

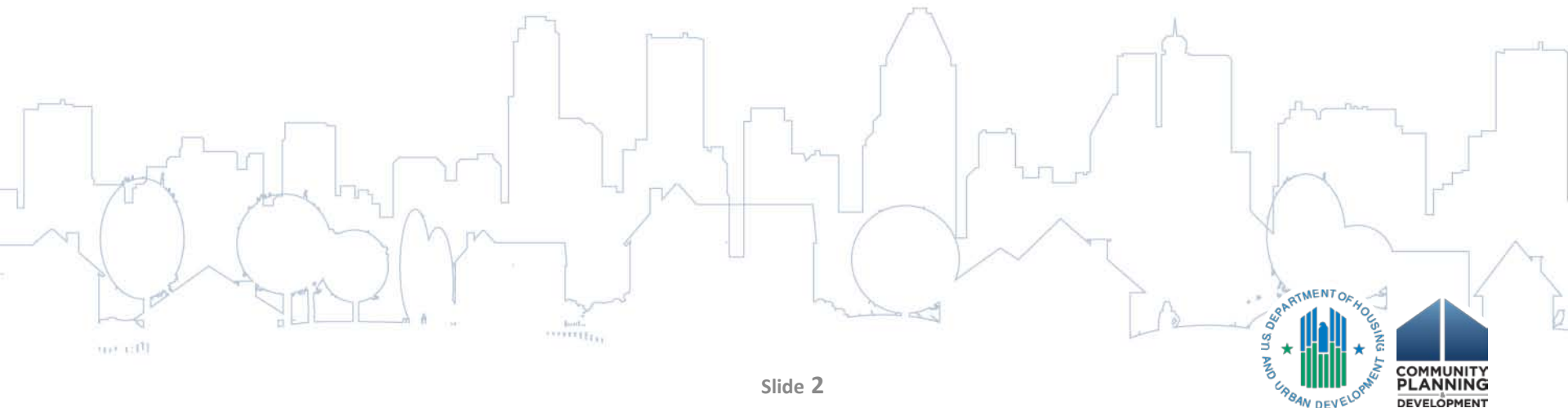


# Monitoring HOME



# A Little About Us...

- HUD's Community Planning and Development Training Initiative
- Course developed by HUD
- Who are we?



# How About You....

- Type of HOME organization:
  - State government
  - Local government
  - County government
  - Consortia
  - HUD
  - Other
- Size of HOME grant:
  - <\$1m
  - \$1-5m
  - >\$5m
- Years of HOME management experience:
  - ≤ 5 yr
  - 6-10 yr
  - > 10 yr

# Introductions

- Introduce yourself to others at your table
- Choose a spokesperson & scribe for each table (for discussions and exercises)
- Determine as a table:
  - Top 5 hot button monitoring topics
  - At least 2 tools needed to do monitoring better
- Report out to the group

# Training Goals

- Ask questions!
  - Amnesty from HUD in room
- Share advice, ideas and monitoring tools/techniques
- Develop outline of monitoring plan
- Formulate “to do” list



# Training Materials

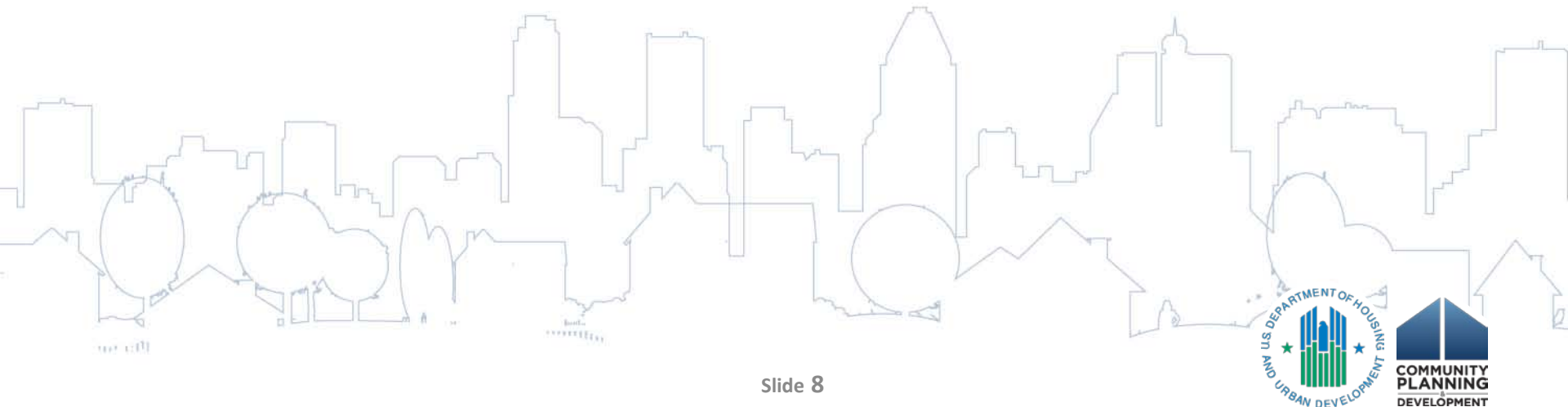
- Agenda
- PowerPoints
- Monitoring HOME Manual
  - Intro
  - Chapters 1-7
  - Appendix
- Exercises and Discussions
- Appendices
  - IDIS and HOME reports
  - List of HOME Publications

# Monitoring HOME Manual

- Updated in September 2010
- Includes checklists adopted from latest CPD Monitoring Checklists
  - <http://www.hud.gov/offices/cpd/library/monitoring/handbook.cfm>
- Helps PJ monitor
  - Understand monitoring purpose/process
  - Ensure partners are in compliance
- Covers some, but not all other federal requirements
  - See checklists on specific topics

# Course Agenda

- Organizing the Monitoring Process (Ch.1)
- Monitoring HOME Partners (Ch. 2)
- Monitoring Administrative and Finance Requirements (Ch.3)
- Monitoring Using IDIS and HOME Reports





# Course Agenda (cont)

- Monitoring HOME Activities (Ch.4-7)
  - Homeowner rehabilitation
  - Homebuyer
  - TBRA
  - Rental
- Analyzing and Implementing Monitoring Results (Ch. 1)

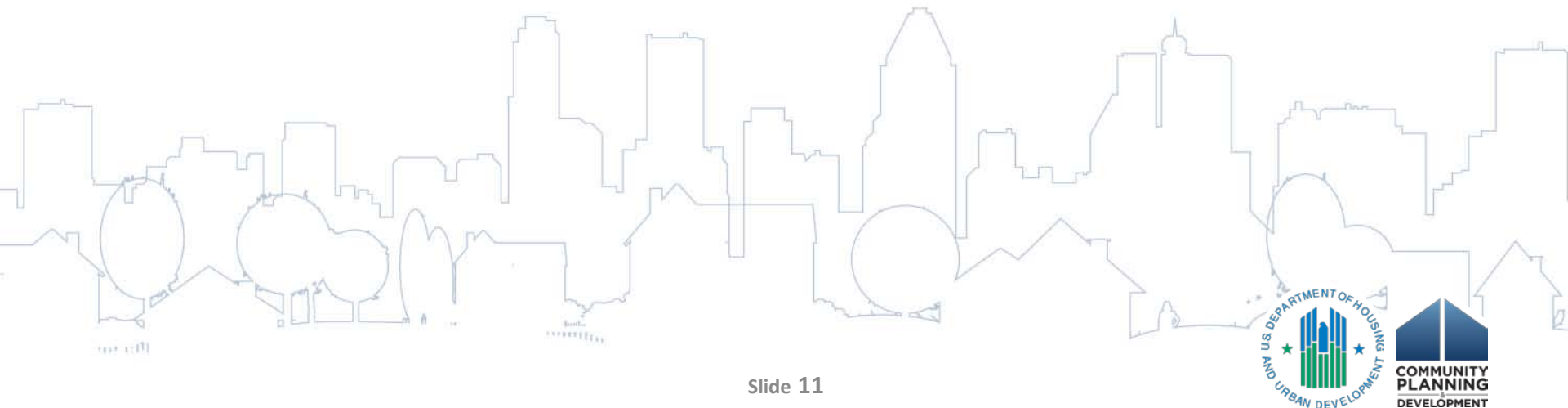
# Rules!!!!

