

U.S. Housing and Urban Development Multifamily Accelerated Processing (MAP) Guide Industry Briefing #5 Delegation to FHA Lenders to Initiate Section 106 Consultation



### Questions?

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- Please submit your content related questions via the Q&A box
- Send questions to Host, Presenter, and Panelists
- Questions will be answered during the final portion webinar
- Please submit audio/visual or other technical questions via the Q&A box
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## Today's HUD Presenters



- Sara Jensen, Housing Program Environmental Clearance Officer
- Nancy E. Boone, Federal Preservation Officer,
   Office of Environment and Energy

## Agenda



- Background
- Applicability
- Delegation of Authority and Limits
- Process for Lenders
- No Potential To Cause Effects Memos
- Programmatic Agreements
- Q&A

### Background



- HUD completes reviews for FHA applications under 24 CFR Part 50, using the HUD Environmental Review Online System (HEROS)
- Due to tight processing timeframes, Lenders want to initiate consultation with SHPOs earlier in the process
- Delegation Memo will authorize Lenders to carry out Section 106 review of FHA financing and refinancing projects, with certain limitations
- Delegation Memo will create a consistent path in all states, give clear guidance for what can and cannot be delegated, and will allow more time for Section 106 review

### National Historic Preservation Act



- The National Historic Preservation Act of 1966 requires federal agencies to consider the impact of their projects on historic properties
- Process known as "Section 106" Review
- Applies to undertakings with federal assistance, permit, license, or approval
- For Office of Housing Multifamily and Healthcare FHA programs, undertakings include financing and refinancing and any associated acquisition, new construction, rehabilitation or demolition

### Regulations and Guidance



- Section 106 regulations at 36 CFR 800
- Adopted in HUD regulations at 24 CFR 50.4(a)
- MAP Guide requirements 9.6.4
- 232 Handbook requirements 7.5.E

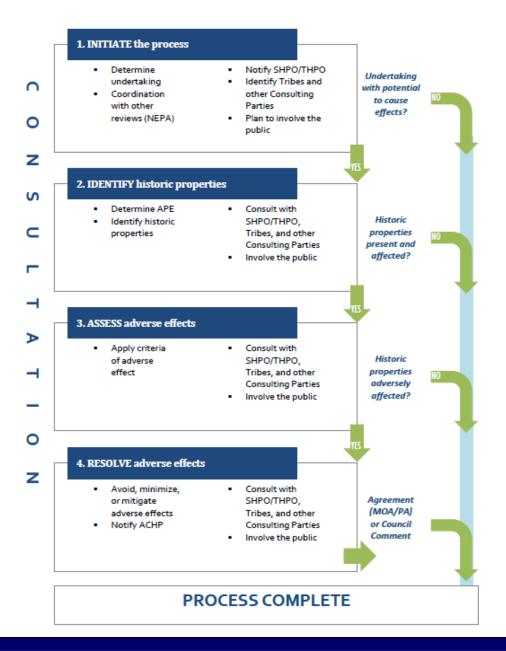
## Section 106 Training



- Section 106 Webinar for FHA Programs (July 2020 archived)
   https://www.hudexchange.info/trainings/courses/section-106-historic-preservation-for-multifamily-and-office-of-residential-care-fha-programs/
- Additional resources at end of the presentation

### Section 106

#### **Section 106 Process**





### Historic Property



- Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places.
- The term includes artifacts, records, and remains that are related to and located within such properties.
- The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

# **Consulting Parties**



- Agency Official HUD Office of Housing
- State Historic Preservation Officer (SHPO)
- Applicants Lenders
- Federally recognized Indian tribes and Native Hawaiian organizations (NHOs)
- Tribal Historic Preservation Officer (THPO)
- Local governments
- Organizations with demonstrated interest
- Public
- Advisory Council on Historic Preservation (ACHP)

### **Standard HUD Process**



- HUD determines if any of the following apply:
  - No Potential to Cause Effects Memo
  - Project activities do not exceed "Maintenance"
  - All activities in project are Exempt in a Programmatic Agreement
- If they do not apply, HUD conducts full Section 106 review and makes one of three possible findings:
  - No Historic Properties Affected
  - No Adverse Effect
  - Adverse Effect



Delegation to FHA
Lenders to
Initiate Section 106
Consultation

### **Delegation of Authority to Initiate Consultation**



#### 36 CFR 800.2(c)(4)

- The agency official may authorize an applicant or group of applicants to initiate consultation with the SHPO/THPO and others, but remains legally responsible for all findings and determinations charged to the agency official.
- The agency official shall notify the SHPO/THPO when an applicant or group of applicants is so authorized. A Federal agency may authorize all applicants in a specific program pursuant to this section by providing notice to all SHPO/THPOs.
- Federal agencies that provide authorizations to applicants remain responsible for their government-to-government relationships with Indian tribes.

