



# U.S. Department of Housing and Urban Development

## Capital Fund Training

### Session 3

## Obligations and Expenditures

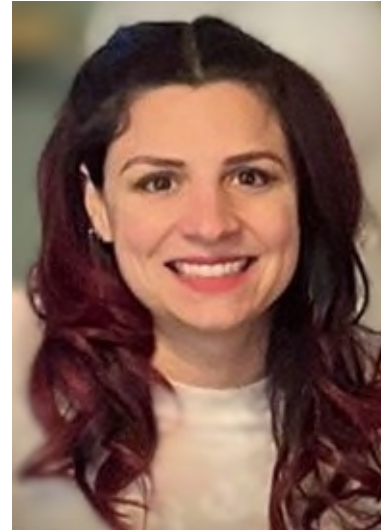




# Presenters: Office of Capital Improvements



**Thomas Shelton**  
Housing Capital  
Improvement Specialist



**Erica Vilardi**  
Housing Capital Improvement  
Specialist



**Sarah Culligan**  
Housing Capital  
Improvement Specialist





# Topics

A vertical strip of five images on the left side of the slide: a blue house, a city skyline, a man in a white shirt, a red brick building, and a yellow excavator.

Overview

Obligations

Expenditures

Procurement & BABA

Closeout

A stylized black and white line-art graphic of a city skyline, located at the bottom right of the slide.



# Process Flow for Grant Reporting

## OCI

- ACC Amendment available on OCI website under Fiscal Year Processing Page
- PHA Signs ACC Amendment

## Document Package EPIC

- Grants are "Notionally" Loaded into EPIC (153 in LOCCS)
- PHA Submits all processing documents through the document manager

## 5YAP EPIC

- PHA Copies Forward 5YAP to Cover Current Fiscal Year (ALL Rolling and Fixed as Needed)
- PHA Submits in EPIC
- HUD Approves

## HUD EPIC

- HUD Reviews Package
- HUD Accepts Package

## HUD EPIC/LOCCS

- Daily HUD Loads 176 (Contracting Grant) in LOCCS based on Accepted Packages
- Daily HUD loads BLI Spread Files based on Submitted Budgets



# Summary of Obligation & Expenditure Requirements

Capital Fund Grant	90% Obligated	100% Expended
Formula Grants	24 Months	48 Months
Disaster Grants	24 Months	48 Months
Lead-Based Paint Grants	24 Months	48 Months
Housing-Related Hazards Grants	24 Months	48 Months
At-Risk Grants	24 Months	48 Months
Emergency Grants	12 Months	24 Months
Safety & Security Grants	12 Months	24 Months

*Months in time from the obligation start date*



# Obligations







# Obligation

---

An obligation is a binding agreement for work or financing that will result in outlays, immediately or in the future.

---

All anticipated obligations must be approved in the 5-Year Action Plan.

---

Obligation occurs when a contract has been signed and dated by both parties.

---

For activities without a contract, obligation occurs on the date of the purchase order or other obligating document.

---





# When does Obligation Occur for...

## General CFP Work

- Obligation occurs when a contract has been executed.

## BLI 1406 – Operations

- Obligation occurs when the funds are drawn down and vouchered - the date of the voucher submission.

## BLI 1408 – Management Improvements

- Obligation occurs when the PHA signs a contract (or executes obligating documents) for eligible work items.

## BLI 1410 – Administration

- Obligation occurs when the PHA budgets the funds in an approved Annual Statement and 5-Year Action Plan.

## Contingency (Now under BLI 1480)

- These funds are never obligated and must be moved to another work category to be obligated, disbursed, and expended.





# When does Obligation Occur for...

## Force Account

- For a single work item, obligation occurs when the work is initiated. For a group of sequentially-related work items, obligation occurs when the first work item is initiated.

## CFFP

- CFP funds used to pay off debt service for CFFP are considered obligated at the release of the formula grant.

## Conventional Development

- Obligation occurs when the development contract is signed.

## Mixed Finance Development

- Obligation occurs at financing closing.

## Predevelopment

- When the PHA enters into a binding contract - such as for architectural and engineering services, demolition and abatement.





# PHA Obligation Reporting



REPORT MONTHLY ON THE  
OBLIGATION AND  
EXPENDITURE OF EACH OPEN  
CAPITAL FUND GRANT IN  
LOCCS



LOCCS WILL SUSPEND  
DRAWDOWNS FOR ALL OPEN  
CAPITAL FUND GRANTS IF  
REPORTING DOES NOT OCCUR




PHAS MUST REPORT ON OED,  
EVEN IF AT 90% OBLIGATION  
OR MORE IN PRIOR  
REPORTING PERIOD





# Extensions of the Obligation End Date (OED)

A vertical collage of five images on the left side of the slide: a blue two-story house, a city skyline with skyscrapers, a man in a white shirt, a multi-story brick apartment building, and a group of people standing in front of a building.

PHAs can only request an extension to the OED if they meet one of the criteria specified in the statute and regulations

Accepted requests are generally those that are beyond the control of the PHA such as natural disasters, etc.

All requests must be received before the current OED

There is no statutory authority to approve OED requests after the OED has passed, or expenditure end date extensions.

Even if there is a request in place, obligation must still occur! Even if the OED has passed.