- Ask questions
- Please keep side conversations to minimum
- Parking lot
- No cell phones that ring, please



# Logistics

- Timing of breaks and lunch
- Restrooms
- Hey, where's the coffee??



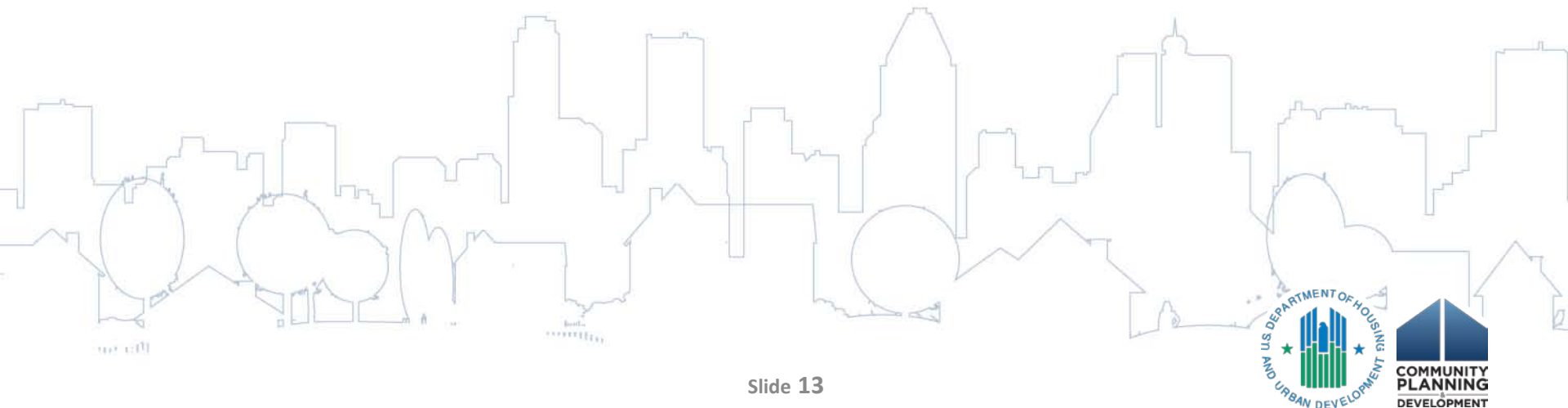


# **Organizing the Monitoring Process (Chapter 1)**



# Organizational Framework

- Section 1: Overall monitoring and planning
- Section 2: How to self monitor
- Section 3: How to monitor partners





# **Section 1: Overall Monitoring & Planning**



# Elements of Overall Monitoring & Planning

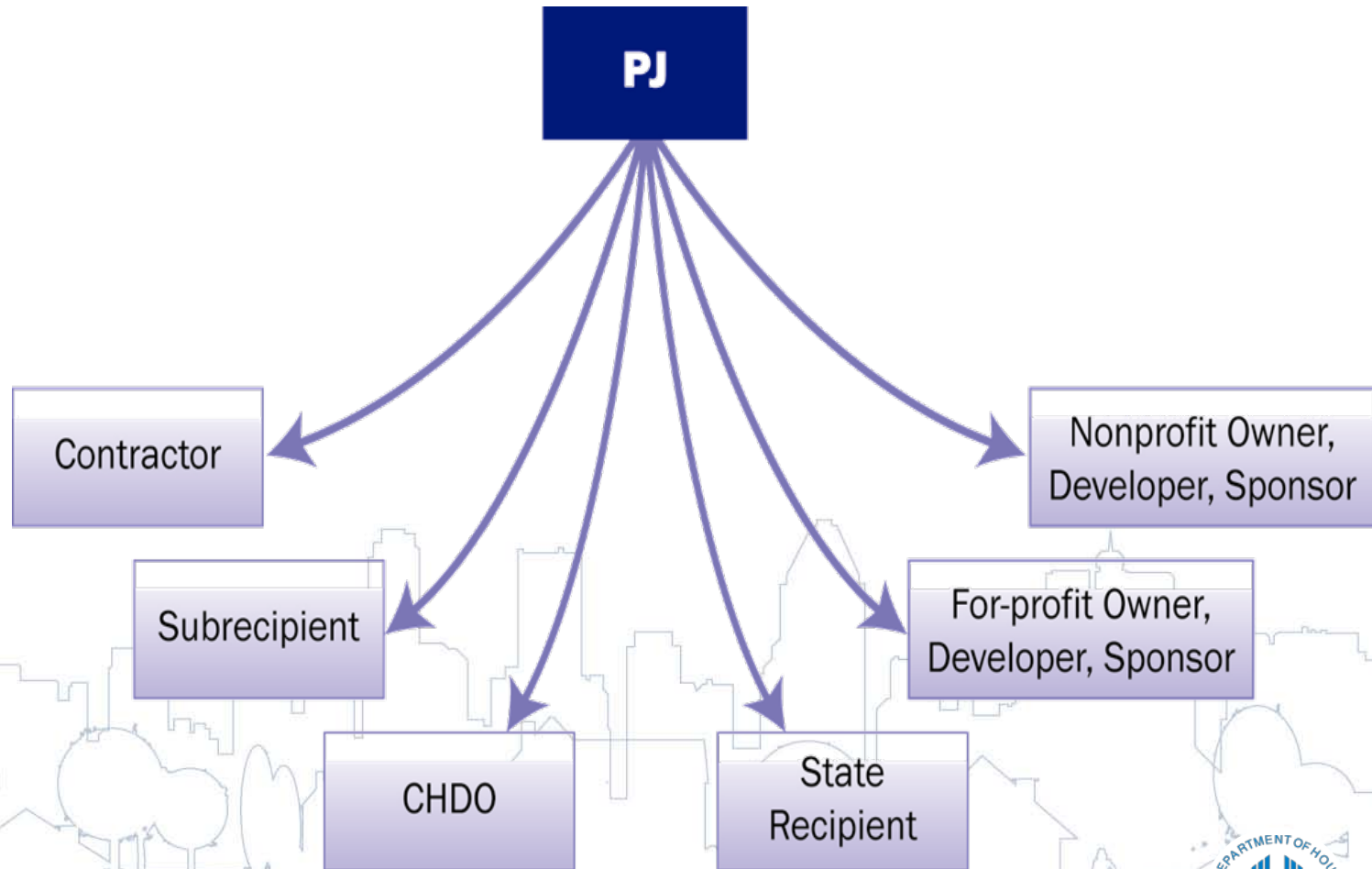
- Why must PJs monitor?
- Who does the PJ monitor?
- How often must PJs monitor?
- Who does the monitoring at the PJ?
- To what standards should PJs monitor?
- How can the PJ assess risk?
- What is in monitoring plan?

# Why Must PJs Monitor?

- Comply with legal requirements (24 CFR 92.504)
  - Ensure funds are spent on compliant programs and projects
- Improve program design and management
  - Identifies areas of program efficiency and effectiveness
- Evaluate performance
  - PJ performance is monitored by HUD
  - Oversight part of grant administration



# Who Does the PJ Monitor?



# How Often Must PJs Monitor?

- At least annually, required for
  - Subrecipients
  - State recipients
  - Consortia members
  - Contracted administrators
- CHDO requirements
  - At least each time funded
- Owners, developers and sponsors
  - At PJ discretion based on project size

# How Often Must PJs Monitor? (cont)

- Activity specific monitoring:
  - Homebuyer – check principal residence
    - More in Homebuyer
  - Rental – occupancy reports due to PJ, and unit inspections
    - More in Rental
  - TBRA – inspections of units
    - More in TBRA

# Who Does the Monitoring at the PJ?

- PJ's HOME Program office
  - Designated staff and/or division related to monitoring
- Separate monitoring department
  - Popular in large jurisdictions and states
- Contract out
  - Procure a contractor to monitor on behalf of the PJ

