

## **Single Family Rehabilitation & Reconstruction Programs, 8/20/20**

Bonnie Newcomb: And welcome everyone and thank you for joining us today for our presentation on the single family rehabilitation and reconstruction programs. This is the first webinar of our summer webinar series, and there's seven more webinars scheduled in the series. Again, my name is Bonnie Newcomb, and I'm a CDBG specialist in HUD's Disaster Recovery division.

Today's webinar will go through the foundational elements of Community Development Block Grant Disaster Recovery and mitigation funded homeowner rehabilitation and reconstruction programs; exploring program design and program launch; the intake, eligibility and award process; the construction phase and finally closeout.

The presentation will also take a deeper dive into the pros and cons of the different types of rehabilitation and reconstruction programs and include some critical lessons learned from prior CDBG-DR programs. We will have time at the end of the presentation for questions and answers. So please use the question box to type your questions, and we will do our best to answer your questions at the end of the presentation.

Presenting today we have Sue Southon from ICF. Susan has over 30 years of experience in community economic development and affordable housing production. She has managed in several technical assistance engagements for HUD in states including Michigan, where she provided senior expertise on program design, organization structure and staffing requirements, budget development, regulatory compliance and project underwriting.

She has assisted major disaster recovery initiatives to develop housing recovery programs, organization structure and staffing projections. She is a subject matter expert in redevelopment, program design, policies, procedures, document templates and checklists and provisions of TA with regulatory issue.

We also have Kelly Price from ICF today. Kelly has over 25 years of professional experience in planning, affordable housing and community development programs. And she currently manages large TA projects for HUD, its grantees and partners across the country as well as direct state and local government clients.

She provides guidance to state and localities in various programs including CDBG-DR, Home, HTS, NFP and Renew 300. She designs and delivers training courses across the country and develops handbooks, toolkits and other products in a wide range of affordable housing and community development programs. Ms. Price is considered a national expert in CDBG and CDBG-DR. And she is sought by states and localities for guidance on cross-cutting topics such as environmental review, labor standards, fair housing, financial management, and Section 3 economic opportunities.

I'll be turning the presentation over now to Sue so she can start our first poll.

Sue Southon: Thanks, Bonnie. Let me start by saying now that you've heard a little bit about us, we want to know a little bit about you as we get started. So what we'd ask you to do is respond to the poll with your sense of where you are as it involves the development of large-scale -- and by large-scale, you're all disaster grantees or MIT grantees, so you're dealing with a lot of different and generally speaking, fairly large projects -- but what your experience is with rehabilitation and reconstruction programs. Do you consider yourself very experienced, somewhat experienced, experience with small rehab programs only, or no experience at all? And we'll give you a minute or two to respond to the poll.

Okay. Do we have our polling data yet? I'm going to give folks a minute or two more. Okay. So we have a pretty good mix. We have about 18 people of our group that are very experienced. We have a pretty significant group, about 50 that have somewhat experience or experience with small programs. And then we have a similar number that don't have any experience. And some of you just want to go incognito on this, which is perfectly fine.

So let's begin here. Okay. Again, welcome. We're delighted to have you with us today. Most of you are going to run a homeowner rehab or reconstruction program at some point in your recovery process. For many of you, because it's the most pressing need for your citizens, it will be the first program that you launch.

While developing and implementing your homeowner program is one of the most important steps to recovery, it's also one of the most complex. So what we hope to do today with this webinar is to break down the steps to designing and running a homeowner program so that you know just what you need to do at each step in the process.

This is a very broad overview of what we're going to talk to you. And Bonnie mentioned this a little bit with her introduction. So we've divided into four major categories, basically program design and launch, which is all of the pre-work that you do with your action plan and getting yourself ready to go.

And then intake eligibility and award is when you open your doors, start working with applicants, do damage assessment and eventually make your awards to begin construction. And then you've got the construction phase, which is by and large the longest phase of your program, and then closeout.

What we've also done is divide these larger four categories into kind of subcategories or additional steps. And we're going to be running through these. This diagram shows you the major activities you're going to undertake as you design and launch your program. And then as you move applicants from your intake process through to your award closing and your subrogation agreement signing.

And then this next slide that you're going to see involves your construction phase of your program, fewer steps here but definitely a bit of a complex process, and then finally your program closeout.

So let's start with program design and launch. There are basically four major elements that you'll be undertaking in the design and launch of your program. And these are determining your program design. And some of this you'll be doing as you develop your action plan. It happens to a greater or lesser degree. It's entirely up to the grantees how much detail on the actual procedures you may want to put in your action plan. Sometimes it's better to give yourself a little bit of flexibility until you know exactly the cohorts you're going to be working with and how you want to design your program.

The next step is developing your policies and procedures. And you're going to be doing that both to the program itself and for any of the cross-cutting federal requirements that are going to come into play that your program is going to trigger. And at a minimum these will probably be environmental review, Section 3, and uniform relocation. And with that one, you may have both involuntary relocation of tenants and involuntary relocation of homeowners.

You may want to decide at some point early in the process that you want to use sub-recipients or a contractor to carry out pieces of your program. And you're going to want to finally think about how you want to design and implement your community outreach, what mechanisms you're going to use to publicize your program once you're ready to launch.

To let's think first a little bit about program design considerations. You're going to make some initial decisions regarding who you want to serve with your program. And these decisions will be based largely on your unmet needs assessment that you're doing in conjunction with your action plan development.

However, if your needs significantly exceed the financial resources we are going to have available, you may opt to further prioritize the populations you will serve. Or you may choose to phase a program, helping those with the most dire needs first. This slide illustrates some of the threshold decisions that other grantees have made when designing their program.

You'll need to make a decision regarding maximum amount you want to spend to replace or repair a home. And this decision is typically driven by an analysis of the cost of labor and materials balancing how much is required to repair or replace a home with the number of households that you're going to need to serve.

Oftentimes grantees will develop a few typical models for home reconstruction, say a two-bedroom, a three-bedroom and a four-bedroom model, and cost those out. And that can assist you in making a decision regarding a reasonable program cap as well. Clearly areas with higher [inaudible] cost of construction are going to require higher caps to effectively serve their impacted population. Using staff or contractors with experience in rehab is also very helpful, as rehab is often much more complex than building a brand new structure.

Some additional design considerations are will you allow for any kind of reimbursement, and some of these will be driven -- some of these decisions are going to be driven by the need and the general characteristics of the population you're going to serve. Now reimbursement, while an option at some of the DR programs grantees have used, it will not be an option for MIT grantees.

