

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

# FY18 Program Manager School

Policy Review for 2017



Omaha, NE April 30-May 3, 2018

# Preface

There are many limitations to the money we have as a resource to use:

- statutory, regulatory, federal agency, OLHCHH program and as well as the grantee state and local requirements

Lets review what those are

# Required References

- Title X
- 40 CFR
- 2 CFR 200
- NOFA
- Terms and Conditions\*
- 2012 HUD Guidelines
- Program Policy Guidance's
- Local and State Lead and Procurement Requirements

# Terms and Conditions

- Refer to these often- KEEP THEM ON TOP OF YOUR DESK!!!
  - Change in Key Staff
  - Special Needs of applicants
  - References to regulations and requirements we are going to talk about
  - What we can pay for
  - What are consequences of poor performance
  - Who can work on the grant
  - Reporting requirements

# Policies from 2017 Review

## Review of 2017 Policies

- 2017-01- Lead Dust Standard Policy- NEW
  - [https://www.hud.gov/sites/documents/LEADDUSTLEVELS\\_REV1.PDF](https://www.hud.gov/sites/documents/LEADDUSTLEVELS_REV1.PDF)
- 2017-02- Subrecipient/Contractor Determination Policy- NEW
  - <https://www.hud.gov/sites/documents/PGI2017-02.PDF>
- 2017-03- Zero Bedroom Unit Policy- NEW
  - <https://www.hud.gov/sites/documents/PGI-2017-03.0BEDROOMUNITS.PDF>
- 2017-04- Procurement Policy- NEW
  - <https://www.hud.gov/sites/documents/PGI-2017-04.PDF>
- 2017-05- Income Verification Policy – Policy updated

# Policies cont.

Other Policies to note:

- 2013-01- Lead Inspection Risk Assessment Policy
  - [https://www.hud.gov/sites/documents/PGI\\_2013-01.PDF](https://www.hud.gov/sites/documents/PGI_2013-01.PDF)
- 2014-01 Unit Eligibility Policy
  - [https://www.hud.gov/sites/documents/2014-01\\_UNIT\\_ELIGIBILITY.PDF](https://www.hud.gov/sites/documents/2014-01_UNIT_ELIGIBILITY.PDF)
- 2013-03 Grant Amendment Policy
  - [https://www.hud.gov/sites/documents/PGI\\_2013-03.PDF](https://www.hud.gov/sites/documents/PGI_2013-03.PDF)
- 2015-01 Cost Classification Policy
  - [https://www.hud.gov/sites/documents/2015-01\\_COST\\_CATEGORIES.PDF](https://www.hud.gov/sites/documents/2015-01_COST_CATEGORIES.PDF)

# Lead In Dust

2017-01 Lead In Dust

- Current issues?
- Incorporate into work plans
- Ensure you have supporting documentation that you are following this standard
- Waiving of penalties for failed clearance should no longer be needed for veteran contractors related to the new standard
- Resources – Lead Dust Policy Checklist
- FAQ Sheet

# Subrecipient/Contractor Determination

2017-02 Subrecipient/Contractor Determination Policy

- Checklist-Details to remember
- HHGMS NOTES
- Supporting Documentation- Chart
- Impact to production
- Resources: Webinar Training Online, FAQ, Procurement Chart



# Zero Bedroom Units

## 2017-03 Zero Bedroom Unit Policy

- When can these be done
  - ACTUAL KNOWLEDGE!
  - NO Visiting Children
- Documentation required in each unit file
- When in doubt confirm with your GTR that the units you are considering qualify

# Procurement

## 2017-04 Procurement Policy

- Identifying the type of procurement you are using
- Documenting that you have followed what is required for that type
- Local P and P requirements
- Resources: Documentation Table

Procurement Type Reference OLVCHH Policy 2017-04 Procurement Types  <i>GRANTEE MUST SUBMIT THESE DOCUMENTS RELATED TO THE PROCUREMENT TYPE USED</i>	Blanket Purchase Agreement (BPA) Small (Threshold is 150,000)	Blanket Purchase Agreement (BPA) Large (Threshold is above 150,000)	Small Purchase Procedures (Threshold is 150,000 total or less)	Sealed Bids	Competitive Proposals	Non- Competitive Proposals/ Sole Source
Local Procurement Policy (if not already on file)						✓
Invitation for Bids		✓		✓		
Request for Quotes (RFQ)	✓		✓		✓	
Request for Proposals (RFP)		✓		✓	✓	
Evaluation Method	✓	✓	✓	✓	✓	
Selection Criteria	✓	✓	✓	✓	✓	
Bid Sheet Summary	✓	✓	✓	✓	✓	
Draft or actual Contract/Agreement with Award Amounts	Overall BPA Scope and Limitations of use	✓	✓	✓	✓	✓