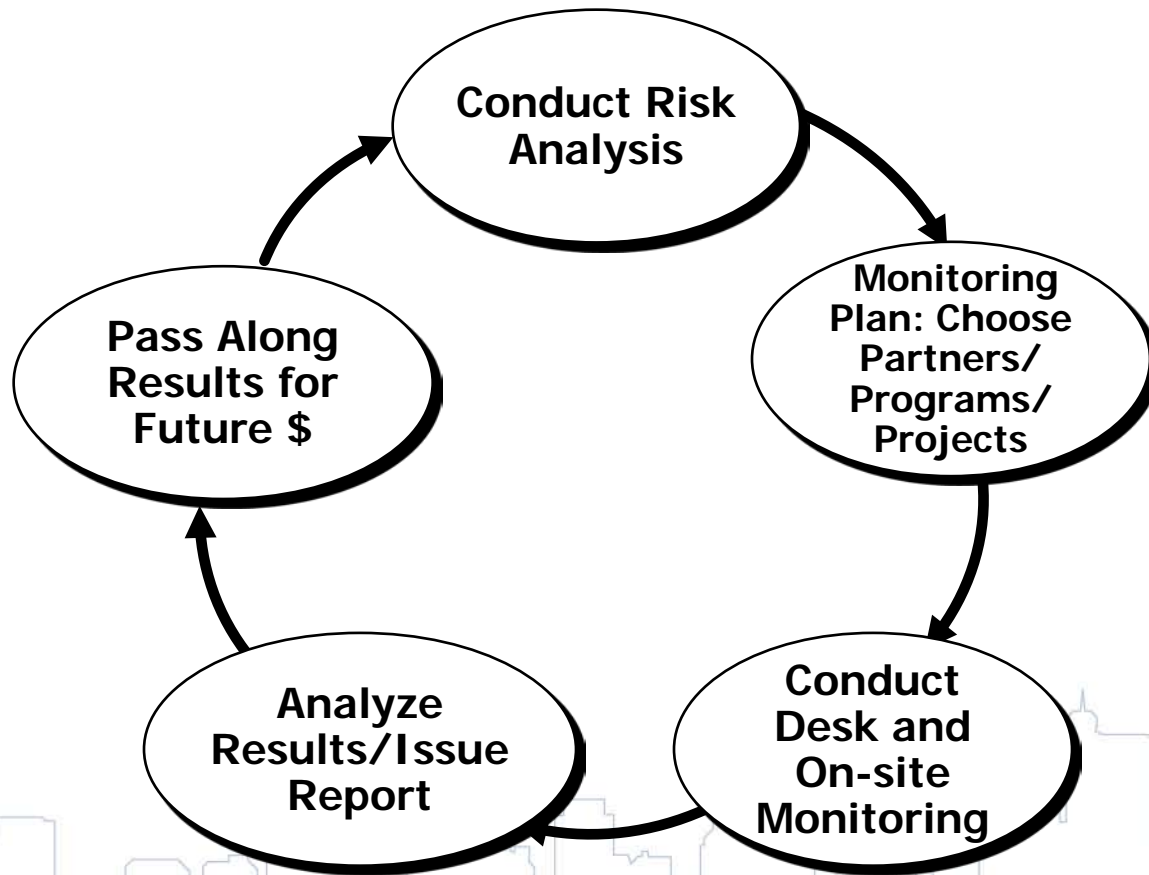
# Who Does the Monitoring at the PJ? (cont)

- Staffing for monitoring
  - Expertise in
    - HOME activity
    - Administrative or financial requirements
  - Objectivity of the monitor
    - Separate monitoring and funding function
  - Opportunities for collaboration
    - Tax credit agencies and/or other PJs
    - PJs cannot rely upon solely, must do own monitoring or contract

# To What Standards Should PJs Monitor?

- Consolidated Plan and Annual Action Plan
  - Needs of the community met
  - Strategies do address needs
- PJ policies, funding and application criteria
- Written agreements
  - Performance outputs (e.g., # of units) and outcomes
  - In compliance with requirements

# HOME Monitoring Life Cycle



# How Can the PJ Assess Risk?

- Conduct a risk analysis
  - Establishes a common protocol on which to review funded entities
  - Identifies risk areas and assigns weights to each
- For example:
  - HOME funds – larger amounts weighted more than smaller
  - Staff turnover – if true, could carry more weight on more stable organizations

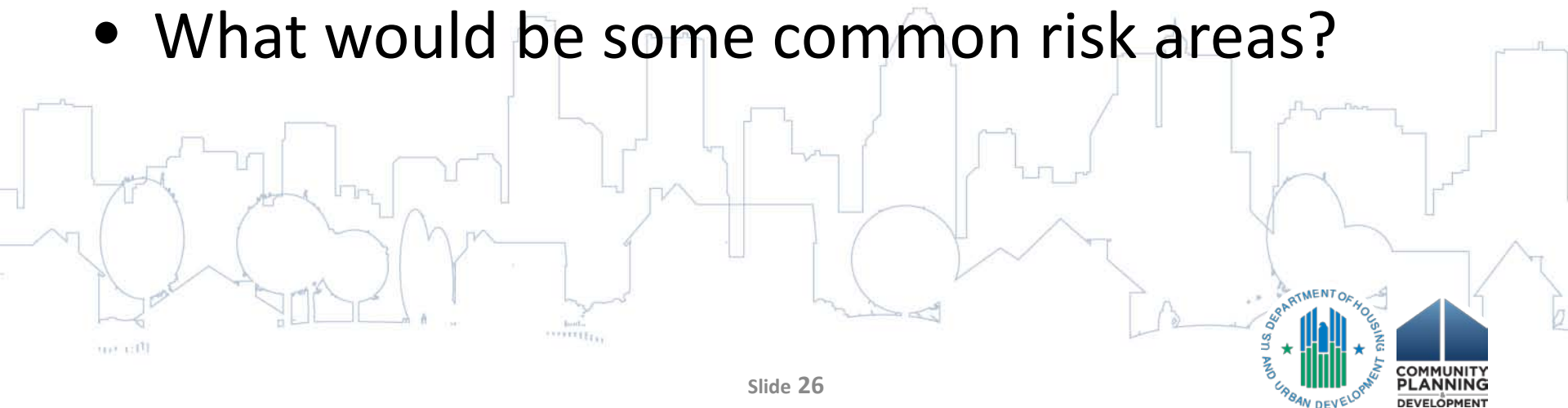


# Steps in a Risk Analysis

- Steps involved:
  - Determine risk factors
  - Assign weight to risk factors
  - Determine points for organization using each factor
  - Compile scores and rank organizations
  - Determine who and what to monitor based on score

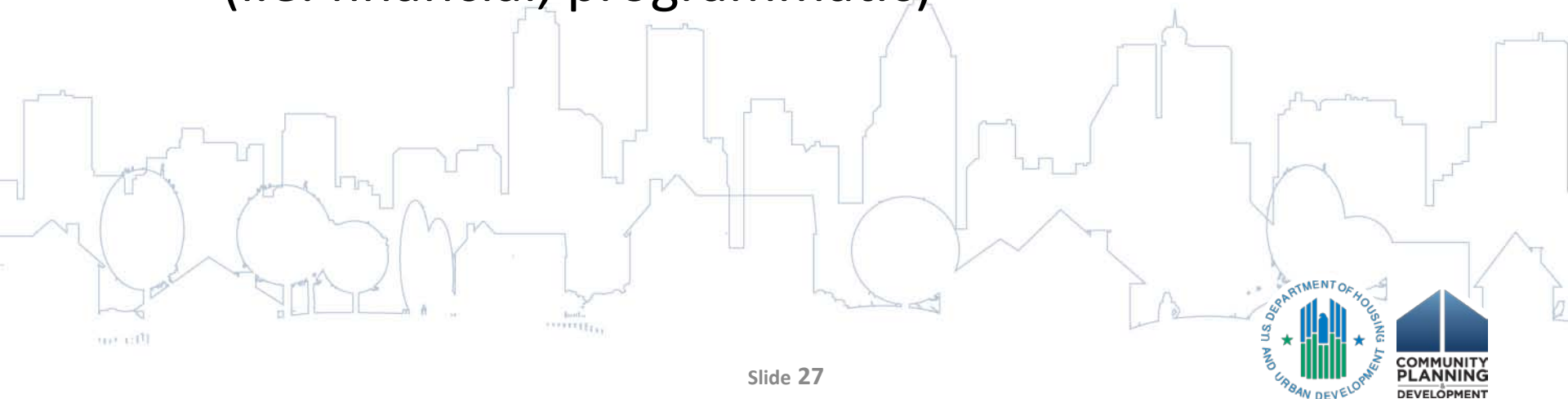
## How to Assess Risk?

- Sort yourself into at least two groups:
  - Large PJs (over \$3 million)
  - Small – Mid Size PJs (under \$3 million)
- When would it be beneficial to do a risk analysis, given funding level?
- What would be some common risk areas?



