COSCDA held its 2020 Program Managers Training Conference on February 24-25, 2020 in Washington, DC. Copies of the presentation PowerPoints and handouts can be found on the COSCDA website. This document highlights some of the key points made at each of the sessions. Additionally, there was supplemental training provided following the conference on Disaster Recovery and Homelessness programs, as well as a special roundtable for executive level directors or officials from COSCDA member agencies.

### Plenary Sessions

**Welcome and Washington Update**

Speaker:
John G. Bravacos, General Deputy Assistant Secretary, Community Planning and Development, HUD

Mr. Bravacos provided a wide-ranging presentation on several of HUD’s activities and priorities. A few highlights of those comments included:

- **HUD Administrative Timelines:** With only a few months remaining prior to the next presidential election, the administration is working diligently to accomplish as much as possible in the time remaining.
• Affordable Housing Regulatory Burden: HUD has received and appreciates COSCDA’s written comments related to regulatory barriers to affordable housing. He encouraged members to continue to submit comments as HUD continues to address the regulatory burdens.

• Section 3: The Section 3 Final Rule is targeted to be completed by Memorial Day but could slip into the summer. It is anticipated that the new rule will be more favorable to the entitlement communities and less favorable to the states. The rule will include the provision to require employment to be calculated by hours worked rather than individual employment calculations. He encouraged COSCDA members to submit comments and feedback regarding the revised rule.

• Regional and Field Offices: Mr. Bravacos recognized and acknowledged concerns about consistency and effective communication between HUD and the Regional/Field Office staff. HUD is working to address these concerns over the months remaining.

COSCDA Federal Update
Speaker:
Josh Shumaker, Director of Advocacy & Federal Programs, COSCDA

• The FY2020 appropriations bill for HUD was signed into law on December 20, with increases to CDBG, HOME, and Homeless Assistance programs:
  ✔ CDBG received $3.425 billion (+$125m over FY19)
  ✔ HOME was approved for $1.35 billion (+$100m over FY19)
  ✔ Homeless Assistance Grants received $2.777 billion (+$141m over FY19)

• Active legislation that COSCDA is following:
  ✔ Two bills would direct CDBG grantees to report on local and state actions supporting affordable housing: Yes In My Back Yard Act (YIMBY) and Housing Opportunity, Mobility, and Equity Act (HOME).
  ✔ Housing is Infrastructure Act proposes $100 billion in new spending for housing programs, including CDBG, HOME, and HTF.
  ✔ Disaster reform legislation would permanently authorize the CDBG-Disaster Recovery program and implement timelines to expedite processes; House approved the legislation in November and the Senate companion bill awaits consideration by committee.

• HUD Regulatory and Programmatic Actions that COSCDA is engaged:
  ✔ Environmental review reforms are being considered; latest NEPA proposed update may provide opportunity for regulatory actions aligned with state needs.
✓ Awaiting final response and guidance on using CDBG in Opportunity Zones, Section 3, and CDBG recovery housing assistance.

- COSCDA has undertaken targeted initiatives dedicated to proposing reforms to CDBG and HOME as well as examining the state role in addressing affordable housing need and reducing homelessness.

- COSCDA is also encouraging members to participate in National Community Development Week, April 13 – 17.

**National Perspectives on Community Development, Housing, and Homelessness Issues**

Speakers:
Mike Koprowski, National Campaign Director, National Low Income Housing Coalition
Joseph Kane, Associate Fellow, The Brookings Institution
James S. McCleskey, Director, North Carolina Washington Office

The following points provide the highlights for each speaker:

- **Mike Koprowski**: National survey data gathered by region conducted by “Opportunity Starts at Home” (initiative of National Low Income Housing Coalition) found the lack of affordable housing is a top concern for most Americans regardless of party affiliation. Stable affordable housing is viewed by the overwhelming majority of the public as fundamental. Roughly 9 in 10 believe it is very important or one of the most important things regarding its effect on people’s security and well-being, as well as their ability to achieve a secure middle class life.
• Joseph Kane: America’s infrastructure system, whether roads and bridges or sanitary sewer systems, is aging and challenged to keep up with demand and growth. Compounding this are the natural disasters that are happening more frequently. As we look to improving our infrastructure system, we need to look at building resiliently and not in disaster prone areas.