### **Delegation of Authority to Initiate Consultation**

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- Very limited applicability at HUD
- HUD Office of Environment and Energy (OEE) is issuing a delegation
  of authority for Lenders and their authorized representatives to
  initiate Section 106 consultation in certain circumstances
- Notified SHPO/THPOs on February 17, 2021, Teams meeting on March 5, 2021
- Lenders must include a copy of the Delegation Memo with the consultation request and provide contact information for Lender and consultant, and reference the FHA program

## **Delegation Memo**



- Lenders choose whether to use the Delegation Memo for each application
- If Lender does not use the Delegation Memo, HUD staff will initiate consultation with the SHPO
- If Lender uses the Delegation Memo, they must ensure compliance with all Section 106 regulations and guidance
- In all cases, only HUD may conduct consultation with Tribes and NHOs

### **Delegation Memo**





U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, DC 20410-7000

MEMORANDUM FOR:

State Historic Preservation Officers (SHPO) and Tribal Historic

Preservation Officers (THPO), MAP- and OHP-approved Lenders

FROM:

Elizaveth Zepeda, Acting Director, Office of Environment and Energy

Department Environmental Clearance Officer

SUBJECT:

Authorization of MAP- and OHP-approved Lenders and Their Authorized Representatives to Initiate Section 106 Consultation

For HUD Office of Housing Programs

EFFECTIVE DATES:

March 18, 2021 to December 31, 2022

## **Delegation Memo**



- Applies to MAP and OHP-approved Lenders and their Authorized Representatives
- Applies to Section 106 review carried out under 24 CFR Part 50
- Applies to FHA programs in Multifamily Housing and Healthcare listed in Delegation Memo
  - NOT to FHA Risk Share Program
  - NOT to other Office of Housing Programs such as RAD or Asset
     Management (unless combined with FHA)
  - NOT to other Program Areas at HUD (Public Housing, CPD, etc.)

## **Applicable Programs**



- National Housing Act:
  - Sections 220, 221(d)(4), 231, 213, 241(a): New Construction or Substantial Rehab
  - 232: new construction or substantial rehabilitation of healthcare facilities
  - 242: new construction or substantial rehabilitation of hospitals
  - 207/223(f), 232/223(f): purchase or refinancing of existing rental housing or healthcare facilities that may have been financed originally with conventional mortgages
  - 223(a)(7): streamlined refinancing of currently insured FHA loans
- Proposed repairs, rehabilitation and demolition must be reviewed as part of the project

# **Effective Dates and Implementation**



#### **Effective Dates**

• March 18<sup>th</sup>, 2021 - December 31<sup>st</sup> 2022

#### **Implementation**

- Multifamily Guidance in 2020 MAP Guide
- Healthcare Guidance in ORCF Lean Thinking Blast
  - Follow 9.6.4 of the MAP Guide



- Will allow consultation to begin when HUD issues FHA number
- Will require a Qualified Historic Preservation Professional when a project includes:
  - Demolition of a building over 45 years old
  - New construction in or adjacent to a listed or eligible historic district
  - Substantial ground disturbance
  - Exterior rehabilitation of a building over 45 years old



- Section 106 findings must meet professional preservation standards
- Consultant who meets academic and experience requirements in the <u>Secretary of the Interior's Professional Qualifications Standards</u>
  - Archeology, Architectural History, History, Architecture, Historic Architecture
  - Verify with resume or curriculum vitae
- Expertise in identifying historic properties, evaluating effects, and preparing Section 106 agreement documents like MOAs
- Eligible project expense



- Demolition of a building over 45 years old
  - Architectural Historian to determine if the building meets the National Register criteria and is considered a historic property
  - Archeologist to evaluate potential for archeological sites on the property that would be disturbed in the demolition



- New construction in or adjacent to a listed or eligible historic district
  - Architectural Historian to evaluate buildings in the vicinity of the project and determine the Area of Potential Effect (APE)
  - Architect to design a compatible new building
  - Archeologist to evaluate potential for archeological sites on the property that would be disturbed in the project



