ESG Program:
Grant Management and Closeout

Marlisa Grogan, SNAPS

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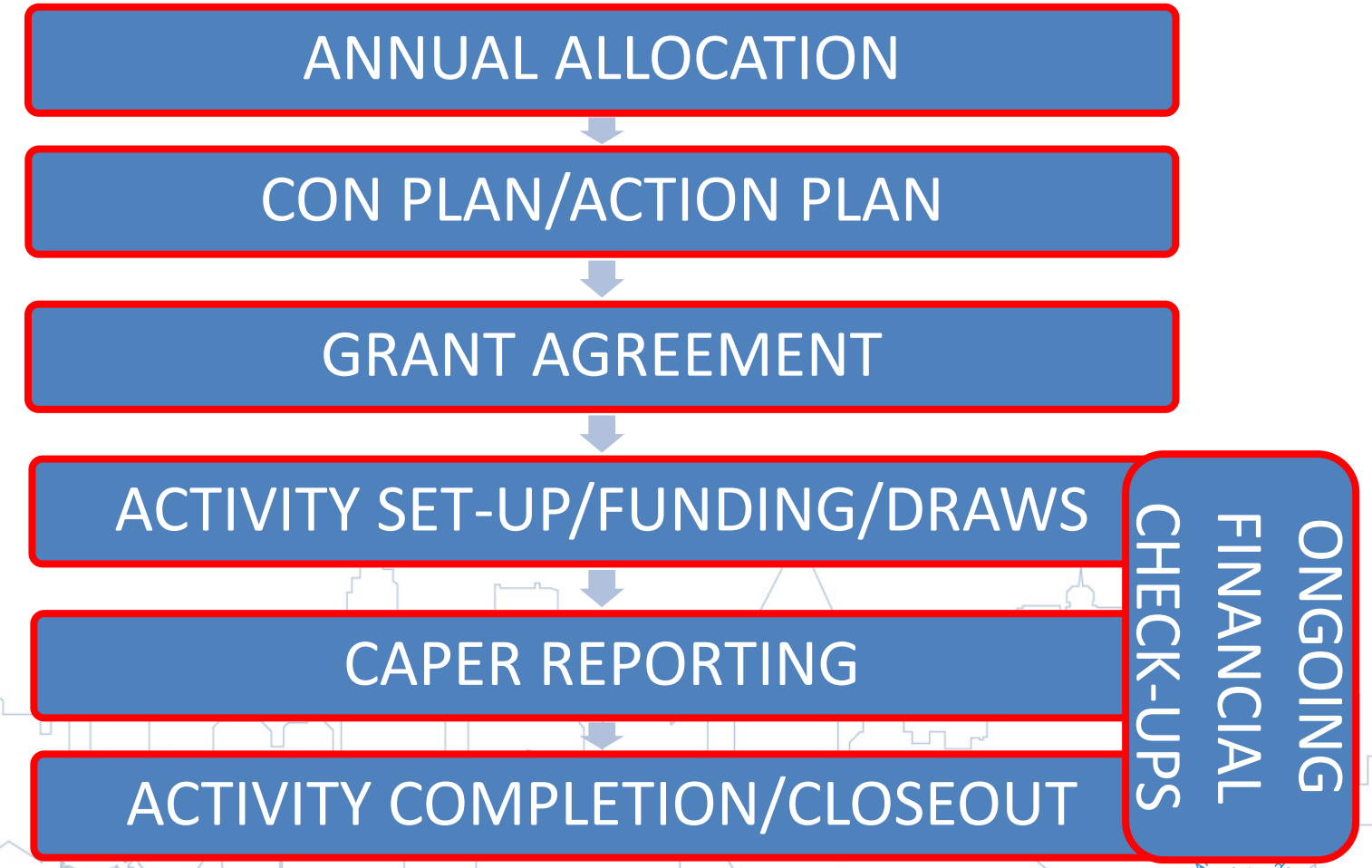
Objectives

