants, and so they're fully compliant, and there is no need for further assistance, but other agencies may need the assistance.

We also do internal control assessments, and this is available for all agencies. When we conduct the internal control assessments, again, we want to first take a look at their compliance with the Uniform Guidance requirements, so we're specifically going to the Uniform Guidance Part

200.303 where it talks about what is required of recipients of federal awards.

So, basically, you know that if you're receiving a federal award, you have to establish and maintain effective controls over the award so that you're able to provide reasonable assurance that your entity is managing the grant in compliance with the terms and conditions of the grant award itself as well as with the Uniform Guidance requirement.

Also, you have to make sure that you're evaluating your entity's compliance with the tax use and regulations periodically. So, what is your process for doing so? If there are any instances of non-compliance, what is your process for making sure that that is remedied in a timely manner? What are you doing to make sure that you're taking reasonable measures for safeguarding personally identifiable information?

So, when we conduct the internal controlled assessments, these are the types of things that we're looking for in our assessment. So, we request certain documentation from you to include your policies and procedures for the key business process areas. We communicate what those key business process areas are, and we're reviewing them to see okay, does

this need to be updated, does it seem okay as is, can we recommend anything that you may want to consider or implement?

Also, we're asking agencies to complete segregation of duties grids where over the cash receipts, cash disbursements, and payroll business cycles.

When agencies complete the grid, we're able to see whether or not there's enough segregation of duties in your agency, and sometimes, especially for smaller agencies they aren't able to fully segregate certain duties in some of the business process areas, but they are able to implement mitigating controls, and they communicate that with us while we're conducting the action plan.

Some entities they may need help with thinking of ways to mitigate certain deficiencies that may be there, so we've worked with agencies where we have recommended certain mitigating controls because they're so small, there's no way for them to fully segregate certain duties.

We also look at the accounting system when we conduct this type of assessment where we're checking to see, again, how are you accounting for the grant? Once you receive the award, how are you setting that up in your accounting system, and then how are you accounting for the

transactions on a go-forward basis? What are your reporting capabilities like once you set up your accounting system a certain way, and what types of supporting documents are you maintaining on file for your accounting system and your accounting transaction?

We also look at your organizational charts. When we combine the org chart with your policies and procedures and you're segregation of duties, we can kind of start to get an understanding of your controlled environment at your company, and we always make sure that we communicate with agencies to confirm our understanding of having reviewed these documents.

We also look at your reporting templates. So, for example, with your quarterly financial reporting, who's preparing that report? Then, once it's prepared, who is reviewing it? How do you certify that it's been reviewed? Is someone required to sign off on it?

We're looking at the different controls that you have in place over the different reports that you need to submit to HUD, and we always focus just on the key business processes that are important to the housing counseling grant.

The next type of action plan has to do with intermediary assessments, and this is for pass-through entities only. The Uniform guidance which became effective in 2014, it really prescribed a lot of changes for how pass-through entities deal with subgrantees, and the documentation that's required for subgrantees.

For example, the parent agency must make sure that they have a sub-award that's clearly documenting specific information in that sub-award. So, you have to make sure that you have a subgrantee agreement that's signed off by the parent agency as well as the subgrantee, and then you also have to make sure that certain requirements flow through from your agreement with HUD. As the intermediary, you have to make sure that you're passing that through to your subgrantees as well.

So, when we conduct our assessment, we're looking at what are your policies for awarding your subgrantees. Are you conducting a risk assessment of applicants to your program? How do you rate this risk assessment? Do you have this documented? It's not only to have the process in place where you're following it, you have to make sure that it's documented, and it's communicated to people in your organization.

So, when we conduct that assessment, that's what we're looking at to see what is your methodology at your company, and how are you communicating that to your employees?

Also, we are looking at your policies for monitoring your subgrantees. Once you have accepted your subgrantees into your program, what are your policies for monitoring them? Are you doing onsite reviews? Are you doing desk reviews of the agency? Are you doing expenditure reviews when they submit their costs for reimbursement?

Also, what does your monitoring plan look like? Is it something that is standard for all of the employees who do conduct the monitoring plan at your agency? Do they know specifically what to look for? Is there a report that is issued to your subgrantees once you've conducted a monitoring review of your subgrantees? Is all of that standardized in your own policies and procedures as an intermediary?

Also, we're looking to see what are the reporting templates, if any, that as a parent agency, what do you use and distribute to your subs? Do they

know specifically what needs to be reported on each period? Do they know when to report that information to you, and in what format?

