Building HOME Webinar Series
Office Hours 1-18-18

Les Warner: Welcome everyone. This is our office hour session following our first installment of our building HOME webinar series. We're going to start out today by going through exercise one. So if you've done that, please pull that out or take out your copy and we'll work through it together. And then we will follow that by going through any questions that folks have and Kris and I will probably fill in as needed with some questions based on some of the things that we heard from folks yesterday.

So if you are coming to today's session with a question that you need answered and would like to hear more about a topic, you can go ahead and type those in on the Q&A box which is on the top right hand, you can click on and open that up. So you can go ahead and put those in now. So we're going to start with exercise one, which is looking at what are eligible activities for the HOME program.

And we're given a scenario with a community, Westminster, and given some information about that community. So around 150,000 people, 60,000 households, and we know that the area median income for a family of four is 35,000, that's the low income limit, 28,000, very low 17,500. The community is receiving $750,000 annually, and last year it also had $50,000 in program income. So if the 50,000 is a repeatable, a normal flow of program income, that means that they need to essentially build an $800,000 program to be able to utilize their full award, plus spend down that program income.

City's using 71 percent of its money for homeowners rehab, nine percent for admin costs, 15 percent for CHDOs, and then five percent of the funds are going to tenant based rental assistance. So we're given a list of suggested projects. We're making the assumption that there may be some other factors in this, we're answering whether it's an eligible use of the funds, but of course we understand that for any activity while undertaking, we're going to complete some other eligibility steps, such as looking at underwriting subsidy layering, some of the other restrictions that are overlays on this.

So in our first question A, the mayor's launching an initiative to increase affordable units by the year 2020 and is noting that there's a particular shortage of rental housing. And that's their primary focus on this. So council is proposing using HOME funds for rental housing development projects. So is this eligible or not? Well, we know that there are four eligible activities: HOME owner rehabilitation, home buyer, rental, and also tenant based rental assistance. So this – this does fit as an eligible activity.

B, public housing in the community is in terrible shape, the Housing Authority is requesting funding to be able to modernize it's 1937 Act Housing and they want to combine that with our HOME funds. So one of the things that we covered yesterday was the fact that HOME funds generally cannot be combined with public housing, in particular, cannot be combined with 1937 Act Housing. So our Hope six projects are something that would be eligible, but this is 1937 Act Housing, so this is something we would have to respond back and say no to.

Item C, we have a non-profit that wants to build 20 new rental units. All of the units are going to be four tenets with incomes between 50 and 80 percent of area median income. So rental development, absolutely an eligible activity. Now, if we were thinking through this further, we of course would be realizing, well, I've got to go through an underwriting process. I'm going to do a cost allocation to determine how many of those units are going to be HOME eligible.

And then we're going to be looking at things like our program or our project rule and how those would also implicate. One of the things I'll mention, I can move the exercise on my screen, but I believe for you, you will need to scan down the page yourself to be able to see these next questions as we're working through this.

Kris Richmond: And just if I could add to that, we – I'm putting the answers in the chat box, so if you missed what Les said, the answers are showing up in the chat box as well.

Les Warner: They're good. All right. So moving on, D, we have city staff that's proposing using home funds for down payment assistance to match funds that home buyers are able to save in the best bank program. So we're making the assumption that a best bank is APIA [ph] funding where there's a match between these other federal funds and we're using the HOME funds. As the household is saving money, that the home money and the APIA money would be combined in that. The APIA program actually has not recently received funding, so there may still be some programs operating, but it's probably something that, at least for the near future, we will not be seeing. So we know that downpayment assistance is eligible.

So we're going to answer that this is something that's eligible, but the cautionary note on this is – and we'll talk about this when we get to our homebuyer activity. That homebuyer is requiring us to underwrite and essentially determine what's the right amount of money that of subsidies that's going to be needed to make that unit affordable. So the idea that we are going to match the funds might not be actually true, because we're going to be looking at what's that remaining gap on affordability. And that's how we're going to size what that amount of home assistance is rather than a specific match on the other funds that might be available.

All right. So item E, we have our community builders CHDO and they want to do an emergency home repair program for senior citizens. And they want to use HOME funds for emergency repairs. Well, we'll probably talk more about this as we get into each of our eligible activities. But the key point here to remember is that our – any unit that we assist with HOME funds will have to be brought up completely to our property standards.

