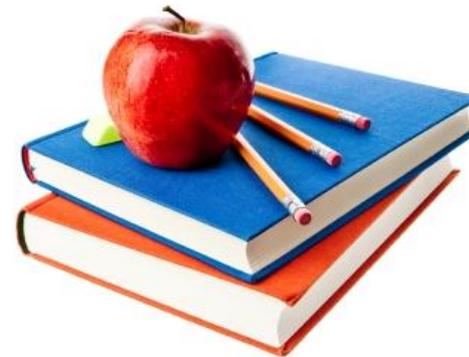


U.S. Department of Housing and Urban Development (HUD)
Office of Healthy Homes and Lead Hazard Control (OHHLHC)

FY13 Grantee Program Managers School

Test Prep



Test Prep

- Discussion and review of Grantee Reporting Requirements
- Preparing you Program for Monitoring and Audit



QPRS Reporting Requirements

- What should be included:
 - Narrative of all program strengths and challenges that may have been experienced during the quarter
 - Assessments
 - Fully Completed and Cleared Units Only
 - LOCCS approved that quarter
 - Units do not have to be invoiced to be claimed but must be fully cleared.
 - Benchmark changes:
 - Must be requested prior to the last month of the current quarter.

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Section 3 Reporting Requirements

- Send to your GTR
 - Due by January 10 each calendar year.
 - Separate form for each grant.
 - In Close Out Report (cumulative for grant POP)
- Plan for capture of data
 - Survey
 - Application of unit/contractor



Race and Ethnicity Report Form

- Due each year by January 10th
- Form
- Who should receive the report



A-133 Audit



Budget Reporting Requirements

- Quarterly
 - SF 425
 - Part 3
 - Match Documentation Form
 - Required for all 2011 and 2012 grantees (Encouraged for all other grantees).
 - Submitted with each quarterly report.



REPORTING FAQ SHEET

- Sample forms provided in tab as templates.
- Keep due dates for forms in your Outlook Calendar.
- Have multiple staff who understand and have access to reporting tools.
- Save links to resources/key documents on your search engine/browser.



Performance Review

- Desk Monitoring



Desk Monitoring

- What?
 - Whatever documents your GTR asks for!!
 - Unit files, LOCCS, Match
- When?
 - Annually (at a minimum)
 - Exception if on site visit occurred in the same year.
- Who?
 - Your GTR will be completing this activity.



Performance Review

- Desk Monitoring
- On Site Monitoring



On Site Monitoring I

- What?
 - Grantee is notified of upcoming days/time for visit.
 - Grantee is notified what needs to be reviewed during visit:
 - All program documents need to be available to OHHLHC staff, including LOCCS documentation and match.
 - Documents should not be at your subs or contractors offices
 - You are responsible for the final unit files
 - Understand how to generate reports and operate your data system(s)
- When?
 - OHHLHC aims to complete monitoring visits to each grantee during their POP.
- Who?
 - Possibly your GTR (based on availability)
 - It should not matter who visits, since the documentation should speak for itself. From the P and P to the final unit file and invoice, it tells a story of how your program operates in full compliance.

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On Site Monitoring II

- Where are key documents located?
 - Policies and Procedures/Work Plan
 - Procurement, Travel, and Conflict Resolution Policies required to be represented in these documents.
 - Priority matrix, income documentation requirements, and process flow are essential components.
 - Unit/Case files
 - In progress and/or completed work review
 - A valid LI/RA must support the scope, contract, and invoice
 - LOCCS Vouchers
 - Each line item should have invoices and salary expense reports that back up expenditures invoiced to OHHHLHC.
 - Match Funding
 - Source and use for each claim (regardless of year or form used).
 - If you claim it as match, you must be able to back it up.

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Performance Review

- Desk Monitoring
- On Site Monitoring
- Certification of Cost



Certification of Cost

- What?
 - An official response to an inquiry regarding ineligible activities (suspected or known).
 - Declares all unit files have been reviewed and all findings of ineligible costs have been disclosed in detail.
- When?
 - Most often in response to issues noted in any kind of file review:
 - LOCCS Review
 - Desk Monitoring
 - On-site Monitoring
- Who?
 - Performed by the grantee or any of their associated subs and contractors.
 - Response is validated by your GTR.

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Certification Response Validation I

- Your GTR will perform an audit of the response by randomly selecting units to validate.
 - GTR will request all documentation for these units within a specified time period.
- If the response is not validated the grantee may not be given credit for completing it.
 - GTR must be able to review the response.
 - Through email attachments or mailed hard copies.



Certification Response Validation II

- Discrepancies found in response may result in:
 - Additional file review
 - PD file review
 - Additional units included in ineligibility findings
- After response is validated by GTR:
 - Any ineligible amounts and/or units are accepted and the grantee moves towards reconciliation process.



Response Implications

- What happens after I complete the response and disclose all possible ineligible activities/costs?
 - Pay amount identified and due to OHHLHC for ineligible costs invoiced (including any pending invoices).
 - Only invoiced costs are due back to OHHLHC.
 - All documentation for non-invoiced units must be amended to reflect eligible OHHLHC amounts.



