Speaker 0 00:00:00 Welcome and thank you for joining today's conference, special nofo startup session, getting to grant agreement. Before we get begin, please ensure you have opened the WebEx chat panel boosting the associated icon on the bottom right corner of your screen. Please note that all audio connections are muted at this time. You are, however, welcome to submit written questions throughout the presentation and these will be addressed during q and a. To submit your questions in writing, select all panelists from the drawdown menu in the chat panel and to your question in the message box provided and send. As a reminder, this conference is being recorded. If you require technical assistance, please send a chat to and teller events. With that, I'll turn the conference hour to Marlisa Grogan from HUD's Office of Special Needs Assistance programs. Please go ahead.

Speaker 1 00:00:48 Thank you and welcome everyone. It's great to be here with you today for our first special nofo startup session. Today we're going to be covering getting to grant agreement. Next slide, please. Before we get to the agenda today, I'm just going to go over a few logistical items. As Teagan mentioned, the startup sessions are going to be recorded and we will make sure to share those with you all, and we highly encourage you using the chat to ask questions throughout the session. We're going to be monitoring the chat and trying to answer as many questions as we can. If there are any questions that we can't answer, we'll be sure to follow up with you all and there will be a q and A session at the end of our time today. I also want to flag for you all that we will be getting a FEMA alert, emergency alert. It's a test that you may have all heard is going to happen, so either on your computer or your phone at around two 20 Eastern time. Don't be alarmed, it's just a test. It has, uh, nothing to do with our webinar, but we're just calling it out to make sure that you're all aware and it doesn't throw us all off track. It's to be expected, and we're just going to continue on with our presentation as planned. Next slide please.

Speaker 1 00:02:14 So today we are going to start with a welcome from our Deputy Assistant Secretary Jamine Brian, and we'll do a quick overview of the startup sessions. We're going to be reviewing issues and conditions and how to satisfy them. We'll also cover grant changes, timeliness standards, where to find answers, and the role of the CoCs in special NOFO projects. Um, I also wanted to let you know that we have a partnership of both, um, staff from the Office of Special Needs Assistance Programs, as well as the field. We have Carrie Fortune from the Detroit Field Office, Taylor Keeley from the Chicago Field Office. We're going to be presenting along with Ebony Rankin and Brett ERs from the Office of Special Needs Assistance Programs, along with other staff, um, and in the background who are going to be working on answering your chat questions. So we're really excited to present this material to you all. And with that next slide, I'm going to turn it over to our Deputy Assistant Secretary Jamine Bryan Jamine.

Speaker 2 00:03:24 Thank you, Marlisa. Good afternoon, everyone. Let me start one more time by congratulating all of our COCs and project recipients of these rule and unsheltered grant awards. We are very excited by the opportunity to have allocated these funds for this very, very important, um, issue in our nation today of unsheltered homelessness and homelessness in rural communities. I want to say good afternoon to you all as well. Those from the HUD Field office, um, R t a providers and, uh, snap's, uh, staff who are also able to join us today. As I'm sure many of you already know, this package of grants is part of a first of its kind funding initiative to address homelessness among people in unsheltered settings and in rural communities. The initiative, which also includes 3,300 housing stability vouchers

allocated by the Office of Public and Indian Housing to PHAs, um, we all are working towards responding to the rising problem of unsheltered homelessness and homeless encampments, including in rural communities.

Speaker 2 00:04:42 I want to emphasize these grants have a specific purpose of targeting efforts to reduce unsheltered homelessness and housing people is the primary objective with this package of funding. The intent behind these grants is not, you know, business as usual, but rather to work together as a community, including mainstream health and housing programs in a coordinated and strategic manner to reduce unsheltered homelessness. As you saw from the contents of the nofo, the way it was rolled out, the announcement of the awards, the expectation with these particular and precious funds is really to show results in this very specific area. You need to stay true to your COCs plan to reduce unsheltered homelessness and serve people experiencing homelessness with severe service needs. While HUD funded individual projects, HUD expects continued coordination between recipients of projects and the C O C to ensure the community is consistent with these efforts.

Speaker 2 00:05:58 We suggest COCs have a core team focused on reducing unsheltered homelessness and implementing these projects in consultation with people with lived experience and expertise, as well as those who reflect the people being served. You must adopt housing first approaches, which prioritize rapid placement and stabilization in permanent housing without service participation requirements or preconditions to effectively implement a housing first approach, your c o c needs to ensure that you have an inventory of housing available for permanent housing, along with ample supportive services to help households obtain and maintain that housing. The Special Nofo Awards included significant funding for supportive services to help with these efforts. But let me be very clear. These supportive services are expected to connect people experiencing homelessness to housing, and to help people maintain that housing, you should continually re-review the policy priorities detailed in the special nofo and ensure that they guide the implementation of these projects and your Co C'S plan.

Speaker 2 00:07:21 In addition to what we have already discussed, they include reducing unsheltered homelessness, increasing equity, involving a broad array of stakeholders and involving individuals with lived experience of homelessness in system level decisions and in project design and implementation. We know that as c Cs and recipients, you have different levels of familiarity with the CoC program. Some of you have years of experience for others. This will be your first CoC grant. Many are coming to this space after responding to the COVID 19 pandemic. After completing your annual CoC NOFO applications, and at the same time responding to natural disasters and local stresses of various magnitude, I want to acknowledge that while also assuring you that your TA providers, field office partners and SNAP staff are here to help and support in any way we can to set you and your communities up for success.

Speaker 2 00:08:30 These sessions are packed with information and today will be no exception. SNAPS and field office staff develop the content and will present all material, which focuses on what you need to get to grant agreement and start your special NOFO projects. Remember that we will provide a recording of each session in the series, as well as the slides for you to re-review as many times as needed over the course of implementing your projects. HUD staff and your TA coaches are also available to provide additional assistance in any area that you are struggling with. Please ask us questions and brainstorm solutions with us early and often so that these projects can meet c o C program requirements and your goals while also ex uh, assisting those who are experiencing homelessness in your communities. And if there are any other ideas on how we can work together to, to guide this process, to exchange information on what works and what doesn't work, please, please let us know before turning it over to today's presenters.

