



HUD Update

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Boston Regional Office**

**NCDA Region I Fall Meeting
11.17.2021**



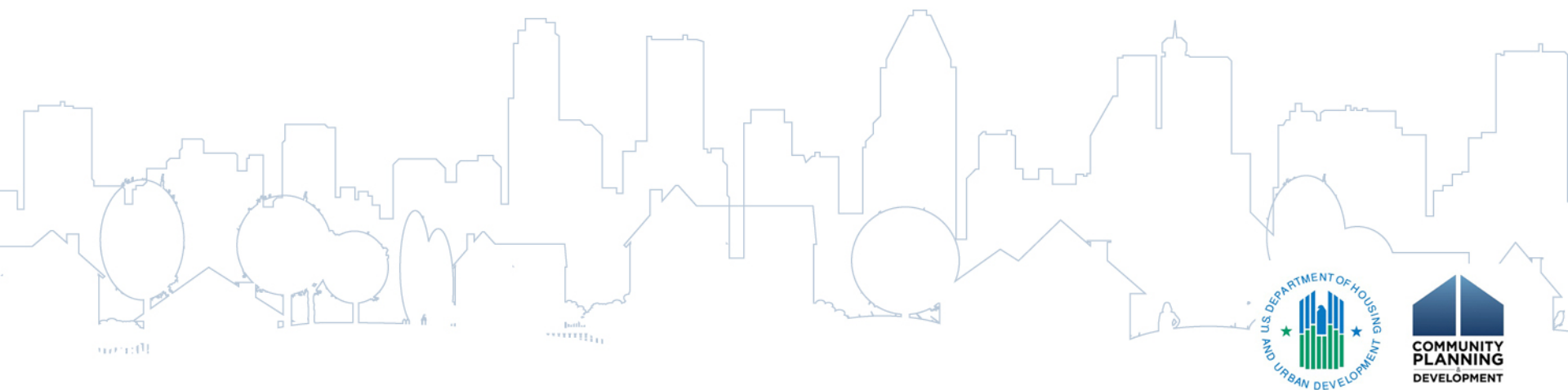
Overview

- FY 2021 Remote Monitoring
- HOME-ARP
- CDBG Timeliness
- CARES Act Expenditure Deadlines
- COVID-related Waivers
- Training
- Technical Assistance
- Section 3
- NSP Closeout Process
- New HUD Staff
- Q & A





2021 Remote Monitoring Round Up



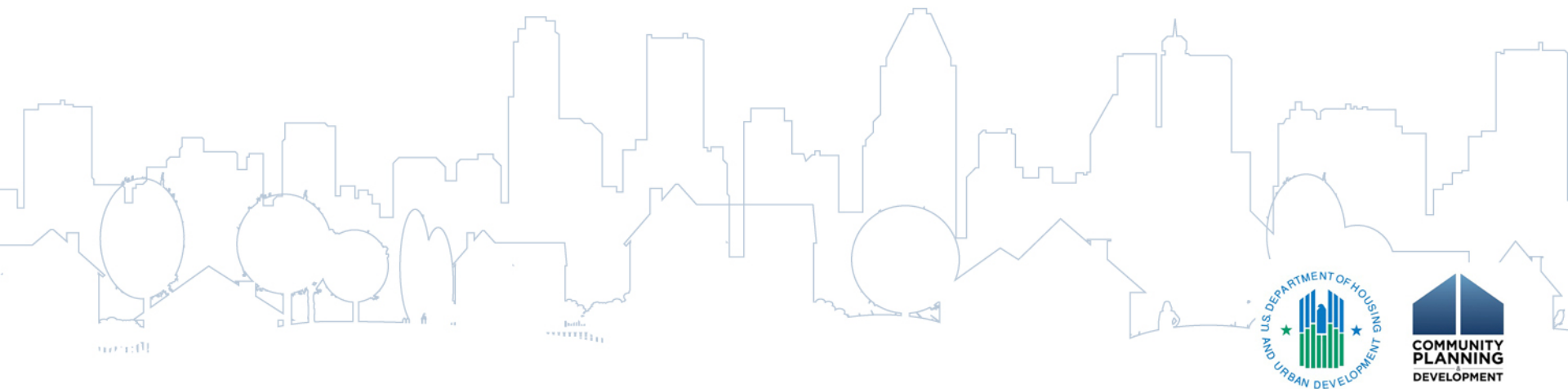
Remote Monitoring: Personally Identifiable Information

- PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual (See 2 CFR 200.1 for complete definition).
- Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.



