

Housing Trust Fund Basics - Webinar Series

Day Three

Using WebEx: Q&A



HTF Basics Series Agenda

Session 1

- HTF Overview
- Key program features
- Eligible grantees and recipients
- HTF formula factors
- Allocations
- Distribution of Assistance
- HTF Allocation Plan
- HTF-specific requirements
- Program Requirements
- Eligible Activities

Session 2

- Eligible Project Costs
- Operating Costs
- Eligible Administrative and Planning Costs
- HTF and Public Housing
- Prohibited Activities and Fees
- Income Targeting
 - 100% ELI (total HTF available for allocation < \$1 billion)
 - VLI up to 25% of grant (total HTF available for allocation > \$1 billion)



Session 3

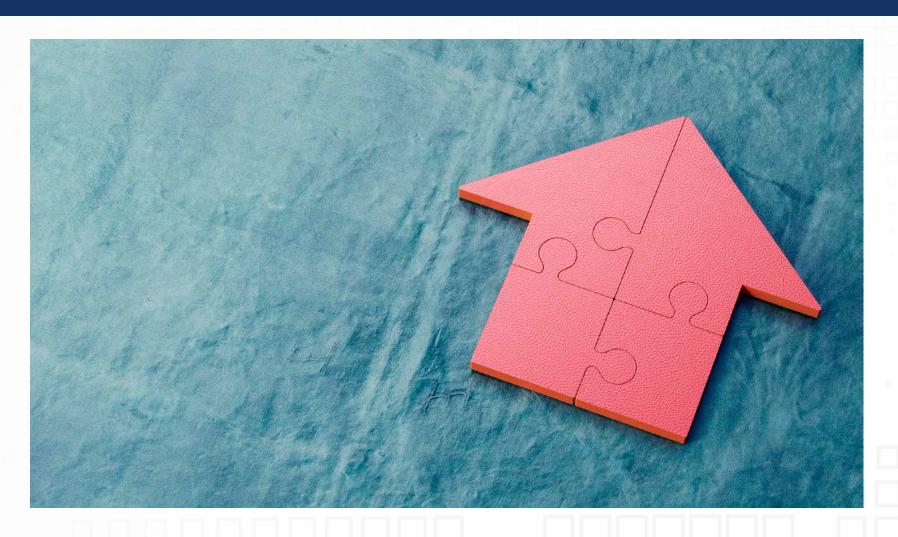
- Underwriting
- Property Standards
- Rental Housing Requirements
- Homeownership Activities
- Other Federal Requirements
- HTF Accounts
- Program Disbursement and Information System
- Program Income and Repayments
- Grantee Responsibilities
- Recordkeeping
- Resources





Project Requirements: Subpart G









Maximum Per-Unit Development Subsidy Amount



- Grantee must establish maximum limitations on the total amount of HTF funds that may be invested per-unit for development of non-luxury housing, with adjustments for the number of bedrooms and the geographic location of the project
- These limits must be reasonable and based on actual costs of developing non-luxury housing in the area
- The grantee must include these limits in its consolidated plan and update these limits annually





Underwriting and Subsidy Layering



- Before committing funds to a project, the grantee:
 - Must adopt underwriting and subsidy layering guidelines
 - Must evaluate the project in accordance with guidelines to determine a reasonable level of profit or return on recipient's investment
 - Must not invest any more HTF funds, alone or in combination with other governmental assistance, than is necessary to provide quality affordable housing that is financially viable for a reasonable period (at minimum, the period of affordability in §93.302 or §93.304)
 - Will not provide a profit or return on the recipient's investment that exceeds the grantee's established standards for the size, type, and complexity of the project





Underwriting and Subsidy Layering Guidelines



- Guidelines must require the grantee to undertake:
 - An examination of the sources and uses of funds for the project
 - including any operating cost assistance, operating cost assistance reserve, or project-based rental assistance that will be provided to the project
 - A determination that the costs are reasonable
 - A market assessment
 - Experience of the recipient
 - Financial capacity of the recipient
 - Firm written financial commitments for the project





