# HOPWA IDIS Set-Up and Draw Instructions for CARES Act Grants

## Introduction

The purpose of this guidance is to provide instructions to Housing Opportunities for Persons With AIDS (HOPWA) formula and competitive grantees on Integrated Disbursement and Information System (IDIS) set up and draws for funding authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136.

The grant funds provided under the CARES Act are to be used by HOPWA grantees and project sponsors to prevent, prepare for, and respond to the novel coronavirus disease (COVID-19).

### 1. Prerequisites

Prior to following the steps outlined in this document for setting up HOPWA CARES Act projects and activities in IDIS, grantees should have completed the preliminary steps in the prerequisites charts below.

| Prerequisites for All HOPWA Grantees |
|---|
| **A.** All grantees should have already read the Notice CPD-20-05: CARES Act Implementation Instructions and Related Flexibilities for the HOPWA Program. |
| **B.** All grantees should have already joined the HUD Exchange listserv for HOPWA to receive program updates. |
| **C.** All grantees should already be familiar with HOPWA IDIS manual: Using IDIS Online for the HOPWA Program. |
| **D.** All grantees should already be familiar with the HOPWA Ask-A-Question (AAQ) portal for submitting programmatic as well as IDIS questions to receive technical assistance (TA). |

| Prerequisites for HOPWA Formula Grantees |
|---|
| The HOPWA formula grantees should have already submitted Plan information for CARES Act funding through the eCon Planning Suite in IDIS in the form of either an amendment to an existing 2019 or 2020 Annual Action Plan (AAP), or incorporated into a new 2020 Consolidated Plan/AAP.<br><br>Instructions for how to submit the CARES Act Plan information is here with a walk through of the instructions via webinar here.<br><br>*Note: These instructions include setting up IDIS projects as a part of the submission and allow for grantees to use "dummy" data in the naming of the projects if project sponsors have not been identified. Using the instructions below, formula grantees should revisit these projects and confirm the set-up is complete and naming conventions align with these instructions.* |

| Prerequisites for HOPWA Competitive Grantees |
|---|
| Within 15 business days of the publication of the Notice CPD-20-05, each competitive grantee is expected to submit a brief description of planned uses for the supplemental grant funds to the Office of HIV/AIDS Housing (OHH) at HUD headquarters via the HOPWA email address at HOPWA@HUD.gov. Instructions for submitting the descriptive package are outlined in Notice CPD-20-25 with a walk through via webinar here. |

*All grantees should have a signed a grant agreement to accept the supplemental grant funds from U.S. Department of Housing and Urban Development (HUD) prior to moving to the next steps in IDIS set-up. However, grantee using project sponsors have 14 days to execute or amend project sponsor agreements (see step 3 below) and should start work immediately to determine how best to navigate local contracting processes to assign emergency funding from the CARES Act out to project sponsor agreements as quickly as possible.*

## 2. Identifying Grant Numbers

Grant numbers for the CARES Act grants have a new format. The new grant number format includes the letters "HW" for formula grants and "1W" for competitive grants. (Note that in the IDIS system the HOPWA formula grant pathway is referred to as "HOPWA" and the HOPWA competitive grant pathway is referred to as "HOPWA-C".) The "HW" and "1W" are also the new "Source Type" codes for all CARES funds in IDIS. Traditionally, HOPWA and HOPWA-C grant numbers did not include a "Source Type"; however, this designation will support MicroStrategy report updates to isolate CARES Act funding. More information on MicroStrategy report updates will be coming out through the HOPWA listserv as new features are developed and deployed.

**Figure 1. Traditional Grant Number Format**

| *Baltimore* | | STATE | PROGRAM | FISCAL YEAR | F is for FORMULA | GRANTEE |
|---|---|---|---|---|---|---|
| HOPWA | MDH20F001 | MD | H | 20 | F | 001 |
| HOPWA-C | MDH200002 | MD | H | 20 | 0 | 002 |

**Figure 2. New CARES Act Grant Number Format**

| Baltimore | | STATE | PROGRAM | FISCAL YEAR | F is for FORMULA | SOURCE TYPE | GRANTEE |
|---|---|---|---|---|---|---|---|
| HOPWA | MDH20FHW001 | MD | H | 20 | F | HW | 001 |
| HOPWA-C | MDH2001W002 | MD | H | 20 | 0 | 1W | 002 |