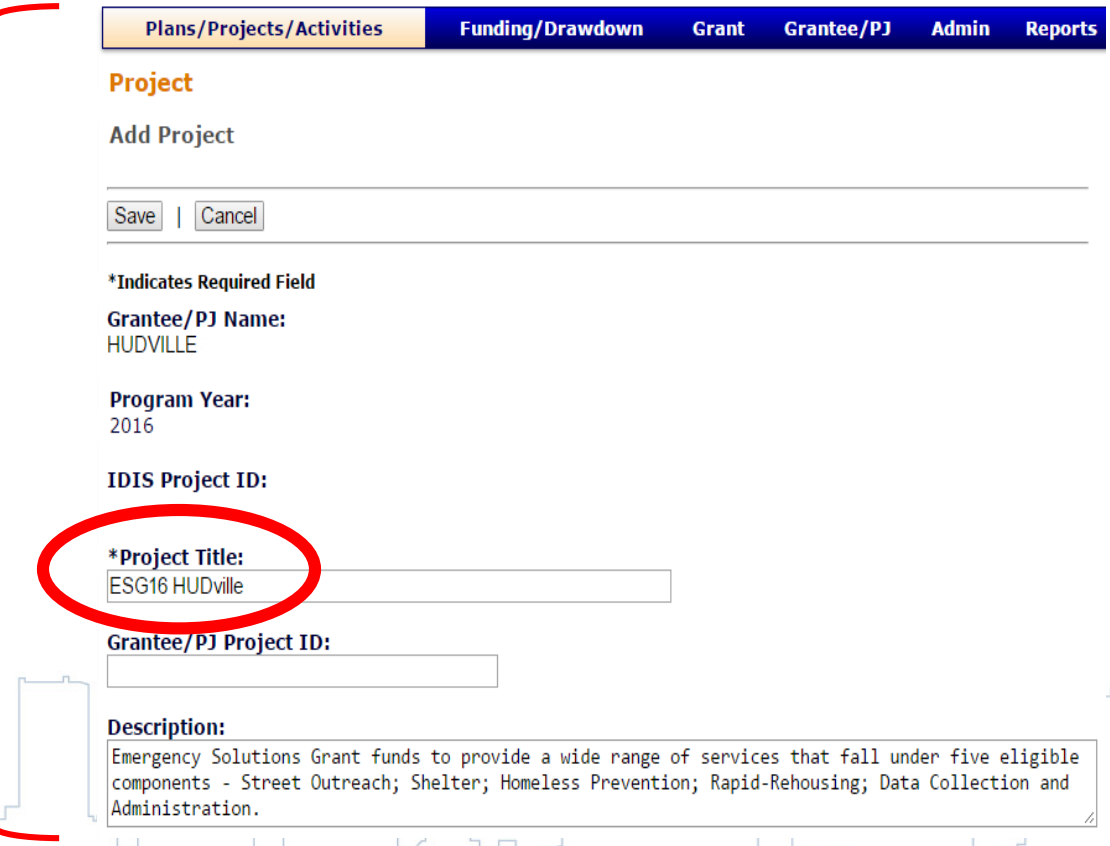
1. Provide an overview of grants management for the ESG Program
2. Identify ways to elevate performance through basic grants management principles
3. Introduce ESG Closeout Process

ESG Grant Life Cycle Overview



Annual Action Plan

- One HESG project per year
- Set-up project on AP-35 screen



Remember! Performance measures on AP-90 correspond to Project Outcomes on CR-70

Activity Set-up in IDIS

- Add on the Plans/Projects/Activities screen
- Associate with project created on AP-35 screen
- Sum of activity funding amounts equals annual allocation

Activity Name
ESG15 Street Outreach
ESG15 Shelter
ESG15 Rapid Re-Housing
ESG15 Homeless Prevention
ESG15 Data Collection (HMIS)
ESG15 Administration

Activity Funding and Draws

- **Follow proper activity funding setup**
- **Identify subrecipients for all activities**

Current Funding for This Source

Grant Year (tip)	Funded Amount	Drawn Amount	Subrecipient
2015	$ 12,255.00	$2,782.77	Subordinate: CATHERINE MCAULEY CENTER
2015	$ 10,000.00	$1,150.00	Subordinate: COMMUNITY INTERVENTION CENTER
2015	$ 16,755.00	$577.10	Subordinate: WOMEN'S RESOURCE CENTER, INC.

