ERA2 Early Closeout Checklist

The ERA2 award period of performance ends on September 30, 2025, but ERA2 grantees may opt to engage in "early closeout" by submitting their Final Report prior to that date.

Use this list to conduct a self-assessment about whether you are ready to submit your ERA2 Final Report ("Final Report") to close out your ERA2 Award. This checklist is designed to help support successful closeout but does not necessarily reflect all the closeout preparation activities in which an ERA2 grantee may engage. **Grantees that answer "yes" to any of the applicable questions should consider whether they are ready for early closeout of their ERA2 award.**

Remember, once you have submitted the Final Report to Treasury, *you may not obligate or expend any remaining or returned award funds for __any purpose__.* Post-closeout you will still remain subject to records retention and audit requirements (see ERA2 Closeout Resource for more details).

- ☐ **Do you and/or your subrecipient(s) have any remaining unspent ERA2 award funds?** Because you may no longer spend ERA2 award funds once you have submitted your Final Report, it is critical to ensure that you have completely processed all payments for ERA2 assistance, services, projects, and administrative expenses related to implementing your ERA2 program before you submit your Final Report.

    - o Do you and/or your subrecipient(s) have any unprocessed all final payments for financial assistance, housing stability services, eviction prevention projects, affordable rental housing projects obligations, etc.?
        Note: Be sure that you do __not__ have any prospective ERA2 expenses queued for payment related to rental assistance, utility assistance, housing stability services, operational activities to support affordable rental housing projects, etc. after submission of your Final Report to Treasury. A grantee cannot provide a landlord, utility company, housing stability servicer, or tenant with ERA2 funds for prospective assistance if that assistance will cover period of time after the submission date of the Final Report.

    - o Do you and/or your subrecipients have any incomplete *administrative activities* and/or unliquidated ERA2 award obligations for *administrative expenses* (staff salaries, subawards, contracts, etc.)? Administrative activities may include those to support closeout such as:
        - ▫ Verification that all ERA2 data submitted in the ERA2 Final Report comply with the terms and conditions of Emergency Rental Assistance Guidance, the ERA2 Award Terms, and ERA2 Reporting Guidance including that:
            - ◦ Cumulative program and financial data are complete and accurate, as required by the Quarterly Reporting requirements
            - ◦ Participant Household Payment Data Files are complete and in the correct format, see the Checklist for Preparing and Submitting Template 7
            - ◦ Housing stability services and eviction prevention services are reported appropriately, see ERA Reporting Technical Assistance: Tables 1-5 & Housing Stability (especially page 28)

- ◦ Information about equipment and supplies and tangible real property, as is applicable, is prepared in alignment with SF-428 and SF-429 reporting requirements, see the ERA2 Closeout Resource.
- ◦ Data for "Subrecipient, Contractor, and Beneficiary Records" for organizations that received $30,000 or more in obligations over the award period (a) reflect complete and accurate obligations and expenditures and (b) indicate the correct "entity type" (i.e. "subrecipient," "contractor," or "beneficiary;" see Designating the "Entity Type" on Subrecipient and Subaward Records)

- □ Review and reconciliation of general ledger, accounting, reporting, and bank reconciliation. Review of program policies, procedures, and controls to ensure eligible use of award funds.

  Note: This may involve follow-up with end-beneficiaries (e.g., renters, landlords, utility companies, etc.) to reconcile documentation, as needed. These activities can no longer be funded by the ERA2 award once you submit the Final Report.

- □ Preparation for *post-closeout* activities:
  - ◦ Established staff contacts for Treasury to contact during Treasury's review of the Final Report.
  - ◦ Established staff contacts in Treasury's Portal for any continuing accounting responsibilities (such as, tracking returned funds, verifying the Pre-Debt Notice sent by Treasury at the end of Treasury's review of your Final Report for ERA2 award closeout.

- □ Processes and a resource plan to support ongoing **data security measures** and protection of personally identifiable information.
- □ Processes and a resource plan to support the 5-year documentation retention requirements, in alignment with the ERA2 Closeout Resource Guide (see pages 8, 14, and 15)

- o If you are <u>not</u> on track to expend your total ERA2 award, have you <u>not yet</u> had a meeting with Treasury to discuss your readiness for early closeout?

- □ **Are any <u>activities</u> related to your ERA2 award incomplete?** Before you submit your Final Report to Treasury, you should ensure that there are no ongoing activities that were funded by ERA2 award funds. This includes making sure that all activities performed by subrecipients are complete.
  - o Are any rental and utility assistance payments for prospective services to renter households pending?

    Note: ERA2 funds can only be used to cover eligible ERA2 expenses that occur before the date the ERA2 Grantee submits its Final Report. In other words, if a grantee has paid out funds to cover prospective rent or utility services, those funds can only cover rent or utility services for the months prior to the date of the Final Report submission. For example, if a grantee processes payments of ERA2 funds in December 2024 to cover prospective rental assistance for the months of January, February, and March in 2025, the earliest the grantee could submit the final report would be April 1, 2025, even though the funds were technically expended earlier.

- o *Are all the housing stability services and eviction prevention activities still being funded by the ERA2 grantee's award funds (i.e., these services or operations are ongoing and still being funded by ERA2 award funds)?*
  - *Note: Even if the payment has been made to an organization for providing housing stability services and eviction prevention activities, you should not submit the Final Report until all activities paid for by the ERA2 funds are complete.*

- o If you expended any ERA2 administrative funds obligated to support audit activities per 2 CFR 200.425, are those audit activities that were funded by the ERA2 award incomplete?