Speaker 2 00:09:41 I want to thank you for the important work you all are doing. You have an exciting and challenging opportunity to reduce the number of individuals and families experiencing unsheltered homelessness and those who are homeless, living in rural areas. HUD is a committed partner in this work. We look forward to collaborating with you and learning from you along the way and being there in whatever way you need us. So again, I want to thank you so much for today for the work you do to address, um, those in need in this country, but also for the work you're about to do under this particular program. With that, I will turn it over to you, Marlisa. Thank you everyone. Thank

Speaker 1 00:10:29 You so much DSS, Bryan, and, uh, we can go to the next slide. Alright, before I get to the overview of the startup sessions, I just wanted to alert everyone to the different two selection options you have in the chat. So when you are submitting your question, please select everyone and that will ensure that everyone in the chat can both see the question and then when we respond back, we will respond to everyone. So you can, you can see both the question and the answer. If you only select panelists, then only the panelists get to see your question. So please make sure that the two line is selected to everyone. Alright, so we are going to be doing this, uh, these startup sessions every Wednesday from two to 4:00 PM beginning today. And we expect that they're going to be ending on November 1st. We may hold an additional session if needed, if there are outstanding topics that you'd like us to cover, or if there are any areas of confusion that we, we just need to focus more time on.

Speaker 1 00:11:45 But otherwise, we expect that the sessions will end, um, on November 1st. So we're going to start each startup clinic with some time in the beginning to do some q and a. If you have any questions about the content from the last session, please bring them to the next session because we will dedicate some time in the beginning to go over those. And our overarching goal here is to be able to provide you with the foundational knowledge about how to execute, administer and close your grants so that sort of the scope of the content and just keep that in mind with, um, you know, the questions that you're asking and any additional areas that you feel fuzzy on and that you're interested in, um, training on. So with that, I'm going to turn it over to our next panelist. Next slide, please. Who is Carrie Fortune from the uh, Detroit Field office? Carrie,

Speaker 3 00:12:46 Hello. We're going to be talking about satisfying conditions today. Next slide please. These are conditions that you may have placed on your grant that need to be satisfied prior to grant agreement. And so today we'll be talking about site control, um, documentation to provide or to show that the project is financially feasible completion of environmental reviews, firm commitments of match. But you may also need to provide your organization's code of conduct. If you didn't do that during the application or while your re uh, your application was being reviewed, the reviewers may have come up with some questions that they need answered, and so they'll be sending you those. Most of this, if not all of it, will be done in esap. So you'll get those requests in writing, and you'll have 30 days from our written request to go ahead and provide the information to us. However, on hard costs you'll have up to two years to complete, uh, some of the conditions on acquisition, new construction or rehab, and then you have to be moved to grant agreement. So you have to have the conditions met and moved to grant agreement within 12 months of the announcement of the award. Next slide.

Speaker 3 00:14:00 Site control is one of the conditions that you have up to two years to, uh, go ahead and complete. Site control is required when there's acquisition, rehab, or new construction that's in your, um, grant or funds that are awarded to you in your grant. Acceptable evidence of this is a deeded, a lease or a purchase agreement, because state laws vary state to state. You may have some other type of evidence and you'll need to check with your HUD rep to make sure that's acceptable. However, on the deeds, the leases and the purchase agreements, we do accept those as evidence of site control as long as the owner or lease or the purchaser that's on these documents are the applicant or your sub-recipient. So you can't have, say, a deeded with a third party as the owner and use that as site control. Next slide please.

Speaker 3 00:14:56 When HUD looks at financial feasibility, we look at kind of the whole picture. So we're looking to see if, um, the project is viable. We may, you know, we're looking at the money that you applied for, and then we're also looking at the match, but we may look at other things such as if you are asking for operating funds, do you own the building? If you don't own the building and you're not asking for leasing funds, then where are those leasing funds coming from? We want to make sure that, you know, you've got the housing in place and there's our reminder. So we'll pause here for a minute.

Speaker 3 00:15:39 All right, I think our alert's over, so, as I was saying, we are looking to make sure that the whole project is viable. Uh, another instance may be if you applied for rental assistance but you did not apply for supportive services. We may be asking some questions as to where supportive services will be coming from, how clients will be getting case management or things like that. So we're looking, um, kind of at the whole thing, make sure it's viable. And there are a variety of documents that we may ask for, um, financial records or previous audits that would show that your financial standing might be requested. Explanation of activities listed in budget line items of your application. This one is something we see quite often in the field offices, um, and a lot of the time it comes under supportive services. We may have grantees that write case management as you know, what they're requesting funds for.

Speaker 3 00:16:32 What we need to see is how many case managers or how many full-time equivalents, what are they being paid? You want to make sure that you are very descriptive in the budget line items and what you're asking for, especially in supportive services. Or we may be sending that back to you in SAPs just asking for additional information. Um, disbarment searches search results from sam.gov in the Detroit field office. We ask for this at the time that you submit your executed grant agreement to us, but other field offices may ask for it prior to going to grant agreement. And then letters committing leverage and match commitment letters. Match commitment letters are often asked for, imagine leverage are often confused. So I want to, um, take a couple of minutes to talk about the differences. Taylor's going to talk about match in a couple of minutes, but I thought I would touch on leverage.

Speaker 3 00:17:22 So leverage is non match resources that are committed to making a CoC project fully operational. I say resources because they could be cash or they could be in kind leverage. Funds are used for any program related costs, even if the costs aren't budgeted or if it's not an eligible cost under the CoC program, it can still be leveraged. Uh, they may be used to support any activity within the project that's provided by the, the recipient or the sub-recipient. And most common what we see for leverage, um, is mainstream resources such as say, state funded childcare or state funded healthcare. But there's a variety of other types of leverage that are used. Again, it's anything that helps clients be successful in the program. So an example of an unbudgeted leverage might be legal aid services. When

you applied for the funds, you didn't think that, um, either that would be a, a great use of the limited finance or funding, or you may have thought that it wouldn't be needed and so you didn't apply for legal aid services.

