

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 0 00:00:00 Welcome and thank you for joining today's conference, special NOFO Startup Session Grant Administration basics. This meeting is being recorded and all audio lines are currently muted. Before we get started, please just make sure you've opened your chat panel by clicking the chat bubble icon at the bottom right corner of your screen. If you need any technical assistance, you can please send a chat message to the event producer and when we get to the Q&A portion of the call, you can send your chat questions to everyone from the dropdown menu in your chat panel. With that, I'll go ahead and turn the call over to Marlisa Grogan from the Snaps office. Please go ahead.

Speaker 1 00:00:51 Hi everybody. Great to see you today or be with you today. Next slide please. Before we get started, I'm going to briefly go over the agenda. We have, we're going to start out with a, a session quick Q&A to take any of your questions that you may have from the last session. We're going to then transition over to the material that we're going to be covering today, including program participant eligibility, the program components, then reviewing eligible costs. And we will have time at the end to continue with the Q&A, which we'll be pulling from the chat. Next slide please.

Speaker 1 00:01:36 So we're going to take about 10 minutes just to take any questions that you may have had from the last session. For those of you who didn't join us, we started out our startup training with special conditions or satisfying conditions related to site control, financial feasibility, environmental review match, another grant change information. So, if you have any questions related to those materials, please feel free to enter them into the chat right now. If you weren't able to join us or if you'd just like to be able to review the material that we covered last week, you will have access to that. We're working on getting them posted by the end of the week on hud.gov. So, the slides, the webinar recording, the chat materials, which will all be posted on hud.gov. So, we'll take a moment here and give you all time to enter in any questions. And I see that we're starting to get a few. Alright, it looks like the first question that we have is, can grantees utilize their rent as a match? Do we have anyone on the panel who wants to volunteer for that one?

Speaker 2 00:03:14 I can give it a go. Marlisa. <laugh>. Hi everyone. Brett Esders with the SNAPS office. It depends. So, if you're talking about using like another voucher, are you, so if you're using for example, a housing choice voucher, you can use that as match so long as the voucher is committed to your project. And you're only counting the, the PHAs portion of the payment, not the client's portion of the payment as match. If somebody is donating you a building, then you can count, the value of the building as a match. It kind of depends on what you're talking about. When you're talking about can you count rent as match if you're talking about office space, if someone is donating you the room, and is it being committed to you? And those are the types of things you'll want to, to look through. But certainly, it's possible.

Speaker 1 00:04:18 Thanks Brett. And I'm taking one more look here. We have another question. Do we have to demonstrate that the client is engaged in supportive services to count their stability voucher or housing choice voucher as match?

Speaker 2 00:04:43 Yeah, I can just finish on this one. So, in order to count something as match and this, we went over a little bit last week upfront, you have to have the commitment from the PHA that the voucher is being committed to your project for the period of your grant. And then you are, you're documenting it like you would document any other program participant. So, you're documenting that it's

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

being used on somebody who's enrolled in your project and that they are receiving supportive services and everything else that comes along with your project.

Speaker 1 00:05:20 Sounds good. And then just a reminder from everyone that the webinar materials, the recording, the chat, these slides are going to be available on hud.gov by the end of the week. So, whether you weren't able to tune in or whether you want to watch again, you will be able to access those materials on EC of at the end of the week. We're working on, on just finalizing and posting them. We have an environmental review question, so I'm wondering if I can toss this one over to either Carrie or Taylor. The question is, are environmental reviews required before grant execution or after and for all projects?

Speaker 3 00:06:08 Hi, it's Carrie. They are required for all projects, and they are required before you make any choice limiting actions. So that could be signing a lease for units or signing a lease on, space that you're going to use for supportive services. They don't necessarily have to be completed before the grant is executed, although some field offices may require that, but you can't make any kind of choice limiting action and turn to any kind of contract before they are complete. And I think we had a question last week about, because since we're on environmental reviews about environmental reviews for coordinated entry and that environmental review was done nationwide by OEE. So, if you have just a coordinated entry grant, your environmental review was completed as part of a nationwide review.

Speaker 1 00:07:04 Great. And it looks like we just got that one again. So good call answering that one. Carrie, this is another environment. Oh, Taylor, go for it.

Speaker 4 00:07:15 Yeah, I just want to say, if you don't have a copy of that, because what your HUD rep, when they come out to monitor, they're going to be looking to make sure that you have that on file. It's your responsibility to make sure that you have that so that nationwide review, you should reach out to your HUD rep to get a copy of that for your program files.

Speaker 1 00:07:35 And keeping on the environmental review topic, who can sign off on the EA, can the county sign off or does it have to be the municipality? Carrie, are you comfortable answering that one?

Speaker 3 00:07:55 So that is going to be whoever, the responsible entity is. So, if the municipality is comfortable doing that and is considered a responsible, that's fine. Otherwise, the county may be, or it could go up to the state. So, you're going to have to kind of start at a lower level like the city or the municipality. And if they are not willing to take on that responsibility, then move to your county and possibly state level, your HUD rep should be able to help you with this if you're having issues or your program environmental specialist as well.

Speaker 1 00:08:34 And I'm going to direct this last one to you again, Carrie, if we're using hotel vouchers, what is needed for environmental review?

Speaker 3 00:08:46 Hmm, that's a good one. So, hotel vouchers, I think I'm going to have to look into that one because, because my assumption is you are choosing the hotel. let me, let me look into that because I'm trying to equate it to rental units, but I don't know that that's quite the same. what would the hotel vouchers like what type of funding would the hotel vouchers be paid for? With supportive service? Yeah,

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 2 00:09:16 That might be Carrie. This is one of the new eligible costs, so it makes sense that we'll have to look into it, but they can fund it in one of two ways. They can rent a portion of a motel, or they can lease a portion of a motel, in which case the recipient probably is choosing the motel. Or it can be a hotel motel voucher, more like what we would normally see in the E S G program.

Speaker 3 00:09:37 Yeah, if they're leasing part of a hotel or a motel, then I would say that that is going to be a limited review or limited scope review. But I would have to look into like motel, motel vouchers

Speaker 1 00:09:51 And, Roseanne, which may be a good question to submit to the special, C o c NOFO mailbox. We can put the email address in the chat and if you could tell us a little bit more, give us a little bit more detail about what your hotel voucher pro activity involves, how you're setting it up, then we can provide you more information about the level of review that would be required. All right. Let's try to fit in a couple of more, a couple of additional questions that, tailored that or, Carrie the nationwide environmental review. Did it also cover HMIS and planning projects?

Speaker 3 00:10:36 Yes. So, it covered HMIS planning, supportive services only and coordinated entry would be part of that as well.

Speaker 1 00:10:50 Got it. All right. shifting over to stability vouchers, Brett, this may be a good question for you. Do the stability vouchers come with guidance to PHAs that make them low barrier compared to other PHA subsidies?