Property Standards





- New construction projects
 - Must meet all applicable State and local codes, ordinances, and zoning requirements.
 - Must meet State or local residential and building codes, as applicable
 - In the absence of a State or local building code, must meet the International Residential Code or International Building Code (as applicable to the type of housing) of the International Code Council.
 - The housing must meet the applicable requirements upon project completion



New Construction Standards



- Accessibility must meet the Section 504 and Fair Housing Act standards
- Energy Efficiency standards as defined by Section 109 of the Cranston Gonzalez National Affordable Housing Act
- Disaster Mitigation Projects located in areas at risk of impact from disasters such as earthquakes, hurricanes, flooding, and wildfires are required to adopt appropriate disaster mitigations standards to address the risks(s)
- Contracts and construction documents must provide adequate detail so that inspections can be done to document compliance





Rehabilitation Standards



- Grantees must establish HTF rehabilitation standards
- Standards must define life threatening deficiencies to be addressed prior to occupancy
- Remaining useful life for all major systems must be at least equal to the affordability period or ensure adequate reserves to handle replacements
- Projects with 26 or more units total must complete a capital needs assessment
- Units constructed prior to 1978 need to comply with the Lead Safe Housing Rule requirements at 24 CFR Part 35





Acquisition of Standard Housing



- Housing acquired that is newly constructed or rehabilitated within the last 12 months prior to the HTF commitment must meet the applicable property standards for new or existing structures
- Grantees must review and approve building plans and the Certificates of Occupancy to determine compliance
 - Review must be completed within 90 days of the commitment of the HTF assistance.
- Any property to be acquired that does not meet the applicable HTF building standards will need to be rehabilitated to meet the rehabilitation standards





Manufactured Housing



- Manufactured Housing Unit eligible for purchase or rehabilitation
- Land acquisition is eligible
- At project completion
 - Must be connected to permanent utility hook-ups
 - Located on land owned by the manufactured housing unit owner; or
 - Manufactured housing unit owner must have a lease for a period at least equal to the applicable period of affordability





Ongoing Property Standards: Rental



- HTF grantees must establish ongoing property standards to be enforced throughout the affordability period
- Standards must ensure:
 - The units remain decent, safe, and sanitary
 - Units are free from health and safety defects
 - Lead based paint requirements at 24 CFR Part 35 are met
 - Ongoing property inspections must be completed within 12 months of project completion and at least once every three years thereafter until the completion of the affordability period





Rental Housing 93.302





- Qualifications for HTF Affordable Rental Housing include:
 - Eligible Tenants
 - Rent limitations
 - Affordability Period
 - Tenant Income Certifications
 - Over-Income tenant corrective actions for fixed and floating HTF units





Eligible Tenants



- HTF units must be occupied by income eligible households
- Eligibility is limited by the income targeting requirements at 93.250
- Applicable limits depends on amount of HTF funds made available by GSEs
- Tenant incomes must be determined initially in accord with 93.151
- Tenant incomes must be re-certified annually in accord with 93.151(b)
- Source documentation of at least 2 months must be reviewed at initial determination and every 6th year of the affordability period





Rent Limitations



- HUD will publish the HTF rent limits annually based on number of bedrooms
- HUD publishes HTF rents limits with adjustments for the number of bedrooms annually
- Maximum rent limits include the tenant paid rent along with all tenant paid utilities
 - Extremely Low-Income rent limits (30% and below)
 - Rent plus utilities may not exceed the ELI HTF limits as determined by HUD annually
 - Very Low-Income rent limits (50% and below)
 - Rent plus utilities may not exceed the VLI HTF Rent as determined by HUD annually
- Maximum rent for HTF units in combination with project-based subsidies can go up to the maximum Federal or State rental subsidy limits if the tenant pay no more than 30% of their adjusted household income





Rental Housing Requirements



- Tenant selection requirements
 - Waiting lists in chronological order of application
 - Can be targeted to specific populations
 - Must be included in written agreement and HTF Allocation Plan/Con Plan
 - Preferences cannot violate nondiscrimination requirements
- Must have written lease between tenant and owner
- Owner may not terminate tenancy or refuse to renew the lease for HTF units except for serious or repeated violation of the lease terms





Prohibited lease terms listed at 93.303(b)(1-9)



- Leases may not include any prohibited clauses:
 - Agreement to be sued
 - Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties.
 - Waiver of the owner or the owner's agents legal responsible for any action or failure to act
 - Agreement that the owner may institute a lawsuit without notice to the tenant
 - Agreement by that owner may evict without instituting a civil court proceeding
 - Agreement to waive any right to a trial by jury
 - Waiver of right to appeal court decision.
 - Agreement to pay attorney's fees or other legal costs even if the tenant wins in a court proceeding by the owner against the tenant
 - Agreement to accept supportive services that are offered





Additional Rent Requirements



- Grantees must establish an initial rent schedule and utility schedule prior to committing HTF dollars
- Grantees must review and approve proposed rent and utility schedules annually
- Rents cannot exceed the maximum HTF rent limits minus tenant paid utilities





Tenant Income Certifications



- Annual income definition
 - Annual income as defined at 24 CFR 5.609 (Part 5); or
 - Adjusted gross income as defined for purposes of reporting under the IRS Form 1040
- One definition per program and rental housing project
- Subsequent Annual Income Determinations:
 - Source documents; or
 - Written statement and certification from family; or
 - Written statement from government program administrator





Affordability Period



- HTF units must remain affordable for a minimum of 30 years
- Grantees may impose longer periods of affordability
- The affordability period is not tied to the term of the loan for the HTF assistance
- Affordability restrictions must be enforced through the use of a deed restriction or land covenant restricting the use of the property during the HTF affordability period and ensuring occupancy and affordability requirements





Foreclosure



- If the terms of the affordability period are terminated due to foreclosure or transfer in lieu of foreclosure the project will be in violation of the HTF requirements
- Grantees may impose a right of first refusal to allow for preemptive purchase of housing if the property is at risk due to a pending foreclosure to preserve the affordability





Over Income Tenants



- Annual income re-certification may determine current tenants are over-income but tenants will <u>not</u> be required to move
- HTF units occupied by over income tenants will be considered in temporary noncompliance until the non-compliance can be corrected
- Property owners/managers are expected to make corrections to the unit mix, when possible, to bring the temporary non-compliant units back into compliance
- The corrective action is based on whether the unit has been designated as a fixed or floating unit





Fixed Versus Floating Units



Fixed Units

- Fixed units keep their unit designation throughout the affordability period
- Over income tenants in a fixed unit will have their rent raised to 30% of their adjusted household income at lease renewal

Floating Units

- Floating units allow the property manager to redesignate units within the property to maintain compliance with the required unit mix and affordability requirements
- Over income tenants in a floating fixed unit will have their rent raised to 30% of their adjusted household income or area market rents (whichever is lower) at lease renewal





Knowledge Check



Homeownership Housing





- Projects include new construction, acquisition/rehab, or direct assistance to homebuyers
- Limited to first-time homebuyers
- Must use as principal residence
- Housing counseling is required before purchase
- Resale/recapture requirements apply





Modest Housing



- Housing for acquisition must qualify as modest
 - The purchase price cannot exceed 95 percent of the median purchase price for either new construction or existing housing in standard condition
- HUD provides limits for both newly constructed units and existing housing; annual limits are posted at

https://www.hudexchange.info/resource/4982/housing-trust-fund-homeownership-value-limits/

• Grantees may choose to complete a local study of aggregate sales data as outlined at 93.305(a)(2) and submit for HUD review as a part of their consolidated plan and action plan





Recapture/Resale



- At project commitment, the grantee must select the compliance requirement during the period of affordability – Recapture or Resale
 - HTF requires a 30-year affordability period for Homebuyer projects
- Grantee must choose Resale OR Recapture
- Option must be described in Consolidated Plan
- Recapture/Resale provisions need to be adequately described within the Con Plan to provide transparency on how the grantee will implement either provision





Recapture



- Recapture = sell to anyone, but pay back all or a portion of the subsidy
- Amount to be paid back to grantee determined by recapture provisions
- Subsequent homebuyers may assume the HTF assistance if:
 - Subsequent buyer is income-eligible
 - No additional HTF assistance provided
- Grantee cannot require initial buyer to sell to income-eligible buyer





Resale



Resale

- Sell to very low-income buyer at affordable price
- Occupy unit as principal residence
- Must receive fair return upon sale
- Grantee must define "affordability" and "fair return" in Consolidated Plan
- Grantee may use a right of first refusal and additional HTF if needed to preserve the unit as affordable while seeking an income eligible buyer
- The total of the initial and any additional HTF invested cannot exceed the maximum subsidy limits





Defining Direct Subsidy



- Direct subsidy to the Homebuyer:
 - Financial assistance that reduces purchase price for homebuyer below market OR otherwise subsidizes the homebuyer
 - Examples:
 - Down payment assistance
 - Purchase financing
 - Principal reduction
 - Closing cost assistance





What Is Subject to Recapture?



- Buyer pays back some or all "direct subsidy to the homebuyer"
 - Amounts provided directly to the buyer:
 - Down payment / closing cost assistance
 - Subsidized loan

AND

- Amounts that write cost below market
- May sell to any willing buyer at subsequent sale at any price





Amount Subject to Recapture



- HTF assistance that is subject to recapture is based on the amount of HTF assistance provided to the homebuyer
- Calculation to determine the available net proceeds

Sale Price

- Superior Non-HTF Debt
- Closing Costs
- = Net proceeds





Actual Recapture Amount



- Based on the Grantee's recapture requirement as approved by HUD and capped by net proceeds
- Options approved by HUD:
 - Recapture amount of direct HTF subsidy to the homebuyer;
 - Forgive direct HTF subsidy pro-rata over the affordability period;
 - Proportionately share net proceeds; or
 - Allow buyer to recover his/her initial investment first.
- Can combine any of these options with shared appreciation





Other Federal Requirements



- Title VI of the Civil Rights Act of 1964, the Fair Housing Act
- Affirmative Marketing
- Lead Based Paint Lead Safe Housing Rule (LSHR)
- URA applies for displacement, relocation, and acquisition
- Conflict of Interest
- Different Environmental Requirements
- No Part 58 requirement for HTF
- Environmental laws included in property standards
- Fewer Federal cross-cutting requirements for HTF
- No Davis-Bacon labor rates or Section 104(d)





HTF Environmental Regulations



- HTF Environmental Provisions for new construction and rehabilitation under the Property Standards at 24 CFR § 93.301(f)(1) and (2) are similar to HUD's Environmental Regulations at 24 CFR Parts 50 and 58
- HTF Environmental Provisions are outcome based, and exclude consultation procedures that would be applicable if HTF project selection was a federal action
- Parts 50 and 58 are process-based and include consultation procedures for several laws and authorities where there may be environmental impacts.





Environmental Provisions that are the Same



- HTF Environmental Provisions consistent with Part 50/58 process:
 - Coastal Barrier Resources System
 - Coastal Zone Management
 - Explosives and Hazards
 - Endangered Species (informal consultation)
 - Wild and Scenic Rivers
 - Sole Source Aquifers





HTF Environmental Provisions that are Different



- The following Environmental Provisions are not the same as the Part 50/58 process:
 - Historic Preservation
 - Farmlands
 - Airport Zones
 - Floodplains
 - Wetlands
 - Contamination
 - Noise
 - Safe Drinking Water





HTF Only Project Flexibility



- When a project is only using HTF funds
 - No Level of Review (CEST/EA)
 - No Public Comment
 - No Request for Release of Funds and Certification
 - No Authority to Use Grant Funds
 - Additional Resources and training are available on the HUD Exchange – see resource list





Affirmative Marketing



- Affirmative Marketing
 - Grantee must adopt affirmative marketing procedures for rental projects with 5 or more units and for homeownership assistance programs;
 - Affirmative Marketing must include:
 - Marketing methods to be used for public, owners, and potential tenants
 - Equal Housing Opportunity logo (in all written communication)
 - Grantee's Affirmative Marketing procedures
 - Procedures to solicit applications from persons least likely to be aware of the housing opportunity
 - Standards for records to be maintained
 - Process for annual assessment of affirmative marketing actions
 - Requirements for subgrantees to follow grantee's procedures
 - Tenant preferences must be in accordance with 93.303(d)(3)





Federal Lead Regulations



HUD – 24 CFR Part 35 • Subpart A: Lead Disclosure Rule

- Subpart B: General LSHR Requirements & Definitions
- Subpart H, J, K, L, M: LSHR Program Requirements
- Subpart R: LSHR Methods and Standards

EPA – 40 CFR Part 745

- Subpart F: Lead Disclosure Rule
- Subparts D, L, Q: Lead-Based Paint Activities Rule
- Subparts E and Q: Renovation, Repair, and Painting (RRP) Rule

Note: Recent changes in the EPA rule went into effect on **January 6, 2020** and additional proposed rule changes were released on **6/17/2020**



Key Lead Definitions



- Target Housing housing built before 1978, with some exceptions
- Lead-Based Paint Hazards (ref. §35.110)
 - Deteriorated LBP
 - Dust with lead-levels at or above the dust-lead hazard standard
 - Soil with lead-levels at or above the soil-lead hazard standard
 - Friction, impact or chewable surfaces with LBP and an associated dust-lead hazard
- Lead-Based Paint paint or other surface coatings that contain lead equal to or exceeding 1.0 mg/cm²





Key Steps in LBP Compliance Process









TREAT*





Pamphlet

Enhanced visual • assessment

LOOK

- Risk assessment •
- Inspection

- Standard **Treatments**
- Interim controls
- Hazard abatement

Clearance

Notification

TELL





Displacement, Relocation, and Acquisition



- HTF grantees must follow the requirements of the Uniform Relocation Assistance and Real Property Policies Act of 1970 49 CFR part 24
- Grantees are required to minimize displacement of persons, families, businesses, and non-profits
- Initiation of Negotiations (ION)
 - Eligibility for a displaced tenant begins at the execution of the funding agreement
 - At the ION HTF grantees are required to provide all tenants a notice of eligibility for relocation benefits or a notice of non-displacement
- Anyone displaced is eligible for relocation assistance under the URA





URA Displacement



- Populations covered under URA
 - Any person who moves from real property or moves their personal property from real property as a direct result of an acquisition by a Federal agency or with Federal financial assistance.
 - Any person who moves without being provided the required notices is also considered displaced
 - URA covers individuals, family, partnership, corporation, or association
- See 49 CFR 24.2(a)(9) for the full definition
- Must be provided required notices and information of their URA rights
- Relocation assistance for both permanent and temporary displacement
- At the completion of the project all occupants will be given an opportunity to lease and occupy a suitable, decent, safe, sanitary, and affordable unit





Conflict of Interest



- Conflict of interest provisions apply to all employees, agents, consultants, officers, and elected or appointed officials of the grantee or subgrantee
- No person in a decision-making position or with insider information may obtain a financial interest or benefit directly or indirectly with respect to the HTF activity
- No recipient assisted with HTF funds may occupy a HTF assisted unit during affordability period
- Grantees may submit a written request to HUD to request an exception on a case-by-case basis. An exception request must include:
 - Disclosure of the nature of the conflict and the public disclosure
 - An opinion from the grantee's legal council demonstrating that the interest for which the exception is sought will not violate state or local law
 - Description of how the grantee proposes to withdraw the affected person from the assisted activity decision making process
- The grantee can only implement a waiver of the conflict of interest after receiving HUD approval





Additional Requirements



• FFATA

 HTF grants are considered a federal award and must comply with the Federal Funding Accountability and Transparency Act of 2006

Eminent Domain

• HTF cannot be used in conjunction with property taken by eminent domain, unless eminent domain is employed only for a public use, except that, public use shall not be construed to include economic development that primarily benefits any private entity.





VAWA



- Violence Against Women Reauthorization Act (VAWA) as defined in 24 CFR part 5, subpart L applies to all rental housing assisted with HTF funds
- VAWA protects any person who is either an applicant or tenant of a covered project **and is also a** survivor of domestic violence, dating violence, sexual assault, or stalking





VAWA - cont'd



- Grantee must provide a notice and certification form per 24 CFR 5.2005(a) to applicant denied a unit or to tenants at the time they are admitted to a HTF unit; notice also provided with eviction from a HTF unit
- Must allow tenants who qualify to transfer to another HOME/HTF unit in same project if considered safe or may assist to move out of project into another HOME/HTF project
- May bifurcate lease to evict abuser and allow other family members to remain in the unit
- Grantees are required to adopt an emergency transfer plans





Knowledge Check



HTF Accounts



- HTF grantees are required to establish a separate HTF local interest-bearing account or a subsidiary account within its general fund;
- The local HTF account will include fund disbursements, program income, and any HTF repayments
- HTF funding requirements:
 - HTF not committed within 24 months will be recaptured by HUD
 - HTF not expended within 5 years after the execution of the HUD funding agreement will be recaptured
 - HTF will be subject to recapture for non-compliance; other actions include a freeze on future withdrawals or removal from HTF allocations or suspension





Program Disbursements and Information System



- After execution of a written agreement committing HTF the project will be set up in IDIS
- HTF are drawn from the Treasury account utilizing an electronic funds transfer to the local HTF account once the project setup has been completed; drawn funds must be disbursed prior to making additional requests for funds
- HTF drawn from the Treasury account must be disbursed before additional requests for HTF funds
- Projects can be amended to commit additional HTF within one year of the initial project commitment if the addition of more HTF does not exceed the maximum perunit development subsidy see 93.300





Program Income and Repayments



Program Income

- Program income (PI) generated by HTF projects retains its federal identity and must be used in compliance with all HTF requirements
- PI must be deposited in the local HTF account unless allowed to be held at the subrecipient level as detailed in the subrecipient agreement
- Grantees are required to report PI earned. PI must be used for another eligible HTF activity

Repayments

- Projects terminated prior to meet completion must be repaid to the HTF account
- Failure to complete the affordability term triggers repayment these funds are not considered PI but will be repaid based on HUD instructions to the local account or to the HTF Treasury account
- Repayments received by a grantee who is no longer a HTF grantee will be required to be repaid to HUD and reallocated.
- For additional guidance see HOME Facts Vol 7 #1 on repayments to the local account
- HOME Facts Vol 1 #1 provides instructions for repayment to the treasury account





Grantee Responsibilities



- Grantee is responsible for the day-to-day operation of the HTF program to ensure funds are used in compliance with the program requirements
- The use of subgrantees or contractors does not relieve the grantee of its responsibility
- If performance issues arise, the grantee is responsible for taking appropriate action to address the problem
- Grantee is required to have written policies and procedures
- Written agreements must be executed for all commitments of HTF
- Performance of contractors and subrecipients must be evaluated on an annual basis
- Grantees must establish a risk-based system for monitoring





Written Agreements



- Written agreement must be entered into <u>before</u> any HTF funds are committed or disbursed in IDIS
- Written agreements must be in place for subgrantees and eligible recipients
- Required content vary by organization type refer to 93.404(c) for lists of required provisions
- Grantee is required to have written policies and procedures for evaluating risk of activities along with systems to monitor
- The written agreement is a key document to establish requirements and may also link subgrantees and recipients to policies and procedures



Written Agreements Required Provisions 93.404(c)



- Use of HTF
- Deadlines
- Audit requirements
- Program income and 2 CFR Part 200
- Other program requirements
- Affirmative marketing
- Requests for disbursements
- Reversion of assets
- Records and reports

- Project requirements (e.g., affordability)
- Affirmative Marketing
- Enforcement of the agreement
- Written agreements
- Duration of agreement
- Fees





Onsite Inspections



- Grantees must perform onsite inspection at project completion and certify that the housing meets the property standards
- Grantee must establish inspection procedures to ensure HTF assisted housing meets the property standards of 93.301
- Ongoing Inspection Requirements:
 - Rental housing must remain in compliance with the ongoing property standards through the duration of the affordability period
 - Periodic onsite inspections beginning within 12 months after project completion and then at least every three years during the period of affordability
 - Grantees may establish a list of non-hazardous deficiencies that can be verified by a third party rather than require reinspection
 - Grantee will need to establish procedures to address any observed deficiencies of the grantee's inspectable items
 - Owners must annually certify property meets ongoing property standards





Financial Oversight



- Grantees must examine at least annually the financial status of HTF-assisted rental projects with 10 or more assisted units
- Review is conducted to determine continued viability of the project
- Grantees will need to document oversight and actions taken to correct problems
- Financial oversight must continue throughout the affordability period





Audits



- Audits of the grantee and all subgrantees in accordance with 2 CFR part 200, subpart F
- The following audit provisions are exempted for HTF funds
 - 200.307
 - 200.311
 - 300.328(b)
 - 200.329
 - 200.333
- If there is conflict between 2 CFR part 200 definitions and 24 CFR part 93 definitions, HTF will defer to part 93





Recordkeeping Requirements



Program	Project	Financial
 Written policies and procedures Subsidy Layering Guidelines Risk assessment Other Federal Requirements Displacement and Acquisition – URA Recapture Resale 	 Full project description Eligibility and allowability of costs Allocation of costs for mixed unit projects Per Unit Subsidy and Underwriting Inspection reports Affordability period compliance records First time homebuyer and housing counseling 	 Document compliance with 2 CFR Part 200 Audit reports Financial reports for HTF account Program Income Budgetary control





Record Retention Period



- All records must be retained for most recent 5-year period, except:
 - Rental Housing records must be retained for 5 years after the project completion date except tenant record, which only the most recent 5-year period is required to be held until 5 years after the end of the affordability period
 - Homeownership records must be retained for 5 years after project completion date except for resale/recapture documents, which must be retained for 5 years after the end of the affordability period
 - Written agreements must be held for 5 years after the termination of the agreement
 - Displacement/Acquisition documents must be retained for 5 years after final payments are issued for all persons
 - Records related to issues such as audits, litigation, or inspections must be maintained until the issue has been resolved or the end of the required retention period whichever is later

Record Access



- Access to Records
 - Grantees must provide reasonable public access to records in compliance with State and local laws regarding privacy and obligations of confidentiality
 - Records must be protected to ensure confidentiality
 - HUD has the right to access records during the retention period

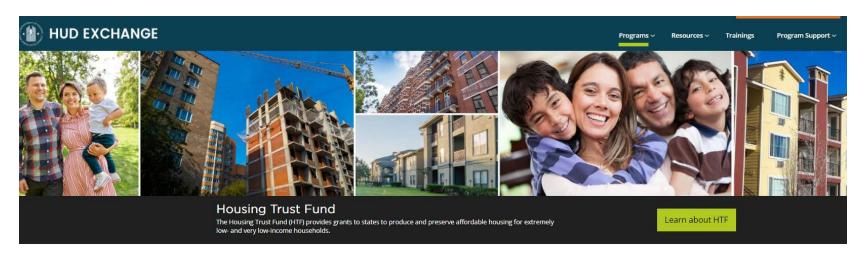




Resources



https://www.hudexchange.info/programs/htf/









Related Resources



- HTF Laws and Regulations
 https://www.hudexchange.info/programs/htf/laws-regulations/
- Income Calculator
 https://www.hudexchange.info/incomecalculator/
- <u>Using IDIS for HTF</u>
 https://www.hudexchange.info/trainings/idis-htf/
- Building HOME Online Training Series provides detailed training on recapture/resale, https://www.hudexchange.info/trainings/building-home/











