

Chapter 12: Closeout

Introduction

Upon completion of CDBG approved activities and/or the expenditure of all CDBG funds in compliance with program guidelines, the Grantee enters the final phase in the grant management process known as grant close-out. The close-out process is comprised of a series of activities that together verify that CDBG funds have been properly spent and that the recipient complied with all applicable rules and requirements in the implementation of its program. Recipients will be expected to carry out the project as proposed in the application. The proposed activities should be completed, and the proposed beneficiaries should be served prior to project close-out.

The U.S. Department of Housing and Urban Development's (HUD) closeout requirements for CDBG grant awards for funds administered by the Department are contained in 24 CFR Part 570. Specifically, 24 CFR 570.489(i) – Closeout of grants to units of general local government – states, "The State shall establish requirements for timely closeout of grants to units of general local government and shall take action to ensure the timely closeout of such grants."

The procedures outlined in this chapter must be followed to close out all CDBG grants from HCD.

Grantees should consult their Standard Agreement for other agreed-upon submission deadlines.

Section 12.1 Closeout Process

The closeout process is the final phase of the CDBG project administration. After activities are completed, funds drawn down, and monitoring issues (if any) are addressed, closeout can begin.

The basic closeout process is outlined below.

Step	Action		
1	When project is complete, the Grantee contacts their Grant Administrator/HCD Representative and begins preparation for closing. This preparation includes:		
	Reviewing expenditures to determine whether there will be funds to disencumber		
	 Posting and holding public hearing on final closeout 		
	• Finalizing all written products (for Planning Activities, not applicable to CDBG-CV)		



	 Documenting final hearing to accept final products (for Planning Activities, not applicable to CDBG-CV)
1 a	The Grant Administrator or HCD Representative will contact the Grantee to begin closeout preparations at the end of the contract period of performance if the Grantee has not initiated the closeout discussion.
1b	 If Grantee is unresponsive, the Grant Administrator or HCD Representative will prepare and send a formal Closeout Request email. If Grantee remains unresponsive, the Grant Administrator or HCD Representative will send, by Certified U.S. mail, a formal Closeout Request letter.
2	Grant Administrator or HCD Representative provides Technical Assistance (TA) on closeout process and requirements. This should be an ongoing conversation throughout the closeout process. TA should include:
	 Review of the requirements outlined in this chapter.
	 Review of Appendix 12-1: CDBG Combined Closeout Package
	 Review of the Appendix 12-2: Completion Form, Appendix 12-3: Completion Form Instructions, and include any required 508 assistance.
	 Review of additional documentation required, including any additional documentation based on activity-type requirements.
	Grantee prepares and submits their final Activity Report.
3	 This must be completed prior to initiating closeout in the Grants Network Portal and prior to submission of the final Financial Report.
	 The Activity Report should include an aggregated summary of all project accomplishments during the life of the project in the Narrative.
4	Grantee completes Appendix 12-1: CDBG Combined Closeout Package and Appendix 12- 2: Completion Report AND assembles required supporting documentation.
	All of this information will need to be uploaded at closeout with the final Appendix 6-3: Financial Reporting Form.
	This information must be completed prior to initiating closeout in the Grants Network portal.



	Review of this information should be part of the Grantee's ongoing closeout discussion with their Grant Administrator or HCD Representative.	
5	Grantee contacts Grant Administrator or HCD Representative when they are ready to closeout and submit their final Financial Report.	
6	Grant Administrator or HCD representative reviews the status (including approval status) of any outstanding reports or requirements and informs Grantee of any required actions.	
	Grant Administrator/ HCD Representative notifies Grantee that they can initiate closeout via a notice to the registered email.	
7	* Grantees should not begin closeout in the Grants Network Portal until they have received this notification.	
7a	The email will notify the Grantee they have a Misc Task to be completed. Click the link to view your Misc Task.	
7b	The task will appear as Initiate Closeout in the Grants Network portal on the Pending Tasks page.	