# Income Verification Policy- Update

2017-05

Changes made:

- Defining the acceptable income verification documents for units enrolled in the Housing Choice Voucher program funded by HUD's Office of Public and Indian Housing.
- Describing the process by which Lead Hazard Control grantees should reach out to public housing agencies to facilitate enrollment in their grant program of families enrolled in the housing choice voucher program.

Choose a Definition of Annual Income:

- Annual income as defined in 24 CFR 5.609, referred to as "Part 5 annual income";
- Annual income as reported under the Census Long Form for the most recent decennial census; and
- Adjusted gross income" as defined for reporting purposes under the IRS Form 1040 long form (not IRS Forms 1040A or 1040EZ themselves that were submitted to IRS).

Verifying Income:

- You must collect source documentation and ensure that this documentation is sufficient for HUD to monitor program compliance.
- Verification methods may not be altered to suit specific circumstances or applicants.
- The income verification methods should be included in your approved work plan.

Edward M. Augustus, Jr.  
City Manager

Michael E. Traynor  
Acting Chief Development Officer  
Executive Office of Economic Development



Worcester Lead and Healthy Homes  
HUD Lead Hazard Reduction Demonstration Program  
**Request for Release of Tenant Information**

Andrew Taylor  
Assistant Chief Development Officer

Date \_\_\_\_\_

Tenant Name \_\_\_\_\_

Address \_\_\_\_\_ Worcester, MA

Zip \_\_\_\_\_ Phone \_\_\_\_\_ Email \_\_\_\_\_

I/We \_\_\_\_\_  
\_\_\_\_\_ tenant(s) of \_\_\_\_\_ (Address), Unit # \_\_\_\_\_, Worcester, MA have  
been informed that our landlord \_\_\_\_\_ has applied to the City of Worcester's  
Lead & Healthy Homes Program for deleading work to be completed in my unit. As part of the  
qualification for my unit, my income must be verified to be at or below 50% of the area median income.  
As approved by HUD Office of Lead Hazard Control and Healthy Homes Lead-Based Paint Hazard  
Control (LHC) and Lead Hazard Reduction Demonstration (LHRD) Policy Guidance 2017-05, the  
grantee lead program may verify the tenant income through securely obtaining the tenant's HUD-50058  
form or by a written income eligibility notification on PHA letterhead.

The City of Worcester Lead & Healthy Homes Program will securely hold my information as required by  
law and will not provide or distribute this information without my expressed written consent.

I certify under penalty of law that the information contained in this declaration is true, accurate and  
complete to the best of my knowledge. I understand that there are significant penalties for submitting  
false information, including the possibility of fines and imprisonment for knowing violations.

I respectfully request that Worcester Housing Authority release form HUD-50058 or provide a written  
income eligibility statement on letterhead for the express purpose of income qualifying for the City of  
Worcester Lead and Healthy Homes grant. Please send this information to:

Tim Hansen  
Lead & Healthy Homes Program  
City of Worcester  
455 Main St 4<sup>th</sup> Floor  
Worcester, MA 01608  
[thansen@worcesterma.gov](mailto:thansen@worcesterma.gov) (508) 799-1400 x 31430

# Lead Inspection Risk Assessment

## 2013-01 Lead Inspection Risk Assessment

- Cannot pay for intact lead paint !!!! (2d)
- Each and every unit must have a lead inspection risk assessment (1d)
- IF removing and replacing more than five windows per unit you must have an XRF reading of each window (2b)
- Risk Assessment expire in 12 months (8)
- If incomplete- no soil, no dust samples, incomplete testing of room equivalents, components- May not be eligible for payment!! (9)

# Unit Eligibility

2014-01 Unit Eligibility Policy

Encourage someone go to the session tomorrow lots more details!!

