



# HOME Program Monitoring Series

## Session 10: Long-Term Rental Compliance

Spring 2021



# Overview

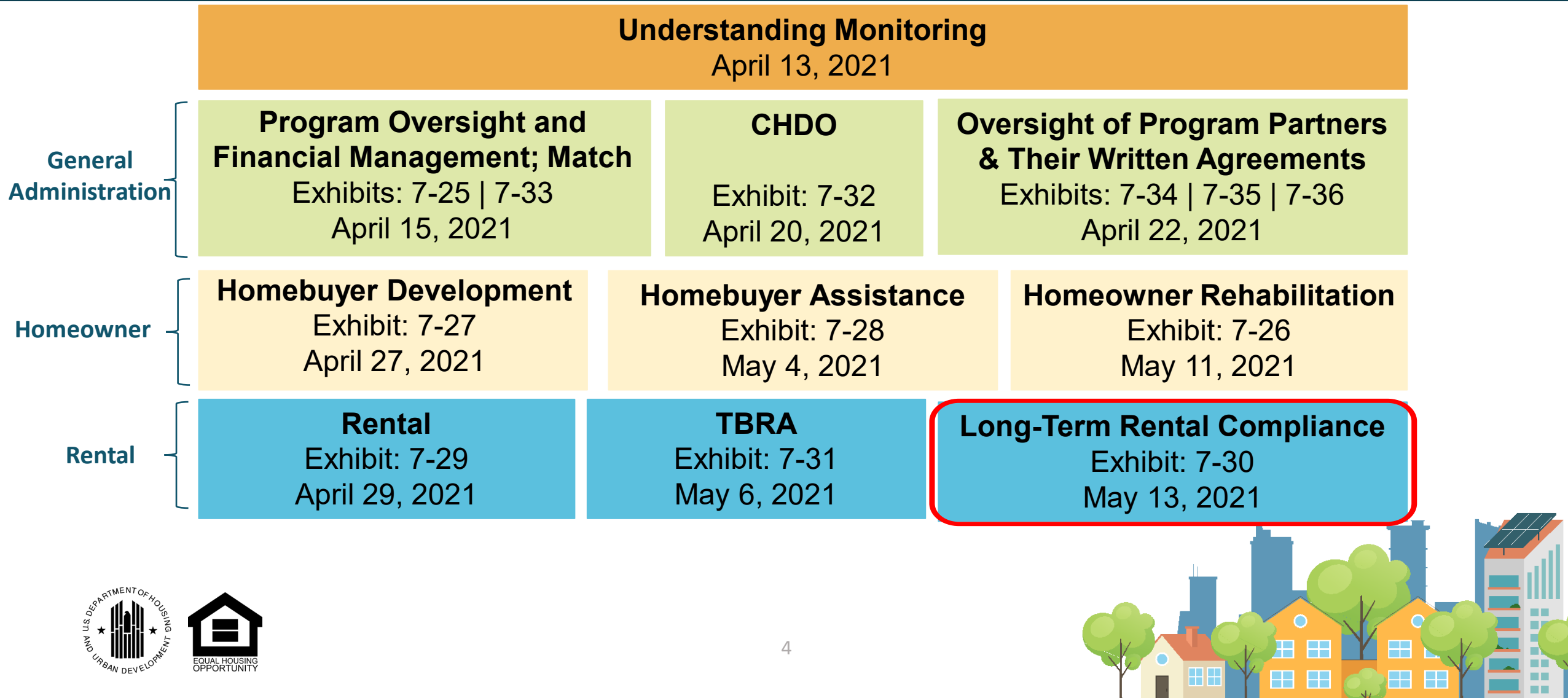
# Presenters

**Kris Richmond**

**Les Warner**



# HOME Monitoring Webinar Series Overview



# Webinar Objectives

- Introduce applicable regulations and CPD Monitoring Handbook Exhibit 7-30
- Identify HOME rental requirements that apply during POA & required file documentation
- Introduce optional steps PJ can take to enhance compliance
- Recommend steps to prepare for PJ self-assessment and HUD monitoring



