



Continuum of Care 2.0

Grant Administration Stages of Continuum of Care Program Grant



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Welcome to the HUD Broadcast Grant Administration: Stages of the Continuum of Care Program Grant. In this presentation, we will review the grant administration requirements under the new Continuum of Care Program.

While this broadcast provides a brief introduction on this topic, as always, we encourage you to seek complete information on the CoC Program regulation at 24 CFR 578.

Today's Broadcast will cover...

- Different Stages of CoC Program Grant
- Key Roles
- Review of Each Stage of Grant Administration



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When you receive a CoC Program grant award, you are required to follow the CoC Program regulations and grant requirements. This broadcast focuses on the stages of a CoC Program grant, we will walk through the stages to help you understand what to expect at each stage. We'll start with an overview of the stages of a grant and the key roles associated with grant application and administration, and then we will discuss each stage individually.

Different Stages of CoC Program Grant

Overview

- Project application
- Conditional grant award
- Grant execution
- Project operation
- Grant renewal (optional)



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A project has several stages with different requirements associated with each stage. The phases of this timeline will be laid out in more detail throughout this presentation, but I'd like to provide a broad overview to frame the broadcast.

- The cycle actually starts when the application is submitted to HUD.
- The next stage is the conditional award, after which the recipient must satisfy any conditions imposed with the award.
- When all conditions are resolved, HUD will execute a grant agreement with the recipient.
- The recipient must start the operation of the project within specified timeliness standards
- And must operate the project in compliance with the CoC Program regulations
- Ultimately, the recipient may be selected by the CoC to renew project funding.

Key Roles:

Applicants and Recipients

- Applicant - designated by the CoC to apply for funds and carry out projects
- Recipient - Grantee
 - Signs grant agreement with HUD
- Subrecipient - Project Sponsor
 - Receives a subgrant from the recipient to operate a project



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The CoC Program grant administration requirements use several key terms.

- An **Applicant** is an entity that applies for CoC Program funds from HUD.
- A **Recipient** is the entity that receives the grant award and executes the grant agreement with HUD. A recipient may choose to subgrant part of all of the CoC Program grant to one or more subrecipients to operate the project, or the recipient may operate the project directly.
- A **Subrecipient** is an entity that receives a subgrant from the recipient to carry out the operation of the project.

Before the CoC Program interim rule, the term “grantee” and “sponsor” were used. The grantee was the organization that signs the grant agreement with HUD and maintains the contractual relationship. The grantee is now called the recipient. The Sponsor was the entity that provides the housing or services required in the grant agreement. The Sponsor is now known as the recipient or a subrecipient.

These terms have changed to be consistent with the Emergency Solutions Grants program regulation and also to ensure that the relationship between the recipient and subrecipient is clear.

Eligible Recipients

- Recipient: signs grant agreement with HUD
- Eligible recipients and subrecipients: private nonprofit organizations, States, local governments, public housing agencies, or instrumentalities of State and local government
- Subrecipients



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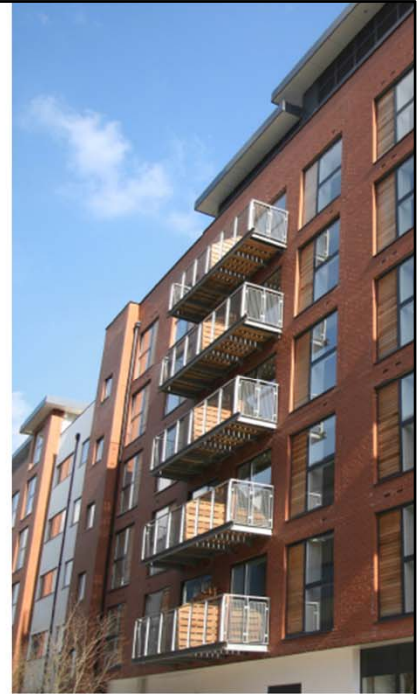
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While an Applicant is defined as an entity that applies for CoC funds from HUD. This training will use the term Recipient, to signify the entity that receives the grant award and executes the grant agreement with HUD.

Eligible recipients and subrecipients include private nonprofit organizations, States, local governments, public housing authorities, or instrumentalities of State and local government. Recipients must be eligible in order to apply. Since subrecipients may not be identified until after the award, the recipient will need to verify their eligibility before subcontracting.

