U.S. Department of Housing and Urban Development
Office of Housing Counseling

Submitting a Budget
January 12, 2016
2:00 PM

Facilitated by

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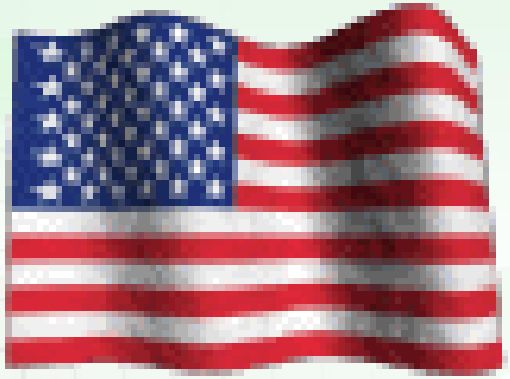
Training Topics

- Overview of Budgeting Process
- Preparing a Budget
  - Determine programmatic financial requirements
  - Develop Budget and Assumptions
  - Verify Allowability, Allocability and Reasonableness
  - Internal Review and Submission
  - Negotiations and Approval
- Things to Remember
- Frequently Asked Questions



OVERVIEW OF BUDGETING PROCESS

OVERVIEW OF BUDGETING PROCESS

Regulations

§200.8 Budget.

Budget means the financial plan for the project or program that the Federal awarding agency or pass-through entity approves during the Federal award process or in subsequent amendments to the Federal award. It may include the Federal and non-Federal share or only the Federal share, as determined by the Federal awarding agency or pass-through entity.

§200.308 Revision of budget and program plans.

- (a) The approved budget for the Federal award summarizes the financial aspects of the project or program as approved during the Federal award process. It may include either the Federal and non-Federal share (see §200.43 Federal share) or only the Federal share, depending upon Federal awarding agency requirements. It must be related to performance for program evaluation purposes whenever appropriate.
- (b) Recipients are required to report deviations from budget or project scope or objective, and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section.

OVERVIEW OF BUDGETING PROCESS

Submission

- Grantee submits budget
- Sign and date

Review and Negotiations

- Reviewed by HUD
- Questions, clarifications and negotiations

Approval

- Approved by HUD POC
- HUD POC notifies grantee of approval

PREPARING A BUDGET

PREPARING A BUDGET

Step 1:
Determine programmatic requirements consistent with approved work plan

Step 2:
Develop budget and assumptions

Step : Verify allowability, allocability and reasonableness

Step 4:
Review budget internally with accounting/finance

Step 5:
Submit Budget to HUD and Negotiate with POC

BUDGET FOR APPROVAL

Step 1: Compare to programmatic requirements

- Based on the approved award amount
- Review approved work plan
- If prior grant, review prior grant activity

BUDGET FOR APPROVAL

Step 1: Compare to programmatic requirements

Additional budget related requirements for Intermediaries, MSOs, and SHFAs must include:

- Updated list of sub-grantees and funded branches and their corresponding sub-allocations
  - If reimbursing sub-grantees and/or branches at a fixed rate per counseling/education activity also have to submit budgets
- A detailed budget accounting for how all administrative funds (funds not passed through)
  - Includes funds for training, travel, salaries and equipment for each quarter and cumulative
  - If reimbursement period is for first two quarters, 3rd quarter budget shall reflect itemized accounting for each period
- Billing methodology

BUDGET FOR APPROVAL

Step 1: Compare to programmatic requirements

Additional budget related requirements for Intermediaries, MSOs, and SHFAs must include (continued):

- Billing methodology
  - Explain clearly the methodology used to reimburse Sub-grantees or branches
  - If using formula, indicate hourly rate attributed to Grant or how each cost is calculated for fixed-cost reimbursement
  - Explain process to ensure method/ costs used do not exceed actual costs