# OED extension Up to 12 Months

PHAs may request an extension to the OED of **up to 12 months** due to delays caused by:

The Size of PHA

The Complexity of capital program of the PHA

Limitations on PHA ability to obligate in a timely manner as a result of State or local law

Such other factors as the Secretary determines to be relevant



# OED Extension More than 12 Months

PHAs may request an extension to the OED of **more than 12 months** due to:

Delays caused by litigation

Delays that are a result of obtaining approvals of the Federal, State, or local government

Compliance with environmental assessment or abatement requirements

Relocating Residents

An event beyond the control of the housing authority

Any other reason established by the Secretary in a Federal Register Notice



# OED Compliance

HUD may request and/or review some or all PHA documentation supporting the obligation.

The 1937 act requires that all subsequent Capital Fund grants be withheld from a PHA if the OED is not met.

HUD will withhold the PHA's next Capital Fund grant until the PHA obligates at least 90% of its past due grant

When the PHA cures the non-compliance, HUD (HQ OCI) will release the Capital Fund Grant that has been withheld, less any penalty, 1/12 for every month the PHA was non-compliant.





# Expenditures





# What is an Expenditure?



PHA bills that are due and payable



Disbursement - the act of distributing Capital Funds from HUD accounting (LOCCS) to the PHA's bank to pay the bills that are due



Expenditure End Date (EED) - the final date a PHA may expend (pay out) funds drawn from LOCCS for Capital Fund-related expenses



Generally, statute requires 100% within four years of date that funds are made available, or obligation start date

# Are expenditures and disbursements the same thing?

## Disbursements

Disbursements, are automatically determined by LOCCS.

Used by HUD to track EED compliance.

When PHAs voucher Capital Funds, these funds are considered disbursed.

NO!

## Expenditures

Expenditures are PHA self-reported.

Contractor/ vendor bills paid using funds disbursed from LOCCS.

Monthly expenditures must be reported in LOCCS, for each open Capital Fund grant until FO enters a "pre-audit date" in LOCCS.



# Consequences of Noncompliance with EED – Penalties

Funds that are not expended by the expenditure end date (24 months after the OED) will be recaptured.

The CFP grant is reduced to the amount that was expended on the EED.

Obligation of those funds is not sufficient to meet this expenditure requirement.





# HUD Monitoring: De-obligation and Re-obligation

PHA may de-obligate and then re-obligate funds without penalty if a legitimate obligation of Capital Funds must subsequently be “undone” due to a voided contract.

PHA should contact FO to explain

If FO accepts, PHA reports the de-obligation and FO includes a Project Note in LOCCS.

**NOTE: If the expenditure end date has passed, grant cannot be re-obligated and funds must be recaptured.**



# Procurement and Contract Administration







# Procurement and Contract Requirements

A vertical collage of six images on the left side of the slide. From top to bottom: a blue two-story house, a city skyline with skyscrapers, a man in a white shirt standing in front of a building, a red brick building, a group of people in front of a building, and a yellow excavator at a construction site.

## **Procurement with Capital Funds, PHAs must:**

Comply with 2 CFR 200.317-200.326. (substantially the same as 24 CFR 85.36, except for thresholds for micro/small purchases).

Conduct transactions in a manner that provides, to the extent possible, full and open competition.

A PHA must have its own Procurement Policy consistent with 2 CFR 200 and State law.

A PHA have written ethics standards and sanctions.

Perform an independent cost estimate (ICE) for all procurements above micro purchase threshold in 2 CFR Part 200.320.



# Methods of Procurement

Method	Summary
<b>Micro Purchase</b>	Maximum \$10,000, one quote permitted
<b>Small Purchase</b>	Maximum \$250,000, typically three quotes
<b>Sealed Bid</b>	Typically for construction contracts over \$250,000; contract awarded to the lowest bid. "IFB" used when only price is considered
<b>Competitive Procedures</b>	Request for Proposal (RFP) and Request for Qualifications (RFQ) procurements
<b>RFP</b>	Used when price and other factors are "considered"
<b>RFQ</b>	Used when price is not considered
<b>Noncompetitive Procedures</b>	Sole source solicitation after competitive process is deemed inadequate

# 10 Basic Procurement Steps



1

- Develop a Specification or Statement of Work (SOW)



2

- **Complete an Independent Cost Estimate (ICE)**



3

- Determine rationale for procurement method



4

- Solicit & receive quotes/bids/proposals



5

- Determine responsive/responsible bidder, as applicable



6

- **Determine price reasonableness (Cost vs. Price Analysis)**



7

- Award contract



8

- Implement contract administration system



9

- Close out the contract



10

- Maintain records for minimum of 3 years



# Contract Administration and Acceptance of Work

## Inspection and Acceptance Based on Compliance

- Inspect work in progress and goods delivered
- Only pay for acceptable work.

## Guarantees and Warranties

- Specify the guaranty period, amounts withheld and warranties.
- Inspect 3 months after project guaranty period begins, 3 months before expiration, and as needed.
- Require repair or replacement of all defective items prior to the expiration of the guaranty or warranty.

## Notification of Completion

- Require all contractors and developers to notify PHA in writing when contract work will be completed and ready for inspection.





# Wage Rates



## Davis-Bacon

Davis-Bacon and Related Acts require payment of prevailing wage rates and benefits as determined by the Department of Labor (DOL) on federally-financed or assisted construction.

Except for non-routine maintenance work, for all construction contracts exceeding \$2,000.

