

All Entitlement Briefing OCCCD 2024 Spring Meeting

APRIL 26, 2024

Columbus CPD Staffing Update – 4/26/24

Matthew LaMantia is now the Region 5 CPD Regional Director but remains Acting Director of the Columbus CPD Field Office.

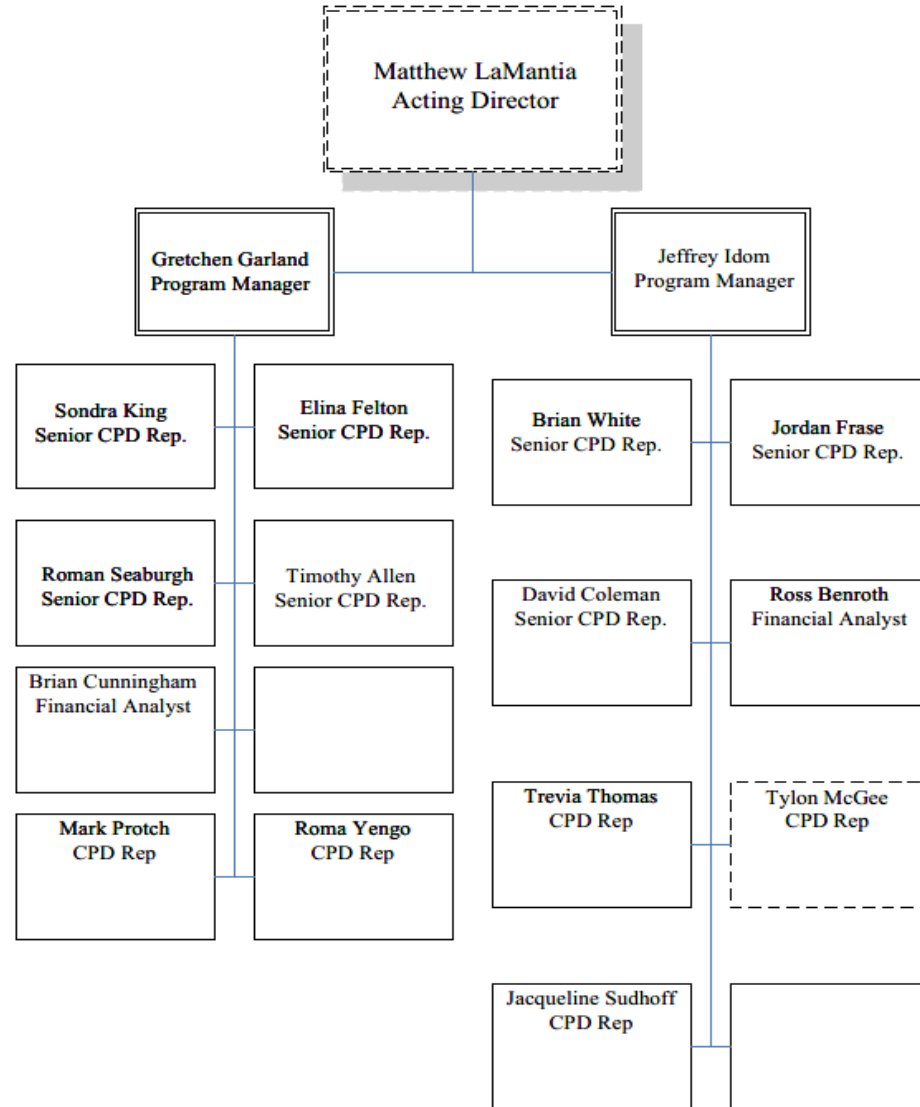
In addition to the Columbus Field Office, Matt will now be providing oversight to the following CPD Field Offices:

- Chicago
- Detroit
- Indianapolis
- Milwaukee
- Minneapolis

Until a new Columbus Field Office Director is named, please address all formal correspondence to:

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Acting Director, Community Planning and Development
U.S. Department of Housing and Urban Development
Columbus Field Office
200 N. High Street
Columbus, OH 43215
matthew.c.lamantia@hud.gov