# Benefits to a Risk Analysis

- Benefits of conducting a risk assessment
  - Determines priorities for monitoring (i.e., who and what to monitor...when)
  - Allocates staff and resources appropriately
  - Determines what type of monitoring is necessary (i.e. financial, programmatic)



# What is an Annual Monitoring Plan?

- Describes who the PJ will monitor
  - Partners/Programs
- Provides annual monitoring priorities
- Outlines how monitoring will be conducted for that year
- Helps the PJ use its scarce resources more effectively and efficiently

# Common Sections of a Monitoring Plan

- Monitoring objectives
- Risk assessment process
- Monitoring schedule & process for:
  - Desk reviews
  - On-site monitoring
- Approaches and tools
- Staffing
- Follow-up activities

# How Good is Your Monitoring Plan

- Find the PJ monitoring plan you were asked to bring the following:
  - How old is your plan? Does it include the latest monitoring you are doing?
  - Does it appear to cover all your HOME activities? If not, what is missing?
- Make notes on what could be improved throughout the course



# Section 2: How to Self Monitor



# Elements of Self Monitoring

- Guidebook covers elements of both self monitoring (the PJ) and other administrators/partners
- PJs should monitor themselves as well as partners
  - PJs who administer programs themselves should
    - Review policies and procedures
    - Check sample files regularly



# Elements of Self Monitoring (cont)

- Areas to monitor:
  - Consolidated and annual action plan against HOME activities
  - Internal policies and procedures
  - IDIS and HOME reports
  - Program-wide requirements
    - Covered in management & administrative (Chapter 3)
  - Project requirements
    - Covered in activities (Chapters 4-7)

# Consolidated Plan and Annual Action Plan

- Three-five year Con Plan and Annual Action Plan
  - Do the needs and activities of the community match what the PJ is currently funding?
  - Are certifications in place for activities such as TBRA?
- Citizen participation
  - Is participation complete and documented?
    - Be aware of substantial amendments

# Policies and Procedures

- PJs must adopt some policies and procedures, regardless if administering program or not, including:
  - Subsidy layering
  - Resale/recapture
  - Written rehabilitation standard
  - Definition of income
  - Affirmative marketing
  - MWBE
- In addition, several other written policies are needed to ensure a compliant HOME program
  - See next few slides

# Key Policies and Procedures

## Defining Assistance

- Levels of Assistance
- Subsidy Layering
- Forms of Assistance
- Match
- Affordability/ Targeting

## Property/Construction

- Codes & Standards
- Lead-Based Paint
- Environmental Reviews
- Labor

## Beneficiary Issues

- Definitions of Income
- Relocation
- Lease Provisions

## Cost & Financial Mgmt

- Eligible costs
- Cost Principles
- Uniform Admin
- Disbursement
- Program Income
- Recaptured Funds
- Audits

# Key Policies and Procedures (cont)

## **FH and EO**

- Affirmative Marketing
- MBE/WBE Outreach
- Section 3

## **Competition**

- Conflict of Interest
- Procurement
- Contractors
- Lobbying Disclosure

## **General Administrative**

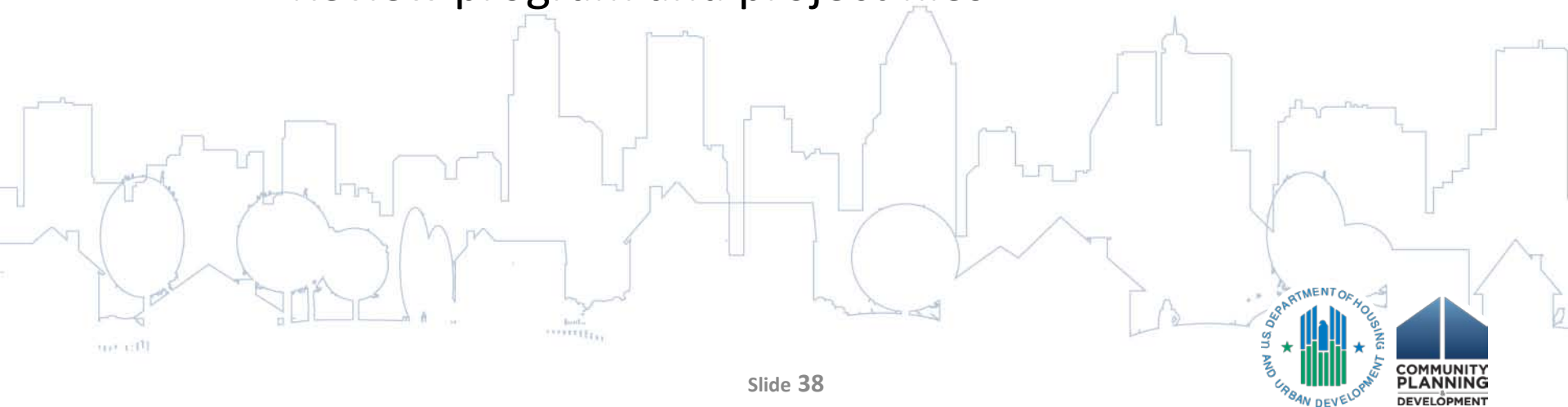
- Travel
- Drug free workplace
- Fair employment
- Labor
- Program access

## **Requirements in Other Chaps**

- Citizen Participation
- Written Agreements
- Recordkeeping
- Monitoring Plan

# Policies and Procedures

- Areas to monitor:
  - Are there procedures in place for all required elements?
  - Are the procedures passed along to partners?
    - Check partner policies and procedures
    - Review program and project files



# IDIS and HOME Reports

- Use reports to:
  - Pinpoint potential compliance issues
    - Within the PJ
    - Outside of the PJ with a partner
  - Identify other performance issues
    - Incomplete activities?
    - Stalled activities?
    - Potential compliance issues such as deadlines not being met?

# IDIS and HOME Reports (cont)

- IDIS Reports
  - PR27 (Status of HOME Grants)
  - PR25 (Status of CHDO Funds by Fiscal Year)
  - PR22 (Status of HOME Activities)
- HOME Reports
  - Open Activities
  - Deadline Compliance Status Report
  - Vacant Units
  - SNAPSHOT
  - Expiring Funds



# PR 27 Report: Status of HOME Funds

- Areas to monitor:
  - Status of commitments
    - Check % committed
  - Program income—Do you have it?
    - Should be 100% disbursed
  - CHDO reservations
    - Reserved must total at least 15%
  - HOME project commitments to disbursements
    - Check to ensure totals match
  - Administrative funds
    - If not disbursed, de-reserve to free funds for activities

# PR 27 Report: Status of HOME Funds (cont)

- Areas to monitor (cont):
  - CHDO operating funds
    - De-reserve amounts not disbursed
  - CHDO reservations and projects
    - Amount reserved = amount committed = amount disbursed for completed projects
    - De-reserve amounts not disbursed
  - Subfunds
    - De-reserve amounts not disbursed

# PR 27 Report

## PR27 - Commitments from Authorized Funds

REPORT FILTER:

