Annual Performance Report(APR) Review

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Goals and Objectives

The objective for this training is that recipients will be able to better understand the CoC Program interim rule requirements and responsibilities related to Annual Performance Report Submissions.

- The goal of the training is to:
 - communicate how HUD reviews an APR
 - share how to reduce resubmissions
 - provide resources



Why are the APR submissions important?

Accurate APR submissions matter! And here's why:

- Every year representatives of HUD's various divisions are required to go to Congress to justify the Agency's requests for funding. The amount of funding allocated to the CoC program nationwide is based on the factual information we can present.
- ► Facts are based on accurate data and accurate data can only come from you...our Grantees. Our mission is to pass through funds to you so that you may serve disenfranchised populations effectively. Your APR reports are the tools from which we are able to aggregate hard numbers both by region and nationally of homeless persons being served, rates of expenditure and the success of the efforts that our Congressional allocations support. Your information is what allows us a basis on which to develop our yearly proposals for funding and for increases where needed.
- So, you need to accurately report what you have done. The value of your reporting is expressed in your expenditure rates, the number of people served, which categories of homelessness they are defined by and the results of your expenditures of public funds in terms of your outcomes. Continued funding depends on accurate data. In short, your reporting supports our ability to fund you at the highest rates possible so we can renew your grants each year. So, you need to help us help you by making your reports accurate. And THAT my friends, is why APRs matter.

About APRs

What is the APR?

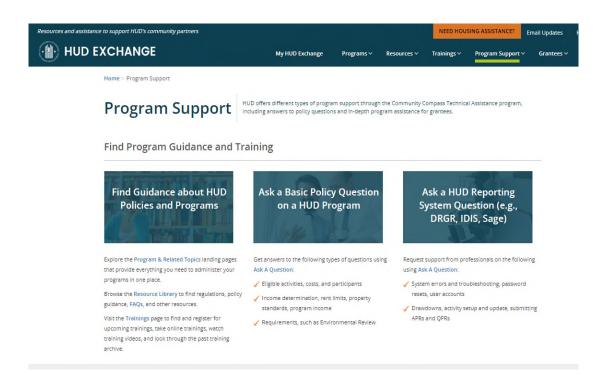
Where are APRs submitted?

What is the APR?

- ► Per 578.103(e), "the recipient must collect and report data on its use of Continuum of Care funds in an Annual Performance Report (APR), as well as in any additional reports as and when required by HUD."
- Recipients with HUD funding received through CoC homeless assistance are required to submit an Annual Performance Report (APR) electronically to HUD every operating year.
- ▶ Data collection for the APR is aligned with the most recent version of the Homeless Management Information System (HMIS) Data Standards.

FY 2022 HMIS Comparable Database Manual (released October 2021)

Where are APRs submitted?



- APRs are submitted and reviewed in HUD's Sage HMIS Reporting Repository.
- Recipients are required to submit APRs no later than 90 days after the expiration of the grant.
- If you have technical questions regarding the APR submission or the Sage system, please submit them to Ask A Question in HUD Exchange.

**We recommend that grantees consult the SAGE user guide and resource before submitting An Ask a Question on Sage and/or calling your Reps. PH-PSH Permanent Housing: Permanent Supportive Housing

PH-RRH Permanent Housing: Rapid Re-Housing

TH Transitional Housing

Joint TH-RRH Joint Transitional Housing and Rapid Re-Housing

SSO Supportive Services Only

HMIS Homeless Management Information System

Program Components

Sections of Housing APR







Bed/Unit Inventory



Program Eligibility



► Financial*

*Staff should talk to each other before submitting the APR. Sometimes the program staff submits the APR and then the financial staff submits a voucher after the submission of the APR. Please ensure the APR is submitted after verification that all vouchers have been completed.

Other Annual Performance Reports

Homeless Management Information System (HMIS) Project

Supportive Services Only (SSO) Project

Planning Grant

Homeless Management Information System (HMIS) Project



► Timeliness - If the initial submission is late, then the Grantee must provide an explanation for the untimely submission. This can be done via email or under "Additional Comments."



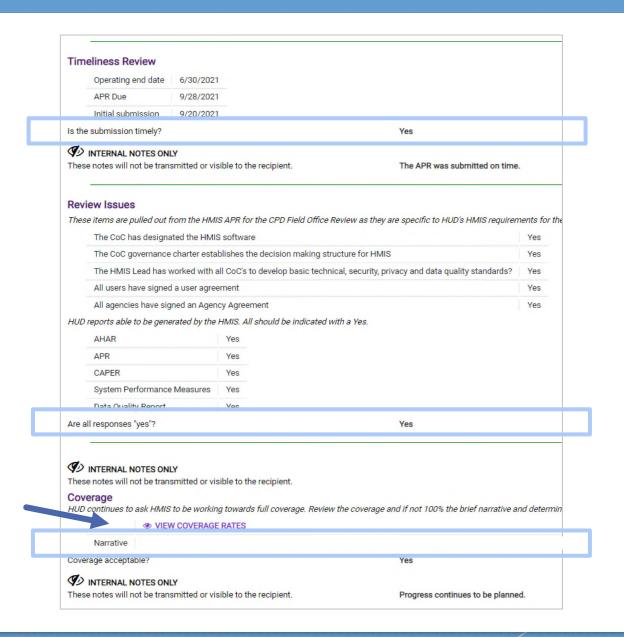
Issues - All responses should be marked "Yes." If not, the Grantee must provide an explanation under "Additional Comments."



Coverage - If not 100%, Grantee must provide a brief narrative on how progress continues to be planned.

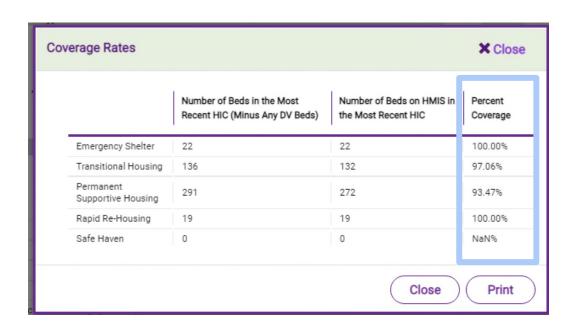


► Financial - The difference between the APR total and LOCCS total must be \$0. The 25% match requirement must be met.