Includes both on-site and off-site work.

## HUD-Determined Prevailing Wage

Contracts for certain professional services are excluded from coverage by HUD-determined prevailing wage rates, including contracts for inspections and service or maintenance of leased equipment, fixtures, or appliances.

All maintenance (routine and non-routine) contracts in excess of \$2,000.



# Grant Closeout







# GONE Act- OMB/CFP Regulation

## GONE ACT

- Requires grants to be closed out within 2 years after period of performance (POP) end date/CFP expenditure end date (EED).
- Grants not closed out by 2 years are reported to Congress.

## OMB Regulation - 2 CFR 200.344

- Requires grantees to submit closeout paperwork to HUD within 120 days.
- Require grant closeout 1 year after POP end date.
- HUD must report non-complaint grantees to FAPIIS.

## CFP Regulation - 905.322

- Each CFP grant is subject to closeout no later than 12 months after EED.
- Closeout includes:
  - Submission & HUD approval of a cost certificate (AMCC/ADCC);
  - IPA audit if applicable; and,
  - Final Performance and Evaluation Report.





# Closeout Submissions

## PHA submits Closeout in EPIC

- PHA marks Annual Statement/Budget “Final” in EPIC
- If the Field Office or HQ requests, do a Performance & Evaluation Report (P&E Report).
- Submit Cost Certificates
  - Actual Development Cost Certificate (ADCC) (HUD Form HUD-52427) – for development projects
  - Actual Modernization Cost Certificate (AMCC) (HUD Form 53001) – for modernization projects
- All Close-Out related forms may be submitted to the Field Office in EPIC by uploading them to the Document Management Center.





# Penalty for Failure to Submit Cost Certificate and Final Budget

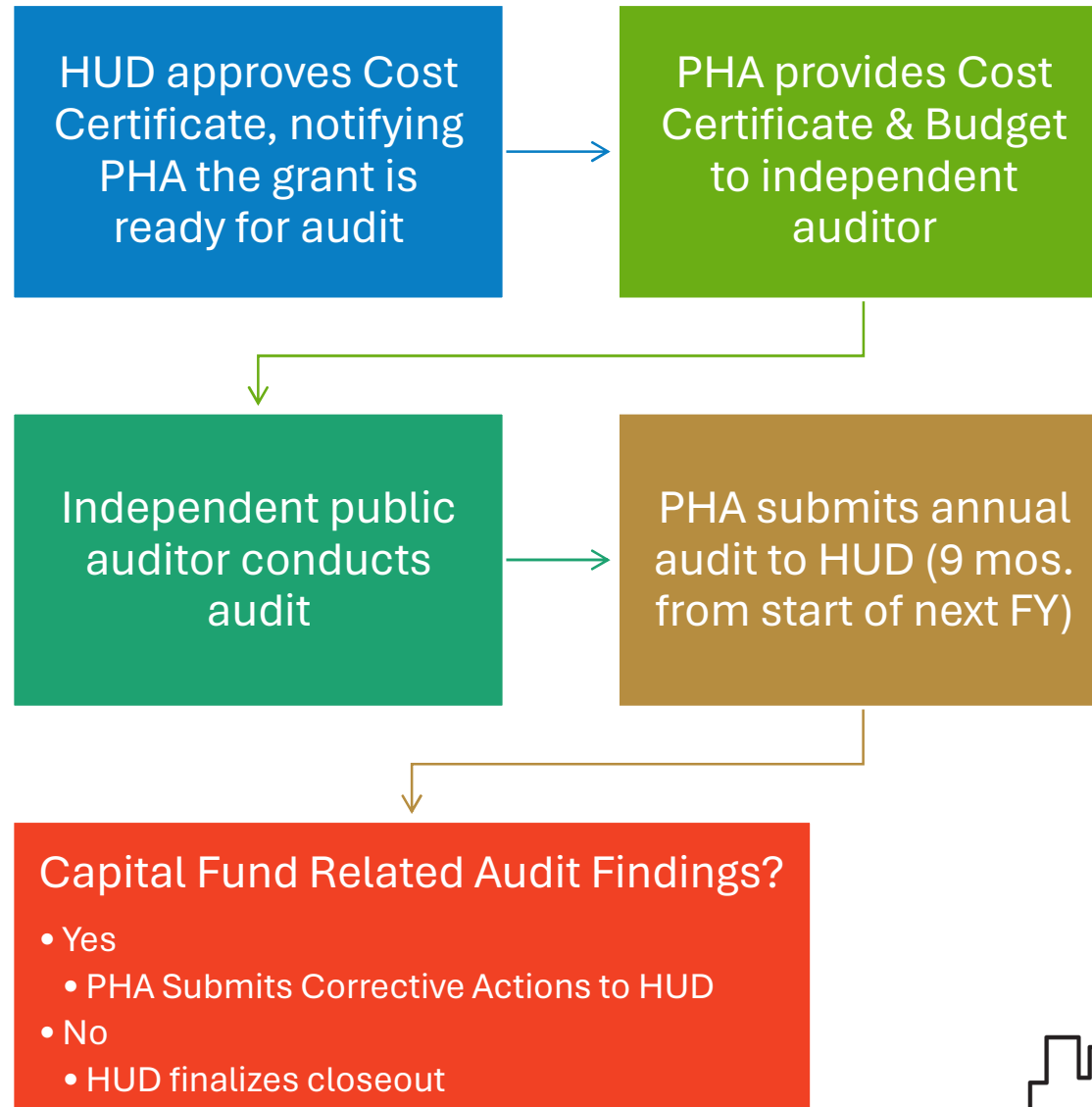
If the PHA does not submit Cost Certificate and final Budget and/or P&E Report timely, HUD may impose restrictions on open Capital Fund Grants until submitted

HUD will notify PHA prior to imposing restrictions





# Audit Procedures



Some PHAs do not expend sufficient federal funds to be subject to the audit requirements in 2 CFR Part 200, Subpart F.