Remote Monitoring: Personally Identifiable Information

- Many grantees monitored last fiscal year either did not have a written PII policy or their policy did not include all required information.
- Grantees also did not include PII requirements in subrecipient agreements.



Remote Monitoring: Financial Management

Top 10 questions to ask about your financial management system:

1. Do you have a separate accounting of each grant?
2. Is the grant properly identified in the financial management system by the following?
 - assistance listing title and number (formerly CFDA)
 - federal award identification number (grant #) and year
 - name of the federal agency



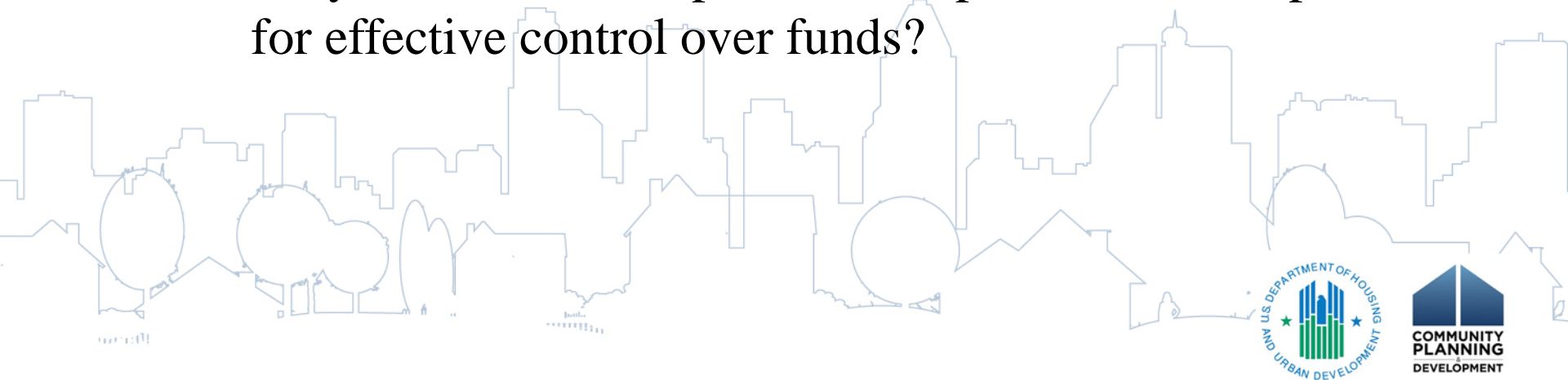
Remote Monitoring: Financial Management

3. Do you have a budget for each grant and does that tie to the Action Plan?
4. Are you able to identify the following by grant:
 - Obligations/Encumbrances
 - Unobligated balances
 - Assets
 - Expenditures
 - Revenue and program income



Remote Monitoring: Financial Management

5. Is IDIS regularly reconciled to the City's general ledger?
Are you entering program income when received and drawing down funds when it's expended?
6. Is this reconciliation reflected in the PR26 report at the end of the program year?
7. Do you have written policies and procedures that provide for effective control over funds?



Remote Monitoring: Financial Management

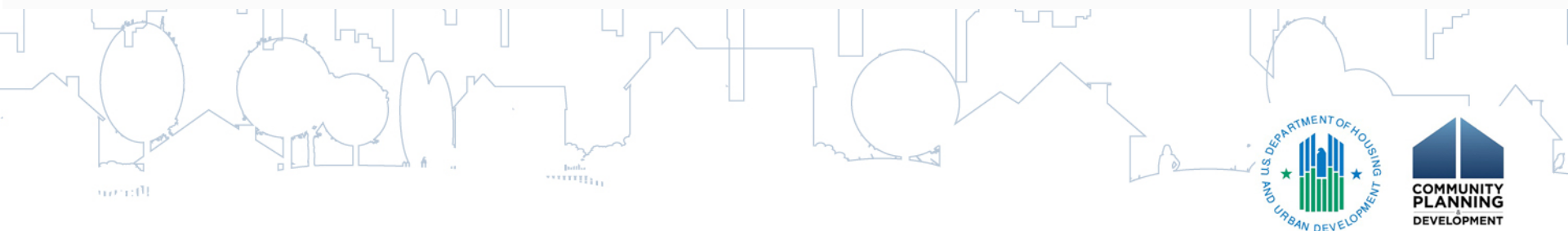
8. Are payments only processed when adequate supporting documentation has been provided? Is there a segregation of duties and are transactions properly authorized?
9. Do subrecipient agreements contain all the requirements for pass-through entities at 2 CFR 200.332 and agreements with subrecipients at 24 CFR 570.503, including audit requirements?
10. Did the City procure the auditor as required by 2 CFR 200.509(a)?