Speaker 2 00:11:12 That is a good question. we can loop back with our office of Public and Indian Housing. They certainly got the, the notice that has all of the available waivers that they have, which helps to make them low barrier. But I, we'll have to touch base with them to see what sort of guidance they're looking to put out. And if there's something that we can help with, certainly let us know. That's another great email to the Special CoC NOFO and then we can coordinate internally as well.

Speaker 1 00:11:44 Sounds good. Alright, so with that, I'm going to shift over to the material for today. Next slide please and turn it over to Brett to cover program participant eligibility.

Speaker 2 00:12:07 Great. thank you so much. Next slide please. Okay, so I want to start off today and over the next few slides talking about program participant eligibility and determining homeless status and documenting homeless status. And over the next few slides, we're going to talk about determining and documenting homeless status for three of the four categories under HUD's homeless definition. But even though I'm going to review all of that information, it's going to be really important to remember upfront which categories of the homeless definition your project can serve. And so that's going to depend on which Set aside your project was funded under for projects funded under the Unsheltered SETASIDE eligible program. Participants are those who meet categories one and four of the homeless definition. And additionally, all projects have to operate consistently with the CoC's plan to serve individuals and families experiencing homelessness with severe service needs, which is a bit of a mouthful.

Speaker 2 00:13:09 So I'm probably just going to call it the CoC's plan for the rest of this. and part of that plan was to demonstrate how resources provided through the NOFO would reduce unsheltered homelessness, including how the CoC would establish eligibility and coordinated entry processes to reduce unsheltered homelessness. So that means each CoC might have slightly different eligibility or

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

prioritization standards, depending on what they submitted with their plan. And as a project, you are going to have to be, you're going to have to follow those in addition in addition to HUD's limitation on categories one and four. Next slide please. Okay. So, if you were funded under the Rural Set Aside, the NOFO said that you could serve individuals and families experiencing homelessness who qualify under any of the categories of homelessness, but you needed HUD approval to serve category three.

Speaker 2 00:14:08 And no CoC was approved to serve category three. So that in effect means that projects funded under the rural set aside can serve individuals and families who qualify as homeless under categories one, two, and four. And as with projects funded under the unsheltered set aside, rural Set aside projects also have to operate consistently with the CoC's plan that they submitted with their application. So, there may be a few additional eligibility or prioritization layers that come from the CoC. Okay, so now let's dive into determining homeless status. And I think what is really, would, will be really helpful is documenting homeless status. So, if we go to the next slide.

Speaker 2 00:14:55 Okay. Starting with an overview one, as a bit of an overview, everyone, all recipients and sub recipients have to have policies and procedures for documenting homeless status in their agency records. The c o c regulation requires that these policies and procedures establish an order of priority for obtaining documentation as third party first intake worker, observation second, and self-certification of the individual or head of household seeking assistance as the last order of priority. Though we'll walk through, there are a few instances in the homeless definition documentation standards where there are, a separate order of priority or a different order of priority has been approved. next slide please.

Speaker 2 00:15:46 Okay, so there is a lot on this slide. There's a not lot on the next three slides actually, or four slides. You'll hopefully be able to see it more clearly when you go back and review. But for now, most of this information comes from a link on our website that includes the criteria and record keeping requirements for the definition of homeless in a consolidated two-page version, which we can post which Taylor just posted in the chat. So, if you want to take a look at that as I go through these slides, you can follow along there. So, category one, this category of homelessness includes those individuals and families living in emergency shelters, places not meant for human habitation, transitional housing, safe havens. It also includes individuals who are exiting an institution where they resided for 90 days or less and who were residing in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Speaker 2 00:16:44 Institution think hospital jails, mental health facilities, places like that. So how do you document that? We're going to start with the order of priority that we just talked about. You're going to want to first look for third party documentation. This can include an HMIS record of a street outreach contact, or an emergency shelter stay. Or it could include a written referral from a shelter provider that somebody stayed there and the dates that they stayed there. It also could include an oral statement from the shelter provider. Like if somebody came to you and said, I stayed here but I don't have a piece of paper, you can call over to the shelter and they can look in their records and say, yep, they stayed here. And you can document that you talked to someone on the phone and date it. If none of this is available and you as the intake worker didn't observe the individual in these locations, then you can accept a written signed certification from the individual or head of household who is seeking assistance that they were living in one of these situations describing the situation to the extent it is safe.

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 2 00:17:50 So they could say, for example, that I was living in my tent in the woods behind Elm Street and the dates that they were living there, and then they're going to sign it and you put that in the case file. But when you do that, you're going to want to document any due diligence that you attempted to obtain a higher level of certification. So, let's say they said they were staying in the woods behind Elm Street. Did you try to reach out to the outreach workers in the area and see if anyone knows them? Or maybe you have someone who you also know was staying in a similar location. Did you see this person? Do you know this person? but in no instance should an intake worker say to the person, go back to the shelter or go back to your outreach worker and get that third party documentation and bring it back to me. You don't need to do that. You should try as the intake worker to try to obtain it. And if you can't take that self-certification and document that you, you tried, you <inaudible> higher level of documentation.

Speaker 2 00:18:57 So moving on to the second portion of it where you're documenting that someone stayed in an institution for 90 days or less, you first need to document the stay in the institution. And that can be done through, well, you'll want to document three things here. The stay in the institution that it was 90 days or less, and that the person resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. So, as you can kind of tell your documentation for this portion is going to need some dates. So, if you follow the orders of priority, you're going to first be looking for third party documentation of the stay in the institution. This could be discharging paperwork. Someone may come to you and have their discharge paperwork. It could be they said they stayed there, and you called over to the hospital and they, they're able to say, yes, they were here. And you need those dates because you need to confirm that it was 90 less than 90 days or 90 days or less. So, you'll want to know the person stayed here from August 1st to August 25th, and then you can confirm that it was less than 90 days. You also need those dates because you need to show immediately prior to entering that institution that they were staying in a place not meant for human habitation or an emergency shelter immediately before going into the institution.

Speaker 2 00:20:20 And again, you're going to want to try to get one of the third-party documentation that is above first. But if you're not able to get that and you've tried, you reasonably tried and you're able to document those attempts, then again you're able to take the head of household's written sign certification that they were in fact staying in in an institution, the dates that they were there and that they were they have been sleeping prior to entering the institution. Okay. next slide please. Moving on to category two. And remember, for those of you who have received funding under the unsheltered set aside, you can maybe tune me out for the next three minutes because this portion isn't going to apply to you. Only projects that were funded under the rural set aside can serve those who qualify under category two. So, this is the category of the homeless definition where individuals and families are going to lose their primary nighttime residence within 14 days of the date they're applying for assistance and that they have not identified a subsequent residence and that they lack the resources or support networks to obtain other permanent housing.