(A) Fiscal Year	(B) Total Authorization	(C) Admin/OP Reservation	(E) Amount Reserved to CHDOS	(F) % CHDO Rsvd	(G) Reservations to Other Entities	(H) PJ Committed to Activities	(I) Total Authorized Commitments	(K) % of Auth Cmtd
1994	\$500,000.00	\$50,000.00	\$75,000.00	15.0%	\$0.00	\$375,000.00	\$450,000.00	100.0%
1995	\$399,000.00	\$59,850.00	\$59,850.00	15.0%	\$0.00	\$279,300.00	\$339,150.00	100.0%
1996	\$403,000.00	\$60,450.00	\$60,450.00	15.0%	\$0.00	\$282,100.00	\$342,550.00	100.0%
1997	\$393,000.00	\$56,248.00	\$58,950.00	15.0%	\$0.00	\$277,802.00	\$336,752.00	100.0%
1998	\$414,000.00	\$62,050.00	\$62,100.00	15.0%	\$0.00	\$289,850.00	\$351,950.00	100.0%
1999	\$447,000.00	\$69,861.00	\$195,815.00	43.8%	\$0.00	\$181,324.00	\$377,139.00	100.0%
2000	\$449,000.00	\$67,300.00	\$67,350.00	15.0%	\$0.00	\$314,350.00	\$381,700.00	100.0%
2001	\$497,000.00	\$49,700.00	\$0.00	0.0%	\$0.00	\$447,300.00	\$447,300.00	100.0%
2002	\$497,000.00	\$74,550.00	\$74,550.00	15.0%	\$0.00	\$347,900.00	\$422,450.00	100.0%
2003	\$603,748.00	\$84,311.80	\$89,915.06	14.9%	\$0.00	\$429,521.14	\$519,436.20	100.0%
2004	\$689,007.00	\$64,391.10	\$300,000.00	43.5%	\$0.00	\$324,615.90	\$624,615.90	100.0%
2005	\$597,872.00	\$85,809.90	\$85,809.90	14.4%	\$0.00	\$426,252.20	\$512,062.10	100.0%
2006	\$553,312.00	\$67,411.34	\$240,000.00	43.4%	\$0.00	\$245,900.66	\$485,900.66	100.0%
2007	\$547,639.00	\$79,881.75	\$153,179.59	28.0%	\$0.00	\$314,577.66	\$467,757.25	100.0%
2008	\$521,413.00	\$77,434.35	\$77,434.35	14.9%	\$0.00	\$366,544.30	\$443,978.65	100.0%
2009	\$574,277.00	\$57,427.70	\$86,141.55	15.0%	\$0.00	\$58,106.09	\$144,247.64	35.1%
<b>Total</b>	<b>\$8,086,268.00</b>	<b>\$1,066,676.94</b>	<b>\$1,686,545.45</b>	<b>20.9%</b>	<b>\$0.00</b>	<b>\$4,960,443.95</b>	<b>\$6,646,989.40</b>	<b>95.4%</b>

# PR 25 Report: Status of CHDO Funds By Fiscal Yr

- Areas to monitor:
  - Activities 100%:
    - Reserved
    - Committed, and
    - Disbursed
  - If not 100%, what is the current status of the activity?
  - Are activities stalled? Why and what can be done about them?

# PR 25 Report

## PR25 - CHDO Reservations

REPORT FILTER:

Fiscal Year	CHDO Name	Fund Type	Amount Reserved	Amount Committed	Balance to Commit	% Committed Reserved	Amount Disbursed	% Disbursed Committed
1992	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$304,500.00	\$304,500.00	\$0.00	100.0%	\$304,500.00	100.0%
	Fund Type Total for 1992	CR	\$304,500.00	\$304,500.00	\$0.00	100.0%	\$304,500.00	100.0%
	Total for 1992		\$304,500.00	\$304,500.00	\$0.00	100.0%	\$304,500.00	1
1993	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$200,400.00	\$200,400.00	\$0.00	100.0%	\$200,400.00	100.0%
	Fund Type Total for 1993	CR	\$200,400.00	\$200,400.00	\$0.00	100.0%	\$200,400.00	100.0%
	Total for 1993		\$200,400.00	\$200,400.00	\$0.00	100.0%	\$200,400.00	1
1994	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$258,300.00	\$258,300.00	\$0.00	100.0%	\$258,300.00	100.0%
	Fund Type Total for 1994	CR	\$258,300.00	\$258,300.00	\$0.00	100.0%	\$258,300.00	100.0%
	Total for 1994		\$258,300.00	\$258,300.00	\$0.00	100.0%	\$258,300.00	1
1995	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$282,750.00	\$282,750.00	\$0.00	100.0%	\$282,750.00	100.0%
	Fund Type Total for 1995	CR	\$282,750.00	\$282,750.00	\$0.00	100.0%	\$282,750.00	100.0%
	Total for 1995		\$282,750.00	\$282,750.00	\$0.00	100.0%	\$282,750.00	1
1996	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$286,650.00	\$286,650.00	\$0.00	100.0%	\$286,650.00	100.0%
	Fund Type Total for 1996	CR	\$286,650.00	\$286,650.00	\$0.00	100.0%	\$286,650.00	100.0%
	Total for 1996		\$286,650.00	\$286,650.00	\$0.00	100.0%	\$286,650.00	1
1997	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$279,750.00	\$279,750.00	\$0.00	100.0%	\$279,750.00	100.0%
	Fund Type Total for 1997	CR	\$279,750.00	\$279,750.00	\$0.00	100.0%	\$279,750.00	100.0%
	Total for 1997		\$279,750.00	\$279,750.00	\$0.00	100.0%	\$279,750.00	1
1998	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$298,800.00	\$298,800.00	\$0.00	100.0%	\$298,800.00	100.0%
	Fund Type Total for 1998	CR	\$298,800.00	\$298,800.00	\$0.00	100.0%	\$298,800.00	100.0%
	Total for 1998		\$298,800.00	\$298,800.00	\$0.00	100.0%	\$298,800.00	1
1999	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$323,250.00	\$323,250.00	\$0.00	100.0%	\$323,250.00	100.0%
	Fund Type Total for 1999	CR	\$323,250.00	\$323,250.00	\$0.00	100.0%	\$323,250.00	100.0%
	Total for 1999		\$323,250.00	\$323,250.00	\$0.00	100.0%	\$323,250.00	1
2000	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$324,150.00	\$324,150.00	\$0.00	100.0%	\$324,150.00	100.0%
	Fund Type Total for 2000	CR	\$324,150.00	\$324,150.00	\$0.00	100.0%	\$324,150.00	100.0%
	Total for 2000		\$324,150.00	\$324,150.00	\$0.00	100.0%	\$324,150.00	1
2001	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$359,850.00	\$359,850.00	\$0.00	100.0%	\$359,850.00	100.0%
	Fund Type Total for 2001	CR	\$359,850.00	\$359,850.00	\$0.00	100.0%	\$359,850.00	100.0%
	Total for 2001		\$359,850.00	\$359,850.00	\$0.00	100.0%	\$359,850.00	1
2002	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$358,950.00	\$358,950.00	\$0.00	100.0%	\$358,950.00	100.0%
	Fund Type Total for 2002	CR	\$358,950.00	\$358,950.00	\$0.00	100.0%	\$358,950.00	100.0%
	Total for 2002		\$358,950.00	\$358,950.00	\$0.00	100.0%	\$358,950.00	1
2003	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$391,379.55	\$391,379.55	\$0.00	100.0%	\$391,379.55	100.0%
	Fund Type Total for 2003	CR	\$391,379.55	\$391,379.55	\$0.00	100.0%	\$391,379.55	100.0%
	Total for 2003		\$391,379.55	\$391,379.55	\$0.00	100.0%	\$391,379.55	1
2004	GREATER ANYTOWN HOUSING PARTNERSHIP	CO	\$0.00	\$0.00	\$0.00		\$0.00	
	SAVMILL COMMUNITY LAND TRUST	CR	\$23,301.98	\$23,301.98	\$0.00	100.0%	\$23,301.98	100.0%
		CO	\$0.00	\$0.00	\$0.00		\$0.00	
		CR	\$367,030.87	\$367,030.87	\$0.00	100.0%	\$367,030.87	100.0%
		CO	\$0.00	\$0.00	\$0.00		\$0.00	
	Fund Type Total for 2004	CR	\$390,332.85	\$390,332.85	\$0.00	100.0%	\$390,332.85	100.0%
2005	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$390,332.85	\$390,332.85	\$0.00	100.0%	\$390,332.85	1
	SAVMILL COMMUNITY LAND TRUST	CR	\$200,000.00	\$200,000.00	\$0.00	100.0%	\$200,000.00	100.0%
	Fund Type Total for 2005	CR	\$172,319.65	\$172,319.65	\$0.00	100.0%	\$172,319.65	100.0%
2006	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$172,319.65	\$172,319.65	\$0.00	100.0%	\$172,319.65	100.0%
	SAVMILL COMMUNITY LAND TRUST	CR	\$154,025.35	\$154,025.35	\$0.00	100.0%	\$11,596.00	7.5%
	Fund Type Total for 2006	CR	\$196,163.00	\$196,163.00	\$0.00	100.0%	\$196,163.00	100.0%
2007	GREATER ANYTOWN HOUSING PARTNERSHIP	CR	\$350,188.35	\$350,188.35	\$0.00	100.0%	\$207,759.00	59.3%
	SAVMILL COMMUNITY LAND TRUST	CR	\$159,554.00	\$159,554.00	\$146,521.35	7.6%	\$0.00	0.0%
	Fund Type Total for 2007	CR	\$188,553.65	\$188,553.65	\$4,669.35	97.5%	\$136,440.75	74.2%
Total for All Years		CR	\$47,107.65	\$195,917.35	\$151,169.70	96.4%	\$136,440.75	69.6%
		CO	\$0.00	\$0.00	\$0.00		\$0.00	
	Grand Total	CR	\$5,128,678.05	\$4,977,488.35	\$151,169.70	97.1%	\$4,775,581.80	95.9%



