Subject: Performance Reporting Requirements and Grant Close-Out Procedures for the Indian Housing Drug Elimination Program (IHDEP)

I. Purpose

The purpose of this Notice is to clarify the procedures to be followed by tribes, tribally designated housing entities (TDHEs) and Alaska Native Villages in complying with performance reporting and in closing out a grant agreement for the Indian Housing Drug Elimination Program (IHDEP).

II. Background

In accordance with 24 CFR Part 761.35, IHDEP grantees are required to manage and monitor the day-to-day operations of the grant and subgrant activities to assure compliance with applicable federal requirements and achievement of performance goals. IHDEP grantees are required to report on the performance (narrative and financial) of approved activities for each grant on a semi-annual basis and to submit final “close-out” performance reports (narrative and financial) at the end of the grant term.

The Office of Management and Budget (OMB) Circular-102, codified in 24 CFR Part 85.50, establishes uniform rules governing the use of grants, contracts, and cooperative agreements for state, local, and Indian tribal governments administering federal grants. OMB Circular A-87 establishes cost principles for state, local, and Indian tribal governments. These circulars apply to both grantees and sub-grantees receiving IHDEP grants.
III. Performance Reporting Requirements

If you are a tribe/TDHE that previously submitted your data via the Internet-based reporting system for the Public and Indian Housing Drug Elimination Program, you will no longer have access to either the previous Drug Elimination Reporting System (DERS) or the new Public and Indian Housing Information Center (PIC) system.

Instead, all IHDEP grantees are required to submit a semi-annual performance report and a semi-annual financial status report (SF-269A) for each open and active grant to the Area Office of Native American Programs (AONAP). “Open and active” refers to any grant not closed-out and any grant for which activities were undertaken during the reporting period.

Semi-annual performance reports and semi-annual financial status reports (SF-269A) must be submitted on or before July 30th for the January-June reporting period and on or before January 31st for the July-December reporting period. The IHDEP grant funds will be suspended in the Line of Credit Control System (LOCCS) if the AONAP does not receive the report by the deadline.

Semi-annual performance report: The semi-annual performance report should evaluate the grantee’s performance against its plan and shall include (but need not be limited to) the following:

- Any change or lack of change in crime statistics or other indicators drawn from the applicant’s plan assessment and an explanation of any difference;
- Successful completion of any of the strategy components identified in the applicant’s plan;
- A discussion of any problems encountered in implementing the plan and how they were addressed;
- An evaluation of whether the rate of progress meets expectations;
- A discussion of the grantee’s efforts in encouraging resident participation;
- A description of any other programs that may have been initiated, expanded, or deleted as a result of the plan, with an identification of the resources and the number of people involved in the programs and their relation to the plan, and
- Any other information deemed necessary by the grantee.

SF-269A: The amounts included on the form must not be in excess of the budgeted amounts approved for the project activities. If the SF-269A indicates that excess funds have been provided to the grantee, the excess funds must be sent to HUD. If the grantee is owed additional funds, funds may be requested through the Voice Response System in LOCCS.

IV. Close-Out Actions by Grantees

It is the grantee’s responsibility to comply in full with all closeout requirements and to submit reports in a timely manner. The grantee should refer to all applicable HUD requirements as well as all general and special conditions contained in the grant agreement. No later than 90 days after the grant termination date (or revised termination date based on an approved extension or early termination by HUD for cause), grantees are required to submit a “Close-Out Report” as part of the narrative section of their final IHDEP Semi-Annual Report. This report must meet the requirements found at § 761.35(b) and §
85.50 for the submission of a “Final Performance Report” and the “Post Grant Report.” In order to meet these requirements, the “Close-Out Report” must cover the entire term of the grant and contain the same elements required for the semi-annual performance report.

In addition to the “Close-Out Report,” grantees are required to submit a final financial status report (SF-269A) to the appropriate AONAP upon completion of approved grant activities or within 90 days of the termination of the grant. This report will be a cumulative summary, from the date of the grant agreement to the termination date of the grant agreement, and will include expenditures to date and the exact balance of unexpended funds.

Grantees must ensure that the IHDEP grant that is scheduled to be closed-out is included as part of the tribe’s/THDE’s overall independent public audit. The independent auditor verifies that all IHDEP expenditures were authorized and determines if the grantee owes or is due any funds for the grant period. Upon completion and issuance of the audit report, a copy must be provided to the AONAP. The grantee must resolve any IHDEP-related findings contained in the audit report in cooperation with the AONAP.

/s/
Paula O. Blunt, Acting General Deputy
Assistant Secretary for Public and Indian Housing