



Final Transcript

HUD-US DEPT OF HOUSING & URBAN DEVELOPMENT: Overview of Procurement Policies and Procedures

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SPEAKERS

Petergay Bryan
Delbert Strauzer
Tracy

PRESENTATION

Moderator Good afternoon, thank you for standing by and welcome to the Overview of Procurement Policies and Procedures Conference Call. Your telephone lines are in a listen-only mode at this time. As a reminder, today's conference call is being recorded.

I will now turn the conference call over to your first speaker, Petergay Bryan. Please go ahead.

Petergay

Hello, everyone. I'm Petergay Bryan with Booth Management Consulting. I want to thank you guys for joining us today as we go over the procurement requirements that have been affected by the Uniform Grant Guidance.

We'll first go over some logistics before we start the presentation. The first thing to know is that an audio is going to be recorded and it, along with the PowerPoint presentation, will be available to you on the HUD exchange. During the webinar your lines will all be muted. But there is also going to be availability for you guys to post questions during the session, and on the next slide I'll show you where you can.

So, if you look on your control panel on the right side you will see a questions box. If you select the button on the top right-hand corner, it will pop it out for you. You can post your questions there. We have someone from the BMC staff, who is live with us today, and that's Mr. Delbert Strauzer [ph]. He will be answering any questions that you have while we go through the presentation. If you think of any questions at the end of today's session, you can send them to housing.counseling@hud.gov with Overview of Procurement as the subject line so that will give us an idea of

the subject matter that you're requesting information on, and it will also help us to route the questions to the correct staff.

At the end of the session, you'll also be asked to complete a survey, a very brief survey and your responses do help the Office of Housing Counseling to better plan for future webinars. So, we really appreciate the feedback from you guys from these sessions. You're also going to receive an email from GoToMeeting and it will be a thank you for attending email. That will serve as your certificate of training. Please maintain that in your records so that you will have proof that you were in attendance for this meeting today.

We'll go ahead and get started. Again, I'm Petergay Bryan. I'm an audit manager here at Booth Management Consulting where I have for the past three or so years worked with agencies by conducting financial and administrative reviews, providing technical assistance to agencies and their sub-recipients. I've also conducted several action plans, and any questions as it relates to the financial management of the grant are usually routed through my area. So, I do have some experience and hopefully today you will learn what the requirements are and have a basic idea of the requirements for updating your procurement policies and procedures as

well as have some action plans for what you would do or some takeaway points at the end of the session.

We'll first start talking about some key terms and definitions that the Office of Housing Counseling definitely wants to make sure that you guys are aware of. We'll also talk about how the Uniform Grant Guidance requirements apply to you guys. We'll also discuss the key procurement changes that became effective. We'll talk about the changes with conflict of interest requirements for agencies that receive federal funds. We'll spend some time talking about the difference between sub-recipients versus contractors as it relates to your requirements for procuring goods and services.

We'll talk also about a proposed implementation approach, some best practices and lessons learned based on all work thus far as providing financial administrative reviews and looking at some procurement policies and procedures that agencies have in place. What are some things that we learned from conducting those reviews? We will also discuss some assistance that will be available to you under your contract with the Office of Housing Counseling, and we'll discuss some frequently asked questions as well as provide you with some resources and references as you guys go

out and update your policies and procedures or even just to look at your existing policies and procedures to see whether or not they are in compliant.

As for a definition, the Uniform Grant Guidance part 200.31 through 200.326 speak specifically to procurement requirements. It describes procurement as a purchase of commercially available goods or services that are in connection with a grant supported program or project. So, the procurement of goods and services relative to your Housing Counseling Grant whether it will be training, and we'll talk about some additional examples, those would be captured or covered in what's required under the new procurement standard.

As far as the policy, a policy is pretty much straightforward. It's clear simple statements on how your agency intends to conduct its services, actions or business. It should provide a set of guiding principles so that it will help anyone who is new to the program or if you have change in personnel or a new person that has just joined your agency they should be able to read your policies and have a clear idea of what needs to be done, who needs to perform what function, etc.

And your procedures they describe how each policy that you have set in place, how will they be executed. So, who is going to perform what function? What steps do they need to perform those functions? What documentation do they need to review? How should they document their review of certain items? Things like that are what constitute your procedures that you would need to document.