# PR 22 Report/Open Activities

- Open Activities is a monthly version of PR22
- Areas to monitor:
  - Are committed projects 100% drawn down?
  - Have completion reports been done in a timely fashion?
    - Look for final draws (“FD”) over 120 days
  - If not 100% drawn, does the project seem stalled?
    - Status date more than 6 months

# PR 22 Report

## PR22 - Status of HOME Activities - Entitlement

REPORT FILTER:

Page by:

Grantee - Subgrantor State - Non-State: Entitlement

Activity Type	IDIS Activity	Activity Address	Activity Status	Status Date	Tot, US Units	Home Units	Commit Date	Committed Amount	Drawn Amount	PCT
NEW CONSTRUCTION	535	1054 CONGRESS STREET , Any To	Completed	09/02/97	1	1	10/09/96	\$14,616.00	\$14,616.00	100.00%
	536	166 KENNEDY STREET , Any Town	Completed	07/08/99	1	1	10/09/96	\$13,692.00	\$13,692.00	100.00%
	537	1164 ST MADER STREET , Any Tow	Completed	07/07/99	1	1	10/09/96	\$13,830.00	\$13,830.00	100.00%
	538	1351 PECAN STREET , Any Town , L	Completed	07/08/99	1	1	10/09/96	\$13,650.00	\$13,650.00	100.00%
	730	CHDO OPERATION COSTS , Any Tc	Completed	07/08/99	10	1	05/01/96	\$23,763.86	\$23,763.86	100.00%
	737	151 S. CLAIBORNE ST. , Any Town ,	Completed	08/11/99	1	1	05/01/97	\$107,356.61	\$107,356.61	100.00%
	814	304 KENNEDY ST. , Any Town , US	Completed	07/08/99	1	1	10/30/97	\$9,460.00	\$9,460.00	100.00%
	815	210 GASTON ST. , Any Town , US	Completed	07/08/99	1	1	10/30/97	\$7,974.91	\$7,974.91	100.00%
	816	1206 HERCULES ST. MLK AVENUE I	Completed	07/08/99	1	1	11/05/95	\$7,993.20	\$7,993.20	100.00%
	848	404 C. USHOLN ST. , Any Town , US	Completed	07/08/99	1	1	02/02/98	\$56,096.66	\$56,096.66	100.00%
	859	1251 MLK AVENUE , Any Town , US	Completed	02/15/02	1	1	04/01/98	\$45,900.00	\$45,900.00	100.00%
	895	218 KENNEDY ST. , Any Town , US	Completed	06/30/03	1	1	06/17/98	\$30,222.00	\$30,222.00	100.00%
	899	1019 CONGRESS STREET , Any To	Completed	08/11/99	1	1	06/22/98	\$38,190.00	\$38,190.00	100.00%
	934	1150 BASIL ST. MLK AVENUE REDE	Completed	08/11/99	1	1	07/16/98	\$33,990.00	\$33,990.00	100.00%
	935	1005 CONGRESS ST. , Any Town , L	Completed	08/11/99	1	1	07/16/98	\$47,650.00	\$47,650.00	100.00%
	947	250 PINE STREET , Any Town , US	Completed	08/12/99	1	1	07/30/98	\$72,061.00	\$72,061.00	100.00%
	987	1001 CONGRESS STREET , Any To	Completed	08/12/99	1	1	09/04/98	\$57,260.00	\$57,260.00	100.00%
	990	209 KENNEDY STREET , Any Town	Completed	06/30/03	1	1	05/01/98	\$19,548.00	\$19,548.00	100.00%
	1020	FIRST AVE & RUBY STREET F.D. RI	Cancelled	12/09/04	0	0	01/00/00	\$0.00	\$0.00	0.00%
	1021	219 KENNEDY STREET MLK REDEV	Cancelled	02/15/02	0	0	01/00/00	\$0.00	\$0.00	0.00%
	1054	251 LOCUST STREET , Any Town , L	Completed	08/12/99	1	1	12/29/98	\$44,418.00	\$44,418.00	100.00%
	1058	1215 HERCULES STREET , Any Tow	Completed	07/08/99	1	1	01/06/99	\$29,759.00	\$29,759.00	100.00%
	1082	1154 , Any Town , US	Completed	08/12/99	1	1	02/09/99	\$55,040.00	\$55,040.00	100.00%
	1134	TRINITY GARDENS AREA , Any Tow	Completed	07/08/99	4	1	05/01/99	\$16,820.00	\$16,820.00	100.00%
	1140	RICHARDSON WAY , Any Town , US	Completed	02/03/06	1	1	05/28/99	\$142,570.20	\$142,570.20	100.00%
	1144		Cancelled	10/21/05	0	0	01/00/00	\$0.00	\$0.00	0.00%
	1314	1204 DR. MARTIN L KING JR. AVENI	Cancelled	02/22/02	0	1	04/28/00	\$0.00	\$0.00	0.00%
	1316	951 ADAMS STREET MLK AVENUE I	Cancelled	02/18/02	0	0	01/00/00	\$0.00	\$0.00	0.00%
	1321	1701 RICHARDSON DRIVE , Any To	Completed	02/18/02	1	1	05/25/00	\$27,000.00	\$27,000.00	100.00%
	1322	1705 RICHARDSON DRIVE , Any To	Completed	02/20/02	1	1	05/25/00	\$51,428.00	\$51,428.00	100.00%
	1323	1709 RICHARDSON DRIVE , Any To	Completed	02/20/02	1	1	05/25/00	\$23,920.00	\$23,920.00	100.00%
	1324	1713 RICHARDSON DRIVE , Any To	Completed	02/20/02	1	1	05/25/00	\$34,500.00	\$34,500.00	100.00%
	1552	RICHARDSON HEIGHTS , Any Town	Completed	02/20/02	1	1	02/14/01	\$21,827.70	\$21,827.70	100.00%