You may also find that grants are the easiest to administer, as they don't require a grantee to monitor residency over time. You will also -- and this is grants versus some kind of loan or forgivable loan. You're also going to find, I believe, that you're going to get more applicants with a grant program than the loan program.

Some program given a level of investment prefer to structure awards as forgivable loans. While they may have no repayment requirement and can be reduced to zero over time, they do require that the applicant homeowner remain in the home for a fixed period of time.

Just as a side note, in our experience, elderly residents are more reticent to -- reticent to apply if the program requires any kind of a form of a loan, even if it's a forgivable loan. If your disaster impacts a population that includes a large number of elderly households, this may be a consideration for how you want to structure your award. And you're also going to need to decide the model you intend to use for construction. We're going to cover the pros and cons of each of these on some later slides.

Written policies and procedures are going to be critical to your program, as they govern how your program will run. Expect to modify them over time but always be sure that the written policy reflects your actual practice. It's natural that you may want to alter aspects of your programs once you begin implementation. Just make sure that you reflect these changes in your policies and procedures and that you institute a continuing updating and training process for all staff involved in your program so that everybody knows any time a change is made.

The list you see on this slide reflects the various elements you'll want to include in your policies and procedures, though it's going to be outreach, intake documentation required, eligibility determinations and DOB documentation, any procedures that relate to any of the cross-cutting federal requirements that you're going to need to implement, construction, inspection procedures, and standards, award requirements, oversight, financial management, grant reconciliation.

I'm going to turn this over to Kelly Price because she's going to talk to you about some additional considerations at this point.

Kelly Price: Great. Thank you, Sue. Good afternoon, everybody. I'm going to pick up where Sue left off in the early phases of thinking through your program design and how to launch a program or ramp up start a program. And those aspects that I'll speak to are going to pertain to the people, the physical infrastructure that you need, as well as the systems and backroom support you might call it that you might need to set up a program of the magnitude that typically is required for -- for effective disaster recovery.

So one of the elements as you're thinking about your program design and trying to work through your policies and procedures and how you're going to carry out these programs is to early on analyze your capacity.

And, in fact, now in the more recent CDBG-DR grants, the issue of staff capacity and overall program capacity and of your partners is a required element that you need to speak to in the documentation that some of you as new grantees are currently in the process of preparing to

submit to HUD with your certifications and other information that's required. So this actually comes even earlier in the process and sort of forces you to think through whether or not you have the capacity, and if you don't, how you're going to get that capacity.

So in housing rehab programs, those of you who indicated in the poll that you've run these kind of programs before understand that housing programs in general and particularly rehabilitation/reconstruction type programs working with homeowners and potentially some rental units is labor-intensive. It's a labor of love, labor-intensive program type. And so it does require very careful analysis of the staffing and/or outside assistance that you're going to need to effectively run those programs.

And new grantees who either haven't carried out housing rehab/reconstruction before or who have but on a smaller scale like a normal sort of regular CDBG program have to scale up significantly. And I think one thing we see in our work is that a lot of grantees underestimate what's required and just simply how many people at what different positions and stages of the process that they need.

So there is a tool that has been provided for you. Hopefully folks on the call today are signed up for the HUD Exchange listserv that you can get that provides information to you about all things CDBG-DR from the HUD Exchange. But on the HUD Exchange CDBG-DR mini site as we call it or the website where all the DR information lives there are a number of resources there.

And one of them is a toolkit, a launch toolkit. And in that toolkit is a staffing analysis tool that we find to be very helpful and have applied it in working with some of our grantees that we've worked with in that it helps to think through all of the different positions that might be needed for the different programs. And I'm going to toggle myself over actually to that right now.

That tool helps you think through the different components from financial management, to the intake, to construction management, to your various systems and maintenance and upkeep of those systems, to reporting, to outreach and marketing, to the cross-cutting other federal requirements that Sue hinted at earlier. So I'd encourage folks to go to that tool and look at the different sort of facets of staffing or buckets of sort of groups of people that are needed.

And it'll walk you through in a couple different ways how to estimate the number of folks, the level of effort in terms of FTEs or what have you. And then it'll sort of guide you through thinking whether or not those are folks that need to be hired in-house. Maybe a staffing firm or that sort of thing can be used, or contracting out for various services, or partnering with an organization, which I'll talk about more in just a minute.

So I definitely recommend utilizing that tool as well as the information that HUD requires regarding capacity so that you are thoroughly thinking through that component of the program and how it's going to work.

The other thing to think about -- I think Sue will talk about a little bit later as we work through the different stages of the program when she showed you the sort of flow chart earlier -- when you get to the stage of intake, award and moving onto construction, you have different staffing

needs than you do in the beginning. And you're going to have different staffing needs than you will when you start to wind down.

So we'll talk more about staffing as it plays into different facets of the program as we talk more about that through the webinar. For example, during construction, you need specific types of folks during construction that have expertise in cost analysis, in inspection, damage assessment and that sort of thing that are different from the types of people you need early on to do the intake and the income documentation and duplication of benefits and award calculation. So thinking through the different program areas, thinking through the different phases of your program and the different parts and pieces of effective program foundation that need to be staffed up is super-important.

The other thing to think about is infrastructure and real estate needs as we have it on here. I'd call it more of the logistics side of things. So just like any other business, when you're starting a new program, think of it as launching a new business. Where is that business going to be located? Who's going to be located where? What makes the most sense in terms of being accessible to the public, what makes the most sense in terms of the infrastructure that is going to be needed in terms of technology, safety issues, issues --

I live on the coast of North Carolina, so I can tell you that we have to always consider that sort of thing in the context of hurricane season. And so I know in the state of Florida, for example, recently with their recovery efforts, they've had to really think through backup plans for their offices and their technology so that they cannot be as interrupted as -- as you might normally be during the storm season.

So thinking through all of those issues, contracting for office space, thinking about where those intake centers are located in relation to the folks who need to get to -- into those centers and what the hours of those centers are, computers, you know, lights. Everything has to be thought through.

Technology obviously super important and access to that technology to be able to effectively serve your grantees. We've seen some programs that, you know, literally are working off Excel spreadsheets and some that have really great handheld, you know, pads and mobile devices that they're utilizing in their programs and everything in between. But those things have to be considered. So think about that -- that infrastructure and physical space. And then lastly, of course, not lastly in terms of the order of importance, but the other item would be the technology behind all of this.