Community Planning & Development Columbus Field Office



Updates and Reminders: FY24 Consolidated Plan/Annual Action Plan

Notice CPD-24-01: Guidance on Submitting Consolidated Plans and Annual Action Plans FY 2024 (Pre-Award Waiver)

The 45-day review period will begin whenever the eCon Planning Suite submission or original executed SF-424, certifications and applicable assurances (SF 424B and SF 424D, as applicable) are received by the field office, whichever is later

Under no circumstances may a Consolidated Plan/Action Plan be submitted to HUD later than **August 16, 2024**. Failure to submit an Action Plan for FY 2024 by August 16, 2024, will result in the automatic loss of FY 2024 CDBG funds to the grantee.

The notice includes program by program pre-award cost requirements and eligibilities:

- <https://www.hud.gov/sites/dfiles/OCHCO/documents/2024-01cpdn.pdf>

Issues with eCon Planning Suite attachments should be submitted to AAQ:

- <https://www.hudexchange.info/program-support/my-question/>
- In the AAQ submit the issue to both the eCon Planning Suite AND IDIS

Updates and Reminders: FY 24 Grant Allocations and Grant Agreements

- All CPD Formula Allocations will be announced by May 8, 2024
- Most 2024 Formula Grant agreements will include some BABA provisions:
 - CDBG, ESG, HOPWA, RHP are now BABA applicable
 - HOME and HTF will be BABA applicable if grant is obligated after August 23, 2024
 - Ensure that BABA applicable activities are indicated as such in IDIS for each activity
 - BABA trainings can be found at
 - [Build America, Buy America Act: Quick Guide for CPD Programs](#)
 - [Build America, Buy America Act Webinar for HUD CPD Grantees](#)
 - [Beyond the Basics: Implementing the BAP](#)
 - BABA Project-Specific Waiver Systems and Resources
 - [BABA Project-Specific Waiver System and Resources](#)
- All questions related to BABA implementation should be submitted to CPDBABA@hud.gov

FY 2024 Action and Consolidated Plans

Tip – Always a good idea to include your Citizen Participation Plan with the AAP

Tip – Ensure you run the Quality Check and address deficiencies prior to submission in IDIS

Ensure funds entered in AP 15, Expected Resources, are consistent with Program Activities funded in the AP 35/38.

AP 55 – Affordable Housing

- The Action Plan must specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year.
 - For each goal listed, estimate the number of homeless households that will be helped in the program year with housing assistance. This includes:
 - Rental assistance
 - Production of new units
 - Rehabilitation of existing units
 - Acquisition of existing units
 - **This estimate should not include the provision of emergency shelter, transitional shelter, or social services.**

HOME PJs Ensure your full Resale and or Recapture provisions are included/attached within your Con Plan and AAP submission, failure to do so may delay HOME funding.

[eCon Planning Suite Desk Guide](#)

Updates and Reminders: FY 2023 CAPER

- All expenditures and accomplishments for the reporting timeframe should be reflected in IDIS and any narrative on COVID impacts can be included in the CAPER comments.
- CV activities completed during the reporting period should be reflected in the CAPER.
- Amendments to the AAP should be described in the CAPER.
- CAPERS are due within 90 days of the end of the program year.
- If making adjustments to your PR-26, Financial Summary Report, attach narratives/spread sheets to support the adjustments as part of the CAPER submission
- Please ensure you are completing the ESG CAPER in SAGE and HOPWA Consolidated APR/CAPER
 - [ESG CAPER Submission Guidance](#)
 - [HOPWA Consolidated APR/CAPER](#)
- ***Late CAPER submissions can impact your annual risk score, and may result in Findings!***

Updates and Reminders: FY 2023 CAPER – Two Administrative Test

In annual appropriations acts, Congress limits the amount grantees may use for planning, management development, and administration to no more than 20 percent of each grant. The grant based accounting interim rule implements two distinct compliance tests under §570.200(g) for planning and administration funds: the existing obligation test and a new origin year expenditure test. The grantee must pass both tests to meet compliance. These two Test are the Program Year Obligation Test, and the Origin Year Grant Expenditure Test.

