



Grant Award Package Training for FY 2022
Supplemental Comprehensive Housing Counseling
NOFO Awardees

HUD Office of Housing Counseling

June 27, 2023

Webinar Materials and Playback

- Handouts were sent out by email prior to webinar. They are also available in the webinar control panel. Just click on document name to download and save to your computer.
- An [archive version of this presentation](#) will be available in our webinar archive in 7-10 days.

How to Ask Questions

- Please submit your text questions and comments using the Chat box. We will answer some of them during the webinar.
- You can also send questions and comments to: housing.counseling@hud.gov with the webinar topic in the subject line.

Introduction

Melissa Noe

Housing Program Specialist

Office of Policy and Grant Administration

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Today's Presenters

Introduction: Melissa Noe

Grant Execution Process: Rebecca Mullaley

Grant Agreement:

- Articles III, IV, and V: Shelena Hawkins
- Article IX: Elizabeth Dunn
- Articles X, XI, and XIV: Dita McCarthy

Award Overview

- \$14.4 million awarded on June 21 to 12 Supplemental grantees and 170 returning FY 2021 grantees
 - This includes \$3 million awarded to 16 grantees participating in the Minority Serving Institutions (MSI) initiative
- October 01, 2022 - September 30, 2023
- The MSI Initiative will be offered in the FY 2023 CHC NOFO
- Grant execution documents due on Friday, July 14.

Grant Execution Process

Rebecca Mullaley

Housing Program Specialist

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Grant Package Checklist

- Along with your grant agreement, you received this 2-page checklist.
- Your agency will not have access to grant funds until all required grant execution documents are returned and approved.
- Ask your HUD Point of Contact (POC) for an extension if needed.

FY 2022 Supplemental Comprehensive Housing Counseling Grant Award Package Checklist

- ✓ This is a checklist of required documents Grantees must submit to execute the FY 2022 grant awards. See enclosed grant agreement for detailed requirements of each item.
- ✓ All documents must be returned to the assigned Point of Contact (POC) within 15 business days of the date of the enclosed award letter. An incomplete package will delay the ability to access grant funding.

Form HUD-1044 and Grant Agreement Signature Page

- HUD-1044 signed and dated
- Grant Agreement signature page signed and dated

Indirect Cost Rate Documentation

- Copy of Grantee's Negotiated Indirect Cost Rate Agreement (NICRA), **OR**
- Statement that Grantee elects to charge a de minimis rate of 10% of modified total direct costs in accordance with 2 C.F.R. Part 200.414, **OR**
- Statement that Grantee will not seek reimbursement for indirect costs

Financial Management Systems

- Certification from the executive director or other qualified professional that the organization's financial management systems satisfy the requirements in 2 C.F.R. §200.302

Audit

- A copy of Grantee's most recent audit of financial activities (e.g. single or program-specific audit required under 2 C.F.R. Part 200.501) with completed audit no earlier than fiscal year 2019, **OR**
- A copy of the most recent independent financial audit, no earlier than fiscal year 2019, for Grantees that did not expend \$750,000 or more in Federal awards

Code of Conduct

- Verify your Code of Conduct is listed on [HUD's Code of Conduct website](#), **OR**
- Submit your Code of Conduct

Projected Budget

- A budget listing all proposed expenses under the Grant. See Article IV of the Grant Agreement for detailed requirements. The budget may be submitted in the format of the Grantee's choosing. If using form HUD-424 CB, entries relevant to the Grant must be made in column 1, "HUD Share." If there are "other direct costs" on line item h, Grantee must provide a breakdown of those costs on a separate page.
- Grantees seeking to use a fixed-fee methodology (reimbursement per activity rather than itemizing salaries and other direct costs) must submit documentation supporting the fixed-fee proposal and ensuring that the rate does not exceed the actual cost of providing the housing counseling services.