# For How Long Have You Worked on Long-Term Rental Compliance?

**A.** Less than 1 year

**B.** 1-5 years

**C.** 5+ years





# Regulatory Requirements

# Regulatory Provisions

## Key long-term rental housing requirements

- Affordability / Rental requirements – § 92.252
  - Rents
  - Income targeting
  - Affordability period
- Tenant protections – § 92.253
- Income eligibility & determinations – § 92.203
- Ongoing property conditions standards – § 92.251(f)

## Other HOME Requirements

- Affirmative marketing – § 92.351(a)
- Inspections and financial oversight – § 92.504(d)
- Permitted fees – § 92.214(b)
- Records retention – § 92.508(c)(1)



# Intro to CPD Monitoring Handbook Exhibit 7-30

## *Guide for Review of Rental Project Compliance and/or Policies & Procedures*

Guide for Review of Rental Project Compliance and/or Policies & Procedures	
<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>Project Owner:</b> Click or tap here to enter text.	<b>Project Address:</b> Click or tap here to enter text.
<b>Period of affordability:</b> Click or tap here to enter text.	<b>Number of HOME-assisted Units:</b> <b>Fixed or Floating:</b> <input type="checkbox"/> Fixed <input type="checkbox"/> Floating
<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 or regulation). If the requirement is not met, HUD must make a finding of noncompliance.



# Key Policies and Procedures

Regulatory				PJ Considerations
Project Completion & Lease-Up	Occupancy & Maintaining Unit Mix	Property Standards & Condition	Administration	PJ Operational Decisions
Completion Information	Income Determination	Property Standards	Procurement	Enhancing Long-Term Viability
18-Month Occupancy	Rents	Inspections	Permitted Fees	Administrative structure(s)
Affirmative Marketing		Financial Condition	Records Retention	
Tenant Selection				
Lease Compliance				





# Monitoring Long-Term Rental Housing Requirements

# Who Is Responsible for Monitoring Long-Term Compliance?

- PJ (or partner) must monitor compliance for every property in PJ's portfolio
  - Contractor (must be competitively procured per Federal rules)
  - State recipient
  - Subrecipient
- If a partner is responsible for long-term compliance, the PJ must oversee that partner

See **Exhibits 7-34, 7-35 & 7-36** for Oversight of contractors, state recipients or subrecipients, and related webinar.



# 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 Completion and Lease-up

**Project  
Completion  
and Lease-up**

**Ongoing  
Occupancy**

**Property  
Standards &  
Condition**

**Administration**



# Project Completion

## Requirement

PJ must enter project completion data into IDIS within 120 days of final project draw

## Documentation

Dated final inspection and/or certificate of occupancy -- *shows that project met the definition of project completion*

## Compliance Review

- Project completion was timely (within 120 days)
- Data in IDIS matches info in written agreement and project files for *activity type, property type, # units and HOME units, LBP (rehab only), Section 3 labor hours (if applicable), HOME unit # and # BRs, HOME costs & beneficiary data*



# 18-Month Occupancy

## Requirement

HOME-assisted units must be rented to eligible tenants no later than 18 mos. after project completion

- PJ must enter beneficiary data into IDIS w/in 18 mos.
- PJ must repay HOME funds invested in any vacant units

## Documentation

- Documentation to show full occupancy
  - E.g., owner report on beneficiaries, including unit numbers, unit size, household size, racial/demographic information; occupancy data input into IDIS
- Evidence of repayment of HOME costs for any units that were not occupied w/in 18 mos. of completion



# Affirmative Marketing

## Requirement

Owner must follow PJ's affirmative marketing policy, for projects with 5+ HOME units

## Documentation

Evidence of all outreach activities (ads, flyers, social media activity)

## Compliance Review

Outreach was conducted to those least likely to apply, per PJ's policy as conveyed in written agreement



# Tenant Selection Policies and Criteria

## Requirements

- Project owner must have written tenant selection policies and criteria that meet HOME requirements
- Policy must describe:
  - Who can rent units (income restrictions, special populations, nondiscrimination against those with rental assistance)
  - VAWA protections
  - Use of waiting list and applicant notification of reasons for rejection



# Tenant Selection Policies and Criteria (cont.)

## Requirements (cont.)

- Tenant selection policy & criteria must include the following, per 92.253(d)
  - Occupancy is limited to very low- and low-income households
  - Description of preferences to particular population(s), if any
    - Must also be in PJ's Con Plan and written agreement
  - No exclusion of applicants who hold rental assistance certificate or voucher
  - Required use of waiting list and selection of tenants in chronological order of application, to extent possible
  - Owners must give prompt written notice to rejected applicants, with the reason
  - Compliance with VAWA protections per 92.359



