HUD Update

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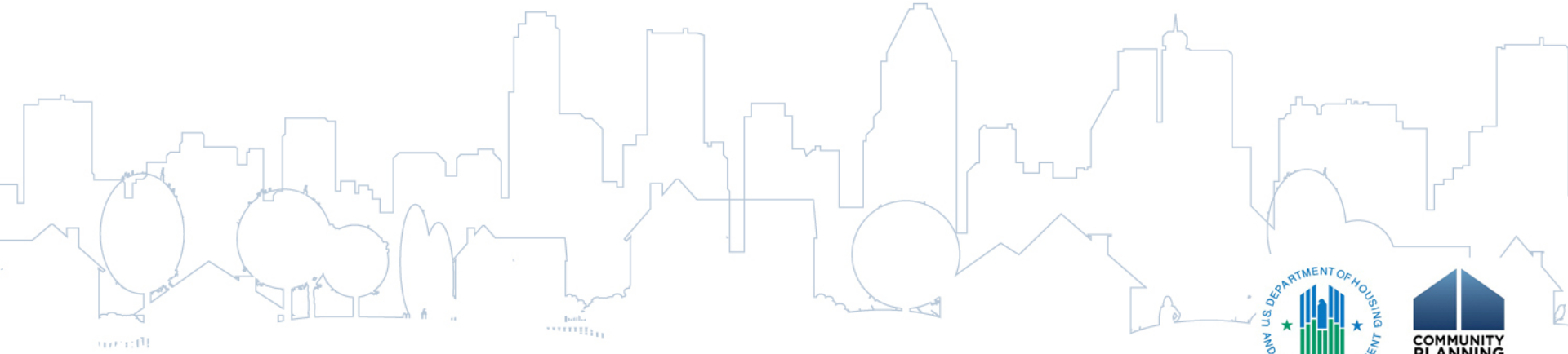
NCDA Region I Spring Meeting
College of the Holy Cross, Worcester
March 28, 2017

Overview

- 2017 Consolidated Plan/Action Plan Submittal
- HOME Grant-Specific Commitment Interim Rule
- Final Rule for Housing Counseling Certification
- CDBG Timeliness Test
- HUD's Place Based Framework
- 2017 Monitoring
- 2 CFR 200 Audit Requirements
- Alignment of Consolidated Plans and Comprehensive Economic Development Strategies
- Staffing Changes

2017 Consolidated Plan/Action Plan Submittals

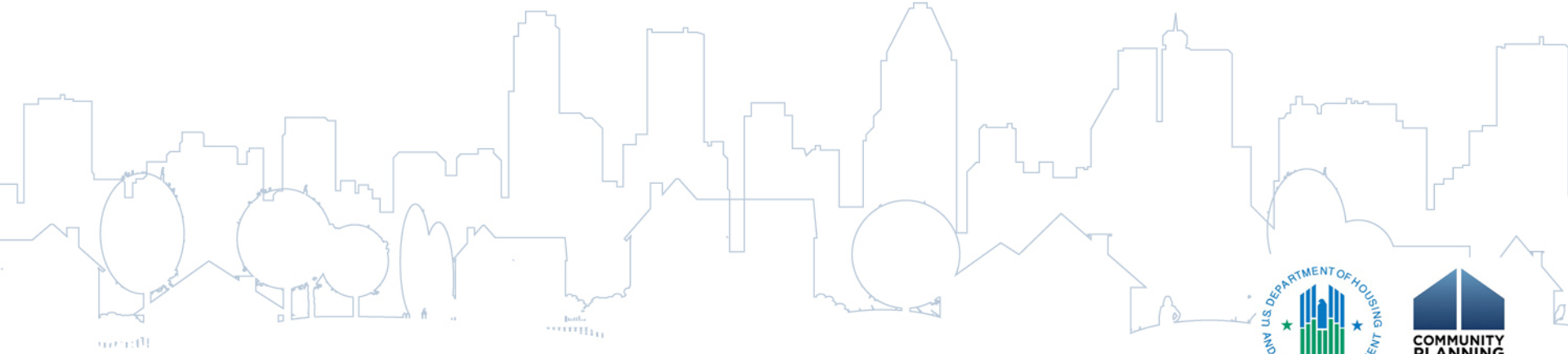


Revised Submission Dates

- NOTICE: CPD-16-18
- Grantees are advised not to submit their consolidated plan/action plan until after FY 2017 allocations have been announced.
- Once announced, each grantee should ensure that the **actual** FY 2017 allocation amounts are reflected in the Form SF-424, the description of resources and objectives, and the description of projects to be undertaken.

Revised Submission Dates (cont.)

- An affected grantee may delay submission of its consolidated plan or action plan until 60 days after the date allocations are announced, or until August 16, 2017, whichever comes first.
- **In no case** may a consolidated plan/action plan be submitted to HUD later than August 16, 2017.



HUD Review of Action Plans

- HUD will disapprove as substantially incomplete any consolidated plan or action plan covering FY 2017 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on the form SF-424, in the description of resources and objectives, and in the description of activities to be undertaken.
- Please double check these amounts before submission!

Plan Development and Citizen Participation

- A grantee may conduct citizen participation on its draft plan (with estimated funding amounts) according to its normal timetable and citizen participation procedures.
- A grantee doing so should make clear that the funding levels shown are estimated amounts.
- In addition, the grantee should include "contingency provision" language in its action plan which explains how it will adjust its proposed plan to match its actual allocation amounts, once actual amounts are known.

Plan Development and Citizen Participation (cont.)

- By including such contingency language, a grantee can avoid the need to make significant revisions to its plan (beyond incorporating the final allocation amounts into the plan).
- The grantee may also avoid the potential need to conduct additional citizen participation for the revised plan.

Pre-award Costs

- Special attention must be paid to situations in which a grantee wishes to incur costs prior to grant award.
- For example, under certain programs, a grantee may want to execute annual renewals of agreements with social service providers in order to prevent interruption of services.

Pre-award Costs (cont.)

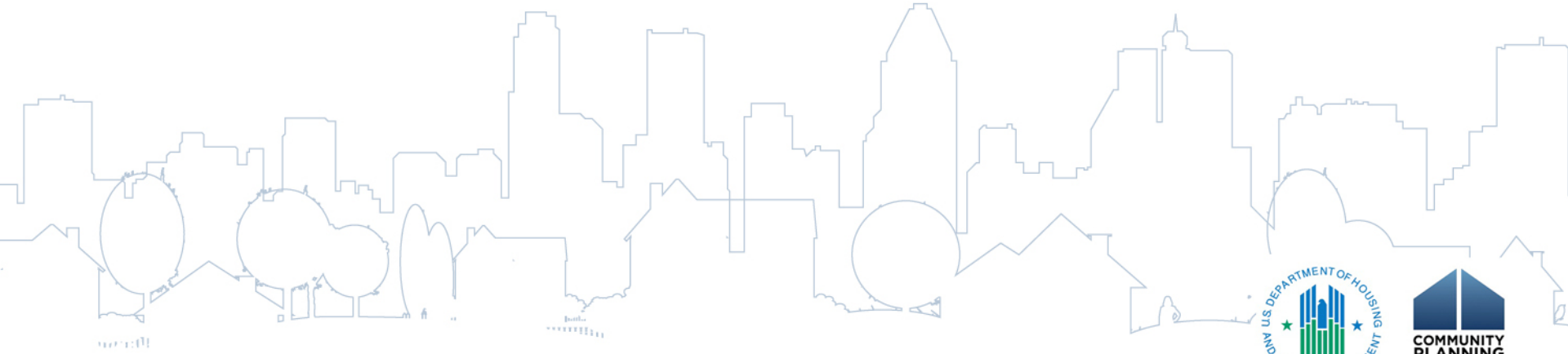
- To minimize additional workload, Notice CPD 16-18 provides HUD approval to incur pre-award costs if and when the grantee completes the following documentation in its local files:
  - The grantee documents that the costs incurred prior to grant award are necessary for efficient and timely performance of the activity in question.
  - The grantee documents that the costs are for eligible activities under the regulations for the applicable funding program;

Pre-award Costs (cont.)

