

Chat

Session 4 – Grant Administration and Management

10/25/23

from Terri Drexler to everyone: 1:54 PM

Can you please post the link to the webinar slides ASAP? It helps to have them ahead of the meeting.

from Ebony Rankin to everyone: 1:55 PM

You can find the slides and recordings here:

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

from Cristina Benitez to everyone: 1:55 PM

Hello everyone! Cristina Bentiez Arizona Dept. of Housing -AZ 500- BOS CoC Coordinator.

from Terri Drexler to everyone: 1:56 PM

Thank you, Ebony.

from Peggy Brown to everyone: 1:56 PM

Hello all, Peggy Brown with Union Mission Statesboro GA.

I am having trouble with audio so I left and came back

from Tracie Morgado to everyone: 1:58 PM

Hey Everybody- Tracie Morgado with One80 Place Charleston, SC.

from Sarah Frye to everyone: 2:04 PM

How do I find out who does my local environmental review?

from LM Wolfe Hoadley, she/her to everyone: 2:04 PM

Will there be a requirement for annual assessments of program participants and will this be based on cumulative or consecutive participation?

from Jane Folts to everyone: 2:05 PM

Good Afternoon everyone. Jane Folts Homeless Services Program Manager Connecting Communities Action Salamanca, NY

from Torrie Kopp Mueller to everyone: 2:05 PM

We have an agency that is no longer able to operate the project. They have not signed a grant agreement. Can we work with the field office and the CoC to have a process to select a new provider?

from Shetoya Russell to everyone: 2:05 PM

Shetoya Russell, Program Manager, All Chicago. Good afternoon!

from Brett Esders she/her to everyone: 2:07 PM

@Torrie - I recommend you reach out to your field office and they will reach out to us in SNAPS and we can work through this together

from Susan Barbaro to everyone: 2:07 PM

where do I find the recorded sessions?

from Ebony Rankin to everyone: 2:08 PM

You can find the slides and recordings for all sessions here:

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

from Torrie Kopp Mueller to everyone: 2:08 PM

@Brett- Thanks the local field office figured that would be the process. I figured it didn't hurt to confirm. We are working together. Thank you.

from Tamara Tregoning to everyone: 2:09 PM

Does COC refer to us as the nonprofit or the larger group for our state?

from Brett Esders she/her to everyone: 2:09 PM

The recordings aren't up yet - they take a few days to post, but all of the chats, transcripts, and slides are. And the recordings are coming

from Susan Barbaro to everyone: 2:09 PM

thank you

from Brett Esders she/her to everyone: 2:10 PM

@Tamara - "CoC" is defined in 24 CFR 578.3 and generally refers to the large group of individuals and organizations that are interested in preventing and ending homelessness in your geographic area.

from Tamara Tregoning to everyone: 2:11 PM

@Brett - thank you for the clarification!

from Elizabeth Milks to everyone: 2:11 PM

I was wondering if part of the funding set aside for Supportive Services - specifically Moving Expenses for Storage Units/Moving Vans can be used to secure a yearly Storage Unit that can be used to store donations for clients. Living in a rural area, and having folks who are starting over, we often have donations for house hold goods, but no where to store them until the client is moved in to housing.

Would that be an acceptable use of some of those funds allocated for those costs? Rather than doing a storage unit per family when needed.

from Brett Esders she/her to everyone: 2:15 PM

@Elizabeth - this might be possible. But I recommend submitting a question to SpecialCoCNOFO@hud.gov that contains your grant number and some specifics about your budget line items and what you're trying to pay for. This answer will depend on the funding you are receiving.

from Lada Kloi Gasparac to everyone: 2:18 PM

While we are discussing Supportive Services, is there a specific list of items/services that are permitted under this OR are we to draft a policy (we already have one) on Supportive Services permitted through the grant? This is the first time that we have funding for Supportive Services specifically. Thank you.

from Brett Esders she/her to everyone: 2:19 PM

@Lada - the list of eligible services can be found in Section 578.53 of the CoC Program interim rule. You can read the rule at: <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578>

from Naomi Sweitzer to everyone: 2:20 PM

Thank you Sue!

from Dana Woolfolk to everyone: 2:20 PM

Great job Sue!