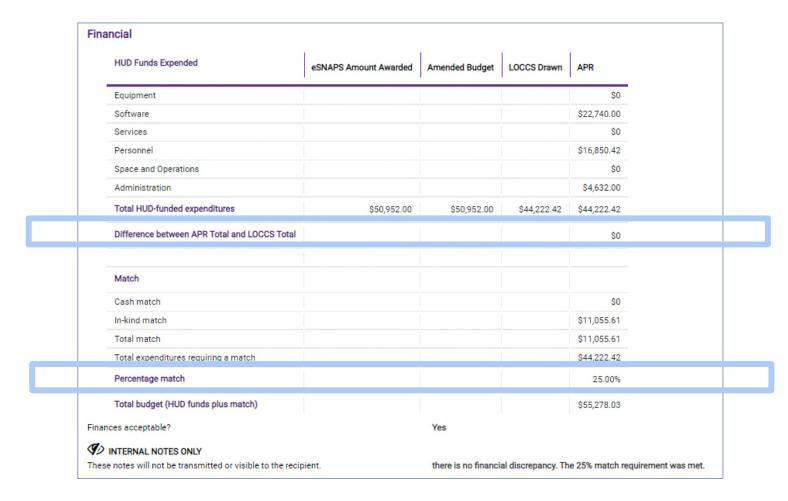


*HUD continues to ask HMIS to be working towards full coverage. Review the coverage and if not 100%the brief narrative and determine if progress continues to be planned.

SAGE Screenshot



*HUD continues to ask HMIS to be working towards full coverage. The coverage is not 100% here, therefore HUD will use the brief narrative to determine if progress continues to be planned.



*The difference
between the APR and
LOCCS column should
be \$0. The LOCCS
drawn column shows
the amount the agency
expended while the
APR column represent
the agency's internal
financial records.

Supportive Services Only (SSO) Project



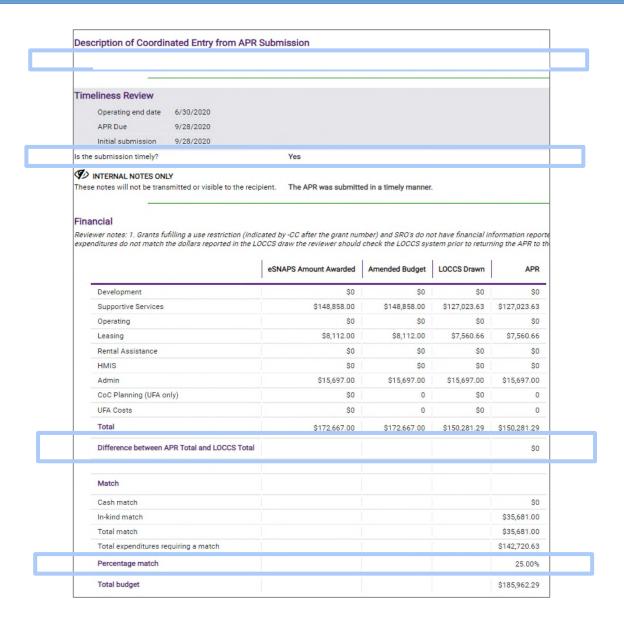
Description of Coordinated Entry (CE) -Grantee needs to provide a description of its CE process.



Timeliness - If the initial submission is late, then the Grantee must provide an explanation for the untimely submission.



► Financial - The difference between the APR total and LOCCS total must be \$0. The 25% match requirement must be met.



*Grantees should provide a Description of the Coordinated Entry Process in the APR Submission.

SAGE Screenshot









Timeliness

If the initial submission is late, then the Grantee must provide an explanation for the untimely submission.

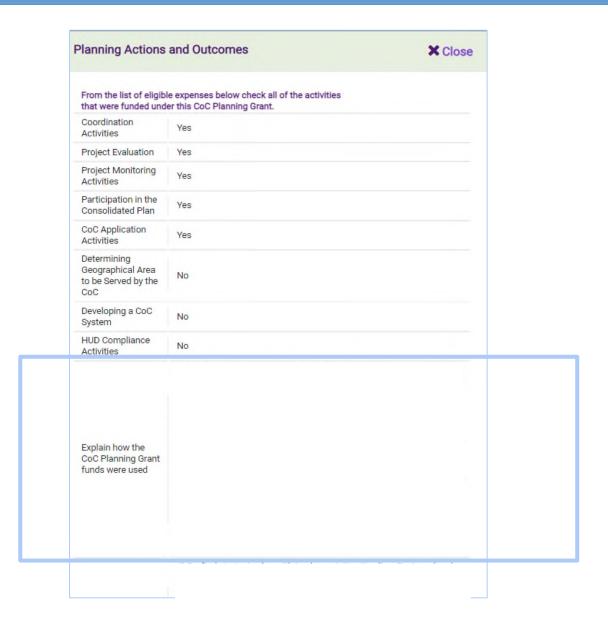
*Planning Actions & Outcomes

The Grantee needs to explain how funds were used and provide an explanation of outcomes.

Financial

The difference between the APR total and LOCCS total must be \$0. The 25% match requirement must be met. *Grantee should check the original grant application to see which actions were marked "yes." The APR should match the grant application. If not, the grantee needs to provide a reasonable explanation

Planning Grant



*The grantee needs to provide an explanation of how funds were used and describe the outcomes your CoC observed as a result of the CoC Planning Grant.