Project Application

- Project starts with project application and is important for two reasons:
 - Funding decision is based on the application, and
 - Application becomes part of grant agreement with HUD.
- If successful, HUD makes conditional grant award



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The first stage of a CoC Program grant actually begins with the project's application to HUD for funding. The application is important for two reasons—

- The funding decision is based on the application, and
- The application will become part of the grant agreement with HUD.

The application specifies the recipient, the numbers and populations to be served, the program component and number and size of units the recipient is committing to provide, the requested budget line items and amounts, and the match and leverage commitments. Changing these later will require a grant amendment.

If you receive notice that you have been conditionally awarded your grant – congratulations! Keep in mind it's a conditional award, meaning that certain conditions must be met before the grant is executed and before you can spend the funds.

Conditional Grant Award

- Recipient must satisfy the following conditions before funds will be fully obligated
 - establish site control
 - provide proof of match
 - comply with environmental review
 - document financial feasibility within deadlines



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A recipient of a conditionally awarded grant must satisfy all requirements otherwise, HUD can withdraw its offer of the award.

These conditions must be satisfied within 12 months of the announcement of the CoC Program grant award. or 24 months in the case of applicants that receive funds for acquisition, rehabilitation, or new construction. HUD may extend the 12-month deadline if the applicant can show compelling reasons for delay due to factors beyond its control.

Once all conditions are satisfied, you can enter into a grant agreement with HUD.

Grant Execution

By executing the grant agreement, recipient agrees to:

- Operate project in accordance with the CoC Program interim rule
- Monitor and report project progress to CoC and HUD
- Monitor and report on grant and match expenditures
- Follow the coordinated assessment system policies and written standards adopted by your CoC.
- Ensure that any subrecipients understand and comply with applicable CoC Program requirements
- Comply with any other Notice of Funding Availability (NOFA) terms or conditions



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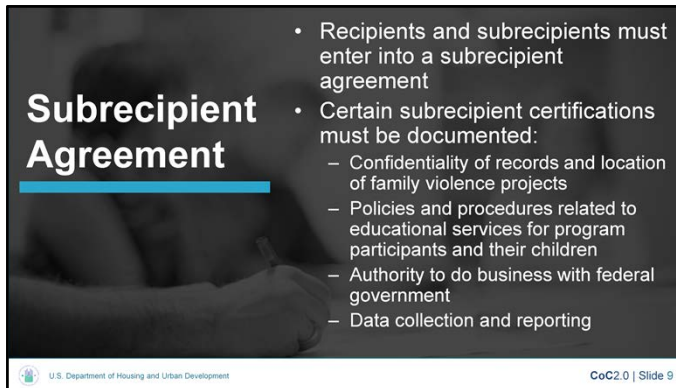
The next stage of a grant begins with executing the grant agreement. The grant agreement outlines the roles and responsibilities for both the recipient and any subrecipients.

The grant agreement must be executed no later than 45 days from the date when all conditions are satisfied. If the grant agreement isn't executed then technically the award can be withdrawn for failing to meet program requirements.

By signing the grant agreement, the recipient agrees to:

1. Ensure the project is operated in accordance with the McKinney-Vento Act and CoC Program interim rule – from eligible activities to involvement of people who are homeless in project operation to recordkeeping.
2. Monitor and report the progress of the projects to the Continuum of Care and to HUD.
3. Monitor grant and match expenditures and report matching funds to HUD.
4. Follow the coordinated assessment system policies and written standards adopted by your CoC.
5. Ensure that subrecipients understand and comply with CoC Program requirements and enter into subrecipient agreements and monitoring them accordingly.
6. Comply with any other terms or conditions established by NOFA.

REMEMBER, there are significant financial recordkeeping responsibilities associated with grant administration and project operation that require standard accounting practices. There are also financial responsibilities associated with being a 501c3 and with being a HUD recipient or subrecipient.



Subrecipient Agreement

- Recipients and subrecipients must enter into a subrecipient agreement
- Certain subrecipient certifications must be documented:
 - Confidentiality of records and location of family violence projects
 - Policies and procedures related to educational services for program participants and their children
 - Authority to do business with federal government
 - Data collection and reporting

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As noted in the previous slide, recipients sign a grant agreement with HUD. Subrecipients, on the other hand, do not have a direct contract with HUD, but instead receive CoC Program funds through the recipient. The recipient must enter into an agreement to ensure that the subrecipient certifies it will follow all requirements associated with the CoC Program funding. Although the recipient may just include a blanket requirement in the agreement, we encourage recipients to detail the requirements and any specific recordkeeping expectations as part of the agreement. By clarifying all requirements and expectations, all parties will be clear on what is needed to administer CoC Program funds.