Remote Monitoring: Financial Management

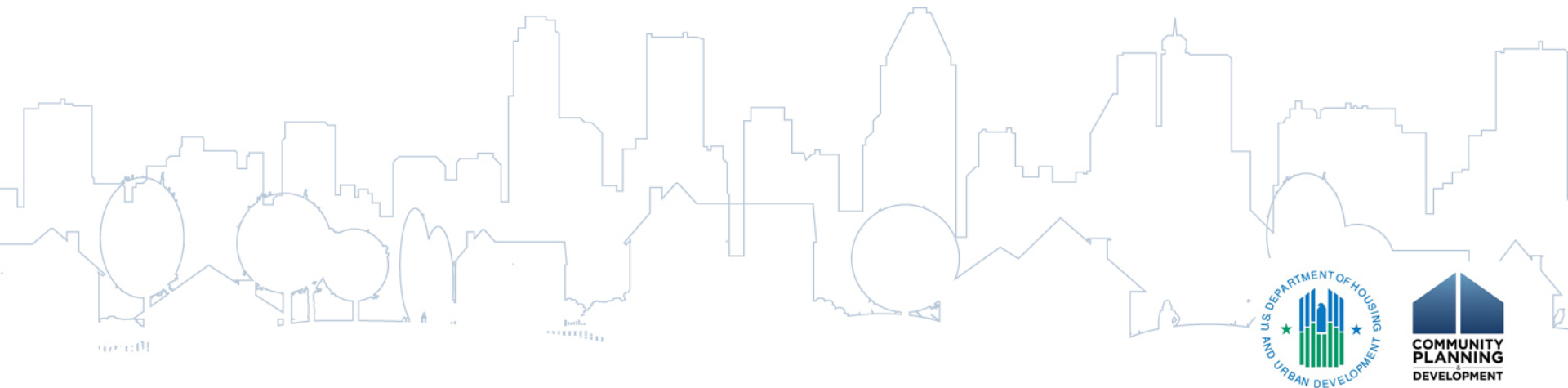
§ 200.509 Auditor selection.

- (a) **Auditor procurement.** In procuring audit services, the auditee must follow the procurement standards prescribed by the Procurement Standards in §§ 200.317 through 200.327 of subpart D of this part or the FAR (48 CFR part 42), as applicable. In requesting proposals for audit services, the objectives and scope of the audit must be made clear and the non-Federal entity must request a copy of the audit organization's peer review report which the auditor is required to provide under GAGAS. Factors to be considered in evaluating each proposal for audit services include the responsiveness to the request for proposal, relevant experience, availability of staff with professional qualifications and technical abilities, the results of peer and external quality control reviews, and price. Whenever possible, the auditee must make positive efforts to utilize small businesses, minority-owned firms, and women's business enterprises, in procuring audit services as stated in § 200.321, or the FAR (48 CFR part 42), as applicable.