SAGE Screenshot

Financial

Activities	Activities Funded in Award	e-snaps Amount Awarded	LOCCS Drawn	HUD Dollars Expended
Coordination Activities	~			\$23,378.77
Project Evaluation	~			\$5,787.50
Project Monitoring Activities	~			\$2,207.50
Participation in the Consolidated Plan	~			\$840.75
CoC Application Activities	~			\$16,931.75
Determining Geographical Area to be Served by the CoC				\$0
Developing a CoC System				\$0
HUD Compliance Activities				\$0
Total		\$98,434.00	\$49,146.27	\$49,146.27
Difference between APR Total and LOCCS Total				S
Match				
Cash Match				SC
In-Kind Match				\$14,954.23
Total Match				\$14,954.23
Total Expenditures Requiring a Match				\$49.146.27
Percentage Match				30.439
Total budget (HUD funds plus match)				\$64,100.50
ng activities matched proposed?	Yes			
es acceptable?	Yes			

*The APR should reflect that only planning activities funded in the award were administered. If not, the grantee needs to provide a reasonable explanation.

SAGE Screenshot

Timeliness

- Submissions are considered timely if they are submitted by the due date.
- If the initial submission is late, then the grantee must provide a reasonable explanation for the untimely submission.
- This can be done via email or under "additional comments."
- Please note: For the purposes of timeliness, HUD looks at the initial submission date.

Timeliness Review

Is the submission timely?

Operating end date	6/30/2021	
APR Due	9/28/2021	
Initial submission	9/20/2021	

Yes

Bed/Unit Inventory and Utilization

BED/UNIT INVENTORY AND UTILIZATION

A review of the Bed and Unit Inventory in the APR by the CPD Representative will consist of the following elements:

- 1. <u>Element 1: Inventory</u>- compare the proposed inventory stated in the grant application against the actual inventory made available with grant funds during the period of performance.
- 2. <u>Element 2: Utilization</u>- Then, compare the actual inventory against the actual number of persons/households served throughout the grant year.

ACTUAL INVENTORY 🕮 🗠





As Proposed in the Application		Occupied AND Available for Occupancy As Completed in the APR by the Recipient					Completed in the APR by the Recipient		Average % of Actually Available to
Total	January	January April July October							

- ▶ The number of beds and units identified in the grant application and submitted in e-snaps. These represent the number of beds/units funded under the award.
- ▶ Neither the Grantee, nor the CPD Rep, can modify the proposed inventory (unless a formal amendment is made), this information is sourced from esnaps.

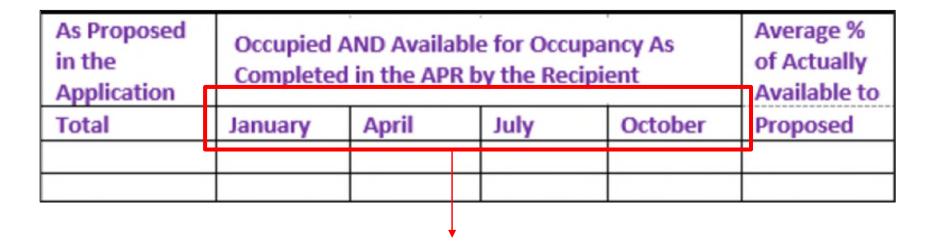




As Proposed in the Application	Occupied Complete	Average % of Actually Available to			
Total	January	April	July	October	Proposed
		•		,	

- ► This data is manually entered by the Grantee.
 - ▶ Occupied means a unit which has persons residing within the unit (Count each unit and bed)
 - ► <u>Available for occupancy</u> means a unit which is "readily available" to be occupied.

^{**}The number generally should be the same number as what was proposed, unless there is an over-capacity project where the grantee is overserving or a scattered site program that is renting to the dollars.



▶ Point-in-time snapshot- enter in the inventory data as it was on the last Wednesday of each month.

ACTUAL INVENTORY 🕮 🗠





As Proposed in the Application	Occupied / Completed	Average % of Actually Available to				
Total	January	January April July October				

- Sage will automatically calculate the project's Average. The Average is calculated as follows: Sum of all the months and divided by 4 to create the average occupied and available. Divide the average occupied and available by the number proposed in the application and the resulting percentage will be the Average.
- ▶ Whenever the actual inventory is less than 100%, there must be comments provided by the grantee.
- ▶ If the Grantee does not populate accurate inventory data, then there will not be an accurate utilization rate calculated in the next section of the APR.

HOUSEHOLDS/PERSONS SERVED Min 🖺





	ACTUAL UNITS	HOUSEHOLDS SERVED	UTILIZATION (HOUSEHOLDS SERVED / ACTUAL UNITS)
January			
April			
July			
October			
		-	1
	ACTUAL BEDS	PERSONS SERVED	UTILIZATION (PERSONS SERVED / ACTUAL BEDS)
January			
April			
July			
July October			

Represents the number of units/beds occupied AND available for occupancy as reported by the recipient in the Bed and Unit Inventory and Utilization form of the APR. The column equals the information discussed in the previous chart.

HOUSEHOLDS/PERSONS SERVED Min E





	ACTUAL UNITS	HOUSEHOLDS SERVED	UTILIZATION (HOUSEHOLDS SERVED / ACTUAL UNITS)
January			
April			
July		-	
	ACTUAL BEDS	PERSONS SERVED	UTILIZATION (PERSONS SERVED / ACTUAL BEDS)
January			
January April			

Number of persons/households actually served is sourced from HMIS (or comparable system)

HOUSEHOLDS/PERSONS SERVED MM E





	ACTUAL UNITS	HOUSEHOLDS SERVED	UTILIZATION (HOUSEHOLDS SERVED / ACTUAL UNITS)
January			
April			
July			
October			
	ACTUAL BEDS	PERSONS SERVED	UTILIZATION (PERSONS SERVED / ACTUAL BEDS)
January			
April			
July			

- The utilization rate is the ratio of the persons/households served to the actual units, expressed as a percentage.
- CPD Notice issued in September 2014 determined these utilization rates:
 - Transitional Housing- 80% utilization rate
 - Permanent Housing- 85% utilization rate

Example of Incorrect Reporting

Bed and Unit Inventory

Proposed to Actual Inventory

Reviewer note: If the proposed inventory is blank it was not received by Sage from e-snaps. The reviewer should check the application in e-snaps. The recipient cannot enter the proposed information in the APR. Thus, the reviewer will need to calculate themselves.