Again, we see often that grantees may have sort of a basic financial management systems, for example, that they use for their accounting and budgeting and whatnot. Some folks are used to, say, IDIS, which is used in the regular CDBG programs of HUD but maybe not so used to DRGR, which is the system that is utilized for disaster recovery.

And, in addition to that, you're going to need some new systems and some more collaboration with different software and different data feeds and whatnot for the purposes of the intake and

the client management, all the way from the point at which someone applies through completion of construction and closeout.

So thinking through what are those options, talking to your fellow grantees that are out there that have done this before, finding out what worked for them and what didn't. In some cases, there's off-the-shelf solutions, and in some cases, grantees have created their own -- their own systems. But it's very important, particularly on the financial side, on the grant management side, to think through those systems, software packages, whatever you want to call it and the technology side that goes with that. So those are just a few things.

Again sort of related to the comment earlier about staffing and thinking through how you're going to get these programs accomplished is on the staffing side of things, again this tool helps you think this through a little bit, but really there's a good bit of research and reconnaissance that has to be done based on your own market, your own jurisdiction, your unique needs you may have.

Trying to run a disaster recovery program on an island in the middle of the ocean that may be separate from the mainland of the United States, for example, presents challenges with regards to the staffing and partners and vendors and contractors whereas, you know, other states may have more accessibility particularly in the larger cities to be able to do that.

So thinking through the reality of hiring up positions and whether those positions are long-term positions or short-term contract positions, part-time, full-time, whether or not staffing firms could be used or other types of private vendors that could be utilized to provide types of employees for different phases of your program, that's a model we often see particularly around intake and to some degree around construction.

And thinking through, again, always have in front of you the thought of not losing those cross-cutting other federal requirements, making sure that the environmental Tier Twos, which we'll talk about in just a minute, are completed by the right kind of experts, that someone is in charge of relocation and that's integrated into the intake and case management process. Thinking through Section 3 and language assistance, LEP activities, fair housing, that sort of thing. So those specialized positions may require some specialized outreach to fill those positions or, again, some sort of contractual arrangement with a firm that may have that expertise.

So lots of different options to consider. Again, what we see that plays into that decision will be other than your typical sort of management and political and state procurement rules and that sort of thing, but other than that, it's really about location, what is available to you, what is really reasonable to expect in terms of responsiveness to job hiring and to procurement in terms of things you might put out there for folks to apply for. So thinking through that -- and again, you'll have some of the staffing surges at different phases of the program.

So it's important to anticipate that and write your -- both your job descriptions and your contracts and your procurements in a way that reflect that so that you're not either shortchanging in terms of underestimating how long you may need different types of folks around to help with certain phases of the project but also not -- not having contracts that run longer than what you may, in

fact, need and then you're stuck with some sort of obligation for payments or something like that over time. So really important to think through those different phases and chart those out.

Finally -- and we'll talk about this in just a minute also as it applies to the different types of models of programs or different program designs you might set up is to really get to know and understand, meet with, analyze the capacity of potential partners in your area, in your state, in your region depending on the disaster and the grantee type.

But other state agencies -- oftentimes states will look to their other state agencies, whether, for example, it's an agency that only does environmental work potentially to help with the environmental side of things, housing authorities in some cities, states, counties that may have some additional capacity or experience. Of course, there's a range of nonprofit organizations in communities that might be able to ramp up an existing program and provide support to this new DR program, the different types of nonprofits like CDFIs, community action agencies, housing counseling organizations. Those kind of groups work on the frontline of dealing with folks who are in crisis and might need help with their rent or mortgages or be displaced because of a disaster. So they're important to think about in terms of your intake in particular.

And then, of course, private developers and private companies who specialize in different aspects of disaster recovery or just simply in different components of the systems that you need. We talked about the grant management systems and things like that looking out in the world to see which companies provide those services and thinking through how your procurement might work if you decide that that's the route you need to go.

So, again, think about roles that need to be filled at different phases of the program, whether those'll be part-time, full-time, in-house positions or you need to go out and look for firms or other expertise. And look to your partners as well and what capacity they may have. Again, the staffing analysis tool will help you kind of think through these ideas and put together a plan, if you will, that you can then implement.

Again, I highlighted a minute ago beyond thinking through staffing and the physical infrastructure and the systems, the other component sort of tagging onto Sue's earlier information about thinking through program design is where we take all that information we've gathered about which way we want to go with staffing, contracting, partnering and we fold that in with the early program design work that she mentioned earlier, taking your data, unmet housing needs and all of that information and then deciding on a program model. So what is the sort of basic way we're going to carry out this program?

And while there may be variations or additional creative ideas out there, the ones on your screen now are sort of the basic ones that we see commonly. Again, there's another tool on the HUD Exchange within the launch toolkit that provides three pages of information for you on these different models as well as more information in seeking out and talking to your local partners.

The first model is the direct implementation model. This model is exactly what it sounds like, which is that the CDBG-DR grantee directly implements the rehab/reconstruction program,

typically with its own staff or hires, although some direct implementation models will also utilize vendors and contractors and consulting firms to help with different parts of the program.

This is where a grantee is in the driver seat. The grantee is making all the program design decisions, carrying out the implementation day-to-day, doing all the procurement, all the staffing, all of that sort of thing at a centralized place, in a centralized way. And I will talk in just a minute about some of the advantages and disadvantages of that model as well as the others.

The other -- the next two are sort of similar, just a little bit of a variation in them. But essentially this is where instead of directly implementing the entire program start to finish, a grantee may choose to partner with another organization, again maybe another state agency, a large nonprofit, a public housing authority, something like that either for carrying out the entire program or to carry out some major facet of that program, so a partnership model.

If you're going to do that kind of model, a partnership model or even the next one, method of distribution model, we would encourage you to really think through that entity's capacity, existing capacity, what their track record is, their audit record, their systems, but also what's their capacity to ramp up and take on a program of this magnitude. So you would apply the same thinking, the same analysis, the same planning that we talked about just a minute ago regarding staffing and functions and physical space and systems to that partner, to that method of distribution recipient or subrecipient because they're going to have to adhere to those same requirements.

So many grantees now are doing sort of capacity assessments at the partner/subrecipient local government level to ensure that they are, indeed, getting into a relationship and partnering with an organization that can, in fact, effectively carry out the program in a compliant and timely way. So looking at your partners is totally fine for all or parts and pieces of a program, but just know kind of what you're getting into. And, again, we'll hit some more of the pros and cons of that in just a minute.