• James S. McCleskey: Flooding and natural disasters are an increasing concern impacting states across the United States. Work in Washington, DC should be focused on addressing these increasing disasters and focusing on building communities that are resilient.

2020 Political Outlook
Speaker:
Kyle Kondik, Managing Editor, Sabato’s Crystal Ball, University of Virginia Center for Politics

Mr. Kondik provided his political perspective on the coming year. Some key points he made were:

• Pollsters are in for an exciting year as President Trump energizes his base and the Democrats work to rally around a presidential candidate.

• Contrary to popular belief, the polls were not entirely off in the 2016 presidential election. Rather, the interpretation of the polls lacked the analysis needed.

Cross-Cutting and Joint Sessions

Grant Management Systems for States
Speakers:
Mark Williams, Compliance Branch Manager, Kentucky Department for Local Government
Janice Waddell, COSCDA Board Member and Section Chief, Grants Management, California Department of Housing and Community Development
Cheryl Brown, CDBG Program Manager, Utah Department of Workforce Services, Housing and Community Development Division
Donna Enrico, Chief, Community Development Operations, Pennsylvania Department of Community & Economic Development

Four states presented their experience with using grants management systems, including pros and cons. The major takeaways included:

• Kentucky’s GMS, using Housing and Development Software, can sync and log into IDIS. Their system has been in operation since 2001.
California has recently launched their new GMS procuring software from eCivis Grants Network. Originally they had a custom built GMS that did not allow for interaction externally, so the state procured a new system to be able to allow interaction internally and externally.

- Due to procurement concerns, the state reviewed the Sandy Hook OIG report because of procurement issues with vendors.

Pennsylvania developed their GMS internally in the 1990s and is now used by 6 state agencies to accept on-line applications. The GMS accepts applications, generates contracts and tracks major areas of compliance and grants management. They also implemented a “risk analysis” as a result of 2 CFR Part 200. Their program is now all electronic.

Utah developed its GMS in 2007, using WebGrants, to address a desire for on-line application capability. The ability for attachments was important as well as the need to track multiple programs in the department. Enhancements through the years included adding all CDBG/HUD activities.

None of the systems that can interact with IDIS are able to interface with DRGR.

While all systems have some limitations, all presenters felt the electronic processes were positively affecting their efficiencies and the ability to generate reports.

Complying with Uniform Administrative Regulation (2 CFR 200)

Speakers:
Robert Peterson, Senior Community Planning and Development, Office of Block Grant Assistance, HUD
Kathy Possinger, COSCDA Board Member and Director, Pennsylvania Department of Community and Economic Development
Laura Sullivan, Assistant Chief, State of Rhode Island, Office of Housing and Community Development

- Robert Peterson clarified that the State CDBG program is subject to only PORTIONS of 2 CFR Part 200, Uniform Administrative Requirements (UAR), Cost Principles, And Audit Requirements for Federal Awards, as further specified by program regulations in 24 CFR Part 570:
  - Subpart A, Acronyms and Definitions (2 CFR 200.0 through 200.99): Applicable;
  - Subpart B, General Provisions (2 CFR 200.100 through 200.113): Applicable;
  - Subpart C, Pre-Federal Award Requirements and Contents of Federal Awards (2 CFR 200.200 through 200.213) Not applicable, except for 2 CFR 200.207, which is made to apply through 24 CFR 570.485(d);
  - Subpart D, Post Federal Award Requirements (2 CFR 200.300 through 200.345): Partially Applicable.
  - Subpart E, Cost Principles (2 CFR 200.400 through 475): Applicable with modifications.
✓ **Subpart F**, Audit Requirements (2 CFR 200.500 through 512): **Applicable.**

- Mr. Peterson also reminded the audience that the above information is included in more detail in the Chapter 4 Introduction of the CPD Monitoring Handbook (6509.2) for the State CDBG Program, and clarified that the HUD monitoring exhibits used by HUD would be guided by what parts of the UAR were adopted by a state.

