

# All Entitlement Briefing OCCCD 2024 Summer Meeting

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JULY 26, 2024

# Updates and Reminders: FY24 Consolidated Plan/Annual Action Plan

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## **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 funds to the grantee.

**If there are any circumstances in which you are unable to submit your Con Plan/Annual Action Plan by August 16, 2024, Contact the Columbus Field Office IMMEDIATELY!!!!!!**

At a minimum, the Con Plan/AAP submitted on or before August 16, 2024, must contain the following:

- Final Statement in the Executive Summary (ES 05/AP 05) which describes each grant funding source (CDBG, HOME, ESG, HOPWA, etc.)
- SF-424 (signed)
- Grant Certifications (signed)

# Updates and Reminders: FY24 Consolidated Plan/Annual Action Plan

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This 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: FY24 Grant Agreements

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- Grant Agreements will begin to be issued the week of August 5<sup>th</sup> for grantees with Con Plan/Action Plan Approved.
  - Upon execution, funds will be added to your Line of Credit – Beware of the impact on your timeliness test!
    - **REMINDER:** If you are second time untimely or more, HUD will issue a grant agreement only after an informal consultation has been held by OBGAs, and OBGAs has made a determination of continued funding for FY 2024.
    - **NOTE:** For impacted second time untimely grantees, delay of the CDBG grant will not delay other CPD Funding Grant Agreements (HOME, ESG, HOPWA)
    - **NOTE:** Grantees who are second time untimely as of August 2<sup>nd</sup>, 2024, are also subject to delay or loss of CDBG funding for FY 2024

# Updates and Reminders: FY24 Grant Agreements – (BABA)

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- 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 activities
  - 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](mailto:CPDBABA@hud.gov)

# Updates and Reminders: 2024 Transmittal Letters

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## Includes reminders to grantee regarding:

- Affirmatively Furthering Fair Housing
- Preventing Waste, Fraud and Abuse and Whistleblower Protections
- FFATA Reporting
- Revised Federal Uniform Guidance (2 CFR Part 200)
  - These revisions become effective for awards issued on or after October 1, 2024, except for the revisions to Subpart F (Audit Requirements), which are effective for fiscal years beginning on or after October 1, 2024.
- Environmental Review (updated from FY23)
- BABA

# Updates and Reminders: FY 2023 CAPER

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- 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: Reporting Requirements

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- **Quarterly Cash on Hand Reports**

Due in IDIS 30 days after the end of each calendar year quarter

- **Single Audit**

Annual, timely submission to the Federal Audit Clearinghouse is required. Generally, within 9 months after the end of your fiscal is considered timely (2 CFR 200.512).

Do not submit single audits to the Field Office.

- **NSP – Quarterly Reports**

NSP Quarterly Reports are due July 31, 2024

***Late or missing reporting will significantly impact your annual risk score!***



# Updates and Reminders: CDBG

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Urban County Requalification – 2 of 11 Urban Counties are Impacted this year:

- [Notice CPD-23-02: Instructions for Urban County Qualification for Participation in the CDBG Program for FYs 2024-2026](#)
- **Final documentation is due to the Field Office on August 16, 2024. However, the Columbus Field Office Request this information by August 12, 2024.**
- Look out for communication from Andy Coleman

FY17 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 30th, 2024.**
- 11 Ohio CDBG Grantees currently have a 2017 CDBG balance as of 7/25/24.

Closeout Instructions for CDBG Programs:

- [Notice CPD-22-14: Closeout Instructions for CDBG Programs.](#)
- Applicable to CDBG, Section 108, CDBG-DR, CDBG-CV), NSP, and RHP.
- OBGA will begin bulk closeouts of older grants this year.

# Updates and Reminders: Expiring Funds

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## 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

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## ESG-CV

Any funding allocated for ESG-CV Rounds 1 and 2 can no longer be drawn. HUD expects you to be working on your final reports which are due by July 31, 2024.

