

## **CSB, CoC, and ESG Invoicing – Frequently Asked Questions**

### **How do I know which invoice form to use?**

Look at your agency's CSB and CoC contracts. For the CSB contract, if you have funding listed in Exhibit A, use the CSB invoice templates. The Allocation column on Exhibit A will determine which CSB invoice template to use. If your agency has a CoC contract, funding is listed in Exhibit 1 and you should use the CoC invoice template. Invoice templates are posted on CSB's website [here](#).

### **How do I know what the budget should be?**

For CSB invoices, the overall budget should match Exhibit A in the CSB contract. The budgets for each specific program should be consistent with the CSB revenue and expenses on the Gateway budget, which is Schedule 3 in the CSB contract.

For CoC invoices, the budget should match Exhibit 1 of the CoC contract.

Throughout the fiscal year, CSB and partners may execute contract amendments that may change program budgets. Always use the most recent Exhibit.

### **How do I know what the Through Prior Month or Through Prior Period should be?**

This amount is the Total to Date from the previous invoice.

### **Can I invoice for more funds than are in the budget?**

No. The 'Balance Left on Contract' column can never be negative for any cost category. Invoices with negative balances will be returned for correction.

### **Can I adjust the budget or budget line item amounts?**

For CSB invoices, you can move funds between the different cost categories as long as the total budget matches Exhibit A in the most recent contract or contract amendment. You don't need to submit a CSB budget reallocation form unless you are requesting to move funding between CSB-funded programs. For ODSA ESG funding, administrative and HMIS budgets are set by the state and cannot be changed. Not all ODSA ESG-funded programs have administrative and/or HMIS budgets. Some ESG funding is restricted to operational costs. Details are on Exhibit A.

For CoC invoices, CSB will ask CoC-funded agencies for budget reallocation requests several times each year. We will ask agencies that want to adjust budgets to fill out the CoC Budget Reallocation Request Form, posted on CSB's website [here](#).

For CoC funding, funds can be moved out of Administration, but not into Administration. If a program has Rental Assistance funding or Section 8 vouchers, the project cannot have Operating funds. For agencies with more than one CoC-funded program, you can move funds between programs, but only for programs that aren't in the first year of operation. Reallocations may change match requirements.

For all other funding sources, administrative costs are allowable within reason. If you adjust fringe benefits or salaries and wages, please explain any fringe benefit rate that is more than 40% of salary and wages.

Each program has a unique mix of funding sources, requirements, and restrictions. Check with CSB when you're not sure what rules apply to your program and we will help clarify.

### **Why do I have to provide detailed descriptions of costs on the Disbursement Journal?**

CSB's funding comes from a wide variety of public and private sources. All of the different sources of funding come with spending restrictions and requirements. CSB has to be able to clearly document that the costs are eligible for each applicable funding source. Invoices with unclear cost descriptions will be returned for correction.

### **How do I know what costs I can include on invoices?**

For CSB invoices, refer to the Financial Guidelines reference document.

For CoC invoices, refer to the HUD Continuum of Care Eligible and Ineligible Costs reference document.

For ESG invoices, refer to the HUD Emergency Solutions Grant Eligible & Ineligible Costs reference document.

These resources are posted on CSB's website [here](#). If you're not sure whether a cost is eligible, please ask.

### **Can the check dates on the disbursements journal be different than the period covered by the invoice?**

Yes, as long as the expense was incurred in the same fiscal year. For example, you can include a February cost on an April invoice because they are within the same fiscal year. If the date of the check is outside the fiscal year (e.g., July), but the expense was incurred within the previous fiscal year (e.g., June), the cost is eligible on the June invoice, but make it clear in the description column in which fiscal year the cost was incurred. Any exceptions for specific funding timeframes and amounts will be noted on Exhibit A.

### **Can I include expenses that I have also billed to other funders?**

No. Eligible expenses billed to other funders can be used as match on CoC invoices.

### **Do I really have to get invoices signed by someone other than the person who prepared them?**

Yes. Invoice submissions must include 1) a PDF of the Invoice tab, with the name of the person who prepared the invoice and the signature of the person who certified the invoice OR an email from the person who certified the invoice confirming approval. Always send an Excel version of **both** the Invoice tab and Disbursement Journal tab. We need to keep an approved invoice on file for audit purposes, to confirm authorization for requested payments. All fields highlighted in yellow must be filled out.

### **Why can't I change the formulas on the invoice templates?**

You shouldn't need to change the formulas. Contact CSB if you have trouble with any of the invoice templates.

### **When are invoices due?**

Invoices are always due on the last day of the month for the previous month. For example, August invoices are due no later than September 30. Let us know if you need additional time – we can make exceptions to the deadline depending on the circumstances. The only routine exception is for June invoices. We extend the deadline for June invoices so that everyone can include all relevant expenses in the final invoices of the fiscal year. This annual extended deadline is final.

### **Why do you have to monitor CoC and ESG invoices both before and after they are paid?**

HUD requires CSB to review invoices for cost eligibility and accuracy before they are paid AND requires CSB to do an in-depth monitoring of 10% of all CoC and ESG costs after invoices are paid. This is part of CSB's role as the Unified Funding Agency. If a cost cannot be documented, don't include it on invoices. Partners should keep the following documentation for each invoiced cost:

- < Verification of each expense (e.g., vendor invoices, bills, reimbursement requests, etc.) with evidence the internal agency expense approval process was followed.
- < A copy of the check or ACH payment confirmation.
- < Signed employee timesheets and payroll records, including benefits records. Timesheet signatures can be physical or electronic.
- < For rental assistance or leasing costs, maintain leases, fair market rent/rent reasonableness calculations, inspection forms, and lead-based paint forms.
- < Cost allocation calculations, as applicable. HUD has approved two cost methods for allocating direct costs between programs or funding types: 1) full-time equivalents and 2) households served.

### **Why do I have to provide HMIS numbers for client rent costs?**

We ask you to provide HMIS numbers for rent and security deposit costs so we can verify that the client listed is enrolled in the program in HMIS. If the client is not active in the program, or DCA has not been approved for RRH programs, the cost is not eligible for reimbursement. When we reconcile the invoice information with HMIS, we can catch clients who might have been missed, rent that could be invoiced for, and data that may have been entered incorrectly. This helps keep both our invoicing and HMIS data accurate. We will ask you about any discrepancies we find. We also understand there are inevitable delays between program entry, data entry, and invoicing.