

HUD ENTITLEMENT SUBRECIPIENT TRAINING



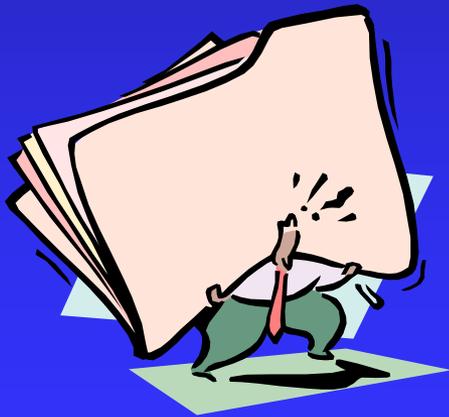
City of Binghamton
New York

Overview

- Introduction
- General
- Part 1 Financial
- Financial Q&A
- Part 2 Reporting
- Reporting Q&A



INTRODUCTION



Recipient of HUD Entitlements

- The City of Binghamton is considered an entitlement community
- The City is the recipient of HOME, CDBG, and ESG funds
- The City (me) has the responsibility to ensure HUD regulations are being followed

Sub-recipients (subs)

- Your agencies act as sub-recipients of those grants
- Subs (you) have the responsibility to ensure HUD regulations are being followed



Being Naughty



- Failure to follow proper regulations, either intentionally or unintentionally, can lead to findings or even reimbursement to HUD on the part of the City or it's subs
- Unintentional failures = not too bad and fixable
- Intentional failures = very much bad thing
- I.e. mistakes are fine, fraud is not



GENERAL

TM

Subrecipient Toolkit

- The toolkit is a page on the City website that will act as a centralized location for forms and documents you may need
- <http://www.binghamton-ny.gov/hud-subrecipient-toolkit>
 - ◆ Or go to the City of Binghamton website and type in “toolkit” in the search box

Accessibility

- Any agency receiving HUD funds must endeavor to make sure that its programs are open to every eligible person regardless of communication difficulties or disability access to the most reasonable extent
- City is working on a Language Assistance Plan for its own programs and also for other agencies in the area

Fair & Healthy Housing

- If your agency deals with placing individuals in a residential environment, make sure you understand Fair Housing rules as well as HUD requirements on safe housing (i.e. lead, asbestos, Code compliance, etc.)
- The City Fair Housing Officer is the Housing Coordinator (772-7028) and should be contacted if there are potential Fair Housing issues

Monitoring Visits

- When:
 - ◆ Late Summer/early Fall
- How long does it take:
 - ◆ ~ 30 minutes
- Where:
 - ◆ At the subrecipient's location
- Who needs to be present for the monitoring visit:
 - ◆ Usually the grant writer (or the person who is most familiar with the application), financial representative/accountant, or project head.



FINANCIALS



Request for Reimbursement

- All reimbursement requests are made up of the following:
 - ◆ 1) Claim for Payment
 - ◆ 2) Invoice
 - ◆ 3) Backup Documentation

Claim for Payment

- All reimbursement requests must have a standard City of Binghamton Claim for Payment form.
- Include the agency information at the top left (name, address only)
- This must have the total amount, not the individual line items
- This form must be dated and signed by an eligible individual or agent of your agency

Agency Invoice

- The agency invoice should list the individual line items being requested
- Make sure that you indicate what time period this reimbursement request will cover
- This can be in any form your agency wishes: letterhead, spreadsheet, etc.
- Make sure the total on the invoice equals the total on the Claim for Payment

Backup Documentation

- For every line item you request reimbursement for, make sure you have solid backup documentation.
- For salary and benefits, this can be payroll
- For purchases, provide proof of purchase
- For specific household or individual payments, provide proof that those payments have been made



Ineligible Expenses

- Acquisition, construction, or reconstruction of buildings for the general conduct of government or for general government expenses
 - ◆ Exception: removal of architectural barriers
- Political activities
 - ◆ Exception: incidental use of public facilities
- The following are prohibited unless authorized as special economic development activity or if done by CBDO
 - ◆ **Buying equipment**
 - ◆ Exception: fire department stuff and construction usage costs
 - ◆ Purchase of personal property
 - ◆ Non-service program operating and maintenance expenses
 - ◆ Construction of new housing
 - ◆ **Income payments to clients (food, clothing, housing, utilities)**

Early Closeout

- If your agency expends all contracted funds prior to the end of the contract year, you must provide a letter from your agency head indicating you have enough additional funds to continue the program at the same level through to the end of the contract period.