Contract documentation must include some specific certifications from subrecipients including the following:

1. SUBRECIPIENTS will maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project.
2. THE ADDRESS or location of any family violence project assisted will not be made public, except with written authorization of the person responsible for the operation of such project.
3. SUBRECIPIENTS will establish policies and practices that are consistent with, and do not restrict, the exercise of rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness.
4. IN THE CASE of projects that provide housing or services to families, subrecipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act.
5. THE SUBRECIPIENT, its officers, and employees are not debarred or suspended from doing business with the Federal Government. AND
6. SUBRECIPIENTS will provide information, such as data and reports, as required by HUD.

Project Operation

Recipients must promptly initiate approved CoC Program-funded projects.

- Begin non-construction projects within 12 months
- Begin construction activities within 9 months and complete them within 24 months

Activities that cannot begin until after construction is completed must begin within 3 months of the date that construction activities are finished.



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Once your grant is executed, the project can begin. **Recipients must *promptly* initiate approved CoC program activities and projects.** HUD has established specific timeliness standards for each type of CoC Program activity.

The timeliness standards for rehabilitation and new construction activities are:

- Recipients or subrecipients must begin construction activities within 9 months of signing the grant agreement. Construction activities must be completed within 24 months of signing the grant agreement.
- Activities that cannot begin until after construction is completed must begin within 3 months of the date that construction activities are finished.

If the recipient does not comply, HUD may require the CoC Program funds to be returned, or be deobligated.

Operating Start Date

- Defined as the date when the project started to serve persons who are homeless
 - New projects without acquisition or construction start the 1st day of month that the recipient incurs eligible costs
 - New projects with acquisition or construction start the 1st day of month following completion of acquisition or construction
 - Renewal grants start the day after the end of previous grant term.



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The Operating Start Date indicates when the term of the grant begins, that is, when the project started to serve persons who are homeless.

For new projects without acquisition/construction/rehab costs, the operating start date is the first day of the month in which the recipient or subrecipient begins incurring eligible operating, supportive service, leasing or rental assistance costs – when the first participant is accepted into the program.

For NEW projects with acquisition/rehab/construction costs, the operating start date is the earlier of the two.

- 1- The first day of the month after receiving the Certification of Occupancy following the completion of the activities OR
- 2- the date the Notice of Funding Availability established as the deadline to begin operating the project.

For the RENEWAL grants, the operating start date and the grant term begin the day after the end of the previous grant term. The Operating Start Date is important – it gives you the beginning and end of the grant funding term, and it is the reference point for all other deadlines.

Grant Renewal

- If prioritized locally, project funding may be renewed to continue assisting persons who are homeless
- NOFA contains priorities and guidance for projects applying for funds that year
- All existing Supportive Housing Projects, Shelter Plus Care and SRO projects are renewed under CoC Program



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CoC Program funding may be renewed to continue ongoing leasing, operations, supportive services, rental assistance, HMIS, and administrative activities beyond the initial funding period, contingent upon the availability of federal funding and conditions specified within the annual Notice of Funding Availability. Renewal funding provides one-year increments of funding for the period beginning the day after the end of the previous grant term.

Recipients must submit applications to seek renewal funding through the annual CoC Program funding competition, and must be selected and prioritized through the local CoC application ranking process in order to be considered for funding by HUD. Each year the NOFA will contain priorities, limitations, and guidance about renewal projects.

For projects previously funded with SHP, S+C and SRO Program funding, any additional renewal funding will occur through the CoC Program.



How to ask questions to HUD

You can obtain additional information or assistance by going to [OneCPD Resource Exchange](#) and searching the [Resource Library](#), checking out [Training & Events and News](#), using [Ask a Question](#) or [requesting technical assistance](#)



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Thank you for attending today's broadcast on grant administration and the stages of the Continuum of Care Program Grant. This broadcast provided information on the stages of a CoC Program grant and the key roles associated with the grant application and administration. Please refer to the related grant administration training materials that are provided on the OneCPD Resource Exchange. In the event that you have a specific question, please contact your Field Office or submit a question to the Ask-a-question section of www.oneCPD.info.

As a reminder, this broadcast provided a brief introduction on this topic, as always, we encourage you to seek complete information on the CoC Program regulation at 24 CFR 578. Thank you.



Thank you.

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