We always encourage parent agencies to use templates and issue that to their subgrantees because it reduces the potential for errors or elimination. It standardizes everything for parent agencies, so it makes it easier for parent agencies to review the documents in order for them to then report to HUD on time.

Talking about timely reporting, as the intermediary, you have to report to HUD by specific due dates at the end of each quarter. So, what is the communication between you and your subgrantees to make sure that you can meet those reporting requirements to HUD? HUD needs specific information in a specific format, not a specific format, but they need specific information to be reported to them periodically. So, are you communicating that to your subgrantees as well so that you can then turn that around and submit your reports to HUD and giving them all of the information that they need?

We look at the reporting templates to see whether or not it includes all of the required elements for you as a parent agency to then report to HUD.

We also look at the payment terms. What are your payment terms with your subgrantees? Are you reimbursing them timely? What are you communicating with them so that you can therefore reimburse them timely?

We also look at a sample award document, again, to make sure that all of the clauses flow down from HUD through the subgrantee. We're looking to see what you're telling them about indirect cost rates because as parent agencies, if your subgrantees have a negotiated indirect cost rate agreement, and if they choose to submit indirect costs for reimbursement, then you have to allow them to use that agreement that they have.

If they are eligible to use the 10% de minimis rate, and they opt to do so, then you have to allow them to do that as well, but you as a parent agency, you just have to review that and make sure that what they're submitting to you is accurate.

So, these are the types of things that we look for when we conduct the intermediary assessment. We really try to make sure that at a minimum you're meeting the requirements of the Uniform Guidance. Sometimes we'll have agencies that have additional requirements of their subgrantees,

and that's perfectly fine, but at a minimum, you have to make sure that you're meeting the requirements of the Uniform Guidance as well as your HUD grant agreement, and those are the things that we look for when we conduct an intermediary assessment.

When we conduct Uniform Guidance compliance assessments, this is available to all agencies. Again, a lot of agencies, because they've been receiving the HUD grant for a very long time, they're kind of used to reporting certain things a certain way, and when the Uniform Guidance came into effect in 2014, then some agencies may have just continued to do so based on the old OMB circulars.

So, with the effects of the Uniform Guidance, what we do is we review agencies' documents for compliance with the Uniform Guidance where we go step-by-step. We look at the financial disclosures that agencies submit during the grant execution process where you're talking about your financial case management system certifying that your financial management system is up-to-date and that you're able to account for the HUD grant in accordance with the Uniform Guidance requirements.

We're also taking a look at the accounting system in this type of assessment as well to make sure that it's in line with what the requirements are for proper financial management. We're looking to see for agencies who are opting to use the 10% de minimis rate, we're looking at their methodology for the 10% de minimis rate. So, basically, we're checking to see what are you including in modified total direct cost to therefore apply the 10% de minimis rate to.

Also we are looking or discussing with agencies what types of supporting documents are you maintaining on file to show that if you guys should get selected for a financial and administrative review, and we opted to use the 10% de minimis rate, how am I making sure that I calculated it correctly, and how am I making sure that the direct costs that I applied it to is properly supported by documentation?

Another thing that we look at here is the subgrantee award and monitoring policies and procedures of parent agencies to make sure that they are in compliance with new Uniform Guidance requirements. Also, we take a look at your timekeeping or your personal activity reporting to see what does your agency have in place for timekeeping and personal activity reporting because, like I said earlier, as one of the larger items that are

most frequent line items that agencies submit for reimbursement, you want to make sure that it's properly tracked and documented and that you can easily identify what types of services are allocable to the housing counseling grant so that when you're doing your reporting, you can pull that information in and produce it to HUD.

We also look at your reporting. What are you using for your quarterly financial reporting, your annual financial, or your final financial reporting? If you are required to complete the federal financial report, how are you completing that? Are you doing that properly? Are you making sure that you're submitting your reports on time, and things of that nature?

Also, we're looking for a single audit compliance, so if you are eligible to have a single audit done, we're reviewing the single audit report. We're noting if there were any issue or deficiencies identified during the single audit. We are also looking to see whether or not you had the single audit performed timely and also whether or not you submitted it to the Federal Clearinghouse.

So, when we conduct Uniform Guidance compliance assessments, these are pretty much the areas that we look at in your entity to see whether or not you're meeting the standards that are required of you.

For procurement, this type of assessment is available for all agencies.

With the new Uniform Guidance, prior to the effect of the Uniform Guidance only agencies that expended over \$25,000 with federal funds needed to have a procurement policy in place. Once the Uniform Guidance became effective, all agencies are now required to have their own policies and procedures for procurement.