Speaker 3 00:18:26 But during the course of the grant, you may have a couple of clients that need it. Uh, it's not going to be matched because again, it wasn't really planned for and you didn't get an M O U with the legal service provider. But that can be leveraged. It's important, you know, services to some of the clients. And so if you use legal aid services, make sure that you're notice noting that and counting that as leverage. Uh, an example of leverage that's an ineligible cost could be like a bucket of cleaning supplies that your agency provides when clients move in. Again, it's not food, you know, it's not something that's eligible that you're giving clients when they move in, but it is something that is needed, something that helps the clients become, uh, self-sufficient, that helps them be successful in their housing. And so it's something that you could use as leverage. These are just a few examples, but there are plenty of examples of what goes into client success and project success at your level. So make sure you're keeping an eye out for those and, and making notes of those as you go on through your program. Next slide, please.

Speaker 3 00:19:29 I'm going to hand it over to Taylor now.

Speaker 5 00:19:33 Hey everybody. I'm going to provide a brief who, what, when and where to ensuring you have the accurate level environmental review record or ERR and the related written policies and procedures in place before expending any of your CoC or snowfall funds. Um, who completes the environmental review record depends on the local jurisdiction where the activity's taking place. So with the environmental regulations at 24 C F R 58, say, they call it the responsible entity, and that's a local jurisdiction where the building or activity is taking place. If you're working with a local jurisdiction, they refuse to certify, they're, you just can't get in contact with them, please reach out to your local HUD rep, uh, to troubleshoot. They'll either be able to get you in contact with the environmental office, uh, within that local jurisdiction, or they can communicate with their HUD environmental office to troubleshoot a solution.

Speaker 5 00:20:25 Um, what level of environmental review you need to do depends on the type of activity that you're implementing. On the next slide I'll go through on, uh, the different levels. But when does this need to be completed? Uh, the applicable level of environmental review record should be completed prior to funds being spent on the, uh, applicable activities. So that's why we're talking about it right now. And getting to grant agreement session one, uh, we really want to ensure that these environmental review records are in your program files with related policies and procedures written and in place. Um, these environmental review records are going to be completed on paper for the CoC program, including SFA. The paper forms for each applicable level of review are found on HUD Exchange, but I've also embedded a few within the next slide. Let's go ahead and jump to the next slide.

Speaker 5 00:21:14 So, as I mentioned, the levels of environmental review record are dependent on the type of activity or project that you're implementing. So as, um, as the grantee, you are responsible for demonstrating that you understand which level of review is to be completed for your project type. To demonstrate this, you must have those policies and procedures written to get you to the appropriate level of review during a HUD monitoring. We just want to always show our work. Uh, these levels go from least stringent, uh, least amount of work for a grantee at the top to the most stringent, uh, the most amount of work at the bottom. Um, the least stringent level of environmental review record is

going to be what the environmental, um, regs call exempt. This level of review would include any activities or projects that have soft costs, like supportive services only, or operating an admin, uh, that's excluding rental assistance and leasing for those projects.

Speaker 5 00:22:08 The program file should include what we call the Nationwide Environmental Review, and that's completed by HUD headquarters every year. And if you need a copy, please reach out to your HUD field rep. If you're a field office and not familiar with this, reach out to your environmental officer and they can get you a copy to send. The next most stringent level of environmental review is CE NST, and that stands for categorically excluded, not subject to, uh, it's basically converts to what we talked about before in the exempt uh, category. This level of review is completed for tenant-based rental assistance and tenant-based leasing, where the client has a choice in the location of the unit, uh, as evidenced by policies and procedures, um, where maybe you offer three units in your scatter site program and the location of the client's choice. Um, for this type of project, the grantee will use what we call a statewide environmental review that's actually completed by the local HUD field office in my HUD field office in Chicago.

Speaker 5 00:23:08 We generally try to provide this at, um, the grant agreement execution email chain, but if you haven't received a copy from your field office, please reach out to your own field office contact. They'll be able to get in contact with the appropriate folks to ensure that you receive that for your program files. If you're field office and not familiar with this or haven't done that yet, um, reach out to your assigned environmental officer. They can walk you through preparing it and getting it out to grantees. It's a pretty quick process. Uh, this CENST or the statewide review is also completed annually on behalf of grantees and sent out. The next level of review is called CEST, and that's categorically excluded subject to, so it's not going to convert to exempt. We've got a little bit more, uh, lack of choice involved, and that's going to be for tenant-based rental assistance and tenant-based leasing, where the client does not have a choice in the location of their unit.

Speaker 5 00:24:00 This is standard project based or master lease unit programs where the client doesn't have a choice in location of the unit. Uh, for this type of project, the grantees to complete what they call a limited scope environmental review record, and that's linked to here in the slides as well as on HUD exchange. Um, and they, the grantee completes this form, uh, and signs as the preparer and sends to their local jurisdiction to sign as a certifier. However, some local jurisdictions may prefer to do both preparing and certifying and then just send you back a copy for your own records. That's great if your jurisdiction likes to do that, it's less work for you. But it all depends on the environmental staff of that jurisdiction. And again, if you have any trouble contacting your local jurisdiction where your CoC project is located or they're refusing to work with you on the environmental review, please reach out to your HUD reps so they can consult the HUD Environmental Office to troubleshoot it.

Speaker 5 00:24:54 Uh, these CEST or limited scope reviews are required to be completed once every five years, and if the project, uh, changes scope or, uh, the building environment changes, uh, so it's really key with the different timeframes of each of these to make sure that you have policies and procedures and checks and balances in place to make sure that you're not losing track of any of that. Uh, the most stringent level of review is going to be what, uh, is called our environmental assessment. And this is completed, uh, when we have hard costs. So, acquisition, rehab, construction, uh, you're going to be completing the applicable level of review record on paper, just similar to what I talked about for CEST and the Ness scope, um, and the, the, the link to that form for the environmental assessment is here, but

also on HUD Exchange and in their handy dandy flowchart. Um, and work with your local jurisdiction to get that certified and back into your program files for, um, further monitoring. As I've said throughout, if you have any questions about any of this, reach out to your HUD field rep. Uh, if they don't know the answer, they can reach out to the assigned HUD environmental team to get additional information and or training for you. Uh, next slide.