Show 10 ~ entries				Search:		
Task Type	1	Date Created	$\downarrow^{\underline{\mathbb{I}}}_{\underline{\mathbb{I}}}$ Due Date	11	Actions	
MBE/WBE Reporting		09/21/2023	10/20/2023		=	
Initiate Closeout (09/25/2023	10/06/2023		=	
Showing 31 to 32 of 32 entries				Previous	1 2	
Opening the Initiate a simple acknowled	Opening the Initiate Closeout task will bring you to this page. The response here should a simple acknowledgement in the Subrecipient Response section. Grantees should ther					
CIICK THE SUDMIT TA	SK. I his is for notifi	cation only; no	files should be	uploaded.		
Initiate Closeout (T	est 2 9/25/23) - 10/0	6/2023				
Award Detail			Back	to Award Detail		
CDBG - Homekey Set-Aside Awarded Awarded by: California Department of Hd Approved amount: \$2,000,000.00 Project Title: TEST 22 Homekey Hotel Cor Match type: Performance period: 02/28/2022 -06/25/	ousing and Community Development nversion /2025					
Initiate Closeout (Test 2 9/25/23) - 10/	/06/2023					
Task Note: This is a test. Please Initiate closeout in the Grants Network Portal.						
Subrecipient Response:	ubrecipient Response:					
Task Files						
Please upload any files necessary for your t	task.					
Upload File 🕰			Search			
show 10 v entries	IL File Size	11	Actions			
File Name	No files are av	ailable for download		*1		
File Name						
File Name				Previous Next		



8	After submitting the Misc Task, Grantees will initiate closeout in the Grants Network portal by clicking the Award Closeout button on the Award Dashboard page. Award Dashboard Award Detail View Budget View Goals View Files Submit Financial Report Submit Activity Report Award Closeout Manage Project Team Subrecipient: City of Winterendsoon Project: TEST 22. Homekey Hotel Conversion Award Bate: Xward G Approved amount: \$2,000,000.00 Total Federal Award: \$2,000,000.00 Total Federal Award: \$2,000,000.00 Performance period::02/28/2022 - 06/25/2025
9	A pop-up Warning window will appear. The Grantee should click OK only if their GA or HCD Representative has told them they are ready to proceed. • This is critical because once the Grantee initiates closeout in the Grants network portal, they will only be able to submit a final Financial Report. They will no longer be able to submit activity reports or respond to pending tasks. Warning! Are you sure you want to close this grant? This process will walk you through submitting your final financial report. You will not be able to submit further activity reports or complete pending tasks. Any unspent funding will be deobligated and returned to the grantor. Cancel OK
10	Clicking OK takes the Grantee to their final Financial Report.





11	Scrolling down, the Grantee will see a warning under the Financial Report Details section explaining that they should have completed all activity and financial reporting and tasks before submitting this final Financial Report and that, after submission, any unspent funds will be unavailable.			
	Reporting Period: *			
12	Grantee completes the financial report fields to submit their final Financial Report and final <u>Appendix 6-3: Financial Reporting Form</u> , following the procedures outlined in <u>Appendix 6-5: eCivis Financial Reporting Process</u> .			
13	Scroll to the Financial Narrative section, and include as the first line, the phrase, "Closeout – Final Financial Report." Financial Report Narrative * Please develop your narrative bolow including key metrics, spending details, and other pertinent details. W HI H2 H3 B I V III III IIII IIII Closeout – Final Financial Report Protecters remaining			
	Scroll down again to the Financial Report Files section. Click the green Upload button to upload final required supporting documentation.			
13	Financial Report Files Please unload any files necessary For your financial report. This may include financial transactions, receipts, program income, etc Upload File a Show 10 • entries File Name If File Size If Actions No files are available for download Showing 0 to 0 of 0 entries Previous Save & Close Submit Report Cancel			