# Tenant Selection Policies and Criteria (cont.)

## Documentation

- Copy of tenant selection policy for the project – *must address required elements*
- Tenant files and rejected applications – *must show compliance with selection policy*
- Written agreement and Con Plan must describe any preference to particular populations, if applicable



# Lease Compliance

## Requirement

There must be a lease between owner and tenant, and it must:

- Be for at least one year; shorter term by mutual written agreement
- Include VAWA lease addendum, if HOME commitment made to project after 12/16/2016
- Must NOT contain prohibited lease terms per 92.253(b)

## Documentation

Lease in tenant files – *must show compliance with above requirements*



# Requirements: Occupancy & Maintaining Unit Mix



# Initial Income Eligibility Determination

## Requirement

- For initial leasing, owner determines tenant income eligibility
  - Use HOME income limits applicable at time
  - Use PJ-specified definition of income (Part 5 or IRS 1040)
  - Review at least 2 mos. of source documentation
  - Count income for all household members
  - Project household's prevailing rate of income for the next 12 mos.
- Determination - no more than 6 mos. before signing lease
- Same definition of income for all tenants in project



# Initial Income Eligibility Determination (cont.)

## Documentation

- Copy of PJ's income determination -- *must show household qualified as low-income per tenant file*
- Tenant's application/worksheet reporting household members & income
- Source documents (pay stubs, etc.) – *must show that PJ verified income*

## Compliance Review

- For each tenant file, owner documents compliance with all requirements
- For all tenants in project, owner uses same definition of income



# Annual Income Recertification

## Requirement

- During the POA, owner must annually recertify tenant household income
- Owner must use one of these methods:
  - At least 2 months source documentation
  - Family self-certification
  - From government program administrator of program with income test, statement that family receives benefits and is income-eligible
- If owner uses a self-certification or government program statement, owner must verify income with at least 2 mos. of source documentation every 6<sup>th</sup> year of POA, *if POA > 10 years*
- Use PJ-specified definition of income (Part 5 or IRS 1040)



# Annual Income Recertification (cont.)

## Documentation

- In each tenant file during subsequent years after initial occupancy:
  - Copy of self-certification, government program statement or source documentation that shows tenant was income-eligible based on HOME income limits in effect at the time
  - For properties with POA > 10 yrs, source documentation every 6th year

## Compliance Review

- Owner must determine household income accurately and compare to correct HOME income limits
- Tenant file information must be consistent with owner's annual reports for rent and occupancy
- Tenant's continued income-eligibility must be based on HOME income limits in effect at the time of the redetermination



# Initial Rents and Rent Schedule

## Requirements

- Rents cannot exceed the high HOME rent limit
- In projects with 5+ HOME units, 20% of HOME units must charge rent that cannot exceed low HOME rent limit
- If tenant pays for utilities and/or services:
  - Owner must deduct a utility allowance from HOME rent limit to determine maximum rent
  - Owner uses PJ's utility allowances -- based on HUD Utility Schedule Model or another model that is based on type of utilities at the project
- PJ must review and approve the initial project rents



# Initial Rents and Rent Schedule (cont.)

## Documentation

- PJ approval of initial rent schedule
- Tenant leases
- PJ's utility allowance schedule

## Compliance Review

- Determination that rent stated in lease is HOME compliant
- Reported rents (on approved rent schedule & rent and occupancy report) = rents specified in leases
- If tenant paid utilities, determination that owner correctly deducted utility allowance when determining maximum rent
  - Rent charged to tenant  $\leq$  HOME rent – Utility allowance



# Subsequent Rents

## Requirements

- PJ must provide updated rent limits and utility allowances to owner, annually
- Owner must submit annual rent & occupancy report
- Annually, PJ must review and approve the project rents
- Owner must charge the correct HOME rents
  - Generally, rents cannot exceed high or low HOME rents, for unit designation
  - If tenant pays utilities, owner must deduct utility allowance to determine max. rent
    - Maximum rent = applicable HOME rent minus utility allowance
  - If tenant's income is above the income limit for the unit, rent must be adjusted