Speaker 2 00:21:35 So for the first part, the residents that will be lost within, or that the residents will be lost within 14 days. If you're following the orders of priority, you are going to be looking for third party documentation first. This can include a court order resulting from an eviction action. This can include a letter from the person they're staying with saying that they can no longer stay there. This can include calling the person they're staying with you as the intake worker calling over to the head of household and confirming over the phone that the person says they can't stay there anymore. And

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

writing that down in the record. If at any point the person tells you it's not safe to call that person for their own safety, don't call that person and make the note in the file that it wasn't safe, and the client said that it wasn't safe.

Speaker 2 00:22:26 and again, as a category one, if it's not possible to obtain the third-party documentation, you can accept written, signed certification by the head of household that includes where they're living and that they have to leave within 14 days. And again, you're just going to want to document any reasonable efforts that you made to try to obtain the third-party documentation for the second and third part. So, no subsequent residence has been identified and the individual or family lacks the resources or support networks to obtain other permanent housing. This is, in this case a written signed certification by the head of household that these things are true is sufficient. We don't expect you to go out and look for third party documentation to document a negative.

Speaker 2 00:23:14 Next slide please. And for those of you who are funded under the unsheltered Set Aside, come back to me now because this is a population that you can serve. This is category four. So, projects funded under the rural set aside and the unsheltered set aside can serve people who qualify under category four. And this is the portion of our definition that incorporates individuals and families. And this is a mouthful, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family that has either taken place within their primary nighttime residence or makes them afraid to return to their primary nighttime residence. these individuals and families must also have not identified a subsequent residence and lack safe resources and support networks to obtain other permanent housing Safety is going to be really critical in doc in thinking about documentation for this, category of homelessness.

Speaker 2 00:24:19 So for category four, the documentation standards differ depending on whether your organization is a victim service provider or not. If your organization is a victim service provider, that's what you see on the screen right now in this case. Third party documentation is never required. The orders of priority that we talked about in the overview do not apply here. This is the deviation for victim service providers for all of this. You can accept an oral statement from the individual or head of household that's seeking assistance. And then you as the intake worker, record that in the case file and you sign off on it that it is true and complete that this is what they said. And then if you go to the next slide, this includes same definition, I'm going to have to relabel the slide because this is not quite right. This is for organizations that are not victim service providers, when it is safe to do so.

Speaker 2 00:25:27 And if the household determines whether it's safe to do so, then you are going to try to follow the orders of priority. So, you're going to want to look for third party documentation. This can be from another organization that confirms that they are in fact fleeing or attempting to flee one of these dangerous situations. This could be a letter from the hospital, a clergy member. It doesn't have to be, it shouldn't, it doesn't have to be. It's whoever they think can safely give you this information. If anyone can safely give you this information, if they say it's not safe for me to ask anyone to give you this, then a certification by the head of household that they're fleeing or attempting to flee one of these situations, that they sign is true and complete is sufficient. And then you'll just want to write in the case file why third-party documentation was not possible to obtain.

Speaker 2 00:26:22 And this can very simply be the family said it wasn't safe to do so. and it's important to note here that any documentation either for a victim service provider or for an organization

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

that's not a victim service provider needs only include the most basic information to determine that the household meets the criteria. We do not need or want a lot of details about the violence that they are fleeing. You just need the very most basics to determine that they meet that first part. And then for the second and third part that they have no other safe residents and that they lack the resources and support hours to obtain other permanent housing. This is certification by the individual or head of household seeking assistance. Or it could be an oral statement that you as the intake worker document in the case file. again, it's important here to stress the safety. If they say they could go stay somewhere, but it's not safe, then that's not actually considered another residence. If they can't use it, if they have a credit card, but they can't use it because then their abuser will be able to find out where they've gone, that's not a resource because it's not a safe resource that they can use.

Speaker 2 00:27:36 and just one final thing to talk about here. Some of you may know that there have been some statutory changes made to category four of the definition. I'm not going to cover those statutory changes today for time purposes. And I think most communities are still using the original definition. Just know that we do intend to do rulemaking on the new definition. And in the meantime, if your C O C has chosen to use the new definition, they'll need to update their policies and procedures, as will recipients, for serving that population. We sent out a listserv message a while ago on what CoC's need to do, and we will continue to do training and rulemaking on this new portion of the definition as more information comes out. Okay. That was a lot. before I turn it over to Ebony though, I just want to go to the next slide and talk about really quickly terminating program participants because there has been, there are requirements around terminating program participants and there's also been some confusion there.

Speaker 2 00:28:45 So we've determined eligibility program participants are enrolled and hopefully they're housed through your project and the assistance needs to be terminated. I want to start that conversation by highlighting an important, some important distinctions in terminology exiting a program participant versus terminating a program participant. So for exiting a program participant, if a program participant is no longer eligible for assistance, and this is often going to happen in rapid rehousing assistance, for example, when they're timed out, they've already reached their 24 months of assistance or whatever maximum amount is established in your community, then they're exited from the program, they're not terminated from the program. And this is important terminology because like I said, termination comes with some very specific things that you need to follow.

Speaker 2 00:29:40 So when you're actually terminating a program participant, this is when c o c program assistance is being cut off because the program participant violates program requirements, you can only terminate assistance in the most severe cases. And because all of these projects are operating as housing first, none of none of no one on this call will be terminating program participants' assistance because a program participant refuses to participate in supportive services. So very likely termination of assistance is going to be rare, under these grants, but it could happen. And if it has to happen when terminating c o C program assistance, there is a formal process that the regulation outlines that has to be followed before termination can occur. and it includes the due process standards, which need to be followed. and you can find all of those in the section of the regulation that you see on the slide.

Speaker 2 00:30:44 and then I think just one final note, because we, we receive this question a lot through the AAQ termination is also different than eviction. It is very possible that a program participant could be evicted from their unit, but this does not mean that you as a recipient have to terminate them

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

from the project, particularly in a tenant-based scenario. That's where you can then help them use their tenant-based voucher to move into a new unit. So, eviction does also not equal termination. I think you're done with me for a little bit and I'm going to turn it over to Ebony to talk about program components and eligible costs.

Speaker 5 00:31:25 Thank you, Brett. next slide. So, I'm going to use my time to go over some pretty basic information about program components and eligible costs. next slide. Okay. So, permanent housing, as most of you guys know, permanent housing, comprises of permanent supportive housing and rapid rehousing. for permanent supportive housing, the housing is provided for eligible households where the individual, where individual is part of a household, or the head of household have a qualifying disability. and of course, they must also be qualified, under paragraphs one or four, which Brett discussed earlier. So once again, for permanent supportive housing, individuals have to have a disability, or in the case of a household with multiple people, the head of household has to have a qualifying disability. for permanent supportive housing projects, they must provide and make available services to participants to help them live as independently as possible.