The third method here is -- or excuse me, the third model that we talk about often is method of distribution model. For those of you on the webinar today that are state grantees -- and some of you may also be what I call regular state CDBG grantees -- your use of this terminology, basically what we mean by this is that typically at a state level but it doesn't have to be, but that a state is determining some sort of formula methodology or some sort of clear, transparent process by which it is deciding to allocate a certain amount of funds to local governments to carry out a program in their area.

A number of state programs have done this in the past where -- and, again, this is a model utilized in regular CDBG, of course, which is that it's apparent what the process is, what the method of distribution is going to be. Those local governments are then tapped to carry out the program at the local government level.

That said, the same guidance and requirements regarding capacity would also apply here, too. Just because you have a method of distribution model does not mean it, of course, absolves the CDBG-DR grantee from having to, again, carry out an effective and compliant program. It will

need to be oversight and whatnot, but ensuring that that local government can, in fact, carry out the program, staff up, get the physical infrastructure, have the right systems to really ramp up and launch a CDBG-DR rehab/reconstruction program is important.

So various models -- often, you know, there're outside factors that weigh into the decisions about which ones to use. And it's not out of the question that some CDBG-DR grantees, especially larger ones, will often have a mixed model or hybrid where they might have both going on. That kind of depends on everything from politics to geography to how widespread the damage might be in your state.

If you're the state of Florida, again, and hurricanes can take a very interesting path because of the geography of Florida; whereas some of the other southeastern coastal states like where I am, you get a direct hit in one particular area. The geography is not so widespread. So sometimes that plays into that decision. And, again, of course, capacity has to weigh into that decision. There's no way around it essentially.

This is table that I'm showing you on the current slide here just provides you a little bit more detail around the different models. Direct implementation, you'll see there at the top is sort of listed by itself, again, because it's sort of separate and distinct. This table is part of that tool that I mentioned earlier that is in the launch toolkit along with some additional information. So you'll have this on the slides, but also if you go to that launch toolkit, you'll find some additional information that might be helpful.

But, again, as we said, the pros of direct implementation models for a grantee are that you're essentially driving the bus. You're in control making the decisions around program design, staffing, contracting, timing. There's less coordination. You know, you don't have that extra layer, if you will. And you don't have to kind of deal with those potential capacity issues and whatnot that might come up if you're using other entities to help you.

Now that said, it does not mean that a state or a grantee, local grantee has to use all of its own staff. Again, you should contract out, find vendors, find nonprofit partners who can help with different aspects of the program. But the program is being driven by and carried out by the grantee.

So, of course, staffing that up and dealing with all that comes with that is -- is a -- is a big task. And sometimes, again, the political nature of the geographic nature of the need across a state may not lend itself to a more centralized model. It really just depends.

Again, the second and third models we talked about, partnership or method of distribution means that the CDBG-DR grantee potentially has to hire much less staff. They'll have to enter into agreements necessarily for intake centers and systems and whatnot. But those things still have to occur at some level.

So making sure that the partners, local governments are taking care of that at their level does require the grantee to make sure they've got oversight, that they're heavily guiding, providing

TA, providing training, overseeing and, of course, monitoring those partners and subrecipients and local grantees.

So it can help if you do have, again, damage in areas where you've got decent capacity at the local government level or if you're lucky enough to have nonprofits or other partners at the regional or local level that can, in fact, carry these programs out. Then by all means that might make sense.

However, as most of you know who've been running these kind of programs in the past, it does add a layer, right. So there's this additional layer of oversight, of compliance, of coordination. TA and training is constantly needed. Turnover is going to happen. There will be some issues. And just making sure that the unmet needs in those areas are, in fact, being met. Once you start to disperse money in different places, keeping track of all of that and the timeliness is an important aspect of the oversight. And we do have a typo there on that slide, so we will fix that before these get posted.

All right. So after you've heard all of that, we've got another little poll here for folks. Given what you've heard, especially those of you who are a number of folks who are going to be having to ramp up from an existing program and/or have not carried out a CDBG-DR program of this magnitude before, based on what we told you or what's going on in your grantee's world, what model do you think might be the model that you would land on for your program, again, the direct implementation model, a partnership model, method of distribution model, or a hybrid model? We'll give you guys a few minutes to answer that. Remember the polls are over in the bottom right of your screen. Just requires a quick click and then hit submit.

I think the poll has ended. Chantel, can I see the results just yet? Hold on just a minute. All right. So out of the folks that answered, it's looking like very few, only nine out of the folks who responded would choose a method of distribution model. And then it's fairly evenly spread actually between direct implementation, partnership and a hybrid, with hybrid actually having the most responses by just a few. We only have about half responses from our audience, but that's telling that things are really spread but method of distribution not quite as common. And I'd say that's fair to say in CDBG-DR in general. All right. Thank you. That's helpful. And, again, more information in the launch toolkit that might help with this.

I'm going to switch gears a little bit from the issue of thinking through staffing, contracting, your systems, your physical infrastructure, and how you're going to partner or not or delegate or not your program to other entities to moving back to the other items. And Sue will pick up right after this. What are the other things that we need to be considering at this early stage of our program as we're designing, putting together policies and procedures, entering into agreements, potentially doing procurements for parts of our program?

We have a slide in here just to remind folks, again, of one of the big cross-cutting requirements, which is environmental review. And the earlier on that you can start to tackle your environmental review in that program design and launch phase is really critical so that that is not going to hold you up when you're ready to start your program, particularly doing any kind of rehab or construction.

The subject of environmental review is one that we could have a whole webinar on, if not more than one webinar on. But I'll just remind folks -- and there is a great deal of information on the HUD Exchange environmental review part of the website. So you can certainly go there. There's some great information on tiering. And what we see in rehab and reconstruction programs most commonly is a tiered environmental review process. And what that tiering means is exactly what it sounds like, which is there's a phase or two-step process by which the environmental review requirements of Part 58 and NEPA are complied with.

And the reason that tiering is particularly appropriate for a rehab/reconstruction program is because you don't know what those particular sites, those unit addresses are until the applicants come in and go through your intake process and are qualified and determined eligible and made an award. And at that point, you go out and you do your damage inspections, and you start towards a construction process. So you don't know exactly who's coming in and where exactly they live. Therefore, you're not able to totally evaluate the conditions of that specific site for environmental purposes.