from Jessica Bleile to everyone: 2:20 PM

Do we know a timeline of when VAWA forms and information will be updated? I know at the VAWA webinars recently they noted the documents were being updated.

from Axton Nichols to everyone: 2:24 PM

If a landlord who owns an apartment complex currently accepts HUD rental assistance dollars for a single unit, would VAWA protections apply to all the units in the complex? For example, would the landlord have to apply VAWA protections when screening applicants for other units (e.g. not discriminate if someone has an eviction because they had to flee DV)?

from Amiel Cain to everyone: 2:27 PM

Regarding VAWA Protections and Bifurcation, what if the PSH program requires chronicity, and the abuser is the one in the household who met those eligibility criteria?

from Sarah Frye to everyone: 2:28 PM

Are Federally funded tax credit properties (USDA / HUD) already held to VAWA Protections?

from Brett Esders she/her to everyone: 2:31 PM

@Amiel - this is covered at 24 CFR 578.99(j)(ii), which essentially states that in the instance where it is the qualifying member who leaves, the remaining members may continue to receive assistance until the end of the lease term that is in effect

from Tamara Tregoning to everyone: 2:32 PM

How does this apply to non-housing projects? For example our project is providing health and hygiene for unhoused community members.

from Davia Steeley to everyone: 2:34 PM

Is there a particular page on the HUD exchange where we can find the slides?

from Elvira Ramirez to everyone: 2:34 PM

In regards to VAWA does it also prohibited the information be added on HMIS as unidentifiable

from Davia Steeley to everyone: 2:34 PM

For this and past sessions?

from Brett Esders she/her to everyone: 2:34 PM

@Davia - the slides can be found at

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

from Davia Steeley to everyone: 2:36 PM

Thank you!

from Ebony Rankin to everyone: 2:41 PM

24 CFR 578 Interim rule: <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

from LM Wolfe Hoadley, she/her to everyone: 2:43 PM

Does HUD provide model/template forms for income determination?

from Ebony Rankin to everyone: 2:44 PM

HUD Publishes HOTMA Final Rule Preview - HUD Exchange: <https://www.hudexchange.info/news/hud-publishes-hotma-final-rule-preview/>

Housing Opportunity through Modernization Act of 2016:

<https://www.congress.gov/114/plaws/publ201/PLAW-114publ201.pdf>

HUD's website: https://www.hud.gov/program_offices/comm_planning

HUD Exchange: <https://www.hudexchange.info/>

from Victoria to everyone: 2:44 PM

What are the allowable expenses that we should be deducting from gross income?

from Sue Watlov Phillips to everyone: 2:45 PM

In MN our Department Human Services does not count PLEE payments for their expertise. Will HUD follow this example too?

from Susan Kirchoff to everyone: 2:45 PM

Will there be final guidelines created for us to reference?

from Axton Nichols to everyone: 2:45 PM

Do the HOTMA updates change the rules to classify internet as a utility (as it should be)

from Ebony Rankin to everyone: 2:48 PM

<https://www.federalregister.gov/documents/2023/09/18/2023-20130/economic-growth-regulatory-relief-and-consumer-protection-act-implementation-of-national-standards>

from Sue Watlov Phillips to everyone: 2:49 PM

IN MN, we equip PLEE to do HQS inspections. We would like HUD to do this with HCV too to speed up use of our HCV

from Sarah Frye to everyone: 2:49 PM

Do we still need to inspect if we are partnering with PHA and utilizing a Stability Voucher?

from Lauren Frederick to everyone: 2:49 PM

Will there be any upcoming NSPIRE training offered by HUD, TA or certified consultants to CoCs?

from Brett Esders she/her to everyone: 2:50 PM

@Sarah - if you are providing the housing assistance with a Stability Voucher, you will follow the inspection requirements for the Stability Voucher, which I believe (but don't quote me on this) are the NSPIRE standards. And the PHA will likely conduct this inspection

from Brett Esders she/her to everyone: 2:51 PM

@Lauren - we in SNAPS do plan on publishing guidance on the NSPIRE standards and how they apply to both CoC and ESG Program supported housing in the upcoming year

from Brianna Severson to everyone: 2:51 PM

is there a way to get to copy of the slides?