Payment Periods

- Preferably three or more times per year (reality)
- 8/31 – 9/1 Split
 - ◆ Please do not submit for a payment period that crosses 8/31 and 9/1
- 9/15 Cutoff
 - ◆ We may not make reimbursements during the period of 9/15 to 9/30 due to reporting requirements

Line Item Changes

- Line items are written in stone!
 - ◆ No new line items!
 - ◆ Don't cross the streams!
- If you do want to move funds between existing line items, up to 10% may be moved at the discretion of the PHCD Director (i.e. send a request letter)
- For items above 10% or for new line items, it becomes an Act of Council
 - ◆ This means a months+ delay in your payment



Final Reimbursement

- Please submit final reimbursement within 30 days of the end of the contract period
- Make sure you have submitted all reports and all everything else
- Final payments will be held up until everything has been submitted

Financial Questions and Answers

- Questions?
- ESG Contracts



REPORTING

Client Intake

- Please have a standard client intake form that includes information you will need to report to the City
 - ◆ Residential Status
 - ◆ Income eligibility
 - ◆ Race/Ethnicity
- The City has a standard generic Client Intake Form you may use or incorporate into your own intake forms

Residential Eligibility

- Ultimately, you will only be reporting verified City of Binghamton residents
- Verification methods
 - ◆ Address
 - ◆ School District
 - ◆ Voting District (bestest other than GIS)
- Use a reasonable method

Income Eligibility

- Clients are Income Eligible by two methods
 - ◆ 1) Actual household income
 - ◆ 2) Presumed Category
- Clients are never eligible based on area UNLESS your program is an area specific program

Income Guidelines

Household Size	1	2	3	4	5	6	7	8
<i>HUD Low Income 2015</i> (80% of Broome County Median Income)	\$36,600	\$41,800	\$47,050	\$52,250	\$56,450	\$60,650	\$64,800	\$69,000
<i>HUD Very Low Income 2015</i> (50% of Broome County Median Income)	\$22,900	\$26,150	\$29,400	\$32,650	\$35,300	\$37,900	\$40,500	\$43,100
<i>HUD Extremely Low Income 2015</i> (30% of Broome County Median Income)	\$13,750	\$15,930	\$20,090	\$24,250	\$28,410	\$32,570	\$36,730	\$40,890

If more than 8 people in household, contact the Grants Administrator prior to contacting a reality show producer

Proof of Income

- Bestest
 - ◆ W-2s
 - ◆ Tax Returns
 - ◆ Social Security Statement
- Others (Not as good but workable)
 - ◆ Food Stamps
 - ◆ Social Services
 - ◆ Signed statement (problematic)

Presumed Low/Mod Clients

- Abused children
- Homeless
- Battered spouses
- Persons with AIDS
- Senior Citizens (Aged 62 and older)
- Illiterate adults
- Severely disabled adults
- Migrant farm workers
- Note: These all require some kind of proof the client meets this criteria

Race and Ethnicity

- Not the same
- Race:
 - ◆ White
 - ◆ Black
 - ◆ Asian
 - ◆ American Indian/Alaska Native
 - ◆ Pacific Islander
- Ethnicity:
 - ◆ Only one of concern for reporting is Hispanic/Latino

Reporting Forms

- Client Reporting Form

- ◆ Details new clients based on race, ethnicity, and income

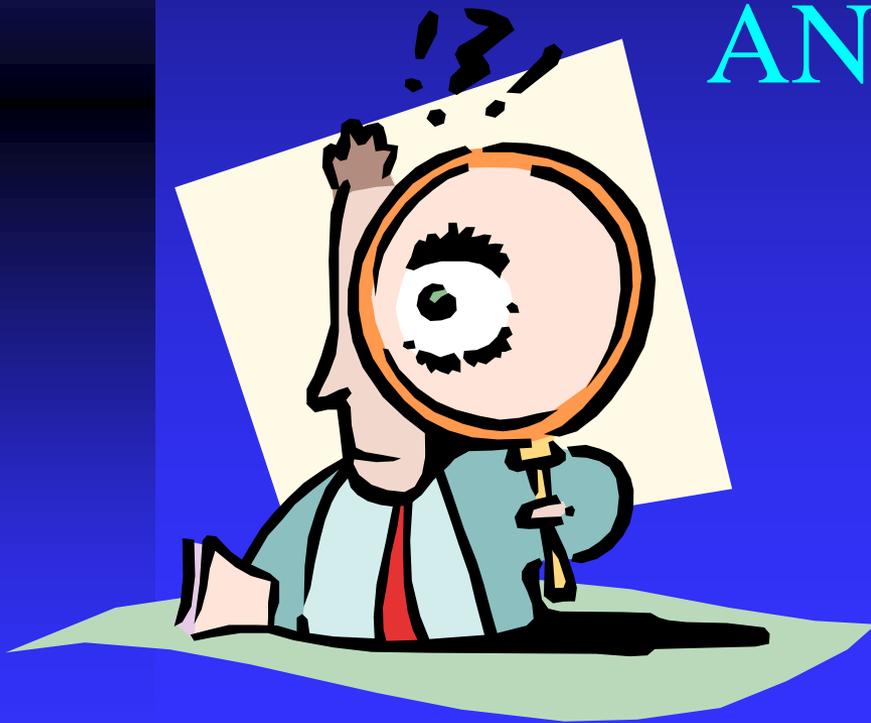
- Program Reporting Form

- ◆ Narrative that goes into broader details for your program
- ◆ Numbers should match the client reporting form

Reporting Periods

- Preferably three or more times per year (reality)
- Submit reports with payment requests
- 8/31 – 9/1 Split
- Final Reports must be marked as Final and must be provided prior to final payment

FINAL QUESTIONS AND ANSWERS



Questions?
Contracts

THANK YOU



City of Binghamton
New York