**Quick Tip: The MicroStrategy report PR01 is a quick way to export all the HOPWA or HOPWA-C grants in a list.**

## 3. Establishing New or Amending Existing Project Sponsor Agreements

All grantees are expected to execute new or amend existing project sponsor agreements for the supplemental funds within 14 calendar days of execution of the formula or competitive grant agreements. The selection of project sponsors under the HOPWA program is not subject to the procurement requirements of 2 CFR part 200, subpart D (see 24 CFR 574.3). **Grantees using project sponsors should start work immediately (if not already underway) to determine how best to navigate local contracting processes to assign emergency funding from the CARES Act out to project sponsor agreements as quickly as possible.**

Grantees should remember the following when establishing or amending project sponsor agreements:

A.      HOPWA funds -including CARES Act funds- follow the Grant Based Accounting methodology. Regardless of how the local agreements are structured, grantees must be able to trace costs to a specific HOPWA grant.

B.      Project sponsor agreements that are amended to add CARES Act funding to other existing HOPWA funding under one agreement, must clearly outline and track funding, allowable administration caps and allowable costs for each of the grants on the agreement. Traditional formula and competitive HOPWA grants should be tracked separately from HOPWA CARES Act funds.

C.      All agreements and associated invoicing forms should identify the grant number(s) and allowable activities for each grant.

D.      HOPWA CARES Act grants have higher administrative caps: a grantee may use up to 6 percent of its award under the CARES Act for administrative costs, and a project sponsor may use up to 10 percent of its sub-award under the CARES Act for administrative purposes. Expectations for tracking these caps should be spelled out in the agreement and invoicing form instructions.

E.      In IDIS, the projects and activities are set up by funding year and funding source. The CARES Act funding must be drawn down through the projects and activities set up solely for the CARES Act grant's funding.

F.      Grantees should request TA through the HUD Exchange if assistance is needed to confirm agreements and invoicing tools are set up with appropriate detail to track and draw funds at the grant level.

### 4.  Setting Up IDIS Projects

*Note: Formula grantees are required to establish IDIS projects during the development or amendment of the AAP for CARES. These instructions include setting up IDIS projects as a part of the submission and allow for grantees to use "dummy" data in the naming of the projects if project sponsors have not been identified. Many of those instructions will be repeated here and formula grantees should revisit projects created for CARES Act funding and confirm the set-up is complete with any "dummy" projects updated and all projects using the naming conventions outlined in these instructions.*

Both HOPWA formula and competitive grantees must establish projects under the year "2020" for the 2020 CARES Act funding to align with HOPWA Grant Based Accounting rules in IDIS. This means that both formula and competitive grantees must create the appropriate 2020 projects in the IDIS Project module. Formula grantees can then link the 2020 project to the corresponding CARES Act AAP's AP-35 screen.

**Competitive grantees should create new, separate CARES Act 2020 projects: one for the grantee and one for each project sponsor. Formula grantees should review projects created in the AAP to address any pending "dummy projects" so that each project sponsor has a project.**

June 4, 2020

A. Under the Plans/Projects/Activities tab, click on the "Add" link under the Project submenu.

**Figure 3. Add Project Button in IDIS**
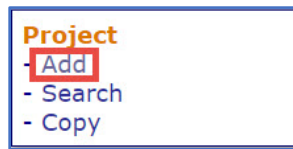


B. The system will display the Add Project screen (see Figure 2).
C. In the Program Year dropdown menu, select "2020".
D. Enter the Project Title adding "CV-COVID-19" to the standard HOPWA naming convention format (e.g., **"CV-COVID-19 2020-2023 City of Baltimore MDH20HWF001 (Balt)"**). *This added level of detail will allow grantees and HUD to easily identify CARES Act projects on IDIS MicroStrategy reports and in the local accounting system where grantees should link the IDIS activity names and numbers to the local accounting codes.*
E. Grantees may also use the HOPWA Naming Convention Tool to generate standardized names for IDIS projects and activities. Link to tool to generate the standard HOPWA IDIS Naming Conventions.
F. Assign a Project Sponsor (if applicable). *Note: IDIS Release 11.20 coming in June 2020, includes updates that will not allow grantees to assign project sponsor administration activities to a project that does not have a sponsor selected. Similarly, grantee administration activities will not be able to be assigned to projects with a project sponsor identified.*
G. Enter project description, providing a high-level summary of all eligible activities that will be funded in response to COVID-19.
H. Complete project set up.