# Review & Approval of Cost Certificate And Audit

## PHAs not subject to annual audit

- HUD will review and approve the Cost Certificate

## PHAs subject to audit

- HUD will review audit to verify costs agree with Cost Certificate
  - If audited Cost Certificate shows excess funds, PHA will remit excess funds
  - If the audited Cost Certificate shows unauthorized expenditures, PHA will take actions per Field Office
  - Once audited costs are reconciled by FO, grant is approved for closeout and PHA is sent a closeout letter

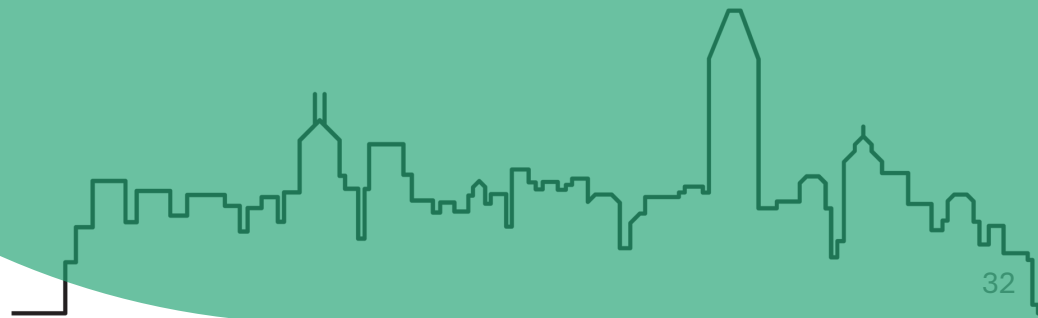
Ft. Worth CFO enters post-audit end date in LOCCS – grant closed



# Thank you!

Next session we will go into more eligibility detail.

*Thank you!*







# Questions



- Time for questions!
- If you think of any after this training, email:
  - [PIHOCI@hud.gov](mailto:PIHOCI@hud.gov)

- Additional Trainings can be found here:  
[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/capfund/learningtools](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund/learningtools)





# Appendices





# Obligation and Expenditure

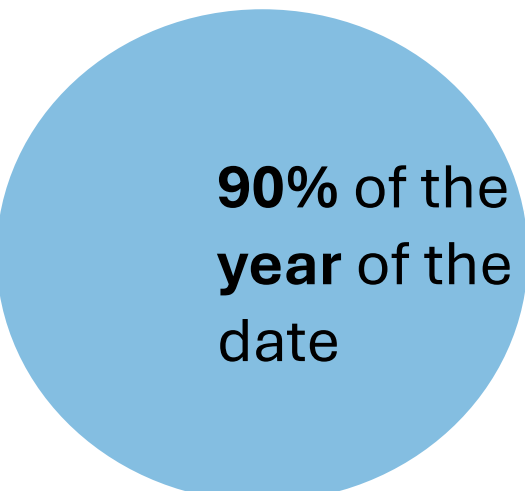




# Obligation Requirements



**90%** of the grant within **Two years** of the obligation start date



**90%** of the grant within **One year** of the obligation start date

Formula Grants

Disaster Grants

Lead-Based Paint Grants

Housing-Related Hazards Grants

At-Risk Grants

Emergency Grants

Safety and Security Grants





# Expenditure Requirements

**90%** of the grant within **Four years** of the obligation start date

**90%** of the grant within **Two year** of the obligation start date

Formula Grants

Disaster Grants

Lead-Based Paint Grants

Housing-Related Hazards Grants

At-Risk Grants

Emergency Grants

Safety and Security Grants



# PHA Obligation & Expenditure Reporting

Monthly obligation/expenditure reporting required until grant is in “Pre-Audit” status in LOCCS.

Draw-downs are automatically suspended if PHA does not report.

Ensure Capital Fund expenditures do not exceed LOCCS disbursements.

Imbalance may be indication PHA has paid Capital Fund expenses from another restricted PHA account, which is prohibited.





# Request for Extension to OED

Submit an email to the OCI that includes:

- PHA Name
- PHA Code
- Grant #
- Grant Amount
- Current % Obligated
- Current OED
- Requested OED
- Statutory Justification





# Ineligible Extension Request Scenarios

The Comptroller at our PHA was the only person with LOCCS access. She left a month ago and we haven't been able to secure LOCCS access for someone else on staff. Can we have more time to obligate our Capital Funds?

Our Executive Director (ED) left 6 months ago and we have been operating without an ED and it has set all of our operations back several months because we just don't have the staff to do it all. Can we have more time to obligate our Capital Funds?