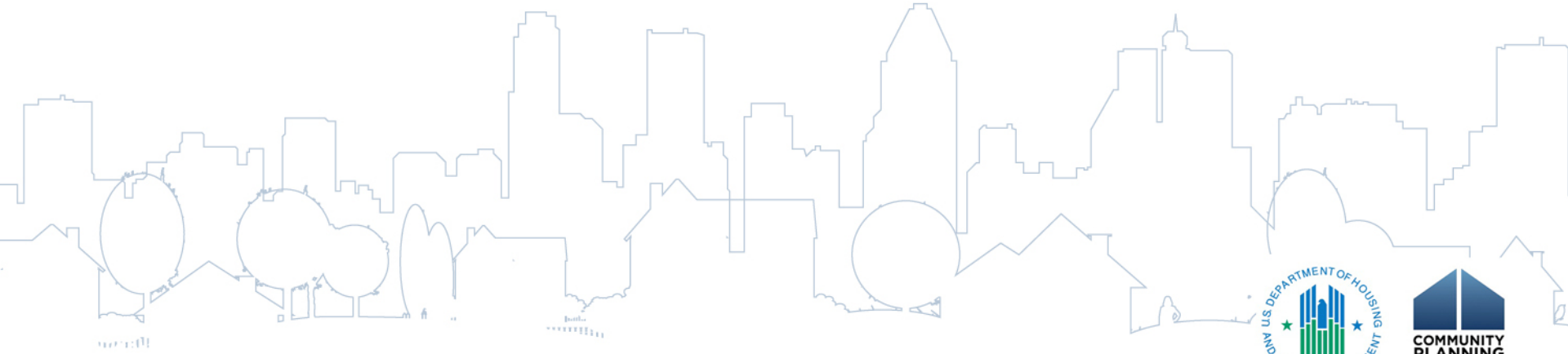
- The grantee documents that the grantee has complied with all other requirements for pre-award costs under the regulations for the applicable funding program;
- The activity for which costs will be incurred is included in a consolidated plan/action plan;
- The grantee documents completion of its citizen participation process by including in its files a written, dated summary of citizen participation comments received on its plan, pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5) as applicable.

Pre-award Costs (cont.)

If the grantee's files contain all other necessary documentation supporting the costs (described below for each program), the date of HUD approval for pre-award costs is the date of the written summary of citizen participation comments, or the grantee's program year start date, whichever is later.



HOME Grant-Specific Commitment Interim Rule



HOME Commitment Requirement

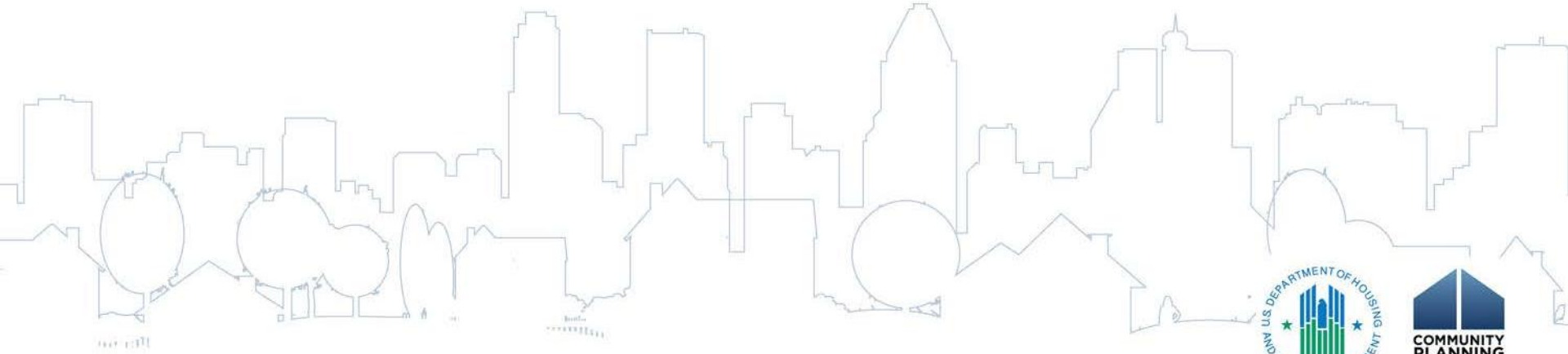
- Section 218(g), NAHA: PJs must commit HOME allocation within 24 months of last day of month in which HUD obligates the grant
- HUD implemented commitment requirement using "cumulative method":

  Total commitments from ALL grants must be equal to or greater than total amount required to be committed through grant year being examined.

CHDO Reservation Requirement

- Section 231, NAHA: PJs must reserve 15% of allocation to CHDOs within 24 months.
- HUD implemented as a "cumulative average":

  HUD measured whether PJ reserved an average of at least 15% of HOME funds to CHDOs from all HOME allocations.



GAO Opinion

- HUD OIG raised concern that cumulative method was not consistent with NAHA.
- Government Accountability Office (GAO) reviewed question and opined that HUD:
  - Must follow plain language reading of statute; and
  - Cease the use of the cumulative method and institute grant-specific commitment test.

HOME Commitment Rule

Interim Rule

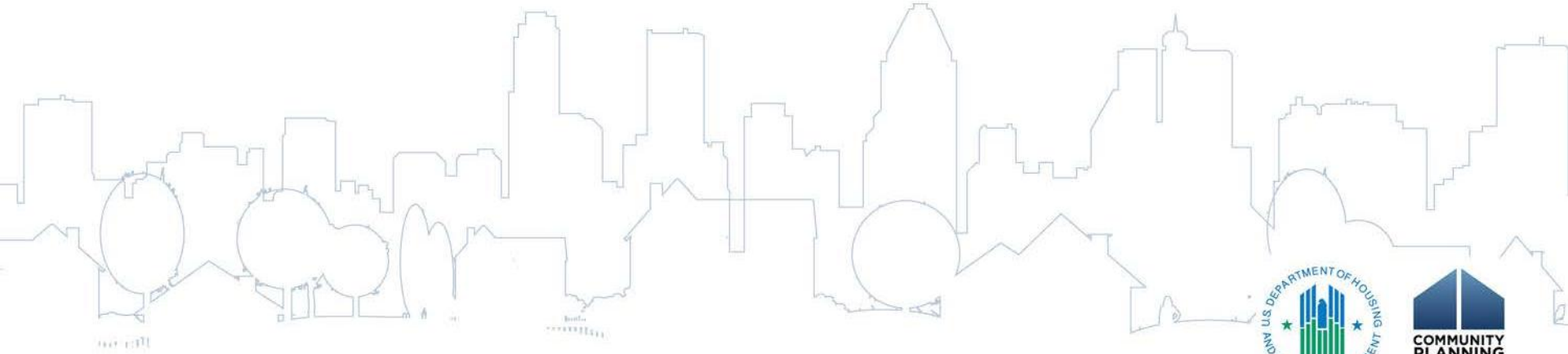
- Published: December 2, 1016
- Effective date: January 3, 2017
- HUD will publish a final rule in the future