Program Year Obligation Test

Program year obligation test: (§570.200(g)(2)) This test has always occurred, and continues to be in Part V of the PR26 CDBG Financial Summary report. The amount of CDBG funds obligated during each program year for planning plus administrative costs, as defined in §570.205 and §570.206, respectively, must be limited to an amount no greater than 20 percent of the sum of the grant made for that program year plus the program income received by the recipient and its subrecipients (if any) during that program year.

Most grantees comply with this test

Origin Year Grant Expenditure Test

Effective For 2015 and Later CDBG Grants

Origin year grant expenditure test: (§570.200(g)(1)) This is a new test and required for 2015 CDBG origin year grants and subsequent origin year grants. No more than 20 percent of any origin year grant shall be expended for planning and program administrative costs, as defined in §570.205 and §570.206, respectively. Program income expenditures for planning and program administrative costs are excluded from this calculation. Funds from a grant of any origin year may be used to pay planning and program administrative costs associated with any grant of any origin year.

Compliance with the origin year expenditure test is not determined until a grantee has expended 100% of that given year's origin year grant funds. HUD has developed an IDIS report, "PR26 – Activity Summary by Selected Grant", to determine compliance for the origin year expenditure test. This test applies to 2015 CDBG origin year grants and subsequent grants.

HUD staff and grantees should use this report at the end of each program year (during the CAPER process) to determine if a grantee has expended no more than 20 percent of any origin year grant for planning plus program administration costs. A good practice would be to use this report periodically throughout the year, and particularly with each year's CAPER, to track how close a grantee is getting to the 20% cap for each origin year grant.

Noncompliance may result in repayment of CDBG funds to your Line of Credit or Local Account.

Webinar on Origin Year Grant Expenditure Test can be found at the link below:

- <https://www.youtube.com/watch?v=hq8Z2Ojmsl4>

Updates and Reminders: Expiring Funds

FY 17 CDBG Balances Expiring:

- CDBG grants are subject to 31 U.S.C. 1552(a), as amended by the National Defense Authorization Act (NDAA) of 1991.
- Undisbursed CDBG FY 2017 grant funds will be returned to the U.S. Department of Treasury if those funds are not disbursed by **September 27th, 2024.**

FY 16 HOME Balances Expiring:

- Any HOME funds appropriated in federal fiscal year (FY) 2016 will not be available for HOME Participating Jurisdictions (PJs) to expend after **September 30, 2024** (for more information please see **HOME FACTS - Vol. 11, No. 1, April 2023**). This date has been extended one year for the HOME program in the Consolidated and Further Continuing Appropriations Act, 2015 (P.L. 113-235)
- [HOME Expiring Funds Reports](#)

Updates and Reminders: Expiring Funds

ESG-CV

Any funding allocated for ESG-CV Rounds 1 and 2 can no longer be spent and HUD expects you are working to complete final draws for both allocations. As shown below, final draws for both must be completed by April 30, 2024:

| | Expenditure Deadline | Draw Deadline* | QPR Deadline |
|--|-----------------------------|-------------------------|-------------------------|
| ESG-CV Rounds 1 & 2 all project costs | September 30, 2023 | April 30, 2024 | July 31, 2024 |
| ESG-CV Rounds 1 & 2 HMIS and Admin funds needed for closeout | December 31, 2023 | April 30, 2024 | July 31, 2024 |
| Reallocated Funds | June 30, 2024 | October 31, 2024 | January 31, 2025 |

Updates and Reminders: CPD Program Closeouts

CPD Financial Analyst and CPD Representative are here to help to initiate and process CPD Grant Closeouts, Please ensure final metrics reporting such as CAPERs and APRs are completed timely and accurately.

