Closeout Procedures for the Emergency Housing Voucher (EHV) Program



The closeout of the EHV program will be approaching sooner for some Public Housing Authorities (PHAs) than others.

The EHV program is limited to individuals and families who are homeless; at risk for homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking; or recently homeless and for whom providing rental assistance will prevent the family's homelessness or having elevated risk of housing instability. After September 30, 2023, a PHA may not reissue a turnover EHV. This means that all EHVs under lease on or after October 1, 2023, may not be reissued under any circumstance to another family when the participant leaves the program for any reason. Furthermore, PHAs that have reached their cumulative EHV lease-up count may not reissue any EHV after September 30, 2023. As explained in PIH Notice 2023-14, this means if a PHA has 20 authorized units, they can continue to lease until it reaches 20 cumulative **lease ups**. Regardless, the program will be cancelled, as a matter of law on September 30, 2035. To help PHAs track the status of their cumulative EHV leases in comparison to their EHVCACC and their success rate, HUD has provided the EHV data dashboard at www.hud.gov/ehv that uses a 180day lease rate. PHAs are strongly encouraged to review this dashboard regularly and before making decisions to issue EHV vouchers after September 30, 2023.

<u>PIH Notice 2023-35</u> provides closeout procedures for EHV funding. HUD will follow closeout procedures as described on 2 CFR § 200.344.

HOUSING ASSISTANCE PAYMENTS (HAP)

For EHV HAP, HUD will issue a final EHV HAP Reconciliation and Closeout statement to PHAs that cease to participate in the EHV program not earlier than four months after the PHA's EHV program closeout. HUD will compare funds obligated and disbursed to the PHA, minus funds spent reported in the EHV HAP expense field in the Voucher Management System (VMS) through the earlier of the closeout month, or the period of performance (September 30, 2030). Unobligated and unspent funds will be returned to HUD.

This will provide time for PHAs to report and validate their VMS submissions and will provide PIH time to amend the PHAs annual contribution contracts, deobligate undisbursed budget authority and/or schedule requests for payment for EHV restricted net position if insufficient HAP funding has been provided.

ONGOING ADMINISTRATIVE FEES

HUD will issue a final Administrative Fee Reconciliation and Closeout statement to PHAs that cease to participate in the EHV program not earlier than four months after the PHA's EHV program closeout. HUD will compare funds obligated and disbursed to the PHAs, minus funds spent reported in the EHV Ongoing Fee expense field in VMS through the earlier-of the closeout month, or the period of performance (September 30, 2030). Undisbursed obligations and/or EHV unspent unrestricted net position (EHV UNP) will be returned to HUD.

This will provide time for PHAs to report and validate their VMS submissions and will allow HUD time to amend the PHAs annual contribution contracts and scheduling requests for payment for EHV unrestricted net position and cash on hand.

PLACEMENT AND ISSUANCE FEES

HUD will issue a final Placement and Issuance Reconciliation and Closeout statement to PHAs that cease to participate in the EHV program four months after the PHAs' EHV program closeout. HUD will stop processing Placement and Issuance Fees based on PIC reporting, as the PHAs closeout their EHV programs. HUD will compare obligations and funds disbursed to the PHAs compared to funds spent and reported in the Placement and Issuance Fee expense field in VMS through the earlier of the closeout month or the period of performance (September 30, 2030). EHV undisbursed obligations and unspent funds will be returned to HUD.

SERVICE FEES

HUD will issue a final Special Fee Reconciliation and Closeout statement to PHAs that cease to participate in the EHV program no later than the four months after the PHAs' EHV program closeout. HUD will compare funds obligated and disbursed to the PHAs, minus funds spent reported in the EHV Special Fee expense field in VMS through the earlier of the closeout month, or the period of performance (September 30, 2030). Undisbursed obligations and unspent funds will be returned to HUD. This will assist the program office amend the PHAs annual contribution contracts, de-obligating undisbursed obligation/budget authority and/or schedule requests for payment unrestricted net position and cash on hand.

Expenses are fungible between, preliminary fees, ongoing administrative fees and placement and issuance fees with the exception of management fees paid to the Central Office Cost Center (COCC), which is only an eligible expense for ongoing administrative fees. Since the PHA is receiving ongoing administrative fees and placement fees monthly, the PHA should report the costs on the applicable VMS monthly to prevent any overpayment to HUD. Typically, PHAs report expense to preliminary fees, placement and issuance fees and remaining expenses to ongoing administrative fees. This way, any amount of funds remaining would be excess administrative fees. Services fees will be expensed on the applicable VMS field as incurred and offset by the deferred revenue the time the services fee funds were received by the PHA. <u>PIH Notice</u> <u>2023-35</u> was silent regarding preliminary fees.

<u>Contact us</u> today to talk about the closeout procedures for the EHV program for your PHA. BDO's Public Housing Authority practice has served over 400 PHAs and affordable housing providers and is a premier provider of industry education to PHA staff, executives, and HUD employees.

For more information on our service offerings, visit us online.

Our purpose is helping people thrive, every day. Together, we are focused on delivering exceptional and sustainable outcomes and value for our people, our clients and our communities. BDO is proud to be an ESOP company, reflecting a culture that puts people first. BDO professionals provide assurance, tax and advisory services for a diverse range of clients across the U.S. and in over 160 countries through our global organization.

BDO is the brand name for the BDO network and for each of the BDO Member Firms. BDO USA, P.C., a Virginia professional corporation, is the U.S. member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms. For more information, please visit: www.bdo.com.