Add Subrecipient

Return to Add-Edit Funding | Save | Cancel

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Funding Activities – Key Requirements

- Administration Cap: 7.5%
- ES/SO Expenditure Cap – Greater of:
  - 60% of that total fiscal year grant amount and
  - amount of funds committed to homeless assistance activities under the 2010 Emergency Shelter Grants program grant.
- Grant Based Accounting Principles –
  - 2017 activities set up under 2017 project, 2018 activities set up under 2018 project, etc.

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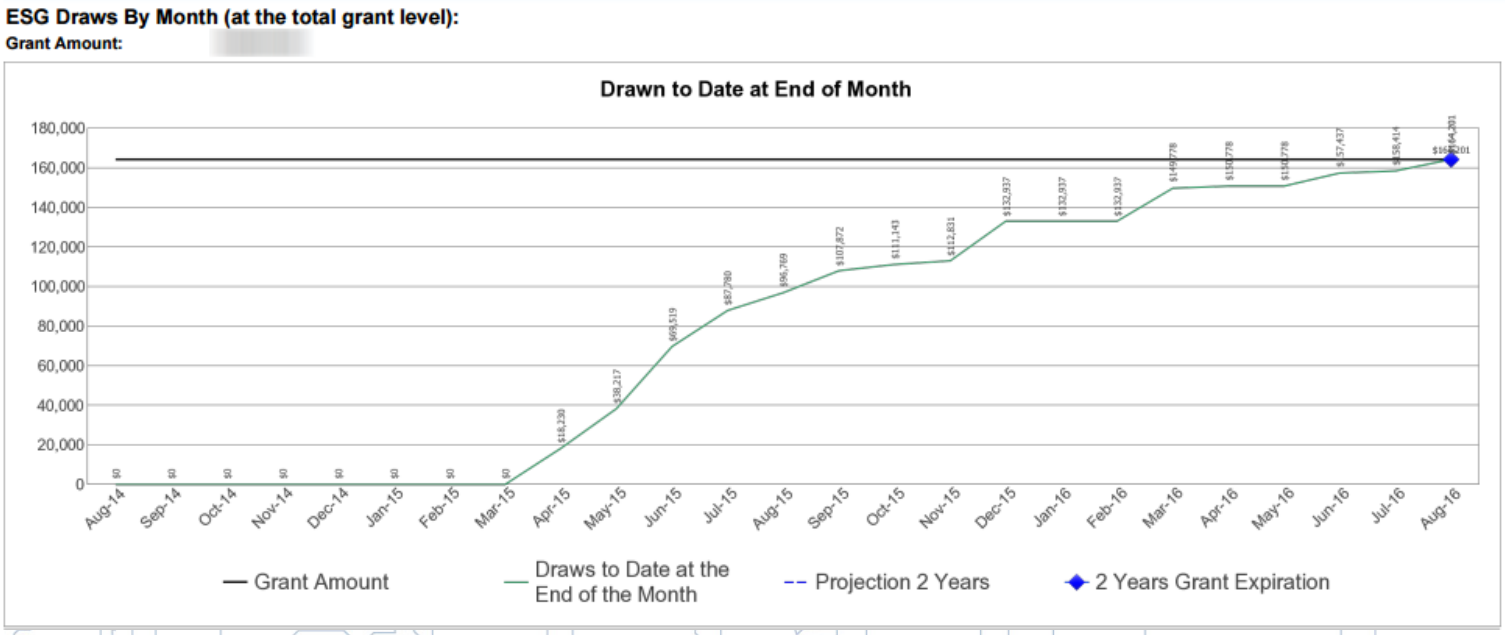
12-month Financial Check-up