- Laura Sullivan of Rhode Island cross-walked Rhode Island’s state procurement and financial management procedures with 2 CFR 200, including where a state may be more restrictive than the federal guidelines, or must follow the UAR, if adopted. She also reviewed methods of procurement, contract provisions that should not be overlooked by states when updating their grant contracts/agreements and policy manuals, and other implications of adopting those portions of the UAR that are optional for states. She shared some online portals and best practices including the online bidding system from eprocurement.cityofnewport.com, key differences between single and sole source procurement, and selection factors of professional services.

- Kathy Possinger of Pennsylvania reviewed her state’s risk analysis and subrecipient monitoring procedures, and brought attention back to the HUD Integrity Bulletins released in 2016, particularly the one entitled “Subrecipient Oversight and Monitoring – A Roadmap for Improved Results: [https://files.hudexchange.info/resources/documents/HUD-Integrity-Bulletin-Subrecipient-Oversight-Monitoring.pdf](https://files.hudexchange.info/resources/documents/HUD-Integrity-Bulletin-Subrecipient-Oversight-Monitoring.pdf). She explained Pennsylvania’s methods of categorizing a grantee as High-, Medium-, or Low-Risk, and how this affects their monitoring schedule. Some of their risk analysis factors include: grantee capacity, timeliness, type of activity funding, compliance and reporting, and the unexpended ratio of other federal funds in the project. It was noted by several states that they conduct 100% on-site monitoring, but we were all reminded of the new rules under 2 CFR 200.331(b) that require grantees access their subrecipients’ capacity to be successful, through an annual risk assessment on each subrecipient.

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**Housing Counseling – Effective Implementation beyond New Rule**

Speakers:
Jerrold H. Mayer, Director, Office of Capacity Building, HUD
Shawna LaRue Moraille, Principal, ICF
Russell Graves, Executive Director, Consumer Credit and Budget Counseling, Inc.
Patrick Noonan, Program Manager, Brothers Redevelopment, Inc. Department of Housing and Community Development
• All HOME funded homebuyer activities require counseling and it must be provided by a HUD approved counselor working for a HUD approved counseling agency. Counseling is also part of the new HOME monitoring checklist.

• If you have not already planned to implement a counseling program, partnering with an existing approved counseling agency is the way to go. HUD Exchange has a section dedicated to housing counseling, including a listing of all the approved counseling agencies.

• Case management under ESG/COC/HOPWA is not considered housing counseling by HUD and is not subject to the housing counseling requirements.

Environmental Review: Critical Issues, Proposed Changes, & HEROS Update
Speakers:
Lauren McNamara, Environmental Review Division Director, Office of Environment and Energy, HUD
Lauren Hayes Knutson, Environmental Specialist, Office of Environment and Energy, HUD

• HUD is in the process of revising Part 50 and Part 58 at this time. After Council on Environmental Quality publishes its final rule, HUD will probably have to revise the procedures again.

• There is no timeline for putting States on HEROS. The capability for States to approve ERRs in the system does not exist at this time and there is no funding to make it possible.

• HUD is working to develop more consistency amongst regions regarding environmental monitoring and determinations.

Community Development Sessions

Using CDBG for Broadband and Opportunity Zone Update
Speakers:
Geoffrey Armes, Community Planning and Development Specialist, Office of Block Grant Assistance, Community Planning and Development, HUD
James E. Höemann, Director, Entitlement Communities Division, Office of Block Grant Assistance, Community Planning and Development, HUD
Tamara Holmes, Director, Office of Broadband, Virginia Department of Housing and Community Development
Leslie Leager, Division Coordinator, Iowa Economic Development Authority

The most significant takeaways from the Broadband/OZ session included:
• HUD will issue a Notice regarding Broadband sometime this year should be focusing on how a project does and does not meet a national objective.

• Broadband and resiliency need to be a part of Consolidated Plan.

• FCC data on form 477 is not quite accurate on served data vs covered area.

• Efforts to expand broadband are focusing on digital literacy and how it helps “level the playing field.”

• Broadband planning is critical to successful deployment of infrastructure.

• Using CDBG funds for broadband works best when using the national objective of economic development with job creation.

• Opportunity Zones (OZs) state portals linking projects/zones with investors is a useful tool.

• CDBG bonus points for projects in OZ may help spur investment.

