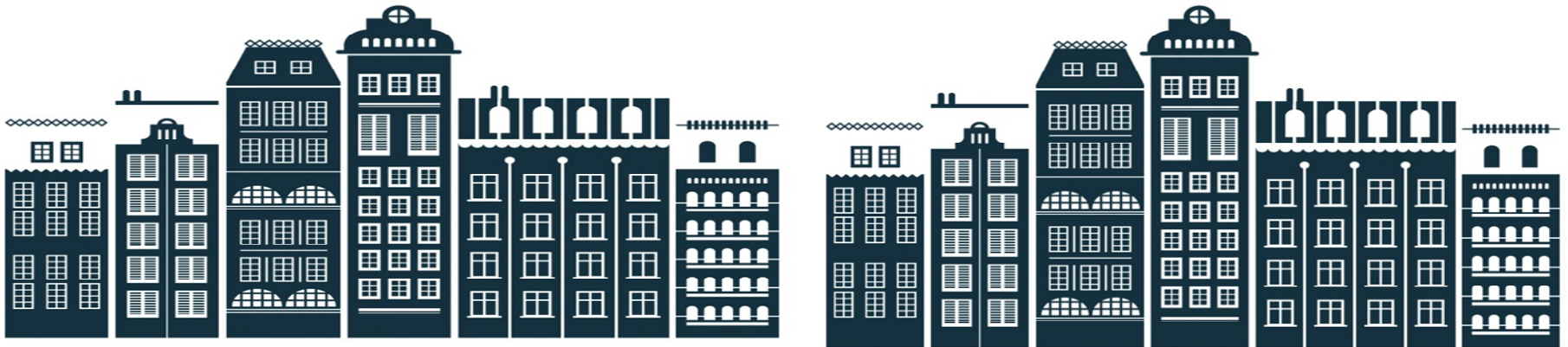


U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

2019 Program Manager School

Grant Administration (Part 2) *Oversight and Monitoring*

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Connecting The Dots on Grant Management

2

File Reporting Management on Allowable and Unallowable Costs

Types of Amendment to Remember and Report

Budget Administration Reminders

Closeout Reporting Management

Q&A Session

Unit Reporting and Management

3

Unit Reporting File Management

Section 1101 (a) of Title X and Policy Guidance 2014-01:

- **50% of rental units** must be occupied or made available to families with incomes at or below **50% AMI**;
- **Remaining #** of rental units must be occupied or made available to families with incomes at or below **80% AMI**;
- **Rental properties with 5 or more** units may have **20%** of its units above **80% AMI**;
- **100% of owner-occupied units** must be occupied by families with less than **80% AMI**

HHGMS Tracking Solution

- Program's Work Plan must include the intent to monitor and evaluate the 50/50/80 requirement
- HHGMS can assist programs with tracking the requirement
- Unit Tab in HHGMS will allow the grantees to track the AMI for the units within a report function
- Remember to complete all information requested in the Unit Tab Section of HHGMS for unit review.

Note: Ineligible unit cost can occur if income verification is not monitored correctly (example provided).

Details on Invoice Submission of Allowable Costs

4

- Administrative costs of times needed to broken down clearly
- Invoicing Details of Services is Key (when receiving invoicing from contractors make sure they have description of services)
- Ensure to collect supporting documentation for invoice review
- Match justification for every line and expense
- Sufficient financial management system to track cost and file invoice data



Note: Record keeping of the costs are vital for file justifications and accurate file management.

Relocations Allowable Costs

5

Common Acceptable Costs for Relocation:

- Hotel Relocation
- Lead Safe Housing
- Food Stipends
- Transportation Stipends (Metro buses and trains)

Examples of Ineligible Disallowable Grant Costs

6

- HOME funds
- Outdated/ Non Compliance LIRA (**No Fair Rating, Poor Rating**)
- None unit related EBL testing (**No outreach bloods testing**)
- Non lead hazards within LIRA and services done in Scope of Work (**NO Intact Items Perform**) – **Please see LIRA policy on more details**
- Roof/ Tub Replacements without a justifiable cost related to **lead-HHS Funding may be applied** (please talk with GTR for justification approval)