from Brett Esders she/her to everyone: 2:51 PM

@Brianna - the slides can be found at

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

from Axton Nichols to everyone: 2:51 PM

Re VAWA protections: If a landlord who owns an apartment complex currently accepts HUD rental assistance dollars for a single unit, would VAWA protections apply to all the units in the complex? For

example, would the landlord have to apply VAWA protections when screening applicants for other units (e.g. not discriminate if someone has an eviction because they had to flee DV)?

from Nathaniel Meece he/him to everyone: 2:52 PM

Would program income be allowable to cover additional admin costs beyond the 10% admin budget?

from Ebony Rankin to everyone: 2:53 PM

Join Mailing List: <https://www.hudexchange.info/maillinglist/subscribe/>

Bookmark resources: <https://www.hudexchange.info/programs/coc/>

from Brianna Severson to everyone: 2:53 PM

@Brett thank you very much!!

from Tamara Tregoning to everyone: 2:53 PM

We have been told that HUD funds cannot be used to buy soap for our shower program, but this information is saying that even income from the program can't be used to purchase soap?

from Brett Esders she/her to everyone: 2:54 PM

@Nathaniel - yes, you can use program income to pay for eligible administrative costs above the 10% cap applied to funds awarded for project administrative costs

from Brett Esders she/her to everyone: 2:55 PM

@Tamara - if you have been advised that a cost is not an eligible CoC Program cost for using grant funds on, then it would also not be an eligible cost to use program income on.

from Tamara Tregoning to everyone: 2:55 PM

@Brett thank you for the clarification.

from Ebony Rankin to everyone: 2:55 PM

CPD Monitor Handbook:

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

from Nathaniel Meece he/him to everyone: 2:55 PM

@Brett does that also apply to match funds? Can the 25% match be covered through additional in-kind admin costs?

from Brett Esders she/her to everyone: 2:56 PM

@Nathaniel - that is also correct. You can use matching funds to pay for eligible project administrative costs above the 10% cap for awarded project administrative costs.

from Brett Esders she/her to everyone: 2:56 PM

and program income can be counted as match!

from Marlisa Grogan she/her to everyone: 2:58 PM

@Jessica - At this time, HUD does not have a timeline we can share re: the timeline when VAWA forms and info will be updated, but more information is forthcoming. Stay tuned to the HUDexchange and SNAPS listservs for more details on the VAWA forms.

from Jessica Bleile to everyone: 2:58 PM

@Marlisa- thank you!

from Marlisa Grogan she/her to everyone: 3:00 PM

@Susan: Yes. The applicability of HOTMA varies by CPD program. Program-specific guidance, resources, tools, and training to implement the new HOTMA provisions will be posted on HUD's website and the HUD Exchange as they become available.

from Marlisa Grogan she/her to everyone: 3:01 PM

@ Victoria: For now reference the The HUD Occupancy Handbook 1 06/07 Chapter 5: Determining Income and Calculating Rent – Exhibit 5-1: Income Inclusions and Exclusions – 24 CFR 5.609(b). It will provide you a vast amount of information about deductions from gross income.

from Marlisa Grogan she/her to everyone: 3:02 PM

@Axton: Program-specific guidance, resources, tools, and training to implement the new HOTMA provisions will be posted on HUD's website and the HUD Exchange as they become available.

from Amy Thompson to everyone: 3:04 PM

What costs need the comparison review? Is there a threshold amount?

from George Payne to everyone: 3:05 PM

"Eligibility must be documented upon intake." If it takes awhile for CH documentation for example, can we not engagement them for S.O. and other crisis or immediate offer of housing enrollment , while we are conducting due diligence which often takes time? Or else we leave them unsheltered or possible lose contact during that time.

from sarah Helman: 3:06 PM

the continuum of care website says that session 5 is scheduled for November 4. November 4 is a Saturday. Just looking for clarification

from Brett Esders she/her to everyone: 3:07 PM

@Sarah - whoops. that should be November 1. One week from today. we will work on getting that updated

from Ebony Rankin to everyone: 3:09 PM

VAWA: <https://files.hudexchange.info/resources/documents/HMIS-When-to-Use-a-Comparable-Database.pdf>