- Substantial ground disturbance
  - Archeologist to evaluate potential for archeological sites on the property that would be disturbed in the project
    - If known potential for archeological sites, archeologist could be involved from the beginning
    - In other cases, archeologist may be brought in later when consulting parties or tribes identify archeological concerns



- Exterior rehabilitation of a building over 45 years old
  - Architectural Historian to determine if the building meets the National Register criteria and if so, to identify historic features that should be preserved
  - Historic Architect to design rehabilitation to meet preservation guidelines and avoid an adverse effect



- HUD must enter consultation when:
  - Project may have an adverse effect
  - There is disagreement with SHPO/THPO
  - Tribes, consulting parties or the public object to Lender determinations
  - There is possible foreclosure or anticipatory demolition
  - HUD deems the consultation record inadequate
  - HUD OFFICE OF HOUSING IS LEGALLY RESPONSIBLE FOR ALL FINDINGS



### HUD must enter consultation when:

- Project may have an adverse effect (36 CFR 800.5)
  - An historic property may be harmed through alteration or loss of historic features or setting, demolition, removal, or transfer
- There is disagreement with SHPO/THPO
  - Lack of SHPO concurrence on identification of historic properties or evaluation of effects of the project



#### HUD must enter consultation when:

- Tribes, consulting parties or the public object to Lender determinations
  - Lender must consider information and comments received from tribes and consulting parties before making findings
  - Consult to resolve disagreements
  - If not resolved and parties object to findings, HUD will enter and complete consultation
- There is possible foreclosure or anticipatory demolition

### Foreclosure



36 CFR 800.9

Where an agency official has failed to complete the requirements of section 106 in accordance with the procedures in this part prior to the approval of an undertaking, the Council's opportunity to comment may be foreclosed.

36 CFR 800.16 (j)

Foreclosure means an action taken by an agency official that effectively precludes the Council from providing comments which the agency official can meaningfully consider prior to the approval of the undertaking.

- ACHP comments to Agency Official, Head of Agency, Public
- Finding of foreclosure can be used in litigation

## **Anticipatory Demolition**



Section 110(k) of the NHPA:

"Each Federal agency shall ensure that the agency will not grant a loan, loan guarantee, permit, license, or other—assistance to an applicant who, with intent to avoid the requirements of section 106 of this Act, has intentionally significantly adversely affected a historic property to which the grant would relate, or having legal power to prevent it, allowed such significant adverse effect to occur, unless the agency, after consultation with the Council, determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant."

## **Anticipatory Demolition**



#### MAP Guide:

Even before the concept meeting or application submission takes place, any action by a potential Lender or Borrower, or any action by another party that the Lender or Borrower has the legal power to prevent, which is taken with the intent to circumvent Section 106 review and that significantly adversely affects a historic property, could result in rejection of an application.



HUD must enter consultation when:

- HUD deems the consultation record inadequate
  - HUD will review Section 106 record in HEROS and confirm that it
    - is complete and complies with regulations and HUD guidance
  - If inadequate, HUD will enter and continue consultation to resolve inadequacies before approving project

# Documentation 36 CFR 800.11



- a description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, and drawings, as necessary;
- description of the steps taken to identify historic properties;
- a description of the affected historic properties, including information on the characteristics that qualify them for the National Register;
- a description of the undertaking's effects on historic properties;
- an explanation of why the criteria of adverse effect were found inapplicable or applicable, including any conditions or future actions proposed to avoid, minimize or mitigate adverse effects; and
- copies or summaries of any views provided by the consulting parties, including Indian tribes, and the public.

# Lender Actions without the Delegation



#### Applicant may:

- Assemble complete project description
- Assemble information for the Section 106 review
  - May include initial technical assistance contact with SHPO to identify historic properties
- Obtain studies, historic property surveys, etc. as necessary
- Alert the Agency Official regarding potential adverse effects of the project
- Provide information to Agency Official
- Prevent actions prior to completion of Section 106

# Lender Actions without the Delegation



#### Documentation:

- project narrative,
- map with site location and APE,
- list of consulting parties,
- description of historic properties (listed and eligible),
- clear digital photos of buildings and setting,
- description of the proposed project activities,
- description of direct or indirect effects on the historic properties,
- and a proposed determination of effect
- Follow SHPO submission procedures

# **Historic Preservation Professional**



#### MAP and 232 Guidance:

Because of the technical nature of historic property identification, evaluation and treatment, it may be appropriate to retain a qualified historic preservation professional to prepare the initial consultation and supporting documentation even for projects where HUD is conducting the consultation directly or for delegated projects that do not otherwise require it under 9.6.D.4.b. Such consultant should meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) and have experience in Section 106 reviews. Examples of when retention of a qualified historic preservation professional may be appropriate include when National Register eligibility of a property is unclear, when adverse effects are expected, when the property contains archeological sites, and/or when the project is controversial.