HOME ARP



HOME ARP

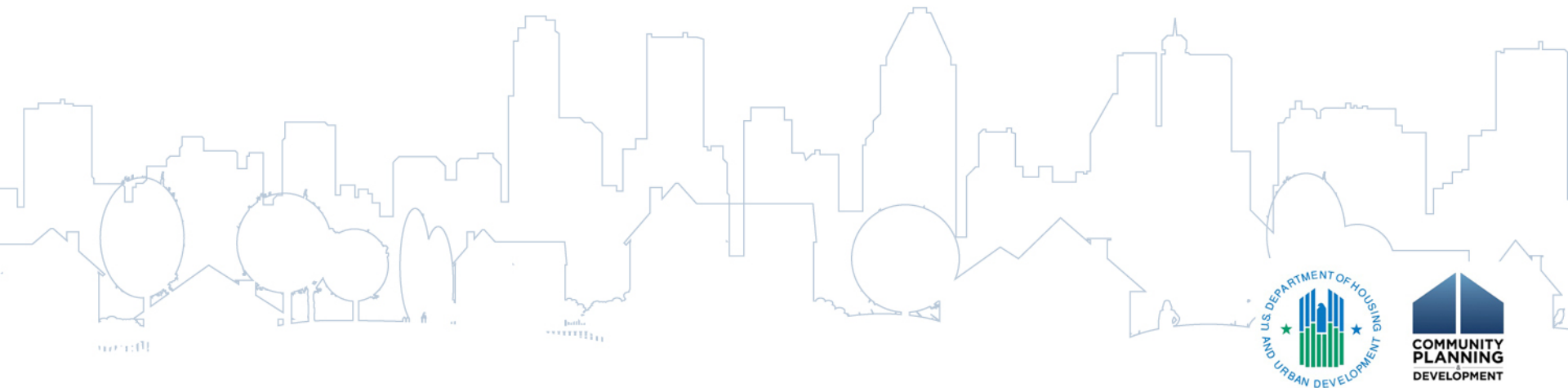
Allocation Plan Submission

- November 22nd IDIS release will include a new attachment point on the AD screen to allow PJs to upload their ARP Allocation Plan to their FY21 Action Plan.
- Guidance, including the Allocation Plan template and certifications, is available here:
<https://www.hudexchange.info/programs/home-arp/>
- PJ's may not commit funds to HOME-ARP projects until it has submitted its HOME-ARP Allocation Plan and HUD has reviewed and accepted the Plan.





CDBG Timeliness



CDBG Timeliness

- On September 30, 2021, the corrective action suspension for violations of the CDBG timeliness standard ended.
- Because of the unprecedented funding levels available to grantees through the 2023 fiscal year, HUD is revising its corrective action process to make it more progressive.



Timeliness

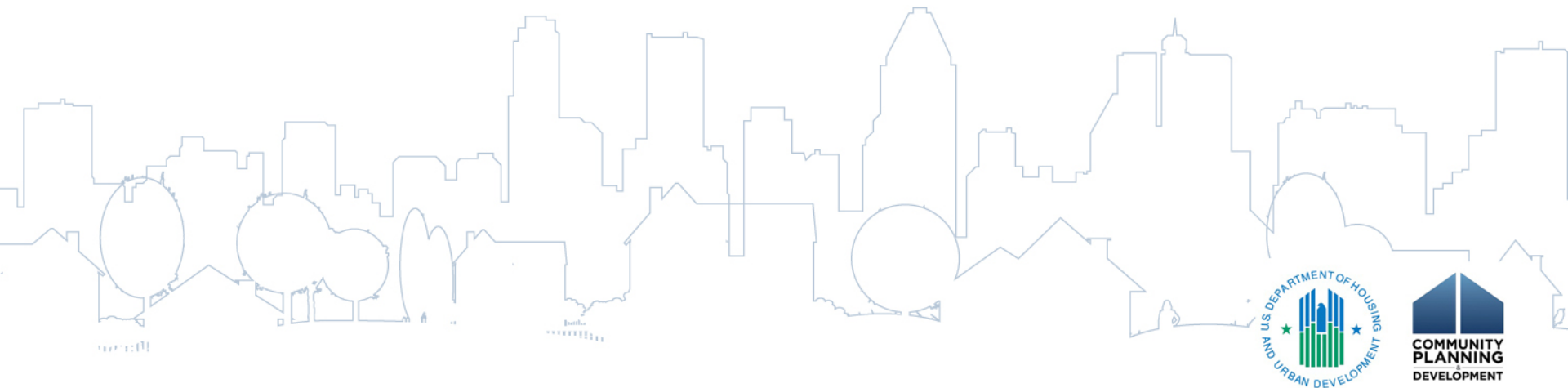
CDBG Timeliness Status Table (2/1/2020 Test Date or Later)

| Grantee timeliness status in FY19 on its test date | Action taken if untimely in FY 2022 | Action taken if still untimely in FY2023 |
|---|--|---|
| Timely | Sent warning letter | Required to submit workout plan |
| Untimely for the first time | Required to submit workout plan | Invited to informal consultation |
| Untimely for the second consecutive year or more | Invited to informal consultation | Invited to informal consultation |