Persons/Households Relative to Available Inventory

Reviewer note: This inventory compares the number of units and beds actually available on the last Wednesday of the month to the number of households and persons served at the same four points in time. The units and beds come from the recipies bed/unit inventory in the APR and the number of persons served comes from the CSV upload of persons served as reported in HMIS.



The numbers should be 100 units and beds for all 4 quarters.

Example of Over-Capacity Project

Bed and Unit Inventory

Proposed to Actual Inventory

Reviewer note: If the proposed inventory is blank it was not received by Sage from e-snaps. The reviewer should check the application in e-snaps. The recipient cannot enter the proposed information in the APR. Thus, the reviewer will need to calculate the percentages themselves.

	As Proposed in the Application	Occupied AND Available for Occupancy As Completed in the APR by the Recipient January April July October Average % of Actually Available to Propo				
Units	40	69	73	74	73	180.63%
Beds	40	69	73	74	73	180.63%

Persons/Households Relative to Available Inventory

Reviewer note: This inventory compares the number of units and beds actually available on the last Wednesday of the month to the number of households and persons served at the same four points in time. The units and beds come from the recipient's completion of the bed/unit inventory in the APR and the number of persons served comes from the CSV upload of persons served as reported in HMIS.

	Actual Beds	Persons Served	Utilization (Persons Served / Actual Beds)
January	69	69	100.00%
April	73	73	100.00%
July	74	74	100.00%
October	73	73	100.00%

Recipient's Comments on Differences

***We added units to this project over the years without requesting additional funds. So, we have more units dedicated to the project than what's in the application.

Program Eligibility

Eligibility Per Component Type

	Р	SH*	RRH	TH	SSO
	New±	Renewal			
Category 1 Literally Homeless	х	х	X**	Х	Х
Category 2 At Imminent Risk				Х	Х
Category 3 Homeless under other federal programs	* No CoC was approved to serve Category 3 with FY 2019 CoC Program Funds				
Category 4 Fleeing domestic violence, etc.	х	x	x	х	х

[±] Requires chronic homeless status

^{*} Requires a disability

^{**} Must be residing on the streets or in an emergency shelter

ELIGIBLE HOMELESS SITUATIONS

Program Eligibility

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Homeless Situations					
Emergency Shelter	5	2	0	0	3
Transitional Housing	0	0	0	0	0
Place not Meant for Human Habitation	2	1	1	0	0
Safe Haven	1	0	0	0	1
Interim Housing	0	0	0	0	0
Institutional Settings	0	0	0	0	0
Other Locations	9	5	1	1	2
Total	17	8	2	1	6

VIEW FULL TABLE

OTHER LOCATIONS

Other Locations					1
Permanent housing (other than RRH) for formerly homeless persons	0	0	0	0	0
Owned by client, no ongoing housing subsidy	0	0	0	0	0
Owned by client, with ongoing housing subsidy	0	0	0	0	0
Rental by client, with RRH or equivalent subsidy	0	0	0	0	0
Rental by client, with HCV voucher (tenant or project based)	0	0	0	0	0
Rental by client in a public housing unit	0	0	0	0	0
Rental by client, no ongoing housing subsidy	1	1	0	0	0
Rental by client, with VASH subsidy	0	0	0	0	0
Rental by client with GPD TIP subsidy	0	0	0	0	0
Rental by client, with other housing subsidy	0	0	0	0	0
Hotel or motel paid for without emergency shelter voucher	2	1	0	0	1
Staying or living in a friend's room, apartment or house	3	0	1	1	1
Staying or living in a family member's room, apartment or house	3	3	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	0	0	0	0	0
Subtotal	9	5	1	1	2
Total	17	8	2	1	6

► For PH grants, clients coming from "other locations" is not permissible (except for DV clients). The Grantee must provide comments to explain, if there are no comments provided then the CPD Rep will reject the APR.

Financial Section

It's time for a ...



- 1. Financial information is required for every APR.
- 2. It is not necessarily expected that the financial expenditures of HUD funds shown on the APR match the funds drawn on the grant from the LOCCS system.



- 3. During the reconciliation period, you can incur admin costs from outside of the period of performance.
- 4. Grantees must record all cash and in-kind match expended on this project, including if the recipient expended more match than was required



1. Financial information is required for every APR. TRUE

(This was an easy question to get everyone warmed up.)

2. It is not necessarily expected that the financial expenditures of HUD funds shown on the APR match the funds drawn on the grant from the LOCCS system. FALSE

LOCCS and the APR must match. We will cover this later. This is why we are here to learn.



3. During the reconciliation period, you can incur admin costs from outside of the period of performance. FALSE

Only expenditures for activities that occurred prior to the expiration of the grant can be drawn in the reconciliation period.

4. Grantees must record all cash and inkind match expended on this project, including if the recipient expended more match than was required. TRUE

So ... Let's get into it! Finances!



What is HUD looking at for Financial Information? Does this look familiar?

Very often, HUD's access view and the Grantee's access view are very different in the various online HUD systems.

This is not the case in Sage. Grantees and HUD have an almost identical view and therefore working together to troubleshoot problems can be much easier than we think.

(Shall we begin?)

Development		HMIS	
Acquisition	0	Equipment (Server, Computers, Printers)	652.85
Rehabilitation	0	Software (Software Fees, User Licenses, Software Support)	0
New Construction	0	Services (Training, Hosting, Programming)	0
Development Subtotal	0.00	Personnel (Costs Associated with Staff)	97.15
		Space and Operations	0
Supportive Services		HMIS Subtotal	750.00
Assessment of Service Needs	0		
Assistance with Moving Costs	0	Leasing, Rental Assistance, and Operating	
Case Management	19,244.64	Real Property Lessing (Does Not Require Match)	0
Child Care	0	Short /Medium-Term Rental Assistance	0
Education Services	0	Long-Term Rental Assistance	31,258.35
Employment Assistance	0	Operating Costs	0.00
Food	0	Leasing, Rental Assistance, & Operating Subtotal	31,258.35
Housing /Counseling Services	0		31,200.30
Legal Services	0	Administration	
Life Skills	0	Administration	
Mental Health Services	0	Administration	3,593.82
Outpatient Health Services	0	Administration Subtotal	3,593.82
Outreach Services	0		
Substance Abuse Treatment Services	0		
Transportation	0	Total Expenditures	54,846.81
Utility Deposits	0		34,040.01
Operating	0	Match	
Supportive Services Subtotal	19,244.64	Cash Match	17,453.99
		In-Kind Match	400.00
			400.00
		Total Match	17,853.99
		Total Expenditures Requiring a Match	54,846.81
		Percentage Match	32.55%
		Total Budget (Expenditures Plus Match)	72,700.80