# Tribal consultation



 Notify HUD when the project involves types of activities that may affect historic properties of religious or cultural significance to tribes such as:

CPD-12-006 Appendix A

- Significant ground disturbance (digging)
  - Examples: new sewer lines, utility lines (above and below ground), foundations, footings, grading, access roads
- Work on a building with significant tribal association
- Transfer, lease or sale of historic properties of religious and cultural significance

# Tribal consultation



• CPD-12-006 Appendix A

- New construction in undeveloped natural areas
  - Examples: industrial-scale energy facilities, transmission lines, pipelines, or new recreational facilities, in undeveloped natural areas like mountaintops, canyons, islands, forests, native grasslands, etc., and housing, commercial, and industrial facilities in such areas
- Introduction of incongruent visual, audible, or atmospheric changes

# **Tribal Consultation**



- Tribal consultation process does not change
  - The delegation does not extend to consultation with Tribes or NHOs.
  - HUD must initiate and conduct consultation with Indian Tribes or NHOs when a project contains activities that may affect properties of religious and cultural significance to Tribes or NHOs
  - Draft supplied by Lender or consultant
  - HUD reviews and sends letter or email to Tribes or NHOs
  - Follow HUD Notice on Tribal Consultation CPD-12-006 and Supplemental Memo

# **Timing of Tribal Consultation**



- Lenders must coordinate with HUD on HUD's consultation with Indian Tribes
- Lenders must consider comments received from Tribes or NHOs within review timeframes before submitting a finding of effect to SHPO for concurrence

# **Timing of Tribal Consultation**



### **Healthcare**

HUD will initiate Tribal consultations after FHA number assigned when requested via
 LeanThinking@hud.gov

# **Multifamily Housing**

- Standard MAP Guide: HUD will initiate Tribal consultation when application enters queue
- LIHTC Section 221(d)(4) Pilot: HUD will initiate tribal consultation within 5 days of Concept Meeting Encouragement Letter (Notice H 2019-03)

# Delegation Process



- Lender or consultant enters information and documents in HEROS
- For Section 232 projects: Lender also submits information and documents in the Mortgage Insurance application in Section 2 – Third Party Reports
- HUD reviews material and findings and approves review in HEROS
  - If inadequate, HUD enters consultation and completes review
- When Section 106 and all other compliance reviews are complete, HUD issues Firm Commitment for project

# HEROS



**Project Name: Sara-Test-1** 



#### 2050 - Historic Preservation (50/58)

General Requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

#### Reference

https://www.onecpd.info/environmental-review/historic-preservation

Note that if you change answers on this screen, make sure to press "Next" button in order for the information to save and proceed to the appropriate next question.

#### Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA 0). (See the PA Database to find applicable PAs.)
- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
- Yes, because the project includes activities with potential to cause effects (direct or indirect).

#### The Section 106 Process 0:

After determining the need to do a Section 106 review, initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Registe of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Note that consultation continues through all phases of the review.

- Step 1: Initiate consultation
- Step 2: Identify and evaluate historic properties
- Step 3: Assess effects of the project on historic properties
- Step 4: Resolve any adverse effects

## HEROS





#### Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the When To Consult With Tribes checklist within Notice CPD-12-006: Process for Tribal Consultation to determine if you should invite tribes to consult on a particular project. Use the Tribal Directory Assessment Tool (TDAT) to identify

#### tribes that may have an interest in the area where the project is located. Note that consultants may not initiate consultation with Tribes. Select all consulting parties below (check all that apply): State Historic Preservation Offer (SHPO) Status: --Status of Consultation--Advisory Council on Historic Preservation Status: --Status of Consultation--Indian Tribes including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs) Consult the When To Consult With Tribes checklist, and upload completed checklist in the Screen Summary at the conclusion of this screen. Name: Status: --Status of Consultation--Add Tribe or NHOS Other Consulting Parties Upload all correspondence, notices, and notes (including comments and objections received) in the Screen Summary at the conclusion of this screen. \*Describe the process of selecting consulting parties and initiating consultation here:

Next

# HEROS-Documenting Delegation Memo



The Phrase "Delegation Memo" must be listed in text box.