# Example: Penalty Application

## Example #1

The A PHA failed to obligate at least 90% of a FY2018 Capital Fund formula grant by the OED of June 30, 2020

## What Happens?

1. Continue to obligate this noncompliant grant until it can demonstrate a 90% obligation.
2. It achieved the 90% obligation on October 30, 2020 - 3 months and 2 days after the OED.
3. HUD penalizes PHA for 4 months worth of grant on next year's (FY2021) Capital Fund formula grant.



# Contract Related Requirements

Mandatory Contract Clauses - incorporate by attaching HUD forms and incorporating requirements/clauses into the PHA contract.

Assurances of Completion - For each Capital Fund construction contract greater than or equal to \$150,000

A bid guarantee from each bidder equal to 5% of the bid price.

At least one of the following:

- Performance bond and payment bond for 100% of contract.
- Performance/payment bonds, each for 50% or more of contract price.
- A 20% cash escrow.
- **A 10% irrevocable letter of credit with HUD acceptable terms.**
- Any other payment method acceptable to HUD.





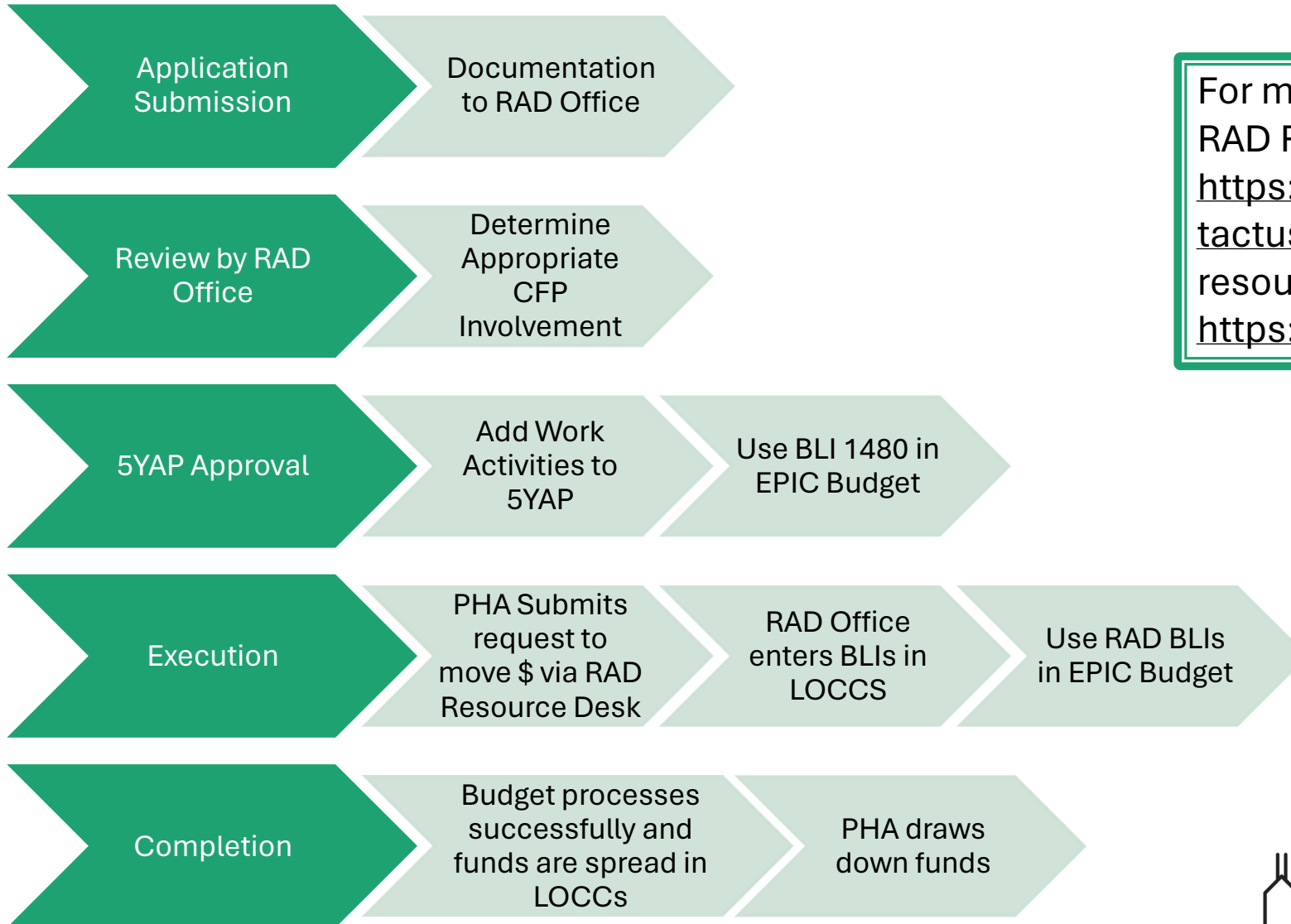
RAD







# RAD Transaction Timeline



For more information contact the RAD Resource Desk  
<https://www.radresource.net/contactus.cfm> and/or see the resources available at:  
<https://www.hud.gov/RAD>







# Steps to Reporting RAD Transactions

Pre-Closing (1480)

5YAP: Create multiple work activities for RAD.

Pre-closing (1480) where the funding set aside for RAD.

Any relevant RAD BLI(s) (1503 and/or 1504) with \$1 Placeholders.

The 5YAP is approved with the multiple work activities (the Piggy Bank may be slightly out of balance-this is OK).

Budgets should only contain RAD Pre-Closing work activity, not other placeholders.