This is what HUD is looking at ... let's go through the columns.

	eSNAPS Amount Awarded	Amended Bud	lget	LOCCS Drawn	APR
Development	\$0		\$0	\$0	Т
Supportive Services	\$22,150.00	\$22,150	0.00	\$12,446.11	\$12,44
Operating	\$2,209.00	\$2,200	9.00	\$1,336.28	\$1,33
Leasing	\$73,511.00	\$73,51	1.00	\$73,511.00	\$73,51
Rental Assistance	\$0		\$0	\$0	
HMIS	\$4,850.00	\$4,850	0.00	\$2,171.82	\$2,17
Admin	\$6,735.00	\$6,73	5.00	\$1,121.88	\$1,12
CoC Planning (UFA only)	\$0			\$0	
UFA Costs	\$0			\$0	
Total	\$109,455.00	\$109,45	5.00	\$90,587.09	\$90,58

- 1. e-SNAPS Amount Awarded indicates what was awarded to the Grantee at award time.
- 2. Amended Budget reflects any amendments made by the Field Office and changed in LOCCS.
- LOCCS Drawn reflects the amount of funds drawn (as of the date the grant information was updated on shown in Grant and Project Information).
- APR shows the expenditures from the APR form completed by the recipient. There is a line
 that calculates the difference between the APR Total and the LOCCS Total.



LOCCS and APR must match

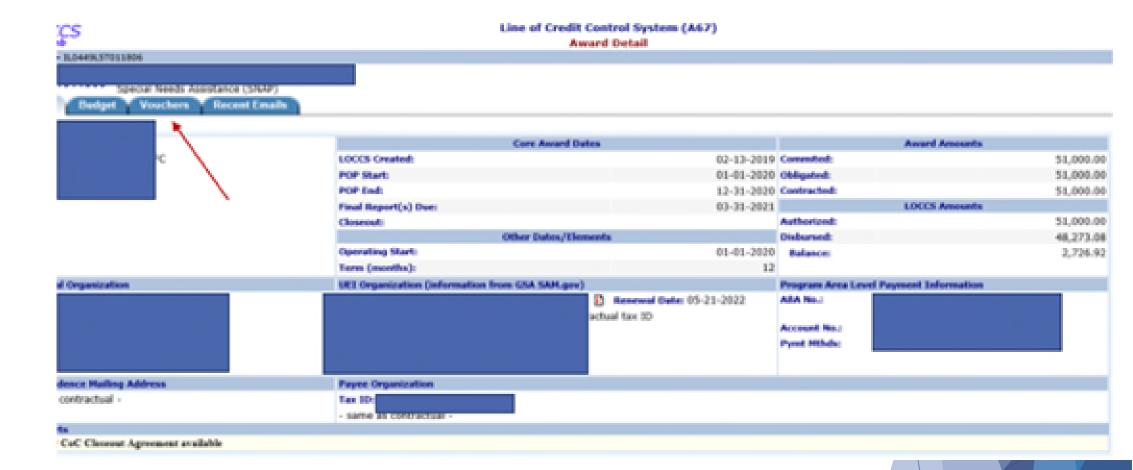
	eSNAPS Amount Awarded	Amended Budget	LOCCS Drawn	APR
Total	\$51,000.00	\$51,000.00	\$28,502.56	\$48,273.08
Supportive Services	\$8,328.00	\$8,328.00	\$4,143.82	\$8,328.00
CoC Planning (UFA only)	\$0		\$0	
UFA Costs	\$0		\$0	
Rental Assistance	\$0	\$0	\$0	\$0
HMIS	\$0	\$0	\$0	\$0
Operating	\$3,535.00	\$3,535.00	\$508.88	\$3,399.58
Development	\$0	\$0	\$0	\$0
Leasing	\$36,078.00	\$36,078.00	\$23,080.00	\$35,020.00
Admin	\$3,059.00	\$3,059.00	\$769.86	\$1,525.50
Difference between APR Total and LOCCS Total				\$-19,770.52

What if there are differences between the budget line items in the LOCCS and APR's totals?

Grantees must check both LOCCS and the APR to determine if there is a reasonable explanation for the differences.

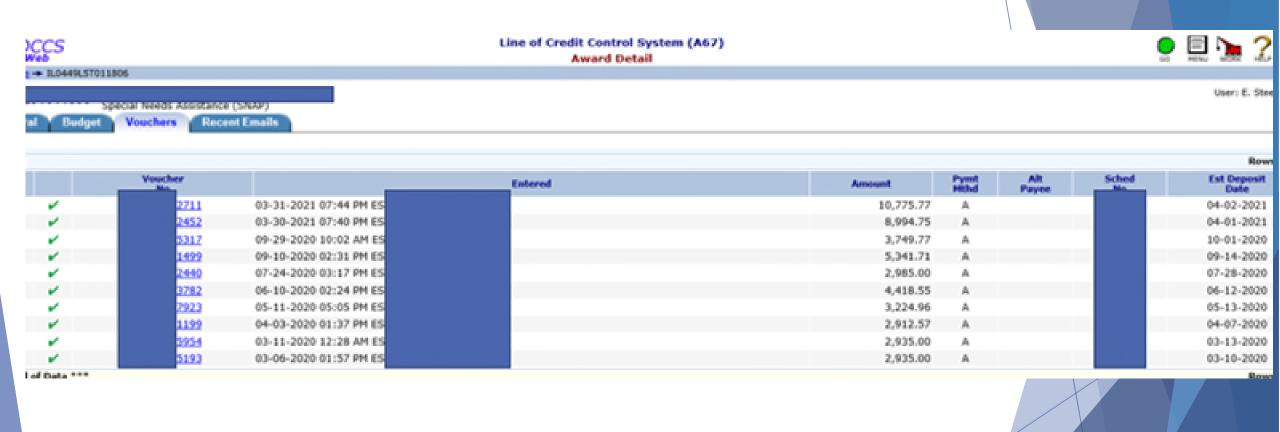
For example:

What if there are differences between the LOCCS and APR's totals?