CARES Act Expenditure Deadlines



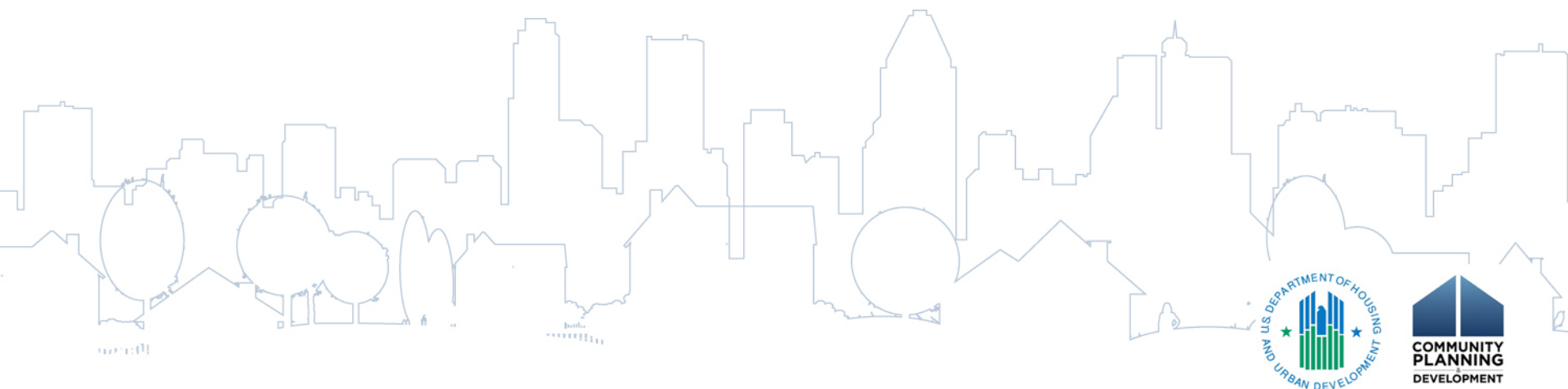
CARES Act Expenditure Deadlines

- **CDBG-CV**
 - 80% - 3 years from date CPD Director signed the grant agreement
 - 100% - 6 years from the date the CPD Director signed the grant agreement
- **ESG-CV**
 - 20% by 9/30/21
 - 80% by 3/31/22
 - 100% by 9/30/22
- **HOPWA-CV**
 - 3 years for date grantee signed the grant agreement; 2-year extension is possible





COVID-related Waivers



HOME Waivers

HOME Extensions, Revisions and Updates; Effective 9/30/2020

| Suspension/Waiver | Extended Thru | Revision/Update |
|------------------------------|---------------|---|
| Match | 9/30/2022 | Applies to funds expended for PJ for FY20, FY21 and FY22. |
| Maximum per unit subsidy | 3/31/2022 | Only applies to new projects and projects that are currently underway or in the planning stages. to which HOME funds will be committed on or before 3/31/2022. |
| On-site inspections (rental) | 12/31/2021 | Extends the period to perform delayed onsite inspections after the waiver period from 120 days to 180 days. |
| Annual inspections (TBRA) | 12/31/2021 | Extends the waiver to perform onsite inspections and extends the timeframe to physically inspect units that would have been subject to on-going inspections during the waiver period to 180 days from 12/31/2021. |
| 4- year project completion | 3/31/2022 | For projects with project completion deadlines occurring between 10/1/2021, and 3/31/2022, if the PJ will implement this waiver <u>and has not notified HUD</u> , the PJ must notify HUD within a reasonable time prior to the date of the four-year project completion deadline. No action is needed if the PJ already notified HUD. |
| PJ response to findings | 3/31/2022 | None |

ESG Waivers

ESG Waivers

- Available waivers/flexibilities are effective per the ESG-CV Notices CPD-20-08 ([here](#)) and CPD-21-08 ([here](#)).
- There's no need to look to the Mega Waiver Memos to see what's effective, since most Mega Waiver waivers have now expired but were incorporated into the Notices.
- The waivers/flexibilities in the Notices apply to *annual* ESG funds too, if those funds are used to prevent, prepare for, and respond to coronavirus.
- Look [here](#) for a great summary of the waivers/flexibilities available.