HOME Commitment Rule

- Bifurcates method of determining commitment deadline compliance
- FY 2014 and earlier grants – cumulative method/CHDO cumulative average
- FY 2015 and later grants – grant specific

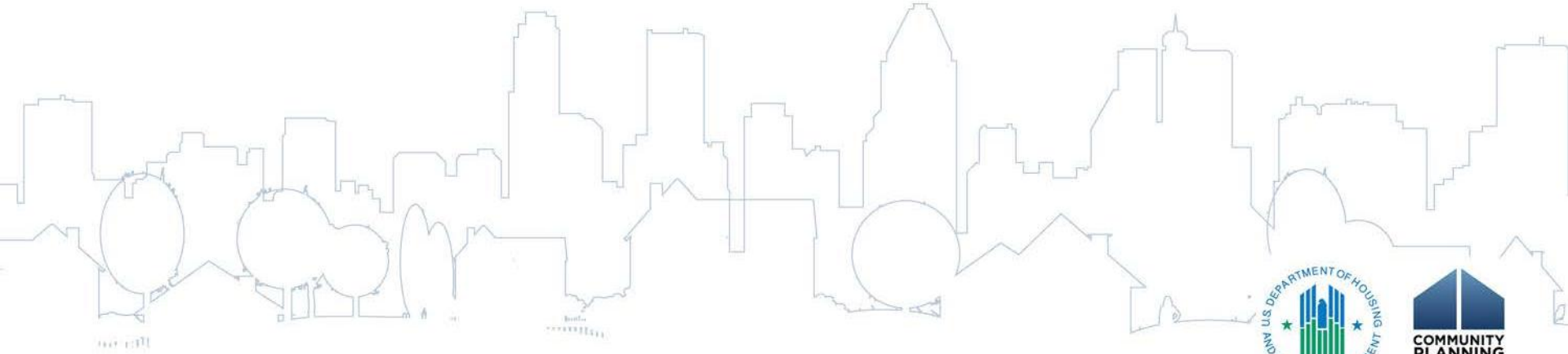
Overview of Other Changes

- Changed requirements for use of Local Account Funds (PI, recaptures, repaid funds)
- Eliminated 5-year expenditure deadline for FY 2015 & later allocations
- Eliminated separate 5-year CDHO expenditure deadline for FY 2014 & earlier allocations



Overview of Other Changes

- Eliminated IDIS auto-cancellation of projects committed for 12 months with no initial disbursement of funds.
- Funds committed to State recipient or subrecipient must be committed to project within 36 months of HUD grant obligation.



Overview of Other Changes

- Definition of commitment (§92.2)
  - 10% admin/planning funds are considered committed at the time HUD obligates PJ's grant unless PJ subsequently reduces AD subfund.
  - CHDO operating or capacity building are considered committed when PJ executes written agreements with provider of services.

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Pre-2015 Deadline Requirements

- Cumulative commitment requirement for FY 1992-2014 HOME allocations
  - Deadline based on obligation date of 2015 HOME grant
- Cumulative average CHDO reservation requirement
  - Deadline based on obligation date of 2015 HOME grant
  - PJ may be able to request a CR subfund reduction based on cumulative average above 15 percent

Pre-2015 Deadline Requirements

- All pre-2015 funds not committed or reserved to CHDOs by deadline will be deobligated.
  - Future grants cannot help meet requirements.
- Pre-2015 funds uncommitted or unreserved to CHDOs after deadline will be deobligated.

Pre-2015 Deadline Requirements

- Cumulative 5-year expenditure requirement
  - Deadlines based on five years after grant obligation

Grant Obligated in:	Expenditure Deadline in:	Includes HOME Grants from:
2012	2017	1992-2012
2013	2018	1992-2013
2014	2019	1992-2014

- CHDO expenditure requirement eliminated for all HOME grants.
  - Added in the July 2013 HOME Final Rule

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Pre-2015 Deadline Requirements

- Deadline Compliance Status Report posted to HUD Exchange will reflect the cumulative deadline requirements.
  - Report will update monthly.
  - IDIS PR-49 **will not** show these requirements.
  - IDIS will continue to commit and disburse these funds using FIFO.

HOME Deadline Compliance Status Report
Requirement Years: 2014 Commitments, 2014 CHDO Reservations, and 2012 Disbursements
As of 11/30/16

(sorted alphabetically by PJ)

PJ		Deadline Date	Orictinal Allocation	Ad ustments++	Requirement Amount	Total C R orD through Deadline Ist		Shortfall Current Status
Killeen	C	10/31/2017	$8,127,959	$0.00	$8,127,959.00	$7,923,979.32	97.49	5203,979.68
	CHDO-C	10131/2017	$8,127,959	$0.00	$1,219,193.85	$1,638,670.33	20.16	50.00
TX	D	9130/2017	57,486,287	$0.00	$7,486,287.00	57,486,287.00	100.00	50.00
King County Consortium	C	6130/2017	$79,617,631	$0.00	$79,617,631.00	$79,581,390.93	99.95	$36,240.07
	CHDO-C	6130/2017	578,566,833	$0.00	511,785,024.95	$16,616,720.83	21.15	50.00
WAD		4/30/2017	574,229,544	$0.00	574,229,544.00	574,229,544.00	100.00	50.00
Kitsap County Consortium	C	6/30/2017	$19,226,838	$0.00	$19,226,838.00	$19,226,838.00	100.00	$0.00
	CHDO-C	6130/2017	$19,011,350	$0.00	$2,851,702.50	$7,318,915.52	38.50	$0.00
WAD		4/30/2017	$18,057,528	$0.00	$18,057,528.00	$18,057,528.00	100.00	$0.00
Knox County	C	7/31/2917	$8,706,146	$11,837.00	$8,694,309.00	58,694,309.00	100.00	$0.00
	CHDO-C	7/31/2017	58,615,051	$0.00	$1,292,257.65	$1,361,819.05	15.81	50.00
TND		6130/2017	$8,112,342	$11,837.00	$8,100,505.00	58,100,505.00	100.00	$0.00
Knoxville	C	7131/2017	$29,538,607	$0.00	$29,538,607.00	529,120,086.70	98.58	$418,520.30
	CHDO-C	7131/2017	$29,209,674	$0.00	$4,381,451.10	$7,421,679.32	25.41	$0.00
TND		7/31/2017	$27,964,152	$0.00	$27,964,152.00	527,964,152.00	100.00	$0.00
La Crosse	C	6/30/2017	$8,062,494	$0.00	$8,062,494.00	$8,048,655.43	99.83	$13, 838.57
	CHDO-C	6/30/2017	$8,062,494	$0.00	$1,209,374.10	$1,684,162.75	20.89	$0.00
WID		6/30/2017	$7,422,551	$0.00	$7,422,551.00	$7,409,064.21	99.82	$13,486.79
Lafayette	C	10/31/2017	$16,417,251	$0.00	$16,417,251.00	$16,400,120.44	99.90	$17,130.56
	CHDO-C	10/31/2017	$16,269,606	$229,214.00	$2,211,226.90	$4,497,678.18	27.64	$0.00
LAD		10/31/2017	$15,447,588	$0.00	$15,447,588.00	$15,442,792.33	99.97	$4,795.67

NOTE: Any ADDI allocations received through FY2008 are reflected in the Original Allocation and respective Requirements.