- **Are expenditures and draws on pace?**



- **Review PR91 ESG Financial Summary and PR93 ESG Risk Status Reports**

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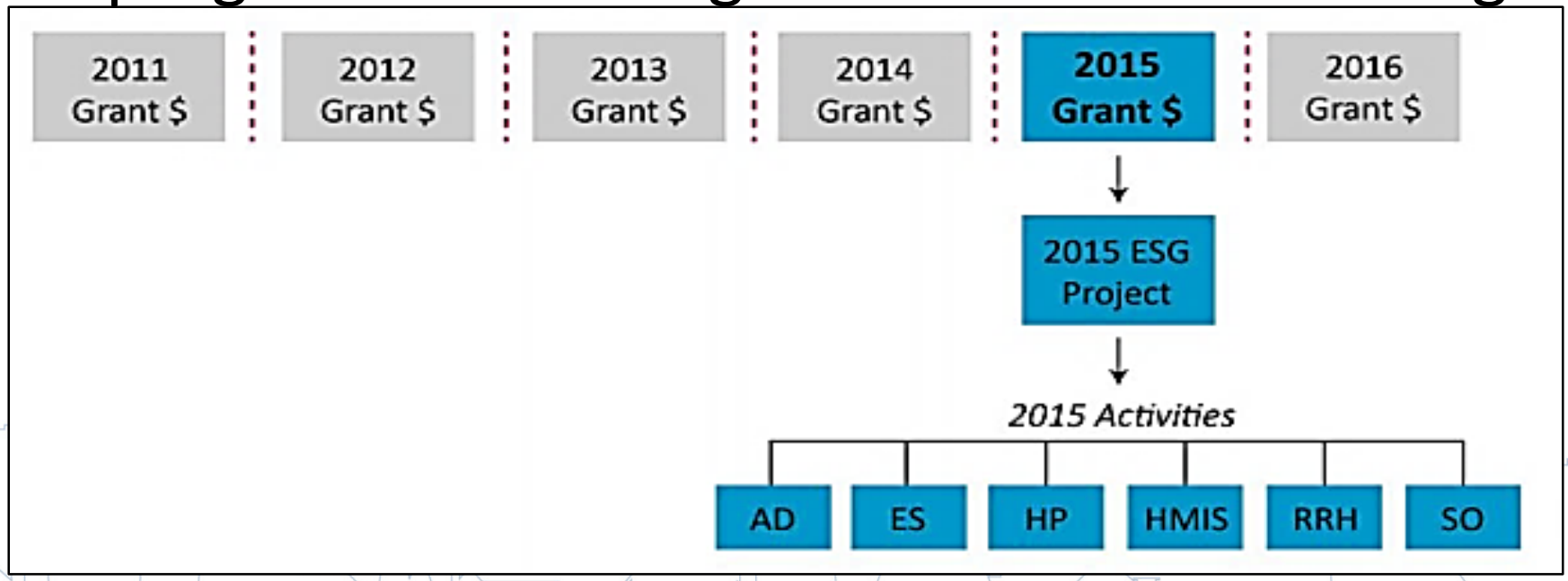
Expenditures Off-Pace?

- Review expenditures by activity and subrecipient (see PR 91 and PR93)
- Reprogram funds using Grant Based Accounting



- Review Citizen Participation Plan for Substantial Amendment thresholds

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ESG CAPER

The Regulation:
§91.520(g)

- **CAPER is due 90 days after program year ends**
- CAPER is the primary mechanism for ESG accomplishment reporting, **replacing** IDIS beneficiary data screens.
- The Con Plan regulations require ESG recipients to report on:
  - Number of persons assisted
  - Types of assistance provided
  - Project outcomes