BUDGET FOR APPROVAL

Step 2: Develop budget and assumptions

- HUD Form SF-424 CB or Other Format
- Detailed itemized budgetary line items, at a minimum salaries, fringe and other benefits, training, travel, rent, phone, postage, supplies, technology/ equipment, marketing and indirect costs
- Assumptions to support budgetary line items:
  - Salaries based on actual amounts to be paid
  - Administrative salaries must be justified
  - Fringes based on annual amounts
  - Indirect cost – Negotiated Indirect Cost Rate Agreement OR indirect cost rate tool to be provided by HUD

PREPARING A BUDGET

Step 2: Develop budget and assumptions

Definitions

- Assumption is, "a thing that is accepted as true or as certain to happen, without proof."
- Budget Assumptions are expectations -- usually expected or presumed expenses.

Importance

- Documented and communicated
- Promotes consistency and fairness
- Critical to ensure the results can be supported and explained

PREPARING A BUDGET

Step 2: Develop budget and assumptions

Grant Application Detailed Budget	U.S. Department of Housing and Urban Development					OMB Approval No. 2501-0017 (exp. 11/30/2014)			
	Functional Categories					[Year 1:__] [Year 2:__] [Year 3:__] [All Years:__]			
Name of Project/Activity:	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
	HUD Share	Applicant Match	Other HUD Fundr	Other Fed Share	State Share	Local/Tribal Share	Other	Program Income	Total
a. Personnel (Direct Labor)	$	$	$	$	$	$	$	$	$
b. Fringe Benefits									
c. Travel									
d. Equipment (only items > $5,000 depreciated value)									
e. Supplies (only items w/depreciated Value < $5,000)									
f. Contractual									
g. Construction									
1. Administration and legal expenses									
2. Land, structures, rights-of way, appraisals, etc.									
3. Relocation expenses and payments									
4. Architectural and engineering fees									
5. Other architectural and engineering fees									
6. Project inspection fees									
7. Site work									
8. Demolition and removal									
9. Construction									
10. Equipment									
11. Contingencies									
12. Miscellaneous									
h. Other (Direct Costs)									
i. Subtotal of Direct Costs									
j. Indirect Costs (% Approved Indirect Cost Rate:___%)									
Grand Total (Year:____):									
Grand Total (All Years):									

HUD Form SF-424 should be signed and dated

PREPARING A BUDGET

Step 2: Develop budget and assumptions

General Instructions

This form is designed so that an application can be made for any of HUD's grant programs. Separate sheets must be used for each proposed program year and for a summary of all years.

Check applicable program year or all years box at top of page to indicate which applies.

On the final sheet enter the Grand Total for all years in the applicable box at the bottom of the page. In preparing the budget, adhere to any existing HUD requirements which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, HUD may require budgets to be shown separately by function or activity. Your budget information should show the entire cost of your proposed program of activities per year. If you are not using funds in any of the line item categories, you should leave the item blank. Pages may be duplicated to show budget data for individual programs, projects or activities.

NOTE: Not all budget categories on this form are eligible for funding under all programs. Please see eligible activities under the specific program for which you are seeking funding.

Budget Categories

The budget categories identifies how your program funds will be allocated by type of use, e.g., funds going for salaries, travel, contracts, etc. Each of these line items shou be broken out under each applicable column.

Lines a-f--Show the totals of Lines a to f in each column.

Lines g. Show construction related expenses in the appropriate categories below.

Line g.1.--Enter estimated amounts needed to cover administrative expenses. Do not include costs which are related to the normal functions of government.

Line g.2.--Enter estimated site and right(s)-of-way acquisition costs (this includes purchase, lease, and/or easements).

Line g.3.--Enter estimated costs related to relocation advisory assistance, replacement housing, relocation payments to displaced persons and businesses, etc.

Line g.4.--Enter estimated basic engineering fees related to construction (this includes start-up services and preparation of project performance work plan).

Line g.5.--Enter estimated engineering costs, such as surveys, tests, soil borings, etc.

Line g.6.--Enter estimated engineering inspection costs.