Examples of items that you would procure under the Housing Counseling Grant that would include any consultants that you use for the Housing Counseling Program, any training costs that you incur, your purchase of supplies or materials, your travel expenses, any expenses related to conferences or equipment purchases. Those are the types of things or the typical items that would be included in this, but it does not include your sub-award. So, money that you sub-grant to your sub-recipient agencies that does not fall under the category of being a procurement of goods and services.

I'm going to back up a little bit because I did forget to mention that the presentation that we're reviewing right now, it should have been emailed to you guys prior to today, but you will also have access to it. It's included, if you look on your control panel, there is also a tab for handouts

there as well and it's attached there, just in case anyone had questions on that.

As far as the applicability, effective December 26, 2014 any grants that had been issued thereafter are subject to the requirements of the Uniform Grant Guidance. However, they did issue an addendum in May of 2017, which gives agencies a three-year grace period for when they should have their procurement policies and procedures fully developed, drafted and implemented. So, for example if you had a fiscal yearend of June 30, 2014 you would be required to be fully implemented by June 30, 2017, which is this year. So, pretty much what that means is by December 31, 2017 all agencies who receive HUD funds will be required to have documented policies and procedures in place for the procurement of goods and services using the HUD funds.

Any agency that chooses to utilize this grace period, they have to document in their internal control policies and procedures that they're going to use the three-year grace period within which they will get everything together and have it fully implemented by the due date, which is going to be determined based on their fiscal yearend. So again if your fiscal yearend was June 30th then you would need to be in compliance as

of June 30, 2017. If it's September 30th you have a couple of days left, and if it's December 31st then you have a few months left to be fully compliant.

The other requirements in that section remain unchanged. Also important to note is that only goods and services that are directly charged to the award are included as procurement. So, if it's a direct cost related to the grant program those would be covered. Any indirect cost of course would not be covered in that. Most of the language from the OMB Circular A-102, that's what was used to develop the requirements in the Uniform Grant Guidance, but now that everything has been incorporated, non-profit agencies that use to follow A110 are now lumped up and everybody is included or all of their requirements are included in the one stop shop, which is the Uniform Grant Guidance.

It's going to apply to any expenditures of money that you receive from federal grants or through an intermediary. So if you're a parent agency your sub-recipients are also required to be fully compliant and they, too, have to have documented policies and procedures and make sure that they reflect the federal laws, Uniform Guidance Standards and any state and local requirements for wherever that agency is located. So, parent

agencies, SHFAs, local housing counseling agencies, you all are required to make sure that your documentation reflect the applicable federal laws, Uniform Guidance Standards and any state regulations for wherever you are located.

The key changes, there were quite a bit of changes that became effective with the new standards, however we have summarized for you the key changes and you can see how they relate to the Housing Counseling Grant. The first one that I wanted to talk about is that each agency—your agency and your sub-recipients or your affiliates—you must have documented procurement policies and procedures in place. So, if you already have a system in place, however there is no documentation of what that system is, then you're not in compliance. So, you have to make sure that everything is on paper, it's been vetted by your procurement department, if you have one, and your executive director and that it's fully implemented.

Another change that was affected is that agencies they should focus on the most economic solution when they're trying to procure goods and services. So, basically you want to make sure that you're avoiding—that you're not using federal funds for any unnecessary items. You want to make sure that you're looking at the most economic choice when you're

making your selection. Another thing that changed is that you must have a written conflict of interest, policies and procedures in your code of conduct, and we're going to spend a little bit more time on that in a few minutes on a slide that's coming up.

The steps and activities that are required to complete your procurement process they have to be established and documented as well. So, not just your policy, but all of the procedures that will go along with each policy and making sure that the policies are being carried out properly, those two have to be documented. Also in your procurement files you want to make sure that the files are complete. For example the basis for the type of procurement or the contract type and the basis for the contract selection and price, all of that information has to be documented and how your agency determines that has to also be documented as well.

Another thing that changed is that agencies who receive federal funds they have to maintain the appropriate level of oversight of the program or of the procurement function just to make sure that it's being performed in accordance with the terms of the contract and making sure that you guys are in compliance with the Uniform Guidance Standards.

Another major thing that changed is that you guys or agencies are now required to have full and open competition, and any contractor that assisted with defining the specifications of any request for proposals those contractors cannot compete for those opportunities. Another thing to note is that any request for proposal specification it has to be reasonable so that you're not limiting the competition between other competitors in the pool.