ESG CAPER Screens

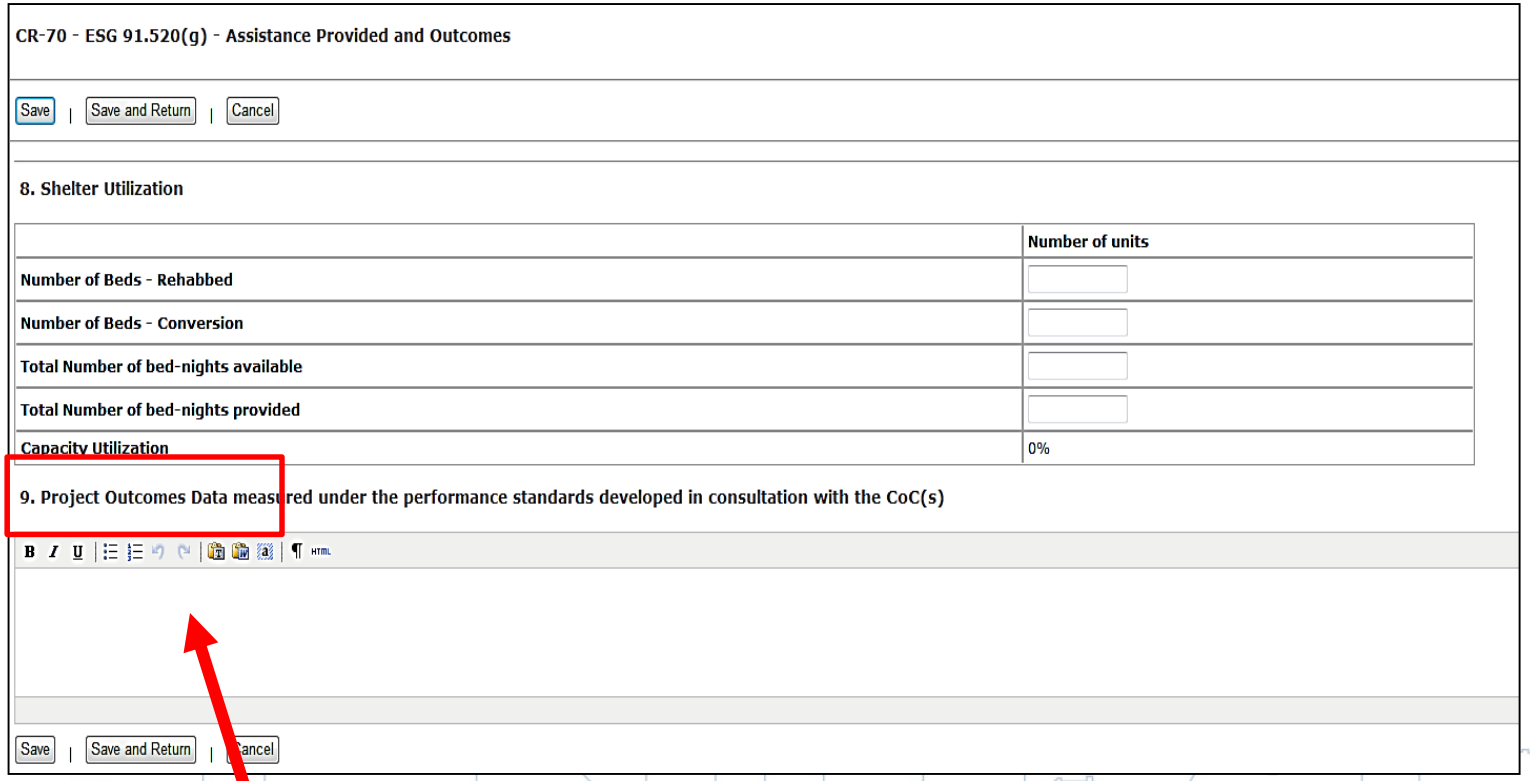
CR-60 Subrecipient Information: Manually completed using internal records.

CR-65 Persons Assisted: Replaced by Sage. Instead, **Sage combined report attached to screen CR-00**.

CR-70 Assistance Provided and Outcomes: Manually completed using recipient's internal records.

CR-75 Expenditures: Manually completed using recipient's internal financial records.

ESG Program CAPER: CR-70



CR-70 - ESG 91.520(g) - Assistance Provided and Outcomes

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8. Shelter Utilization

	Number of units
Number of Beds - Rehabbed	
Number of Beds - Conversion	
Total Number of bed-nights available	
Total Number of bed-nights provided	
Capacity Utilization	0%

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

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Project outcomes must correlate with performance standards identified in the Action Plan on screen AP-90.

18-Month Financial Check-up

- Focus on and step up efforts on meeting the 24- month expenditure deadline – even as new grants are awarded
- Review PR91 and PR93 reports
- Focus on subrecipient draw rates/outreach to those expending too slowly
- Reprogram as necessary; follow citizen participation requirements to determine if a substantial amendment is required

Activity Completion

Helpful questions prior to activity completion:

- Are draws accurate?
- Have all funds been drawn?
- Where will remaining funds be reprogrammed?
- Has data entry and reporting been completed in HMIS? CAPER? Sage?