# Subsequent Rents (cont.)

## Documentation

- Copy of applicable utility allowance schedule and rent limits
- Tenant leases
- Owner rent & occupancy report
- Annual rent schedule – *evidence of PJ review & approval*

## Compliance Review

- Rent stated in lease is HOME compliant
  - Rent charged to tenant  $\leq$  HOME rent – Utility allowance (if tenant pays utilities)
  - Owner used correct rent limits, utility allowances & calculated correctly
- Rents on rent & occupancy report = rents specified in leases



# Maintaining Required Unit Mix

## Requirements

- Low HOME units must be rented (and re-rented upon vacancy) to very low-income households (at or below 50% of AMI)
- For all HOME units, owner must adjust tenant's rent if their income increases above 80% of AMI

<b>Fixed HOME units</b>	Tenant pays lesser of 30% of the tenant's adjusted income <b>or</b> amount payable under state/local law
<b>Floating units</b>	Tenant pays lesser of 30% of adjusted income <b>or</b> amount payable under state/local law, capped at market rent; <b>and</b> owner must lease next available, comparable unit to a HOME-eligible tenant

**Note:** Over-income definition is different for LIHTC projects and HOME applies LIHTC definition



# Maintaining Required Unit Mix (cont.)

## Documentation

- Tenant leases
- Property's rent roll

## Compliance Review

- Vacated units were rented to income-eligible tenants, for unit type (high or low HOME unit)
- Rents were properly adjusted for any tenant whose income increased above low-income limit
- Rents in leases = Rents in annual rent/occupancy report from owner



# Requirements: Property Standards and Condition



# Ongoing Property Standards

## Requirements

- PJ must adopt property condition standards that apply throughout POA; must include:
  - State & local codes or PJ-developed ongoing property standards based on HUD's UPCS inspectable items and areas
  - Health and safety standards that address life-threatening deficiencies
  - Ongoing lead-based paint maintenance rules per 24 CFR 35.935, if applicable
- Owner must maintain HOME units to meet PJ standard & certify that property is in habitable condition annually

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



# Ongoing Property Standards (cont.)

## Requirements (cont.)

- PJ must inspect property to determine that project meets ongoing property conditions standards
  - Within 12 mos. of project completion
  - At least every 3 years during POA – more frequently if complaints
- PJ must inspect sample size (number of units) appropriate for property size
  - 1-4 units = 100%
  - For each building with HOME units: Inspections of inspectable items (site, building exterior, building systems, and common areas)



# Ongoing Property Standards (cont.)

## Requirements (cont.)

- If inspection identifies deficiencies
  - Re-inspection w/i 12 mos to verify deficiencies were corrected
  - For health & safety deficiencies, immediate correction & more frequent inspections
  - For non-hazardous deficiencies, PJ can use third party docs (e.g., invoices) to verify



# Ongoing Property Standards (cont.)

## Documentation

- Inspection reports
- If deficiencies found, re-inspection report(s), or other documentation for non-hazardous deficiencies
- Owner's annual certification that units are suitable for occupancy

## Compliance Review

- Inspection shows property meets applicable standards; if found, deficiencies are corrected per requirements
- Inspection dated w/in 12 mos of completion & at least every 3 yrs during POA



# Financial Condition

## Requirement

- For projects with 10+ units, PJ must assess project's financial condition annually

## Documentation

- Owner's annual financial report (described in the written agreement)
- PJ's assessment of property's financial condition

## Compliance Review

- Determine the continued financial viability of the project; take steps to intervene when there are signs of trouble



# Requirements: Administration



# Procurement

## Requirement

- PJ must follow Federal procurement requirements for selection of contractor, per 2 CFR part 200

## Documentation

- Documentation of bid process, bid solicitation & bids received
- PJ's justification for selection

Exhibits 7-34 and 34-3 cover procurement



# Permitted Fees

## Requirement

- PJ can charge annual compliance monitoring fee, if in underwriting & based on actual cost
- Owner can charge certain fees, including:
  - Reasonable application fees and other fees if customary for area
  - Fees for services, if services are optional and tenant opts in

## Documentation

- If PJ charged monitoring fees, PJ's underwriting and analysis that established the basis
- If owner charged fees, documentation that they are customary, eligible & reasonable