Speaker 5 00:26:08 All right, I'm going to move us right along into another requirement that's necessary for documenting in order to get to grant agreement, uh, but also throughout the grant term, uh, match. Uh, this is going to be a very high level review, but some just important things to remember. Um, the basis is the match requirement for CoC and thus the NOFO grants is that recipients must match all funds except for leasing with 25% cash or in-kind resources and program income can also be used. A grantees may require sub-recipients to contribute to that match requirement that's on them. Um, but they may, they, they should make sure that any type of match contribution they're requiring of their sub-recipients is included in the sub-recipient agreement. Uh, there is no requirement that the matching funds be used on an activity that's been, uh, already approved in the project budget.

Speaker 5 00:26:57 However, it has to be used on eligible CoC program costs in accordance with the C O C program requirements. And so, as with all C O C program costs, the matching funds must be reasonable, applicable, and allowable. There are four points during the grants lifecycle in which match is verified or tracked. Um, and thus four points in which you as a grantee should be prepared with documentation of match. You may recall last fall at the grant application in EAPs, grantees were asked to upload commitment documentation to EAPs applications. Uh, now we're at grant agreement almost exactly, or just about a year out, um, a year later. And, um, so now as the grantee, you'll be asked to upload updated commitment documentation. We understand things change, but we need that updated commitment documentation that reflects what's actually going to be, uh, committed to the project via that C one nine step in EAPs.

Speaker 5 00:27:54 As you're communicating back and forth with the HUD Field office, um, the most important part of all of match and kind of the thing that we see the most that's being missed is throughout the grant period, the grantee must be tracking and documenting the match is actually applied via whatever process you, uh, deem necessary to be able to document that. This is verified during monitoring. So you have to not only track the commitment upfront, but also track on the backend that it's being applied to the appropriate project, that it's eligible and so on. Um, so coming up with a process to track this on a regular basis and having policies and procedures, whether it's, uh, doing it monthly, every time you draw quarterly, whatever it may be. Um, we do know our accounting and financial systems are not necessarily set up for nonprofit work. Um, so matching is often difficult, but, um, check in with your peers and resources online, um, to help you build that policy and procedure. And then finally, the last point throughout the grant term is going to be at the annual performance report or a p r in Sage. Grantees will be asked to re report, uh, financial information along with their match in the system. The types of match we're going to talk about today are cash volunteers and in-kind contributions. Next slide.

Speaker 5 00:29:16 Alright, we're going to start with the easiest. Documenting cash match is fairly straightforward. Um, you're going to want a letter from the organization or individual donating the cash match demonstrates the amount that will be provided, the dates that it'll be available to the project, which obviously must overlap with the period of performance for the grant. And then the activities that

the cash can be used for those. Some donations are specific to only using for bus tickets, um, whereas others are for anything that's eligible in the CoC program, then it needs to be enough detail to be able to suss that out. Uh, if the grantee will be contributing its own general funds to the project and upfront, they'll want a letter indicating that their own funds will be contributed to the project, uh, enough information to determine that the source is not statutorily prohibited from being used as match should be included.

Speaker 5 00:30:04 So, um, there's just a few, maybe a couple that I've ever seen in my work in this world where it is actually statutorily prohibited from being used as CoC match. But we do have to check that during monitoring. So you need enough information about your source in the commitment letters and in the tracking to determine if it was, uh, statutorily prohibited. And during the grant term, when cash contributions are, are used as matched recipient want to record that, um, as, uh, the use of funds on their books just as though you were documenting, uh, expenditure of grant funds. Next slide.

Speaker 5 00:30:41 And I know the SNAPS office often receives questions about how to document the time of grantees own volunteers. So we're going to talk a little bit about that. Um, volunteers of, uh, the grantee's own organization are sort of akin to the grantee's own staff time being contributed to the grant, which is a form of cash match because the organization is paying those salaries. In the case of volunteers, the grantees will want to document, uh, a volunteer's time through sign-in sheets or other similar documentation. In the case of valuing the volunteers time, since you're not paying them a salary, you want to value them at a standard rate for the industry in the area where the project operates. So if you already pay, uh, folks in your organization for similar activities, you can value their time for the volunteers in the same manner that you value your own staff time. Um, and whenever possible, the time of volunteers should be supported in the grantees files using the same methods, use it, uh, used to allocate paid staff costs. Uh, there's also a really good podcast on this from back in the day when HUD was really into podcasts. Um, it's posted on HUD Exchange and uh, we'll be sure to put the link in the chat. Next slide.

Speaker 5 00:31:55 Alright, we're going to talk a little bit about, uh, in-kind contributions starting with the in-kind goods. Uh, documenting the contribution of, uh, in-kind goods is also pretty straightforward and similar to documenting Cash Match, except that with in-kind contributions you need also need to document the method that was used to value that property or good. So documentation should be on agency letterhead with a description of the value of that good or property, uh, the method that you use to determine that value, um, the dates that it's being applied, uh, and just, you know, it's always a safe bet to include the grant number and project name it's being applied to. And then we also always got to be, uh, demonstrating through our policies and procedures that were going back, we're ensuring that was actually applied. It's actually being used for the program that, uh, it was committed for.