# Open Activities Report

FIELD OFFICE	PJ	ST	ACT ID	ACT_NUM	PGM YR	PROJ ID	TENURE TYPE	SETUP TYPE	ACT_CI TY	ST	AZIP	HOME UNITS	FUNDING DATE	FUNDED AMOUNT	DRAWN AMOUNT	PCT DRW	LAST DRW DATE	DRAW DAYS	FT	*ST CD	RECIPIENT UNDERTAKING ACTIVITY	RECIPIENT CITY	ST	NUM	GRANTEE ID
			1643		2000	2	HOMEBUYER	ACQ NCO				10	05/08/2003	150,714.97	150,714.97	100.0	05/29/2003	1,859	EN	FD				1	10404
			1662		2001	2	HOMEBUYER	NCO				1	07/21/2003	75,037.90	32,067.38	42.7	02/27/2007	489	EN	OP				2	10404
			1867		2004	2	HOMEBUYER	ACQ NCO				1	08/24/2004	959,076.78	959,076.78	100.0	06/25/2008	5	EN	FD				3	10404
			1955		2004	2	HOMEBUYER	NCO				1	02/08/2005	76,308.50	40,832.89	53.6	02/27/2007	489	EN	OP				4	10404
			1999		2004	2	HOMEBUYER	NCO				0	07/06/2005	226,852.00	225,077.00	99.2	06/30/2008	731	EN	OP				5	10404
			2033		2004	2	RENTAL	ACQ REH				1	08/16/2005	18,948.92	18,948.92	100.0	08/23/2005	1,042	CR	FD				6	10404
			2073		2003	2	HOMEOWNER	REHAB				0	12/02/2005	10,000.00	0.00	0.0	///	0	EN	OP				7	10404
			2085		2004	2	HOMEOWNER	REHAB				1	12/23/2005	2,976.00	0.00	0.0	///	0	EN	OP				8	10404
			2099	UC0412	2004	2	HOMEOWNER	REHAB				0	02/02/2006	56,041.89	0.00	0.0	///	0	EN	OP				9	10404
			2102	CM0408	2004	2	HOMEOWNER	REHAB				1	02/07/2006	26,858.68	0.00	0.0	///	0	EN	OP				10	10404
			2104		2005	2	HOMEBUYER	ACQ NCO				0	02/22/2006	53,556.00	53,556.00	100.0	03/28/2006	825	EN	FD				11	10404
			2105	UC0305	2003	2	HOMEOWNER	REHAB				1	02/24/2006	40,805.00	0.00	0.0	///	0	EN	OP				12	10404
			2119	UC0514	2005	2	HOMEOWNER	REHAB				0	03/22/2006	36,285.00	27,162.00	74.8	06/15/2008	746	EN	OP				13	10404
			2125	CM0505	2005	2	HOMEBUYER	ACQ NCO				0	04/21/2006	89,158.13	89,140.73	100.0	05/12/2008	780	EN	FD				14	10404
			2128	UC0509	2005	2	HOMEBUYER	ACQ REH				0	04/25/2006	35,000.00	0.00	0.0	///	0	EN	OP				15	10404
			2136	UC0305	2003	2	HOMEOWNER	REHAB				0	05/05/2006	0.00	0.00	0.0	///	0	EN	OP				16	10404
			2147	UC0407	2005	2	HOMEBUYER	NCO				1	05/23/2006	9,236.00	4,272.21	46.3	11/29/2008	579	EN	OP				17	10404
			2168	CM0401	2004	2	HOMEOWNER	REHAB				1	06/29/2006	63,738.36	0.00	0.0	///	0	EN	OP				18	10404
			2171	CM0401	2004	2	HOMEOWNER	REHAB				1	06/29/2006	75,000.00	0.00	0.0	///	0	EN	OP				19	10404
			2180	ADDI0302	2003	2	HOMEBUYER	ACQ				1	07/17/2006	10,000.00	0.00	0.0	///	0	EN	OP				20	10404
			2229	CM0508	2005	2	HOMEOWNER	REHAB				1	08/23/2006	5,274.69	0.00	0.0	///	0	EN	OP				21	10404
			2238	UC0509	2006	3	HOMEOWNER	REHAB				1	09/14/2006	35,000.00	33,002.91	94.3	06/14/2007	382	EN	OP				22	10404
			2242	CM0505	2005	2	HOMEBUYER	ACQ REH				1	09/29/2006	29,850.00	25,000.00	83.8	11/16/2008	562	EN	OP				23	10404
			2246	CM0505	2005	2	HOMEBUYER	ACQ REH				1	09/29/2006	28,050.00	19,000.00	67.7	11/16/2008	562	EN	OP				24	10404
			2248	CM0508	2005	2	HOMEOWNER	REHAB				1	10/03/2006	41,214.31	0.00	0.0	///	0	EN	OP				25	10404
			2254	UC0505	2005	2	HOMEOWNER	REHAB				0	10/24/2006	50,000.00	0.00	0.0	///	0	EN	OP				26	10404
			2257	ADDI0301	2003	2	HOMEBUYER	ACQ				1	10/25/2006	10,000.00	0.00	0.0	///	0	EN	OP				27	10404
			2259	CM0403 & CM0603	2004	2	HOMEBUYER	ACQ NCO				4	10/31/2006	468,427.00	432,386.97	92.7	02/27/2007	489	EN	OP				28	10404
			2281	CM0503	2004	2	HOMEBUYER	ACQ NCO				0	10/31/2006	52,725.43	0.00	0.0	///	0	EN	OP				29	10404
			2288	CM0608	2006	3	HOMEBUYER	ACQ				0	11/08/2006	23,407.00	0.00	0.0	///	0	EN	OP				30	10404
			2281	UC0509	2005	2	HOMEOWNER	REHAB				0	12/07/2006	35,000.00	0.00	0.0	///	0	EN	OP				31	10404
			2285	UC0509	2005	2	HOMEOWNER	REHAB				1	12/14/2006	35,000.00	0.00	0.0	///	0	EN	OP				32	10404
			2286	UC0509	2005	2	HOMEOWNER	REHAB				0	12/14/2006	0.00	0.00	0.0	///	0	EN	OP				33	10404
			2295	ADDI0305	2003	2	HOMEBUYER	ACQ				0	01/02/2007	6,600.00	6,600.00	100.0	11/09/2007	234	EN	FD				34	10404
			2300	CM0608	2006	3	HOMEBUYER	ACQ				0	01/04/2007	60,000.00	0.00	0.0	///	0	EN	OP				35	10404
			2301	UC0505	2005	2	HOMEOWNER	REHAB				1	01/05/2007	50,000.00	49,907.24	99.8	05/13/2008	48	EN	OP				36	10404
			2307	CM0503	2005	2	HOMEOWNER	REHAB				0	01/19/2007	25,000.00	0.00	0.0	///	0	EN	OP				37	10404
			2308	CM0503	2005	2	HOMEOWNER	REHAB				0	01/19/2007	120,000.00	0.00	0.0	///	0	EN	OP				38	10404
			2309	CM0503	2005	2	HOMEOWNER	REHAB				0	01/19/2007	45,000.00	0.00	0.0	///	0	EN	OP				39	10404
			2311	CM0401	2004	2	HOMEOWNER	REHAB				1	01/26/2007	75,000.00	0.00	0.0	///	0	EN	OP				40	10404
			2312	CM0501	2005	2	HOMEOWNER	REHAB				1	01/26/2007	75,000.00	0.00	0.0	///	0	EN	OP				41	10404
			2313	CM0501	2005	2	HOMEOWNER	REHAB				1	01/26/2007	57,167.00	0.00	0.0	///	0	EN	OP				42	10404
			2324	CM0607	2006	3	HOMEBUYER	ACQ REH				0	02/15/2007	98,118.00	98,118.00	100.0	10/18/2007	256	EN	FD				43	10404
			2325	UC0612	2006	3	HOMEOWNER	REHAB				1	02/23/2007	34,818.00	0.00	0.0	///	0	EN	OP				44	10404
			2326	UC0612	2006	3	HOMEOWNER	REHAB				0	02/23/2007	28,843.00	0.00	0.0	///	0	EN	OP				45	10404
			2327	UC0612	2006	3	HOMEOWNER	REHAB				0	02/23/2007	32,518.00	0.00	0.0	///	0	EN	OP				46	10404
			2330	UC0509	2005	2	HOMEOWNER	REHAB				0	03/12/2007	0.00	0.00	0.0	///	0	EN	OP				47	10404
			2331	CM0505	2005	2	HOMEBUYER	ACQ REH				1	03/14/2007	29,250.00	29,250.00	100.0	01/17/2008	165	EN	FD				48	10404
			2341	CM0607	2006	3	HOMEBUYER	ACQ REH				1	04/09/2007	161,489.00	161,489.00	100.0	11/21/2007	222	EN	FD				49	10404
			2344	ADDI0305/0405	2003	2	HOMEBUYER	ACQ REH				0	04/12/2007	6,600.00	6,600.00	100.0	11/21/2007	222	EN	FD				50	10404
			2348	UC0614	2006	3	HOMEOWNER	REHAB				1	05/10/2007	27,734.00	27,734.00	100.0	10/24/2007	250	EN	FD				51	10404
			2353	CM0503 & CM0603	2005	2	HOMEBUYER	ACQ NCO				1	05/15/2007	52,320.61	52,319.61	100.0	07/20/2007	346	EN	FD				52	10404
			2354	ADDI0307/ADDI0407	2003	2	HOMEBUYER	ACQ				1	06/05/2007	10,000.00	10,000.00	100.0	10/18/2007	256	EN	FD				53	10404
			2355	ADDI0407/ADDI0507	2004	2	HOMEBUYER	ACQ				1	06/05/2007	10,000.00	10,000.00	100.0	10/18/2007	256	EN	FD				54	10404
			2357	CHDO 0606/0706	2006	3	HOMEBUYER	ACQ REH				1	06/06/2007	50,000.00	50,000.00	100.0	11/09/2007	234	CR	FD				55	10404
			2358	CHDO 0606/0706	2006	3	HOMEBUYER	ACQ REH				0	06/06/2007	54,500.00	54,500.00	100.0	10/18/2007	256	CR	FD				56	10404



# Deadline Compliance Status Report

- Broad report on HOME deadlines
  - Provided for most recent commitment, reservation and disbursement program year
  - For example, 2008 commitments and reservations and 2006 disbursements
- If shortfall, letter received from Field Office – 4 month and 1 month
  - Communicate with Field Office on documentation
  - Review monthly until no shortfall to ensure compliance