# Records Retention

## Requirement

- Required records retention periods
  - Rental project records - 5 years after project completion
  - Tenant income verifications, project rents and inspection records - For most recent 5-year period until 5 years after end of POA
  - Written agreement - For 5 years after it terminates (5 years after the end of the affordability period)

## Documentation

Applicable records are available for required period



# During the affordability period, can a tenant's rent exceed the HOME rent limit? If so, when?

**A.** No, never

**B.** Yes, after the tenant has lived in the HOME-assisted unit for more than two years

**C.** Yes, the rent must be adjusted when/if the tenant's income increases over 80% AMI





# PJ Considerations for Long-term Rental Compliance

# A Quick Recap

- Discussed so far:
  - Policies related to risk assessment, monitoring, and inspections
  - On-site monitoring
  - Desk monitoring of owners' annual reports
- Next - discuss practices to enhance required long-term monitoring
  - Purpose: To identify property(ies) that may be in trouble and intervene before they fail



# When To Take Additional Steps

- Be strategic! Take additional steps when there's a concern.  
Examples:
  - Owner financial report shows increasing vacancies and declining revenue
  - Staff hears of huge layoffs at a local employer near a HOME property
- Be proactive! Early intervention gives PJ best protection to mitigate or eliminate serious issues



# Additional Practices to Enhance Monitoring

- Assess property management staff expertise and experience managing affordable housing
- Increase frequency of owner reporting
- Increase onsite inspections
- Take “pulse” of the neighborhood changes that may affect marketability
- Conduct drive-by inspections of properties in portfolio for physical signs of property health – continued landscaping, property maintenance



# Administrative Issues

- Policies and procedures
  - Risk assessment and monitoring plans must reflect long-term monitoring goals and objectives
- Administrative structure / Staffing
  - Effective hand-off between staff at project completion
  - Sufficient for required number of on-site visits
  - Expertise with property standards (inspectors)
  - Expertise with HOME requirements for file reviews (program staff)
- Good communication between PJ and owner
  - Strong partnerships help keep property viable





# Preparing for HUD Monitoring

# CPD Monitoring Handbook, Exhibit 7-30

Guide for Review of Rental Project Compliance and/or Policies & Procedures	
<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>Project Owner:</b> Click or tap here to enter text.	<b>Project Address:</b> Click or tap here to enter text.
<b>Period of affordability:</b> Click or tap here to enter text.	<b>Number of HOME-assisted Units:</b> <b>Fixed or Floating:</b> <input type="checkbox"/> Fixed <input type="checkbox"/> Floating
<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 or regulation). If the requirement is not met, HUD must make a finding of noncompliance.



# Preparing for HUD: Document Assembly

## Document Assembly

- Program-wide P&P for
  - Rental program
  - Inspection policy & schedule
- Project specific P&P for
  - Marketing/affirmative marketing
  - Tenant selection
- Written agreements
- Eligibility docs (rent & income limits)
- Owner reports (rents, habitability, financial)
- Past monitoring results
- Citizen input
- Exhibits 7-24 and 7-30