Speaker 5 00:32:34 however, since all the special NOFO projects must be housing first, you cannot set the condition of using services in order for a participant to get housing. So, what we say, permanent supportive housing, has to have available those necessary services, for participants. They cannot require a participant to use those services in order to participate in permanent supportive housing. and it can be all types of rental assistance, whether it be tenant based, project based, or sponsor based rental assistance. And it can be leasing, and rapid rehousing is short- or medium-term housing, up to 24 months. And it's tenant-based, rental, it's tenant-based rental assistance. but it does require a reevaluation, at least annually of the program participant resources to make sure they, to see if they still like the resources to be in the program. and participants must meet with a case manager at least once a month. next slide.

Speaker 5 00:33:41 Another program component we have is our joint transitional housing slash rapid rehousing component. And a lot of you guys see this on the CoC side, it combines, TH with rapid rehousing. For projects like this, both types of assistance must be available. So even if you're only requesting funds for rapid rehousing, units, or funds for transitional units and, from, from the special NOFO, you must have the project must have available, both types of assistance. for projects who did not, would've see either HUD would've rejected their project, or we would, for those that only provided rapid rehousing, we may have changed a component to rapid rehousing. While both of these project components have their have their separate or separate assistance, the total amount of as assist of assistance cannot long, can be no more than 24 months.

Speaker 5 00:34:45 And that 24 months can be divided however the program is designed and how and what's the best fit of participants. So, you can do 2012 months of, transitional housing, 12 months of, rapid rehousing, or six months of transitional, 18 months of rapid rehousing. You may, also in, in the joint t h RRH program, you may have participants that only utilize the rapid rehousing portion, will only utilize the transitional housing, portion. And when I say only utilize, you're not just signing up for them up for TH it is maybe they, go into TH and don't, you know, and find h some kind of permanent housing after they have th and don't need the rapid rehousing portion. That is okay too. Or maybe, folks are coming in, they, you offer them th they don't need it, but they may, be enrolled in a rapid rehousing portion that is, possible too. Next slide.



Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 5 00:35:49 Okay. For supportive, SSO projects, supportive services only, projects, we have two types. We have SSO coordinated entry and SSO only. So coordinated entry is exactly what the name says. It's for creating or retaining or coordinated entry process. and there are certain requirements for that coordinated entry from the special NOFO. It has to be easily available, easily reachable. It has to be accessible for people with disabilities and accessible for within the entire CoC, the CoC's entire geographic area. It has to be a standardized assessment process, and then a pro. And we, we don't endorse any type of standardized assessment process. It just has to be standardized. and then the program participants, they, we expect them to be directed to the program that best fit their needs, either, whether it be, you know, whether it be a special NOFO program or CoC program, or whatever type of housing. But they need to be directed to appropriate housing and services that fit their specific needs.

Speaker 5 00:37:02 for SSO only supportive services, which is what it, what it says it is, it only provides supportive services with those with the highest service needs. and, and that's include people with, unsheltered histories of unsheltered homelessness. And of course, it has to be consistent with your plan. the c o c plan, as Brett said, all of these must be consistent with your, with your CoC plan. And they also participate in coordinated entry for SSO only, grants. Now what SSO only is not if you have, if you have applied for only supportive services funds, but there's housing somehow that's tied to that, whether it be other vouchers or some other type of housing for eligible participants, which is not a SSO grant. That is, that would be a PSH or joint or RRH, depending on what component it fits under grant.

Speaker 5 00:38:04 So only is truly for those project that projects that only provides supportive services. Anything else, whether, whether it's paid for by HUD or someone else, if your project provides housing, your project will not be an SSO project. Next slide. Okay, so I have a, a quick, like 15 second quiz. So please put this in the chat. and don't worry for those who have questions in the chat, we are actually recording all the questions. So, is participation in MI mandatory true false? Maybe? Ooh, I see a lot of truths and yeses and I see I got a C in there. Alright.

Speaker 5 00:38:48 Okay. Nathaniel was very, was very, thorough on this answer. Okay. So it is, this is kind of a trick question, and I think, and most of you guys got it right, it's, it's true, but also I think, like Nathaniel said, and there's a couple other people who said there's a maybe in there. Next slide. So HMIS is an unduplicated council of individuals and families experiencing homelessness. That's a very basic, this is a basic slide on HMIS. You will have, we will talk about data, I believe in session three or four that will have everything, all things data HMIS. So, this is very basic. So unduplicated counts of individuals and families experiencing homelessness. participation is mandatory except for, and I think some of you guys put in a chat victim. Legal service providers, they have to provide a comparable database.

Speaker 5 00:39:45 So it's not like they're, they're not collecting any date, any data. Is a comparable database that's separate from HMIS, for privacy obviously, and safety reasons. and it has to be operated by HMIS, lead designated by the CoC. and now this component is different from having some HMIS funding and grants. So, you could have, there's a possibility that you could have a grant that's a different component, but have some HMIS funding in there. But when I'm talking, when I say this, HMIS grant must be operated by the HMIS lead. This is what the grant is just designated, to support HMIS, the HMIS system. and then the funds, I did not list them all out here, but you can go to our regs at 578.57 to look at all the eligible costs that HMIS funds can be used for. And it also can be used for, I did want to point out a couple things. It can be used for leasing a structure whereas operated, so you don't have to add

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

leasing or something else. And well, you could add leasing to a HMIS grant to be able to lease a structure where it's operated and then you can, you can apply to other eligible operating costs that, that's associated with leasing. That structure also can be applied to this HMIS grant as well. next slide.

Speaker 5 00:41:16 So on the next few slides, I'll just talk very basic about eligible costs. Next slide. So, I have, and you guys will, and like, like Marlisa, Mar Marlisa said you guys will get a copy of these slides. So, I just listed out an eligible cost by program component. I'll talk about the rural, set aside costs on the next slide. But you can see for joint TH-RRH th for joint is still just leasing. and that's, that's, no, that's similar to the h hm, the c o C program where th is just leasing. It cannot be, rental assistance. And of course, for joint you can have rapid rehousing supportive services, HMIS and project admin. same thing with permanent supportive housing. You can have leasing rental assistance, you can have operating, and you have the list there.

Speaker 5 00:42:09 And SSO, there is a long list of supportive services that are detailed in our, in our interim rule, we get questions on things that are not in our interim rule all the time that we discuss. So please send an email to special CoC NOFO at hud.gov if there's a, if there's a supportive services cost, that you're not sure that you don't see in an interim rule. And it's not, you know, it is, we get a lot of gray area costs. So, if you're not sure, please send us an email. We can discuss and kind of see, if it's eligible or not eligible. supportive services also can be used for the cost of operating a facility that's, that provides supportive services. and I, like I mentioned before, the implementing and maintaining a coordinated entry system. HMIS, as I mentioned on the other page you is, the cost of operating the system. And then DV providers can use the HMIS grant or HMIS funding, for the cost of operating the compare, comparable database. And in general, like I wrote in red, these are the same costs as all other continuum of care programs. So, this is a key thing to note unless we're noted differently in our special NOFO. The same costs that are eligible under CoC are, are eligible under our special NOFO projects. They're considered continuum of care projects. Next slide.