Line g.7.--Enter the estimated site preparation and restoration which are not included in the basic construction contract.

Line g.8.--Enter the estimated costs related to demolition activities.

Line g.9.--Enter estimated costs of the construction contract.

Line g.10.--Enter estimated cost of office, shop, laboratory, safety equipment, etc. to be used at the facility, if such costs are not included in the construction contract.

Line g.11.--Enter any estimated contingency costs.

Line g.12.--Enter estimated miscellaneous costs.

Line h.--Enter any other direct costs not already addressed above.

Line i.--Calculate the totals of all applicable columns to determine the Subtotal of Direct Costs.

Line j.--Indicate the approved Indirect Cost Rate (if any) and calculate the indirect cost in accordance with the terms of your approved indirect cost rate and enter the resulting amount.

Grand Total (Year:__)--Enter the sum of lines i. and j. under column 9 for each year, and enter the applicable year, in the blank, for each sheet completed.

Grand Total (All Years)--Enter the sum of all the, "Grand Total (Year:__)" amounts from each sheet completed, under column 9, for all proposed years.

For each budget category (personnel, fringe benefits, travel, etc) you should identify the amount of funding you plan on using in your grant program. You should complete each column as follows:

Column 1 - Identify the amount of funds that you will need from the HUD grant program for which you are seeking funding.

Column 2 - Identify any matching funds that you are required to include in your proposed program in order to be eligible for assistance.

Column 3 - Identify any other HUD funds that you will be adding to this program either through your formula or competitive grant programs.

Column 4 - Identify any other Federal funds that you will be adding to this program either through your formula or competitive grant programs.

Column 5 - Identify any State funds that you will be adding to this program.

Column 6 - Identify any Local or Tribal Government funds that you will be adding to this program.

Column 7 - Identify any additional funds not previously identified in Columns 1 - 6, that you intend to use for your proposed program.

Column 8 - Identify any program income that you expect to generate under this program.

Column 9 Add columns 1 - 8 across and place the total in Column 9.

Instructions for HUD Form SF-424

PREPARING A BUDGET

Step 2: Develop budget and assumptions

U.S. Department of Housing and Urban Development

Grant Application Detailed Budget

Name of Project/Activity:		Functional Categories					[Period of Performance:_____]			
		Column 1	**Column 2**	**Column 3**	**Column 4**	**Column 5**	**Column 6**	**Column 7**	**Column 8**	**Column 9**
		HUD Share	Applicant Match	Other HUD Funds	Other Fed Share	State Share	Local/Tribal Share	Other	Program Income	Total
a. Personnel (Direct Labor)		$	$	$	$	$	$	$	$ 1.00	$ 1.00
b. Fringe & Other Benefits									$ 1.00	$ 1.00
c. Training									$ 1.00	$ 1.00
d. Travel									$ 1.00	$ 1.00
e. Rent									$ 1.00	$ 1.00
f. Phone									$ 1.00	$ 1.00
g. Postage									$ 1.00	$ 1.00
h. Supplies									$ 1.00	$ 1.00
i. Technology/Equipment									$ 1.00	$ 1.00
j. Marketing/Advertising									$ 1.00	$ 1.00
k. Other (Direct Costs)									$ 1.00	$ 1.00
l. Subtotal of Direct Costs		$ -	$ -	$ -	$ -	$ -	$ -	$ -	**$ 11.00**	$ 11.00
m. Indirect Costs (Approved Indirect Cost Rate %age)	5%									$ 0.55
Grand Total (Year:___):										$ 11.55
Grand Total (All Years):										

Signature of Authorized Individual Date

Alternate Format

Printed Name and Title

By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject me to criminal civil or administrative penalties for fraud, false statements, false claims, or otherwise."

