2024 Emergency Solutions Grants Implementation Webinar Part I

November 6, 2024

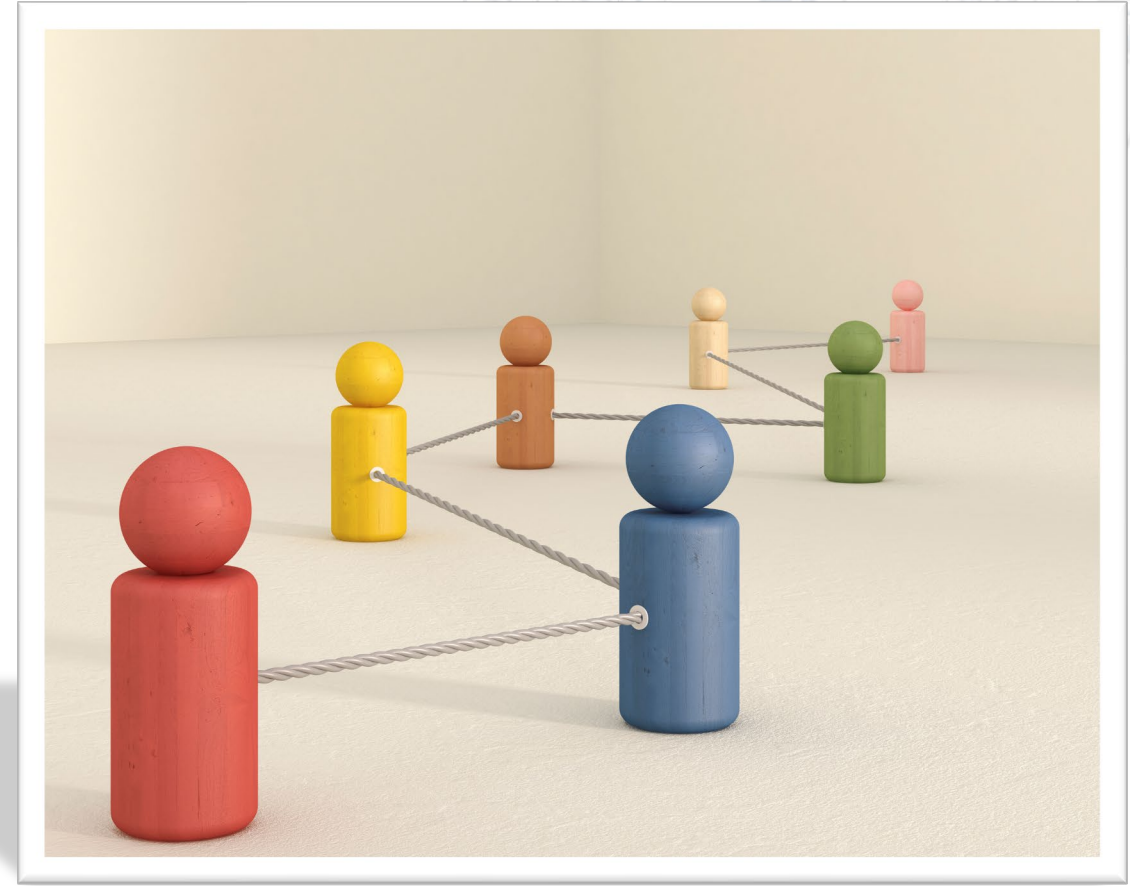# Introduction and Housekeeping

Presenters

Rosy Falcon

Homeless Programs Manager

Tahmoor Chadury

Homeless Programs Specialist

General Inbox

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Webinar Objectives

Departmental Overview

- TDHCA Programs and Divisions

- Resources for Households

- Funding Distribution

- ESG Components

Federal and State Requirements

- Code of Federal Regulations (CFR)

- Texas Administrative Code (TAC)

- Administrative Processes

- Housing Contract System (HCS) and the Monthly Expenditure Report (MER)