Speaker 5 00:43:45 So these are the rural CoC costs. I briefly mentioned on our last slide because we understand that rural areas often require, unique solutions to unique challenges, you know, as they face housing people. So, projects that are selected for rural funding can use funding for different costs that are normally not eligible under the continuum of care program. So not only can they use it, for the components and the cost that I mentioned earlier, rural costs can be used for rent or utility assistance, capacity building, short term emergency lodging like motels or, or, or hotels. emergency food and clothing repairs and, other, things that are eligible under the federal inventory property programs. And these are costs that should have been requested when you, when, you put in your application. But these were different ones that were eligible. under rule for those projects with rules set aside, if you are, an unsheltered grant not selected for rules set aside, you cannot use funding for these costs. next slide.

Speaker 5 00:45:04 So there are, I just wanted to, mention that this is in our interim rule, but there are some restrictions on combining calls. And this is just a reminder, we, you could only use acquisition, rehab and new construction with, with our rules set aside grants. And just a reminder that they cannot be used for leasing. So, you cannot lease a unit that you also use, hard, what we call hard cause acquisition, rehab, and new construction. We cannot use tenant-based rental assistance and you can't use short- or medium-term rental assistance with acquisition rehab and new construction. You also can't combine in the same unit rental assistance and leasing or rental assistance and operated. So that's just a reminder as you go out about your projects. You may have a project that has rental assistance and other

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

costs that it can't, that, that I say can't be combined in the same unit, but you have to make sure it is, the costs aren't used in the same unit. and like I said, if you're not, if you're not sure, just send us an email. Next slide.

Speaker 5 00:46:08 And so we, for documented eligible calls, we get this question a lot and we have a very standard, generalized answer for this. So, your record keeping requirements at 24 CFR 1 0 3 apply, so please get familiar with those. And then we just tell recipients and sub-recipients to have clear policies and procedures on the method and the frequency of documenting your costs. So, costs are what's included in the project budget. and then you want to, you want to document who reviews and approve expenditures and how they are billed to the grant. Those are the basic things you need to document eligible costs. There are other things that either the c o c or the recipient or sub recipient want to have in place, but we, we do give a lot of leeway to how you design your policies and procedures on documented costs. But it should have those, basic, you know, who reviews and approves and how they're billed for the grant. They should have those basic elements in your policies and procedures. and I think that is the last slide. Next slide. So now I will turn it over to April. She will talk about eligible costs, indirect costs.

Speaker 6 00:47:24 Thank you Ebony. There's a great listing of information there. Now we'll talk about indirect cost. I know it may not be the most enjoyable, favorable side of grant making and, and grant administration, but it can be pretty interesting if you're into numbers and facts and figures. and it can be a little frustrating if you're, you know, an organization that's just figuring out or you've been involved and you're just trying to, to make sure you do things correctly. So, we'll take the next slide here and talk a little bit about direct costs. So direct costs are just that, those are costs that can be directly identified to a particular cost objective within your, your grant, your federal award. So, some examples broadly, are direct salaries, administration, salary, supplies, materials and travel. But when you break it down to the C O C side, that may mean something as direct as rent.

Speaker 6 00:48:28 you know, something that is at an exact, you are paying the rent for a, for a participant. That is something that's direct. It can be tracked if we take the next slide. The next slide talks more about indirect cost. So indirect costs are most of the time broken down into facilities and administration. Those are going to be costs that have been incurred by the grant, for a joint or common objective for your federal grant. You can see here on this screen, we talk about facilities in terms of depreciation on buildings, equipment, capital of improvement, those types of items. administration can be, general administration expenses that are not actually listed, specifically in, in your, in your grant. So, as you can see, your cost in your federal grant is going to be, either direct cost or it's going to be an indirect cost.

Speaker 6 00:49:27 Now, you know, within the CoC program, we have our administrative line, and that confuses folks a little bit because sometimes we talk about it in terms of overhead or, you know, those type of terminologies. But we really should focus our attention in saying, what is my, what are my direct costs within a grant? What are the indirect costs and those administrative costs for us? That 10% cap, that, those are the programmatic costs that snaps, that the c o c program, the e s G program allows specifically for administration. So, think of administrative, not as overhead, not as those types of terminology. Think of it as what does the CoC program allow and is eligible under the CoC regulations. So that, I hope, clears it up a little bit. I get that question quite, quite frequently. Now, even though the administrative cost in the CoC program is directed by regulations, it may also be an indirect cost.

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 6 00:50:27 So what you're, if you have a negotiated indirect cost, rate, with your, with your Cognizant agency, you'll have that parsed out. You'll have it documented in which, which cost goes where. The most important part here is Ebony said, is to make sure that you're documenting that you're using it very consistently, and you can draw that fine red line to that exact cost. So that's a little bit of some of the questions that I get about indirect cost as, as we're, you know, spending this federal funding. Next slide. Now, some folks will get a, an indirect cost rate, or they'll say they'll want to use the de minimus rate. And folks want to think of our rates for the CoC program in terms of just saying, I'm going to take my 17% walked right off the top of my federal grant, not so fast. When you're looking at your indirect cost, or if you're using a de minimus, you're going to use the modified total direct cost.

Speaker 6 00:51:28 That means you're going to take your salaries, your wages, your fringe benefits, material supplies, travel, any of your civil awards, your contract words up to the, to the first 25,000. You're going to look at your grant and understand where are my costs going, how do I use that? And you're going to use the modified total direct cost against your, against your federal grant. So, it's not just taking your grant and saying, 10% can go here, 17% can go there. There's loads of information about the, the, modified total direct cost, and how you calculate, in some of the resources that we have later on in the slide. So, you can be sure this is just an overview, and you should go back and really work with your financial, grouping, your, CFA, whoever you use to direct those, very specific questions.

Speaker 6 00:52:21 Go back and dig in and understand how you should really be looking at your, at your grant funding and your modified total direct costs. I'll take the next slide. So, when we're looking at the indirect cost, you are going to say, of all my federal grants, who gives me the most money? And whoever gives you the most money, that's going to be your cognizant agency. That cognizant agency is who you're going to work with to, implement your unique indirect cost. Alright? So, once you receive that approval to use the rate, that's going to be the rate you use for all your federal grants. All federal agencies must accept that rate because it was approved by your cognizant. So that's the most important thing about talking, about looking at your cognizant agency. I'll take the next slide.

Speaker 6 00:53:17 Next slide. So now there are lots of questions that I received to say, well, HUD, where's a template for where I should create my indirect cost proposal? And I'm going to tell you that there's not a specific template that HUD uses, or any other agency uses, but I can give you a couple of ideas of what to include when you're putting together your, your proposal to HUD if HUD is your cognizant agency. All right? So, most of the time they're going to ask for an organizational profile. That's just going to give a basic organizational structure of how your, how you're set up. You're going to have a cost policy statement, talking about your accounting policies, talking about how you track your expenditures within your general ledger. So much like what Ebony talked about, really being able to understand how does your organization functions financially. You're going to give a statement of allowable cost.