PREPARING A BUDGET

Step 2: Develop budget and assumptions

General Instructions for the HUD Grant Application Detailed Budget Form
This form is designed so that an application can be made for any of HUD's grant programs. Separate sheets must be used for each proposed program year and for a summary of all years. Check applicable program year or all years box at top of page to indicate which applies. On the final sheet enter the Grand Total for all years in the applicable box at the bottom of the page. In preparing the budget, adhere to any existing HUD requirements which prescribe how and whether budgeted amounts should be separately shown for different functions or activities within the program. For some programs, HUD may require budgets to be shown separately by function or activity. Your budget information should show the entire cost of your proposed program of activities per year. If you are not using funds in any of the line item categories, you should leave the item blank. Pages may be duplicated to show budget data for individual programs, projects or activities.

Budgetary Line Items		Functional Categories	
The budget categories identifies how your program funds will be allocated by type of use, e.g., funds going for salaries, travel, contracts, etc. Each of these line items should be broken out under each applicable column.		**Column 1**	Identify the amount of funds that you will need from the HUD grant program for which you are seeking funding.
Lines a thru j	Show the totals of Lines a to f in each column.	**Column 2**	Identify any matching funds that you are required to include in your proposed program in order to be eligible for assistance.
Line k	Enter any other direct costs not already addressed above.	**Column 3**	Identify any other HUD funds that you will be adding to this program either through your formula or competitive grant programs.
Line l:	Calculate the totals of all applicable columns to determine the Subtotal of Direct Costs.	**Column 4**	Identify any other Federal funds that you will be adding to this program either through your formula or competitive grant programs.
Line m:	Indicate the approved Indirect Cost Rate (if any) and calculate the indirect cost in accordance with the terms of your approved indirect cost rate and enter the resulting amount.	**Column 5**	Identify any State funds that you will be adding to this program.
Grand Total (Year:__	Enter the sum of lines l. and m. under column 9 for each year, and enter the applicable year, in the blank, for each sheet completed.	**Column 6**	Identify any Local or Tribal Government funds that you will be adding to this program
Grand Total (All Year	Enter the sum of all the, "Grand Total (Year:__)" amounts from each sheet completed, under column 9, for all proposed years.	**Column 7**	Identify any additional funds not previously identified in Columns 1- 6, that you intend to use for your proposed program.
Alternate Format		**Column 8**	Identify any program income that you expect to generate under this program.
		Column 9	Add columns 1- 8 across and place the total in Column 9.

PREPARING A BUDGET

Step 2: Develop budget and assumptions

EXAMPLE: Budget Assumptions for the HUD Grant Application Detailed Budget

Budgetary Line Item	Cost Principle Considerations	Assumption Examples
Personnel	Rates are reasonable, meet grant requirements for experience, within executive compensation requirements, §200.430 Compensation: Personal Services	Name, pay rate, labor category, # of hours and housing counseling years of experience.
Fringe Benefits	Reasonable rate, allowable fringe pool, §200.431 Compensation—Fringe Benefits.	Fringe pool (accounts), rate and effective date.
Travel	Reasonable (consistent with Federal Travel Regulations "FTR"), allowable purpose, allocable for HUD/OHC related activities, §200.474 Travel Costs	Purpose of travel, # of participants and itemized costs. ALL travel must be approved by HUD in advance of travel.
Supplies	Allowable, allocable for HUD/OHC related activities, reasonable costs/quantity	Itemized list (including quantity, unit, rate), use/purpose and costs.
Training	Allowable under §200.474 Training and Education and §200.432 Conferences	Purpose of training, rates, # of hours/fixed fee and services provided.
Equipment	Allowable consistent with §200.439 Equipment and other capital expenditures.	Itemized list (including quantity, unit, rate), use/purpose and costs.
Meals	Allowable, allocable for HUD/OHC related activities, reasonable (consistent with per diem requirements under FTR)	Purpose, # of participants and itemized costs.
Occupancy	Allowable under §200.465 Rental costs of real property and equipment, for HUD/OHC related activities, reasonable (FMV)	Rationale/justification, allocation methodology (based on square footage for # of individuals working on HUD grant) and FMV of rental costs.
Stipends	Allowable under Omni Circular Subpart E, allocable for HUD/OHC related activities, reasonable and necessary	Purpose, rates, # of participants and services provided.
All other proposed Costs (Postage, printing, delivery, etc.)	Allowable under Omni Circular Subpart E, allocable for HUD/OHC related activities, reasonable and necessary	Rationale/justification, costs, allocation methodology and purpose.