CoC Waivers

| CoC Waivers | 06/30/2021 Waiver Memo Notes |
|--|--|
| Third-Party Documentation of Income | expired 9/30/2021 |
| Housing Quality Standards – Initial Inspection of Unit | extended through 12/31/2021 (Must have written policies indicating intent to physically inspect by 12/31/2021) |
| Suitable Dwelling Size and Housing Quality Standards | extended for leases executed up to 12/31/2021 and extending until the later of: 1) the end of the initial lease term <u>or</u> 2) 12/31/2021 |
| Assistance Available at Time of Renewal | grantees may continue to request non-permanent budget amendments through 12/31/2021 in response to COVID-19. The request for the amendment is considered notification of usage of the waiver; no additional request is required. |
| Permanent Housing-Rapid Re-housing Monthly Case Management | expired 9/30/2021 |
| Fair Market Rent for Individual Units and Leasing Costs | waived for any lease executed until 12/31/2021 |
| One-Year Lease Requirement | waived for any lease executed until 12/31/2021 |
| Limit on Eligible Housing Search and Counseling Services | extended through 12/31/2021 |
| Annual HQS Re-Inspection of Units | expired 9/30/2021 |
| Homeless Definition – Temporary Stays in Institutions of 90 days or less | extended through 12/31/2021 |
| Permanent Housing Rapid Re-Housing Limit to 24 Months of Rental Assistance | extended through 12/31/2021 |
| Disability Documentation for Permanent Supportive Housing (PSH) | extended through 12/31/2021 |



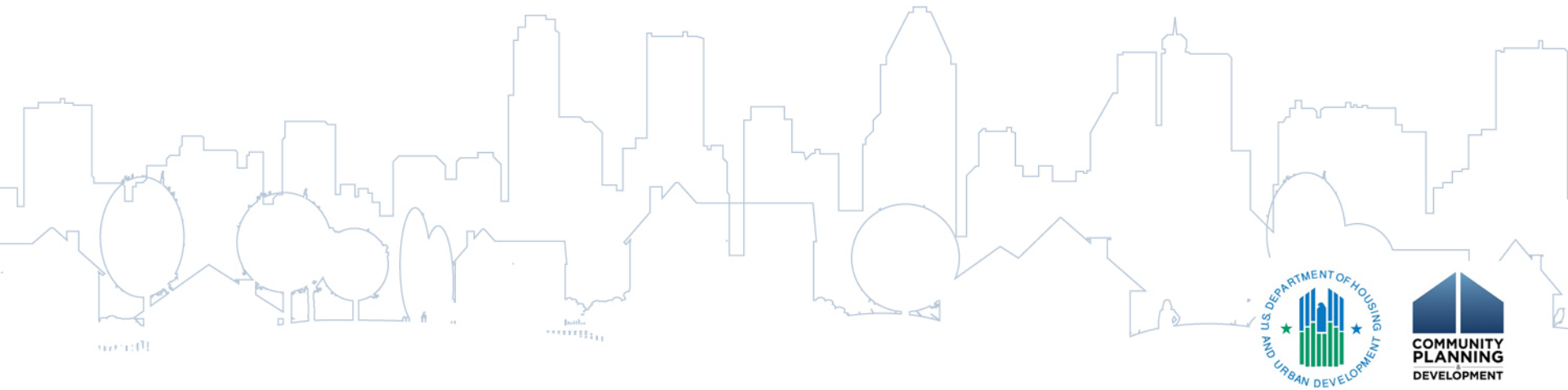
HOPWA Waivers

| HOPWA Waivers | Expiration |
|---|---|
| Self-Certification of Income and Credible Information on HIV Status | expired 9/30/2021 |
| FMR Rent Standard | extended through 12/31/2021 (rent reasonableness still applies) |
| Time Limits for Short-Term Housing Facilities and Short-Term Rent, Mortgage, and Utility Payments | expires 12/31/2021 |
| Property Standards | expired 9/30/2021 (the grantee or project sponsor must physically reinspect units not previously physically inspected by December 31, 2021) |
| Space and Security Standards | waived for grantees addressing appropriate quarantine space for affected eligible households during the allotted quarantined time frame recommended by local health care professionals. |





Training



Training

- CDBG-CV Best Practices Series – economic development and business assistance; public services; public facilities and building improvements; interim and affordable housing
- HOME ARP Training
- HUD Approved Housing Counseling Training