Speaker 5 00:32:43 Next slide in documenting in-kind supportive services, a little bit more nuanced because of the statutory requirements. So commitments of in-kind supportive services like, uh, donated mental health services or outpatient health services must be documented through an MOU or a memorandum of understanding to count towards match. Uh, and the regulation outlines very specific requirements that can be seen on this slide. Uh, these MOUs have to be provided before grant agreement, but if something changes during the course of the term, let's say halfway through the operating year and organization comes to you and agrees to provide in-kind, uh, treatment services to the project, in this case, you'll still need an MOU with everything that's on this slide. Um, and same for if

the terms or conditions change to that commitment. Um, so you just want to make sure that you, uh, have really solid policies and procedures and those checks and balances that this documentation, that there's a point person for documenting and updating these documents, um, whenever they need to be updated. And then when it comes to, when it comes to recording, uh, that the services actually occurred. Um, so going back on the back end, this can be done through the time sheets, setting up some sort of process on the front end so that your backend work is not as hard, um, so time sheets or other methods that allow you as the grantee to determine the amount of time that was contributed and the eligible activities that were actually carried out. Uh, I'm going to hand it off to Ebony to talk about grant changes. Next slide. Thank

Speaker 6 00:34:21 You Taylor. Uh, Ebony Rankin, uh, from the SNAPS office. I'm going to talk, uh, briefly about, um, grant changes and some timeliness standards. Next slide. Okay. So, and I know we've gotten some questions already in the chat, um, about grant changes. That's good. If you have specific question about a specific grant change, just uh, send an email to, um, uh, the special nofo email box. I think Brett put the, um, email box, uh, in the chat earlier and we'll put it in the chat again. Um, so, uh, for grant changes is important to remember that the same rules that are, um, these are CoC grants. So the same rules that are in 24 CFR 578.105, um, apply to our special NOFO grants. Because these are still continuum of care grants. So on the screen here, you will see, um, the four main type of grant changes that, that we normally see, um, from, um, CoC grants and from the special NOFO grants.

Speaker 6 00:35:29 Uh, and all of these changes require HUD headquarter approval. So I'll just keep reiterating that. Um, and when, when, when, what, what I mean by approval is that it is obtained by, once you identify, you need a, a grant change, you will send, um, a request, you can send it via email to your field office. It can be in a memo via email or in the email itself. Um, the request and any support and documentation, the field office will then, um, uh, send the request to their desk officer and to our, our special nofo, um, email box. Um, and then from there, uh, HUD will review and based off of what's in your request, we will either come back for more information or let you know how to proceed from there from, for the grant change. So your first point of contact for grant changes is your, um, is your local, uh, field office.

Speaker 6 00:36:24 So, um, the first one I want to talk about is budget or budget changes. So when I talk about budget change, it means like a shift of funds from one budget line item, um, to another. So it's from leasing a rental assistance, operating supportive services, H M I S, et cetera. So this does not include, um, a shift in sub light items. So if you're trying to shift funds from case management to transportation within supportive services, that doesn't require a budget change, that doesn't require an amendment that's kind of, um, still within the same budget line item. Um, and it is point to note that the 10% threshold or an amendment, a formal amendment is, uh, still required. So if you're transferring 10% from one budget line item, 10% of one budget line item to another is still required. If you're doing, and this is throughout the, the grant, so if you're doing 5% and then you do another 5%, you would definitely need an amendment.

Speaker 6 00:37:26 Um, after a while, you can't do, um, piecemeal, uh, budget changes like that. Um, less than 10% does not require grant agreement amendment, but we still require notification to HUD through the field office that you will be making, um, those budget, uh, changes or you are requesting those budget changes or population change. We have had some requests already to change, um, population or subpopulation. Uh, we've, and I've put, um, on the screen here, we've had a, um, uh, some

projects change from chronic to dedicated plus for, uh, a different reason, but this requires an explanation. We do, uh, and I have down below we do check to see if the change in population is still consistent with the CoC'S plan for serving individuals and families experiencing homelessness. And this is the plan that was submitted when the application was submitted. So we, uh, HUD headquarters still review, review that plan when we get these grant changes, especially for population to make sure it still aligns with the plan you submitted.

Speaker 6 00:38:34 Um, so just keep a note of that. And for change the population that does include change in subpopulations. So this request will go to the field office, we'll go to the special nofo box, um, and then we will review it from our end. Um, component change we do, um, you know, allow component changes for certain circumstances if necessary. Um, I've included, uh, joint TH RRH, uh, rapid rehousing. So, um, there may be a circumstance where you have a joint TH RRH and for some reason there's issues with getting RRH units or RRH units online, and the recipient may need to switch to, uh, rapid rehousing. We may allow that with, um, conversation with HUD and with some other documentation. Uh, so, but to be aware, we do not allow changes from joint TH RRH to transitional housing. So the components must be components that were allowed, um, based off of the special nofo.

Speaker 6 00:39:38 Um, special, yeah, the special, uh, nofo. So we, we do not allow joint th RH change to transitional housing. We may under certain circumstances, uh, allow it to change to, um, rapid rehousing. And then for ss, ss o street outreach, s ss o other, that's another one that we will look at your, like I said for all of these, we'll look at your C O C plan for serving individuals and families experiencing homelessness. Um, but we may allow the change, the change SSO change from street outreach to SSO other depending on the circumstance and depending on the information that you submit to HUD about it. Um, the last one, the recipient change. We, um, the, when you request a recipient change, the new recipient must be eligible to receive CoC funds. So nonprofit unit of local state government.

Speaker 6 00:40:38 HUD will check to see if there are any capacity issues to the extent that we can with the new recipient. So we do check if that new recipient is a current or formal recipient of CoC funds. We do check to see about monitoring findings. We, you, you know, we see if there's any other capacity issues with the new recipient. Um, so we work di diligently with the field office as much to get as much information as possible about the new recipient. Um, and this is a process to, to getting a new recipient. Um, a recipient change is a process. So once again, this will go through the field office to special nofo, um, mailbox for us to review. Um, a change in sub-recipient is not, or a change or removal or addition, um, to, uh, of a subrecipient does not require, uh, a grant agreement amendment.

Speaker 6 00:41:29 It is not as extensive as a change in recipient, but that's something that we still, um, ask you to notify the field office if you are going to do it. So once again, for grant changes, what's allowable is basically the same. These are c o c grants. So remember, whatever is in, um, 24 CFR 578.105 is allowed in these grants. Um, it, it's just, I'm just putting out a reminder of what changes need, um, are made and the extra addition of check in with your C o C plan, um, and making sure it goes through the chain from the field office to, uh, the Special NOFO mailbox. Um, next slide.