Common Types of Amendments and Required Documentation

7

Amendment Change	Reported Documents
<p><i>Change in Key Personnel</i></p>	<ul style="list-style-type: none"> -A letter from the grantee signed by Authorized Official requesting a change in Key Personnel giving the Name, ---Percentage of time and the effective date of the change. -Resume(s) -HUD-96012 – (include the effective date of the key personnel change(s)) -If the change is for the Program Manager, make sure the percentage of time is at least 75% or as otherwise stated in the NOFA -GTR acceptance/recommendation memorandum
<p>Extension – Period of Performance</p>	<ul style="list-style-type: none"> -A letter from the grantee signed by Authorized Official requesting an extension and rationale/justification to substantiate the extension -Revised HUD-424-CBW and Budget Narrative justification for the extension period only (if needed) -GTR acceptance/recommendation memorandum
<p>Budget Change of 10% or more of HUD's share (funding)</p>	<ul style="list-style-type: none"> -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

Budget Narrative and CBW Reminders

8

- **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 budget change** is not within direct/admin minimum requirement ;it isn't eligible for reimbursement

Helpful Reminders

- Admin less than or equal to 10% lead award amount
- Direct Cost and Match Requirements is equal to or more than min required for grant lead award amount:

2014-2017 Grantees

- 65% for LHC Direct Cost (Match Min 10%)
- 80% for LHRD Direct Cost (Match Min 25%)

2018 Grantees Requirements:

- 65% for LHC Direct Cost (Match Min 10%)
- 80% for LHRD Direct Cost (Match Min 10%)
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Closeout Reminders

- **Extension Requests** submitted before POP end date. **(90-Day Letter)**
- **Closeout Reporting Documents** should be submitted within 90 days after POP end date.
- **Check HHGMS Award Page, SF425 and LOCCS** to make sure expenditures and balances are the same and accurate.
- **Make sure unit files are documented properly** and GTR approval has submitted for High Cost Units (please see policy for more details).

Time Frame	Actions
Prior to grant period of performance end date (90 days)	<ul style="list-style-type: none"> • Grantees will be sent grant close out instructions and close out letter from the OHHLHC Grant Officer. • If needed, Grantee submits request for a grant extension to OHHLHC Government Technical Representative (GTR) for consideration.
After grant period of performance - close out period (90 days)	<p>Grantees are required to submit to their GTR:</p> <ul style="list-style-type: none"> • final narrative report (see note below); • final break down and justification of budget categories including direct costs, administrative costs, and in-direct cost rate, if applicable • final Financial Status Report (SF425); • final invoice for incurred expenses; and • final report into the on-line quarterly reporting system (only if additional units were completed and cleared during the close out period) <p>Grantees are required to submit a final Section 3 report (HUD 60002) to your local HUD Field Office at: http://www5.hud.gov:63001/apps/po/e/srs/Public/form.cfm</p>

Q&A Session

10

- What vital Title X unit policy that was discussed and can be tracked and managed within HHGMS?
- What were examples of ineligible costs?
- What were the three types of common Amendments?
- When should you submit your final closeout package documents?



Grant Administration Overview Recap

11

- In order to report and monitor fiscal management accurately, each program must be able to:
 - Understand All Program Eligible and Ineligible Costs
 - Establish a detailed and sufficient Financial System and Unit 50/50/80 AMI Tracking System to monitor and maintain eligible costs
 - Monitor LOCCS requirements on Maintaining Access
 - Request Funds in eLOCCS and HHGMS on a monthly bases if possible
 - Report Summaries Quarterly and with LOCCS request
 - Collect and Provide Fiscal Back up Documentation that correlates to reported summaries clearly when applicable
 - Inform OLHCHH on all Major Administrative Changes within the Program
 - Provide all necessary documentation on Closeout Reporting

Policy References

12

- *2015-02: Updated eLOCCS Procedures*
- *2015-01: Clarifications of Costs for LHRD and LBPHC*
- *2014-01: Eligibility of Units for Assistance*
- *2013-03: Requesting Grant Amendments*
- *2013-01: Lead Inspection Risk-Assessment Reporting and Documentation*
- *2012-05: Closeout Procedures*
- *OLHCHH Policies Link:*
https://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/lbp/pg