Speaker 6 00:54:14 then you're going to give your indirect cost rate proposal, policies and procedures. So, you're going to outline everything that you're doing in terms of how you're going to use the federal funds in the indirect cost. You're going to also talk about your allocation of salary, your wages. You're going to break down the positions, the functions, the salaries, fringe benefits, all those things. You're going to really be very detailed, about who's doing what and at the rate of how much. All right? Then you're going to talk about, are there any areas within your, within your organization's financial structure that may affect what, what's going on with your rate or how you're going to proceed.

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Again, you'll be talking to your cognizant agency through all of these things. You're going to also list the other federal awards that you receive, within the physical year. You're going to also complete your lobbying certificate and you're going to, complete a certificate of your indirect cost.

Speaker 6 00:55:17 So those are some very broad categories that you're going to want to include when you're putting together an indirect cost rate proposal. Now the interesting thing about putting together a negotiated indirect, negotiated indirect cost rate is that it really does take a lot of time. It is going to be a, a conversation between your, your CEO, your directors, your financials. You're going to really want to dig in. And that takes time. It's going to take a lot of knowledge of finances and how things work. and you, you may want to employ some resources to help you get through the process. It's also going to be going to involve a negotiation. That's why it's called a negotiated indirect cost rate. You're going to negotiate between your cognizant and your organization to come upon a rate that that makes sense for your organization. It's often going to be subject to audit findings.

Speaker 6 00:56:13 and you're going to really require some written policies and procedures. So, once it's approved, you're going to use that rate, until you need to, get, get it renewed and things of that nature. But for sure it is going to take some time. Now, folks may have a question about your de minimis rate. You can, organizations who are eligible can use the 10% de minimis rate. The 10% de minimis rate is kind of based out, it's, it's, it's, it's, it was developed to ease some of the burden of completing a negotiated indirect cost rate. But you still have to use the same type of parameters. You have to be eligible. there are certain thresholds to whether or not you can or can use it. You're still going to use the modified total direct cost calculations. and non-federal entities should really understand what's allowable and have a, an accounting system that can really account for all the details that it takes.

Speaker 6 00:57:22 So those are some common components. Those are some common considerations you want to look at when you're talking about your rates. Alright, quickly, there are some areas that those of us who deal with indirect costs kind of encounter and a lot of it centers around documentation. So, making sure you're keeping your timekeeper, your whatever system you're using to do timekeeping, you want to make sure you have a great system that way. That's a common issue. Inconsistent treatment of specific, cost is another area we don't want to see the double dipping going on. Alright, failure to offset various credits. using a base that is, is not acceptable if you're doing a cost allocation. and failure to really have a, a great organizational system, in understanding how transaction works are some areas where we see common issues. So as a, oh, next slide.

Speaker 6 00:58:26 I'm sorry. We should be on the negotiated indirect cost rate agreement, slide, I'm sorry, going pretty quickly there. So basically, what your negotiated indirect cost rate agreement is, that's where you have worked with your cognizant agency and actually negotiated what that rate actually is. So that rate, once you receive it, is going to have all the information, an outline of what your parameters are and how you're going to treat your, your, your funding. It's also going to show what are you doing with your fringe benefits as either direct or indirect. So that'll be very specific in there only because we want to know which way you're spending your funding. It's going to have terms and conditions, and any other remarks that need to have, you need to have in consideration. Now, if HUD is your Cognizant agency, we'll take the next slide. If HUD is your Cognizant agency and you are looking to develop an indirect cost, rate proposal, or you have questions about your status, which I'm sure some of you all do, please see the link on the slide here, the HUD CPD indirect cost rates, inbox will be able to communicate with you.

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 6 00:59:45 we also know that there may be some recipients on the line now that's awaiting a response. There, we can send the link to you, we can send you the, the email address in the chat. But that is where you're going to send any of your proposals. That is where you're going to ask questions. And it's also going to be where, if you need your rate extended or have questions about extending your rate or timeframes, that is going to be your email box that you're going to use. So, we'll put that in the chat. We'll take the next slide. So, there's lots to be said about indirect cost. lots of questions. There are a ton of resources related to the work that Brett and Ebony have introduced or re reminded you of in this presentation. So, we have this resource slide for you. Once you click on these resources, it's going to lead you to, you know, various pieces of information. But we definitely want to direct your attention to the HUD exchange website where a lot of this information is housed. And with that, I'll turn it over to Melissa Marlisa. Thank you.

Speaker 1 01:00:59 Hi everyone, and thanks for the great questions in the chat. Next slide, please. All right, and I think you can go to one additional slide. Alright, and I think we can go to the next slide. Alright, and just to recap of some of the resources before we get to the Q&A, we have some materials that you can reference for the homeless definition, including the virtual binder, an overview of the criteria, as well as the record keeping requirements, and then record keeping and documentation requirements for homeless status. Then the c o c virtual binder for eligible activities is also a great resource to reference when looking at eligible activities, what you can pay for with C O C funds. And then, of course for indirect costs you can reference part 200 and we have some links there as well as guidance a webinar and also the E C F R, so you can actually see the, the regs themselves. Next slide please. Alright, so please con, continue to add questions into the chat. We wanted to highlight a few, questions that came up a few times and some that can just be a little bit confusing. So, we'll, I'm going to flag some of those to make sure that we're, we're all understanding the re the answers to those Ebony. I'm going to direct this first one to you who has to be, who has to have a disability to, to be able to qualify for permanent supportive housing.

Speaker 5 01:02:58 So for Special NOFO projects that are not, because they're not required to be, to serve as chronically homeless or be dedicated. Plus, you can have anyone in the household who can be, have a disability to qualify. But if you have a chronic, if you have a project that's serving only chronically homeless, persons or dedicated plus project, it had, it has to be the head of household. So, for special NOFO in particular, there's no requirement to be head of household, but if you have, if you're PSH and you are, dedicated plus or serving chronic a hundred percent chronically homeless, it has to be head of household.

Speaker 1 01:03:39 Thank you. Thanks Ebony for drawing that distinction between the different eligibility criteria. One note follow up question for McKenzie Strub Bank, can you please, you asked a question about eligible costs under the SSO Street outreach project. Can you just add a little bit of additional information so that we know what your question is regarding, so we can provide you some additional info on the eligible costs that you are interested in. we had a question that I'm going to direct to you, Brett before, circling back to you April, on some of the indirect cost related questions that we got. but there was a question about the severe service needs requirement for the, the special NOFO Brett, can you speak to the documentation, if any documentation requirements apply for severe service needs?