Another thing that changed is that the procurement, you cannot have any geographical preferences unless the federal law either required a geographical preference or encouraged a geographical preference. Otherwise, that's strictly prohibited under the Uniform Guidance.

There are five methods of procurement currently, and we're going to spend a little bit of time talking about each of the five. You would pretty much take a look at purchases that you make in your agency to see which one of these categories or methods of procurement you would need or you would use based on the types of services that your—or based on the threshold and the types of services that you're trying to procure.

So, the first one this is described as micro-purchases, and it's for supplies or services that don't exceed \$3,000 in total. That threshold however is

\$2,000 if it's for construction. If it's possible the Uniform Guidance encourages agencies to make sure that they're distributing the purchases equitably among the different suppliers. In this section the price must be reasonable. You don't need competitive quotes, but you still want to take a look at various different prices so that you can choose the most economic price.

The next category is for purchases greater than \$3,000, but less than a \$150,000. Small purchases are suitable for you would still get a price or a rate quote and you want to make sure that you're obtaining sufficient documentation. You're also making sure that you have at least one price or rate quote when you're looking at small purchases.

Sealed bids, these should be formally advertised to the public, and it's for purchases over a \$150,000. This is appropriate whenever you have enough time to do the solicitation, the submission and you have enough time to evaluate the bids that you receive, there is also enough time for you to make an award based on the price as well as other factors that you would be looking at. And it's also suitable for when you're not necessarily going to be following up with whoever submitted a sealed bid. And again it's important to know that you need to have at least two

responses whenever you do this type of procurement. Another important thing is that there must be a cost price analysis done and whoever you awarded to will receive a fixed price contract.

The competitive proposal is used whenever the sealed bid is not appropriate. So, for example, if it's necessary for you to have discussions based on the submissions from the offerer then you may want to consider using the competitive proposal. Also it should be formally publicized and include an evaluation criteria. The agency has to receive at least two proposals. They also must do a cost price analysis of the proposals that you receive.

Once the contract is awarded then it's going to be awarded to the most advantageous program. So, you're going to be looking at the price, but additional factors will also be considered. And it's going to result in either a fixed price or a cost reimbursable type of contract.

The last method of procuring goods and services relates to pretty much sole sourcing, so there is no competition here. You usually use this when there's only one source available for you guys to make the purchase from, or there is a need that doesn't allow enough time for you to do a

competitive solicitation. Or you can also use it if you're federal agency or if you're a sub-grantee, your pass-through entity approved a noncompetitive proposal. Another factor that would allow it to be eligible for use is you've already submitted some type of a competitive proposal or solicitation before, you didn't receive any offers then it may be appropriate in that instance as well.

The Uniform Grant Guidance part 200.318 is described for us the requirements for conflict of interest standard. It says that agencies must maintain written standards of conduct covering conflicts of interest that's going to govern the actions of employees that are engaged in the selection, award and administration of contracts. So, no employee, or officer or agent of your agency that's involved in the award or administration of a contract that's in connection with your Housing Counseling Grant none of those agencies can then have any type of conflict of interest with a contract. So, you want to make sure that your agency has policies and procedures in place for how would they treat any such conflict that may arise, also what constitutes conflict of interest and how would that be addressed.

So, to reiterate you want to have a written code of conduct governing your procurement personnel, so for everyone who's in your procurement department there should be a written code of conduct included there. You want to express that no participation in procurement should happen if there is a conflict of interest. They can't be in the award process or selection process or anything like that if there is going to be a conflict of interest. And also there should be no soliciting or acceptance of favors, gratuities, or any kind of monetary value from your consultants or your vendors as those are the types of things that would pose a conflict of interest.

In the next section we'll talk a little bit about sub-recipients versus contractors because I know this has probably been a fuzzy area for especially parent agencies or agencies that have sub-recipients as well as contractors who carry out part of the Housing Counseling Program. So, the first thing with the sub-recipient, you know that a sub-recipient receives funding directly from parent agencies. There is an agreement between the two. It is expressed that the relationship of a parent and the sub-recipient where the parent agency will be monitoring the activities of the sub-recipient. The sub-recipient knows that they're receiving federal funds

and the usage of the federal funds have to be in line with the notice of funding availability of how that relates to the award that is being given.