**Figure 4. Add Project Screen in IDIS**



Note: After a formula grantee creates a project and assigns it to an AAP's AP-35 screen additional data fields are required. Instructions for these data fields are included starting on page 9 of the *Setting Up a Substantial Amendment for CARES Act Funding* guide. Formula grantees should provide a budget description of the funding and proposed household count by eligible activity in the project description

boxes labeled: "Estimate the number and type of families that will benefit from the proposed activities" and "Planned Activities".

Repeat the steps above until there is a one project for the grantee and one project for each project sponsor.

### 5. Setting up IDIS Activities

While the CARES Act provides specific eligible HOPWA activities with new flexibilities, it also allows grantees to increase administration cost caps and "maintain operations" for all standard eligible HOPWA activities in response to the COVID-19 crisis. Waivers published by HUD also extend flexibilities to the CARES Act funding.

The CARES Act also allows for other activities to "self-isolate, quarantine, or to provide other coronavirus infection control services as recommended by the Centers for Disease Control and Prevention for household members not living with HIV/AIDS." It is important that the grantee is consistent in how it is allocating costs to HOPWA eligible budget line items and how it is tracking the types of cost being billed.

**Both HOPWA formula and competitive grantees should establish new, separate CARES Act activities for each activity (and each facility) under the corresponding project.**

A. Under the Plans/Projects/Activities tab, click on the "Add" link under the Activity submenu.

**Figure 5. Add Project Button in IDIS**
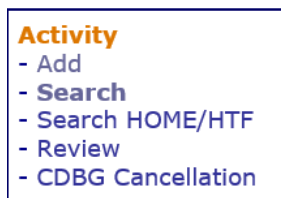


B. The system will display the Add Activity screen (see Figure 4).
C. Select a corresponding IDIS CARES Act project that was previously created (see step 4).
D. Enter the Activity Title adding "CV-COVID-19"to the standard HOPWA naming convention format (e.g., **"CV-COVID-19 2020-2023 TBRA MDH20HWF001 (BALT)"**). *This added level of detail will allow grantees and HUD to easily identify CARES Act projects on IDIS MicroStrategy reports and in the local accounting system where grantees should link the IDIS activity names and numbers to the local accounting codes.*
   a. Grantees may also use the HOPWA Naming Convention Tool to generate standardized names for IDIS projects and activities. Link to tool to generate the standard HOPWA IDIS Naming Conventions.
   b. For CARES Act Administration activities (both Grantee and Project Sponsor) include the new allowable percentage in the name of the activity, to assist in differentiating CARES Act and non-CARES Act administration rules in MicroStrategy reports. See examples below.

E. The appropriate HOPWA or HOPWA-C activity category should be selected. Note all leasing and operating activities including hotel/motel should be assigned to the "Facility-Based Housing Subsidy Assistance" category.
F. The environmental review status must be selected to save the activity.
G. Under Activity Setup Detail all direct service activities for CARES Act should include the Performance Objective **"Prevent, prepare for, and respond to coronavirus"**.

**Examples of HOPWA IDIS Activity Names for CARES Act Funding:**

- CV-COVID-19 2020 - 2023 Grantee <u>6%</u> Admin MDH20FHW001 (Balt)
- CV-COVID-19 2020 - 2023 Project Sponsor <u>10%</u> Admin MDH20FHW001 (Balt)
- CV-COVID-19 2020 - 2023 Resource Identification MDH20FHW001 (Balt)
- CV-COVID-19 2020 - 2023 STRMU MDH20FHW001 (Balt) *This activity should be used for the 24 months of assistance the CARES Act allows.*