\*Describe the process of selecting consulting parties and initiating consultation here:

#### Delegation Memo

[Lender and Authorized Representative] have followed the section 106 Delegation Memo. A copy of the delegation memo and all related correspondence is upload to the screen summary.

[Add specific details about selecting consulting parties and initiating consultation]

# No Potential to Cause Effects Memos



- Project Activities are limited to things that have no or minimal physical effects
- Memos posted online at <u>https://www.hudexchange.info/resource/3865/no-potential-to-cause-effects-to-historic-properties-memos/</u>
- Examples
  - 223(f) or 223(a)(7) refinancing of some mortgages with no associated rehabilitation or new construction and no activities beyond Maintenance

# Maintenance Notice



 "Notice CPD-16-02 Guidance for Categorizing an Activity as Maintenance for Compliance With HUD Environmental Regulations, 24 CFR Part 50 and 58"

https://www.hudexchange.info/resource/3197/guidance-categorizing-activity-as-

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	ature or System	Maintenance Activities <sup>4</sup>	Rehabilitation Activities <sup>5</sup>
Interior Walls	s and Ceilings	<ul> <li>patching or mending cracked plaster</li> <li>patching or fixing holes or cracks in drywall</li> <li>replacing stained ceiling tiles</li> <li>painting or wallpapering</li> </ul>	<ul> <li>installation of new drywall or paneling</li> <li>installation of new acoustical ceiling</li> <li>installation of dropped ceilings</li> </ul>

Feature or System	Maintenance Activities <sup>4</sup>	Rehabilitation Activities <sup>5</sup>
Roof	<ul> <li>fixing leaks</li> <li>application of waterproof coating to a flat roof</li> <li>replacement of deteriorated flashing</li> <li>in-kind replacement of loose or missing shingles or tiles</li> </ul>	<ul> <li>complete replacement of roof with new shingles, tiles, roll roofing, membrane, or new metal roof</li> <li>installation of solar panels</li> </ul>
Windows and Doors	<ul> <li>washing windows</li> <li>caulking, weather stripping, re-glazing windows and doors</li> <li>fixing broken windowpane(s), storm window(s) or damaged entry door</li> <li>replacing broken door lock</li> <li>replacing a vandalized entry door to restore security of a building or unit</li> <li>replacing a single severely damaged window to match</li> <li>annual switch out of storm and screen panels</li> </ul>	<ul> <li>replacement of windows</li> <li>replacement of exterior doors</li> <li>adding storm windows or storm doors</li> </ul>



# Part 50 Programmatic Agreements



PROGRAMMATIC AGREEMENT
BETWEEN REGION IV OF
THE U. S. DEPARTMENT OF HOUSING AND URBAN DE VELOPMENT
AND THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICE
FOR THE REVIEW OF HUD-FUNDED ACTIVITIES
SUBJECT TO 24 CFR PART 50
IN THE STATE OF SOUTH CAROLINA

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") through various offices, including the Public and Indian Housing (PIH), Housing, and Community Planning and Development (CPD), provides grant funding, mortgage insurance and other assistance, subject to environmental review under 24 CFR Part 50, "Protection and Enhancement of Environmental Quality", to entities within the State of South Carolina:

WHEREAS, HUD is responsible for complying with Section 106 of the National Historic Preservation Act of 1966, as amended, (54 U.S.C. § 300101 et seq.) implemented pursuant to 36 C.F.R. 800 ("Section 106") whenever HUD conducts an environmental review under 24 C.F.R. Part 50;

WHEREAS, through its field offices, HUD undertakes many activities that include the acquisition, leasing, repair, minor rehabilitation, disposition of properties, most of which are affordable housing, as well as other activities that include the substantial rehabilitation, demolition, conversion and new construction of residential and non-residential properties, each of which is an undertaking ("Undertaking") as defined pursuant to 36 C.F.R. 800.16(y).