What a tiered review allows you to do is to sort of create a two-step process by which you can look at the general conditions in the geographic area in which the program is going to be undertaken. And that's a subject of a whole other conversation. But in some cases, that could be as large as, say, a county or a multi-county region depending on the situation and the conditions. And what you do is look at your environmental checklist and complete the checklist and go through compliance and correspondence with all the different relevant agencies for the general conditions in the whole geographic area.

What you can't do is eliminate or speak to some of the conditions that are specific to a site, which will include things like historic preservation because you don't know where the house is, much less when it was built or the neighborhood that it's in. You may or may not know about, for example, gas tanks, noise, and some of those other items that are very specific -- locational-specific.

So you can clear some broad items at the Tier One, complete the checklist, create a Tier Two checklist. That Tier Two checklist will have those outstanding items that need to be checked upon site-specific review. And you can obtain clearance. You can submit a request for release of funds to HUD and obtain a release of funds on that Tier One, and then you'll follow up with those Tier Two checklists as the sites are identified in your intake and pre-construction process.

And we highly recommend, again, that you go to the HUD Exchange site on environmental review and particularly on the tiered reviews. You have the link here. And also take note that you will want to look for the sample programmatic agreement that are in place, particularly with the State Historic Preservation Office. There's also some guidance on FEMA, some of the FEMA environmental agreements and documents that might be important for your particular program.

So that's tiered review. Sue, I will pass it back to you at this point. There we go. All right. Sue, it's all yours.

Sue Southon: Okay. Thanks, Kelly. This slide represents some things that you should consider while you're waiting for your grant agreement from HUD. You're going to be processing a large number of construction invoices. So make sure that your current system is set up to deal with that increased volume. Be sure to track your pre-award costs as they are reimbursable once your grant agreement is signed.

And probably most important and the thing we see happening the least often is track your staff and subcontractor costs that can be determined to be exempt for the purposes of environmental review. These can be charged as activity delivery or administrative costs as appropriate. For example, intake services, staff time developing policies and procedures don't need to be charged to administration. They're exempt activities that can be charged as activity delivery and can be reimbursed by your grant as such.

And the next steps are typically programmatic for some of the initial services procurement that you're going to need related to your homeowner program, for example, intake, construction management, development of construction scopes, possibly a grant management system. Be sure to follow the rules of CRF Part 200.318 through 326 or your state procurement rules as long as they have been approved by HUD. Develop contract types that are consistent with the services you need. And this slide gives you some examples of that, for example, time and materials contracts for professional services, fixed price, task driven contracts for things like intake and eligibility determination or construction management and scope development.

Get your data sharing agreements finalized with SBA, FEMA, and if possible, your private insurance carriers. As Kelly had referenced the CDBG-DR launch toolkit, there's actually a sample format in that toolkit for requesting those data sharing agreements. And finally, don't forget to set up your action plan in DRGR.

As I mentioned previously, from the very beginning, tracking document expenditures both of time and of other program-related expenses. As you can see in this illustration, monitoring, training, financial management, and reporting are the only costs which must be charged to admin. Many grantees tend to charge all their initial costs to administration when many of these are legitimately either planning or activity delivery for a specific program. Given your five percent cap on administrative costs for your grant, it's important to allocate costs accurately so that you have sufficient administrative funding for the life of your grant.

The chart on this slide provides definitions for each cost category. For example, time devoted to development of policies and procedures for a housing rehab program are activity delivery costs for that program. A citizen participation plan revision can be considered a planning cost. For general administrative costs, you don't see subrecipients included in most cases, and that's because in HUD's view, subrecipients are not doing true grant administration.

HUD is providing a lot of technical assistance around this issue because grantees continue to give admin funds to subrecipients who are actually doing activity delivery. By tracking your expenditures from the beginning, it's far easier for DRGR entry than to try to go back into DRGR and reallocate funding once the initial entries have been made.

This slide gives you some examples of how costs can be allocated. And each program that you design is going to have its own budget that will include both activity delivery and direct costs. Again, these are examples of typical activities involving a homeowner rehab program and how they are categorized. So your intake activities, your environmental review, construction management, inspections, case management, post intake are all activity delivery. Construction and relocation costs both voluntary and involuntary would be direct activity cost to the program - or direct cost to the program.

At some point, most programs are going to determine they need some outside help. And Kelly referenced this in her earlier discussion. This could be in the form of additional hired staff but could also be staff procured through a staffing agency or a firm that specializes in assisting grantees to launch and manage various aspects of their DR MIT program.

It's important to be fully aware of the procurement requirements before this first procurement. The first bullet represents critical procurement requirements that some grantees often miss. We recommend that all grantees attend HUD's procurement training. Procurement is becoming a big topic with both the Office of the Inspector General and Disaster Recovery Special Issues division at HUD. Many grantees are not properly procuring services and/or are trying to piggyback services onto existing contracts. This is not allowed.

As you can see from the slide, state grantees have three options for managing procurement. But that being said, once a procurement policy is submitted and approved by HUD, any change in that policy is going to require a new HUD review. Subrecipients and entitlement grantees must follow 2 CFR part 200.318 through 326. The secretary will certify in advance of signing a grant agreement that each grantee has in place proficient financial control and procurement processes and adequate procedures for proper grant administration. Any concerns in these areas may be reflected in additional grant conditions that are received.

So in your procurement document, whether it be a request for proposals or request for qualification, you should be specifying the type of contract that you intend to use. This slide provides some suggestions for specific items to be included in both procurement and subsequent contractual documents based on the type of contract vehicle that you select.

If you opt to procure program management support, be aware that the type of contract used can assist you with both cost containment and quality assurance. For example, for rehab and intake services, consider unit pricing for contracts. This form gives grantee control over cost-based on actual volume, allows for great quality control, and provides that you are only paying for the documents that meet your quality requirement. A couple of examples would be a completed intake application with the documentation required that you need to be -- to make your eligibility determination or a completed construction inspection and estimated cost to prepare that allow you to make a determination as to that cost of the scope of services to be constructed.

The reference to 2 CFR 200.459 provides some additional guidance that grantees can consider when deciding whether or not to procure additional assistance with a DR or the MIT program. Most of these considerations are covered in the questions you see on this slide. There must also be a liquidated damage provision in your contract.

Other grantee requirements can be found at 2 CFR part 200 subpart B, which is the post-federal grant award requirement. I strongly recommend if you haven't already done it, downloading that part 200 uniform administrative requirements, cost principles and audit requirements for federal award. It's an excellent reference for ensuring compliance with procurement, contract management, cost principles, and audit requirements. And a download provides an easy keyword search to find the items and the issues that you might need to address.