Speaker 6 00:42:14 And so I've added some timeliness standards here when it comes in general to the grant. As you all know, the initial grant term is three years. Now I know we've been asked already, what is the grant term when it renews? Like we have no idea about renewal for these grants yet. We still, we still have three years, um, to, to put that information out. So we, all we know right now is that the initial grant term is for three years, and this included includes the planning and UFA cost grants are for

three years, and then the operating year is the year, the date from the date the grant agreement is executed. Signed by, um, the, uh, field office director, um, and the rural grants were able to request, uh, capital costs construction, acquisition and rehab. Um, and we, uh, they have to begin within nine months of signing the grant agreement.

Speaker 6 00:43:07 And you have 24 months after that to use those funds for the, for, um, for those capital costs. And then just a reminder, like in like CoC grants, you must draw at least once a quarter. Of course you can draw, um, more frequently than that, but it has to be at least once a quarter. And also payments to subrecipients still have to be no more than 45 days from a request. It can be of course earlier than 45 days, but we say no late, no, um, no more than 45 days from a request. So that is all I have on timeliness standards. Uh, next slide. I'll turn it over to Brett to talk about the resources for help.

Speaker 7 00:43:53 Great, thank you Ebony. Um, so next slide please. I want to wrap us up before the question and answer section. Obviously this is a space where you can come and find answers to your questions, but talking more about where you can find answers over the course of operating these grants. So I want to start first with the CoC. Uh, Jamine said in her intro that these grants are not business as usual for the CoC program. And one of those ways that these grants are not as much business as usual is that all of the projects were required to be consistent with the CO's plan to reduce unsheltered homelessness for those with the most severe service needs that was part of the application. And so it's really going to be important throughout the course of administering these grants that you touch base with your CoC, that you make sure that what you're doing is consistent with their plan, um, that you make sure you're following the written standards set up for the CoC for prioritizing assistance.

Speaker 7 00:44:53 Um, throughout this grant, CoCs are also going to be monitoring the performance of these grants. Um, and so if there are any issues that you run into while operating your project, the c o C can be a great resource for technical assistance or helping you bring, uh, other needed resources to your project. So I guess long story short, keep your CoC informed regularly with how it's going. And definitely if you want to make any changes to your project, touch base with them before coming to HUD for those changes. The field office, uh, we have great, great field offices and great CPD representatives across the country and they're going to be a great local resource for you. They should be your first stop for any questions related to grant execution and grant changes. They'll be able to start the brainstorming process with you. They'll be able to give you guidance about what is permitted and what's not. And if not, they can come to us at headquarters. They can also provide requirements or answers about CoC program requirements. So they are going to be a great resources for grant changes and for questions about requirements for operating these grants.

Speaker 7 00:46:07 Also technical assistance providers, every CoC that received an award under the unsheltered nofo under the special nofo, either through the unsheltered set aside or the rural set aside, was assigned a technical assistance provider to help with the implementation of the CoC'S plan that your TA provider, uh, you should know who they are at this point, they should have reached out. Um, but they can answer questions about CoC program requirements, obviously, but they are also going to be one of your best resources for troubleshooting, brainstorming, and implementing promising practices throughout your continuum as it relates to reducing unsheltered homelessness and as it relates to adopting best practices in your projects. And then there are two resources where you can receive written answers to your questions. Uh, the HUD exchange AAQ, this is a spot. These grants are CoC program grants, right?

Speaker 7 00:47:01 They generally follow CoC program requirements. So the HUD Exchange that ask a question, they can answer grant, they can answer questions about CoC program requirements. If you think that, um, you have a requirement that is unique to special nofo, then you can email special coc nofo at HUD dot gov. Um, and we can answer questions through there about those costs. For example, um, information about rural costs. There were specific rural costs called out in the special nofo that are not normally eligible under the CoC program. The Special CoC NOFO box can help to answer those questions, and if you don't know, send it to your best guess. And we at HUD we'll make sure that it gets routed to the right place and that you get your answer. Uh, and I think at this point I'm going to turn it back to Marlisa and we can start answering some of the questions that you all have been submitting in the chat.

Speaker 1 00:48:02 Great. Thanks to all the presenters. Uh, please keep bringing in your questions to the chat. I'm going to just, um, pick out some of the more popular questions, um, some re repeat questions and make sure that you all are seeing the responses. I am going to flag this initial one to Brett. Um, Brett, does HUD have a common expectation or definition around the term unsheltered for program participants? So is a participant considered to be unsheltered if their residents at first point of contact was an unsheltered location like the streets, but they're currently living in shelter or, um, are we looking at a particular amount of time that they experience unsheltered homelessness? Can you speak to the definition and what and how we're using the term unsheltered?

Speaker 7 00:49:02 Sure. So we actually did not define unsheltered homelessness in part of, in the nofo. Um, and I think what's most important to note is that eligibility is not limited to people who are currently experiencing unsheltered homelessness. I think that tends to be the crux of the question. We're going to talk a lot more about eligibility next week. Um, so join us then. But I think what's important to note for now is that eligibility under the unsheltered set aside is limited to categories one, which includes people living in places not meant for human habitation and category four of the homeless definition. And then if you have a grant under the rural set aside eligibility is limited to categories one, two, and four of the homeless definition. But then layered on top of that is a requirement that all projects be consistent with the COC's plan for serving individuals and families with severe service needs who are experiencing homelessness.

Speaker 7 00:50:00 That's kind of a mouthful. Um, but part of the CoC'S plan was their strategy for reducing unsheltered homelessness and their written standards for coordinated entry for how they were going to prioritize folks for assistance under the projects funded through this nofo and how that was going to be related to their plan for reducing unsheltered homelessness. So this is another space where you're going to want to check in with your CoC and see if on top of HODs eligibility requirements, they put in place additional layers of prioritization to help reduce unsheltered homelessness that you're going to want to be familiar with.

Speaker 1 00:50:42 Great, thank you. I'm going to direct this next question to Ebony. Um, Ebony, you were talking a lot about grant changes. Can you speak to the timing of that, whether it's just prior to going to grant agreement, um, or if it, if any changes could be entertained post grant agreement?