So, the sub-recipient is pretty much carrying out a part of the award by performing the housing counseling services, but the relationship is what's going to determine between the sub-recipient and the contractor. On the contractor side, there is not that relationship of a parent and a contractor. The purpose of the contractor to obtain goods or services for the parent agency's benefit and not necessarily for the benefit of the federal agency. So, they do provide goods and services within the normal business operations, and similar goods and services are provided to many different purchasers. They also operate in a competitive environment so they, too, may be going after seeking jobs to provide housing counseling services, but in a contracting nature versus as a sub-recipient of a federal award.

We do recommend the following implementation approach. The first thing is to have a procurement readiness checklist where agencies are encouraged to identify the ultimate owner of the procurement process. So, who's going to be responsible for the policies and procedures and the ongoing compliance of the procurement function? We also encourage that you review the Uniform Guidance Standards in detail, and then you

determine which one would apply to your agency based on the type of procurement activities that you will be involved with and then see what's required from each of the standards. So, for example, if you're only making small purchases and perhaps you don't need to concern yourself with documenting policies and procedures for a competitive proposal because the level of purchases that you would be making does not exceed the thresholds.

We also encourage that you conduct a compliance gap assessment. That's pretty much where you're comparing where you're at today versus where you need to be. So, look at your policies and procedures that you have in place. Look at what is required and see what needs to be done to get you to a place of being fully compliant where not only are you following the new requirements as far as the implementation part, but you're making sure that the policies and procedures that you have in place are also reflective of what's being done.

We also encourage that you update, or if you don't have them already, then you develop certain forms and check lists such as the request for proposal templates or proposal evaluation forms and make sure that this is a standard process that each person in the procurement function they know

what the different tools are that should be used and when those tools should be used. We also encourage that you update your contract standards and templates just to make sure that the provision in the contracts are expressed as such that these are contracts and that they are also in compliance with the Uniform Guidance Requirements.

We also encourage that you ensure that each staff know the who, what, when and how the procurement activities will be conducted. So, if everyone is not on the same page then you want to provide training to them to make sure that everyone gets up to standard. If you have sub-recipients we also encourage that you take a look at what they have documented because you're responsible for making sure that they, too, are in compliance with the Uniform Guidance Requirements. So take a look at the policies that they have in place and make sure that you have an oversight team that's making sure that they're being held accountable and that their procurement of goods and services are properly documented as well.

You also may want to consider a standardized process by which your staff would assess the procurement documentation to make sure that's easily accessible for hard review or audit review. Again train your staff on the

new requirements, and also if you've updated your policies and procedures you want to make sure that they are properly trained as well. And finally we do want to recommend that you communicate to them a clear resolution process for how they go about any questions or issues or concerns that may arise with the procurement function.

Based on the reviews that we have performed, we have developed some best practices that we wanted to share with you and hopefully you'll find these helpful. The first thing, again, which we cannot stress enough is that you must develop or update your written policies and procedures for the procurement function. Again if it's not written then if you guys did have a review then it would be seen as it does not exist. So, you want to make sure that everything is documented.

For each of your thresholds you want to document the various thresholds as they may apply to your agency and the appropriate processes for each of the different types of procurement methods if it relates to your agency. How would any conflict of interest that may involve your employees, how would those be addressed? Any conflicts of interest that may affect your affiliates or subsidiaries, how would those be looked at and addressed as the organizational level?

Another thing that we encourage is that you consider centralizing the purchase operations. Whenever you have just one department that's focusing on the procurement function, that's going to reduce the risk of noncompliance with requirements. It's also going to standardize everything for you. Servicing would be done consistently. There will be less room for error.

Another thing that we encourage is that you create checklists and templates and you document the different steps for the decision criteria for each of the different procurement methods. What are the procedures for uncovering or managing any conflicts of interest that may arise? Also create checklists or documents for the required documentation that has to be included with each procurement file.

In our experience these are the common weaknesses that we've noted in the procurement function, the first one being a lack of file documentation. A lot of times we'll see where files are pretty much incomplete. They don't have enough proposal or doc evidence to show that they received at least two proposals for a sealed bid or a competitive proposal. We also see cases where there were no approvals to use the certain vendor. There

are no approval processes. Also failure to show existing procurement procedure, there really have been no documentation in some agencies at least to show how did this agency actually procure these goods and services. There are no approvals, no sign offs anywhere. What is the process that should have been performed to show a proper system of internal control?