So a number of you I would assume have worked or currently worked with the community development block grant called CDBG, which would allow you under that program to be able to go in and address one or two systems. So if their roof is leaking, you could go in and replace the roof, but not be required to inspect all of the other systems of that unit and bring them up.

The HOME program would say if you're going to put HOME dollars in, the entire structure would need to be brought up to standards. So emergency repair programs are not eligible under HOME. In addition to that, we have some specific CHDO satisfied eligible activities that we'll be covering next week. And any kind of rehabilitation, even the full rehabilitation would not be something that a CHDO could do out of the set aside. So E is not eligible. Excuse me.

For F, the city increasing – they're increasing unemployment rate has resulted in more homeless population. And city council is saying, hey, let's use some of our HOME funds for a homeless shelter. So this again, it's something that is not going to be eligible because our focus, our restriction on use on our HOME funds is for permanent housing. So a shelter where an individual is going to be temporarily housed will not have a lease, will not have a specific assigned space that is there's, is not going to be an eligible use of HOME funds. All right. So F is not eligible.

G, the Westminster's CHDO is looking for additional funding for construction of an affordable rental development. They're planning on this starting in two months. The CHDO wants $20,000 of GAP funding to be able to finish this project. So they're requesting money for new construction of rental housing. Well, that is eligible. This should raise – as you look at this – this should raise some red flags, though, on thinking about okay, I've got some other questions that immediately pop into my head as I look at this proposal. So if this project is to start in two months, you have some timing issues on being able to complete your review of an application, do your underwriting subsidy layering. You have things such as environmental review, which you would need to be completed before any choice altering actions would be taken.

And of course, this is the project that it sounds like has been in the development phase of putting the package together for some period of time. It may not have, until this point, have included any federal dollars. So the impact of filling a $20,000 GAP using HOME funds and now kicking in not only all the HOME regulations but all the other federal requirements. It may be that the GAP now becomes larger than just $20,000 because of some of the rules and requirements that are going to apply on that. So yes, it's an eligible project as far as rental development, but they'll be a lot of questions and action that, that PJ will need to be able to complete before it can actually make that commitment for the project. And that may well delay this two months start date. All right.

Item H, we have a rental project owner that's talking about an issue about sidewalks in the neighborhood that's where the affordable rental developments are. And excuse me. So if city council member is proposing using HOME funds to repair the city sidewalks. So I believe Kris covered yesterday, one of the things we mentioned was the home funds as far as eligible uses, can only be used for onsite infrastructure.

So if we were funding a project – let's say there was an existing rental project and there were sidewalks on that project site that were not up to our standards, we could replace those sidewalks that's part of our project. But this appears to be talking about sidewalks that are within that neighborhood. They're going to be used by the local residents. That would – is offsite infrastructure and it is not something that we can utilize our HOME funds for. Again, this might be a situation where our CDBG funds might be a good fit for being able to address those issues, which obviously have an impact for the residents of our community, but we simply can't use HOME funds for them.

All right. So moving on to I, we have a non-profit that wants to demolish – they want to use HOME funds to demolish 20 existing units and then rebuild 10 quality affordable units. And they want to use HOME funds to be able to do – do that. So their activity is constructing 10 affordable HOME units, they're going to use the HOME rents as part of that. Demolition is something that's eligible as long as it's linked with housing production. So the activity itself is eligible. We have an overlaying issue on this though, which we haven't really covered yet about section 104D which is protecting the supply of affordable housing.

So if we use HOME funds in this project and we eliminate 20 units and only replace it with 10 units, we have reduced the supply of affordable housing. And so the PJ would have a requirement to essentially have a replacement plan, what we would call under Barney Frank, which is the section 104D, one for one replacement plan. So they would need to be able to identify either recently added affordable units in that community or a plan moving forward that those units would be replaced. And oftentimes that simply looking at your pipeline of projects and being able to cite some additional units, but that would be one of the implications of this eligible use of funds, that we're going to trigger some other compliance issues. All right. So I is eligible.