Open LOCCS ... Click on Vouchers ...

Now ... take a look at the vouchers listed

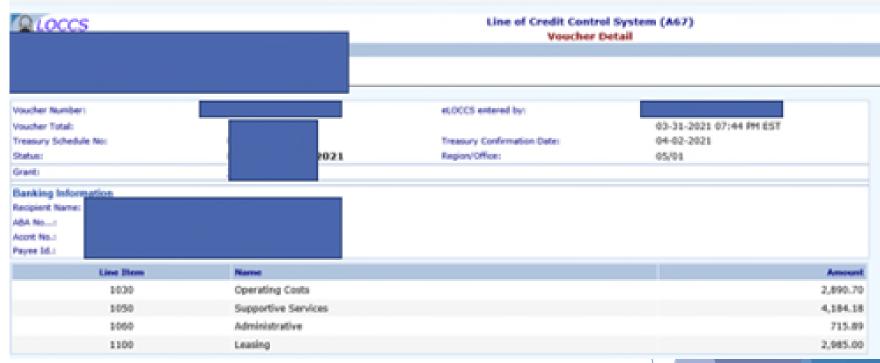


Remember ... the difference between the LOCCS and the APR = \$19,770.52

Are there any outstanding vouchers which may not have been disbursed into the local account included in the APR?

Sched No	Est Deposit Date
	04-02-2021
	04-01-2021
	10-01-2020
	09-14-2020
	07-28-2020
	06-12-2020
	05-13-2020
	04-07-2020
	03-13-2020
	03-10-2020

Are there any outstanding vouchers which may not have been disbursed into the local account included in the APR?





The answer is: YES!

Difference between LOCCS and APR explained:

```
$-19770.52
```

- +\$10,775.77 (voucher: XXX-XXXX2711 est. 04/02/21)
- +\$8,994.75 (voucher: XXX-XXXX2452 est. 04/01/21)

If there is no reasonable explanation for the difference, the grantee may have an input error that needs to be corrected.

Uh oh... What if the APR is due before the deposit date in LOCCS?

Core Award Da	ates
LOCCS Created:	02-13-2019
POP Start:	01-01-2020
POP End:	12-31-2020
Final Report(s) Due:	03-31-2021

Est Deposit Date

04-02-2021

04-01-2021

- ✓ Submit your APR so the report is note late.
- ✓ Make sure you leave a comment in the Financial Section explaining the difference between LOCCS and the APR.
- ✓ The CPD Rep may reject your submission and require submission after the deposit goes through, however ... your report will not be considered late.

Other IMPORTANT Financial "Stuff and Things" to remember when submitting the APR ...

Grantees have 90 days following the period of performance end date to submit the APR. Likewise, grantees have 90 days to reconcile and submit any vouchers for activities performed during the period of performance.

TIP for New Folks: You will hear the terms "period of performance" and "reconciliation period" a lot.

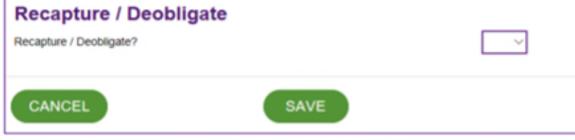
- The Period of Performance is the start date of the grant through the expiration date of the grant.
- The Reconciliation Period is the 90 days following the date of grant expiration.
- Please note: The Fort Worth Accounting Office closes sometime around September
 24 for yearly reconciliation and does not reopen until early October.

What happens if there are unspent funds?



- ► After the APR is submitted, HUD staff returns to LOCCS and checks the grant to determine if there is an **outstanding** balance.
- ► At this point in the grant cycle, 90 days have passed since the end of the Period of Performance (expiration of the grant).
- ► Following the Reconciliation Period, unused funds are subject to de-obligation/recapture by HUD.

IMPORTANT to remember during the Reconciliation Period: The grantee cannot charge for admin incurred outside of the period of performance.



De-obligate/ recapture of Unused Funds

At this point, HUD can determine that the LOCCS and APR amounts either match or can be accurately justified. Furthermore, HUD has determined that match has been accurately reported and is acceptable.

Before we leave Financials ...

Three Quick but important topics to talk about:

- Match
- Repayment of Funds
- Program Income

Let's have a conversation about Match?

- ▶ All grant funds must be matched with an amount no less than 25 percent of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. The only exception to that rule is leasing.
- Match is actual cash or in-kind resources.
- Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources.
- According to § 578.73, in CoCs where there is more than one recipient, the recipient must provide match on a grant-by-grant basis.

EXAMPLE A

Total amount requested from HUD (without leasing)

- Rental Assistance funding = \$95,000
- Project Administration funding = \$5,000
- Total amount requested = \$100,000

Total amount requested from HUD x .25 = Minimum Match Requirement

\$100,000 x .25 = \$25,000

EXAMPLE B

Total amount requested from HUD (with leasing)

- Leasing funding = \$40,000
- Supportive Services funding = \$55,000
- Project Administration funding = \$5,000
- Total amount requested = \$100,000

Total amount requested from HUD, excluding amount requested for leasing

\$100,000 (Total Amount Requested) - \$40,000 (Leasing Funding) = \$60,000

Total amount requested from HUD \times .25 = Minimum Match Requirement

\$60,000 x .25 = \$15,000

▶CoC recipients report the match committed to the grant during the operating year. Currently, match is cash or in-kind resources contributed to the grant and expended on eligible costs.

How does Match factor into the APR?

- ▶For specific match requirements review the NOFA for the year the project applied for funding. The recipient must record all cash and in-kind match expended on this project, including if the recipient expended more match than was required.
- Sage will automatically calculate the percentage of match. It will calculate the total match divided by the total expenditures (minus any funds expended on leasing costs, which do not require a match).