Response Implications

- An entire units(s) are deemed ineligible due to:
 - Use, Occupancy, Income, Age of home, Invalid/Expired LIRA report used for procurement work, NO Tier 2, NO final full clearance
 - Each unit address comes off total units completed, and/or assessed by quarter reported in
 - All cost associated with that unit is ineligible from intake to unit. Amount added to payback amount and or invoice is revised to show alternate funding as it is not eligible for invoicing after review finds it ineligible



Certification of Cost Spread Sheet

- OPTIONAL and provided only as a guide to your official preparation of response.
 - Summary chart reflecting Certification of Cost response
 - Used for response validation by program staff, use as a sequential check list
 - Will aid GTR in verification of response summaries
 - Can be used as the official response



Myth Busters

- You are not the first grantee to go through this process and have items to reconcile.
- This is not the time for finger pointing and assigning individual blame.
- Program history (how long your program has been operating in non-compliance) does not exempt non-compliance now.
- Suspension of Activities and/or High Risk designations may be necessary.
- Payback of invoiced ineligible cost is and will be pursued as applicable to each and every grant.
- Your GTR is your ally in this process and should be considered part of your team.

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Performance Review

- Desk Monitoring
- On Site Monitoring
- Certification of Cost
- Avoiding Ineligible Cost Tips



Avoiding Ineligible Cost Tips I

- Complete and well organized Unit/Case Files will help document compliance for:
 - Occupancy and use of building
 - Age of Child living in residence
 - Certification of visiting child
 - Income eligibility (<80/50 AMI)
 - COMPLETE LIRA in FULL COMPLIANCE (w/ DISCLOSURE notice)
 - SCOPE (distinguish what scope line items are being paid for by OHHLHC LHC, LHRD and HHS, HH vs. other partner programs that may be bid out at same time)
 - Review and approval recommended by prime
 - SHIPO/TIER 2
 - Estimated Cost for each unit by Prime/Sub Contractor

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Avoiding Ineligible Cost Tips II

- Procurement Process in Full
 - Open date, Bid due, opening of bid, # of bidders, lowest bidder, license/insurance, contract, Occupant Protection Plan
- Homeowner Contract/Relocation Documentation
 - Abatement Notice to State Regulating Agency
 - Notice to Proceed
 - Approval of Occupant Protection Plan
 - Even if you do not get a response, keep a record of your efforts in the case/unit files
 - Document somewhere in P and P what the issue is in your state and how the notification is to work in your state for compliance. Follow that always and support efforts with documentation.

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Avoiding Ineligible Cost Tips III

- Work start, work site monitoring by prime or sub (follow your policy)
- Clearance Assessment
 - Full or interim both need visual and samples.
 - Document what was not tested due to weather or for re-occupancy.
 - Document follow-up full clearance and place in file.
- Clearance Report
- Invoice, sign off and approval
- Payment, eligible match ongoing monitoring plan
- Follow up for HHS assessment, plan, justification, and interventions.

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Performance Review

- Desk Monitoring
- On Site Monitoring
- Certification of Cost
- Avoiding Ineligible Cost TIPS
- Keys to Success



Keys to Success

- Complete the Certification of Cost as a team.
- Be thorough as it will be verified and random units will be thoroughly reviewed.
- Submit all review documents in a timely manner.
- Work collectively with your GTR to resolve issues
- Communicate with your GTR for reconciliation of ineligible cost found, and to correct/update practices and protocols.
 - P and P review/update
 - Capacity Training
 - Unit File Checklist



Keys to Success

- If your doing it right, the documentation will speak for itself.
- Communicate with your GTR.
 - Preferably in email to maintain written records.
- Cooperate with your GTR to plan and complete all reconciliation items.
 - Minimize the future impact on program performance by identifying past issues, correcting protocols, and moving forward.

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Performance Review

- Desk Monitoring
- On Site Monitoring
- Certification of Cost
- Avoiding Ineligible Cost TIPS
- Keys to Success
- Consequences



Consequences of Non-Compliance I

- Failure to meet the terms and conditions of the following items may result in the grant being designated non-compliant in performance and/or contract:
 - Reconciliation Terms
 - Terms of High Risk Designation
 - Suspension of Activities Terms
 - Certification of Cost Submission and Validation
- Lack of response or refusal to acknowledge the requested action is considered non-compliance



Consequences of Non-Compliance II

- Consequences associated with a non-compliant grant include, but are not limited to:
 - Grant Award may be withdrawn entirely
 - Grantee may not be eligible for future awards from OHHLHC
 - Lack of Compliance and performance may impact other HUD Dollars going to the grantee agency:
 - CDBG, HOME, SECTION 8
 - Grantee may be placed on the Federal “Do Not Pay List”
 - Affects all Federal funding eligibility



Why are we looking so closely now?

- Monitoring visits have identified weaknesses in program documentation:
 - Ineligible costs to program for LHC dollars
 - Inconsistency in compliant program implementation
- Each Grantee deserves to be treated fairly:
(Common Standards/Measuring Stick)
 - It should not matter who's phone number you have, everyone deserves to be held to the same standards.
- Grantees must have clear communication on how to be successful and compliant.