This was a change for a lot of agencies, so what we have done is we conduct an assessment. If an agency doesn't have policies and procedures for procurement, we assist agencies to develop that, but for the ones that do, we review their policies and procedures for procurement to see if their policies are compliant with the Uniform Guidance requirements.

It talks about the different methods of procurement and the various thresholds for the different methods of procurement, so we review for compliance to say okay, based on this method of procurement, according to the Uniform Guidance, these are the actions that your agency needs to

perform, and these are the types of documents that you need to make sure that you have on file.

So, while we do this assessment, we're looking to see what does your agency have in place currently. Is it compliant with what the Uniform Guidance says that you need to have for the different types of procurement methods? What are the files that you are requiring your employees to maintain on file for the different procurement methods, and how are you storing that information?

We also review your org chart for the procurement department so that we can help agencies to say okay, you know what, this is how you can align your flow for your procurement business cycle to make sure that you're in compliance with the Uniform Guidance requirements.

For agencies that did not have procurement policies and procedures in place, then we just recommend technical assistance where we actually help agencies to develop one. The procurement policies are always specific to the agency, so if you're pretty much just using the funds for small purchases and things like that, then we tailor it specific to the types or the of methods of procurement that are applicable to your agency.

I've spoken a lot about the different types of action plans, and as you can tell, it's pretty much where we're doing very high-level assessments of agencies' compliance with the Uniform Guidance as well as the HUD agreement requirements. So, the typical action plan has four phases.

First, we start with the planning phase. Then, we conduct the assessment, which is a high-level assessment. Then, we issue a report, and then it will include corrective action plans in that report if applicable, so the phase four is only if it's applicable to your agency, and then we talk about the different types of assistance that are available to you as participants of the housing counseling program.

In phase one, which is the planning phase for any typical action plan, what happens is you will get a notification from HUD. This may come from your HUD POC or a HUD GTM letting you know that you, as a participant of the program, you're going to be receiving an action plan. Once you receive that notification, then a couple of days or so later, you will receive an email notification from our company which is BMC, Booth Management Consulting, where we're letting you know hey, you guys have been approved to receive an action plan for your agency, and we also

include a document request list in that email notification where we're asking your for specific documents in order for us to do one of these types of assessments of your agency.

The email that BMC sends would also let you know where to upload the information because sometimes agencies have really large documents, so it's too large for them to email, so we do have a document repository where agencies can just simply upload the documents there, and we provide instructions for how agencies can upload their information.

Sometimes email works just fine, and that's fine, too, for how agencies submit their documents to us, but we do give them a due date for when the documents should be received. In order for us to be able to conduct the action plans and deliver the service to you timely, we ask that agencies meet the deadline or try to meet the deadline if that's possible.

The next step is that we receive the documents. Once we receive the documents, then the auditor, the BMC auditor will schedule a meeting with personnel from your agency as well as your HUD POC. Sometimes the HUD POC is unable to meet on the date that BMC and your agency meets, which is perfectly fine because we always stay in communication

with the HUD POCs as well, so if they're not able to be on the call with us, then we make sure that they're up-to-date on whatever information is exchanged during that call.

The next phase of the action plan, phase two is where we conduct the assessment, so once the documents have been received, and we've scheduled a meeting with your agency and your HUD POC, we begin to do a preliminary assessment. Any documents that may have not been submitted, we'll communicate that to you right away. We'll try to get that, and we'll start to do our assessment of each of the different areas that we're looking at depending on the type of action plan that you're getting.

So, if it's an onboarding action plan, we're looking at your policies and procedures, your organizational charts, your segregation of duties grids, your templates for timekeeping and personal activity reporting, your templates for quarterly financial reporting, we're looking at your audited financial statements to see what that says, we're looking at your single audit report to see if there's anything there that we need to pay attention to, so we're looking at all of that together to start to develop an assessment for your agency.

Then, we meet over the phone. It's usually via a conference call or a webinar where we will meet with the agency and the HUD POC to discuss our preliminary assessment. A lot of times, while we're just reviewing the documents that we received from the agency, we may still have some questions, so that is the time where we go through each area that we're reviewing one-by-one, and we say hey, I looked at, for example, I looked at your timesheet, and based on my review of your timesheet, I don't really see how you can tell whether or not the eight hours that Jane Doe worked is allocable to the HUD grant award. How do you make that determination?

Sometimes the agency will say hey, well you know it's not here on the timesheet. We keep track of it in this way, and then we say oh, okay, alright. Let's take a look at the other type of document that you used to make sure that you're tracking the work that's being performed by your housing counselors or your employees.