- C. Commitments, **CHDO-C: CHDO Commitments, D: Disbursements**
- **+Adjustments** could **include CHDO reallocations,** grant reductions, deobligations, recapture of expired funds, or waivers of deadline requirements **due** to Presidentially-declared disasters.
- PJ did not receive an allocation until after 2014. Therefore, it has no amount subject to the **Pe** 2016 commitment or CHDO reservation deadline.
- PJ did not receive an allocation until after 2011. Therefore, it has no amount subject to the **Pe** 2016 disbursement deadline.

41 Due to CHDO deobligation or waiver, PJ could have met its cumulative CHDO reservation requirement with a percentage less than 15%.

Source: Data entered by HOME Participating Jurisdictions into HUD's Integrated Disbursement and Information System (IDIS)

Grant Specific Commitments

- Grant-specific requirement for FY 2015 and subsequent years' HOME allocations
- Entire grant amount must be committed within two years.
  - Deadline based on obligation date of the grant
  - Previous and subsequent years' grants cannot help to meet requirements.

Grant Specific Commitments

- Changes to commitment definition at §92.2
  - Administrative and planning costs
  - Written agreement with:
    - State recipient or subrecipient for affordable housing, downpayment assistance or TBRA
    - CHDO for CHDO operating
    - CHDO for predevelopment loans
    - Organization for CHDO for capacity building
  - Written agreement committing funds to a specific local project (including CHDO set aside projects)

Grant Specific CHDO Reservation

- Beginning with 2015 HOME grants
- 15 percent of each grant amount must be reserved to CHDO within 2 years
  - Committed to specific CHDO grants
  - Based on obligation date of the grant
- Written agreement committing funds to a specific local CHDO project
- HUD will no longer reduce CR subfunds upon request.

SU Commitment Deadline

- Funds committed to a State recipient or subrecipient before the 24-month commitment requirement must be committed to a specific local project with 36 months.
  - Deadline based on obligation date of the grant
    - 1 year after the 24-month deadline
  - Written agreement committing funds to a specific local project
  - Funds in SU subgrants in place at 24 months must be committed before 36 months.

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Grant Specific Expenditures

- Five-year expenditure requirement eliminated for FY 2015 and subsequent allocations
- Five-year CHDO expenditure requirement eliminated for all HOME allocations
- National Defense Authorization Act applies
  - Grants expire 5 years after period of availability for obligation
    - Pre-2015 = 8 years (3+5)
    - 2015, 2016 = 9 years (4+5)
    - FYI – 2010 grant expires at end of FY 2017

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Grant Specific Deadline Requirements

- Commitment and CHDO reservation requirements
  - Uncommitted funds deobligated in 24 month requirement is not met
  - Opportunity for PJs to provide documentation of commitments/CHDO reservations not in IDIS
  - Funds becoming uncommitted after 24 months also deobligated
- Expiring grant funds
  - Recaptured by U.S. Treasury after expiration

Grant Specific Deadline Requirements

- IDIS release 11.13 deployed on March 24, 2017, enforces grant specific HOME deadline requirements
  - 24-month commitment requirement
  - 24-month CHDO reservation requirement
  - 36-month SU commitment requirement
  - NDAA expiration of funds
- HOME Deadline Compliance screen in IDIS
  - Link from Grant screen

Grant Specific Deadline Requirements

- Grant Specific Deadline Compliance Status Report posted on HUD Exchange for each year's grant will reflect the grant specific deadline requirements.
  - Posted report will be updated monthly.
  - IDIS PR49 will have a grant specific version.
  - PJ will use grant based accounting to commit and disburse these funds.

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Requirement Years: 2015

HOME Deadline Compliance Status Report

Commitments, 2015 CHDO and 2015 Disbursements Reservations, As Of 11/30/2016

(sorted alphabetically by PJ)

PJ	+ -	Deadline Date	Original Allocation	Ad-ustments++	Requirement Amount	Total C R.orD through Deadline,	%	Shortfall Current Status
Charlottesville	C	7/3112017	$455,749.00	$0.00	$455,749.00	$189,061.33	41.48	$266,687.67
Consortium	CHDO-C	7/31[2017	$455,749.00	$0.00	$68,362.35	$0.00	0.00	$68,362.35
VA	SU	713112018	$0.00	$0.00	$0.00	$0.00	0.00	$0.00
	0	9/3012023	$455,749.00	$0.00	$455,749.00	$121,098.00	26.57	$334,651.00
Chattanooga	C	7/3112017	$665,430.00	$0.00	$665,430.00	$534,965.50	80.39	$130,464.50
	C H DO- C	7/3112017	$665,430.00	$0.00	$99,814.50	30.00	0.00	$99,814.50
TN	SU	713112018	30.00	$0.00	$0.00	30.00	0.00	$0.00
	D	9130/2023	$665,430.00	$0.00	$665,430.00	$73,764.00	11.09	$591,666.00
Chesapeake	C	9/30/2017	$361,113.00	$0.00	$361,113.00	$261,063.30	72.29	$100,049.70
	CHDO-C	9/3012017	$361,113.00	$0.00	$54,166.95	$0.00	0.00	$54,166.95
VA	SU	9/30/2018	$0.00	$0.00	$0.00	$0.00	0.00	$0.00
	D	9/30/2023	$361,113.00	$0.00	$361,113.00	$46,426.00	12.86	$314,687.00
Chester	C	7/31/2017	$231,438.00	$0.00	$231,438.00	334,714.80	15.00	$196,723.20
	CHDO-C	7/3112017	$231,438.00	$0.00	$34,715.70	$0.00	0.00	$34,715.70
PA	SU	7/3112018	$0.00	$0.00	$0.00	$0.00	0.00	$0.00
	0	9/3012023	$231,438.00	$0.00	$231,438.00	$34,715.00	15.00	$196,723.00
Chester county	C	7/3112017	$749,710.00	$0.00	$749,710.00	$326,529.25	43.55	$423,180.75
	CHDO-C	7/3112017	$749,710.00	$0.00	$112,456.50	$0.00	0.00	$112,456.50
PA	SU	7/3112018	$200,000.00	30.00	$200,000.00	$100,000.00	50.00	$100,000.00
	D	9/3012023	$749,710.00	$0.00	$749,710.00	$270,355.00	36.06	$479,355.00

C: Commitments, CHDO-C: CHDO Reservations, D: Disbursements

[14]Adjustments could include CHDO reallocations, grant reductions, deobligations, recapture of expired funds, or waivers of deadline requirements due to Presidentially-declared disasters. Due to CHDO deobligation or waiver, PJ could have met its cumulative CHDO reservation requirement with a percentage less than 15%.

