



# HUD CoC Contracting

GRANTEE RESPONSIBILITIES

# Executing HUD Contract

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## 1. Formal Notification of Award

## 2. Satisfying Conditions for Grant Execution

- Match documentation
- Site control
- Environmental Reviews
- Code of Conduct
- Project Feasibility

## 3. HUD Contract Execution

Matching funds must be documented prior to contract execution

In the APR, grantee will identify the amount of resources committed as match

In monitoring, grantee must be able to demonstrate that matching funds were received and expended on eligible program activities during grant term

- If match is provided in-kind, must document that services/goods were actually received by participants

# Match

# Meeting Match Requirements

At grant execution, recipients must demonstrate they have sufficient resources (cash and in-kind) to meet requirement

- If a cash match, on agency letterhead specify amount of cash, date it will be available, and grant/project name match is applied to
- If volunteers, time is documented (sign-in sheets) so that time volunteered can be quantified and volunteer activity must be valued at standard rate for industry
- If in-kind goods, on agency letterhead, description of goods, method used to determine value, and date goods will be made available
- If in-kind services, MOU between recipient and providing organization, specify the services to be provided, dates services will be provided, professions/qualifications of those providing services, hourly cost of provider, point in time number of clients being served and number over length of contract, and services valued consistently with industry practices



# Environmental Review

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An Environmental Review Record (ERR) needs to be completed for all projects before grant funds are spent

What level of ERR depends on the type of activity in grant

Depending on the level of the ERR, it may require the local jurisdiction to certify – if they do not, reach out to HUD Field Office





# Environmental Review

Responsible entity – local jurisdiction where building or activity will occur

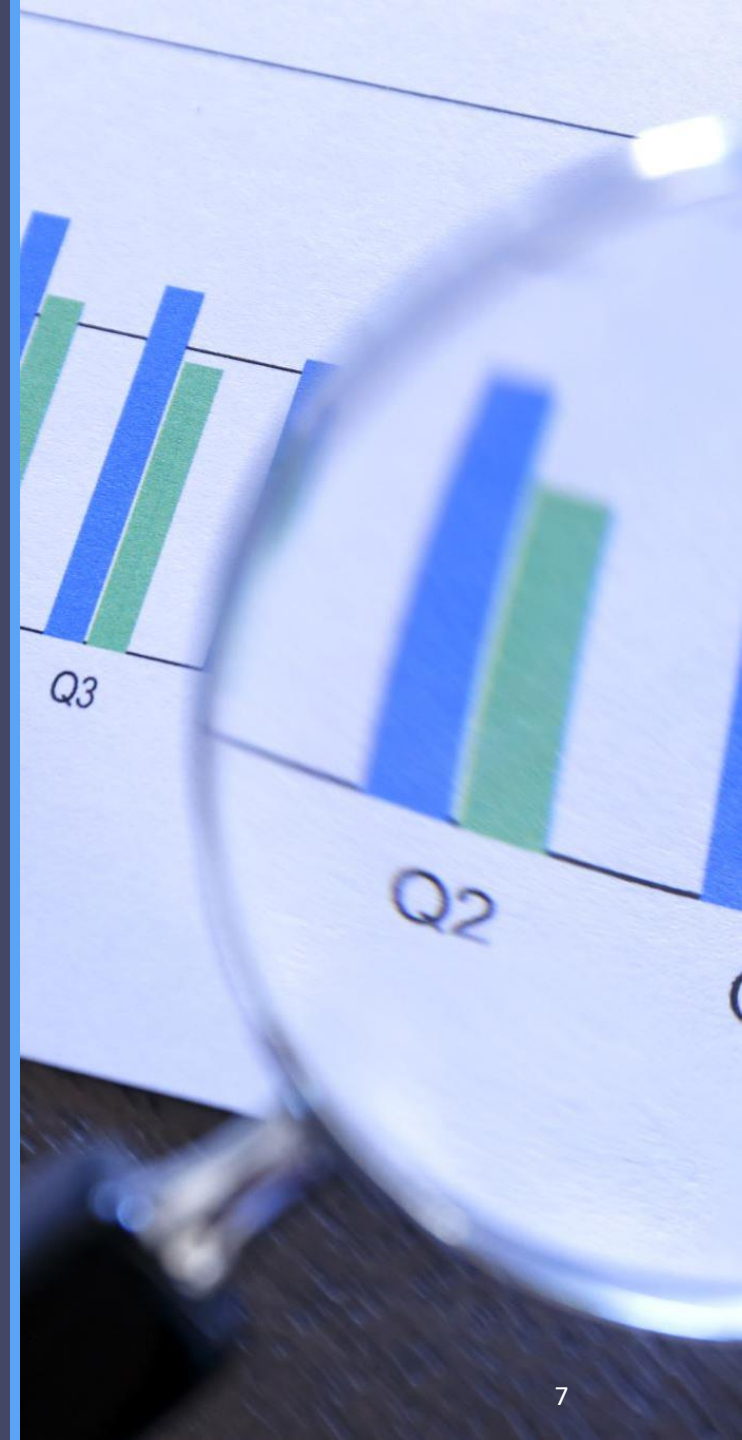
Level of review depends on type of activity:

- Exempt – soft costs excluding rental assistance and leasing – use National ERR completed by HUD (HMIS, CE, Services only)
- CENST – tenant based rental assistance and leasing – use Statewide ERR completed by your local field office
- CEST – rental assistance and leasing where participant does not choose unit – use "Limited Scope" ERR, sign as “Preparer”, and send to local jurisdiction to sign as “Certify”
- EA – hard costs – complete Part 58 Environmental Assessment on paper

Must be completed every 5 years

# Demonstrating Financial Feasibility – required for contract execution

- Review of audit/financial information to confirm capacity
- Review of budget line items – quantity and descriptions, wages and FTEs
- If portions of the project are addressed with leveraged resources, documentation that resources are in place



# Code of Conduct

All federal award recipients other than states must have a code of conduct for procurements that meets all requirements

HUD maintains a [Code of Conduct e-library](#) – all recipients should confirm their code of conduct is on file with HUD

## Codes of Conduct:

- Prohibits real and apparent conflicts of interest
- Prohibits solicitation of gifts or gratuities
- Provide for administrative and disciplinary actions for violations

See [HUD Code of Conduct](#) for detailed information







**On-line secure system  
for drawing down  
contract funds**



For new contracts  
drawdowns in e-snaps  
will trigger contract start  
date



Drawdowns must be at  
least quarterly –  
accounts are suspended  
if not accessed every 90  
days



Funds must be obligated  
during the contract term  
and expended (for  
activities during the  
contract term) no later  
than 90 days after  
contract execution

**Must submit HUD forms to  
be able to gain access to  
system**

**Must create security  
questions and PIN**

# E-LOCCS Drawdowns

## Annual Performance Report (APR)

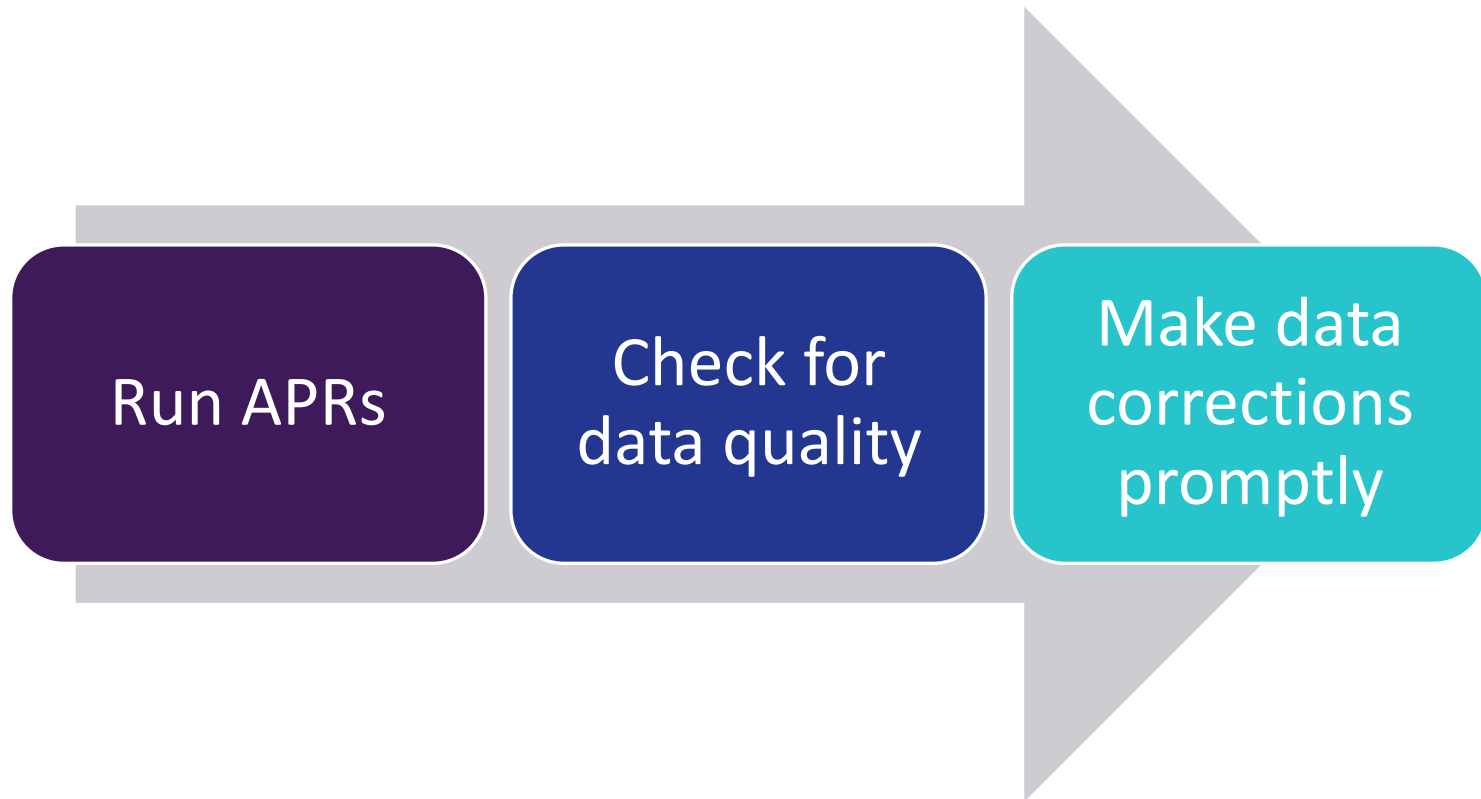
Must be submitted in SAGE  
within 90 days of contract end  
– a web-based reporting portal