NSP and CDBG Grant Closeouts
Speakers:
Njeri Santana-Carter, Community Planning and Development Specialist, Office of Block Grant Assistance, HUD
Andrala Walker, Community Planning and Development Specialist, Office of Block Grant Assistance, HUD
Ray Robinson, Jr., Manager, Compliance Bureau, Community Services Division, Mississippi Development Authority
Traci Watts, COSCDA Board Member and Director, Louisiana Office of Community Development

• HUD is very motivated to closeout older grants due to legislative pressure. They acknowledge past errors/miscommunications and are hoping to use expedited processes when possible, especially for CDBG closeout where states believe the grants already closed.

• However, HUD also acknowledges that data issues are a barrier to closeout for NSP, both entering the data in the system and having the data available at all. Resources for resolving these issues are limited – contact Njeri Santana-Carter at HUD or use a TA provider.
States that have been most successful have been proactive in collecting and recording data. Closeout WILL require dedicating resources to the data cleanup.

States that still have an NSP balance have a few options but no magic bullet. Transferring Program Income to CDBG, changing target areas, completing the land bank cycle, etc. should be explored.

**Community Development Block Grant Modernization/Reforms**

Speakers:
Joanie Perry-Ward, COSCDA Board Member and Director, Community Finance Division, Georgia Department of Community Affairs
Josh Shumaker, Director of Advocacy & Federal Programs, COSCDA

Areas of discussion included the following topics:

- **CDBG Modernization/Reform Priorities**
  - The genesis for this discussion is the potential for reauthorization.
  - CD committee discussions initiated last summer in response to consistent challenges with the program; underinvestment, administrative burdens, and calls for elimination and claims of ineffectiveness.
  - Overview presented at Annual conference and a volunteer working group was formed. This group presented their recommendations in a draft proposal.
  - The COSCDA board reviewed these on Sunday, February 23rd.
  - These were discussed and ideas/recommendations/follow-ups resulted.
  - While no formal action was approved, the idea is to have our positions in writing if and when reauthorization is introduced.
  - The group discussion was engaging and a couple of areas of follow-up include citizen participation advertising requirements and tweaks to the modernization priorities.

- **CDBG Appropriations**
  - CDBG was approved for $3.425 billion in FY20
  - A pilot program for Housing Recovery Assistance under the SUPPORT Act was funded at $25 million.

- **FFY 2021 Advocacy Priorities**
  - Funding – COSCDA is supporting $3.8 billion for CDBG in FY21
  - Programmatic – standardize environmental reviews across agencies

- **Other Topics:**
  - Community Development Administrative follow-up – an update from Annual conference on administrative challenges
  - COSCDA sponsored webinar on March 17th EST to offer ideas Community Development Week – April 13 – 17, 2020 and Information is available on COSCDA’s website.
Update from HUD CDBG Officials
Speaker:
Jessie Handforth Kome, Acting Director, Office of Block Grant Assistance, HUD

Jessie Handforth Kome provided the following information updating attendees about HUD’s CDBG and related programs:

- Staffing updates:
  - Jessie is still acting director for the Office of Block Grant Assistance but expects to make a permanent announcement any day.
  - Robert Peterson is still the Acting Director for the State CDBG program.
  - James Hoemann is the new Director for the Entitlement programs.
  - Jessie plans to ask for additional DR staff to assist Tennille Parker and her existing staff.

- Support Act AKA Housing Recovery Act (for transitional housing):
  - Award allocations were announced on 2-18-2020.
  - A website and email box has been set up and award letters sent to Chief Elected Officials.
  - Awards will require a substantial amendment similar to NSP. These should be submitted electronically.
  - These awards will use DRGR – necessary because some states will award funds to non-profits.
  - Funding is not limited to State CDBG eligible local governments. If you plan to make awards to others, a waiver should be requested.
  - New construction may be possible as well as rental housing but states need to discuss with HUD.

- Monitoring Handbook:
  - Chapter 34 for CDBG-DR is coming soon.
    - Contains better guidance on internal controls.
    - Chapter 6 will also be updated.
  - Updated monitoring handbook for state CDBG will roll out in about 18 months.

- Compliance Update:
  - The Regulatory Agenda has been updated. Please review and let HUD know if you have questions. The link is below:
    - https://www.reginfo.gov/public/do/eAgendaViewRule?