So, that's what happens during the webinar. We go through each section, any questions that we may have, we pose those questions. If we don't have any questions, we let you know what our assessment was for each

area that we look at, and then you as the agency can come in and give your input for each of the sections as well.

If we're noting any deficiencies, so say for example, for the agency I just mentioned, they don't have anything else, or they're unable to really say how they're able to track Jane Doe's time and make sure that it was allocable to the award, then we'll talk about it at that point to say okay, what type of assistance your agency may need in order to develop some type of a reporting template that will be able to suffice and be in the form of a personal activity report.

So, we're documenting for that area that we're attesting that there's a deficiency here where the agency, at this time, they don't have a method for personal activity reporting, but we're recommending technical assistance to help them to develop a personal activity report that's suitable or designed specifically for their agency and how you run your own program.

In phase two, this is where we meet with the agency. We make sure that everyone is on the same page before we get to phase three, which is the reporting phase. Once everyone is on the same page, now as the auditor

knows exactly what happens with your agency, relative to the different areas, then we can start to draft a report.

So, really we draft the work performed. We talk about the documents that we requested of you, we itemized the documents that we received, and then we talk about the results of each area that we looked at. Also for each area that we look at, we make sure that we're citing the regulatory, as well as the HUD requirements for each of those areas that we look at so that the entity will be able to go back to the regulatory requirements and say hey, okay, this is what they're reviewing me based off of, and then you can review it for yourself to see okay, this is what I'm being assessed on, this is what I have in place, these are the results based on our meeting with BMC.

Then, once we've drafted that report, we submit the report to HUD for review. Your HUD POC gets a copy of the report. They take a look at it. If they have questions or they want to make recommendations, then they'll communicate that to us. Once all of that process has occurred, we've spoken to your HUD POC, then we'll finalize the report if there are no changes that need to be made.

Once the report is finalized, then we'll issue the report to your agency.

Now, note that even before the report gets to HUD, the auditor at BMC, as well as representatives from your agency would have been able to review the report itself and look at each area before it even gets to HUD. So, everyone is on the same page before this report gets to HUD, and everything is agreed to prior to the report getting to HUD. You just don't get a physical copy until after the HUD POC has reviewed the report, and then the report is finalized, and you'll get a physical copy.

The next phase would be the corrective action plan. This is for agencies that have observations or deficiencies. So, while we're conducting our assessments for each of the areas, if we notice that there's a deficiency here or an observation here, we'll document it for each of the areas that we looked at.

We'll describe the deficiency. We'll make a recommendation for how that can be addressed, and then we'll also recommend for technical assistance or training or financial analysis or other type of follow-up action. If during the webinar or the meeting with the BMC auditor and representatives from your agency, if it's said that hey, you know what, we don't need the technical assistance. We are able to handle this this way,

and you let us know how you're going to fix it, for example, if it's something really small that you can fix on your own, then we'll just document that in our report. We'll say okay, we recommended this type of assistance, the agency rejected it, and this is what the agency rejected this type of assistance.

If during the call the agency said hey yes, you know what, I would like a template for quarterly financial reporting, or I would like for your guys to help us to develop our policies and procedures because we don't have a policy for this specific area, we do that, and we'll just document it in the report that we're recommending the technical assistance for this area, and it was already agreed to between BMC as well as your agency, so there are no surprises at the end of the day.

So, how to request assistance. As I've mentioned before, as participants of the housing counseling program, you can get assistance relative to the financial management and the administrative management of the grant. It's at no additional cost. It's just by you being a participant of the program.

If during the action plan, we recommend technical assistance for you or training or financial analysis, then your HUD POC will have already reviewed that when we submit the action plan report, and they will let us know whether or not they will approve for us to then provide the assistance to you.

So, for example, if you needed a quarterly financial reporting template, they will have received the action plan report which would state that we're recommending that you receive technical assistance for the quarterly financial reporting template, and they will let us know whether or not they approve that. If approved, then we would go forward and set up another date for us to develop a quarterly financial reporting template specific for your agency.

Same thing if it's your policies and procedures, or if you wanted to look at your procurement document, whatever it is, that would have already been covered in that way. However, if you needed assistance in any other area, then you can request assistance directly through your HUD POC where you would pretty much send an email to your HUD POC letting them know the type of assistance that you need, who at your agency will be responsible for monitoring this assistance, and then if the HUD POC

approves it, then they would communicate it to our HUD GTM who would let us know once our HUD GTM approves it, and they communicate that to us. Then, we reach out to your agency and schedule a date to provide the assistance.