Alternate Format

PREPARING A BUDGET

Step 2: Develop budget and assumptions

U.S. Department of Housing and Urban Development
Itemized Accounting of Actual Costs - Budget vs. Actuals

Agency:		**Grant #**	
Period Starting Date	**Period End Date**	**Grant FY**	

Name of Project/Activity:	For the Quarter Ended			Cumulative to Date		
	Budget	Actual	Variance	Budget	Actual	Variance
	Total	Total	Total	Total	Total	Total
a. Personnel (Direct Labor)	$ -	$ -	$ -	$ -	$ -	$ -
b. Fringe & Other Benefits	$ -	$ -	$ -	$ -	$ -	$ -
c. Training	$ -	$ -	$ -	$ -	$ -	$ -
d. Travel	$ -	$ -	$ -	$ -	$ -	$ -
e. Rent	$ -	$ -	$ -	$ -	$ -	$ -
f. Phone	$ -	$ -	$ -	$ -	$ -	$ -
g. Postage	$ -	$ -	$ -	$ -	$ -	$ -
h. Supplies	$ -	$ -	$ -	$ -	$ -	$ -
i. Technology/Equipment	$ -	$ -	$ -	$ -	$ -	$ -
j. Marketing/Advertising	$ -	$ -	$ -	$ -	$ -	$ -
k. Other (Direct Costs)	$ -	$ -	$ -	$ -	$ -	$ -
l. Subtotal of Direct Costs	$ -	$ -	$ -	$ -	$ -	$ -
m. Indirect Costs (Approved Indirect Cost Rate %age)	$ -	$ -	$ -	$ -	$ -	$ -
Grand Total (Year:___):	$ -	$ -	$ -	$ -	$ -	$ -

Please explain any negative (Actual >Budgeted) in this section.

Itemized Accounting of Actual vs. Budget

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

Allowable

- Be reasonable and allocable
- Conform to any limitations or exclusions set forth in the cost principles or the award
- Be consistent with policies and procedures afforded <u>all</u> activities of the organization
- Be accorded consistent treatment
- Be determined in accordance with GAAP
- Be adequately <u>documented</u>

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

OMB Omni Circular, Subpart E, §200.420 Considerations for selected items of cost.

- Establishes principles for determining allowability of costs
- Examples of costs expressly unallowable:
  - **§200.423 Alcoholic beverages.**
  - **§200.426 Bad debts.**
  - **§200.428 Collections of improper payments.**
  - **§200.434 Contributions and donations.**
  - **§200.435 Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements.**
  - **§200.438 Entertainment costs.**
  - **§200.441 Fines, penalties, damages and other settlements.**
  - **§200.442 Fund raising and investment management (unless prior written approval from the Federal awarding agency**

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

Allocable

- Treated consistently with other costs incurred for the same purpose in like circumstances
- Is incurred specifically for the award
- Benefits the award and other work and can be distributed based on benefits received, or
- Is necessary for the overall operation of the organization, although a direct relationship to a particular cost objective cannot be shown
- Shifting of costs between awards to overcome funding deficiencies is not allowed

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

Budgetary Line Item	Cost Principal Considerations	Minimum Assumption
Personnel	Rates are reasonable, meet grant requirements for experience, within executive compensation requirements, §200.430 Compensation: Personal Services	Include pay rate, labor category, # of hours, housing counseling years of experience
Fringe Benefits	Reasonable rate, allowable fringe pool, §200.431 Compensation—Fringe Benefits.	Fringe pool (accounts) and rate and effective date.
Travel	Reasonable (consistent with Federal Travel Regulations "FTR"), allowable purpose, allocable for HUD/OHC related activities, §200.474 Travel Costs	Purpose of travel, # of participants, itemized costs. Must be approved by HUD in advance of travel
Supplies	Allowable, allocable for HUD/OHC related activities, reasonable costs/quantity	Itemized list (including quantity, unit, rate), use/purpose, cost