Appropriate documentation is required from contractors as well as from grantees and subrecipients to allow for reimbursement. This slide shows the documentation requirements for each type of contract. For subrecipients, the subrecipient agreement should clearly spell out the scope of work, the reporting requirements, and the documentation that you're requiring for reimbursement.

For contractors, the type of contract vehicle selected, whether it be fixed price or time and materials, is going to dictate the form that the documentation should take. And, again, there's examples of this on this slide.

As it was mentioned previously, your program should have a program budget that reflects how you believe the costs will break down. Activity delivery includes such things as intake services, environmental review and construction management. The percent of your total program budget that constitutes activity delivery is going to vary. And there's really no right or wrong amount to that. It depends largely on your program design. Your direct program costs are going to be construction and relocation, both voluntary and involuntary.

Your financial system should have the capacity to track activity delivery and direct costs, and also it's very helpful if it is able to track LMI expenditures. It needs to be able to manage the volume of construction draws that you're going to have once your program takes off. And you may also need mechanisms for establishing and tracking escrow accounts if applicants are required to deposit any duplicated benefits prior to construction start.

Unless your program intends to serve only LMI, you'll want to have a system that gives you the updates on a breakdown of LMI versus non-LMI households that you've served. The system should also be able to track where your applicants are within your program, at application, are they getting ready for award, has the environmental review been completed, is the scope developed, and are they in construction.

If you develop naming conventions for documents that will be uploaded to verify eligibility, it'll be much easier for you to be able to identify each required item and also those items not just in the intake process but as you move through your program, so your environmental review reports or Tier Two checklists that Kelly will reference, your scopes and your work in place reports.

To develop policies and procedures for protecting personally identifiable information, otherwise known as PII, for applicants, you will have to collect this as part of your program. These should apply to all staff and contractors and provide very clear training and certification to ensure that there's clear understanding and compliance on anyone that has -- that has access to applicant PII.

Your website is going to play a critical role in providing information on program status to the general public. And also since you need a way to get applicants the ability to determine their status at any point in the process, many grantees have used their online systems to meet this requirement as well.

In developing and implementing your outreach plan, you will want to determine how the populations you've prioritized get their information and tailor your outreach to the delivery channels that they use. Follow your language access plan to make sure that your action plan, amendments and other vital documents defined by HUD as a document to provide information on access to information on or PO procedures from any program are translated into the appropriate languages based on your language access plan.

The next page shows an example of an ISB card that can be used by the program and intake staff for less frequently encountered languages. The use of the language line is a manner in which some grantees provide information access to those applicants whose primary language is not English and where direct in language translation is not readily available.

So you're through the first phase. So here we go on the second phase, determining your intake, eligibility and award. For your application intake, you want to make your process as easy as possible for applicants to access. In this time of COVID to the extent you can, allow applicants to submit application information and documents online or through their smartphones. Create a system that allows documents to be uploaded to a client portal. This keeps both applicants and staff safe. Also, try to locate your intake centers in areas that can be easily accessed by those most impacted by the disaster should in-person visits be necessary.

The list of forms you see here on this slide is typical of those used by homeowner rehab program. Some programs will use additional forms and certifications for households who may not be able to produce documents for some aspect of their eligibility determination, oftentimes because these documents were lost in the storm.

Plan to create a digital file for each applicant. This saves time, space and offers protection to safeguard PII. Make sure that the contractor or staff doing intake know what constitutes an acceptable document. It doesn't need to be current. If it doesn't have to be current, how old can it be? It must be complete, and it must be legible. There is some risk in letting applicants take pictures and send for documentation. What we find oftentimes is the pictures may not be clear or the documents may be incomplete or out of order and are impossible to reassemble for you.

Some contractors have developed safe protocols for collecting, scanning, uploading, and returning documents immediately to applicants with procedures that are specifically designed to minimize face-to-face interaction, keeping both staff and applicants safe from COVID. And if we have questions at the end regarding how those might work, we'll try to address those more specifically and give you a little more detail.

As we discussed previously, your grants management program should allow you to track applicant cohorts from intake to closeout. Developing process milestones allows you to see

where the bottlenecks are occurring and where you may need to adapt or alter a process. Can't stress the importance of ongoing training as your procedures are going to change over time, and you need to make certain that everyone involved with your program understands and integrates those changes.

You're going to develop documentation requirements as part of your intake application process, and these will also be included in your policies and procedures. The slides give you a list of typical applicant requirements and the elements of an eligible property. For example, in some jurisdictions a single family property can be defined as a structure with up to four living units.

Thus, some grantees consider any occupied structure with between one and four units is eligible. Others restrict it solely to single family units. But remember, if you're permitting up to four unit properties to be eligible in your single family program, then you must take into consideration the impact of relocating existing tenants to both your process and your budget.

Here are some examples of how programs opt to document proof of various items of eligibility. For income, I would say the IRS 1040 is probably the most prevalent, although some programs have opted to use Part 5. In terms of ownership, a valid deed is obviously the best, and some of those are obtainable online through your registered deeds or your land records offices. Alternative for proof of ownership, some programs will accept a homeowner insurance declaration page from the date of the storm and currently. Others will accept mortgage statements as proof of ownership.

For documentation that was not a second home or a rental property, these are the types of documentation suggested to be used to verify. For property tax status, this is up to the individual program. Some grantees want taxes to be either current or for the applicant to be on an approved payment plan. Other jurisdictions have made allowances for deferred taxes if that's an option that's available to owners.

Assistance provided and expenditures, this is critical information that should be collected at intake as it forms the basis for later duplication of benefits analysis. You want to collect information on all assistance that was received from FEMA, SBA, NFIP, private insurance and any charities. And to the extent possible, try to make that primary party verification, like your FEMA letter or your SBA loan documents or an insurance adjustor's report because the more detail you get on these, the easier it's going to be to help you with your duplication benefits analysis. The feeds that you will get are really for backup verification only.

Then we recommend providing applicants with a detailed menu of all of the things in which an applicant could conceivably have spent their funds. Don't limit the list just to what the program is going to pay for, but make it as detailed a list of expenditures as possible and allow applicants to provide additional information if funds were spent on something not on your list.