J, we have a CHDO that wants to run a TBRA program to help low income families be able to find affordable housing. City wants to fund this with CHDO – CHDO set aside funding. So TBRA, Tenant Based Rental Assistance is one of our eligible activities. The problem with this is that it is not a CHDO satisfied eligible activity, so it's an eligible use of home funds. But if we funded that showed CHDO we would have to fund them as a subrecipient, so it would not be coming out of that 15 percent. If you think about our sheet cake chart that we looked at yesterday, we would not be coming from the far right of that, which was our 15 percent satisfied at a minimum. It would be coming from the middle section of that chart, which would be our general eligible projects.

So the city can fund it, but it simply has to come out of there non CHDO funds as part of that. Now while we're on this topic, let me just kind of talk a little bit about the fact. So the CHDO is a non-profit organization and we're certifying them for a CHDO eligible activity meeting all of our criteria of the community based development organization. But they also, as a non-profit, would qualify to function as a subrecipient. So they could be undertaking any of our eligible projects and we could fund them as a subrecipient.

The thing that's important here, though, is that when we get to the administrative requirements, we're going to be talking about that the rules for a CHDO versus a subrecipient are different. So some of the things like procurement, audit requirements, things like program income apply to a subrecipient and they do not apply to the CHDO. So we could have an organization that was receiving funding under their certification as a CHDO and have projects funded out of the set aside and have agreements that are CHDO agreements that have a different set of regulations than money they might be receiving as a subrecipient. So we would have to really work with that organization to make sure they understood the requirements that went with sort of both of the roles that they might be playing. And that they had adequate systems essentially in place to be able to stay in compliance with that.

All right. K, city has a code enforcement problem with student housing and the university is requesting $200,000 to repair a student housing to address those code violations. So one of the things that is specifically disallowed with the HOME program is using funds in conjunction with student housing. So this is something that you would need to be able to point out that regulation, this is a not eligible.

Part of the reason that we go through this exercise is that you as the HOME program administrator are often going to be approached with very good, very needed projects. But you're going to have to be able to explain and sometimes point back to the regulation to make it very clear why you're having to say no and why HOME funds cannot be used for that project. So it becomes really important to know these requirements so that you have a way to be able to respond appropriately. All right. So K is ineligible.

Our last one, city will provide grants to a small property, rental property owners, so we're talking two to four units to bring these up to code. And as part of this proposal, the tenants that we're going to be serving are restricted to at or below 80 percent of area median income. So rental assistance, rental activity is one of our four eligible activities. And so we have restrictions about affordability, we have restrictions about income. So this appears to be an eligible use of funding.

We will have to think about all of the activities, specific requirements that will go along with that, such as our program rule. Depending on how this is being triggered, we may have some targeting that will have to be lower than that 80 percent. And the courts will be applying not only a restriction on incomes, but will be restricting those rents to be affordable throughout whatever the designated affordability period would be on that. So it is an eligible activity, but have some other elements to it that need to be incorporated into that. Kris, are there any questions? Let's see if I can open this up. Come –

Kris Richmond: Yeah. There is one that just came in asking about is there affordability periods for homeowner rehab if the homeowner is set up with the differed loan, is there an affordability period? And I just typed back that for homeowner rehab, also known as owner-occupied rehab, HUD does not have an affordability requirement. There is affordability periods for homebuyer programs, but not owner occupied rehab.

Les Warner: Right.

Kris Richmond: But you the PJ can – you can add an affordability period if you want to, but HUD does not require one for that activity.

Les Warner: Right. And I think if you were to probably do a survey across the country, I think probably the majority of programs are imposing some kind of an affordability period as part of their program design because of the concern of if I go in, let's say I spend, I don't know, $25,000 on doing a rehab to bring that home owners unit up to our standards. Without imposing some kind of that affordability period on that or some kind of a loan or lien situation, we could simply have that homeowner now turn and sell the unit and pocket the money.

And our goal is to create and protect our supply of affordable housing. So it's very common for PJ's to choose to impose some kind of an affordability period. Because of that, you need within your own local program design to have laid out what's the criteria going to be how's that calculation going to be handled. So you have a consistent approach on that. And keep in mind, since it is a locally imposed affordability period rather than the HOME program itself, you have the ability to waive that with some kind of a standard process in that. So you need some policies and procedures that are going to be surrounding that and kind of think about how will we enforce this? How will we work with this particular policy?

Kris Richmond: Great. And we just had another question come in, can a homeowner rehab project proceed if the homeowner is subject to a federal tax lien on the property?