Match			
Cash match		\$5,651.93	
In-kind match		\$0	
Total match		\$5,651.93	
Total expenditures requiring a match		\$17,076.09	
Percentage match		33.10%	
Total budget		\$96,239.02	

Repayment of Funds

Repayment of funds requires coordination with the CPD Rep and the CPD Financial Analyst.

Funds may be sent to HUD either by wire transfer or by check





Program Income:

In accordance with 24 CFR 578.97:

- Program income is defined as the income received by the Grantee or subrecipient directly generated by a grantsupported activity.
- Program income earned during the grant term shall be retained by the Grantee and added to funds committed to the project by HUD and the Grantee, used for eligible activities in accordance with the requirements of this part.
- Costs incident to the generation of program income may be deducted from gross income to calculate program income, provided that the costs have not been charged to grant funds.

Program Income is rare in CoC Grants and to consult with your CPD Rep in the case of PI reporting in the APR.

Field Office Review

Grantee APR Review Form

► https://files.hudexchange.info/resourc
es/documents/sage-coc-apr-guidebookfor-coc-grant-funded-programs.pdf



CoC APR Guidebook

For APRs submitted in Sage

Version 6 October 2021



The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law, and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Grantee APR Review Form



Performance Accomplishments

Additional Comments(Optional but Strongly Encouraged)



Date For submission dated

1/13/2022 8/1/2020 - 7/31/2021

Please provide any additional comments on other areas of the APR that need explanations, such as a difference in anticipated and actual program outputs or bed utilization:

Grantee APR Review Form Cont.

Sag	HMIS REPOSIT	PORTING ORY													
	ual Performar	nce Report	FY2022 -	CSV up	load only	,									
Grant															
004a: Proje	et Identifiers in HMI	8													
Organizati Name		Project Name	Project ID	HMIS Project Type	Method for Tracking ES	Affiliated with a residential project	Project IDs of affiliations	CoC Number	Geocode	Victim Service Provider	HMIS Software Name	Report Start Date	Report End Date	CSV Exception?	Uploaded via emailed hyperlink?

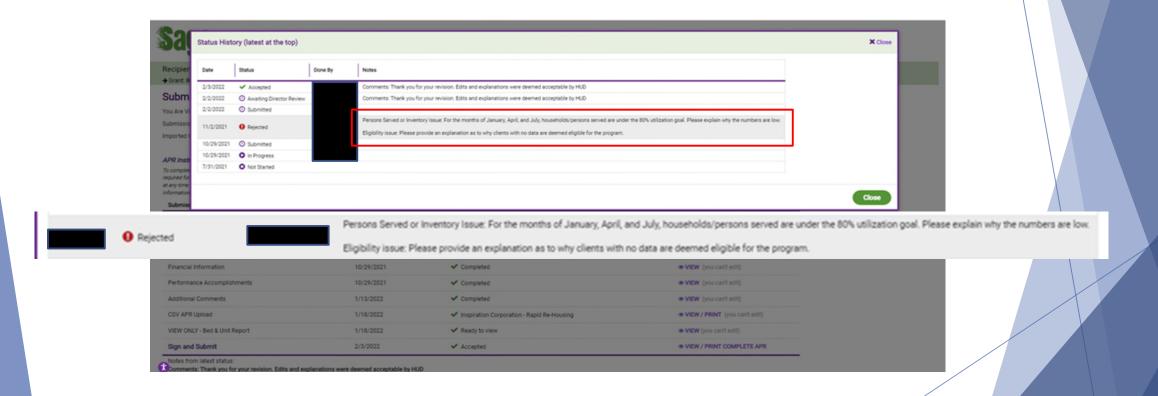
- CSV APR Upload
 - Begins with Q4
 - SAGE will not accept manual data entries
 - Expected to be generated by HMIS or comparable database

An APR can receive the following decisions:

- ➤ 1. Accepted the APR review is complete and the CPD Rep has accepted the information and has no further comments to provide to the Grantee.
- ➤ 2. Accepted with Comments the APR review is complete and the CPD Rep has accepted the information but has comments to share with the Grantee.
 - > Examples of Comments:
 - > The APR was submitted 2 months late. APRs are due within 90 days of the end of the operating year. Late submissions may be considered as part of a capacity review.
 - The APR was rejected three times before the Grantee was able to correctly document expenditures and match. The financial information presented in the APR should be reviewed by the Grantees' financial staff prior to submission to HUD and should reflect the actual HUD expenditures and LOCCS draws along with all required match.
- ➤ 3. Not Accepted Must Resubmit the submitted APR was incomplete or incorrect. The CPD Rep needs more information on a particular issue identified from their review. The Grantee will need to resubmit the APR submission with the requested information.

How to Avoid Resubmissions

- > Pay attention to the comments written by the CPD Rep.
- Make sure you review all the comments your Rep provided in the rejection.



Make necessary edits and provide explanations, as requested.

 Correct all the issues. If you resubmit an APR without addressing all comments and correction, it will be rejected again.

- > Resubmit the APR once **ALL** corrections and comments are made.
- If you are unsure of an issue or request, reach out to your Rep. Your Rep will further explain and if needed schedule a call to answer any questions or do a screen share with you.

Some Reps will follow up with you via email with some screenshot of the issues and specific request or information needed to approve. Please read thoroughly and make sure each section in the email is addressed in your resubmission.