Form HUD-1044 Grant Agreement Signature

- The [HUD-1044](#) is the official government form that shows the agency's grant amount, grant number, and point of contact at HUD.
- Sign, date, scan, and return to HUD:
 - The final page of the grant agreement. (Please don't send back the entire grant agreement)
 - 1 copy of the HUD-1044 with block 19 completed
- Keep your hard copies of the executed grant package for your records.

Indirect Cost Rate Documentation

There are three options for indirect cost rate documentation:

- Copy of your [Negotiated Indirect Cost Rate Agreement \(NICRA\)](#)
- Statement that you elect to charge a “de minimis” rate of 10% of the modified total indirect costs in accordance with [2 CFR 200.414](#)
- Statement that you will not seek reimbursement for indirect costs

Financial Management Systems (FMS)

- Provide documentation (a certification from the executive director or other qualified professional) demonstrating that the organization's FMS satisfy the requirements in regulations at: [2 CFR 200.302](#)
- FMS must identify:
 - All federal awards received and expended
 - Source and application of funds, including comparison of expenditures with budget amounts for each award
 - Accurate and complete disclosure of financial results of each award
 - Effective control and accountability over funds, property, and other assets

Audit

Agencies that expend more than \$750,000 in Federal funds

- Provide the agency's single or program-specific audit

Agencies not required to complete a single or program-specific audit (under [2 CFR 200.501](#))

- Provide the most recent independent financial audit

Agencies who do not have an audit or who are not required to have an audit

- HUD will provide a financial review at HUD's expense; contact your HUD Point of Contact (POC) for information

Code of Conduct

- Submit a written code of conduct that meets the requirements outlined in the award letter, if;
 - Your agency is not listed on the [HUD Code of Conduct \(CoC\) for HUD Grant Programs website](#), or;
 - Your CoC has changed since the last time you submitted it to HUD
- If your agency is listed on the website above, and your CoC has not changed, you do not need to submit a CoC.

Projected Budget (1 of 2)

The budget must account for how every dollar being billed to the grant will be spent.

- Projected budget for grantee and each subgrantee itemizing all proposed expenses under the grant and budget narrative, if necessary.
- Budget may include salaries, fringe and other employment benefits, travel, training, marketing, outreach, cost of managing a network, HUD housing counselor certification exam fees, and indirect costs, as applicable.

Projected Budget (2 of 2)

- Initial budget must be approved by your HUD POC prior to any expenditures.
- Proposed amendment(s) to projected budget permitted at any time during the period of performance. Any changes must be approved by the HUD POC prior to any expenditures.
- Fixed-fee methodology: You must seek prior approval from their HUD POC.
- See Article IV of the grant agreement for detailed requirements.

Projections for Housing Counseling Grant Activities (1 of 2)

- You must submit the [HUD-9902](#) projections through the [Housing Counseling System \(HCS\)](#).
- Enter projections under the “HUD-9902” menu item and select projections for NOFA 2022-1.
- Click the “Submit to HUD” button, then notify your HUD POC for review and approval.
- For step-by-step instructions, refer to:
 - Archived: [Webinar HUD Client Projections in HCS](#)
 - [HCS Improvement Release v.14.1.0.0 - December 2014](#)

Projections for Housing Counseling Grant Activities

(2 of 2)

Where to Enter Projections in HCS:

	Fiscal Year 2022: 10/01/2021 - 09/30/2022	Fiscal Year 2023: 10/01/2022 - 09/30/2023	Total
Save As Draft Submit To HUD Return To Budget Allocation			
* Comment required			
8. Households Receiving Education Services (Including Online Education), by Purpose			
a. Completed financial literacy workshop, including home affordability, budgeting and understanding use of credit	<input type="text" value="0"/>	<input type="text" value="0"/>	0
b. Completed predatory lending, loan scam or other fraud prevention workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
c. Completed fair housing workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
d. Completed homelessness prevention workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
e. Completed rental workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
f. Completed pre-purchase homebuyer education workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
g. Completed non-delinquency post-purchase workshop, including home maintenance and/or financial management for homeowners	<input type="text" value="0"/>	<input type="text" value="0"/>	0
h. Completed resolving or preventing mortgage delinquency workshop	<input type="text" value="0"/>	<input type="text" value="0"/>	0
i. Completed disaster preparedness assistance workshop - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
j. Completed disaster recovery assistance workshop - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
Section 8 Total:	0	0	0
9. Households Receiving One-on-One Counseling by Purpose			
a. Homeless Assistance	<input type="text" value="0"/>	<input type="text" value="0"/>	0
b. Rental Topics	<input type="text" value="0"/>	<input type="text" value="0"/>	0
c. Prepurchase/Homebuying	<input type="text" value="0"/>	<input type="text" value="0"/>	0
d. Non-Delinquency Post-Purchase - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
e. Reverse Mortgage	<input type="text" value="0"/>	<input type="text" value="0"/>	0
f. Resolving or Preventing Forward Mortgage Delinquency or Default - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
g. Resolving or Preventing Reverse Mortgage Delinquency or Default - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
h. Disaster Preparedness Assistance - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
i. Disaster Recovery Assistance - FY 2022	<input type="text" value="0"/>	<input type="text" value="0"/>	0
Section 9 Total:	0	0	0
Sections 8 & 9 Total:	0	0	0

Entering Budget and Sub-Allocation List MSOs, SHFAs, and Intermediaries (1 of 2)

- Complete in HCS under the budget allocation screen:
 - General Allocation Guide: [HCS Improvement Release v.13.0.0.0 July 2013](#)
 - Allocation across Fiscal Years (Slides 28-41) [HCS Improvement Release v.14.12.0.0 - September 2017](#)
- Enter list of subgrantees and funded branches, and their corresponding award amount sub-allocations.

Client Management System (CMS)

- You must certify that they utilize a CMS approved to interface with HUD systems (See [list of approved CMS](#)).
- Intermediaries, Multi State Organizations (MSO), and State Housing Finance Agencies (SHFA) must list their subgrantees and the CMS they use.

Articles III, IV and V

Shelena Hawkins

Housing Program Specialist

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Article III: Period of Performance

- Begins: October 01, 2022
- Ends: September 30, 2023
- NEW for the FY 2022 Grant: If an applicant indicated on their HUD-9906 form that program costs would be incurred prior to award, reimbursements may be requested for costs incurred no earlier than April 01, 2022.
- An extension of the performance period must be requested in writing no later than September 20, 2023.
- Only HUD is authorized to grant an extension.

Article IV: Projected Services and Budget

- The housing counseling services listed in the grantee's approved HUD housing counseling work plan represent the scope of services under this grant.
- During grant execution, the submitted 9902 projections will be checked against the agency's work plan.
- When there is a change in staff or management responsible for the grantee's housing counseling program, the grantee must notify its HUD POC in writing within 15 days of the change.

Article IV: Projected Services and Budget (1 of 2)

- Grantee must receive approval from the HUD POC before implementing changes in projected services and budget proposed in its application.
- Budget must itemize all proposed expense categories:
 - Salaries, fringe, benefits
 - Travel and training
 - Marketing and outreach
 - Cost of managing network
 - Counselor certification exam fees
 - Indicate indirect cost rate

Article IV: Projected Services and Budget (2 of 2)

- Fixed-fee methodology:
 - Must seek approval from HUD POC
- Eligible Activities:
 - Housing counseling and group education
 - Oversight, compliance and quality control
 - Supervision of housing counseling staff
 - Housing counselor training and certification
 - Marketing and outreach

Article V: Subcontract General Prohibition Against Subcontracting

It is not permissible to contract out housing counseling services, except as specified in [24 CFR 214.103\(i\)](#). If this exception to the general prohibition applies, grantee shall comply with [2 C.F.R. 200](#) and all other requirements. Exceptions apply if subgrant:

- Sub-grant, etc. was described in approved NOFO application and funded in grant or otherwise approved by HUD.
- Sub-grant, etc. is for web-based education.
- Sub-grant, etc. is for the purchase of supplies, materials, etc.