- ☐ **Do you expect that returned and/or recovered ERA2 funds will significantly affect total expenditures or obligations?**
  - o What is the likelihood of you and/or your subrecipient(s) continuing to receive returned funds, and would it be possible to redeploy those funds to other renter households by keeping your ERA program open?
    - *Note: Sometimes landlords, utility companies, and other beneficiaries return ERA2 funds. You may wish to delay submitting your final report if you and/or your subrecipients are still regularly receiving returned funds, particularly if your program has mechanisms to redeploy those funds to help renter households. Any funds returned after the final report has been submitted cannot be redeployed or repurposed and must be returned to Treasury.*

  - o Do you and/or your subrecipient(s) expect to recover ERA2 funds?
    - *Note: Only grantees with open ERA2 awards (i.e., not closed out) can redeploy recovered funds. If you and/or your subrecipients are involved in efforts to recover funds, you may want to consider delaying submitting your final report until those efforts have settled, particularly if your program has mechanisms to redeploy those funds to help renter households.*

  - o Do you still need to create an administrative plan for the post-closeout processing of returned funds, for instance:
    - ▫ Establishing a process for routing returned payments.
    - ▫ Establishing responsible staff to process returned payments.

- ☐ **Do you have outstanding compliance items that might affect the reporting in your Final Report? If yes:**
  - o Are you reasonably confident that your calculation of ERA2 award expenditures and households served will not change?

o   Have you considered that only grantees with open ERA2 awards can obligate or expend ERA2 award funds for ERA2 programmatic expenses?

> *Note: If you are in the process of addressing compliance items, you may wish to reconsider engaging in early closeout until after those issues are resolved. Once you submit your Final Report, you will have limited ability to re-obligate or recharacterize funds. Reconsidering the timing of engaging in early closeout may allow you more flexibility to respond to compliance items.*

☐   **Did you use the ERA2 award for an Affordable Rental Housing Project?** If yes, the closeout module **does not yet support closeout** of ERA2 awards that involves these projects. However, you can still prepare for closeout by reviewing these questions:

o   Are any activities associated with ERA2 award payments for affordable rental housing projects (acquisition, construction, rehabilitation, preservation, operations to support affordable rental housing, etc.) incomplete?

> *Note: you should be prepared to affirm in the Final Report that all the activities described as part of the ERA2 funded portion of the affordable rental housing project are complete. The ERA2 project may be part of a larger effort, but the activities described as the "ERA2 Affordable Rental Housing Project" in the Final Report must be completed before you submit the Final Report or by September 30, 2024, whichever comes first.*

o   Do you still need to establish staffing, policies and procedures, and record retention plans for oversight of those projects to meet the requirement of providing affordable rental housing for very low-income families for a period of at least 20 years? This would include:

  ▫   Ensuring that the income limitation is imposed through a covenant, land use restriction agreement (LURA), or other enforceable legal requirement for a period of at least 20 years.
  ▫   Ensuring future deployment of any program income to ensure ongoing alignment with [FAQ 46](#).

o   Do you need to review and prepare for additional Real Property questions, as described in the [ERA2 Reporting Guidance](#)?

o   Do you expect to have *any program income* related to Affordable Rental Housing Projects between the time you plan to submit your Final Report and before September 30, 2025?

  ▫   If yes, you should plan to notify Treasury of any program income earned during the time between submitting the Final Report and before the award period of performance ends on September 30, 2025 in order to remit those funds to Treasury.

Additional Best Practices

The following questions are additional closeout questions that might help you (1) maintain resources for tenants at risk of housing displacement, (2) maintain some of the housing stability infrastructure developed through the implementation of ERA2 award funds, and (3) identify and share "lessons learned" from ERA programmatic efforts.

- ☐ **Have you established any mechanisms to provide ongoing resources to renters?**
  - o To the degree it is appropriate within your community, can you provide educational materials to support tenant housing stability, such as guides to tenant rights, tenant/landlord conversation guides, etc.?
  - o Have you considered developing a referral systems for tenants at risk of displacement, such as contact information for rental counseling, housing stability services, legal aid, etc.?

- ☐ **Have you developed mechanisms to maintain housing service networks and community relations and continue to support renter assistance and homelessness prevention?**
  - o Many communities are continuing to leverage networks built through the ERA programs to support homelessness prevention efforts. For instance, the United States Interagency Council on Homelessness has developed a "Federal Homelessness Prevention Framework" which may provide some promising practices for homelessness prevention, as well as ongoing federal resources.

- ☐ **Have you analyzed, documented, and disseminated lessons learned from ERA?**
  - o Have you documented key processes and strategies, as well as recommendations for future emergency renter programs?
  - o Have you identified a strategy for maintaining the institutional knowledge developed through the ERA programs so that future program administrators may benefit from lessons learned?
  - o Have you considered developing research partnerships to learn from ERA implementation efforts?
  - o Have you contacted Treasury to share lessons learned to inform Treasury maintained materials about lessons learned?

Note: Treasury has developed an Economic Recovery Learning Agenda which lists key questions to better understand the impact of ERA. Initial findings are available at the ERA Research and Evaluation webpage. If you would like to share learnings from your research efforts, you can contact EmergencyRentalAssistance@treasury.gov and/or Treasury's Office of Strategy Planning and Performance Improvement: OSPPI@treasury.gov.