TDHCA Overview

TDHCA Programs

Poverty & Homelessness Prevention

Single Family and Homeless Programs Division: Emergency Solutions Grants Program, Homeless Housing and Services Program, Ending Homelessness Fund

Rental Assistance

Rental Housing Development

Home Affordability: Energy Efficiency

Single Family Homeownership & Homebuyer Assistance

Home Repair

RESOURCES
Help for Texans

- Individuals and organizations can search for various types of housing assistance at

  https://www.tdhca.texas.gov/help-for-texans

- ESG funded organizations are under *Emergency and Homeless Services.*

Overview of Divisions

Single Family and Homeless Programs Division

- Director of Single Family and Homeless Programs
  - Abigail Versyp
- Homeless Programs Manager
  - Rosy Falcon
- Homeless Programs Specialist
  - Tahmoor Chadury

Compliance Division

- Director of Subrecipient Monitoring
  - Earnest Hunt
- Manager of Physical Inspections
  - Manuel Peña
- Additional Compliance Staff
  - https://www.tdhca.texas.gov/compliance-division-staff

Division of Duties

Single Family and Homeless Programs Division	Compliance Division
Develops Notices of Funding Availability, program guidance, rules and contracts	Ensures funds are expended according to Contract and regulations
Reviews Applications	Conducts desk and/or on-site visits
Answers program and technical assistance questions	Answers compliance questions
Receives and ensures timely submission of reports, payments, and Contracts	Provides income eligibility training
Responds to questions concerning budgeting, reports, and amendments	Single Audit compliance
Reviews monthly expenditure and performance reports	

ESG Allocations and Eligible Components

Emergency Solutions Grants (ESG)

2024 allocation of $9.29 million

Street Outreach	Emergency Shelter
Rapid Re-Housing	Homeless Prevention
HMIS	Administration

CoC #	CoC Name	2024 Allocation Amount
TX-500	San Antonio/Bexar County	$764,078
TX-503	Austin/Travis County	$551,072
TX-600	Dallas City & County/Irving	$1,146,424
TX-601	Fort Worth/Arlington/Tarrant County	$712,583
TX-603	El Paso City & County	$331,606
TX-604	Waco/McLennan County	$120,798
TX-607	Texas Balance of State	$3,768,851
TX-611	Amarillo	$153,019
TX-624	Wichita Falls/Wise, Palo Pinto, Wichita, Archer Counties	$117, 401
TX-700	Houston, Pasadena, Conroe/Harris, Fort Bend, Montgomery Counties	$1,444,002
TX-701	Bryan/College Station/Brazos Valley	$175,858

Federal and State Requirements

ESG Administrative and Financial Requirements

Code of Federal Regulations

- 2 CFR §200
  - Uniform Administrative Requirements
  - Cost Principles
  - Audit Requirements
- 24 CFR §576.108 Administrative Activities
  - (a)(1)(i) Support for Salaries and Wages
- 24 CFR §576.109 Indirect Costs
- 24 CFR §576.405 Homeless Participation

Texas Grant Management Standards (TXGMS)

- Applicable to Units of Local Government only

Texas Administrative Code

- 10 TAC Chapter 1, Administration
- 10 TAC Chapter 2, Enforcement
- 10 TAC Chapter 7, Homelessness Programs
  - Subchapter A, General Policies and Procedures
  - Subchapter C, Emergency Solutions Grants

Additional Requirements

- ESG Contract
- Fair Housing
- Equal Access to Housing Final Rule

ESG Program Guidance for TDHCA Subrecipients page:

https://www.tdhca.texas.gov/emergency-solutions-grants-esg-program-guidance-tdhca-subrecipients