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

Budgetary Line Item	Cost Principal Considerations	Minimum Assumption
Consultant Fees, Temporary Help	Allowable purpose, allocable for HUD/OHC related activities, reasonable rates	Purpose, rates, # of hours/fixed fee, services provided, procurement method
Training	Allowable under §200.474 Training and Education and §200.432 Conferences	Purpose, rates, # of hours/fixed fee, services provided
Equipment	Allowable consistent with §200.439 Equipment and other capital expenditures.	Itemized list (including quantity, unit, rate), use/purpose, cost
Meals	Allowable, allocable for HUD/OHC related activities, reasonable (consistent with per diem requirements under FTR)	Purpose, # of participants, itemized costs.

PREPARING A BUDGET

Step 3: Verify allowability, allocability and reasonableness

Budgetary Line Item	Cost Principal Considerations	Minimum Assumption
Occupancy	Allowable under §200.465 Rental costs of real property and equipment, for HUD/OHC related activities, reasonable (FMV)	Rationale/justification, allocation methodology (based on square footage for # of individuals working on HUD grant), FMV of rental costs
Stipends	Allowable under Omni Circular Subpart E, allocable for HUD/OHC related activities, reasonable and necessary	Purpose, rates, # of participants, services provided
All other proposed Costs (Postage, printing, delivery, etc.)	Allowable under Omni Circular Subpart E, allocable for HUD/OHC related activities, reasonable and necessary	Rationale/justification, costs, allocation methodology, purpose

PREPARING A BUDGET

Step 4: Internal review and budget submission

- Review with accounting verifying labor rates, fringe benefits and other costs
- Obtain indirect rate information
- Authorized individual must sign and date
- Include certification
- Unless otherwise stated, once submitted is considered the approved budget and draw down request should be based on approved budgetary line items:
  - After approval, request prior approval from HUD under 24 CFR Part 84 for any changes to the budgetary line items

200.208 Certifications and Representations

Certification statement for all annual financial reports and requests for payments:

"By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information or the omission of any material fact, may subject me to criminal civil or administrative penalties for fraud, false statements, false claims, or otherwise."

BUDGET NEGOTIATIONS

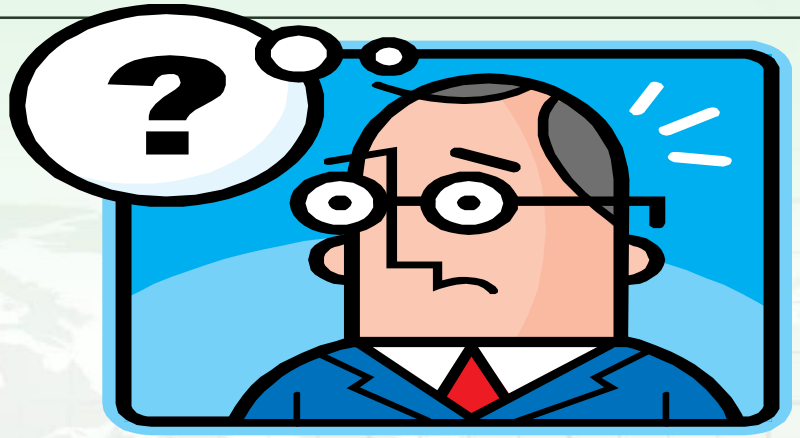
Step 5: Budget negotiations and approval

- Timely respond, in writing, to request for clarification, justification and/or additional information
- Submit an updated budget indicating "REVISED" signed and dated.
- Respond within a reasonable time to respond. Request a response time due date if not provided.
- All revised budgets should be signed and dated by authorized individual.
- Verify the final "Approved" budget with HUD POC, submit to accounting and maintain in permanent file.