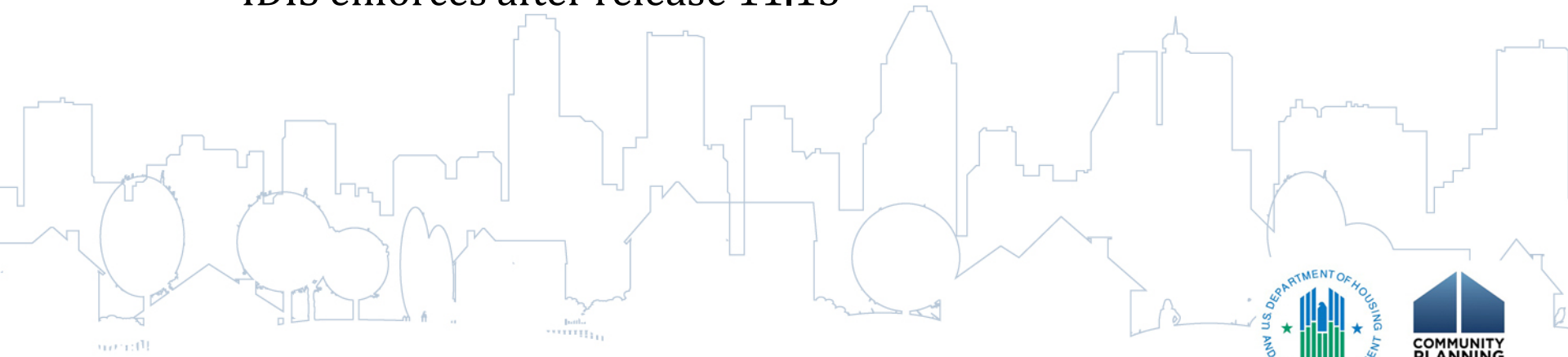
Source: Data entered by HOME Participating Jurisdictions into HUD's Integrated Disbursement and Information System (IRIS}

Other Changes – Local Account Funds

- Beginning with 2017 annual action plan:
  - Must include local account funds received during the program year in the following year's annual action plan.
- Applies to all funds in the local account, including:
  - Program income (PI)
  - Recaptured funds (HP)
  - Repayment to the local account (IU)

Local Account Funds (cont.)

- Commit and disburse for the same HOME activity – grant based accounting
  - Instead of disbursing first for any activity
- Commit to activities before Treasury account funds (i.e., the PJ's grant)
  - Except for CHDO set aside funds (CR, CL)
  - IDIS enforces after release 11.13



Local Account Funds (cont.)

- No longer have to be disbursed before Treasury account funds
  - Unless committed to an activity with Treasury account funds
  - IDIS enforces after release 11.13
- PJ starts accumulating and planning for local account funds now!
  - Most are currently in 2016 program year
  - Action plans not due until allocations announced

Local Account Funds (cont.)

- Commitment requirement 2 years after the start of the program year
  - E.g., local account funds received in program year 2016 must be:
    - Included in the FY 2017 annual action plan
    - Committed before 2017 grant funds
    - Committed by commitment deadline in 2019
    - Disbursed before grant funds if committed to the same activity

Other Changes – Auto-cancellation

- Removed §92.502(b)(2)
  - Auto cancellation of activities committed in the system for 12 months without an initial disbursement of funds
- IDIS auto-cancellation feature – including flags – will be removed in IDIS release 11.13.
  - Early February 2017
- PR21 HOME Auto Cancel Report will include no new activities after release 11.13.

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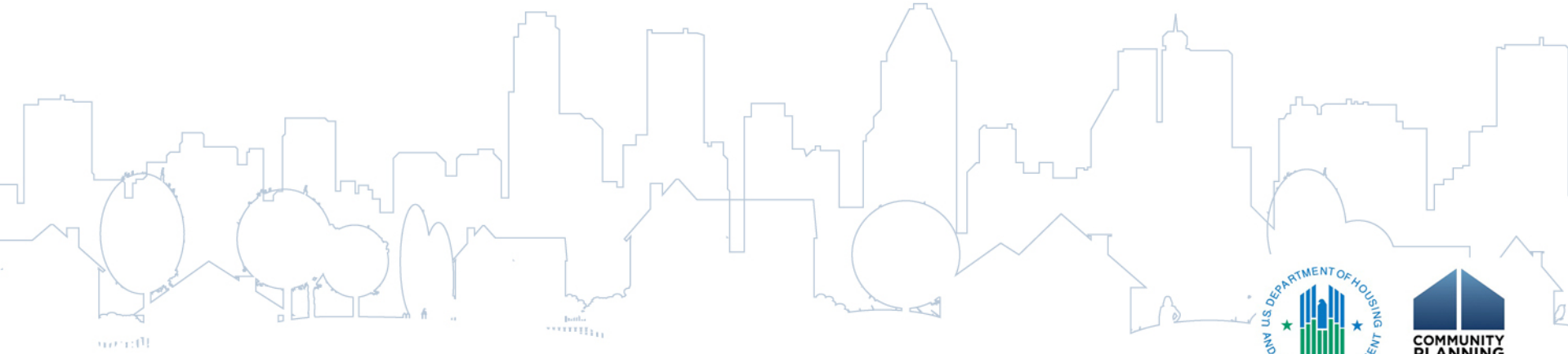
Final Rule for Housing Counseling Certification



What is Housing Counseling?

- HUD Standards
  - In person, phone, internet are acceptable as long as client and counselor can have an individual dialogue
  - Guidance and advice are tailored to client's needs
  - Includes creating a client budget, financial analysis, an action plan, and referrals to relevant resources such as down payment assistance programs or legal services

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Final Rule on Housing Counseling Certification for CPD Stakeholders

- Final Rule was published on December 14, 2016.
- Final compliance date for housing counselor is 36 months after examination becomes available.
- HUD will publish a Federal Register notice to announce the start of testing.

Final Rule on Housing Counseling Certification for CPD Stakeholders

- All housing counseling provided under or in connection with all HUD programs must be performed by a HUD certified housing counselor.
- A HUD certified housing counselor is a housing counselor who has passed the HUD Certification examination and works for a HUD-approved housing counseling agency.

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CDBG Timeliness Test

What is CDBG Timeliness?

- "Timeliness" refers to the statutory requirement that HUD annually determines whether each CDBG grantee is carrying out its program in a timely manner.
- The grantee must have a balance no greater 1.5 times its annual grant remaining in the line-of-credit, 60 days prior to the end of the program year. (CDBG Regulation - 24 CFR 570.902)

Unadjusted vs. Adjusted Timeliness Ratios

- Two Timeliness Tests - 24 CFR 570.902(a) (1) and (2)
- PR56 Current CDBG Timeliness Report
  - Unadjusted Ratio – only the grant balance in LOCCS
  - Adjusted Ratio – includes grant balances and program income, including the balance in revolving loan funds.

PR56: CDBG Timeliness Report

Current CDBG Timeliness Report

Grantee : BATON ROUGE, LA

PGM YEAR	PGM YEAR START DATE	TIMELINESS TEST DATE	CDBG GRANT AMT	--- LETTER OF CREDIT BALANCE --- UNADJUSTED	ADJUSTED FOR PI	DRAW RATIO UNADJ	ADJ	MINIMUM DISBURSEMENT TO MEET TEST UNADJUSTED	ADJUSTED
2015	10-01-15	08-02-16	2,912,648.00	3,553,920.65	3,719,766.36	1.22	1.28		
2016	10-01-16	08-02-17	2,867,265.00	5,561,598.81	5,688,238.09	1.94	1.98	1,260,701	1,387,341

More Grantees Untimely Due to Program Income

- In the past, HQ has generally identified grantees as untimely based on the unexpended grant funds in the grantee's line-of-credit (Treasury account), even if the adjusted (grant balance plus PI) exceeded the 1.5 ratio.
- With the increasing number of CDBG grantees with larger program income balances, this is now a concern.

Program Income from Revolving Loan Funds

- Loan repayments to RLF's are considered program income which is counted toward the timeliness ratio of 1.5.
- In order to ensure PI from RLF's is not making a CDBG grantee untimely, it is crucial that the funds are "active" or revolving.
- If RLF has a high balance, grantee may move funds out to use for other CDBG projects.