WHEREAS, the Advisory Council on Historic Preservation issued in 1995 and revised in 2006 a "Policy Statement on Affordable Housing and Historic Preservation" that addresses implementation principles for Section 106 compliance, and those principles have been utilized in developing this Agreement;

WHEREAS, HUD has determined that some of the Undertakings funded by its PIH, Housing, and CPD programs have limited potential to affect properties included in or eligible for inclusion in the National Register of Historic Places (hereafter referred to as "historic properties") and have consulted with the South Carolina State Historic Preservation Officer ("SHPO") pursuant to 36 C.F.R. 800.14 of the regulations implementing Section 106;

WHEREAS, HUD invited the Catawba Indian Nation, Eastern Band of Cherokee Indians, Muscogee (Creek) Nation, Eastern Shawnee Tribe of Oklahoma, Tuscarora Nation, and Alabama-Quassarte Tribal Town to consult in the development of this Agreement and sign it as an Invited Signatory, in recognition of the unique government-to-government relationship between the Federal government and federally-recognized Indian tribes and none commented or accepted the invitation to sign the Agreement;



Kansas, California, Alaska, Minnesota, South Carolina



Pending in Texas



Model statewide Part 50 PA and proposed model Part 50/58 PA

# eservation Screen

#### STIPULATIONS

HUD will ensure that the following measures are carried out.

#### I. ACTIVITIES THAT DO NOT REQUIRE REVIEW

The following types of activities have little or no potential to affect historic properties and are exempt from further review under Section 106. To document and conclude the review, HUD shall note in the administrative record the applicability of one or more of the exemptions.

- A. Activities that are Exempt and/or Categorically Excluded and not subject to related laws under 24 CFR 50.19(b)
- B. Refinancing without demolition or rehabilitation of existing buildings, or new construction, and no physical activities beyond maintenance activities as defined in HUD Notice CPD-16-02 "Guidance for Categorizing an Activity as Maintenance for Compliance with HUD Environmental Regulations, 24 CFR Parts 50 and 58"
- C. Leasing without demolition or rehabilitation of existing buildings, or new construction, and no physical activities beyond maintenance as defined in HUD Notice CPD-16-02 "Guidance for Categorizing an Activity as Maintenance for Compliance with HUD Environmental Regulations, 24 CFR Parts 50 and 58"
- D. Projects including refinancing and rehabilitation of existing buildings less than 45 years old, with no ground disturbance, unless the property is located within or adjacent to or adjoining a National Register of Historic Places listed or eligible historic district
- E. Undertakings that are limited to the rehabilitation of interior spaces within single family residential structures as defined by HUD regulation as 1 to 4 unit residential



# Monitoring



- Annual Report run from HEROS prepared by Office of Housing and posted online
- Consider feedback, comments, and outcomes

 HUD will evaluate the Delegation Memo and make any necessary adjustments before re-issuing

# Resources



- Program guidance (MAP Guide and 232 Handbook)
- WISER online training modules
- FHA Specific Training
- Ongoing annual training
- HUD Historic Preservation web page
   https://www.hudexchange.info/environmental-review/historic-preservation/

# MAP Guide Ask A Question (AAQ)



- HUD recently announced the availability of a new resource, the MAP Guide Ask-a-Question virtual Help Desk, available at <a href="https://www.hudexchange.info/program-support/my-question/">https://www.hudexchange.info/program-support/my-question/</a>
- All future MAP Guide questions **should** be submitted to the MAP Guide AAQ, no longer to your favorite HUD staff.

Resources and assistance to support HUD's community partners			NEED	HOUSING ASSISTANCE?	Email Updates	I
HUD EXCHANGE Secretary Ben Carson	Programs ~	Resources ~	Trainings	Program Support >	Grantees ∨	N
Home > Program Support > Ask A Question						
Ask A Question						
The following Ask A Question desks are active: AFFH, BRAC, CNA e-To- Legacy Homeless Programs, NSP, Sage, and Title V.	ol, CoC, DRGR, eCon Planning	Suite, ESG, e-snaps	, HDX, HMIS, H	DPWA, HEROS, HUD-VASH,	IDIS,	
The CDBG and HOME Ask A Question desks are closed and no longer	accepting questions. Please of	ontact your <b>local C</b>	PD Field Office	e for assistance.		
Step 1 of 2						
Personal Information* Required fields						
*First Name						
*Last Name						
*State						

# Questions



Please send questions in the Q&A box to Host, Presenter, and Panelists



# Thank You