Single Audit Compliance

		Federal	State
Single Audit (SA)	Expenditure Threshold:	$750,000 or more in Federal Funds for a FY that began before October 1, 2024 **OR** $1,000,000 or more in Federal Funds for a FY that began on or after October 1, 2024	$750,000 or more in State Funds for a FY that began before October 1, 2024 $1,000,000 or more in State Funds for a FY that began on or after October 1, 2024
	Deadline:	9 months after FY End or within 30 days from the entity receiving the report	
	Submission:	• Submit SA to Federal Audit Clearinghouse (FAC) • Forward notice of submission acceptance email from FAC to SAandACF@tdhca.state.tx.us	• Submit SA to SAandACF@tdhca.state.tx.us
Audit Certification Form (ACF)	Description	A TDHCA form used to report the Federal and/or State grant expenditures claimed during the reporting FYE	
	Deadline:	Submit ACF within 2 months after FY End to SAandACF@tdhca.state.tx.us	

SA and ACF here: https://www.tdhca.state.tx.us/pmcomp/forms.htm

Identifying Allowable Costs

Factors Affecting Allowability of Costs (§200.403)

a) Reasonable and necessary
b) Conforming to limitations or exclusions
c) Consistent with policies and procedures
d) Accorded consistent treatment
e) Determined in accordance with GAAP
f) Not included as cost-sharing
g) Adequately documented

Types of Costs

- Direct Costs
  - Directly performing activities related to ESG objectives
    - Ex. Salary paid to a case manager
- Indirect Costs
  - Serving "common" or joint objectives of the organization as a whole.
    - Ex. Rent, Utilities, Administrative functions

Allocating Allowable Costs

Cost Allocation

- Charging an expenditure, in part or as a whole, to a particular project;
- All expenditures must be fully allocated to one or more cost centers;
- Expenditures for the same purpose must be treated consistently; and
- Allocation guidelines apply to all expenditures, not only to ESG

Cost Allocation Plan

A written plan that documents how an organization will allocate costs between two or more programs. It will detail the methodology used for each type of expense category.

Allocation Methods

- Indirect Cost Rates
  - Federally Approved IDC
  - 10% DeMinimis Rate or 15% for awards entered into after Oct. 1, 2024
- Direct Allocation
  - Cost Allocation Plan for shared direct costs.

Procurement Standards

Procurement Regulations

- State Purchase and Procurement Standards at 10 TAC §1.404

- Procurement Standards at 2 CFR §200.318 - §200.327

- TXGMS - Units of local government

Basics of Procurement Procedures

- Subrecipients must maintain and use strong procurement procedures

- Subrecipients must ensure that all procurement transactions are competitive and include specifications that do not restrict any competition.

- For all procurements, a cost or price analysis should be conducted.

- Documentation of procurement processes sufficient to demonstrate adherence to regulations.

Procurement Methods

- Informal Procurement
  - Micro-purchases
    - $3,000 threshold under TXGMS
    - $10,000 threshold
  - Simplified Acquisitions
    - $250,000 threshold

- Formal procurement
  - Sealed Bids
  - Proposals
- Noncompetitive procurement
  - Rarely used

Citation: 2 CFR §200.320

Procurement Webinar:

https://www.tdhca.texas.gov/sites/default/files/SFHP-division/esgp/docs/ESG-ProcurementGuide.pdf

Match Requirements and Reporting

24 CFR §576.201

- Minimum match requirement is 100%, unless an organization elected to provide 110% match

- Activities must be allowable under ESG and recordkeeping requirements are applicable

- Match should be reported when incurred

Match Reporting

- Match is reported in the Monthly Expenditure Report (MER)
  - Reported per component and/or activity
  - Support documentation
- What if I have unreported match?

Match Sources

- Federal sources
  - Ex. CSBG Funds
- State sources
- Private Donations
- Noncash sources
  - Volunteers
  - Donated goods
- Value of Buildings
- Program Income

Match Documentation

- At a minimum, documentation should generally include:

  - Source/Type of funds

  - Value

  - Activity/Description

- Example

  - Timesheets if using volunteer donated time

  Match Webinar:

  https://www.tdhca.texas.gov/sites/default/files/SFHP-division/esgp/docs/ESG-Match-Guidance.pdf

Volunteer Time Sheet

Name : _____   Month : _____

	Day/Date	Department	Job Assignment	Time IN	Time OUT	Total Hours per Job
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						

Total Hours

Administrative Processes

Contract Amendments

[10 TAC §7.4(e)](#)

- **Fund Transfers**: Funds cannot be transferred between components, such as from Rapid Re-Housing (RRH) to Homelessness Prevention (HP).