Les Warner: Well, so the HOME program itself doesn't have some kind of – doesn't have a restriction about sort of the status on this. But you, as a program, oftentimes will have – the one restriction that is in place is saying that you can't use HOME funds to pay back taxes. I would think you, as the PJ in approaching this are – are going to be thinking about, okay, so we're making this investment, we want to make sure that this house is going to continue to be affordable housing.

If there's a risk for this household of not being stable because of this tax lien, it may be, and it will be kind of common, that you would see that part of that program design would say that they either need to be current or in some cases might be current being defined by having set up some kind of a payment plan, which would have them be in compliance with that agreed to plan. But there is no HOME restriction on this. So it becomes a program design element.

Kris Richmond: Great. Thanks. That's the only questions that have come in right now. I want to encourage people to go to the Q&A box and type in your questions there. And Les, is there any common ones that came up yesterday that we would kind of benefit from?

Les Warner: I was just going to revisit a little bit. You and I talked after our session. I think, well, we spent some time talking about these different rules. So the old HOME rule, the 2013 final rule, the fact that we had some appropriation language for 2012, 2013 funding. And then also that we have the interim commitment rule which makes some changes. So I think for folks that are new, this probably felt a little bit overwhelming in this. So the point that I was trying to prepare you for, I guess, is thinking about – so as you are implementing new projects, you are – are under the 2013 rules and we temporarily have our commitment and our expenditure rule has been suspended except for CHDOs. So CHDOs still have the 24-month commitment requirement, they also still have the five year expenditure requirements. But during this transition period, you have – there's sort of a life cycle for all of your projects. You fund them, they're at the development phase once they're placed in service, many or most of our projects are going to have an affordability period.

So as part of your oversight, your monitoring on this, during this period, you're going to have projects that fall under multiple rules because of this sort of transition from the old rule to the new rule to the appropriation language and then some of these other temporary things. So I think if you're new, focus on the fact that you have all the new HOME rule requirements, which we're training you on, that you have a nine-month sales deadline. You have an 18 month rent up timeline; you have a four year project completion requirement.

Those are sort of the key elements here. But you will have some existing projects that will also have been held to this 24-month commitment requirement of five year expenditure requirement. And then I think the other key point here is CHDOs, unlike our other activities, still are falling under this 24-month commitment deadline. So meeting, we'd spent quite a bit of time talking about what is a commitment, what is a fully executed written agreement. All that needs to be carefully in place for our CHDOs meeting, that 24-month timeline, and also making sure that not only you meet the four year project completion, but you have a five year expenditure rule that also applies.

So it's a lot to absorb, but if you'd simply take the approach of analyzing on these existing projects when it was committed, that'll kind of walk you through and figuring out what are the rules that specifically applied at the time. Kris, do you want to revisit just a little bit? We seem to have quite a bit of questions come through yesterday about income and maybe just revisit a little bit the two definitions and how those are used.

Kris Richmond: Sure. So we have the section 8, part 5 definition that is the one that's most commonly used in the jurisdictions, we see that a lot more commonly. And then we have the – sorry, I'm trying to pull my notes up here. Make sure we're covering everything we need to talk about. We have the IRS adjusted income; this is also the other – the second definition that we use. One more page.

And so these are – we're trying to find anticipated income. So what is the income going to be for that next coming year? Using the methodology that's found within the section 8, part 5 definition or the IRS adjusted gross income definition. And so, what we're not doing is just getting the – the tax income reports from last year and looking at that. That can be used as a beginning for you to know, okay, well, they worked at this place. Are you still working at this place and getting the information from their current workplace. But we don't want to use old data, we want to make sure we're getting anticipated data. So those are the two definitions.

There's the income calculator that is available on the HUD exchange. I know many of you have are – are comfortable with that you've worked with that. If you haven't, I highly suggest you go to the HUD exchange to look at that and you do need to know what your income definition is before you start to use it. But it really helps walk you through what all the different types of income that are coming in, the source documents that you have, where are you pulling that information from, putting it all together, and then a comparison against the jurisdiction that you're working in with that number of household – in the household as to whether they're income eligible or not.

So that's what we're looking for, for eligibility. And then when we talk about payments, so if you have a rental property and the owner is – is re-certifying their income on an annual basis, and somebody ends up being over income, and we'll talk more about this when we get into the rental section. But if they're over income, they need to pay up to 30 percent of their adjusted income if they're in uploading unit and they could be over a 30 percent if they're in a fixed unit. And that adjusted income is the methodology we would use when trying to determine what a payment would be. So Les, anything else you want to add to it?

