FY18 Program Manager School

Budget Vulnerability

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Budget Tool Reminders

- **The Budget** tool needs to be revised once any budget revision is made within a Grantee Request.

- **Changes of Key** personnel and FTE percentages needs to be updated within the CBW.

- **Always** check the % columns at the bottom of the prime budget when making budget revisions (does it still meets compliance):
  - Admin less than 10% of lead award
  - Direct Cost and Match Requirements is equal to or more than min required for grant type
    - 65% for LHC / Match Min 10%
    - 80% for LHRD/ Match Min 25%
Budget Narrative Reminders

- The budget narrative provides the details that makes all the allocated cost in the CBW eligible on invoice.
- Great care and detail are needed when developing and changing the budget documents.
- The budget narrative needs to be updated throughout the grant life cycle if any changes are made within a budget revisions request.
- If it isn’t clearly a planned expense in the budget documents; it isn’t eligible for reimbursement.
Discussions ad Examples of Ineligible Lead Grant Costs

- HOME funds
- Tubs
- Outdated LIRA
- None unit related EBL testing
- Non lead hazards within LIRA that is perform within Scope of Work
- Roof Replacement
**Relocations Allowable Costs**

**Common Acceptable Costs for Relocation:**

- Hotel Relocation
- Lead Safe Housing
- Food Stipends
- Moving Service/ Company Allowance (Use only as last resort)

*Note: Record keeping of the costs are vital for file justifications and accurate file management*
Vital Details Invoice Submission

- Administrative costs of times needed to be broken down clearly
- Invoicing Details of Services is Key (when receiving invoicing from contractors, make sure they have a description of services)
- Ensure to collect supporting documentation for invoice review
- Match justification for every line and expense
Required Forms Need for Budget and Program Changes

THERE ARE THREE MAJOR AMENDMENTS:

1. Change in Key Personnel
2. Extension-Period of Performance
3. Budget Change (10% or more of HUD’s share)
TYPES OF AMENDMENTS
Requirements Reminders

- Budget Change of 10% or more of HUD’s share (funding)
  - A letter from the grantee signed by Authorized Official
  - Grantee shall submit a revised HUD-424-CBW (budget) and budget narrative justification
  - Create Grantee Request in HHGMS
  - GTR acceptance/recommendation memorandum
TYPES OF AMENDMENTS
Requirements Reminders

- **Change in Key Personnel**
  - A letter from the grantee signed by Authorized Official
  - Resume(s)
  - HUD-96012
  - Program Manager (75% FTE)
  - A revised HUD-424-CBW (budget) and budget narrative justification *(if needed)*
  - Create HHGMS Request in HHGMS
  - GTR acceptance/recommendation memorandum
TYPES OF AMENDMENTS
Requirements Reminders

- **Extension – Period of Performance**
  - A letter from the grantee signed by Authorized Official
  - Revised HUD-424-CBW and Budget Narrative justification for the extension period only (if needed)
  - All amendment request must go through the GTR.
  - GTR acceptance/recommendation memorandum
  - Extensions may not be granted (Plan accordingly for your grant period to reach benchmarks).
LOCCS Set Up Reminders to Avoid Delays

- A **subgrantee or contractor** can not have access to LOCCS Secure System.
- **Acting or Interim Position** can not be approved as an Approving Official for the LOCCS HUD 27054E form.
- A **personnel** can not be both a User and Approval Official.
- An **Approving Official** position must have higher authority than Users.
Please send all LOCCS forms to the Grant Officer for QC (Do not send it directly to Secure Systems).

A user must needs to be active within 90 days are your account will be terminated effectively 02-05-2018.

Approving Official must certify users quarterly (Please review LOCCS reference for guidance)

Please do not share M numbers in Voucher Payment system when creating a voucher
Detailed instructions for establishing and using the LOCCS and eLOCCS Systems are covered below in the following links:

- **eLOCCS Quick Reference Guide**: Please provide your email and name on informational sheet if you have not received this document.
GETTING HELP

Help desk contact numbers are:

- eLOCCS Support Help Desk - 571-766-2916
- Public and Indian Housing (PIH) Real Estate Assessment Center (REAC) Technical Assistance – 888-245-4860 or REAC_TAC@HUD.GOV
- LOCCS Security Office – 877-705-7504
What Our Side of LOCCS Looks Like and How it Connects to HHGMS

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<tbody>
<tr>
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1= Total Award Amount  
2= Total $ paid to Grantee  
3= Total $ in process of request  
4= Remaining Balance (minus any requests in process)
Grantee Request for Payment Process Steps

1) Understand the OLHCHH Policy
2) Start LOCCS Set Up Process
3) Create Voucher in the eLOCCS System
4) Submit Documentation Requirements in HHGMS
   1) 2 person verification/signature on eloccs form
5) Wait on GTR Review to Process Payment
   - Under $100K
   - Over $100K
   - At GTR Discretion: Can include any documentation needed to verify the draw requested at any time
Voucher Payments Reminders to Avoid Delays

- Don’t wait till the last minute
- LOCCS draws must be turned around timely per the 2 CFR.
  - Must have correct paperwork, signed and no negative balances and include all required pieces.
  - The bigger the draw the longer it takes to review
  - Allow 5-7 business days for GTR review
  - You can count the draw in your benchmarks in the quarter your bank receives the money
  - Make more frequent smaller draws to stay on track
Voucher Payments Recap

Check List

- Request under correct grant award number
- Attach all files needed
- Include invoices to support the draw in full if $100,000 OR if the GTR requests to see them for any reason
- Ensure the Part 3 forms and LOCCS Voucher Payment are filled out completely and accurately with proper signatures
Fiscal Management and Monitoring Checklist Recap

- In order to report and monitoring fiscal management accurately, each program must be able to:
  - Manage elements of the Budget Narrative and CBW throughout the lifecycle of the Grant
  - Understand eligible and ineligible cost principles
  - Collect and provide Fiscal Back up Documentation that correlates to reported summaries clearly when applicable
  - Access Funds in eLOCCS to disburse to staff, subs, and partners
  - Request Funds in eLOCCS and HHGMS
  - Report Summaries Quarterly and Accurately to Avoid Miscalculations of Funds within HHGMS Expenditures
  - Provide cumulative reports in final Closeout Report
  - Good Communication constantly with your finance staff to avoid Budget Vulnerability
Policies’ References

- 2015-01: Clarifications of Costs for LHRD and LBPHC
- 2013-03: Requesting Grant Amendments
- 2010-01: Revised Line of Credit Control System (LOCCS)
- 2012-05: Closeout Procedures for OHHLHC Grantees
- 2012-03: Eligibility of Units Counted as Match
Q&A Sessions