**Self-  
assessment**

**HUD  
Monitoring**



# Preparing for HUD: Self-Assessment

**Document  
Assembly**

## **Self-assessment**

- P&Ps review
- Documentation review
- Exhibit 7-30 Monitoring questions

**HUD  
Monitoring**



# Pre-monitoring Self-assessment

## Regulatory Compliance

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

## 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 and Tools

# CPD Monitoring Handbook

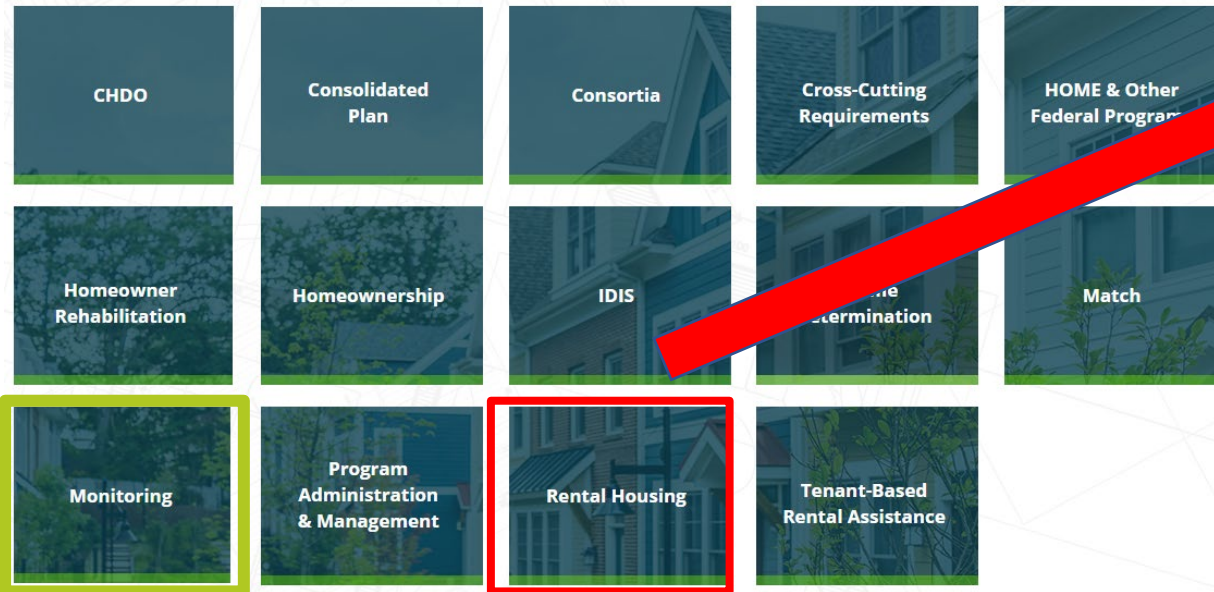
<b>CHAPTER 7: HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)</b>	<b>WORD</b>
<b>Optional Attachments 7-0 (4 files), Exhibits 7-1 through 7-23, and Attachment 7-1 – (REMOVED)</b>	
<b>Exhibit 7-24 - HOME Pre-Monitoring Checklist</b>	<b>WORD</b>
<b>Exhibit 7-25 - Guide for Review of Program Oversight, Financial 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 – Rental Topic

## HOME Topics



## HOME Rental Housing

HOME Investment Partnerships Program (HOME) funds may be used for the acquisition, new construction, or rehabilitation of affordable rental housing. HOME-assisted rental units must be occupied by income eligible tenants, and carry rent and occupancy restrictions for varying lengths of time depending upon the amount of HOME funds invested per unit. Included in this topic area is information about program design issues, subsidy layering, lease terms, calculating rents, using HOME with Low-Income Housing Tax Credits, and managing for ongoing compliance.

For more information on Rental Housing, see [24 CFR 92.252](#).

### Find by Resource Type

[Policy Guidance and FAQs](#)

[Guidebooks and Tools](#)

[Videos and Training Material](#)

### Policy Guidance and FAQs

#### FAQs

[HOME Rental Housing Development FAQs](#)

View HOME Rental Housing Development FAQs.