Les Warner: Yeah. I'll just add a couple things and then we actually got a related question that I can also address. So I think sometimes when people hear us say we're anticipating income, they think, well, okay, so I have someone who – let's say maybe they are, I don't know, they're – they're working at a fast food restaurant but they have applied or they are anticipating getting a new job and earning more income.

When we talk about anticipating, we're taking what their current known income is and calculating that or projecting that forward for that 12 month period. We're not going to count something that has yet to occur. Now in some cases, we will have a known documented that they're going to be receiving an increase in pay that might be included in that. But when we talk about anticipate, we're really talking about taking their current income and then projecting it forward. I also will mention that one of the changes under the 2013 rule is setting a minimum requirement on source documentation.

So when we say source documentation, we're talking about having pay stubs, having statements of benefits that are received. So the new rule set a minimum of a two month time period to have those source documents as part of your income documentation. We oftentimes get questions where folks say, well, I'm actually getting a third party statement from the employer, which is giving me maybe 12 months' worth of information.

Do I still have to have pay stubs in that file for that two months? And the answer is yes. So it's very helpful to get the 12 months of information from the employer and that tells us a lot about seasonal variances or over time that will be expected to be received. But under the 13 rule, you are required to also collect those source documentation such as pay stubs and copy those and have those in the file. We also had a really good question that came in asking about, okay, so we've got projects that as we are processing. I'm trying to scroll back to this.

As we are processing our loan applications, we will have some time lapse. So if I have – let's say I'm running a homeowner rehab program and maybe I have an open application period, I'm going to collect applications from the community. At the point that I closed that window, I'm going to take all of my applications and I'm going to begin to process them. So I might have, as part of my application process, collected initial income information. So let's say I started that in January. I'm going to go through these, determine whether they appear to meet the criteria, but I then might be then doing – let's say I'm doing a, I have a rating and ranking system where I'm going to score these and determine sort of the order in which I would begin to assist households until I ran through all of my budget. So I might designate that out of the 60 applications that I got that 10 of those that we appear to have budget adequate to cover 10 of those households given our program limits.

And at that point I might be getting inspecting units and doing a scope of work, coming up with that pre-bid estimate on those households. So depending on how your program is operating, that may take you a period of time. So the question on income is, we've said that the – to be current and valid income, it can be no – it cannot be older than six months. So if we took income documentation in – in January, we only have through June to have – to have that to be considered to be invalid. So if I am now, let's say in July, having been determined, okay, I'm ready to actually commit funds to 10 of these households. If it's past six months, I'm going to have to go back and update that income information and make sure that it is valid and current. So it becomes really important to have dates on that income and to also be double checking before you sign that commitment to make sure is this income still valid or do I need to go back and update that information?

Two other things that relate to that, we have a couple of times when we would operate a little bit differently. If we'll be talking about a lease purchase program where we would assist a household, they're going to sign a – an agreement that allows them to lease a property for a period of time and then have a – as part of that, they're right to purchase and a timeline on that. So we also would have cases where we might be assisting someone for the new construction of a unit. So units not existing now, we're going to commit our funds to them, we're going to – they're going to sign a construction contract. So it's going to take some time before that unit is available.

So in both these cases, we're committing money, we're finding them to be income eligible, but that actual closing on the property, whether it's the lease purchase, the purchase finally happening, or this newly constructed unit, the fact that it goes past six months in these cases does not require us to then go back. Both the – we find that this newly constructed unit's finally finished, they're ready to close their requesting the city's downpayment assistance at that point. As long as you committed that money and found them eligible at that point, you do not have to go back and re-certify. So if that household has had an increase in income and is now above 80 percent, it's not a problem. You have finished your duties as far as income. As the point that you found them eligible and committed the funding.

Kris Richmond: Hey Les, I think maybe talking a little bit this would be helpful too because somebody's asking what is the start of the 24-month commitment period?

Les Warner: Yeah. Yeah. So when we talk about having 24 months to commit our funds, at the point that you receive your grant agreement with HUD for your annual allocation of HOME funds, that begins the time period at which you then have 24 months to identify eligible activities, or fund a subrecipient to operate a program. And so that's the start of the count on that 24-month period. So for you as the PJ and kind of trying to think how do I make sure I'm going to be in compliance with that?