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 2 01:04:39 Yep. So, we did not require, like, so our eligibility for projects, let me back up a minute, was in the NOFO what we discussed earlier. So, for unsheltered set aside category one and category four, and for rural category one, two, and four, we did not establish eligibility criteria around having severe service needs. Instead, what we said was you had to follow your CoC's plan. So, we did not have documentation requirements for documenting severe service needs. Instead, your CoC might have had some characteristics, which might need to be documented at the project level, in which case you'll want to check in with your CoC and check your CoC's plan. It's also quite possible that your CoC sort of is evaluating for severe service needs through prioritization, and you as a recipient won't have any additional documentation standards. So, HUD doesn't require any, but there may be something locally that's where you're going to want to talk to your CoC.

Speaker 1 01:05:46 Great, thank you. and then Brett, one other question related to homelessness eligibility document and documentation. Can you, there were a lot of questions about third party documentation who can provide it. Can you give just a few examples about what counts as third party documentation, what we're talking about when we say third party?

Speaker 2 01:06:12 So we've actually published several FAQs on this topic on, I can't remember, I saw on head exchange or head.gov. But on our various websites, because we do receive a lot of questions about this, HMIS is third party documentation. So, if you have a record of somebody staying in a shelter or in our street outreach contact, the HMIS record can count as third-party documentation and you don't have to talk to anybody. A referral letter from a shelter provider or from a street outreach worker can count, but we can also count, if someone's living in encampment in an encampment and there, their person sleeping in the neighboring tent says, yeah, they've been sleeping next to me for the next, for the last three weeks. Like that can count as third-party documentation. If there's a business owner who sees somebody sleeping behind their business, that person can count as third-party documentation. Various community members can count as third-party documentation, as can other, other people who work in the community. Often, law enforcement might see somebody, so you can count a law enforcement officer's statement that they saw somebody sleeping in that location can count or a healthcare worker. it's really quite anybody else who isn't that person who can attest to that is where they saw them.

Speaker 1 01:07:41 Okay, sounds great. Thank you. and then there was one other one that I wanted to ask you. What are there supportive services, participation requirements for special NOFO projects for PSH?

Speaker 2 01:08:00 That one's for me. Yes. sure. So, no, because all of the projects funded under this NOFO are required to adopt a housing first approach. None of these projects should be making requirements that program participants participate in supportive service as a condition of entrance or as a condition of staying in the project. However, you as the recipient or the subrecipient, you need to be making services available. You need to be engaging with clients and you need to be tailoring your supportive services to be supportive services that clients need in your project. And you should be making them enticing and having services that they need. So, they'll actually want to take you up on them, but you cannot be requiring participation in supportive services. Great.

Speaker 1 01:08:52 And then before I let you off the hook, is there a limit on the percentage of people in a project who can self-certify their homeless status?

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

Speaker 2 01:09:00 Yep. So, I'm going to answer this. Assuming your project is not dedicated to people experiencing chronic homelessness, the definition there is a little bit different. But if your project isn't dedicated to those experiencing chronic homelessness, then no, there is no limit on the number of people who can self-certify. I will just make, remind folks that right, your orders of priority, except if you're a victim service provider, documenting category four, your orders of priority are third party first, intake worker second and written certification third. So, we want, if you're getting the majority of your clients certifying, that might be okay as long as you're also documenting that you are in fact following those orders of priority. So, when we come out to monitor, we'll want to see that you're following those orders of priority and that's where documenting due diligence can be really helpful. Or having standards around due diligence so that if a lot of your records are self-certification, you can demonstrate yes, but we followed the orders of priority. We tried to call these people, we tried to get it and it just wasn't possible.

Speaker 1 01:10:10 Sounds good. All right. Now I'm going to shift over to more financial related questions. This one is for you Taylor, what's expected in terms of documenting the cost of employee time?

Speaker 4 01:10:27 Yeah, I just briefly wanted to share. I think, you know, we're looking at cross-cutting regulations. When we're looking at time and activities. We're looking at two CFR 200 and those regulations kind of govern how and what kind of documentation we'd like to see at HUD. And that information, is really making sure that you're, you may provide an estimated percentage at the front end, but in the back end you're able to back up all the time and activity that it was actually applied to each grant. There's actually a lot of really good training on this if you were to type in time and activity on Google. and I know our housing counseling office has done a really good one, so I could put that in the chat. There's a lot of nuance to it. It's just making sure that the actual time and activity was eligible, eligible and allowable to the grant that you're, applying it to. And if you have multiple grants, then it can get really messy. So, you really want to put up a, a, a lot of front-end work to make sure the system is compliant.

Speaker 1 01:11:25 Thanks, Taylor. Alright, I'm going to turn, turn things over to April and ask you a few follow ups on indirect on your indirect cost section. Can you speak about the difference between an indirect cost rate and the cap on admin? So, there's a cap on the facilities, is there a cap on the facilities portions, indirect costs, in light of the fact that admin is capped at 10%?

Speaker 6 01:11:58 Right? So, the way to kind of look at it is your, at your admin, budget is what the CoC program allows in terms of eligible, eligible costs. The indirect costs are items that are within your program that can cross over that's that common or joint, tracking of your, of your program. So say if it's printing, okay, you, you're not going to take your printing budget and say, I am only going to, I'm going to cut separate checks for each of the types of things I'm printing in the rental assistance budget line item rental, your supportive services, that's more of like a common and joint cost item. So that is something that would also be seen in your admin budget. So, what you're going to do is you're going to say, all right, I have my admin budget, I know I can use 10%.

Speaker 6 01:12:55 How much of that 10% can I use to reimburse my, my indirect cost? So, you're not going to go above what your 10% admin cap is, but you're going to have to work with your financial group to say, alright, how much should we be charging, to reimburse the indirect costs versus how much should we be charging to use our actual cap? I hope that kind of explains it a lot. I know it gets very, folks



Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

do have a lot of questions in that area and, and that's where that documentation and understanding how you're tracking your cost really comes, comes into play.

Speaker 1 01:13:36 so April, if you have an approved indirect cost rate, does it have to be applied to all federal grants or how does that work?

Speaker 6 01:13:45 So that's a really good question. So, if you have your negotiated indirect cost rate that allows you the ability to use that rate within any of your federal grants, that doesn't mean you have to. We have some recipients that HUD is just a very small slice of the pie and all they're using, their indirect cost rate or they're using their federal funds as just purely direct cost because HUD may not have a very large, you know, pocket. I have folks, within other recipient conversations, it's like, it's really not worth me using the rate against this budget because it kind of just doesn't work for us. We'd rather use it for another. So, the rate gives you the ability to use it, you don't have to use it. The idea is that all federal agencies have to accept what that cognizant, agency, approves of you.

Speaker 1 01:14:46 Can you explain what the HUD indirect cost rates inbox inboxes?