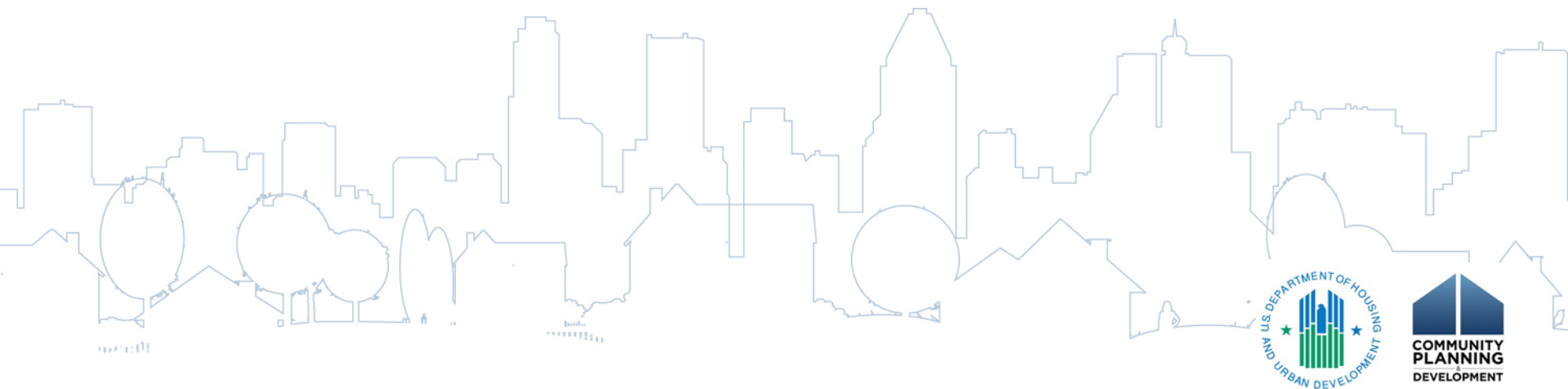
Training

- URA the HUD Way – 8 training modules covering the full scope of the Uniform Relocation Act.
- Certificate upon completion of all 8 modules.
- Region I Regional Relocation Specialist, Nancy Johnson will be conducting Listening Sessions in FY22 based on these modules. Feel free to contact her at: Nancy.A.Johnson@hud.gov.





Technical Assistance



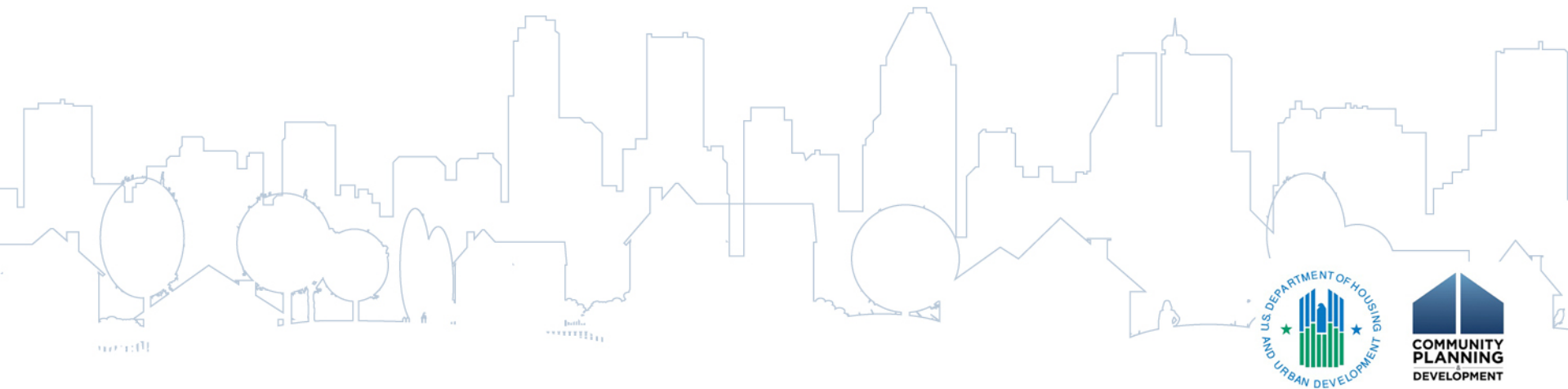
Technical Assistance

- CARES Act and the American Rescue Plan provided additional technical assistance resources for CDBG-CV, ESG-CV, HOPWA-CV and HOME-ARP
- Submit requests through the HUD Exchange
- Technical assistance requests options:
 - Grantee requested
 - Field office requested
 - HQ requested





Section 3



Section 3

- Section 3 of the Housing and Urban Development Act of 1968
- Ensures that employment and economic opportunities generated by certain HUD assistance go to low and very low-income persons and businesses “to the greatest extent possible”
- Section 3 requirements apply to housing rehabilitation, housing construction or other public construction activities