Article V: Subcontracts and Requirements for Subgrants (1 of 3)

- Eligible subgrantees/branches: Grantees making subgrants must ensure that their subgrantee's quality of services meets or exceeds the standards for HUD approved Local Housing Counseling Agencies.
- Changes to network composition: Submit written request to HUD to amend subgrantee or branch list or corresponding subgrant amounts.

Article V: Subcontracts and Requirements for Subgrants (2 of 3)

- Funding agreements: Grantee shall execute a written subgrant agreement with each subgrantee before disbursing funds. Copies of all subgrant agreements must be maintained and made available to HUD.
- Responsibility for grant administration: Grantee is responsible for managing the daily operations of its program and agrees to accept responsibility for its subgrantees' compliance with the applicable provisions of the grant agreement. Grantee must monitor the performance of its subgrantees and take appropriate action to resolve problems to ensure compliance.

Article V: Subcontracts and Requirements for Subgrants (3 of 3)

- Subgrants to affiliates and allocation of funds to branches:
 - Grantee must maintain copies of all subgrant agreements and a written record on how it distributed funds to its subgrantees. Grantees must list their subgrantee's and branches. corresponding sub-allocations in HCS.
- Documentation of funding decisions:
 - If a Grantee awards subgrants competitively, it must document its process and notify the public (if applicable).

Article IX

Elizabeth Dunn

Housing Program Specialist

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Article IX: Cost (1 of 4)

Prior approval for revisions to work plan and budget: HUD may require prior approval for deviations from the grantee's projected services and budget.

- See [2 C.F.R. 200.308](#)

Allowable costs: Reimbursement is based on actual expenses and must be:

- Allowable
- Allocable
- Reasonable
- See eligible activities in Article IV of the grant agreement

Article IX: Cost (2 of 4)

Indirect cost rates:

- 10% de minimis or;
- Approved NICRA

Direct grantees:

- If grantee has a NICRA, must provide documentation from cognizant agency showing the approved rate
- Those without a valid NICRA can elect 10% de minimis

Subgrantees:

- Can not use parent agency NICRA
- 10% de minimis option, but Intermediary, Multi-State Organizations (MSO), or State Housing Finance Agencies (SHFA) direct grantee cannot require de minimis when a subgrantee has a NICRA

Article IX: Cost (3 of 4)

Period of Performance:

- Costs must be incurred within the period of performance, unless an extension is granted.

Multiple sources of funding:

- HUD will not cover the same portion of services or goods already covered by another funding source.
- Grantees may bill HUD and another funding source for the same client if the cost of counseling exceeds the amount of reimbursement covered by HUD.
- HUD may request documentation to verify HUD is not reimbursing grantees for activities already billed to another funding source.

Article IX: Cost (4 of 4)

Burden of proof:

- The burden of proof for services rendered rests with the grantee
- All grant expenditures and supporting records are subject to review
- Improper payments may be disallowed and subject to repayment using non-federal funds or an offset to current or future grant awards.

Article X, XI and XIV

Dita McCarthy

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Article X: Reporting (1 of 7)

- Grantees must submit Grant Activity Reports (GAR) in conjunction with each drawdown request.
- GARs must include all information indicated in the grant agreement.