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

# Updates and Reminders: CPD Program Closeouts

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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: HOME

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2024 Limits for HOME Maximum Per-Unit Subsidies – Ohio PJs:

<b>Bedrooms</b>	<b>Limit</b>	<b>HCP Limit (240%)</b>
0	\$ 75,620.00	\$ 181,488.20
1	\$ 86,687.00	\$ 208,048.20
2	\$ 105,414.00	\$ 252,993.60
3	\$136,372.00	\$ 327,292.80
4+	\$ 149,693.00	\$ 359,263.20

Field Office Memo issued on May 20, 2024, to Ohio PJs. Retain in your HOME Program Files

<https://www.hudexchange.info/news/hud-publishes-limits-for-home-maximum-per-unit-subsidies/>

# Updates and Reminders: CDBG-CV

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## 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.
  - Training - 2024/2025 CDBG-CV In-Person Problem Solving Clinics
    - One on One TA is included
    - [View Locations and Register here](#)

# Updates and Reminders: HOME-ARP

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

[HOMEARP@hud.gov](mailto: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](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](https://www.hud.gov/program_offices/comm_planning/home-arp)

# Updates and Reminders: HOPWA Institute

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- **2024 HOPWA Institute**
  - October 21-23 in Washington, DC
  - Registration is now open! All grantees and eligible project sponsor agencies (receiving over \$250,000/year) received an email from [hopwa2024@aeioonline.com](mailto:hopwa2024@aeioonline.com) with the registration website link.
  - Registration for in-person participation closes 8/21; virtual participation is also available.



# Updates and Reminders: CoCBuillds NOFO

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- Published Friday (July 19): [Continuum of Care \(CoC\) Builds](#)
- NOFO is specifically for **capital costs** (new construction, acquisition, rehabilitation) for new permanent supportive housing units.
  - eligible activities fall under the CoC Program regulations; there are no special activities, just dedicated funds for capital costs.
- \$175 million of total funds available
- NOFO Deadline: November 21, 2024
- Questions? Use dedicated email address for this NOFO: [CoCBuillds@hud.gov](mailto:CoCBuillds@hud.gov)

# CoC Environmental Reviews

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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) have been 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:

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The HUD RROF Objections sections of public notices should only include [CPDColumbusRROF@hud.gov](mailto:CPDColumbusRROF@hud.gov) as the contact.

- Do not include the HUD physical mailing address.

The RROF should be submitted to [CPDColumbusRROF@hud.gov](mailto:CPDColumbusRROF@hud.gov) , cc'ing your CPD Representative.

# Environmental Reviews: HOME PJ Specific

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## Projects receiving HUD assistance from more than one Responsible Entity

- For CEST and EA projects, **each** responsible entity that provides HUD assistance to a project **must** submit its own Request for Release of Funds (7015.15).
- Questions should be directed to [CPDColumbusRROF@hud.gov](mailto:CPDColumbusRROF@hud.gov)

## ER procedures for Project-Based Vouchers (PBVs)

- Submit Requests for Release of Funds for PBVs to the HUD Cleveland Public Housing Office at [Clevelandpublichousing@hud.gov](mailto:Clevelandpublichousing@hud.gov)
- A Notice of Intent to Request Release of Funds for PBVs includes program-specific language
- PBV ER questions can be directed to Andrea Vrankar at [Andrea.Vrankar@hud.gov](mailto:Andrea.Vrankar@hud.gov)

# Additional Updates and Reminders

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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.

National Standards for the Physical Inspection of Real Estate (NSPIRE) –Now Applicable 10/1/2025 (HOME,HTF, ESG,CoC)

- [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/reac/nspire](https://www.hud.gov/program_offices/public_indian_housing/reac/nspire)

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

- Resources and FAQs continue to be updated

Radon mitigation will be a focus area for HUD in the coming months.

# Field Office Request:

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- **Request from:** Headquarters' OBGA
- **What:** Project Profiles/Case Studies of grantees that have funded CDBG, HOME, SNAPS and COC activities that address Extreme Heat
  - Sample activities include:
    - Heat-Resilient Building Codes and Practices
    - Weatherization of Homes;
    - Energy Efficiency Audits and Retrofits
    - Cooling Centers
    - Cool Surfaces: Green Roofs, Walls, and Pavement
    - Green Infrastructure
    - Tree Planting
    - Public Cooling Centers
    - Energy Bill Assistance Programs / Emergency Grant Payments
    - Air Conditioner Distribution Programs
    - Public Health Outreach Programs – public awareness campaigns
- **Why:** These case studies will be featured in a comprehensive HUD Extreme Heat Playbook to be published in October 2024
- **How:** Email your CPD Rep
- **When:** By Friday, August 2, 2024

# Field Office Request:

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- **Request from:** Columbus Field Office
- **What:** Need Technical Assistance? Would you like a HUD wellness visit on a specific topic or program?
- **How:** Email your CPD Rep
- **When:** **By August 30<sup>th</sup>, 2024**

# Contact Information

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