THINGS TO REMEMBER

THINGS TO REMEMBER

- Review the approved work plan
- Read the OMB Omni Circular specifically Subpart E to understand cost principles
- Use an acceptable budget format
- Develop assumptions
- Communicate with accounting/finance on labor rates, fringe benefits and grant requirements
- Include required certification signed and dated by authorized individual
- Indicate "Approved" on the final budget; submit to accounting and keep in grant file.
- Do not hesitate to contact your HUD POC if you have any questions



FREQUENTLY ASKED QUESTIONS

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- **QUESTION** - What are the mechanics for charging staff expenses that occurred during the period of performance but before the grant was executed? For example, if an agency wants to charge the FY15 grant for staff expenses from January 2015. Would they need to amend their PARs/timesheets, or is there some other way they should document this?

- **ANSWER** - Grantees must do the following:
- Ensure that they accrue the actual costs in their general ledger preferably in their general (unrestricted assets) fund. The most important thing is that they do not accrue and/or charge the costs to another grant/program. For the FY15 grant, since they knew they were approved for funding under the multi-year NOFA, they could have set up the funding code/grant account for FY 15 and actually accrued the costs under that account while they awaited the announcement of the actual award amount.
- The grantee should also ensure that employees have timesheets and personnel activity reporting that support the costs for the actual activity billed that period.
- Their first cumulative report under the FY 15 grant must also report the hours associated with the costs and any HUD Form 9902 must also reflect the relevant activity.

FREQUENTLY ASKED QUESTIONS

- **QUESTION** - Does a grantee have to request prior written approval every time a counselor gets a raise, they hire a new counselor, etc. or would they only need to request prior written approval if the changes affect the line items of the approved budget or their performance plan?

- **ANSWER** - §200.308 of the Uniform OMB Circular states that any budget deviations must be approved, a change in the salary resulting in a reduction of the number of hours to perform the services would be considered a deviation and would require prior written approval. Prior written approval could be in the form of email communications between the grantee and its HUD Point of Contact, this is a normal practice. In addition, the grantee should have considered the salary increase when it completed its original budget and reflected it in the assumptions. It should not represent a material increase in workload but would facilitate better communications between the HUD Points of Contact (POC) and the grantee.

FREQUENTLY ASKED QUESTIONS

- **QUESTION** - What costs can be included as "Other (Direct Cost)" on line H of budget form SF-424?

- **ANSWER** §200.412, Classification of costs, of the Uniform OMB Circular states that "There is no universal rule for classifying certain costs as either direct or indirect (F&A) under every accounting system. A cost may be direct with respect to some specific service or function, but indirect with respect to the Federal award or other final cost objective. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently in like circumstances either as a direct or an indirect (F&A) cost in order to avoid possible double-charging of Federal awards. Guidelines for determining direct and indirect (F&A) costs charged to Federal awards are provided in this subpart." Accordingly, any direct costs that are not included in direct cost line items included on HUD SF -424 can be included on this line.

FREQUENTLY ASKED QUESTIONS

- **QUESTION** - What happens if actual costs only deviate from budgetary line items by 10%, is a budget modification still required?

- **ANSWER** - Under the OHC grant program, §200.308 of the Uniform OMB Circular that states any budget deviations must be approved applies and there is no discretionary budgetary deviation thresholds

- **QUESTION** - What are leveraged funds?

- **ANSWER** Not to be confused with Matching or Cost Sharing, leveraged funds are simply a financial commitment toward the costs of a project from a source other than the granting organization. Leveraging can be achieved by a commitment from the grantee or through various partnerships. Leveraged funds may be made in the form of cash or in-kind resources and must be identified, tracked and verifiable in the awardees' records.

Please forward any questions to

housing.counseling@hud.gov with

Submitting a Budget

in Subject line