This highly detailed list of repairs could take the place of your program collecting receipts. Although, you should always tell applicants to hang onto those receipts. This report can then be used when a property is inspected by your construction folks to document the repairs that they see on the site and provide cost estimates for those repairs.

At this point, I'm going to turn it back to Kelly to talk a little bit about Tier Two environmental.

Kelly Price: Great. Thanks, Sue. I'll do this really quickly. Just one slide here for me, which is to follow up on the concept we raised earlier when you're in the program design and launch phase to complete your Tier One of your tiered environmental review process. So we want to close that loop with helping folks to understand the Tier Two, which is, again, a unique checklist.

They're not -- one thing I want to say is that a lot of grantees think there's a Tier Two standard checklist out there. There's not. The Tier Two checklist should be created as part of the Tier One process based on your unique geographic location, your program type and environmental conditions. So that Tier Two checklist could have anywhere from 2 items to 10 or 12 depending on which environmental areas were not able to be cleared or completely complied with at the Tier One phase.

So here you'll utilize that checklist. We've seen lots of different models where the Tier Two checklist is completed by damage assessors or construction inspectors to separate environmental experts on staff or on a firm that's been procured or even by, in some cases, intake staff. So it really depends on what works best for your program.

The one thing we would say is that that Tier Two checklist does need to be completed around this stage before you move to any type of construction or rehabilitation or certainly reconstruction. And we recommend that a sampling of those Tier Two checklists is sort of reviewed or monitored, QAQC as we call it, at some point so that they can just -- someone can make sure that those are being done properly, all the checkboxes are there, all the documentation is there and that those Tier Twos make their way into the environmental review record or the ERR.

We highly recommend that Tier Two checklist completion, where that fits in the process and when it's done, be coordinated between intake and the construction sides of the program. Sue and I recently have had experience with a grantee who sort of wasn't sure where along the timeline that that would occur. And it wasn't clear that there was communication occurring amongst the different parties handling those other parts of the program as to when it was completed and when a project was ready to move to the next phase. So communication amongst the different parties that handle intake and construction -- because this is sort of in between the two -- is important.

Here we also want to just mention that sometimes separate and apart from are sort of over and above the Tier Two checklist will be additional requirements for other assessments or inspections related to lead and asbestos. And some communities have chosen to also look at mold levels in units before they move to the construction phase.

So some of those elements can also be documented in the Tier Two, but there are additional requirements based on the condition, the age, and the situation in the community and with that particular unit that may require a lead, asbestos and/or mold inspections reports and treatment to be incorporated in the rehab or reconstruction. Sue, I want to pass it back to you.

Sue Southon: There we go. All right. Thanks, Kelly. These inspections that are done, the damage inspections, have two purposes. The first is to identify and confirm work in place, which I alluded to a little bit earlier, in other words, to take that report that the applicant gives you that says this is how I spent my money, and these are the repairs I did, and this is how much they cost me, to verify that and also to make sure that the cost that were allocated are reasonable. And the second is to determine the unmet need for repairs.

So this information combined with the mitigation measures that Kelly just referenced in the prior slide that you identify in the Tier Two lead and asbestos assessments form the basis for the scope of work that's going to be -- that's going to need to be done.

We referenced in an earlier slide but I want to just mention here that the determination of rehab versus reconstruction is one that you will probably make on the early end of your program design and may modify as you go. But basically programs establish a threshold for unmet needs amount which triggers a conversion from repairing a home to rebuilding a home or reconstructing it.

For example, in some instances, grantees have decided that if the cost to repair exceeds 75 percent of the replacement cost then you reconstruct the home. It varies between programs, and the only caution is that you don't want to make the threshold for transferring from rehab to reconstruction so low that you're doing primarily reconstruction because that's obviously going to limit the number of people that can be served. What we suggest you think about is that the higher of the level of threshold for repair, the more homeowners you're going to be able to serve.

Let's see here. Okay. So the DOB process -- you're going to be using those that information that the inspector brought back to determine what the work in place is and then what the remaining unmet need is. And then as part of the duplication process, you are going to subtract from the assistance received any legitimate things that have already happened. It's work that they've already done or things that don't necessarily apply to your program but are legitimate expenses.

So for example, FEMA does not often give reimbursement for permanent work. Their work is intended to be temporary. And so when your inspector goes out to take a look, what he may find is that there was some work done but it's a patch or it's a temporary board up of a window or something. So you want to make sure that that side gets a credit for that and that that doesn't become something that they have to reimburse the program for [inaudible] count if they have to contribute again.

The other things that they need to think about are funds that are made unavailable to the client for whatever reason. So forced mortgage payoff is the one that we see the most often here. The program award then will become the lesser of your program cap or your unmet need for [inaudible] repairs. The caveat is that if the amount of remaining assistance and the maximum award added together -- in other words, what they've got left that they can contribute that hasn't been an offset to DOB and your award cap are not sufficient to cover the remaining unmet need for repairs, you as the program have to make a determination as to whether to grant an exception to the cap or to tell that applicant that the program can't serve them.

Don't put yourselves in the position where you don't have sufficient resources between the applicant and the program at the onset to complete the repairs and secure a C of O. In those instances, you would be -- you would not be able to demonstrate that you've met a national objective and all the program funds that you've spent on that house would need to be repaid.

Developing step-by-step simplified guidance can help applicants understand the processes of the program and where they are in that process. We also suggest that a simple handout that explains how duplication benefit works and how the program will calculate it is also very helpful.

Create a standardized document for the award, whether you're awarding grants or forgivable loans. Make sure the applicants have a clear understanding of all their responsibilities in the process. If there's a residency requirement that goes along with the award, make sure that they have a clear understanding of that and the consequences of noncompliance.

You also need to execute a subrogation agreement. Most grantees make this part of the closing package when you're doing the award. This is a HUD requirement for all programs and must be executed and should be filed. HUD will expect you to follow through on any recapture that's required. So you need to develop a policy and procedure for recapture and then be prepared to enforce it.

Also, grantees will need to follow a covenant on the property if it's necessary that requires that flood insurance be maintained in perpetuity. This ensures that if an owner sells, the new owner will automatically be made aware of that requirement.

Moving into construction, there are three models that we typically see for contractor selection for homeowner programs. All have their pluses and minuses. And we're going to talk about those in more detail in a minute. But as a reminder, all construction related contracts must contain the precise Section 3 language from the statute. And the program will need to decide how that compliance is going to be monitored, whether you will do it as a program or whether one of your contractors are tasked to do that and you're going to provide oversight.