Speaker 6 00:51:06 So, uh, a lot of the changes that I mentioned can be, can be done prior to grant agreement. It still will require the notification, um, to HUD an approval by HUD. Um, which will like, especially if you're doing budget change, will likely not, uh, not require it to be a grant agreement amendment if it hasn't gone a grant agreement. So if you're still in that, in that technical submission

phase, it is possible to get it done, um, get certain, uh, changes done beforehand. Um, and if you, if you don't, you have to go to grant agreement first just to get started and then submit a change later, we can do that too through amendment. So it really just depends on what your change is.

Speaker 1 00:51:52 Okay. And Ebony, since you are already answering that question, can I tack on another and um, can you let everyone know if there's an expectation for recipients to spend the grant equally over three years? Or how does the timing of grant expenditures work?

Speaker 6 00:52:15 Yeah, so we, so these are three year grants. You're getting all of the funds available to you, but we are not recommending you spend, you know, because we are, you're expected for, um, to, you're expected to do these projects for the three years that you are getting the funding for. So there's nothing, um, you know, in locks or anything that's cut, that's cutting you off after a certain amount of time. That's, that's divided into three years. But we are definitely not, um, promoting you using, you know, the bulk of your funds the first two years and then you have another year left where you're still, you're still supposed to be serving clients in that third year, but you ran out of funds. Uh, we still expect you to serve clients for the entire three years of that grant. So, and I don't know if Brett want to add anything. I know we've gotten this question before in the, in the AAQ,

Speaker 7 00:53:11 Nope, nothing to add. Okay.

Speaker 1 00:53:15 Okay, Taylor, uh, we had, we got a good number of questions about match, so I want to direct this next, next one to you. If, um, if a recipient documents anticipated match above the required minimum of 25%, are they then held accountable for tracking and documenting the higher amount or just up to 25%? So is it preferable, is there an advantage to only documenting match of 25% even if a recipient were to expect additional match funding?

Speaker 5 00:53:55 Yeah, so this is actually something that came up um, with, uh, Carrie brought it up in the point that, um, oftentimes what we see in HUD monitoring when we go out to monitor the match, uh, sometimes we find that match, uh, that you've documented over the course of the, the grant year was ineligible and so if you've already been documenting more than 25%, you can kind of knock some of the ineligible out and still hit that 25% and there, or not having to repay any money. So, um, it's always good to document a little bit more if you can. Um, but whatever the, we talked about the four points in which you're verifying match, so really ensuring that you have a tight process on tracking it on a monthly or quarterly basis. Most of my grantees have talked about doing it on a monthly basis when they draw down, so they're going back and verifying that it was actually applied there, then you have a much, uh, better handle on it. But, um, documenting more couldn't hurt if, uh, in case of an emergency.

Speaker 1 00:54:59 Sounds good. Keeping on the topic of match, um, Taylor, can you sort of speak to whether or not you can update your match commitment from what you had originally proposed in the application? So can you shift from, uh, in kind to cash match, um, if you were to need to do that, how would you go about doing it? Is that permissible?

Speaker 5 00:55:28 So, I don't know entirely the procedure across the field, but I can speak for the experiences that we've had. It's as long as you're keeping an open communication with your, your HUD rep, I think that's the best way to go about it. Uh, but also keeping an handle on whether it changes whatever it may be, and making sure you have the correct documentation in place at that time. Uh, what you don't want is to get to the end of the grant period and you haven't updated any of the

documentation and HUD's coming out to monitor and you don't have anything to give them, um, or it's all wrong. So, um, uh, updating, I think it's, uh, you do need to update it in accordance with real time. Uh, as far as any additional, um, items, I don't know if you want to speak to Marlisa, what you would expect from the Snaps office who no reverse.

Speaker 1 00:56:18 I'm going to, I'm going to open that up to anyone from, from Snaps who has like additional details to offer up. I know Ebony answered in the chat that you can make you, you should be able to make the updates in EAPs. So feel your field office, your C P D rep should be a great resource to be able to do that. And then, you know, we, you always have the AAQ for um, an eSNAPs question if you're running up against any technical problems.

Speaker 6 00:56:48 Yeah, and Marlisa, sometimes there are technical problems that we don't necessarily know they're going to have until we try to do, someone tries to do a change. So definitely don't feel shy about sending it to SNAPs. Um, and I'll put that in the chat to EAPs email um, as well.

Speaker 1 00:57:07 Great. I saw in the chat that somebody had a question about not get, not hearing from their TA provider yet. And I just wanted to clarify that if you received an unsheltered special nofo award, you should have heard from your technical assistance provider already. If you haven't, please reach out. Um, you can reach out to one of us on the panel or you can submit a question to the special Nofo C O C mailbox. Um, however, because we were just, just because of the way Snaps has been processing our work plans and everything, you may not have received initial contact from your technical assistance provider if you are a rural special NOFO award recipient. So, um, TA for the unsheltered awards are tracking a little bit differently for than the rural awards. So if, so don't panic if you have not heard from a TA provider yet and you are a rural special NOFO recipient. Alright, I'm going to check the chat as well as our list of responses. This one is a little bit confusing so I'm not going to put anyone on the spot, but I'm offering the panelists to chime in if they have anything else to um, add to the chat response. But when it comes to assigning a value to volunteers time for matching purposes, should you use the hourly rate your agency pays to staff to do similar work or use the independent sector estimate, which is approximately \$31 per hour for 2023,

Speaker 7 00:58:58 I can take that <laugh>. So if you have volunteer, if you have staff in your own organization that provides similar, that do similar work, then you can use the value that you pay your staff, uh, in the agency. So if you have someone volunteering time for, I don't know, food prep and you have someone in your agency who also does food prep, then you can value the volunteers time for whatever you pay the person who's on staff. If you do not have somebody on staff carrying out the work that the volunteer has provided, that's when you're going to want to use the standard rate for the industry.

Speaker 1 00:59:34 Great, thank you. So just pulling some additional questions from the chat. Uh, just a reminder that the recording as well as the slides will be accessible and the chat I believe is also going to be available to everyone after the presentation. And we will have one of our sessions covering reporting. So that is going to be a subsequent training session. One of the panel, if one of the panelists knows which session that is, please chime in. But otherwise, um, just please, please keep tuning in and know that that is going to be covered in an upcoming session.