**Figure 6. Add Activity Screen in IDIS**



**A note about setting up Hotel / Motel activities in IDIS:**
HUD will need to track funds spent on Hotel / Motel stays to quarantine individuals during the COVID-19 pandemic. Grantees using HOPWA CARES Act funds to cover hotel / motel costs should include the following in the activity set up:

A. Ensure Hotel/Motel is in the activity name:
   Example: *CV-COVID-19 2020 – 2023 <u>Leasing Hotel/Motel</u> MDH20FHW001 (Balt)*
B. Use the correct IDIS Activity Category:
   *Facility-Based Housing Subsidy Assistance*
C. Select correct Environmental Review Status:
   *Exempt*

D.  Activity Setup Detail – Performance Objective:
    *Prevent, prepare for, and respond to coronavirus*
E.  Activity Setup Detail – Facility Type:
    *COVID-19 Response Hotel/Motel*

*(Traditionally, HOPWA grantees have been instructed to select "Project-based rental assistance units or leased units" from the dropdown box for hotel/motel activities. The screens in IDIS and related instructions have been updated for the Activity Category "Facility-Based Housing Subsidy Assistance" to better track this specific cost across the program for CARES Act funds.)*

F.  Activity Setup Detail – Housing Type:
    *Short-term shelter or transitional supportive housing facility/unit*

**Figure 7. Activity Setup Detail Screen for Facility-Based Housing Subsidy Assistance**



## 6.  Making Draws in IDIS

It is important that HOPWA formula and competitive grantees maintain Grant Based Accounting to ensure that all CARES Act funds are invoiced and tracked separately in the local accounting systems and drawn down correctly in IDIS. Many HOPWA grantees will amend existing agreements to commit new CARES funds to existing project sponsors. This will require the grantee to closely track separate grants under a single agreement. Grantees must also track invoices, IDIS activity funding and IDIS vouchers at the grant level. The difference in administration caps between traditional HOPWA grants and CARES grants must be monitored closely by the grantee to ensure compliance. HOPWA grants are three-year grants and the HUD grant agreements indicate that grantees should draw at least quarterly from all active grants. Grantees may expend these supplemental funds more quickly than three years.

IDIS system requirements include setting up separate projects and activities for CARES Act funds, and it is recommended that grantees create separate vouchers (not just separate voucher line items) when drawing funds for existing HOPWA or HOPWA-C grants and CARES Act grants, when making draws for multiple grants in the system at the same time.

## 7.  Selecting the Approximate "Cost Incurred" Date Incurred

New for the CARES Act funding, HOPWA grantees are able to bill for prior COVID-19-related costs regardless of the date on which such costs were incurred. This means costs could be incurred prior to the grant execution or program year start date for some grantees. This new flexibility requires updates in IDIS related to the dates available for the "Approximate Cost Incurred Date" field on the voucher screen. These new updates should be available in the system for CARES Act grants in mid-June 2020 with the IDIS 11.20 Release. If the grantee is vouchering against a CARES Act grant before that time and is not

able to select a sufficiently close approximate date for costs incurred (including if formula grantees are not able to select a date in the corresponding program year of when the costs were incurred), they may [send in a message into the HOPWA AAQ desk](#) with the grantee name, voucher number, voucher line item number and requested cost incurred date. The information will be processed as a batch adjustment to the dates on the voucher list submitted. Based on news reports of COVID-19 and known cases in the United States, HUD anticipates these "cost incurred" dates in IDIS will be after **January 21, 2020** for the CARES Act grants. The June 2020 IDIS release update will allow grantees to include those dates on CARES Act grant draws for COVID-19-related costs.

**Quick Tip: There are MicroStrategy reports that sort vouchers by activity (Report - PR-05) and chronologically by date (Report - PR-07). The HOPWA-specific versions of these reports include more details about the projects and activities, as well as the date of cost incurred and associated performance reporting period.**

### 8. Handling Emergency COVID-19 Response Costs Prior to Access to CARES Act Funding

On April 22, 2020, the Office of HIV/AIDS Housing (OHH) determined that, in order to support housing and service providers as they managed increased needs due to the pandemic, grantees could temporarily use existing HOPWA grants to cover CARES Act activities until the CARES Act funding was available – at which point adjustments would be made. If grantees initially used a prior HOPWA grant to cover COVID-19-related costs and needs to make an adjustment to transfer costs to the CARES Act grants, they should [contact the HOPWA TA providers through the AAQ](#).  OHH will also be conducting targeted reach out to grantees and will walk grantees through a step-by-step process for making these adjustments and keeping appropriate records of the changes made.