This chart provides additional detail on how each type of contractor model is implemented. The program managed model is the safest. It's the easiest to use to ensure compliance. But it typically takes the longest to implement. In this instance, the program will execute a contract between itself and the contractor or builder.

The applicant managed model is faster but far more risky in terms of compliance. HUD staff will probably tell you that this is where they see the most compliance concerns with programs that use this model. In this case, the program provides the scope and the award to the applicant who has the contract with the builder for its execution.

The third example is kind of a hybrid mixture of both. The applicant may come to the program with a contractor, but that contractor then has to be vetted by the program and accepted basically. The program then develops and oversees the scope that's carried out by the applicant's contractor. This model uses either a three-party contract or a contract with the applicant that has a requirement that the program must inspect and sign off on all draw requests.

Given our time limitations here and the fact that I want to give you some time for comments and questions, I'm going to -- I'm going to skip this poll and we're going to go on to the remainder of the slides. And this one's a really important one because we mentioned in the earlier procurement all project costs have to be necessary and reasonable. In the most DR and MIT know this is HUD stresses the importance of cost verification and requires that applicants define the process that they are going to use to ensure the construction costs and change orders are reasonable and reflect market pricing.

This is to avoid any collusion among contractors, to prevent a grossing up of costs because it's a government contract and government money, and to ensure that no fraud, waste or abuse occurs during the construction bidding process. That's why in advance of procurement or in advance of having a pool of contractors bid on a homeowner project, there needs to be a third party estimate of the cost of the scope to be bid. Just having contractors submit bids in competition with one another is not sufficient.

Many programs find they don't have enough staff with construction expertise available to manage their program. They typically procure construction management services. As you see in this slide, the list of costs that you see here represent the typical units of services that are reflected in a construction management scope. And as I mentioned in the prior slide, oftentimes these are priced separately so that you have control over how much is being paid based on the volume of services to be provided.

Program staff are then used to oversee the construction managers to ensure compliance with program construction standards, lead and asbestos mitigation requirements, Section 3 compliance and green building requirements. Also, program staff are typically the ones that sign off on draw requests after the construction manager completes a draw inspection and reviews the draw request documentation.

Closeout, we're finally there, guys. Thought you'd never get here, right? An applicant file can be closed out once the applicant receives a certificate of occupancy. A final grant reconciliation is completed to ensure that no additional assistance has been received that could result in an additional duplication of benefits and any other grant conditions have been met.

If you are imposing a residency requirement, for example, a resident's home must remain their primary residence for at least three years post re-occupancy, then you need to have a plan to monitor that. The best way to do that to make sure that any retention agreements along with the subrogation agreements are filed at the time the award is signed. So in other words, you're filing the award document, the subrogation agreement and any -- any retention agreements, as well as your covenant, of course. This allows the retention agreement to become what we call a cloud on the title.

Should the sale occur when a title company is involved, that requirement would trigger a notification to you as grantee that that property is about to be sold. In some instances, we know of grantees that have decided to release the applicant from that agreement, usually in cases of hardship. This is not a program requirement, but it is considered a best practice, and it's often

used when grantees want to make sure that the applicant does not immediately go out and sell the improved property.

I'm going to pass this back to Kelly now for our Q&A.

Kelly Price: All right. Thank you, Sue. We have one question in the [inaudible], which is kind of unusual. But that's some indication of the number of grantees that are maybe new to this or -- or just kind of absorbing all this information to plan to ramp up.

The one question that we got in case it's helpful to other folks would be -- when we talked earlier about [inaudible] or delivery class and there's other webinars that have provided more detailed information on that before, but when we talked about that, there was a question as to whether or not the internal audit function if required for CDBG-DR would fit under program delivery or admin cost. And the answer to that is internal audit is a program-wide function that is looking for fraud, waste, and abuse and corrective actions to address this. So that would be an administrative cost on that.

Sue, I wonder if -- we just have a couple minutes left. Is there any other parting thoughts or advice you would provide to our audience?

Sue Southon: I got to get you back. I don't see you.

Kelly Price: We can hear you, Sue.

Sue Southon: Okay. Good because I can't see you. But I think the one thing I would probably say is that while this is a really complex program and we ran through a ton of information in a relatively short amount of time, we have found in working with grantees that the field office representatives are a wonderful source of support and encouragement and the place to go to get questions answered.

And I think one of the things we would certainly encourage particularly the new grantees to do is to -- is to get to know your field office people. And in addition to that, most of the field offices will have at their disposal subject -- HUD subject matter experts in some of the more intricate requirements, if you will, of a homeowner program, things like uniform relocation, which is critical and is going to come into play -- could come into play with your single family and will definitely come into play if you're doing any kind of rental programming.

Environmental review would be another one where it -- consultation and support and assistance from your HUD staff people can be really, really valuable. So I would encourage you. There are tools on the website, which are great. And there will be more coming. But your HUD field office staff and your regional office staff are tremendous resources. Get to know those people. They're phenomenal. They're great to work with. And they want you to be successful. So that's their commitment to you, and I would encourage you to reach out to them and to use them as a resource.

Kelly Price: Yeah. Great point, Sue. And we have up here for those still with us just some key resources. There's obviously a lot more here. HUD Exchange is going to be your primary resource. And there is a toolkit specific to launch, and there's a segment of that toolkit that's specific to Homeowner Rehabilitation Program. So it will give you a lot of the things that we talked about in more detail and some actual tools, a spreadsheet, a checklist, those sorts of things that you can actually use as you plan out your programs.

And I wanted to make sure folks are aware, if you're on the HUD listserv, you should be getting these messages, but just in case we have folks who are not, please do sign up for the HUD listserv. Just go to the HUD Exchange and you can select the different topics that you want to receive information about. But these are the additional webinars that we'll be having over the course of the next six weeks or so.

The next one up is a rental housing webinar next week. That's a new topic for a lot of folks and one we're seeing increasing use of. So that will be focused on multi-family housing and how to combine CDBG-DR with other sources of funds including like low-income housing tax credit. And then a series of additional topics as well. So we hope you can join us for those. If you have any problems or need more information, utilize the HUD Exchange to send in that request to us.

Our HUD folks, any other closing remarks, anything else? Nope. Just thanks, everyone, for listening, and we hope you tune into the rest of the series.

Sue Southon: Sounds good. Thank you, everyone, for joining us, and good luck with your programs. And we look forward to seeing you on the other webinars. Thank you.

(END)