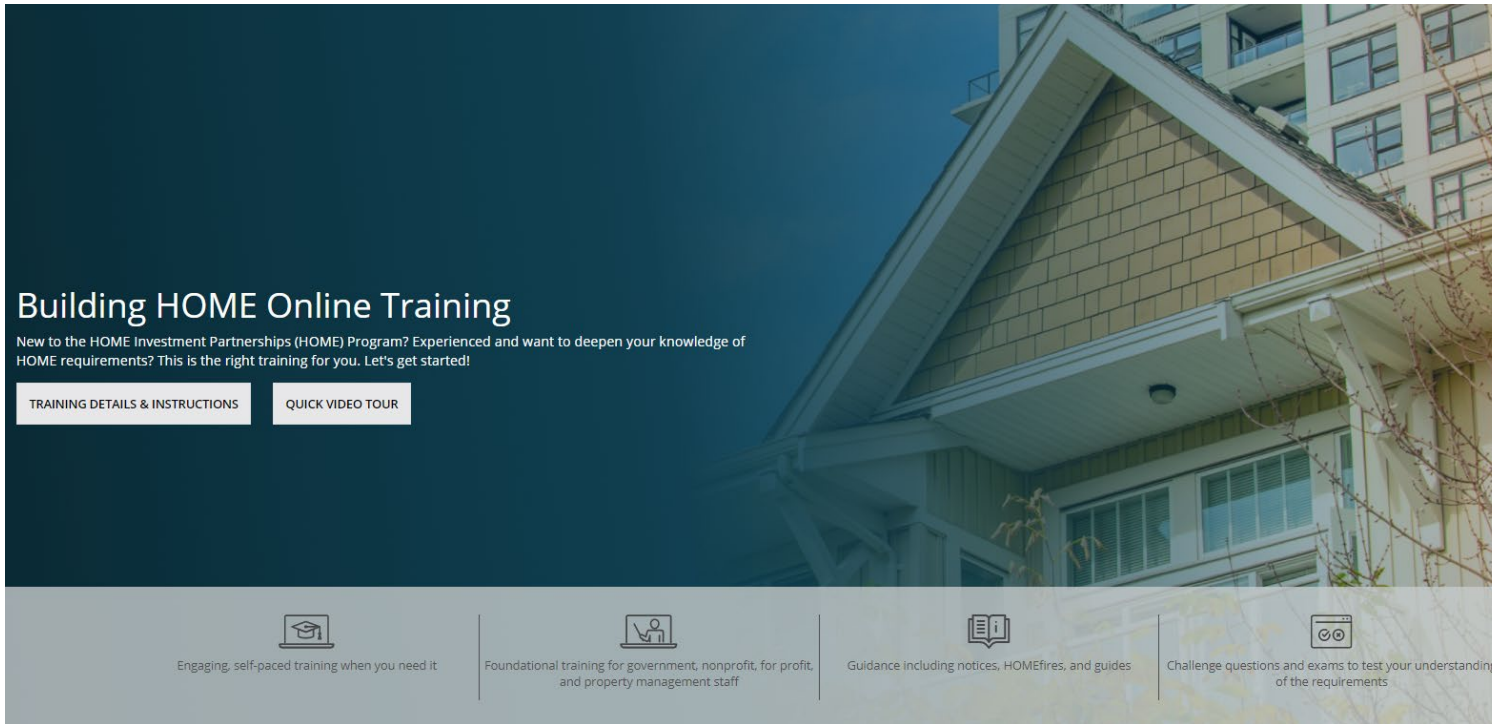
#### Program Limits

[HOME Maximum Per-Unit Subsidy Limits](#)

This notice establishes an interim policy that Field Office staff and PJs must follow directing PJs to use the Section 234-Condominium Housing basic mortgage limits, for elevator-type projects, as an alternative to the Section 221(d)(3) limits in order to determine the maximum amount of HOME funds a PJ may invest on a per-unit basis in HOME-assisted housing projects.



# Building HOME Online Training

A banner for the Building HOME Online Training program. The background is a photograph of a modern, multi-story residential building with a mix of wood and stone siding. The text "Building HOME Online Training" is prominently displayed in white. Below it, a smaller line of text reads: "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!". Two buttons are visible: "TRAINING DETAILS & INSTRUCTIONS" and "QUICK VIDEO TOUR". At the bottom, four icons represent different aspects of the training: a laptop with a graduation cap (Engaging, self-paced training), a person at a laptop (Foundational training), an open book (Guidance), and a calendar with a checkmark (Challenge questions and exams).A thumbnail for Module 6, titled "Rental Housing Activities". The image shows a construction worker in a yellow hard hat and safety vest, looking at blueprints on a construction site. In the background, there are cranes and the skeletal structure of a building under construction.

Module 6

Rental Housing Activities

A thumbnail for Module 7, titled "Long-term Compliance". The image shows a completed multi-story apartment building with a playground area in the foreground. The sky is blue with some clouds.

Module 7

Long-term Compliance

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



# Additional Resources

*Compliance in HOME Rental Projects: A Guide for PJs* (May 2012) available at:

<https://www.hudexchange.info/resource/2394/compliance-in-home-rental-projects-a-guide-for-pjs/>

*Compliance in HOME Rental Projects: A Guide for Property Owners* (May 2012) available at:

<https://www.hudexchange.info/resource/2395/compliance-in-home-rental-projects-a-guide-for-property-owners/>

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?



# HOME Monitoring Webinar Series Overview

Understanding Monitoring 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
	<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
	<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