These are the services that are available to you as participants of the program. We do onboarding action plans, so say, for example, you're a parent agency and you have subgrantees that were new to your program that you wanted us to do the onboarding action plan with. We can do that.

If you wanted internal control assessments to be done to see whether or not you have strong controls in place for your entity, we do that assistance as well. Procurement, we provide that assistance, those assessments where we're looking at your procurement policies and procedures to see whether or not they're compliant with the Uniform Guidance requirements.

If you're a parent agency, we conduct the intermediary assessment to see whether or not you're in compliance with the Uniform Guidance and the HUD grant agreement requirements. Then, for agencies that have not yet made sure that they're compliant with all of the requirements under the

Uniform Guidance, then we do an assessment to see where you guys are standing, and then provide any recommendations as applicable.

We also provide training to agencies. So, we can go over the grant financial requirements for the grant, grant financial reporting, so we're reviewing quarterly financial reports or training you on how to do quarterly financial reports. This has been particularly helpful, especially for parent agencies because we can come onsite and do it in a group setting with parent agencies as well as their subs, but if you prefer online, we do it that way, too. We can do it remotely. We also provide training on timekeeping and personal activity reporting as well.

We also offer technical assistance where we can develop or modify your policies and procedures. So, if you have outdated policies and procedures that haven't ever been updated for the past like seven or ten years, we can make sure that we go in, look at what you have in place and develop them for you. Or, if you don't have any policies and procedures, we can create them for you, but we work one-on-one with someone at your agency to make sure that it's tailored to your program's specific applications for the different business areas.

We also provide technical assistance where we create templates for personal activity reporting and quarterly financial reporting, and we offer those to agencies. Also, if you've had reviews relative to the housing counseling program, and you had findings, we also provide technical assistance to help agencies address those findings.

We also do financial analysis services. So, we do grant execution package reviews on behalf of HUD POCs as well as on behalf of parent agencies. So, if you are a parent agency and you have subgrantees, we can review the grant execution packages for your subgrantees.

We do financial capability assessment for agencies that haven't had their financial statements audited within the required two-year timeframe. So, in lieu of a financial statement audit, we can do a financial capability assessment for any agency.

We conduct risk assessments. Especially for parent agencies, we can do a risk assessment of their subgrantees. We do financial reviews of subgrantees, accounting system reviews, so we're looking at your accounting system to see specific for this grant, how is it set up, how will you do the recording and reporting of transactions. We also take a look at

your billing methodology, your indirect cost methodology. What do you have in place? Is it compliant? Are you following your own methodology properly?

Then, also quarterly financial and personal activity reporting reviews where we actually look at your reports before you submit them to HUD or before you submit them to your parent agency to make sure that it's compliant.

So, because we have been providing these services for a number of years, we've noted that it's really beneficial to HUD as well as agencies as a whole. Benefits for HUD that we've noted or we've received feedback stating that it helps HUD POCs or HUD to be consistent with the application of federal financial management regulation.

It also helps for HUD POCs to really have more time to focus on the performance management of the grant versus the financial management of the grant and also helps to reduce the risk that's associated with fraud and with abuse by using experienced financial analysts and auditors who focus on the financial management requirements for the grant.

Specific to agencies, this types of assistance helps grantees to minimize the burden of the grant management. We do realize that it can be a lot but once you know what to do, then, it becomes a lot easier, so helping agencies by being more proactive, letting you know what needs to be done, or whether or not you're in compliance, it does reduce the burden versus on the back end when you're told you weren't in compliance in this period of time.

Also, it could potentially reduce findings during the performance and financial reviews because, again, you're aware of what your requirements are. It can provide financial and administrative technical assistance to grantees that can be transferred to other federal programs because now you know by looking at the Uniform Guidance, the Uniform Guidance lets you know, as a recipient of any federal award, what you're required to do, so in us providing this assistance to you, you can transfer it to other federal grants that you may have.

Then, it reduces the administrative burden through training of subgrantees for parent agencies because, again, we do offer training and assistance to subgrantees as well, and so you can utilize that as much as you can or as

much as you need to so it can reduce that admin burden for training your subgrantees.

So, I'm taking a look to see questions online. I don't really see any questions in the questions box, so I want to thank you all for having participated in today's training. If you think of any questions later, you can submit them to housing.counseling@hud.gov with Overview of Action Plans in the subject line, and hopefully this session was informative to you all, and I want to thank you again. Have a good day.

Moderator

Thank you. Ladies and gentlemen, that will conclude our conference for today. Thank you for your participation and for using AT&T Executive TeleConference. You may now disconnect.