Closeout Resources for CPD Programs are below:

- CDBG, CDBG-CV, CDBG-DR, RHP, NSP
 - [Notice CPD-22-14: Closeout Instructions for CDBG Programs.](#)
- HOME, HOME-ARP, HTF
 - [Closeout for HOME, HTF, and HOME-ARP Grants](#)
- ESG CV
 - [Homeless System Response:\(ESG-CV\) Close Out Process](#)
 - [ESG-CV Closeout Process in Sage Webinar](#)
- HOPWA and HOPWA-CV
 - [CPD-23-04: Closeout Instructions for Housing Opportunities for Persons With AIDS \(HOPWA\) Program Grants](#)

Updates and Reminders: CDBG Timeliness

As of October 21, 2021, the COVID CDBG Timeliness Waiver was lifted.

As of October 1, 2023:

- A grantee complies if, 60 days prior to the end of its program year, the balance in the grantee's line of credit, plus the balance of program income (which includes Revolving Loan Funds) on hand, is not more than 1.5 times the most recent entitlement grant.
- 1st Time Untimely – Workout Plan
- 2nd Time Untimely – “Informal Consultation” & Potential Loss of Funding

Please make sure to regularly run, at least monthly, the PR-56 report in IDIS/MicroStrategy.

The adjusted ratio, which includes receipted Program Income and Revolving Loan Funds, determines timeliness.

Your Program Design should be evaluated if you are struggling to meet this requirement.

***NOTE* HUD will not prepare a 2024 CDBG Grant Agreement for 2nd tim untimely grantees until a final determination is made pending the results of the Informal Consultation with OBGA.**

CDBG Timeliness, cont.

Resources:

- [CDBG Timeliness and Best Practices to Achieve Timely Performance](#)
- [Developing and Implementing a CDBG Workout Plan](#)
- [Keeping Your CDBG Funds Moving](#)
- [Ensuring CDBG Subrecipient Timeliness](#)
- [Managing CDBG: Guidebook for CDBG Grantees on Subrecipient Oversight](#)
- [Playing by the Rules: A Handbook for CDBG Subrecipients on Administrative Systems](#)

Updates and Reminders: 2024 HOME Max Per Unit Subsidy Limit

The HOME Max Per Unit Subsidy Limits has been based on the Section 234 – Condominium (elevator type) limits.

The 2024 Limits are not available as of 4/26/24, should be coming imminently.

PJs should not calculate their own HOME per-unit subsidy limits by using the High Cost Percentages and the Section 234 basic mortgage limits that are published in the Federal Register by HUD's Office of Multifamily Housing.

The Columbus FO will send all Ohio HOME PJ the Max Per Unit Subsidy Limits applicable within Ohio when the final calculations have been determined for FY 2024 by OAHP.

HUD Exchange Max Per-Subsidy Subsidy Limit Page

- [HOME Maximum Per-Unit Subsidy Limits](#)

Until the 2024 limits are provided by this office, please continue to use the established 2023 limits below.

2023 HOME Max Per Unit Subsidy Limit

2023 Limits for HOME Maximum Per-Unit Subsidies – Ohio PJs:

| Bedrooms | Limit | HCP Limit (240%) |
|-----------------|---------------|-------------------------|
| 0 | \$ 72,088.00 | \$ 173,011.20 |
| 1 | \$ 82,638.00 | \$ 198,331.20 |
| 2 | \$ 100,490.00 | \$ 241,176.00 |
| 3 | \$ 130,002.00 | \$ 312,004.80 |
| 4+ | \$ 142,701.00 | \$ 342,482.40 |

Updates and Reminders: CDBG-CV

Milestone Dates:

- Expenditure Deadlines:
 - As of April 18, 2023, HUD has officially removed the 3-year, 80 percent expenditure requirement for CDBG-CV funds. <https://www.federalregister.gov/documents/2023/04/18/2023-08158/notice-of-change-to-an-expenditure-deadline-under-the-cares-act-for-community-development-block>
 - 100 percent must be expended within 6 years of the execution date of the initial CDBG-CV grant agreement.

Updates and Reminders

HOME-ARP

HOME-ARP Specialists have been assigned to Region 5.