Article X: Reporting (2 of 7)

- Grantee's name, address, and grant number
- Start and end dates of the reporting period
- Staff and hourly rate: Identify each counselor or other employee whose time or activity, or both, is billed to the grant, the individual's title, the individual's [FHA Connection housing counselor ID number](#) demonstrating certification (as applicable), and the hourly rate used to calculate reimbursement.
- Fixed fee methodology (if applicable)
- Itemized expenses
- Required certification
- Form HUD-9902
- Reverse Mortgage (HECM) default counseling activities (if applicable)

Article X: Reporting (3 of 7)

In addition to the previous slide, Intermediaries, SHFAs, and MSOs must submit the following:

- Oversight activity (if applicable)
- Sub-allocations
- Costs of managing a network
- Federal financial report ([SF-425](#))
- Changes in composition or network size (Subgrantees and funded branches)

Article X: Reporting (4 of 7)

Final Report:

- A final report is due 120 days after the period of performance has ended.
- If the grantee does not submit all reports in accordance with this section within one year of the period of performance end date, the Federal awarding agency must report the grantee's failure to comply with the terms and conditions of the award with the OMB-designated integrity and performance system (currently [FAPIIS](#)).

Article X: Reporting (5 of 7)

Final Report:

- Any problems, delays, or adverse conditions that impaired their ability to meet the objective of the federal award, and any favorable developments which enabled their ability to meet the objective of the federal award sooner or at less cost.
- Grantees with expired grants and undisbursed balances at the end of the PoP must provide a narrative description explaining the challenges leading to delays in grant closeout.

Article X: Reporting (6 of 7)

Submit a certification, signed by an authorized individual, which states that all applicable closeout activities required in [2 CFR 200.343](#) have been completed. This certification is in addition to the certification statement required in quarterly reports.

Submit a NICRA containing final rates for any period for which the grantee received reimbursement of indirect costs.

- This obligation exists even post-closeout.
- Grant award may be adjusted to account for revisions to final indirect costs rates (See [2 CFR 200.435\(a\)](#)).

Article X: Reporting (7 of 7)

Compliance with NOFO obligations: Should the grantee fail to meet the commitments made in the grant application, HUD may adjust the award amount and require repayment using non-federal funds or an offset to future grant awards. May include but are not limited to:

- Network size
- Oversight of funded network
- Counselors

Article X: Federal Sub-award Reporting (Only for Intermediaries, MSOs, and SHFAs)

- Report required for sub-awards of \$30,000 or more.
- Entities with gross incomes less than \$300,000 in the previous tax year are exempt from sub-award reporting requirements.
- Details found at: fsrs.gov
- Report is due one month after the month in which the sub-award is obligated.

Article XI: Payment Requests

Article XI is where to find information on:

- General payment procedures
- Documentation of expenses

Article XI: General Payment Procedures

- HUD will only process payment requests on receipt of an acceptable Grant Activity Report (GAR).
- After making the voucher request in [eLOCCs](#), email a signed copy of the voucher form to your HUD POC. All sections of the [HUD-50080](#) must be complete.
 - Budget line Items 9500 and 9525
 - Program area CHC
- [LOCCS user guides](#).

Article XI: Documentation of Expenses

Maintain documentation of direct costs:

- Invoices
- Receipts
- Cancelled checks
- Documentation of personnel expenses

Submit to HUD POC upon request. Expense documentation is requested during a performance review.

Article XIV: Defaults and Remedies

Delayed use of grant funds may result in default and recapture:

- Failure to execute the grant before the end of the period of performance.
- Failure to submit a drawdown request for all remaining funds within 120 days following the end of the period of performance.

Conclusion

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Questions

- Questions may be entered into the chat box or asked live. Please use the “Raise Your Hand” feature in Teams if you would like to ask your question live.
- Any questions not answered during this training will be answered by HUD via email.

Before You Go

Please give us feedback in the Chat box.

- Was this webinar useful to you? Will you share the information with your co-workers?
- Any other comments?

Office of Housing Counseling Resources



- Find us at: hudexchange.info/counseling
- [Archived Webinars on reporting](#)
- [HUD-9902 Online Toolkit](#)
- [OHC Gov Delivery](#) sign up for industry emails
- Email HUD at: housing.counseling@hud.gov