Don’t forget! Record retention requirements for ESG is 5 years.

ESG Closeout Process

SNAPS sends financial reports to FO every **quarter**.

FO & recipients identify funds to be recaptured or retained **within 30 days**.

30 days

Quarterly

SNAPS recaptures funds at the **end of each quarter** and sends FO & OPDC report of grants with $0.

Financial Reconciliation

FO & recipient verify grants ready to be closed out.

FO sends recipient Grant Closeout Certification form to complete.

Quarterly

120 days

Recipient returns completed Grant Closeout Certification and required reports to FO **within 90 days**.

FO has **120 days** to complete program review for closeout, including +/- adjustments.

FO sends scanned copies of checklist & certification to SNAPS; scanned copy of checklist to recipient.

Program Review for Closeout

SNAPS sends OPDC a report of all grants that are ready for closeout.

Quarterly

Quarterly

OPDC enters the "901" accounting closure code to close the grant in PAS and tracks the grants that are successfully closed out.

Grant Closeout

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Criteria for Closeout

In general, a grant is ready for closeout when the following conditions are met:

- All activities are eligible and were completed;
- All grant funds were expended and drawn down in full or any remaining funds are to be returned to HUD;
- All reporting requirements were completed and submitted (except for the final report that is submitted during the closeout process, if applicable);
- Any special conditions were met; and
- All audit and monitoring issues affecting the grant were resolved.

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Financial Reconciliation

Financial Reconciliation. ESG grants are reconciled financially when:

- all expenditures and draws are complete;
- all repayments required as part of monitoring or audit findings have been made;
- all upward or downward adjustments have been made; and
- the grant has a $0 balance in the Line of Credit Control System (LOCCS) and the Integrated Disbursement and Information System (IDIS).

Financial Reconciliation

- **Expenditure/Drawdown Requirements**
  - Expend funds within 24 months of date HUD signs grant agreement
  - Draw down funds within 90 days after the expenditure deadline
- **Remedial Actions.** If determining that recapture is not the best remedy, FO may issue a finding with the corrective action to expend the remaining funds based on the conditions they specify (i.e., spending plan, established timeline with milestones, routine check-ins, new deadline, etc.)

Quarterly Financial Review

- **Available Balances.** Grants that have exceeded the 24-month expenditure deadline with remaining balances. FO works with recipients to determine whether the remaining funds should be retained or recaptured.
  - **Under $10K remaining**: SNAPS will mark funds for deobligation after 30 day review period, unless FO indicates the funds should be retained.
  - **$10K+ remaining**: SNAPS DO will follow up with FO for final determination.
- **Cancelled Funds.** Grants with remaining funds that are about to be cancelled due to the 8-year deadline established by the National Defense Authorization Act (NDAA of 1991).
- **Expiring Funds (Reservations).** Grants that are reserved but have not yet been obligated by HUD via grant agreement.

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Resources

- **Financial Management Webinar Series for ESG**
  https://www.hudexchange.info/trainings/courses/esg-program-grant-life-cycle-in-idis-webinar/
- **ESG Grant Based Accounting Fact Sheet**
  https://www.hudexchange.info/resource/4893/guidance-for-esg-recipients-grant-based-accounting/
- **Using IDIS Online for the Emergency Solutions Grants Program Manual**
  https://www.hudexchange.info/resource/1857/using-idis-online-for-the-emergency-solutions-grants-esg-program/
- **Consolidated Plan in IDIS Desk Guide**
  https://www.hudexchange.info/resource/2641/econ-planning-suite-desk-guide-idis-conplan-action-plan-caper-per/
- **Sage/CAPER Resources**
  https://www.hudexchange.info/news/release-of-ecart-materials-faqs-and-subrecipient-guidance/
- **Coordination and Collaboration for CoCs and Con Plan Jurisdictions Guide and Video**
  https://www.hudexchange.info/resource/4988/coordination-and-collaboration-for-cocs-and-con-plan-jurisdictions-guide-and-video/