24 CFR PART 84

• Governs the implementation of federal grants and agreements

• Applicable to institutions of higher education

• Also applicable to sub-recipients and sub-grant awards
• Notice of Funding Availability
• Grant Agreement (Terms and Conditions)
• Regulations (24 CFR part 84)
• OMB Circulars A-21 and A-133
• Standards for grantee’s financial management systems are explained at 24 CFR 84.21

• Records must identify the source and application of funds

• Costs must be allowable, allocable, and reasonable (OMB Circular A-21)
Internal controls must be established to safeguard funds and assets.

Minimize the time between the drawdown and expenditure of grant funds (3-day rule).

Records must be sufficient for annual audits pursuant to OMB Circular A-133.
• All costs incurred by the grantee must be in conformance with the approved budget.

• Transfers of funds must be approved by HUD if the cumulative amount exceeds 10% of the effected budget line item.

• Excess costs shall be borne by the grantee.
• Can only be considered for “circumstances beyond the grantee’s control”

• Requests must be submitted to HUD at least 60 days prior to the end of the grant term

• If approved, HUD will issue an amended grant agreement

No Cost Extensions
• Real property requirements are found at §84.32

• Equipment acquired with grant funds is subject to §84.34

• Supplies and other expendable property is subject to §84.35
• Equipment records and a physical inventory of equipment shall be incorporated into the grantee’s property management standards

• The sale or transfer of property or equipment must comply with federal disposition requirements if their residual value is $5,000 or more
• Grantees must maintain written standards of conduct governing employees involved in contract award and administration.

• Procurement actions must provide for open and free competition.

• A grantee’s procurement procedures must comply with §84.44.
• Small purchase procedures (contracts of $100,000 or less)

• Request for proposals (service contracts where price is one of several factors)

• Invitation for bids (construction contracts to be awarded to the lowest responsible bidder)
FOR EVERY PROCUREMENT ACTION:

- Conduct a cost or price analysis (§84.45)
- Maintain procurement records (§84.46)
- Follow written procedures for contract administration (§84.47)
- Include contract provisions (§84.48)
SECTION 3

- Economic opportunities (employment, training, or contracting) shall be directed to low-income persons in the community
- Applies to construction/rehabilitation projects
- 24 CFR part 135, subparts B and E
PROGRESS REPORTS

- Summarized in the Terms and Conditions to the Grant Agreement
- Due 30 calendar days after the end of each quarter (semi-annual for HSIAC)
- Reflect activities undertaken during the reporting period
NARRATIVE

- Describe accomplishments, progress made toward achieving goals and objectives; significant problems, and planned corrective actions

- Report on progress made in obtaining leveraged funds outlined in the proposal

- Provide status of all tasks outlined in the approved Project Management Plan

- Grant Progress Report (form HUD-40077) may be used in lieu of narrative
FINANCIAL

• Reflect costs incurred during the reporting period and cumulatively

• Report costs by budget line item as reflected on the Detailed Budget, form HUD-424-CB

• Include form SF-425, Financial Status Report
eLOGIC MODEL

- Submitted once annually with the quarterly report ending **June 30** (earlier grant years submit eLogic Model quarterly)

- Show results that occurred during the entire year and cumulatively

- Activities, outputs, outcomes, and measures must accurately reflect project objectives before form is unlocked for reporting

**Reporting Requirements**
FINAL REPORT

- Submit within 90 calendar days from the end of the grant term
- Report on the entire grant performance period
- Include a final progress report, Federal Financial Report (SF-425), and eLogic Model
- Also include a Closeout Certification and Property Statement

Reporting Requirements
Section 110(a) of the Housing and Community Development Act of 1974 requires that prevailing wages under the Davis-Bacon Act be paid to construction workers when a contract exceeds $2,000 or, in the case of housing rehabilitation, 8 or more units.

Wage determinations can be obtained online at www.wdol.gov.
• Volunteer labor is exempt from prevailing wage requirements per 24 CFR part 70

• The Contract Work Hours and Safety Standards Act requires overtime provisions for construction workers when contract exceeds $100,000

• Additional information available from HUD’s Office of Labor Relations field office staff (see www.HUD.gov for listing)
• OUP Website:  www.OUP.org
• Sherone Ivey: (202) 402-4200
• Susan Brunson: (202) 402-3852
• Bob Kroll: (213) 534-2601
• Madlyn Wohlman-Rodriguez: (202) 402-5939
• Ophelia Wilson: (202) 402-4390
• Kinnard Wright: (202) 402-7495
Please contact your assigned OUP staff member with any questions regarding grant implementation requirements.