Trauma-Informed Design: <https://files.hudexchange.info/resources/documents/Trauma-Informed-Design-Quick-Reference-Guide.pdf>

State coalitions against domestic violence: <https://ncadv.org/state-coalitions>

SNAPS' VAWA Webinar series: Materials Posted: "VAWA 2022" Foundations for CoC and ESG Webinar Series - HUD Exchange

from Martha Kenton to everyone: 3:09 PM

How can providers pay for staff training and stay compliant within the regs? What sort of training is covered under Admin? is says "Training on Continuum of Care requirements. Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings."

from Ebony Rankin to everyone: 3:09 PM

<https://www.hudexchange.info/news/vawa-2022-foundations-for-coc-esg-webinar-series/>

from Ebony Rankin to everyone: 3:09 PM

Fair Housing:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/fair-housing-and-equal-access/>

https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview

<https://files.hudexchange.info/resources/documents/Equal-Access-Agency-Assessment-Tool.xlsm>

from Ebony Rankin to everyone: 3:09 PM

Calculating Program Income:

https://www.hud.gov/sites/documents/DOC_35699.PDF

Rent calculations: <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-rent-calculation/overview/>

from Lada Kloi Gasparac to everyone: 3:09 PM

This was asked last week, but I did not see a response. Will the match be reviewed quarterly or at monitoring?

from Ebony Rankin to everyone: 3:10 PM

Standards for Housing: https://www.hud.gov/sites/documents/DOC_35620.PDF

NSPIRE: <https://www.federalregister.gov/documents/2023/09/18/2023-20130/economic-growth-regulatory-relief-and-consumer-protection-act-implementation-of-national-standards>

from Ebony Rankin to everyone: 3:10 PM

Compliance:

CoC Program Start Up Trainings: <https://www.hudexchange.info/trainings/courses/coc-program-start-up-training-webinars-for-fy-2013-funds1/>

CPD Monitoring Exhibits:

https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2

Lead Based Paint Requirements and Training:

https://www.hud.gov/program_offices/healthy_homes/enforcement/lshr

from Elvira Ramirez to everyone: 3:10 PM

Will we be provided with a copy of the PowerPoint.

from Navid Daneshjou to everyone: 3:10 PM

When we pay utilities for our clients, can we pay as one lump sum? Or do we need to break it down into: Water, Electric, Sewer, Gas, administrative fees associated with the utilities, etc.?

from LM Wolfe Hoadley, she/her to everyone: 3:11 PM

Does HUD provide model/template forms for income determination?

from Brett Esders she/her to everyone: 3:11 PM

@Elvira - the powerpoint can be found at:

https://www.hud.gov/program_offices/comm_planning/coc/specialCoCNOFO

from Tamara Tregoning to everyone: 3:11 PM

Can you clarify what funds we can use on non-HUD approved costs?

from Ebony Rankin to everyone: 3:11 PM

When you pull up the slides on the hud.gov website, the links will be active.

from Axton Nichols to everyone: 3:17 PM

Re VAWA: So even if a landlord is already accepting CoC dollars for one person's unit, they could still deny a different person (with CoC funding) due to DV-related eviction (because they haven't accepted CoC funds for the new applicant)?

from Navid Daneshjou to everyone: 3:20 PM

For HUD: When we pay utilities for our clients, can we pay as one lump sum? Or do we need to break it down into: Water, Electric, Sewer, Gas, administrative fees associated with the utilities, etc.?

from Axton Nichols to everyone: 3:22 PM

Does accepting an application fee (paid with CoC dollars) put the landlord on the hook for VAWA protections, or would those protections only kick in if they accept a rental payment (paid by CoC dollars)?

from Brett Esders she/her to everyone: 3:23 PM

@Navid - this depends on how you are paying for the utilities. If you are using operating dollars to pay for the utilities, you would pay for each utility as the bill comes and, in this case, they would be separate. If this is a case where you receive rental assistance, and program participants are required to pay for their own utilities and you are considering that as part of their rent payment, you would follow the requirements in this Notice: <https://www.hudexchange.info/resource/5630/notice-cpd-17-11-determining-program-participant-rent-contribution-in-the-coc-program/>

from Maggie Johnston to everyone: 3:23 PM

Thank you for today's informative presentation!