- Broadband and Resiliency:
  - All plans must be updated.
✓ For Broadband, the CPD Notice will be coming out (FCC to post) and requires ‘consultation’ and ‘notice’.
✓ For Resiliency, this information is on the CDBG-DR web page.
  ▪ For homes in Floodplains, HUD recommends to move a household, not try to rehab.

• NSP close-out remains a HUD priority.
  ✓ The OIG is eyeing slow movement towards close-out.
  ✓ TA funds are running out.
  ✓ Program Income transfers – can move future PI streams.
  ✓ Can amend target areas.

• Risk Analysis/Monitoring Exhibits
  ▪ CDBG-DR grantees are the guinea pigs

**Housing Sessions**

**HOME Monitoring Guide**
Speakers:
Virginia Sardone, Director, Office of Affordable Housing Programs, Community Planning and Development, HUD
Martha Murray, Senior Affordable Housing Specialist, Office of Affordable Housing Programs, Community Planning and Development, HUD

• This presentation was a helpful big picture overview of the uses of CDBG, HOME and Housing Trust Fund programs to improve housing opportunities. Both presenters were knowledgeable and accessible in their respective training approach.

• The session covered how these HUD programs can be used to support homeownership, rental development, and new construction.

• Pennsylvania’s CDBG example was well received. While the session covered these aspects, additional information would be helpful in the future to cover resident beneficiaries and more materials on how program administration is similar/different.

• Massachusetts’ HTF allocation plan and example projects were helpful to understand how that program works.

**Green and Sustainable Building**
Speakers:
Stan Salwocki, Manager of Architecture and Engineering, Pennsylvania Housing Finance Agency
Shelby O’Neill, Program Officer, Enterprise Community Partners
Chris Thompson, Director of Strategic Housing, Virginia Housing Development Authority
Informative presentations by each of the three knowledgeable people – supported by effective PowerPoints with data and visuals – included the following noteworthy comments:

- Pennsylvania’s Passive House efforts:
  - Excellent detail of the history and impact of QAP updates and incentives regarding Passive House design.
  - PA is confident that Passive House design is not adding costs. Data supports this.

- Enterprise Communities’ Green Building Criteria:
  - Building design either helps or it hurts; it’s never neutral.
  - Integrative design also encourages accountability.
  - Approx. 1/3 of US residents still have lead water service lines.

- Virginia’s Conversion of Storage Containers and Use of Factory-Built Housing:
  - It’s also an inventory question! VA is trying to get more construction going!
  - Modular housing meets state building code, where there are many VA communities that do not allow manufactured housing per zoning restrictions.
  - Shipping container repurposing experience in VA shows a 10% reduction in cost (from traditional stick build).

**Update from HUD HOME/HTF Officials**

Speakers:
Virginia Sardone, Director, Office of Affordable Housing Programs, HUD
Peter Huber, Deputy Director, Office of Affordable Housing Programs, HUD
Vashawn Banks, Director, Financial and Information Services, Office of Affordable Housing Programs, HUD

Ginny Sardone lead her staff in providing the following updates and information about HUD housing programs:

- HUD OAHP staff shared background information about themselves and it’s clear that they are extremely dedicated to the program and have a loyal and seasoned work unit.
  - Staff recognize that there can be simplicity with HOME!

- HUD will be briefing Congress about ways to align environmental requirements across programs, especially HOME and HTF.
HUD staff reviewed IDIS data, noted new and upcoming HOME guidance, listed new or upcoming HOME training, spoke of the upcoming HUD Exchange webpage for notable HOME projects (They will reach out to COSCDA about this, too), reviewed new HTF IDIS reports, spoke of how to address the HOME CHDO set-aside updates, and of upcoming regulatory actions.

- Staff reminded attendees that HUD cannot grant retroactive waivers or extensions; grantees should stay attentive to IDIS warning flags!
- HTF allocations will be issued in April; use 2019 amounts as a guide for the citizen participation process
- Attendees were reminded that if HUD makes a change to any regulation, it has to be tied to a public comment.

Homelessness Sessions

Addressing Youth Homelessness
Speakers:
Nili Soni, Division Director, Office of Special Needs Assistance Programs, HUD
Scott Gary, Supportive Housing Manager, Ohio Development Services Agency
Shaye Rabold, Program Manager, Kentucky Housing Corporation

- The Youth Homelessness Demonstration Program (YHDP) has been approved for two additional rounds of funding. Rural jurisdictions are strongly encouraged to apply, and HUD has set aside funding for 8 rural communities in each round.