- More information to come

Email the HOME-ARP Team for HOME-ARP policy or program implementation questions

HOMEARP@hud.gov ***Please CC your CPD Representative on any correspondence!***

HOME-ARP FAQs

https://www.hud.gov/program_offices/comm_planning/home-arp/faqs

Program Information:

<https://www.hudexchange.info/programs/home-arp/>

https://www.hud.gov/program_offices/comm_planning/home-arp

CoC Environmental Reviews

HUD will complete environmental reviews for all FY23 CoC Awards limited to Soft Costs (operating/admin, supportive services, and HMIS) and Tenant Based Rental Assistance/Leasing under Part 50.

CoC Grantees with Sponsor Based or Project Based Rental Assistance grants (where the participant has DOES NOT have autonomy in selecting their own unit) will be advised to work with the Responsible Entity (RE) of the entitlement community they're located in, or the nearest UGLG, to conduct limited scope reviews under Part 58.

These reviews do not have to be conducted onsite, only require a review of a small number of factors and can be completed very quickly.

If you are asked, please work with your local CoC service providers to complete & sign off on these reviews to help avoid any disruption of service for these vulnerable populations.

Environmental Reviews:

Applicable to ALL HUD CPD Programs:

The HUD RROF Objections sections of public notices should now include CPDColumbusRROF@hud.gov as the contact.

The RROF should be submitted to CPDColumbusRROF@hud.gov , cc'ing your CPD Representative.

Additional Updates and Reminders

NSP/ESG-CV/HOPWA-CV Quarterly Reports are due April 30, 2024

Please update contact information in IDIS:

- Grantee users with local administration authority can edit the contact information.
- Have a primary and secondary contact for each program you administer.
- Remove users who are no longer with the program or jurisdictions

Columbus CPD Listservs:

- [Add me to the Columbus Formula Grantee Listserv](#)
- [Add me to the Columbus CoC Listserv](#)

National Standards for the Physical Inspection of Real Estate (NSPIRE) – Effective 9/30/2023

- https://www.hud.gov/program_offices/public_indian_housing/react/nspire

Section 3 on HUD Exchange: <https://www.hudexchange.info/programs/section-3/>

- Resources and FAQs continue to be updated

Reminders from the Financial Analysts

Ross Benroth & Brian Cunningham



Repayment Instructions



Grant Closeouts



Cash on Hand Report



HOME Program Income



IDIS New User Forms

IDIS Online Access Request form

IDIS OnLine Access Request

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

OMB Approval No. 2506-0171 exp 07/31/2025

Privacy Act Statement: Public Law 97-255, Financial Integrity Act, 31 U.S.C. 3512, authorizes the Department of Housing and Urban Development (HUD) to collect all the information which will be used by HUD to protect disbursement data from fraudulent actions. The purpose of the data is to safeguard the Integrated Disbursement and Information System (IDIS) from unauthorized access. The data are used to ensure that individuals who no longer require access to IDIS have their access capability promptly deleted. This information will not be otherwise disclosed or released outside of HUD, except as permitted or required by law. Failure to provide the information requested on the form may delay the processing of your approval for access to IDIS.

Public Reporting burden for this information collection is estimated to average 30 minutes including time for collecting, reviewing, and reporting data. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

GRANTEE & REQUESTOR INFORMATION

| REQUEST TYPE | Role to be Performed by Headquarters | Role to be Performed by Field or Local IDIS Administrator |
|--------------------------------|--------------------------------------|---|
| New Request | <input type="checkbox"/> | Drop from IDIS <input type="checkbox"/> |
| Renew Lapsed ID | <input type="checkbox"/> | Change Function or Program Area <input type="checkbox"/> |
| Change Name | <input type="checkbox"/> | |
| Add Access for Another Grantee | <input type="checkbox"/> | |

Please create a five digit pin that will be used for password reset:

Requestor's Name (Last, First, MI): Office E-mail Address:

Office Address: Office Phone: ext.:

Grantee Name in IDIS: **GRANTEE TYPE**
City County State Non-Profit Sub Grantee*

Please Mark All Necessary Functions & Programs

Authorized Functions: Set Up Activity Request Drawdown
 Approve Drawdown Local IDIS Administrator

Program Areas: CDBG HOME ESG HOPWA
HESG HOPWA-C HTF Other:

*Approval of State Sub Grantee Request – CPD State Coordinator or State Official name, signature and date:
Name: Signature: Date:

Modules

| | | | |
|-----------|---|-------------------------------|-------------------------------|
| Con Plan: | Create/Edit/Submit <input type="checkbox"/> | Edit <input type="checkbox"/> | View <input type="checkbox"/> |
| Caper: | Create/Edit/Submit <input type="checkbox"/> | Edit <input type="checkbox"/> | View <input type="checkbox"/> |

IDIS Online Rules of Behavior
September 14, 2015

Introduction

This Rules of Behavior (RoB) procedure was developed as a guide to ensure that all users of IDIS Online are made aware of their security responsibilities before accessing IDIS Online. The RoB defines responsibilities and procedures for secure use of IDIS Online. By reading and acknowledging these rules, users accept the responsibility to protect IDIS Online and data. Users are accountable for their actions and the requirements to protect IDIS Online data and equipment from both malicious and accidental loss and damage. These rules clearly delineate the responsibilities of and expectations for all individuals with access to IDIS Online. Non-compliance with these rules will be enforced through sanctions commensurate with the level of infraction.

Responsibilities

All authorized users who have access to IDIS Online are required to read, acknowledge understanding, and sign the RoB before accessing IDIS Online and associated data. This acknowledgement must be completed annually thereafter.

By agreeing to and signing these rules, the user signifies:

1. Understanding that access is given only to IDIS Online to which the user requires access in the performance of their official duties and the user will not attempt to access systems they are not authorized to access.

ALL PREVIOUS VERSIONS OF THIS FORM WILL NOT BE ACCEPTED OR PROCESSED.

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9. You must follow proper logon/logoff procedures. You must manually logon to your session; do not store your password locally on your system or utilize any automated logon capabilities. You must promptly logoff when session access is no longer needed. If a logoff function is unavailable, you must close your browser. Never leave your computer unattended while logged into IDIS Online.
10. You must not establish any unauthorized interfaces between IDIS Online and other non-HUD systems.
11. Your access to IDIS Online constitutes your consent to the retrieval and disclosure of the information within the scope of your authorized access, subject to the Privacy Act, and applicable Federal laws.
12. You must safeguard IDIS Online resources against waste, loss, abuse, unauthorized use of disclosure, and misappropriation.
13. You must not process classified national security information on IDIS Online.
14. You must not browse, search or reveal IDIS Online data except in accordance with that which is required to perform your legitimate tasks or assigned duties. You must not retrieve data, or in any other way disclose data, for someone who does not have authority to access that information.
15. By your signature or electronic acceptance (such as by clicking an acceptance button on the screen), you must agree to these rules

User Acknowledgement and Certification— I acknowledge and certify that:

1. I understand the IDIS RoB and Federal Government policies as set forth above regarding security awareness and practices when accessing and utilizing IDIS Online.
2. I have read and understand the IDIS RoB governing my use of IDIS Online and agree to abide by them.
3. I understand my responsibilities and the penalties for NOT ADHERING to the IDIS RoB.
4. I understand that failure to comply will result in disciplinary action against me which may include, but are not limited to, a verbal or written warning, removal of system access, reassignment to other duties, demotion, suspension, reassignment, termination, and possible criminal and/or civil prosecution.

Requestor Name: Signature: Date:

GRANTEE APPROVING OFFICIAL

Approving Official's Name:

Title:

Office Phone: ext.:

Office Address: (Street, City, State, Zip)

Signature: Date:

I authorize the person above to have access to IDIS functions checked.

NOTARY

The Approving Official's signature must be notarized to verify the identity of the individual who signed this document using the appropriate notary certificate of the state, territory or insular area. Once completed, attach the completed notary certificate to this form and send to your local HUD CPD Field Office. If your state, territory or insular area does not require a notary certificate, use the space below.

Date:

Signature:

HUD FIELD OFFICES

Field Office Approval (CPD Director or Designee)
Name: Signature: Date:

ALL PREVIOUS VERSIONS OF THIS FORM WILL NOT BE ACCEPTED OR PROCESSED.

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Contact Information



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