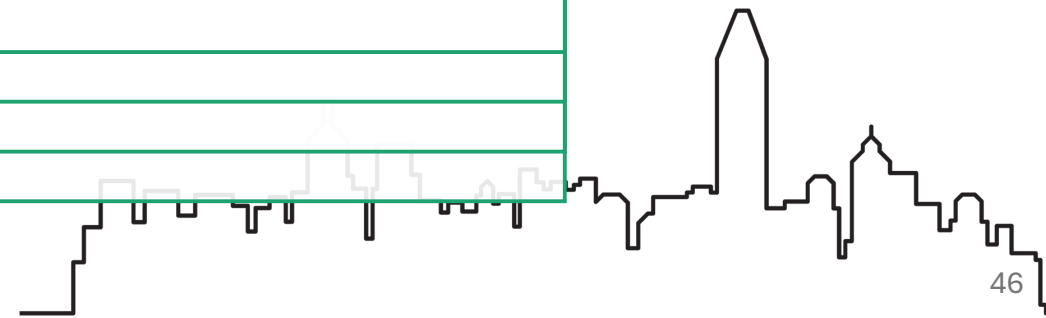
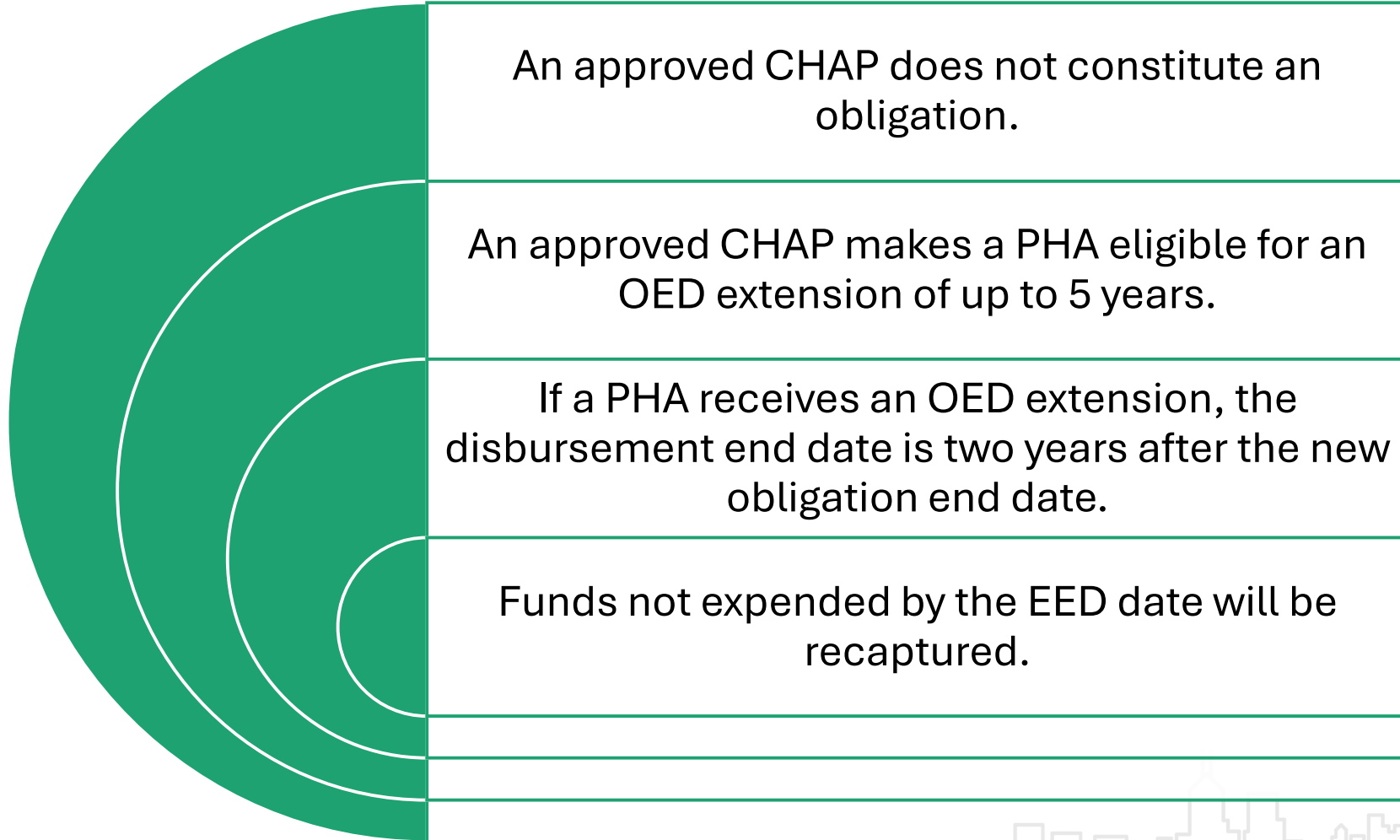
At/Post Closing (1503 or 1504)

Recap office will re-spread the BLIs in LOCCS by moving money from 1480 to either RAD (1503) and/or RAD Investment Activity (1504) based on the approved RAD financing plan.

The PHA will need to revise the Annual Statement/Budget that will match what the Recap office has done in LOCCS. It should import the relevant placeholder RAD work activities into the revised Annual Statement/Budget and remove the *Pre-Closing 1480 Work Activity*.



# Expenditure Requirements for RAD Conversion





# Reporting on RAD and Debt Service BLIS



These BLI's funds are moved in LOCCS first and then Budgets in EPIC must be submitted to match.



For Debt Service, the funds are placed onto the correct BLI by HUD HQ and then automatically disbursed via LOCCS.



These allocations do not get moved until after the transaction has closed.



PHAs need to submit "before" and "after" closing Budgets to reflect the BLI's in LOCCS.



These before and after Work Activities also need to be in the 5YAP.



# RAD BLIs

1480	1503	1504	1505
RAD Pre-Closing	HAP	Source for RAD Conversion	For RAD conversion closing
Used to set funds aside for a RAD transaction until the RAD deal is closed. PHAs cannot use 1406 as a parking lot for RAD.	PHAs place Capital Funds in this BLI for use as Housing Assistance Payments during the year of RAD conversion since the Section 8 conversion does not take effect until Jan. 1 of the following year.	Use this as a source for RAD conversion to cover hard cost of construction, soft costs and/or reserves.	For when a PHA has removed units from PIC for a RAD transaction that is not expected to close for several years, and they want to set aside the Capital Funds for that transaction.



# RAD BLIs

1480	1503	1504	1505
RAD Pre-Closing	HAP	Source for RAD Conversion	For RAD conversion closing
Used to set funds aside for a RAD transaction until the RAD deal is closed. PHAs cannot use 1406 as a parking lot for RAD.	PHAs place Capital Funds in this BLI for use as Housing Assistance Payments during the year of RAD conversion since the Section 8 conversion does not take effect until Jan. 1 of the following year.	Use this as a source for RAD conversion to cover hard cost of construction, soft costs and/or reserves.	For when a PHA has removed units from PIC for a RAD transaction that is not expected to close for several years, and they want to set aside the Capital Funds for that transaction.





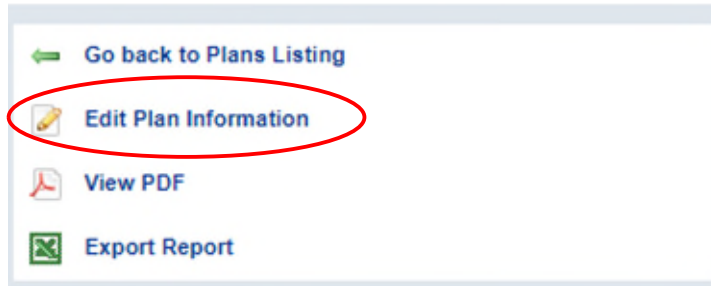
# Non-Formula







# Reporting on Non-Formula Capital Funds



Year 2020:	<input type="text" value="\$118,645.00"/>
Year 2021:	<input type="text" value="\$118,645.00"/>
Year 2022:	<input type="text" value="\$118,645.00"/>
Year 2023:	<input type="text" value="\$118,645.00"/>
Year 2024:	<input type="text" value="\$118,645.00"/>

---

Add the grant amount to the correct year funding estimates in the 5YAP by Editing the Plan Information.

---

To report activities for such a grant, first create new work activities and add the activities to the applicable 5YAP (Revision).

---

For example, if the grant was awarded with 2020 funds, the activities should be added to the Rolling 5YAP plan that begins with 2020 or the Fixed 5YAP that includes 2020.

---

Once those activities are approved by the Field Office, the PHA will then create a new Budget for this new Award/Grant.



# Process for Reporting on Non-Formula Capital Funds (LBP, HRH, Emergency)

## NOT-EPIC

- Signed ACC Amendment Sent to PHA or posted on OCI website
- PHA Signs and Scans ACC Amendment

## 5YAP EPIC

- PHA Edits 5YAP to Cover approved Work Items (eligible items HQ approved during Grant review) for Grant Year of funding Source (last 2 digits in Award) e.g. Grant is 2019 PHAs add items to 5YAP that covers 2019 (Rolling start year = 2019)
- PHA Submits to FO
- FO Approves

## PHA-EPIC

- Grants are "Notionally" Loaded into EPIC (153 in LOCCS)
- PHA Creates Package in EPIC using correct Grant Year
- PHA uploads required documents (refer to NOFO/Notice)

## HUD EPIC

- HUD Reviews Package
- HUD Accepts Package

## EPIC/LOCCS

- Daily HQ Loads 176 (Contracting Grant) in LOCCS based on Accepted Packages
- PHAs Submit Budgets
- Daily HQ loads BLI Spread Files based on Submitted Budgets



# Performance and Evaluation report (P&E)

PHAs that have an approved 5-Year Action Plan and submitted Budget can create a P&E in EPIC.

If PHAs have made any significant changes that would affect the most recent Budget, they must submit a Budget Revision first before creating a new P&E report.

You cannot create a Budget Revision if there is a Draft P&E as it will block creating a new Budget while it is still in Draft form.

Annual Statements/Budget								
Show 10 entries		Search: <input type="text"/>						
Statement	Plan Name	Created Date	Submit Date	Report Year	Status	Actions	Reports	
<a href="#">Annual Statement/Budget Original</a> 	5 Year Action Plan for the 2017 - 2021	01/27/2020	01/27/2020	2019	Submitted			



## WHAT is “BABA”?

“BABA” stands for Build America, Buy America Act enacted on 11/15/2021.

It requires that public housing construction and maintenance projects funded with Cap Fund programs must use products produced in the U.S.

This is referred to as Buy America Preference requirement, or “**BAP.**”

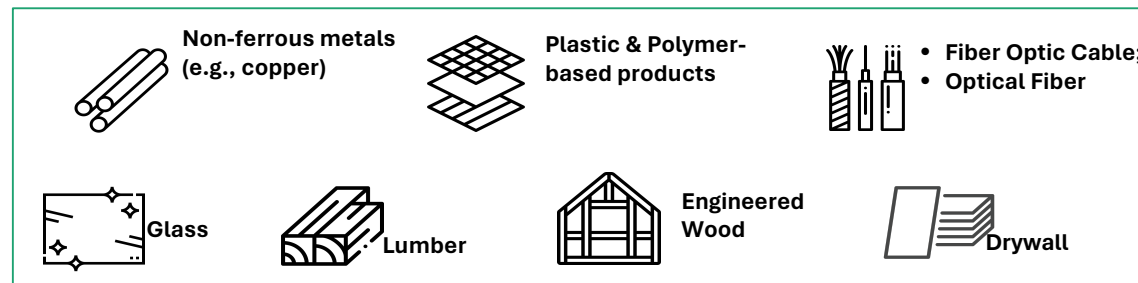
## WHO needs to worry about “BAP”?

- PHAs: Must ensure that the hired contractors use US-made products. If in-house staff (Force Account Labor) does the work, PHAs must purchase US products for the project.
- Contractors/sub-contractors: Must buy and incorporate US made products for projects unless BABA is waived.

Likely all products permanently installed or incorporated for the long term will need to be US made.



Cement & cementitious materials; aggregates such as stone, sand or gravel; or aggregate binding agents or additives are NOT subject to BAP.





WHEN do I need to start worrying about “BAP”?

What if my project is paid by different funding sources?

Depending on **when** the fund paying for the project is **obligated** by HUD to PHAs...



On/After **2/22/2024**

On/After **8/23/2024**

Funds obligated on or after 2/22/2024:

- Does not apply to Maintenance projects;
- BAP required only for the Iron/Steel products;
- E.g., rebars, beams.

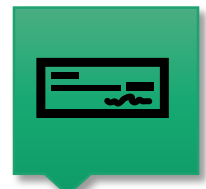
Funds obligated on or after 8/23/2024:

- BAP required for all projects funded by Public Housing programs, including Cap Funds/Operating Funds – both construction and maintenance projects;
- BAP required for all 3 categories of products.

If at least one of the funds is Federal Financing Assistance (“FFA” i.e. public housing grant funds), the entire project needs to comply with BAP.



+



FFA

+



BAP



Is BABA already waived for some grants/projects?

Cap Fund's Emergency & Disaster Grants are waived under Exigent Circumstances.

What if I need a waiver that isn't part of the two waivers already in effect?

Broadly speaking, there are two categories of grants or projects where BABA is waived from BAP requirements (PHAs do not have to apply for these waivers-they are already in effect):

1. "Exigent Circumstances". This exemption applies to projects that cure health & safety issues of residents that should not get delayed or impeded.
2. "De Minimis & Small Grants". This exemption applies if the:
  - Grant amount is less than \$250k, or
  - The total Project Cost is less than \$250k, or
  - Non-BABA compliant products make up less than 5% of the total cost of the project as long as the 5% does not exceed \$1 million. Note: this applies to projects that are \$250K or greater.

You can ask for a waiver for one of the following reasons:

1. Non-Availability:
  - Reasonable Time: I can't find the product in a reasonable time;
  - Adequate Quantity: There isn't enough of the product available;
  - Adequate Quality: Products made in the US doesn't meet the specs.
2. Cost Increase: Purchasing the US products increases the total cost of my project by more than 25%.
3. Public Interest: there is a public interest reason for a waiver (e.g. there is a hurricane that makes it hard to find products in the impacted area).



How do I ask for a  
WAIVER?

HUD has developed an online system for you to submit WAIVER requests (see instructions: [https://www.hud.gov/program\\_offices/general\\_counsel/build\\_america\\_buy\\_america/waiver](https://www.hud.gov/program_offices/general_counsel/build_america_buy_america/waiver)). All waiver requests will be published for at least 15 days for public comment. OMB's "Made in America" Office will review.



All waiver requests must include adequate justification and documentation.

How should I document  
everything?

Here are some practical suggestions:

When hiring a contractor: Include in the contract the requirement to comply with BABA and also record keeping of all the products purchased.

When an architect or engineer is involved: Make it a requirement in the Construction Document to use US made products...specify known products made in the US, or specify that the contractor research and purchase BAP compliant products.

When using Force Account Labor: Create a list of all products purchased indexed to note compliance, waiver, or exempt.

Consider how to prove BAP...

- For small individual items, look for "Made In America" label;
- Ask for certification by product manufacturer or seller/retailer;



# What if I have more questions-need more information?

- PIH Notice 2024-01:

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2024-01pihn.pdf>

- HUD's BABA website:

[https://www.hud.gov/program\\_offices/general\\_counsel/build\\_america\\_buy\\_america](https://www.hud.gov/program_offices/general_counsel/build_america_buy_america)

- Send questions to:

[BuildAmericaBuyAmerica@hud.gov](mailto:BuildAmericaBuyAmerica@hud.gov)