Pre 1978

Privately Owned

Lead Hazards Present

Low Income 80% AMI or lower

Occupied by children under 6 or pregnant women

\*\*\*\*\*Prioritize EBL first

How are you doing that?

# Cost Classification

## 2015-01 Cost Classification Policy

- Most common policy that folks don't read
- Most common policy that folks don't apply correctly to their budget
- We have training available online
- Highlights:
  - All indirect is counted as admin
  - There is admin inherent in each line of your budget or at least possibly there
  - HHS amounts do not give you a bigger admin budget
  - The nature of what staff do towards the grant contributes to how their time on the salary line is counted towards admin and direct
  - We don't currently track "other direct" in the budget book



# Grant Ammendments

## 2015-01 Grant Amendment Policy

- Details out multiple different amendments and how to request them
- Key items:
  - USE HHGMS as this is an official request or act on your award
  - COMMUNICATE TIMELY when any changes occur!

Amendment Type	Required Procedures
<b>Change in Authorizing Official</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead outlining the request and include specific details and a brief summary of the reason for the change</li> </ul> <p><i>For this type of amendment, you will receive a modified grant agreement (form HUD-1044) from HUD.</i></p>
<b>Change in Budget</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request and a brief summary of the reason the change is needed as well as the anticipated impact on your grant program</li> <li>All budget changes need to be submitted to your GTR for review and approval. This will ensure that quarterly and final reporting numbers are accurate. Budget revisions greater than 10% of the Federal grant amount will need approval of both your GTR and GO</li> <li>Submit a revised budget form HUD-424-CBW (submit both the original budget and the revised budget)</li> <li>Submit a revised budget narrative and justification for the revision</li> <li>Submit a revised Part 3 budget form</li> </ul> <p><b>Change to Match commitments:</b></p> <ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request and a brief summary of the reason the change is needed as well as the anticipated impact on your grant program</li> <li>Letters of commitment, MOUs or other documentation will need to be provided to document the match commitment</li> </ul> <p><b>Note:</b> Reduced match commitments may result in a reduction in your Federal grant award amount.</p> <p><i>For this type of amendment, you will receive a modified grant agreement (form HUD-1044) from HUD.</i></p>
<b>Change in Key Personnel</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request and a brief summary of the reason the change is needed</li> <li>Include resumes of the new individual(s)</li> <li>Include percentage of time and key responsibilities</li> <li>Include an updated organization chart</li> </ul> <p><b>Note:</b> If there is a change in financial staff, and that person is in charge of LOCCS requests, please make sure that new LOCCS forms are submitted.</p> <p><i>For this type of amendment, you will receive a modified grant agreement (form HUD-1044) from HUD.</i></p>

<b>Change in Period of Performance</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request including detailed justification for the change; the anticipated impacts on staffing, budget and unit production; and the length of the extension (including dates)</li> </ul> <p><i>For this type of amendment, you will receive a modified grant agreement (form HUD-1044) from HUD.</i></p>
<b>Change in Work Plan or Benchmarks</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request and a brief summary of the reason the change is needed</li> </ul>
<b>Changes to Target Area</b>	<ul style="list-style-type: none"> <li>Request to HUD on official letterhead signed by the Authorized Official requesting the amendment and including specific details of your request and a brief summary of the reason the change is needed</li> <li>Documentation to support the need for the revision of the target area</li> <li>Documentation to support your agency has jurisdiction over the new target area</li> </ul> <p><b>Note:</b> Additional Environmental Review will need to be completed if the area was not included in the initial approval.</p>
<b>Other Significant Changes</b>	<ul style="list-style-type: none"> <li>Change in Prime Recipient(s) or other Sub – Recipient(s) and/or their budgets, work plans or other administrative changes (see below)</li> </ul>
<b>Administrative Changes</b>	<ul style="list-style-type: none"> <li>Change in grantee address, phone number</li> </ul> <p><i>For this type of amendment, you will receive a modified grant agreement (form HUD-1044) from HUD.</i></p>

# Questions and Suggestions

- These are just the highlights
- You are responsible for the whole list of regulations and guidelines and policies
- Program Policy Guidance's can be helpful but they also can be limiting and they are not the answer for everything
- If you could change any policy or add new ones what would they be?
  - What issues need to be covered
  - What details needs to amended
  - What process could be more clear