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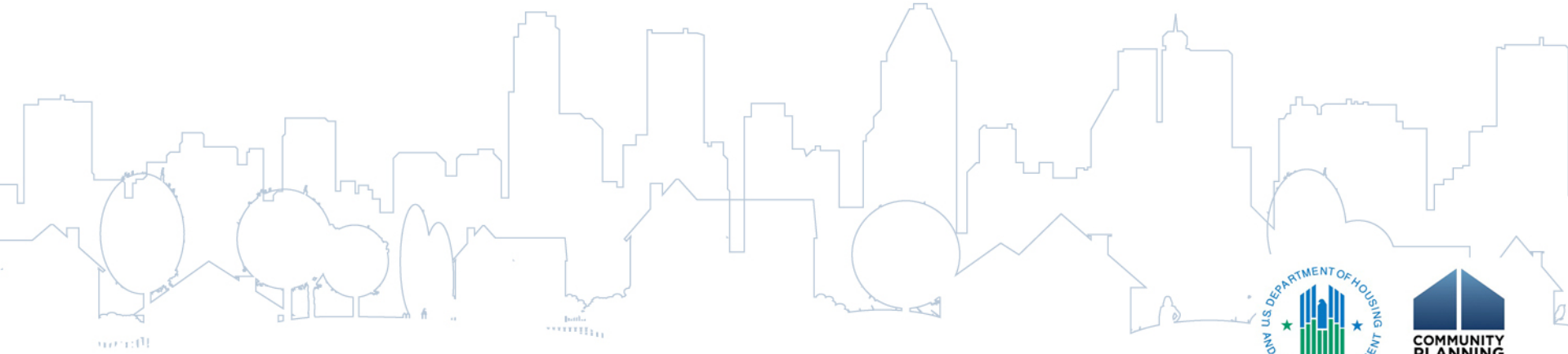
Return of Excess CDBG Program Income



Overview

- Per 24 CFR 570.504(b)(iii), Grantees:
  - At the end of each program year, may <u>not</u> have program income on hand in excess of 1/12th of the most recent grant.
  - Amounts over the 1/12th threshold "shall be remitted to HUD".
  - Exceptions:
    - Funds needed for immediate cash needs
    - Cash balances of revolving loan funds
    - Cash balances from a lump-sum drawdown
    - Cash or investments held for Section 108 loan guarantee security needs

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Returning Excess Program Income

- To Return Excess Program Income, the grantee must complete a wire transfer with:
  - Bank Name and Address
  - ABA Routing Number & Account Code
  - Grant Number, Agency Location Code, & Name
- Detailed Information is available at your CPD Field Office
- Should <u>not</u> be returned to the line-of-credit

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Reporting Use of Excess Income

- Excess Program Income:
  - Is reported in the same manner as regular program income, except the location of accounts where the money is held.
- Any excess program income returned [24 CFR 570.504(b)(iii)] must be used by the grantee <u>before</u> drawing from a Line of Credit.

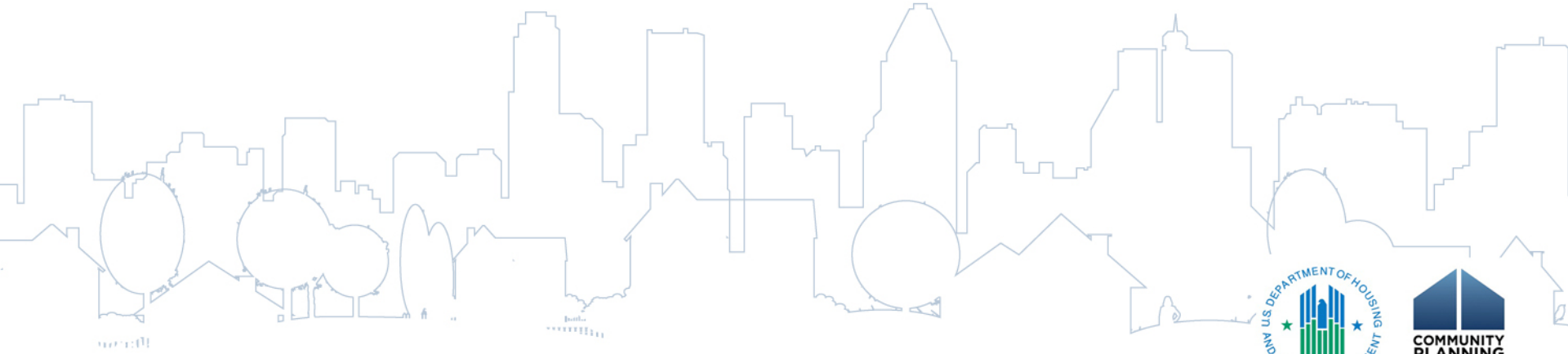
Drawing Returned Excess Income

- Grantee Official authorized to approve drawdowns, must:
  - Request via e-mail to designated Field Office Staff, with a completed SF-1034 attached
  - Field Office Staff will review and advise of approval or disapproval
  - SF-1034 (if approved) will be forwarded to CFO Accounting by Field Office Staff
  - CFO Accounting will process via wire transfer

Reporting Use of Excess Income

- No revision should be made to the original receipt in IDIS, and no additional receipt should be made.
- If excess program income was not receipted:
  - Funds should be receipted at the time the draw is made
  - The date of receipt will not reflect the date program income was actually received
  - Adjustments will need to be made to PR 26, Part IV & Part V

HUD's Place Based Operational Model



Key Points of Operational Model

- Building on existing interagency best practices, HUD is implementing a series of operational initiatives that enable staff to more easily and holistically respond to the needs of communities.
- The goal is to enhance the impact of HUD's programs and better support staff to work collaboratively.

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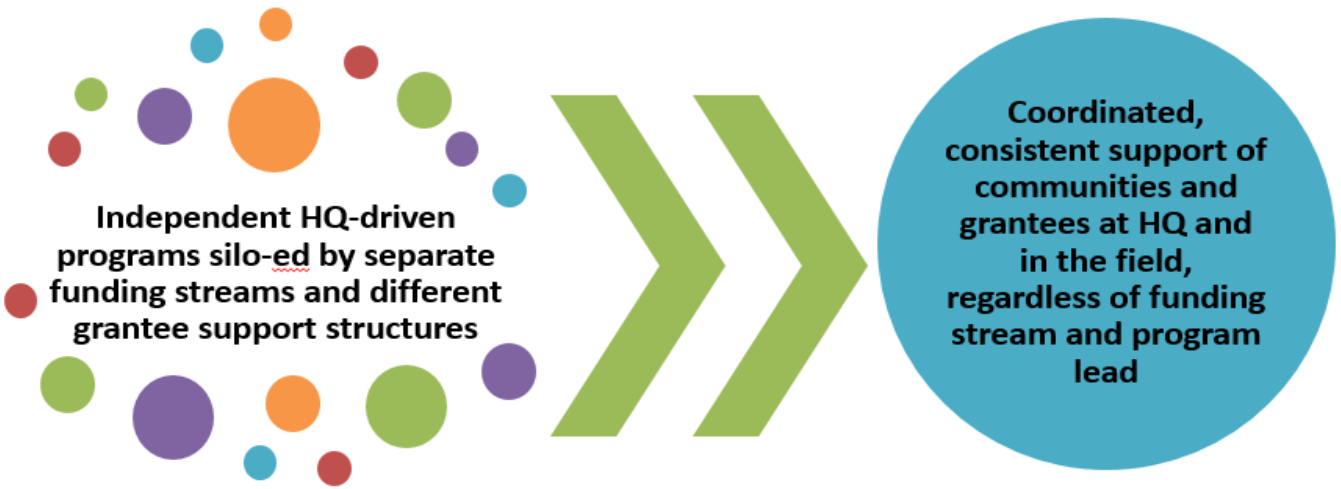
Key Points of Operational Model