	The Grantee can now see that the status of their final Financial Report is Pending				
	Approval, and they cannot complete any further tasks or reporting.				
	This award has begun closeout. During this time you may not complete further tasks or reporting. Your grantor is currently reviewing your final report. Please contact them directly if you have any questions during this process.				
	Award Activities				
16	Show 10 v entries Search:				
	Report 11 Reporting Period 11 Created By 11 Date Created 11 Current Status 11 Actions 11				
	Financial Report 05/01/2022 05/20/2022 Kathleen Angle 05/20/2022 Pending Approval View Report				
	Showing 1 to 1 of 1 entries				
	Reload				
17	 The CA HCD closeout approval process begins with review by the Grant Administrator or HCD Representative and proceeds through an internal workflow. Grantees should monitor their portal during closeout approval for any required actions or notifications. 				
	If the final Financial Report is returned for changes, the Grantee will see a status of Changes Requested in the Award Activities section of their Award Dashboard . The Grantee should click Changes Requested to see comments about necessary changes. They should click Review/Resubmit to make changes and additions and to resubmit.				
	Award Activities				
18	Show 10 ~ entries Search:				
	Report If Reporting Period If Created By If Date Created If Current Status If				
	Financial Report 05/01/2022 05/20/2022 Kathleen Angle 05/20/2022 Changes Requested Review/Resubmit				
	Showing 1 to 1 of 1 entries Previous 1 Next				
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	Once the CA HCD approval workflow is complete, the contract is closed, and the Crapton				
19	will receive a notice in their nortal confirming closeout and accentable desk audit and				
	reminding them of record retention requirements				
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Section 12.2 Closeout Document File Naming Conventions

The table below presents naming conventions for files commonly associated with award closeout. For documents not listed in the table, Grantees should use names that clearly indicate what the document is, using the document names provided below as examples.

Document	Naming Convention
Combined Closeout Forms Package	Closeout Package XXXXX (Where XXXXX is the last 5 digits of your award number)
Environmental Remediation Documentation	Env Remediation XXXXX
Completion Report	Completion Rpt XXXXX
Proof of Posting	Posting Proof XXXXX (follow "Posting Proof" by 1, 2, 3) if separate proof documents are uploaded
For Planning Activities: Final Products	This is likely to be a final report. If so, use: FinalProd Rpt XXXXX
For Planning Activities: Documentation of Public Hearing to accept final products	FinalProd Hearing XXXXX
For Planning Activities: Board Resolution to accept final products	FinalProd Reso XXXXX
Closeout Checklist (Grant Administrators and HCD Representatives upload)	Closeout Checklist XXXXX

Section 12.3 Record Retention

Per 24 CFR 570.490(d), Record retention. "Records of the State and units of general local government, including supporting documentation, shall be retained for the greater of three years

24 CFR 570.490(d)

from closeout of the grant to the state, or the period required by other applicable laws and regulations as described in § 570.487 and § 570.488."

This retention period will be 3 years from closeout of the HCD contract with the U.S. Department of Housing and Urban Development (HUD).

HCD cannot close a CDBG Program Year until all activities funded in whole or in part with PY funds have been completed in IDIS and all funds expended. Therefore, the Grantee is required to retain



all records pertaining to the CDBG programs/projects until notified from HCD that records may be destroyed. Refer to Chapter 10: Reporting and Recordkeeping for more information on the records that must be maintained.

Depending on the date of issue, some Standard Agreements may reference other or additional record retention periods. Grantees must abide by the retention period that is the longer of the above-cited retention period or the period listed in their Standard Agreement.

Section 12.4 Change of Use Restrictions

The CDBG regulations contain provisions regarding changing the use of real property within the Grantee's control that was acquired or improved, in whole or in part, with CDBG funds. These

<u>24 CFR 570.489(j)</u>

provisions require that the property be maintained for the original eligible use and to continue to meet a national objective <u>for at least five years</u> after the local unit of governments has received a notice in the Grants Network Portal confirming closeout of the grant. If the project involved acquisition or improvement of real property using CDBG funds in excess of the federal Simplified Acquisition Threshold, during the five years following closeout:

- A Grantee may not change the use or planned use of any such property from that for which the acquisition or improvement was made, unless HCD and Grantee provide affected citizens with reasonable notice of and opportunity to comment on any proposed change.
- The Grantee must have a security document that references the use restrictions.
- The new use of the property must qualify as meeting one of the national objectives and is not
 a building for the general conduct of government. However, if HCD and the Grantee
 determine, after consultation with affected citizens, that the reuse of the property is deemed
 appropriate but is not a CDBG eligible activity and does not meet a national objective, it may
 retain or dispose of the property for the changed use. HCD will require reimbursement in the
 amount of the current fair market value of the property, less any portion of the value
 attributable to expenditures of non-CDBG funds for acquisition of, and improvements to, the
 property. Following the reimbursement to HCD for the CDBG program, the property no longer
 is subject to any CDBG requirements.