Hello,	
	PR was rejected. I am including screenshots of the issues that need to be resolved and a short explanation for each screen.
1.	
	Testing beautiful distributions and the second of the seco
	### Company of the Co
	Proposed to Actual inventory: your organization proposed 17 units and 40 beds. The actual availability of units went down, but your bed count remains the same. We need an explanation as to what happened.
	Jtilization rate: You have 40 available beds, but only served 28 clients in the last two quarters. We need an explanation as to why.
	Parada The Third Control of the Control of the Angel Control of the Ang
2	The control
	Name of the Control o
	There 2-107 **Comparation of Part
	Final College Transmitter Contract Transmitter Cont
	inancial issues. Your LOCCS Drawn and your APR columns do not match. These two need to be the same. Your organization needs to review their financials and make sure they are matching LOCCS. In this case, you have on your APR columns \$488,570
	coming out from Supportive Services, when in LOCCS, you only draw \$318,370 for Supportive Services and the other \$170,200 from Operating. These numbers need to be revised and the APR needs to be resubmitted with the correct information.
2	Propositigating Note West-Childre West-Child
3.	Towards Nationals Towards Natio
	Morkson 8 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9
	Model III II I
	We will the set of the
	rinally, clients coming from "Other Locations" are usually not eligible. Your organization is reporting 46 clients coming from Other Locations. You need to explain why these clients were deemed eligible. This is particularly important if your organization is
	monitored in the future.
I hope	this helps. Let me know if you have any additional questions.

> Some Reps will send email a few days or weeks before the submission deadline as a reminder of eligibility issues and financial issues. See example below.

Good afternoon Grantee,

This email serves as a friendly notification that the APR for grant _____(number) is **due on 00/00/2022**. Please let me know if the agency plans to make a timely submission. If not, please provide an explanation.

Please note:

- For the Proposed to Actual Inventory section, HUD is asking how many units/beds were available, regardless of if they were occupied. So, we should see the same numbers as proposed in the application. Unless the agency did not have units/beds available. If this is the case, we need an explanation for why those units were not made available.
- For <u>Bed Utilization Rates and Unit Utilization Rates</u>, they must meet the National Benchmark for TH 80% and PSH 85%. If the rates do not meet the national benchmark, the agency must provide a reasonable explanation.
- For the Program Eligibility section, Clients cannot be coming from "Other Locations." Only DV victims or clients coming before 2012 when HEARTH was implemented may be eligible for assistance. If clients are coming from "Other Locations," please provide an explanation for each client and how they met program eligibility requirements.
- For the Financial section, the difference between the APR and LOCCS column should be \$0. The LOCCS drawn column shows the amount the agency expended while the APR column represents the agency's internal financial records.

Please feel free to reach out if you have any questions.

However, it is your responsibility to submit a complete and correct APR.

Incomplete APRs will be rejected again!

Don't be an Incomplete Zebra ©

Incomplete Zebra

A Quick Recap

What HUD looks for:

An APR Submission needs to meeting the following requirements:

- Timeliness
 - ► Timely Submission
- Bed/Unit Utilization Rate
 - National Benchmark:
 - ► TH 80%,
 - ► PH (PSH RRH) 85%
- Program Eligibility
 - ▶ Clients are eligible to receive assistance under HUD's definition of homelessness
- Financial
 - ▶ 25% match requirement met
 - ▶ LOCCS and APR column match

HOW TO REDUCE APR REJECTIONS

- Include comments on your initial submission!! The APR is a reporting tool, so use the comment fields!
- ► The only way to correct the report is to change the information the recipient entered in the Bed and Unit Inventory and Utilization or the CSV upload.
- APRs is a reporting tool only, whereas Monitoring is a compliance tool. If you have questions about client eligibility, work with your CPD Rep outside of Sage to discuss so you can ensure you are in compliance with client eligibility.
- ► HUD strongly suggests that the grantee check the original grant application to see what budget line items were funded. The APR should match the grant application.

eLOCCS Access

Approving Official Recertification

New User Application

Quarterly Draws

Recertifying of Users by Approving Officials

- Approving Officials (AO) need to recertify users as soon as the notification from eLOCCS arrives.
- ► The user and the AO need to ensure they access the system on a quarterly basis to maintain their access.
- Both users and AO need to sign onto eLOCCS <u>every three months</u> to ensure their access is maintained.
- ► Per <u>24 CFR §578.85</u> Timeliness Standards (c) *Distribution* (3) Draw down funds at least once per quarter of the program year, after eligible activities commence.
- ▶ If you lose access, please contact your CPD Representative.
- ▶ DO NOT contact LOCCS security directly. Doing so will cause delays in processing that may take time to correct.

Application Process of New Users/Coordinators

- ► FIRST Reach out to our HUD Rep for guidance.
- Please do not contact/email LOCCS security directly.
- Field Office can send you a sample HUD Form 27054e form to guide you.
- When filling out the HUD Form 27054e form, please note the following:
 - ► All users needs an M number
 - ▶ If the user does not have one, please call Reac @ 888 245 4860 Option 1.
 - Once the Financial Analyst approves the form, the form can be notarized.
 - ▶ Please make sure that both the User and Approving Official are notarized, and the dates are the same.
- ► The amount of time it takes to establish access for new users or to recertify access for current users and/or AOs depends on the accurate and timely submission of the required forms being sent to your CPD Rep via email. In other words, access approval is contingent upon timely responses from grantees.

RESOURCES

Continuum of Care

• Continuum of Care Program Regulations

SAGE

- •SAGE User Manual
- How to create an account in SAGE
- CoC APR Guidebook
- •APR Guides, Tools, and Webinars
- •Sage HMIS Reporting Repository
- •HMIS Data Standards
- oHMIS Data Standard Tool
- oHMIS Data Dictionary
- oHMIS Data Standards Manual

Financial Resources for Match

- CoC Match Overview
- Match Requirements
- Cash Match
- In-Kind Match
- Ineligible Sources

Eligibility Resources

- <u>Categories of the Homeless</u> Definition
- NOFA (Review a NOFA to confirm eligibility, just google CoC NOFA (year).

Troubleshooting

 AAQ (Submit a Question in HUD Exchange) What is the most important takeaway from this presentation?

Communicate with your CPD Rep throughout the period of performance and the reconciliation period.

Problems can be avoided if the communication lines stay open.



Q&A

Contact your CPD Rep

- Eunice Cho, <u>Eunice.Cho@hud.gov</u>
- Cynthia Blatt, Cynthia.J.Blatt@hud.gov

THANK YOU!

 This PowerPoint presentation and a resource list of all links discussed will be emailed to you.

 You will also be emailed a survey. We covered a lot of topics today and we want to learn from you what future trainings you would like to see from HUD staff.