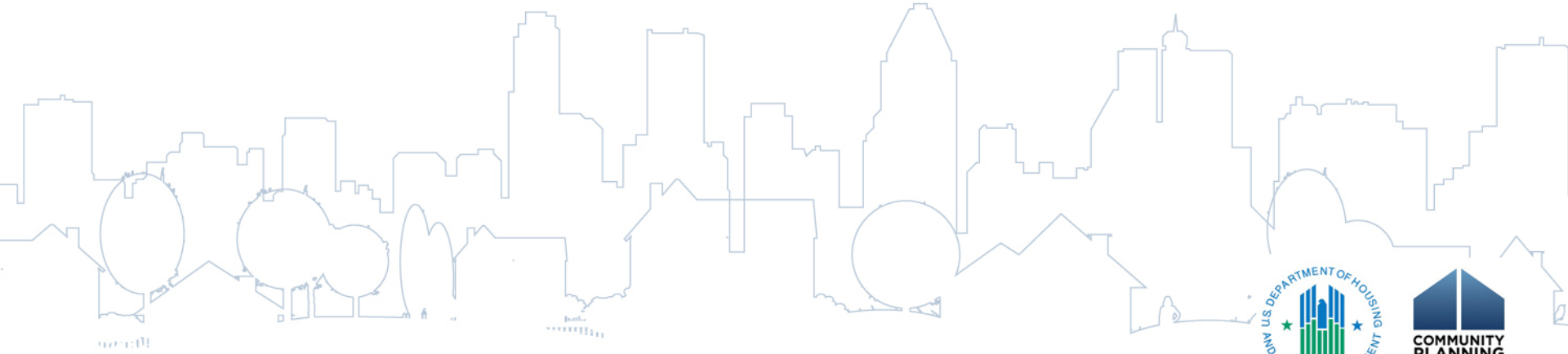
What is Place-Based?



Program-Focused Support

Community-Focused Support

2017 Monitoring



2017 Monitoring

- Our 2017 risk analysis is complete and monitoring has begun.
- REV-7 changes to the *CPD Monitoring Handbook 6509.2* are available on-line.
- Tips for a Successful Monitoring:
  - Review the monitoring exhibits listed in our entrance letter.
  - Have information needed to answer questions in the exhibits readily available for HUD staff to review.

We need your cooperation for the monitoring to go smoothly and to be completed in a timely fashion.

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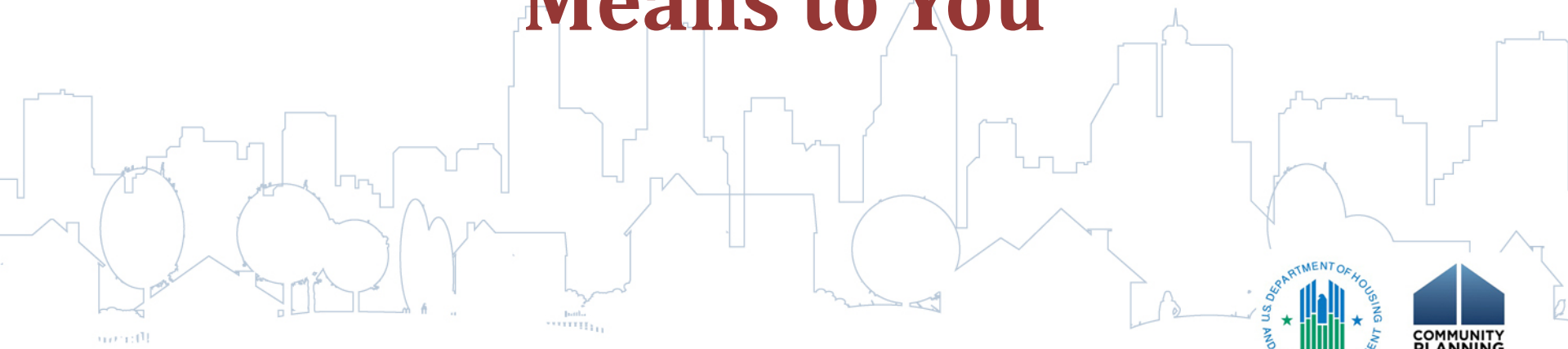
2 CFR 200 Audit Requirements

Peer Review and What it Means to You



What is Peer Review?

- Mandated review of an audit firm's internal controls and best practices.
- Required to take place at least every three years, but can occur more frequently.
- Peer review teams are assembled to assess each audit firm's internal controls and other factors including adherence to Generally Accepted Government Auditing Standards (GAGAS).

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Regulatory Matters

- Per COFAR §200.509 grantee/participating jurisdiction who is subject to audit requirements:

  MUST request the peer review, and the audit firm **MUST** comply with the request.

- If you are preparing an RFP for audit services, request a copy of their peer review.

Peer Review Outcomes

- Three possible peer review outcomes:
  - Pass
  - Pass with deficiencies
  - Fail
- Pass:
  - Auditing practice has been suitably designed
  - Reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects

Peer Review Outcomes (cont.)

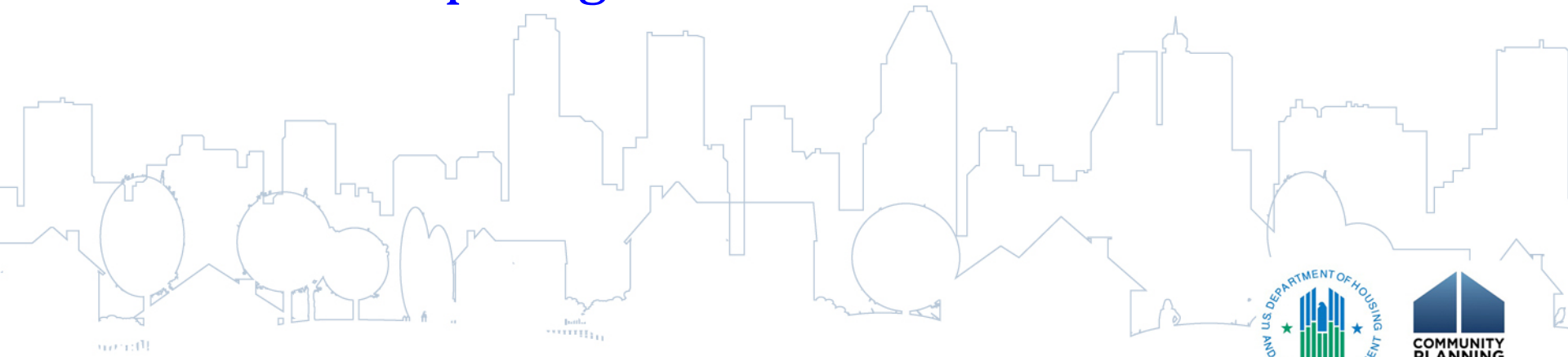
- **Pass with Deficiencies:**
  - Deficiencies related to the firm's design of and compliance with its system of quality control
  - Less than reasonable assurance of performing and/or reporting in conformity with applicable professional standards

Peer Review Outcomes (cont.)