Note: The CARES Act and flexibilities in the current and any future HUD waivers and notices on COVID-19 may apply to multiple funding sources. Grantee should be sure to review this information when determining which grant year they plan to use.

Grantees that are using existing HOPWA funds to temporarily cover COVID-19-related costs until the CARES Act funds are available should do the following:

A. [Reach out to the HOPWA TA team through the AAQ portal](#) letting them know the grantee that will be temporarily using this method to respond to emergency need.
B. Establish new activities under the year of funding that will be used to temporarily cover COVID-19 costs. These new activities should follow standard naming conventions but should also include *CARES Act Adjustment* in the title. Reach out through the HOPWA AAQ if you have already made draws prior to establishing an adjustment activity.
C. Track the voucher numbers, voucher line items, amounts to reconcile with CARES Act grants, and a description of the costs.

The HOPWA TA team will be reaching out to grantees that have made draws since the pandemic began to identify who might need assistance with adjustments. When the CARES Act grants are available to draw in IDIS, the grantee should [contact the TA providers through the HOPWA AAQ portal for support](#). The HOPWA TA team will assess each grantee's situation and provide step-by-step guidance for making the necessary adjustments. Grantees are responsible for keeping a clear record for local files and to provide during any future monitoring.

**Quick Tip: For grantees temporarily using prior HOPWA grants to cover CARES Act costs while awaiting access to the funds, detailed tracking of the costs and draw information should be kept on file and grantees should reach out to the HOPWA TA team through the AAQ on next steps.**

### 9. Using Formula Funds that are Set to Cancel for COVID-19 Response

There are some formula grantees grants that are set to cancel at the end of the 2020 and 2021 fiscal years (FY2014 and FY2015 funds). Grantees may choose to initially fund their COVID-19 response using these older at-risk funds for budget line items activities allowed under the HOPWA regulation 24 CFR 574 with applicable waiver flexibilities. By doing this, the grantee would not need to do the adjustment exercise later because the costs would be eligible under the older grants and the grantee could keep the COVID-19-response costs associated with these older funds. This would allow the grantees to use these old funds first that are at highest risk of being swept back to U. S. Dept. Treasury and no longer available to the HOPWA program. Grantees should communicate with their local HUD field office about using canceling funds on COVID-19 response to determine if adjustments to the AAP or spend down plan are needed.

### 10. Reporting

HOPWA reporting requirements are still being determined. It is possible that enhanced reporting may be required to describe how the CARES Act funds were used across the country. At minimum, the grantee should be prepared to capture the level of detail currently needed in the HOPWA performance reports for CARES Act grants. As HUD determines these requirements, grantees should ensure they can track these funds separately in the event separate reporting is needed. Formula grantees that have traditionally reported out across all grants that had activity within a 12-month reporting period, should ensure they are now able to parse out the standard reporting data elements specifically for the CARES Act funding (not comingling with the expenditures and outputs/outcomes from other HOPWA grants). Competitive grantees have traditionally reported on a single grant at a time and should be prepared to continue that practice for the CARES Act. *More on this topic will be coming as HUD finalizes requirements.*

**Quick Tip: HOPWA reporting requirements are still being finalized but may require separate reporting for CARES Act funds. In preparation for any future reporting requirements, HOPWA grantees should ensure their local tracking is robust enough to complete the standard HOPWA APR and CAPER reporting fields for CARES Act funding alone – not comingled with other HOPWA funds. More on this topic will be coming as HUD finalizes requirements.**

### 11. Requesting Help:

HOPWA formula and competitive grantees have been working diligently to respond to the emergency needs in communities across the country. Grantees that need support with program planning, implementation, financial management or reporting can reach out to HOPWA TA providers through the HUD Exchange TA portal to receive answers to policy and system questions and to request more intensive TA engagements. As general updates for IDIS are developed for HOPWA, they will be shared through the HOPWA listserv. Please be sure appropriate grantee staff are receiving these updates.