- **Allowable Transfers**: Transfers between HMIS/administrative and program components are allowed, provided that the respective caps of 12% for HMIS and 3% for administrative costs are not exceeded.

- [Budget Amendment Form](#)

- **Contract Extensions**: Contracts may be extended for up to 6 months beyond the original expiration date by the Program Director.

- **Amendment Requests**: Requests for amendments must be submitted at least 30 days before the contract's end date.

Direct Deposit and the Texas Identification Number Form (TIN)

- Due upon application submission.

- Any updates must be sent to Homeless Programs staff ASAP to avoid reimbursement delays.

- https://www.tdhca.texas.gov/emergency-solutions-grants-esg-program-administrative-and-reporting-support-tdhca-subrecipients

Housing Contract System Access Form

- Housing Contract System (HCS) Access
  - One Contract Contact,
  - One Executor, and
  - Any other staff given access to HCS for reporting purposes

- If Executor/Contact changes, an updated HCS Access Form signed by the executor is needed
  - https://www.tdhca.texas.gov/sites/default/files/SFHP-division/hhsp/docs/HCS-Request-Form.doc

Housing Contract System and Reporting

Housing Contract System (HCS)

- Contract Level
  - Important documents for contracts (Contract, Amendments, Written Standards, HCS Access Request Form, Direct Deposit Authorization, etc.)

- Activity Level
  - Monthly reporting

TDHCA Housing Contract System

Please log in to continue.

User ID: [ ]
Password: [ ]

Login

You are accessing a Texas Department of Housing and Community Affairs information system. Unauthorized use is prohibited, and usage may be subject to security testing and monitoring. Misuse of this system is subject to criminal prosecution. Users of this system should have no expectation of privacy except as otherwise provided by applicable privacy laws.

Access HCS here: https://contract.tdhca.state.tx.us/

Monthly Reporting

- Subrecipients must submit a Monthly Performance Report (MPR) and a Monthly Expenditure Report (MER)
  - Submitted every month through HCS
  - Reports are due no later than the last day of each month, combined draws are not allowed without prior approval.
  - Should reflect performance and expenditures conducted in the prior month, including those that used matching funds.

The Monthly Expenditure Report (MER)

- Monthly Performance Report (MPR) must be submitted prior to being able to submit the MER.

- Any expenditure reported in MER must have corresponding performance in MPR.

- Match is reported in three sections of the MER
  - Included in Total Monthly Expenditures
  - Non-Program Fund Credit
  - Non-Program Table

- Monthly Reporting Guide available at https://www.tdhca.texas.gov/sites/default/files/SFHP-division/esgp/docs/ESG-MPR-Guide.pdf

DRAWS FOR PROJECT

Item #	Category	Budgeted Amount	Drawn To Date	Available Balance	Total Monthly Expenditures	Non-Program Fund Credit	This Draw Amount
1	Administration	$5,000.00	$2,000.00	$3,000.00	$0.00	$0.00	$0.00
2	Data Collection (HMIS)	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
…							
Total		$100,000.00	$95,000.00	$5,000.00	$0.00	$0.00	$0.00

NON PROGRAM

Type	Amount
Other Non-ESG HUD Funds	
Other Federal Funds	
State Government	
Local Government	
Private Funds	
Other	
Fees	
Program Income	
Total	$0.00