Another weakness that we've seen is lack of competition in small purchases, and again you just want to make sure that you're looking at not just the first bid or the first proposal you received. You want to do your due diligence to make sure that you're making the most economic choice and looking at other factors that you may include in your procurement process. The final one is unauthorized commitments to vendors where we've had that experience where agencies will procure items from unauthorized vendors. And that just shows that there was a weakness in the internal control system.

Some frequently asked questions related to procurement, the first one says, "How are procurements of micro-purchases and small purchases under the simplified acquisition threshold less burdensome than those above it?" And pretty much they require a lot less documentation. You're required to

have fewer terms and conditions for how you award those contracts or how you make those purchases versus if you were to do a sealed bid or do a competitive purchase.

The second question is asking, “Does the Uniform Guidance Standards apply to indirect cost?” And the simple answer here would be no. It applies only to direct cost related to your HUD grant.

“Does the Uniform Guidance require nonfederal entities to limit charge card purchases to a particular threshold amount?” The answer here is no. There’s nowhere in the guidance that limits the charge cards or that puts a limit on the amount of charges you use on your charge card.

The next question, “Can you clarify what is allowable to hire or contract without competitive bidding?” Pretty much that would be when you’re doing a single source or a sole source. It pretty much would have to meet the first criteria of—if it’s a contract above \$150,000. So, if you’ve met that criteria then you could then look at whether or not probably you’ll try to get a sealed bid or a competitive bid and there were no responses, or if your federal agency had approved such purchase then you could take a

look at that. Or, if that's the only vendor available to provide that good or service then that vendor would be considered for the single sourcing.

“To what extent does the Uniform Administrative Requirements align with the Federal Acquisition Regulation? Can the Federal Acquisition Regulation be used as a prevailing guidance where there are questions?”
So, the Federal Acquisition Regulations pretty much are standards for the federal agencies to follow. The Uniform Guidance is guidance for recipients. Like, local housing counseling, agencies, intermediaries and their sub-recipients, SHFAs, MSOs that's where your guidance come from. So, if there's ever a question or a conflict or any—

Moderator This is Allen with AT&T TeleConference Service. We seem to have lost our host line for one moment. Just one moment please. Speakers, can you check your lines for your mute features, please? It looks like your line may have gone mute.

M Can you hear me?

Tracy I can hear.

M I'm texting Petergay now.

Moderator We're showing her line is still connected. Ladies and gentlemen, on the telephone lines please continue to hold while we try to reconnect here.

We have reestablished your host line.

Tracy Okay.

Petergay Hello.

Moderator You may proceed. We have reconnected you into the conference.

Petergay Thank you. I do apologize for that. I'm not sure what happened. We were just about to talk about the listing of available assistance that's been provided by the Office of Housing Counseling. And what I was saying before is that HUD realizes that agencies may need assistance to either update or fully develop procurement policies and procedures as well as they needed assistance with training their sub-recipients. So we provide an array of different types of assistance in various combinations that we'll go over now.

The first would be in the form of a technical assistance and this is where we would work with your agency to actually develop from scratch your procurement policies and procedures. So, if you wanted us to help you to draft the policies and procedures, develop the templates for you to use that assistance is available. That is something that we would work with you for a specific timeframe for as long as it would take for us to get you the documentation that you need so that you could then share with your agencies and get it implemented.

Another thing that we do is we provide training to agencies, like one-on-one individual training, where we would actually come on site or we can do it remotely and train agencies as well as any sub-recipient on the procurement standards. Because, of course today, the procurement function is so broad we wouldn't be able to fully even touch like 20%.

Moderator

Ladies and gentlemen, we are experiencing technical difficulties, please standby. This is Allen with AT&T TeleConference Service, I'm having difficulty reestablishing Petergay Bryan's line on the conference. I just thought I'd let the other speakers know that.

Tracy It looks like she just was like—the thing just changed as if she's still talking.

M It looks like she was wrapping up and I didn't review enough of this, so I don't want to speak when I didn't review it.

Tracy Yes, I know it's not quite an easy subject.

M Hold on, I'm going to click over and try to call her.

Tracy Okay.

M Oh look now she is—please forward any questions to housing.counseling@hud.gov. Tracy, what do you think we should do? Because that were the last two slides, the reference page and now she's saying thank you.

Tracy Do you think that nobody else heard her?

M No, we all can't hear, but the last two pages were the reference page and a thank you page. It wasn't any detailed information.