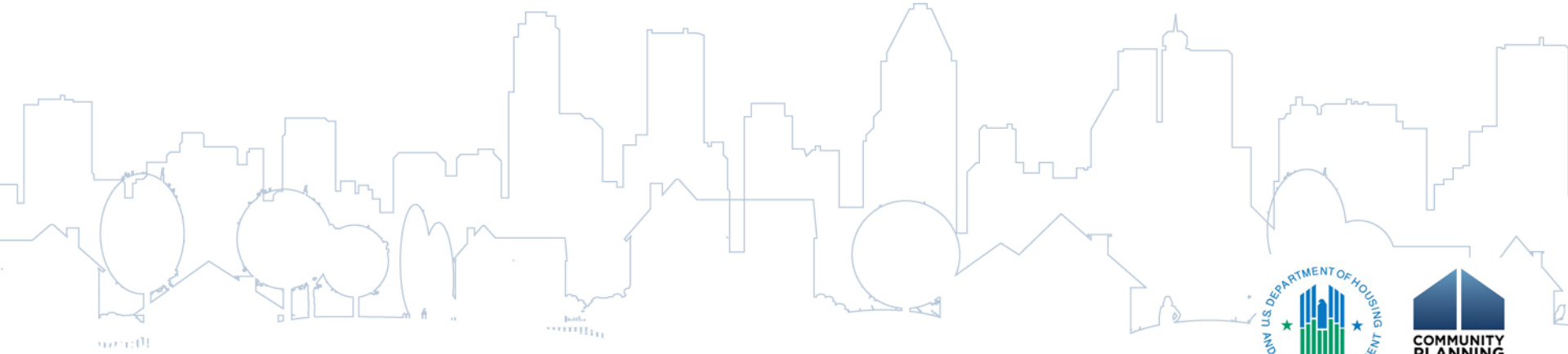
- **Fail:**
  - Firm's system of quality control is <u>not</u> suitably designed to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards
  - Firm has <u>not</u> complied with its system of quality control to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards

For More Information…

- More information on Peer Review can be found at:
  - www.gao.gov
  - www.aicpa.org



Aligning Consolidated Plans and Comprehensive Economic Development Strategies



Aligning Planning Efforts

- HUD and the Economic Development Administration (EDA) are working together to describe how grantees can better coordinate their local planning efforts so that planning documents prepared for one agency can also be submitted to the other agency.
  - MOU executed in October 2016
  - Inter-agency work group established
  - Currently in early planning stages
  - All outcomes will be voluntary. No new requirements.

Comprehensive Economic Development Strategy (CEDS)

CEDS	Con Plan
EDA's strategic planning document	✓
Must be updated at least every 5 years	✓
Prerequisite to funding	✓
Requires stakeholder involvement	✓
Assesses area's economic needs	✓
Includes a market analysis	✓
Has an action plan component	✓
Looks for measureable results	✓

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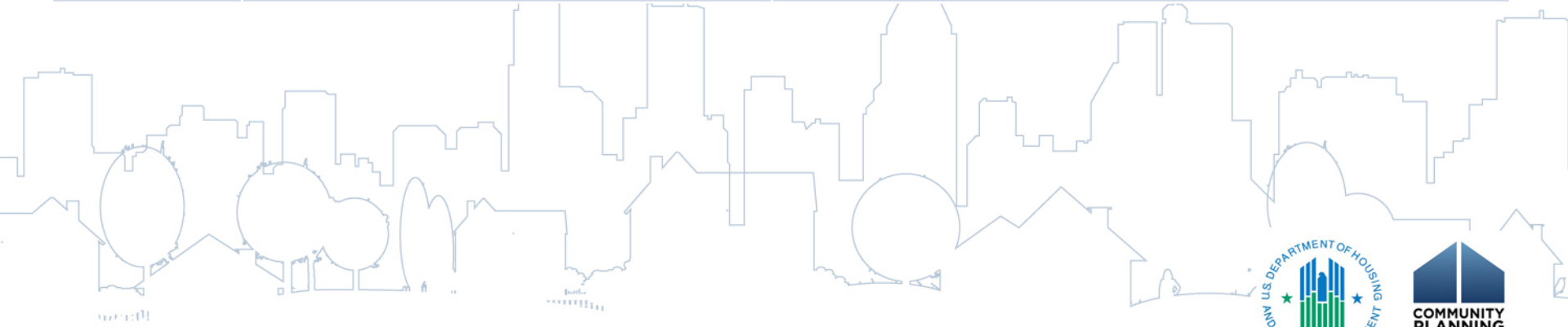
Differences in Plans

	Con Plan	CEDS
Format	System Driven Template	Paper Driven – Flexible Template
	Limited Narrative	Ability to “Tell the story”
Data	Pre-populated data elements	Requires own data
Audience	Jurisdictional	Regional
Funding	Focus on low-mod	Focus on economic investment



Next Steps for HUD & EDA

- HUD & EDA are jointly developing guidance on:
- Aligning local investments with regional goals
- Enhancing the citizen participation and consultation process
- How to merge con plan cycles with CEDS plan cycles
- Additional information each document needs to meet both agencies' requirements
- Benefits and hazards of combining funding sources

COMMUNITY PLANNING & DEVELOPMENT

Staffing Changes

Economic Development

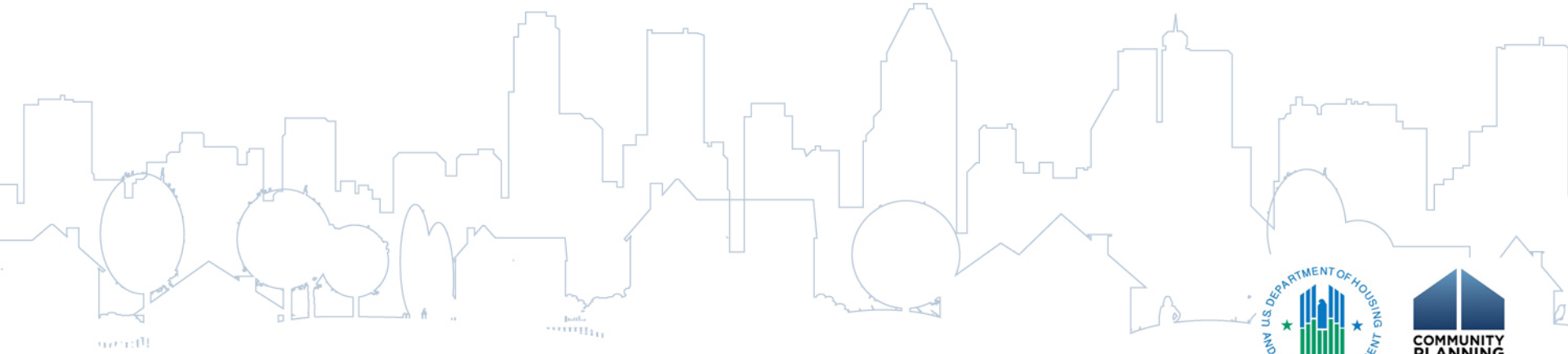
- After many years of service, Cedric Kam, Region I's Economic Development Specialist, recently retired.
- CPD Representative Adam Ploetz will be assuming Cedric's economic development workload and will be the point of contact for Region I 108 loan program.
- Consider Adam as a resource for technical assistance related to utilizing CDBG for economic development.

Staffing Changes

Relocation

- In December, 2017, Nancy Scoppa joined the Region I CPD team as our Relocation Specialist.
- Nancy has several years of experience with acquisition and relocation and most recently worked for the Massachusetts Department of Transportation.

Questions?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