Approver Role	Approver Name

Save   Submit for Approval without Saving

Getting started in HMIS

- Subrecipients must enter ESG participants' data into HMIS or a comparable database if a DV provider.
  - Project set up requirements are in the ESG HMIS manual
  - Questions on HMIS should be directed to your HMIS Lead

| CoC #	CoC Name	HMIS Lead
TX-500	San Antonio/Bexar County	Haven for Hope of Bexar County HMIS.Support@havenforhope.org
TX-503	Austin/Travis County	ECHO HMIS.Team@AustinECHO.org
TX-600	Dallas City & County/Irving	Housing Forward info@housingforwardntx.org
TX-601	Fort Worth/Arlington/Tarrant County	A Home with Hope HMISTeam@ahomewithhope.org
TX-603	El Paso City & County	El Paso Coalition for the Homeless Dherald.epch@elp.twcbc.com
TX-604	Waco/McLennan County	Prosper Waco hmis@prosperwaco.org
TX-607	Texas Balance of State	Texas Homeless Network hmis@thn.org
TX-611	Amarillo	City of Amarillo COCTX611@amarillo.gov
TX-624	Wichita Falls/Wise, Palo Pinto, Wichita, Archer Counties	Nortex Regional Planning Commission dmorgan@nortexrpc.org
TX-700	Houston, Pasadena, Conroe/Harris, Fort Bend, Montgomery Counties	Coalition for the Homeless of Houston HMIS@cfthhhouston.org
TX-701	Bryan/College Station/Brazos Valley	Twin City Mission stanleyd@twincitymission.org

Annual Reporting in SAGE

- ESG Subrecipients will submit information yearly as required for the Consolidated Annual Performance and Evaluation Report (CAPER), including, but not limited to:
  - SAGE Reporting (HMIS exports as required by HUD)
  - SAGE Reporting required annually for ESG Annual Contracts
- TDHCA will be reaching out the first week of September with details and when to expect upload links from SAGE.
- Contact HMIS Lead on uploading project bundles.

Additional Resources

HUD and Department Reporting Resources

- HMIS Data Standards (HUD)
- ESG Program HMIS Manual (HUD)
- ESG Monthly Reporting Guide
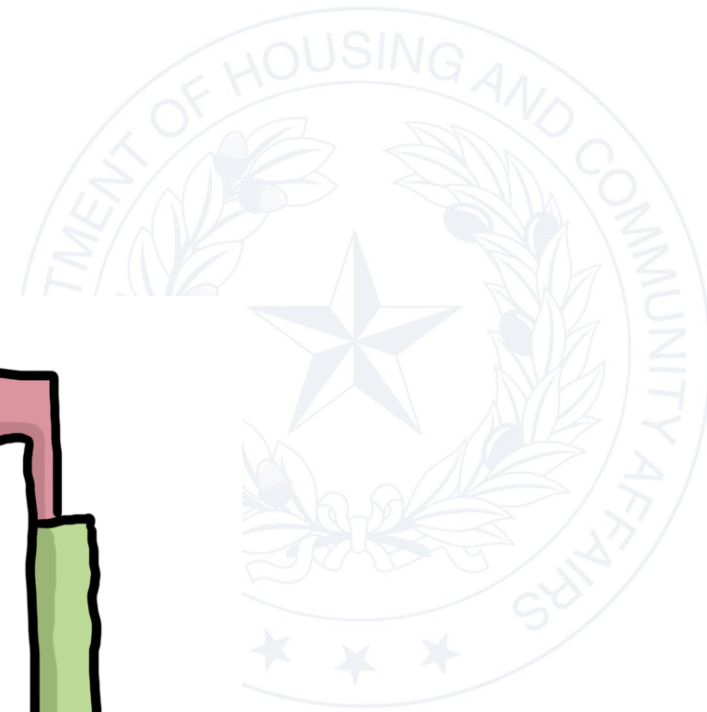
Looking Forward to Tomorrow's Webinar

- November 7th, 2024 @ 10 A.M. CDT

- Register: https://attendee.gotowebinar.com/register/5931421470982881628

- Objectives:
    - Outlining Federal and State Programmatic Requirements
    - Determining Client and Unit Eligibility
    - Examining the Housing Contract System and the Monthly Performance Report (MPR)
    - Understanding the Closeout Process

Thank you for all the work you do in your communities!

Additional Questions?

EMAIL US AT:
HOMELESSPROGRAMS@TDHCA.TEXAS.GOV