Failure to submit will result in  
an inability to draw down  
funds for current grant

APRs' data is based on what  
has been input to HMIS

# Annual Performance Report (APR)

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# Monitoring

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HUD may monitor CoC grants at any time

- HUD uses a risk assessment to prioritize monitoring
- Monitoring allows HUD and recipients to assess performance, compliance, and program/project progress
- If HUD finds non-compliance, it may issue Findings. Grantees must clear all Findings to continue to receive funding/drawdown.

If a recipient has subrecipients, it must monitor them

CoC lead agencies are expected to routinely monitor CoC grantees



# CPD Monitoring Guide

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If informed that HUD will be monitoring your organization:

- HUD will specify grant(s) and program year(s)
- HUD will follow questions specified in [CPD Monitoring Guide](#)
- HUD will specify which aspects of the grant that will be monitored



# Poll – What Happens if an APR is not submitted on time

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- The grantee will be debarred from future contracts with HUD
- All assisted participants will have to immediately vacate their housing
- Grantees will not be able to draw down funds on their current contract
- Grantees must obtain a letter from their Congressional Representative providing a waiver from the APR requirement

# Grant Amendments

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## Significant changes require HUD Field Office Approval

- Change of recipient
- Change of project site
- A change of more than 10% of the originating budget line
- A permanent change of subpopulation served
- A permanent reduction in the number of units funded under grant

## Minor changes do not substantially affect grant implementation

- A shift of less than 10% of the originating budget line
  - *Do not require HUD approval, but HUD **must** be notified*
  - Cumulative over contract term
- Budget changes must be reflected in LOCCS to draw down funds

# Grant Renewals

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HUD CoC grants are typically for one year

Grants are renewed through the annual competitive process

- CoCs set standards for project performance
- CoCs score renewal grants
- Lower scoring grants may either be ranked in Tier 2 or reallocated
- Low scoring grants may be required to develop performance improvement plan
- Grants not fully expending funds may be partially reallocated

In addition to competing in local competition, grantees must submit renewal grant application in e-snaps

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As part of the annual competition, CoCs can reduce or eliminate funded grants and use the reduced or eliminated funding to support new allowable projects

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Grantees that under-spend their contracts are at risk of having contracts reduced – less than 75% expended, reduction of 10%; less than 50%, reduction of 25%

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Grantees with poor performance may not be allowed to renew and the funding reallocated

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Grantees may voluntarily reallocate partial or full projects. Funds from reallocation(s) are pooled to fund new projects

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# Reallocation

# Participation of People with Lived Experience of Homelessness (PWLEH)

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24 CFR 578.75(g)  
There must be at least one person with lived experience of homelessness (past or current) on the board of directors or equivalent policy making entity of HUD grant recipient

- To the maximum extent possible, involve people who have experienced homelessness in employment, volunteer opportunities, or other means in maintaining and operating housing and providing supportive services
- CoC projects are expected to engage PWLEH in program evaluation and quality improvement
- Should be provided reasonable compensation and reimbursement for travel



# Assessment and Service Planning

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Participant's supportive services needs must be assessed at least annually

- Services must be adjusted accordingly
- Assessment dated and documented in files
- Documentation that services were delivered (case notes/time sheets)
- Services consistent with Housing First
- Services provided with appropriate frequency

# Record Keeping Requirements

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## **Supportive Services provided**

- Types of services provided
- Case notes that show engagement; time records that support case notes
- Annual assessment of service needs

## **Housing Quality/Lead Based Paint**

- Leased units or units assisted with rental assistance must be inspected annually for HQS/Nspire
- Visual assessment for Lead Based Paint for applicable units

## **Rent Reasonableness**

- At least three comparable units
- Rental assistance cannot exceed the reasonable rent
- Leasing assistance cannot exceed either the reasonable rent or Fair Market Rent

# Program Participant Records

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## Eligibility

- Chronic Homeless/Homeless Status
- Disability for PSH

## Income/subsidy calculation

- Verified income of all household members
- Allowable deductions
- Subsidy computation including utility allowance

# Record Confidentiality & Retention

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## **Confidentiality**

All records with identifying information of individuals or families that apply for and/or receive CoC assistance must be kept secure and confidential

The address of any project serving survivors of domestic violence assisted with CoC Funds will not be made public

The address or location of any housing of a program participant will not be made public



## **Record Retention**

Participant records (qualifications, eligibility) must be retained for 5 years after expenditure of all grant funds

Records for acquisition, new construction and rehabilitation must be retained for 15 years after initial occupancy of project

## Questions/Discussion