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Performance Review

- Desk Monitoring
- On Site Monitoring
- Certification of Cost
- Avoiding Ineligible Cost TIPS
- Keys to Success
- Consequences
- **ACTIVITY**



Activity #6

- Place a wager on how well you know how to avoid ineligible cost. Place your wagered bucks in front of bucket on your table.
- Use the COC sample form to complete a thorough review for ineligible activity for the sample file in front of you.
- Review together:
 - Did you find any items to make the unit ineligible in whole?
 - Did you find any ineligible cost in the scope of work?

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TIPS!!!! YOU NEED TO KNOW!!

- Proof of:
Ownership, Age of home, Insurance and Rental License complete in unit file
- Contract Signed and complete in unit file on 03/08/13
- Date of tier 2 completion was 03/03/13
- CBI Clearance Date N/A for this unit
- Match, Relocation= 0\$
- Laundry Room= 100sq/ft

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BASIC UNIT INFORMATION

Project Street Number	Project Street Name	Zip	Date of Application
784	West Ave	22014	02/13/12
747	Sheet Metal Road	10220	Missing

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LEAD INSPECTION/RISK ASSESSMENT INFORMATION

Name of Lead Inspector	Date of Lead Insp/Risk Assess.	Paint Hazards Found (Yes/No)	Dust Samples Collected	Dust Hazards Found (Yes/No)	Soil Hazards Found (Yes/No)	Complete and Reviewed LIRA
<i>Mark Twain</i>	02/25/12	Yes	2/25/2012	Yes	n/a	3/3/2012
A Impressed	02/15/13	Yes	2/15/2013	Yes	No	Yes/NR

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BASIC UNIT ELIGIBILITY INFORMATION

Unit Type (Owner, Rental or Vacant)	Built Pre-1940	No. Occupants <6 Years	No. <6 Receiving Medicaid	No. All Other Occupants	Household Income	Less than 50% AMI 50% to 80% AMI	Section 106 Review Completed (Yes/No)	Tier 2 Checklist Completed	CBI Clearance Date
Owner	y	1	1	2	\$18,735	y	3/4/2012	3/4/2012	####
Rental	Y	1	Missing	2	\$36,100	Y	3/3/2013 NO Sign.	3/3/2013	N/A

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Unit Work Check List

Scope of work includes all hazards and is supported 100% by LIRA	Date of Contract	Name of Contractor	Date of Contractor's Lead Abatement License Expiration (copy of all licenses in unit file)	Date of notification to MDHSS	Clearance Date	Contractor's Invoice Date	Post-Abatement Report Filed	Date Payout Order Signed
4/23/2012	5/15/2012	<i>I Mean Well Construction</i>	08/06/14	05/18/12	06/09/12	06/12/12	6/16/2012	06/25/12
03/1/13-NO	3/8/2013	I Mean Well Construction	04/21/14	03/09/13	03/23/13	04/05/13	3/26/2013	04/15/13

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Fiscal Management

HUD Lead Grant LHC Costs	Match LHC Costs	Subtotal LHC Costs	Lead Grant Relocation Costs	Total Project Cost
\$12,527		\$12,527	\$0	\$12,527
\$17,271	\$0	\$17,271	\$0	\$17,271



Ineligible Cost Summary

Documentation supports unit as 100% éligible	Scope of Work includes only eligible activities for LHC funding lines	All hazards found included in scope	\$ Ineligible Cost From Scope of Work	\$ Ineligible Cost Invoiced	\$ Total Ineligible Cost Due Back to OHHLHC	\$ Remaining Eligible Cost Total
yesNo		Yes	\$2,500.00	\$2,500	\$2,500	\$10,027
NONO		YES	\$3170.00	\$3170.00	IF LOCCS	\$14,101.25

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Unit Eligibility: Findings

Missing Documentation

- Signature of Tier 2 Forms
- Clearance Address Wrong- Lists Owners address and not the LHC unit

RECOMMENDATION!

- LIRA was not reviewed by any second person

IF was not done at all:

- Entire Unit ineligible
- Entire Unit ineligible until a full clearance is performed and documented for the correct address

- NO Direct ineligibility due to this action
 - Not required but highly recommended



Ineligible Cost Findings:

Ineligible Activities from Scope:

- Dryer Vent
- Soil
- Laundry Room Floor
- Siding- Exterior Painting

Cost from Invoice Line Item

- \$70
- \$600
- \$800
- \$1700



Documentation Errors that need ATTN:

Issue

- NO Date of Application
- Medicaid Eligibility

Action Required

- Make a note on file that notes the date of application verification from another source
- Not a required component for OHHLHC but if part of your P and P to document than the info needs to be collected and stored with unit file.



Activity Result- HOW DID YOU DO?

- Some may not have many bucks left, others are really not wagering their own BUCKS but their program award if documentation does not support eligibility of unit and activities associated with the unit including LHC.
- Take care of your BUCKS! It is easy to pass them or wager with assumed confidence.