Tracy Alright, maybe if you want to just step in and say since maybe about— since there was difficulties and she probably still kept going and if they have any questions just to make sure.

M That they send their questions to housing.counseling@hud.gov.

Tracy Yes, because she doesn't realize that she can't be heard.

M Alright, go ahead. Alright, I'll step in. In the presentation, I'll let everybody know if they have any questions to please forward them to housing.counseling@hud.gov.

Tracy Okay.

Moderator We are establishing Petergay Bryan's line.

Petergay Hello, everyone, I want to apologize again for having dropped off. I'm not sure what is happening, but we're having some technical difficulties here. I think where I was when I dropped off, I can't be sure, is when I was explaining the available services that HUD provides. The first one being technical assistance, and this is pretty much for agencies and sub-

recipients that they don't have any policies and procedures in place currently and they need help to develop those policies and procedures. They need help to develop any templates that they would use. That's the type of services that we provide under this function. We could either provide the service onsite or remotely, whichever method is easy or more beneficial to the agency, that's the option that we would go with.

The next thing that we do or the next type of service would be as far as training. We provide one-on-one training with each agency that's interested. So, we can either come onsite or do it remotely as well. We provide training to parent agencies and sub-grantees, LHCA's, on how to draft the procurement policies and procedures, how to make sure that it's implemented properly. We train you on how to develop your templates and things of that nature.

We also provide assistance through action plans and this is the type of service where we look at your current policies and procedures that you may have and see—we compare that to the Uniform Guidance to see if you are in compliance with the standards. If not then we work with you one-on-one to update your drafted policies and procedures. We'll also

work with you to develop any templates that you may need to make sure that you're in compliance with the new requirements.

If you were interested in receiving this then you would request assistance firstly from your HUD POC where you shoot them an email. You let them know that you need assistance with whatever type of service, be very specific so that we'll know the services that you may need. Once the HUD POC receives that information and they approve it then they forward it to the HUD GTM. The HUD GTM then forwards that information to Booth Management Consulting and then we would pick up the phone and give you guys a call.

For example, if it was to develop an action plan where you already have something in place, but you're not really sure if it meets the new requirements then we pick up the phone or send you an email asking for your existing documentation and we would compare that to what is required. We would inform you, okay you have these five elements that are needed, but you're missing three, and then we would help you to develop those three additional elements that are missing. Or if it's something where you don't have anything in place then we provide technical assistance to you where we actually draft those for you and

provide you with any templates. Remember we also provide the service to any sub-recipients or affiliates that you may have.

Based on our experience the benefits that we've noted to grantees is that first and foremost it does minimize the administrative burden to agencies that are now required to be in compliance with these standards. Instead of you having to do the work then we have experienced professionals who actually do the work for you. Of course it would need your sign off, so you would take a look at whatever we produce and see whether or not it aligns with your business function and your business practices and then you would approve it. If not we'll work with you until we get to that point.

The other benefit that we've noted is that it reduces—it could potentially reduce any finding during your performance or your financial review if you guys are in compliance or the policies and procedures were properly implemented and being executed. It would also provide you with financial and administrative assistance that you could carry forward in any other program that's federally assisted. And also a key thing is that it would remove or reduce the administrative burdens to pass-through entities because we provide this training to sub-grantees as well.

Here we have a listing of sources, resources or references that you could use. Again this PowerPoint presentation was previously provided to you. It should also be in your control panel under the Handout section, but if you still don't have access to it you can send an email to housing.counseling@hud.gov, and we would be happy to send it to you at that place as well.

If you have any further questions that haven't been answered today you would send those questions to that email address with Overview of Procurement in the subject line and that would help us to route the questions to the correct individual to get back to you as soon as possible.

Delbert, did you have any questions in the queue for me?

Delbert

No questions.

Petergay

Okay. I want to apologize again for the technical difficulties that we did have today, and I want to also thank you for joining us. Hopefully, you found this information helpful. If you have any questions please shoot an email to housing.counseling@hud.gov. If you are interested in receiving

any one-on-one training or technical assistance then please shoot an email to your HUD POC letting them know the type of assistance that you may need, and then they will route that information through to us and we'll be contacting you soon.

Again, thank you so much and have a good day.

Moderator

Ladies and gentlemen, that will conclude your conference call for today.

Thank you for your participation and for using AT&T's Executive TeleConference Service. You may now disconnect.