

Continuum of Care (CoC) Program

Grant Amendment Reference Guide for Continuums Having More than One Recipient

(developed by the Philadelphia CPD Office, 3/10/2021)

There are two (2) types of changes: Significant and Minor. Section I and II below outline the allowable Significant and Minor changes and related procedures for non-COVID related amendments. Section III discusses the flexibilities currently available for COVID-related amendments, and the applicable procedures.

I. Significant Changes (formal amendments):

Substantially affect project implementation and represent a departure from the initial application. They require prior HUD approval and, if approved, a formal Grant Agreement Amendment.

A. Significant Changes include:

- Change of recipient
- Change of project site
- Additions or deletions in the types of eligible activities approved for a project
- A shift of over 10% from one Budget Line Item (BLI) to another BLI
- A reduction in the number of units
- A change in the subpopulation served

B. For Significant Changes, recipients must:

- Prepare a detailed written request to the HUD Field Office to amend the grant
- Explain the reason(s) for the change
- Justify that the same or improved level of service will be provided under the amendment
- Additional information as required and requested by the Field Office
- Attach all relevant revised application and technical submission exhibits reflecting the proposed change(s)

C. If the HUD Field Office approves the Significant Change, it will issue a Grant Agreement Amendment to the recipient. The recipient will need to execute and return the Grant Agreement Amendment to the HUD Field Office.

D. Significant Changes need to be reflected in eSnaps:

The eSnaps system (<https://esnaps.hud.gov/grantium/programOffice.jsf>) includes a HELP section which contains guidance for requesting and submitting Amendments in eSnaps.

REMEMBER:

1. CoC Grant Agreement Amendments may be initiated **ONLY** after the CoC Grant Agreement has been fully executed.
2. Amendment requests should be submitted to the HUD Field Office **NO LESS THAN 30** days before the last day of the operating year.
3. **NO** Amendments permitted for any new projects.
4. Amendments to extend the Period of Performance for the grant are not permitted.
5. Approval of substitution of the recipient is contingent on the new recipient meeting the capacity criteria in the NOFA under which the grant was awarded, or the most recent NOFA.
6. Approval of shifting funds between activities and changing subpopulations is contingent on the change being necessary to better serve eligible persons within the geographic area and ensuring that the priorities established under the NOFA in which the grant was originally awarded, or the most recent NOFA, are met.

II. Minor Changes:

Do not substantially affect project implementation and do not represent a departure from the initial application. They do not require prior HUD approval or a formal Grant Agreement Amendment.

A. Minor Changes include:

- A shift of less than 10% from one BLI to another BLI

B. For Minor Changes, recipients must:

- Fully document any changes in the recipient or subrecipient's records
- Maintain documentation and make it available to HUD during on-site reviews or send to HUD if requested
- Submit a request for a budget shift to the HUD Field Office to allow the Field Office to move funds in eLOCCS. A simple email requesting the shift is sufficient.

REMEMBER:

1. The recipient may make more than one budget shift during a grant term. However, at the point when the budget shifts equal more than 10 percent from one approved BLI to another, the recipient must request a Grant Agreement Amendment, which must be approved by HUD before that budget shift can be made.

III. CoC Program Expedited COVID-19 Grant Agreement Amendments:

In response to the COVID-19 pandemic, HUD has determined that an expedited process is necessary for amending CoC grant agreements. The full process for CoC Program Expedited COVID-19 Grant Agreement Amendments can be found at:

<https://www.hudexchange.info/programs/coc/covid-19-grant-agreement-amendments/>.

A. Purpose of Expedited COVID-19 Grant Agreement Amendments:

- Allow CoC grantees to quickly respond to client needs due to the coronavirus
- Reduce processing time by removing multiple steps in the process to allow for quicker field office review and turnaround
- Allow CoC grantees to complete their own agreement, sign electronically, and submit to the field office

B. Grants that can be amended:

- 2018 and 2019 CoC Grants (New and Renewal)

C. Eligible Amendments **MUST** be related to COVID-19 response and include:

Eligible COVID Amendments	Notes
Adding eligible activities not originally part of the CoC grant	This will not carry over to renewal grants
Moving funding between BLIs , including from Rental Assistance	This will not carry over to renewal grants
Extending the operating year of 2018 and 2019 CoC grants to fully utilize all awarded funding	The latest extended operating end date allowed for 2018 CoC grants is 12/31/2020. The latest extended operating end date allowed for 2019 CoC grants is 12/31/2021. This change will impact future renewals by permanently changing the CoC grant's operating start date.

- D.** For CoC Program Expedited COVID-19 Grant Agreement Amendments, recipients must:
- Download the grant agreement amendment request package that has been pre-populated for the Continuum of Care (CoC): <https://www.hudexchange.info/programs/coc/coc-gaa-reports/>
 - Complete the Grant Agreement Amendment request form
 - Sign the Grant Agreement Amendment request form (Electronic Signatures are acceptable)
 - Email the completed Grant Agreement Amendment request form to the Field Office Inbox, and copy the appropriate CPD Representative. The Philadelphia CPD Inbox is CPD_COVID-19AmendmentPHI@hud.gov.
 - Expedited COVID Grant Amendments will not be documented in eSnaps
- E.** After receiving the COVID-19 Grant Agreement Amendment request, the HUD Field Office will take these steps:
- Review the request for completeness
 - Process the Request
 - Make the approved changes in eLOCCS
 - Return an approved Grant Agreement Amendment by email to the grantee

REMEMBER:

1. The expedited process is **ONLY** for coronavirus-related amendment requests. Other non-COVID requests should follow the standard SNAPS Grant Agreement Amendment process.
2. Administrative costs remain capped at 10%.

Additional References:

- Continuum of Care Grant and Project Changes: 24 CFR Part 578.105
- Continuum of Care 2.0 – CoC Grant Amendments Video: https://www.youtube.com/watch?v=Cwn0L_y16KY&feature=youtu.be
- CoC Expedited COVID-19 Grant Agreement Amendment Video: <http://www.hudexchange.info/programs/coc/covid-19-grant-agreement-amendments/#bystate>

****Note - The regulations and requirements for Unified Funding Agencies (UFAs) and Continuums having only one recipient are different (See 24 CFR 578.105(a)(1) and (2)).**