And even in the absence of our new money and having that requirement, you still need to get that pipeline moving and be able to provide those services. Kind of have to think through what's my timing going to be? What are all the steps? So when do I need to get an application out? What will my timing be on processing and making funding decisions? Those sorts of thing. But it starts at the point that you have your annual award in place.

Kris Richmond: We had another question come saying if a building two to four units of code violations and the owner started some repairs due to a court order, can they be reimbursed for those repairs they've already done? That's the first question. And the second is, can their property be expedited for review and approval due to a court order to make repairs, since it is a court order?

Les Warner: Well, let's deal with this in two segments. So when you're using the federal dollars, you're looking at that essentially in the GAP. So if that property owner has already completed those repairs, I would not see that as being ineligible for reimbursement since this is something that happened that has already been handled happen prior to your commitments of funding. Kris talked a little bit yesterday about the eligibility of pre-development funding and that's really in a very limited sense, for development projects where we're doing some of the legwork that has no implication under environmental review. So I would say that it is not going to be eligible to reimburse those out of pocket expenses that the owner has already put in.

As far as expediting that particular application because of this court order, that's something that you as part of your program design would have some criteria about. How do you determine in – in most of our programs, we're going to have more demand than we have funding available. And so as part of our funding process, we're going to make a determination on how we set priorities. Is it first come, first serve?

Have we set some specific priorities and we're going to sort of rate and rank these and say, okay, you've got a court order, you've got a lead poisoned child, you fit whatever our specific priority criteria would be. And so under that guidance, we're going to bump you up to the front of the crew. You need to have a – a transparent process that you're consistently applying. So that will be something that you would have to have built into your process to elevate or bump up that particular application in front of somebody else's. Kris, anything you want to add to that one?

Kris Richmond: No. We had another question come in saying we recently had a homeowner – so I did get confirmation it's homeowner rehab, receive a deferred payment loan and within several months after completion, the house was put up for sale and sold. The owner did pay the money back after the sale and they want to know if they should address it in their plan. I did let them know that the funds paid back to the PJ are considered program income, but I'm not quite sure which plan they're referring to. I was asking if they mean the caper for reporting the program income. Anything else you want to add about that? About reporting?

Les Warner: No. I mean, you've met the HOME program requirements since your affordability period is something that you imposed yourself as opposed to something that didn't complete it's HOME affordability period, which would have more ramifications. So I think I agree with Kris that our focus here then is making sure that, that money that's coming back is recognized as program income and treated appropriately.

Kris Richmond: Great. I'm looking through; I think we've answered all the questions that have come in so far today. So if you have other questions, please type them in the Q&A box. Les, anything else from yesterday we can cover?

Les Warner: I was looking at this question about TBRA.

Kris Richmond: Oh, they were asking about the exercise for question J, because we did say it's an eligible activity to fund a TBRA program. We can't use our CHDOs set aside funds. We use those regular HOME dollars that were on that sheet cake that you refer to everybody to. I think that's what they were asking about.

Les Warner: Okay. I think we generally covered the areas where we kind of commonly saw some questions coming through. I will just reiterate that what we have done in the first session, and we will, part of our second session, is laying out those program wide requirements. But once we – so all undertakings with HOME funds will have specific regulations that are going to apply that no matter what you're doing.

Once we get into CHDOs and then also our four eligible activities, in addition to those program wide regulation, then we have specific requirements that relate to that particular type of activity. And so our property standards are different, affordability periods, those sorts of things, are activity specific and just know that as we move forward, we'll be going into further detail on those things as we walk through the individual activities.

I think I we'll stay on the line for a few more minutes here and see if there are any additional questions coming through. I would suggest to folks if you have the opportunity to, in advance of next week's sections, look through those chapters. So we're going to be looking at general administration, we're also going to be looking at community housing development organizations. And you may find, particularly for folks that are newer to the program, it may help you to grasp all the information we're covering to review those chapters in advance. Then we'll cover them in a session and then have homework and an office hour that relate to those at the follow up.

Okay. I don't see anything else coming in, so I think unless something pops up in the next minute or so, I'm going to thank everybody for participating in the office hour session. And we'll look forward to working with you next week where we're going to be covering general administration and also our CHDO section. Thanks everybody.

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