Speaker 8 01:00:21 Hey Marlisa, that's on the third session.

Speaker 1 01:00:26 Great, thanks William.

Speaker 3 01:00:30 Marlisa, I noticed we have a lot of questions about Match and I just want to remind grantees that the HUD Exchange has wonderful FAQs, unmatch, everything from in kind M O U information to what is Cash Match, what is in Kind Match. That's always a great resource.

Speaker 1 01:00:50 Thanks Carrie. And the other thing to remember is that, you know, we did do kickoff sessions for these special no four awards there. There was one that was done for unsheltered awards, one that was done for, for rural. So that's another great resource to keep referring back to. If you've, your experience during this session is that you, um, kind of the fire hose effect another great resource to tune into between sessions is that kickoff? Um, the, the kickoff training, which gives you sort of a baseline understanding of what's going on. Um, I think, you know, the emphasis is that there, by and large, the requirements for these special no forward awards are largely the same. And what we will try to do in this session and subsequent sessions is highlight the differences so that, um, so that you're able to read those out as well. And another question about APR and SAGE reporting, and we did answer that. Session three will cover reporting requirements and more guidance about a p r req requirements or QPR requirements as well. All right. Um, any additional questions that panelists would like to cover?

Speaker 7 01:02:16 Yeah, um, Marlisa, can we go back to the match stuff? Because Carrie's right there were a lot of questions that came in on match. Um, and so maybe if we could flip back in the slides to the, there was like a timeline that had match on there. Yep. That one right there. So a few things let's just like kind of go through this and feel free to jump in Taylor, because I know this was your slide, but there's match documented at, at different times throughout your grant cycle, right? So at time of application you were required to submit what you thought you would have as matched to meet the 25% match requirement for the, for the project. Now you submitted your applications back in October, right? And now you're just going to grant agreement and it makes sense that things have maybe changed or we looked at your application and we decided that some of your match documentation wasn't sufficient.

Speaker 7 01:03:15 Um, and so during the grant agreement execution process, when you're working through your technical submission with your C P D rep, you're going to have to probably update some of your match documentation. And this is where you'll work through the technical submission process and you will, if something was determined not to be sufficient, you can either update it or you can say, oh, well then that doesn't meet the requirements, but I have this source of funding and you can switch out cash match for in kind. But still at time of grant execution, before we can sign your grant agreement, you need to document all of your match requirements. So 25% of the total amount you are awarded for all three years, um, minus any funds for leasing, you're documenting that prior to grant agreement execution through all of the different, um, resources that Taylor talked about.

Speaker 7 01:04:05 Um, and then it's a three year grant. Things are going to change, right? Some cash that you thought you were going to get or an organization thought that they were going to be able to provide to you that might fall through or they get more or they get less, who knows? So as things change, you're going to want to document the match that you are receiving in accordance with all of the requirements that we talked about in today's webinar. So if an end kind service falls through, because I don't know the, the agency had to shut their doors or something and you were able to get cash match in stead to meet the difference in what they weren't able to provide, then you document cash match in accordance with the cash match requirements. Always a good idea to touch base with your field office to make sure that your documenting it correctly and they're aware of the change. And then in the a p r,

that's where you're going to just document the total amount that you had each year for match for that year. Um, and yeah, hopefully that's helpful. Uh, and clarify some of the questions that came in. I know Taylor or Carrie if you would add anything to that.

Speaker 9 01:05:20 Thanks, Brent.

Speaker 1 01:05:28 All right. So I know that there are also a number of questions about whether or not you could make a specific change to your grant, um, now during this technical submission phase. And I think the overarching guidance without getting into too many specifics would be, um, submit a question to the special nofo C O C mailbox to see if it's feasible and also talk to your field office to see if it's a change that could, that could happen. Um, we had some questions about budget changes between budget line items, component changes between RRH to TH RRH or um, to from joint to PSH. Do we have a panelist who wants to cover that?

Speaker 6 01:06:22 That one. So for the change within, um, the actual budget line items is possible, does not require an amendment. Um, I gave the example of if you're changing funds from case management to transportation within supportive services, that's not, that doesn't require a grant agreement amendment because that still stays in supportive services for the change of a specific component that I, um, for a specific component, just contact your field office because we'll have to look at the circumstances of that change. So from joint to PSH or RRH to PSH uh, that may require a lot more conversation between us and the recipient that's asking for the change and us reviewing their um, CoC plan. Because it goes back to reviewing the plan to make sure it still matches what, what was intended when we, when the application was put in. So,

Speaker 7 01:07:17 And then also we have to look and make sure the project would, in addition to the plan, would it have passed capacity review. Right? So I know we've had a few requests to date for changes from S s O to permanent housing and we've not been able to allow those. One, it wasn't consistent with the plan. And two, there's just not enough information in the SSO project to determine capacity threshold for a PSH grant. These changes are, are rarer than I think we made it sound like today. But they're possible, but they aren't super common.

Speaker 1 01:07:55 And where would you find conditions? Are they within the contract agreements? EAPs, where would, where would a recipient find conditions for their grant

Speaker 9 01:08:06 Steps? Yep.

Speaker 1 01:08:10 So I believe that's what you were referring to, Janice. If not, please just add a little bit more specifics and we can try to cover that. All right, great. I'm going to pause one more moment to see if any additional questions come in or if any other panelists are sort of keeping an eye on the chat and would like to uplift some commonly asked questions or some, some good ones to share. All right. Well we are all looking forward to seeing you all next Wednesday. Please tune in. Um, a reminder that we're going to start the session off with some questions and answers and you can cover this session's questions. So feel free to review the material, come with your questions. We'll spend some time doing q and a before we dive into the next session's materials. And we will post this session's materials as quickly as we can. So thanks so much for tuning in and we'll see you next week. Have a great day. Bye-Bye everybody.

Speaker 0 01:09:38 That concludes our event. Thank you for using event services. You may now disconnect. <silence>.