

Austin/Travis County Continuum of Care CoC Grant Amendment Policy & Procedure

GRANT AMENDMENTS: SIGNIFICANT & MINOR CHANGES

This policy applies to all recipients of HUD Continuum of Care (CoC) Program funding in the TX-503 Austin/Travis County CoC. When requesting any changes to CoC-funded projects which are considered grant amendments (i.e. significant changes that are permanent and/or minor changes that are either permanent or temporary), agencies/project staff are required to follow the local policy and procedures before requesting changes with the local field office. That is, required forms must be completed and submitted to the CoC Lead Agency in advance. The CoC Lead Agency will review the agency's information outlining the request to make changes to the grant/project and will be provided a signed Letter of Support for the CoC-funded project to submit to the Local HUD Field Office requesting a grant amendment.

BACKGROUND

- CoC Program Interim Rule 24 CFR Part 578.105 Grant and project changes
- Coc Program Grants Administration User Guide

A written request for a significant grant amendment must be made directly to the local HUD CPD Field Office, who will have final oversight and approval and/or rejection of amendment requests. CoC-funded recipients and subrecipients may not make any changes to a project without prior HUD approval, evidence by grant amendment signed by HUD and the recipient. Although Minor Changes do not require HUD approval, CoC-funded projects must notify the Field Office of these changes in order to update the budget in LOCCS. The Local HUD Field Office has requested that CoC-funded agencies provide a Letter of Support from the CoC Lead Agency when requesting changes including: significant changes and minor changes. Therefore, in order for the CoC Lead Agency to provide a Letter of Support, CoC-funded agencies must provide detailed information regarding the changes and complete the forms outlined in this policy. All changes to projects must be fully documented in the recipient and subrecipient records and documented in the CoC Lead Agency records.

Before submitting the request to the local HUD CPD Field Office, grant amendments (significant changes and minor changes) must be reviewed by the CoC Lead Agency in advance and be provided a Letter of Support.

SIGNIFICANT CHANGES/AMENDMENTS

Requesting a grant amendment for Significant Changes are considered Permanent Changes. Minor changes can fall under this category of Significant Changes if the minor change is requested as a Permanent Change (which will continue to be reflected as an ongoing change in the Grant Agreement, e-snaps applications, and in LOCCs).

Grant amendments that impact how the project is operated are considered Significant Changes:

- Change of recipient (grantee) and/or sub-recipient
- Change in project site

- Permanent change in the subpopulation to be served
- Permanent change in budget
 - Shift of more than 10% of funding from one approved eligible cost category to another
 - o Addition or elimination of eligible costs approved for a project
 - Zeroing out a budget line item is always considered a permanent change.
- A permanent reduction in the total number of units funded under the grant or the number of persons to be served
- Permanent closure of the project funded by the CoC grant
- Minor changes to project budgets that are requested as permanent changes.
- Other significant changes requiring a grant amendment.

MINOR CHANGES

Minor changes are considered temporary amendments that do not substantially affect grant implementation. Examples include:

• A shift of less than 10 percent of program funds from one approved activity to another over the term of the grant.

Requesting Significant & Minor Changes: Amendment Process

The Austin/Travis County CoC Lead Agency is responsible for coordinating the CoC funding application and funding renewal process on an annual basis. CoC grant recipients apply for CoC funding based on a competitive funding process and are awarded using the initial project application. On occasion, a significant change may be necessary to continue to effectively implement the grant. Considering Significant changes represent a departure from the initial, approved application and substantially affect project implementation, these changes must be reviewed by the CoC Lead Agency. The CoC Lead Agency will be responsible for ensuring that all requests align with eligible costs and other rules and regulations related to CoC-funding requirements. Once the requested amendments are reviewed, the CoC Lead Agency will provide a Letter of Support. CoC recipients must attach the supporting document when submitting the approved request to the local HUD Field Office.

Required Documents

For the CoC Lead Agency to provide a Letter of Support, CoC recipients requesting any project changes through the grant amendment process must submit the following Change Request Forms and any additional supporting documents used to communication the changes with the HUD Field Office:

Change Request Form

Select one of the forms based on the type of change being made:

- Significant Change Request Form
- Minor Change: Budget Modification Request Form
- ECHO Letter of Support Template