from Brett Esders she/her to everyone: 3:23 PM

@Navid - if you're paying for it another way, please let us know and we can help you troubleshoot

from Tamara Tregoning to everyone: 3:25 PM

Thanks Tami, HUD is funding our Health and Hygiene program and we need to be able to purchase laundry soap and shampoo but if we can't use program income or HUD funds on this we are at a bit of a loss on how to purchase these needed products.

from LaToya Young to everyone: 3:28 PM

@Axton - the landlord would be required to adhere to VAWA requirements once signed the lease and VAWA lease addendum in which CoC funds are used to pay for leasing the unit.

from Shanae to everyone: 3:28 PM

Do you need reasonableness proof when you use Match funds?

from Brett Esders she/her to everyone: 3:29 PM

@Shanae - yes. Matching funds must follow all of the requirements (except any caps like the 10% cap of project administrative costs) of the CoC Program interim rule and the Special NOFO

from Navid Daneshjou to everyone: 3:30 PM

HUD: We are responsible for the utilities not our clients. When we get the bill, there is a total amount. I just want to know if we need to look into that one bill and break it down into water, electric, etc. I was wondering if we could just pay that one utility bill without separating each utility. I will look at that link you sent and will communicate next week if I have more questions. thank you.

from Axton Nichols to everyone: 3:31 PM

@LaToya: Can you provide an example of when the VAWA protections against discriminating against someone with a DV-related eviction would apply? It seems like a catch-22 situation where the protections would only apply if the landlord accepts the tenant, but they won't accept the tenant due to an eviction (and they don't have to consider the reason for the eviction since they aren't covered by VAWA until the lease is signed).

from Lada Kloj Gasparac to everyone: 3:31 PM

Just so the question is not lost: This was asked last week, but I did not see a response. Will the match be reviewed quarterly or at monitoring?

from R. C. Webber to everyone: 3:31 PM

I would guess that as long as all of the units covered in the bill are used in the funded project, you could have the bill (or the allocated portion) as a single utilities payment. If the bill pays for some project-related and other non-related units, you have a different problem.

from Elvira Ramirez to everyone: 3:32 PM

Under VAWA individuals that are undocumented eligible for housing program

from Navid Daneshjou to everyone: 3:35 PM

HUD: this is utilities for each apartment unit that is in our program. for example, Mr. XYZ lives in a apartment, he has water, electric, etc. once the apartment complex send us a utility bill, can we just pay that or do we need to break down to water and electric, etc?

from Karin Slater CASA7JD to everyone: 3:35 PM

Our grant is for Construction. Do our contractors have to adhere to and prove Davis-Bacon

from William Snow: 3:36 PM

@Lada - for the purposes of reporting, you will only report on match on an annual basis (along with your other financial information).

from Lada Kloi Gasparac to everyone: 3:38 PM

Thank you!

from LaToya Young to everyone: 3:39 PM

@Elvira - Yes, undocumented individuals eligible under CoC program would be eligible for VAWA protections.

from Sarah Frye to everyone: 3:40 PM

Is this question referring to "all bills paid" units? Where the utilities are included in the contract rent?

from Brett Esders she/her to everyone: 3:40 PM

@Karin - per 24 CFR 578.99(h) - the Davis Bacon Act does not apply to the CoC Program

from Adam Schreiber to everyone: 3:40 PM

Just repeating this question: How can providers pay for staff training and stay compliant within the regs? What sort of training is covered under Admin? The Interim Rule says "Training on Continuum of Care requirements. Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings."

from Navid Daneshjou to everyone: 3:40 PM

monthly, and documents is the utility from apartment complex. the apartment complexes use a billing company that outs all utilities on one bill

from Lada Kloi Gasparac to everyone: 3:42 PM

What about Training for participants rather than staff?

from Magi York to everyone: 3:43 PM

Trauma informed approach training

from Magi York to everyone: 3:43 PM

SOAR training

from Lada Kloi Gasparac to everyone: 3:44 PM

That answers my question. Already reviewed. Thank you.

from Susan Kirchoff to everyone: 3:44 PM

Will there be a guideline created?

from LaToya Young to everyone: 3:45 PM

@Axton- Apologies if I was unclear. VAWA prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking.