



# HOME Program Monitoring Series

## Session 5: Homebuyer Development Activities

Spring 2021



# Overview

# Presenters

**Monte Franke**

**Kris Richmond**



# HOME Monitoring Webinar Series Overview

	<b>Understanding Monitoring</b> April 13, 2021		
General Administration	<b>Program Oversight and Financial Management; Match</b> Exhibits: 7-25   7-33 April 15, 2021	<b>CHDO</b> Exhibit: 7-32 April 20, 2021	<b>Oversight of Program Partners &amp; Their Written Agreements</b> Exhibits: 7-34   7-35   7-36 April 22, 2021
Homeowner	<b>Homebuyer Development</b> Exhibit: 7-27 April 27, 2021	<b>Homebuyer Assistance</b> Exhibit: 7-28 May 4, 2021	<b>Homeowner Rehabilitation</b> Exhibit: 7-26 May 11, 2021
Rental	<b>Rental</b> Exhibit: 7-29 April 29, 2021	<b>TBRA</b> Exhibit: 7-31 May 6, 2021	<b>Long-Term Rental Compliance</b> Exhibit: 7-30 May 13, 2021



# Webinar Objectives

- Introduce the CPD Monitoring Guide Exhibit 7-27 & HUD monitoring of PJ homebuyer development activities
- Identify the policies & procedures required for ensuring compliance for homebuyer development activities
- Introduce program design considerations for homebuyer development
- Recommend steps to prepare for PJ self-assessment and HUD monitoring



# Homebuyer Development v. DPA

- Homebuyer Development addresses the acquisition, construction/ rehabilitation and resale of homebuyer units
  - These projects are addressed by this webinar and Exhibit 7-27
- If the PJ's homebuyer activity is only providing direct financing to buyers (DPA) without development, then Exhibit 7-28 will be used in monitoring and this will be covered in another webinar
- Note: some homebuyer activities involve both development assistance and direct buyer assistance, and may require the use of both Exhibits





# Regulatory Requirements

# Regulatory Provisions

## Key Regulatory Requirements

- §92.254(a) – Basic homebuyer requirements (price/value, resale/recapture)
- §92.254(c) – Definition of homeownership
- §92.254(f) – Required homebuyer program policies

### Additional project requirements:

- §92.203 – Income determinations
- §92.205-207 – Eligible and ineligible costs
- §92.217 – Income targeting: homeownership
- §92.250 – Subsidy limits, underwriting/subsidy layering
- §92.251 – Property standards

### Program administrative requirements:

- §92.254(e) – if assistance through other lenders
- §92.502 – IDIS set-up/disbursement
- §92.504 – Written agreements; on-site inspection
- §92.505 – Uniform admin requirements
- §92.508 – Recordkeeping





# Introduction to CPD Monitoring Exhibit 7-27

Exhibit 7-27  
HOME Program

6509.2 REV-7 CHG-1

<b>Guide for Review of Homebuyer Development and/or Rehabilitation Projects and/or Policies &amp; Procedures</b>	
<b>Participating Jurisdiction:</b> Click or tap here to enter text.	<b>Subrecipient:</b> Click or tap here to enter text.
<b>PJ Staff Consulted:</b> Click or tap here to enter text.	
<b>Name of HUD Reviewer(s):</b> Click or tap here to enter text.	<b>Date of Review:</b> Click or tap here to enter text.
<b>Type of Monitoring Review:</b>	<input type="checkbox"/> Project File Review <input type="checkbox"/> Policies & Procedures Review <input type="checkbox"/> Combined: Project <u>and</u> Policies & Procedures Review

**NOTE:** All questions contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance.



# Order of Discussion of Monitoring Topics

Regulatory Requirements				Program Design
Project Requirements	Project Underwriting & Financing	Buyer Qualification & Financing	Administration & Monitoring	Program Design & Operational Considerations
Property Requirements	Eligible/Reasonable Costs	Income Determination	Procurement/ Contractor Oversight	Project Selection
Property Standards	Subsidy Layering/ Cost Allocation/ Underwriting	Counseling	Project Completion	Developer Agreements
Ownership	Developer Agreement	Responsible lending	Record Retention	Property Standards
Affirmative Marketing	Commitment & Set-Up	Buyer Agreement		Sustainability



# How Much Experience Do You have Monitoring Homebuyer Development?

**A.** Less than 1 year

**B.** 1-5 years

**C.** 5+ years





# Monitoring of Homebuyer Development Project Requirements

# Discussion of Topic Areas

## Requirements

- Key regulatory requirements on which the Exhibit Questions are based

## Documentation

- Items that must be documented to demonstrate compliance, including both policies & procedures and file documentation

## Compliance Review

- Compliance determinations that go beyond basic file documentation (as needed)



# Requirements: Project Selection and Financing



# Property Requirements: Eligible Units

## Requirements

Homebuyer properties must be:

- **Single family housing:** 1-4 family residence, condo, cooperative unit, manufactured housing
- **Sale Price:** complies with Homeownership value limit
- **Sold to eligible buyer:** purchased or under agreement within 9 mos. or converted to rental
- **Environmental compliance:** including flood insurance (if applicable)

## Documentation

- Environmental review record
- Sales agreement/documentation (date, single family, price)



# Property Requirements: Property Standards

## Requirements

- PJ must ensure that all property standards addressed
  - New construction: state/local codes, disaster mitigation
  - Rehabilitation: PJ rehab standards, 5-yr useful life, LBP in pre-1978
  - Different standards for manufactured housing
- PJ inspections: Initial (for rehabilitation), progress, and final

## Documentation

- If rehab, PJ rehab standards
- Scope & contract documents
- Inspection records





# Ownership and Occupancy

## Requirements

- Ownership must meet the definition of “homeownership” in §92.2
- Fee simple title in a 1- to 4-unit dwelling or in a condominium unit, or equivalent form approved by HUD

## Documentation

- Eligible form of ownership documented (title/title policy, long-term lease, coop membership agreement, etc.)



# Lease Purchase (if applicable)

## Requirements

PJs may assist homebuyers through lease-purchase, subject to HOME requirements and deadlines to complete the purchase

- Household must be income eligible at time of lease execution
- Purchase must be completed within 36 mos.
- If not transferred in 42 mos., converted to rental

## Documentation

- If lease-purchase, approved activity (Action Plan) & PJ lease-purchase policy
- Written agreement, records of transfer or conversion



# Affirmative Marketing

## Requirements

Adopt affirmative marketing procedures to conduct outreach to those least likely to apply for projects of 5+ units

- HUD will use Exhibit 22-3 for monitoring affirmative marketing & civil rights

## Documentation

- PJ's affirmative marketing requirements and procedures
- Records of implementation of affirmative marketing strategies



# Requirements: Project Underwriting & Financing



# Project Selection & Financing

## Requirements

- Invest no more HOME funds than necessary to provide quality affordable housing that is financially viable for at least the period of affordability
  - HOME investment based on eligible/reasonable costs, underwriting, cost allocation
  - PJ must have project underwriting policies (92.250(b))
  - Eligible form of investment for development assistance
- Additional direct homebuyer assistance – determination if needed based on prices and expected/actual buyer income levels (92.254(f))
  - PJ must have homebuyer program policies, including buyer underwriting guidelines



# Eligible & Reasonable Cost

## Requirements

- Eligible costs: 92.206
  - Certain pre-development costs subject to 92.206(d)(1)
- Ineligible costs/fees: 92.214
- All costs must be reasonable: 2 CFR 200.404

## Documentation

- Final project budget/sources and uses
- Reasonableness determination: cost estimates, market pricing or competitive bids
- Source and application of all project funds

## Compliance Review

- Costs paid were HOME eligible
  - Including costs incurred prior to commitment
- All costs were determined reasonable



# Subsidy Limits & Cost Allocation

## Requirement

- Assisted units subject to minimum (\$1000) & maximum subsidy limits
- If mixed-use/ income property (< 100% HOME assisted), eligible costs must be allocated to the assisted units

## Documentation

- Development budget (sources & uses)
- Written agreement specifying assisted units
- Copy of PJ's cost allocation analysis

## Compliance Review

- Only eligible costs were allocated to HOME units
- If proration of costs, units determined to be comparable



# HOME Subsidy

## Requirement

- Invest no more than is necessary for project viability & reasonable return
- Minimum subsidy/unit - \$1,000 per assisted unit
- Maximum subsidy - applicable maximum per unit subsidy
- Eligible form of investment

## Documentation

- Completed underwriting/subsidy layering analysis & cost allocation
- Written agreement & legal documents indicating amount/form of HOME subsidy





# Project Underwriting

## Requirement

- Prior to commitment, PJ must underwrite project and determine:
  - Sources & uses
    - Costs are reasonable
    - Firm commitments for all sources
  - Market demand is sufficient
  - Developer experience and financial capacity are adequate
- Subsidy layering if other public sources

## Documentation

- Completed underwriting/subsidy layering analysis:
  - Market analysis & conclusion
  - Developer experience & financial capacity review
  - Cost review
  - Sources firmly committed
- Subsidy layering: all public sources considered



# Owner/Developer Written Agreement

## Requirements

Written agreement must:

- Identify the terms of the HOME investment
- Enumerate all HOME & project requirements
- Contain sufficient detail for PJs to monitor

## Documentation

- Executed written agreement & amendments, if any (signed and dated by PJ & developer) containing all requirements (92.504(c))



# Owner/Developer Written Agreement (cont.)

## Compliance Review

Agreement contains all required administrative & project provisions:

### Administrative Provisions

- Agreement executed before disbursement and in file
- Agreement has required detail
- Agreement in effect through completion and sale
- Repayment if fail to meet POA
- Records/reports
- Remedies for breach

### Project Provisions

- Resale/recapture provisions
- Subpart F requirements
- Property standard(s)
- Affirmative marketing & nondiscrimination
- Relocation and/or Davis-Bason
- Conflict of interest
- Parment of eligible costs
- Prohibited fees
- CHDO provisions (if appl.)



# Project Commitment and Set-Up

## Requirements

Commitment requires an executed HOME written agreement with the project owner/developer for a project that complies with environmental review requirements and for which:

- All necessary financing has been secured
- A budget and schedule have been established
- Underwriting analysis complete
  - Sources and uses; costs reasonable; market demand assessed, developer experience and financial capacity determined adequate; firm commitments for all sources
- Construction is scheduled to start within 12 months



# Project Commitment and Set-Up (cont.)

## Documentation

- Underwriting analysis (sources & uses, eligible/reasonable costs, firm commitments, market analysis, developer capacity)
- Environmental review - clearance
- Signed & dated written agreement

## Compliance Review

- Environmental review & full underwriting completed & written agreement executed prior to IDIS set-up



# Requirements: Buyer Requirements & Financing



# Buyer Requirements - Income Determination

## Requirement

- Using 1 of 2 income definitions
- 2 months source documentation
- Buyer HH annual income projected
- Meeting applicable LI limit
- Determined no more than 6 months before assistance

## Compliance Review

- For all buyers, PJ P&Ps consistently followed & 1 definition used

## Documentation

- PJ P&Ps for income determination
- Determination (calculation) buyer income meets applicable LI limit
- 2 months source documentation
  - E.g., pay stubs, unemployment compensation statements, letter from another income-based program, account statements, etc.



# Buyer Requirements - Housing Counseling

## Requirement

The buyer must receive counseling, in compliance with HUD counseling standards at 24 CFR 5.100 by a HUD-certified counselor

- See CPD-18-9 Section V for counseling policy provisions
- Housing Counseling Rule, August 2021

## Documentation

- PJ buyer counseling policy requiring HUD-certified counselor prior to purchase
- Counseling certificate that buyer received counseling from a HUD-certified counselor





# Responsible Lending Requirements

## Requirement

Homebuyer mortgage must meet PJ's responsible lending policies & ownership must be sustainable (see 92.254(f) & CPD-18-09)

## Documentation

- PJ homebuyer program policies
- Buyer underwriting
  - Meets PJ policies & supports conclusion that ownership is sustainable & senior loan has no risky loan features



# Lender Requirements

## Requirements

- If lender administers DPA, must meet requirements of 92.254(e)
  - Written agreement w/ terms of funding
  - Lender charges reasonable fees, & no fees to buyer on HOME assistance
  - PJ must verify buyer income eligibility & inspect the units

## Documentation

- If applicable, lender agreement
- PJ eligibility verification & unit inspection
- Closing Disclosure form (HUD-1)



# Homebuyer Written Agreement

## Requirements

PJ (or state recipient/subrecipient) must execute a written agreement with each homebuyer which specifies:

- 92.254(a) requirements for price, principal residency, resale/recapture, period of affordability
- Amount and form of assistance
- Time by which housing must be acquired
- Remedies for not meeting principal residency
- Refinancing guidelines

## Documentation

Executed agreement in file

- Containing all required provisions
- Dated and signed by PJ and buyer



# Resale and Recapture Requirements

## Requirements

Must meet program affordability requirements for a specific period of time, and subject to resale/recapture requirements if sold

- PJ must identify its resale and/or recapture provisions in its Consolidated/Annual Plan
- HUD must approve the resale and/or recapture provisions
- Resale or recapture restrictions are imposed thru the written agreement with the homebuyer, and enforced via lien, deed restrictions, or covenants running with the land



# Resale and Recapture Requirements (cont.)

## Documentation

- Written agreement (complying with approved resale/recapture provisions)
  - Correct period of affordability
  - Resale/recapture provisions
- Deed covenant (resale) or note/mortgage (recapture)
  - If subject to resale, imposed thru deed restrictions
- If resold, provisions enforced and (if recapture) funds recaptured

## Compliance Review

- Resale/recapture consistent with Annual Plan & HUD approved



# Requirements: Administration and Monitoring



# Procurement and Contractor Oversight

## Requirements

If the PJ (or state recipient or subrecipient) is the developer, federal procurement rules at 2 CFR Part 200 Subpart D (updated August 2020)

- HUD will use Exhibit 34-3a to review the procurement

## Documentation

If PJ (or state recipient, subrecipient) conducts procurement, procurement files



# Project Completion

## Requirements

HOME projects must be completed within 4 years of commitment and sold or under ratified sales contract within 9 mos. of construction completion

- Project completion means work is completed, project meets property standards, all funds drawn, and completed in IDIS

## Documentation

- IDIS completion - within 4 years of commitment & 120 days of final draw
  - If not completed in 4 years, extension approved by HUD
- Contract/sale documents - within 9 months of completion (final inspection/occupancy permit)





# Record Retention

## Requirements

- Homebuyer project records must be retained for 5 years after *project completion*
- Written agreement & recapture/resale documents must be retained for 5 years after the *affordability period terminates*

## Documentation

- Project records retained 5 years after completion
- Resale/recapture documents retained 5 years after period of affordability
- Written agreements retained 5 years after termination



# Which of These Records do NOT Need to be in the PJ's Project Files for Homebuyer Program?

**A.** Homebuyer's application, with household size and income

**B.** Homebuyer's IRS tax return for last three years

**C.** Copy of deed restriction for a resale project

**D.** Written agreement between the PJ and the project developer





# Program Design Considerations: Enhancing Homebuyer Development Activities

# Key Considerations

- Are your homebuyer activities achieving the objectives that you set in your Consolidated Plan?
- Are you selecting the right project & is your underwriting resulting in projects that are more sustainable?
- Are you able to use your developer agreements to monitor and enforce requirements?
- Are you producing the quality of homebuyer units that you want?
- Is buyer financing affordable and ensuring sustainability?
- Are your resale/recapture provisions appropriate for the current market?



# Program Objectives

## What are you trying to achieve with homebuyer activities?

- Are you trying to increase homeownership among certain types of households?
- If you have a target group, are they being served effectively?  
OR
- Are you targeting certain neighborhoods or areas to stabilize or increase ownership?
- Are you achieving the desired program outcome?



# Project Selection

## Has your selection & underwriting resulted in sustainable projects?

- Is there a sufficient pool of potential projects & developers to choose from?
- Has your market analysis helped to minimize unsold units?
- Has your analysis of developer capacity been adequate to avoid performance issues?
- Has your project underwriting resulted in sustainable ownership?



# Developer Agreements

- Do your written agreements clearly state all requirements, including local requirements?
- Do you record legal documents during the development period to protect PJ interests in the event the developer fails?
- Do you have authority to effectively monitor performance & compliance?
- Do agreements provide for verification of use of HOME funds?
- Do you have adequate control over reporting/disposition of net proceeds (CHDO proceeds or program income)?



# Property Standards & Housing Quality

- Cost Review – Are your cost review procedures and bidding requirements on developers sufficient to ensure reasonable costs?
- Property Standards – Are your property standards sufficient to ensure the properties are sustainable by the buyers for at least the affordability period?
  - If rehab, are useful life standards sufficient?
- Inspections – Is your monitoring and the frequency of progress inspections sufficient to ensure the work meets requirements?





# Homebuyer Program Policies

## Counseling

- Is your counseling effective in helping to ensure homeownership sustainability?

## Buyer Underwriting and Responsible Lending

- Are your homebuyer underwriting standards helping to ensure sustainable ownership?
- Are your responsible lending policies ensuring that your buyers are obtaining reasonable and appropriate 1<sup>st</sup> mortgages?

## Refinancing

- Is your refinancing policy addressing all requests, ensuring fair treatment of owners, and protecting the HOME investment?



# Resale/Recapture

- Do you have adequate control over sales?
  - Are the legal documents being recorded (and stored for the POA)?
  - Are you monitoring principal residency during the affordability period?
  - Are you being notified when HOME units under a POA are being sold?
- Are your resale/recapture achieving what you want?
  - Are your resale/recapture provisions having the intended effect of preserving affordability?
  - Are they appropriate to current market conditions?





# Preparing for HUD Monitoring

# Homebuyer Development and/or Rehabilitation Projects: Exhibit 7-27

Exhibit 7-27  
HOME Program

6509.2 REV-7 CHG-1

<b>Guide for Review of Homebuyer Development and/or Rehabilitation Projects and/or Policies &amp; Procedures</b>	
<b>Participating Jurisdiction:</b> Click or tap here to enter text.	<b>Subrecipient:</b> Click or tap here to enter text.
<b>PJ Staff Consulted:</b> Click or tap here to enter text.	
<b>Name of HUD Reviewer(s):</b> Click or tap here to enter text.	<b>Date of Review:</b> Click or tap here to enter text.
<b>Type of Monitoring Review:</b>	<input type="checkbox"/> Project File Review <input type="checkbox"/> Policies & Procedures Review <input type="checkbox"/> Combined: Project <u>and</u> Policies & Procedures Review

**NOTE:** All questions contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance.



# Preparing for HUD: Document Assembly

## Document Assembly

- Homebuyer P&Ps
- Program applications & marketing materials
- Written Agreement Template
- Resale or recapture provisions
- Underwriting guidelines
- Rehab standards
- IDIS reports
- HOME limits (income, max subsidy, max purchase price,
- Past monitoring
- Citizen input
- Monitoring Exhibit 7-27

**Self-  
assessment**

**HUD  
Monitoring**



# Preparing for HUD: Self-Assessment

**Document  
Assembly**

## **Self-assessment**

- P&Ps review
- Documentation review
- Monitoring questions review

**HUD  
Monitoring**



# Pre-monitoring Self-assessment

## Regulatory Compliance

- Policies and procedures
- Written agreements and docs
- Regulatory limits and requirements
- Eligibility documentation

## Program Performance

- Program status (IDIS)
- Production vs. ConPlan goals

## Monitoring & Evaluation

- PJ monitoring
- Response to prior monitoring
- Citizen comments/media
- Staff skills/training
- Changes to program

<https://files.hudexchange.info/course-content/home-monitoring-webinar-series-understanding-monitoring/HOME-Monitoring-PJ-Self-Assessment-Handout.pdf>





# Resources & Tools



# CPD Monitoring Handbook

<b>CHAPTER 7: HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)</b>	<b>WORD</b>
<b>Optional Attachments 7-0 (4 files), Exhibits 7-1 through 7-23, and Attachment 7-1 – (REMOVED)</b>	
<b>Exhibit 7-24 - HOME Pre-Monitoring Checklist</b>	<b>WORD</b>
<b>Exhibit 7-25 - Guide for Review of Program Oversight, Financial Management, and Cost Allowability</b>	<b>WORD</b>
<b>Exhibit 7-26 - Guide for Review of Homeowner Rehabilitation Projects and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-27 - Guide for Review of Homebuyer Development and/or Rehabilitation Projects and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-28 - Guide for Review of Homebuyer Downpayment Assistance Projects and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-29 - Guide for Review of Rental Development or Rehabilitation Projects and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-30 - Guide for Review of Rental Project Compliance and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-31 - Guide for Review of Tenant-Based Rental Assistance (TBRA) Projects and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-32 - Guide for Review of Community Housing Development Organization (CHDO) Qualifications, Projects, and/or Policies &amp; Procedures</b>	<b>WORD</b>
<b>Exhibit 7-33 - Guide for Review of Match Requirements</b>	<b>WORD</b>
<b>Exhibit 7-34 - Guide for Review of Contractor Written Agreements</b>	<b>WORD</b>
<b>Exhibit 7-35 - Guide for Review of State Recipient Written Agreements and Oversight</b>	<b>WORD</b>
<b>Exhibit 7-36 - Guide for Review of Subrecipient Written Agreements and Oversight</b>	<b>WORD</b>

[https://www.hud.gov/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2)



# HUD Exchange HOME Page – Homeownership Topic

## HOME Topics



## HOME Homeownership

HOME Investment Partnerships Program (HOME) assistance can be provided to eligible homebuyers for acquisition only, acquisition/rehabilitation or new construction of homes. All HOME funds used for homeownership assistance must benefit homeowners whose family income does not exceed 80 percent of the area median income. In addition, the assistance must meet the following requirements:

- The assisted housing must be the owner's principal residence.
- The estimated value of the property must not exceed 95 percent of the median area purchase price.
- The Participating Jurisdiction (PJ) must establish resale provisions that safeguard the property's continued affordability or recapture all or part of the HOME subsidy invested.

PJs can structure the form of financial assistance for homebuyer activities according to the particular needs of the program's target participants. Generally, the form of assistance will include grants, deferred-payment loans, below-market-rate loans, or loan guarantees.

For more information on homeownership, see [24 CFR 92.254](#).

### Find by Resource Type

[Policy Guidance and FAQs](#)

[Guidebooks and Tools](#)

[Videos and Training Material](#)

### Policy Guidance and FAQs

#### FAQs

[Homebuyer Assistance FAQs](#)

[View Homebuyer Assistance FAQs.](#)

#### Program Limits



# Building HOME Online Training

## Building HOME Online Training

New to the HOME Investment Partnerships (HOME) Program? Experienced and want to deepen your knowledge of HOME requirements? This is the right training for you. Let's get started!

TRAINING DETAILS & INSTRUCTIONS

QUICK VIDEO TOUR



Engaging, self-paced training when you need it



Foundational training for government, nonprofit, for profit, and property management staff



Guidance including notices, HOMEfires, and guides



Challenge questions and exams to test your understanding of the requirements

## Module 5



## Homebuyer Programs

<https://www.hudexchange.info/trainings/building-home/>



# Other Tools Available

CPD-12-003: Guidance on Resale and Recapture Provision Requirements under the HOME Program  
<https://www.hudexchange.info/resource/2690/notice-cpd-12-003-guidance-resale-recapture-home/>

CPD-18-09: Requirements for HOME Homebuyer Program Policies and Procedures  
<https://www.hudexchange.info/resource/5742/notice-cpd1809-requirements-for-home-homebuyer-program-policies-and-procedures/>

Self-Assessment Tool: <https://files.hudexchange.info/course-content/home-monitoring-webinar-series-understanding-monitoring/HOME-Monitoring-PJ-Self-Assessment-Handout.pdf>

Property Standards Tool: <https://files.hudexchange.info/course-content/home-monitoring-webinar-series-chdos/HOME-Monitoring-Property-Standards-Handout.pdf>

Need technical assistance to prepare for HUD monitoring? [Request TA on the HUD Exchange.](#)





# Wrap-Up

# Questions?





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