Section 3

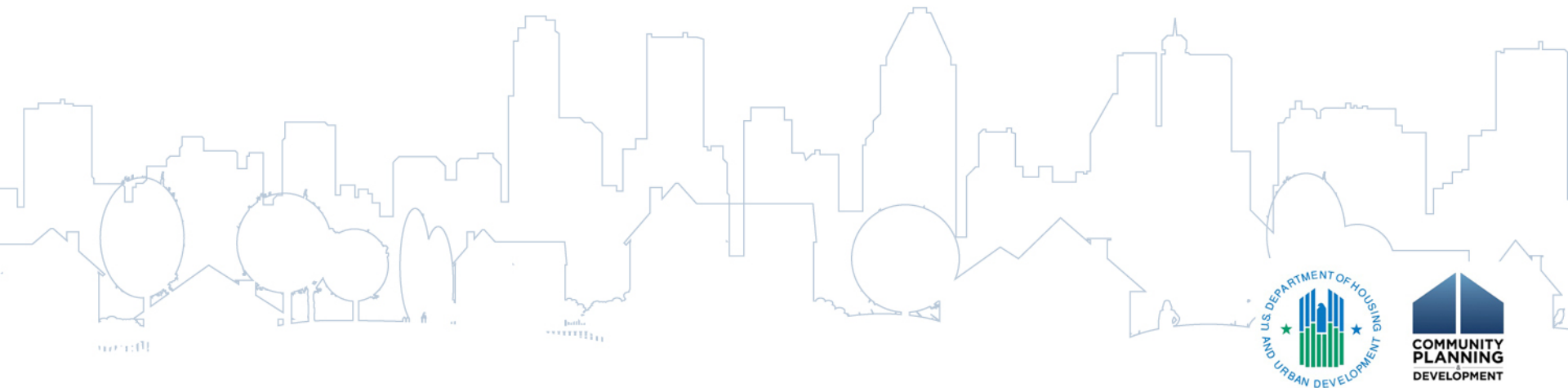
- Section 3 final rule, codified at 24 CFR Part 75, published in Federal Register on Sept 20, 2020
- Moved compliance from FHEO to program offices
- Compliance monitoring [reporting] and complaint management will be handled by program offices
 - CDBG, HOME, HOPWA, ESG

- <https://www.hudexchange.info/programs/section-3/>





NSP Closeout Process



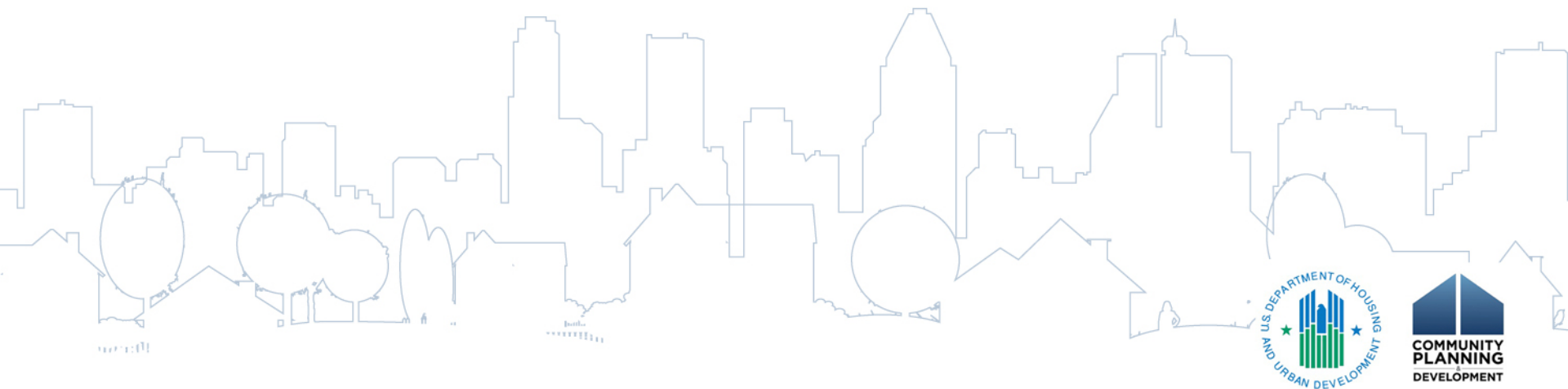
NSP Closeout Process

- No deadline established for closeout, but HUD has set goals for achieving closeout across the program.
- Contact your CPD Representative if you need help determining if you're ready for closeout or need technical assistance to complete the process.
- Technical assistance is available!





New Staff



New Staff

- Over the past 8 months we've added 4 new CPD Representatives to our pirate ship.
 - Kelsey Barringham
 - Burke Blackman
 - Jennifer Day
 - Alexandra (Alex) Jette





Q & A