Speaker 6 01:14:51 Alright, so HUD is broken down into many pieces. As you all know, if HUD is your cognizant agency, that really means the Department of Health and Human Services is working with HUD to approve and negotiate those rates. So, when you all are working with the Snaps office, with the CoC and ESG and YHDP programs, which means that we are housing the programmatic side of grant funding and program and policies. There is another portion of HUD that does the work with, the department of Health and Human Services. So that inbox is going to receive questions about rate extensions, about your proposals, about getting those proposals from, u recipients to HHS. So, if you're sending that information to that inbox, that inbox is going to be the one that shuffles it out to hhs.

Speaker 6 01:15:54 So thank you. That is a really good question and I'm glad I'm able to unfold it a little bit because you would think that, you know, snaps handle so much stuff, you would think that oh, it snaps handles are indirect cost rates. We do not, we filter a lot of questions, we provide policy answers to the CoC program, but in terms of actually negotiating that works with Department of Health and Human Services. If you have a, if you have a grant from the Department of Education, they're their own indirect CoC, they're their own cognizant agency. So, you would work with ED to do that, but HUD functions a little differently.

Speaker 1 01:16:34 Great. Alright. I want to just remind everyone again that the sessions are being recorded and we will be posting them on hud.gov the session, the last session recording Q&A or, chat materials. PowerPoint slides are being posted by the end of this week, so please check back to hud.gov for the recording and materials of the first session. And then we will work to post each subsequent session on the same site on hud.gov as soon as they're available. I am going to continue just to check. Let's see, I'm wondering Brett, if you could answer this question as a follow-up to the housing first related question that you answered earlier. worst case scenario, a program participant's not only refusing supportive services but not following the housing stability plan. So, no little to no participation. Is it true that you still cannot terminate the client, or would that be considered a severe enough circumstance that would warrant a formal termination?

Speaker 2 01:17:59 Yeah, so they also aren't, shouldn't be required or can't be required to follow a housing stability plan. That's also a condition to receiving the housing. So, one, you can't do that. And I

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

mean, certainly you can develop housing stability plans, we can walk through during case management like what would be helpful, but you cannot require the following of a housing stability plan as a condition of participating in the program. When you're talking about severe circumstances, we're talking about probably dangerous situations like the threat to staff. We're talking about potentially threat to property if it's a project-based unit. Those are the types of really severe situations we're talking about.

Speaker 1 01:18:45 Thank you. Janet asks if we are going to be going over documenting client assistance and a future webinar, and I will invite any of the panelists to weigh in on that because I can't recall specifically whether or not that's going to be covered. But also, an invitation to just identify any topics that are of like a special, you know, a special concern or confusion that would be helpful for us to cover that we could try to squeeze in to materials coming up.

Speaker 7 01:19:26 Hey, mark, to that question, I would say it would be helpful to actually get more details on what they're looking for. Today's session focus a lot on what your core documentation requirements will be. For instance, about eligibility, about what you're doing in terms of costs. So, this will be the core. I don't know of another session that's currently going to be focused on client assistance. but it's unclear what specific aspect of client assistance we're looking for. So that would be helpful. Clarity,

Speaker 2 01:20:01 Yes.

Speaker 1 01:20:03 All right, I'm going to just pause for one more moment to see if there are any questions that I missed that other panelists want to flag or if there are any other questions that audience members want to add to the chat.

Speaker 7 01:20:25 So Marlisa, I'm going to jump in on the rural cost one. So, the rural costs are new to all of us to be honest. They were first, outlined in the Hearth Act amendment in 2009 and there were some proposed regs around them and that was the last time we saw anything associated with it. So, it's brand new in the sense that they've never been implemented. What does that mean? It means what's in the NOFO are the clear parameters we have, but you may have questions about potentially doing something else, like, like the question about capacity building. the capacity building. We'd love to see CoC's, and recipients take advantage of that. The way I would think about capacity building is how does it facilitate the skills and ability of the organization to accomplish its mission, not about spending money on things that end up being more like direct costs.

Speaker 7 01:21:21 So landlord incentives is not likely eligible. under capacity building though, you can email that to the inbox and we'll, we'll think about it more. but things that are focused on training, again, if you need special skills or trauma-informed care efforts, that's the type of stuff that we would typically see there. Other costs in the rural capacity, section or the rural section, are going to be new to us and we would love for you to test the boundaries on it. The best thing you can do is, is ask and, and we'll work through it with you, because we would like to be able to say yes to all the reasonable costs that are proposed. and we'll let you know if you step, too far out, out of the boundary because we'll also be learning where that boundary is with you. So please test the boundaries though. That's a good thing.

Speaker 1 01:22:11 Thanks William. All right. It looks like we have some additional questions coming in. All right. A question I believe this one would be for Ebony or Brett if we pay for identification

Date: October 11, 2023

Title: 101123-506379-HUD-FY22-WrittenTranscript

documents, employment readiness, application, move-in fees, are there special requirements for documenting? Janice is wondering about logs with client signatures, et cetera,

Speaker 2 01:22:51 But actually Steve Oh you could go, no, also Taylor and Carrie might have something to weigh in on here because they see this most when monitoring. Go ahead Ebony. I didn't mean to cut you off <laugh>.

Speaker 5 01:23:10 No, I just didn't have anything. I just will point back to what I said about them providing their policies and procedures, but I don't have anything specific unless Taylor, does

Speaker 4 01:23:21 I think, you know, receipts, right? So, move in fees. There's some regulations around not providing, more than two months rights of a security deposit. So, we're going to need to be able to verify those things. So just thinking logically about what you would need to put in the file to make sure that you have that backed up. That's the only thing I'd add. Thank

Speaker 1 01:23:47 You. Taylor And Ebony and Brett. Alright, and then I think this may be our last question. I'm going to, I'm going to direct it to you Carrie. Are there requirements for environmental reviews for unit upfits or maybe we need more information about what a unit upfit activity would entail?

Speaker 3 01:24:09 Yeah, I would definitely, are we talking about like a rehab?

Speaker 2 01:24:16 Yeah, I wonder if we're talking about again, that special eligible cost under rural to repair units to bring them up to code so we can rent them.

Speaker 1 01:24:27 So that may be a good candidate for the, okay. A repair to meet inspection.

Speaker 2 01:24:34 Okay. So yeah, it's that rural cost.

Speaker 3 01:24:36 Yeah, and it's going to de also depend on whether it's like a, a maintenance type thing or more of an actual rehab to look at the level of review. There is a great flow chart, and you can just Google c o c flowchart or HUD c o c flowchart where you can follow along in the chart of what your costs are and then it'll lead you right to what level of review and the form for that as well.

Speaker 1 01:25:11 All right.

Speaker 3 01:25:12 Yeah, I guess the answer is it depends.

Speaker 1 01:25:14 Yeah, and the more specifics that you can provide, especially that, you know, that would be great to be able, to give us the information we need to provide you a specific response. So please feel free to use the special NOFO email box. With that, I believe that those are all of our questions, and so this ends our webinar. Please join us next week and until then, have a have a great day. Have a great week. Thanks everybody.