- YHDP funding comes with dedicated technical assistance including a lead TA and specialists in youth collaboration, data and education, as well as access to the HUD SNAPS office. A portion of the funding can be spent on planning, providing jurisdictions the option of hiring a consultant to support the development of the coordinated community plan.

- Youth engagement in the planning process and the establishment of a Youth Action Board is a requirement of YHDP, and a significant challenge. Kentucky Balance of State worked with Berea College to collect youth input through qualitative interviews and focus groups in the planning process, and engaged advisory boards at youth drop in centers after struggling to convene youth through webinars and central meetings. Youth engagement was perceived as most effective in the RFP development and award allocation decision-making process.
Issues Impacting Unsheltered Homelessness and Difficult to Serve Subpopulations
Speakers:
Brett Esders, Senior Program Specialist, Office of Special Needs Assistance Programs, HUD
Nicolé McCay, Federal Branch Section Chief, California Department of Housing and Community Development

Some of the key points made at this session were as follows:

- Addressing unsheltered homelessness is very new work for HUD. There is very little data to analyze and HUD is very much in the learning phase.

- Unsheltered populations 3-8 times more likely than general population to have physical disability, mental health issues, or addiction. Also, they are 25% more likely to report all three conditions.

- The homeless population is aging overall – tying back to the overall affordable housing crisis.

- There is a significant gap in the system between traditional permanent housing and PSH/Nursing Care. The “Capable Model” may be one to research more. This model involves visiting supportive services including a nurse, occupational therapist, and a handyman to assess and assist the individual with living on their own in permanent housing.

Coordinated Entry: Best Practice and Reassessing What Works
Speakers:
Leigh Howard, President, Diana T. Myers and Associates, Inc.
Davis Schofield, Continuum of Care Administrator, South Dakota Housing Development Authority
Ryan Vernick, Continuum of Care Coordinator, Arizona Department of Housing

Here are some key takeaways from the Coordinated Entry (CE) session:

- The CE assessment tool should be a part of the picture but not the entire factor in decision making. Many communities use the VI-SPDAT along with case conferencing. Communities should prioritize resources since there is not enough for everyone.

- CE staff should be properly trained and that is a challenge in more rural areas where that may mean shutting down CE for a day.

- There was discussion around waitlist and how to appropriately manage them and if they are ineffective. There is research to support both schools of thought.

- There is a lack of adequate CE resources for youth.
• In some communities, it is difficult to partner with agencies that do not receive HUD funding. There was some discussion about incentives that could be used to get those organizations around the table.

• A few questions were asked around how to monitor CE and ways to assess whether it was a good program. The two speakers from Arizona and South Dakota advised that they are working on those items now. Other participants volunteered to share their monitoring tools.

Update from HUD SNAPS Officials
Speaker:
Norm Suchar, Director, Office of Special Needs Assistance Programs, HUD

Norm Suchar provided the following updates and information regarding HUD homelessness programs:

• 2019 NOFA:
  ✓ Tier 1 grant contracts are being prioritized and contracts will begin being executed within the next week following the conference.
  ✓ Tier 2 award are pending announcement within the next two weeks following the conference.

• Upcoming Activity:
  ✓ Youth Homeless Demonstration grant NOFA will be out in 3-4 weeks. HUD is strongly encouraging applications from rural communities.
  ✓ Unsheltered NOFA – HUD Exchange Mail List will announce this upcoming NOFA in the next few days (came out Friday, February 28).
  ✓ 2020 NOFA has a target release for May with due date in August and award in December. Rating factors will be based on 2018 NOFA with minor edits.

• Future NOFAs (2021):
  ✓ Congress charged HUD to plan for a multi-year NOFA. HUD working on a plan for a two-year NOFA. Norm Suchar led a short discussion with participants in the session on the mechanics of a two-year NOFA and options HUD is considering for addressing the second year. Specifically, there would be no application in year 2; projects renewing for the first time could apply in that year; reallocations would be allowed in the off-year; and if new funds were made available, HUD may have a process to apply for new money or use new data to award new funds in year 2 of that process.