# Deadline Compliance Status Report (cont)

## HOME Deadline Compliance Status Report

Requirement Years: 2008 Commitments, 2008 CHDO Reservations, and 2005 Disbursements

As of 08/31/10

(sorted alphabetically by PJ)

PJ	+	Deadline Date	Original Allocation	Adjustments <sup>++</sup>	Requirement Amount	Total C.R. or D <sup>+</sup> through Deadline	%	Shortfall	Current Status
Abilene	C	10/31/2010	\$9,384,384	\$0	\$9,384,384	\$9,672,425	100.0	\$0	
	R	10/31/2010	\$9,384,384	\$0	\$1,407,658	\$1,812,640	19.3	\$0	
TX	D	10/31/2010	\$7,675,873	\$0	\$7,675,873	\$9,215,982	100.0	\$0	
Adams County Consortium	C	3/31/2010	\$13,843,241	\$79,191	\$13,764,050	\$14,106,930	100.0	\$0	
	R	3/31/2010	\$13,591,945	\$0	\$2,038,792	\$2,057,206	15.1	\$0	
CO	D	4/30/2010	\$10,757,807	\$79,191	\$10,678,616	\$12,880,012	100.0	\$0	
Aguadilla	C	8/31/2010	\$9,115,556	\$0	\$9,115,556	\$9,189,646	100.0	\$0	
	R	8/31/2010	\$9,115,556	\$0	\$1,367,333	\$2,168,798	23.7	\$0	
PR	D	9/30/2010	\$7,339,411	\$0	\$7,339,411	\$8,576,144	100.0	\$0	
Akron	C	3/31/2010	\$34,394,643	\$0	\$34,394,643	\$35,072,156	100.0	\$0	
	R	3/31/2010	\$34,056,451	\$0	\$5,108,468	\$5,768,102	16.9	\$0	
OH	D	3/31/2010	\$28,918,762	\$0	\$28,918,762	\$34,931,236	100.0	\$0	
Alabama	C	4/30/2010	\$254,424,826	\$0	\$254,424,826	\$267,922,418	100.0	\$0	
	R	4/30/2010	\$251,964,982	\$4,907,767	\$32,886,980	\$48,080,760	19.1	\$0	
AL	D	4/30/2010	\$206,106,974	\$0	\$206,106,974	\$235,050,710	100.0	\$0	
Alameda County Consortium	C	8/31/2010	\$60,730,530	\$0	\$60,730,530	\$61,214,039	100.0	\$0	One-month notice 7/26/10
	R	8/31/2010	\$60,030,278	\$0	\$9,004,542	\$11,688,049	19.5	\$0	
CA	D	7/31/2010	\$48,577,254	\$0	\$48,577,254	\$57,446,912	100.0	\$0	
Alaska	C	8/31/2010	\$51,341,700	\$0	\$51,341,700	\$52,278,636	100.0	\$0	
	R	8/31/2010	\$51,026,457	\$0	\$7,653,989	\$11,506,700	22.8	\$0	
AK	D	8/31/2010	\$42,270,789	\$0	\$42,270,789	\$48,770,242	100.0	\$0	

NOTE: Any ADDI allocations received through FY2007 are reflected in the Original Allocation and respective Requirements.

<sup>+</sup> C-Commitments, R-CHDO Reservations, D-Disbursements

<sup>++</sup> Adjustments could include grant reductions, deobligations, recapture of expired funds, or waivers of deadline requirements due to Presidentially-declared disasters.

<sup>\*</sup> PJ did not receive an allocation until after 2008. Therefore, it has no amount subject to the FY 2010 commitment or CHDO reservation deadline date.

<sup>\*\*</sup> PJ did not receive an allocation until after 2005. Therefore, it has no amount subject to the FY 2010 disbursement deadline date.

<sup>#</sup> Due to CHDO deobligation or waiver, PJ could have met its cumulative CHDO reservation requirement with a percentage less than 15%.

Source: Data entered by HOME Participating Jurisdictions into HUD's Integrated Disbursement and Information System (IDIS)

Friday, September 10, 2010

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# Vacant Units Report

- Helps PJs identify units in HOME projects that are marked "vacant" in IDIS
- Areas to monitor:
  - Identify projects with vacant units are part of completed HOME activity
    - Make sure occupancy and beneficiary data entered
    - If occupancy and beneficiary data no longer obtainable, data on current occupant can be used in its place

# Vacant Units Report

HOME VACANT UNITS REPORT  
SAMPLE

FIELD OFFICE	PJ	ST	IDIS ACT	PGM YR	PROJ ID	UNIT NUM	NUM BDRM	OCC IND	MSG	ACTIVITY STATUS	TENURE TYPE	RECIPIENT UNDERTAKING ACTIVITY	CITY	ST	ZIP	NUM D	GRANTEE_I
			2498	1996	1	9	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					1	510
			5100	2000	2	24	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					2	510
			5113	2000	4	20008	03	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					3	510
			5529	2001	8	C7	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					4	510
			5541	2001	8	720S	03	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					5	510
			5542	2001	8	203	02	2	* Warning Rental Unit OCC IND = 2 Owner Occupied *	Complete	Rental					6	510
			7291	2004	26	1035	01	2	* Warning Rental Unit OCC IND = 2 Owner Occupied *	Complete	Rental					7	510
			7295	2004	26	206	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					8	510
			8186	2005	193	101	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					9	510
			8186	2005	193	201	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					10	510
			8186	2005	193	404	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					11	510
			8186	2005	193	102	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					12	510
			8194	2005	193	12023	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					13	510
			214	2000	15	1609G	03	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					1	12767
			729	2003	33	2	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					2	12767
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					1	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					2	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					3	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					4	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					5	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					6	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					7	13855
			341	1996	76		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					8	13855
			411	1996	75	608	03	9	* Unit OCC IND = 9 Vacant *	Complete	Homebuyer					9	13855
			411	1996	75	608	03	9	* Unit OCC IND = 9 Vacant *	Complete	Homebuyer					10	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					11	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					12	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					13	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					14	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					15	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					16	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					17	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					18	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					19	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					20	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					21	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					22	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					23	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					24	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					25	13855
			446	1998	51		00		* Unit OCC IND must be 1.2 or 9 *	Complete	Rental					26	13855
			922	2000	57	228	02	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					27	13855
			1022	2002	56	1901E	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					28	13855
			1022	2002	56	1901F	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					29	13855
			1022	2002	56	1901G	01	9	* Unit OCC IND = 9 Vacant *	Complete	Rental					30	13855

# Snapshot Report

- Best report for rental activity progress
- Areas to monitor:
  - Commitments to Disbursements – close as possible to 100%
  - Rental commitments to rental disbursements – close as possible to 100%
  - CHDO commitments to disbursements – close as possible to 100%
  - Lease up – occupancy data for completed activities – as close as possible to 100%
  - Leveraged funds ratio – at least above national average

# Snapshot Report

## SNAPSHOT of HOME Program Performance--As of 06/30/08 Local Participating Jurisdictions with Rental Production Activities



Participating Jurisdiction (PJ): \_\_\_\_\_ State: \_\_\_\_\_

PJ's Total HOME Allocation Received: \$27,778,520 PJ's Size Grouping\*: B

PJ Since (FY): 1992

Category	PJ	State Average	State Rank	Nat'l Average	Nat'l Ranking (Percentile):*		
					Group	B	Overall
<b>Program Progress:</b>		PJs in State: <b>92</b>					
% of Funds Committed	<b>90.55</b> %	<b>92.79</b> %	<b>50</b>	<b>92.82</b> %	<b>31</b>	<b>31</b>	
% of Funds Disbursed	<b>68.76</b> %	<b>81.26</b> %	<b>79</b>	<b>82.38</b> %	<b>4</b>	<b>7</b>	
Leveraging Ratio for Rental Activities	<b>6.13</b>	<b>5.53</b>	<b>1</b>	<b>4.55</b>	<b>100</b>	<b>100</b>	
% of Completed Rental Disbursements to All Rental Commitments***	<b>54.13</b> %	<b>73.66</b> %	<b>67</b>	<b>80.69</b> %	<b>10</b>	<b>10</b>	
% of Completed CHDO Disbursements to All CHDO Reservations***	<b>37.75</b> %	<b>60.31</b> %	<b>70</b>	<b>67.01</b> %	<b>8</b>	<b>11</b>	
<b>Low-Income Benefit:</b>							
% of 0-50% AMI Renters to All Renters	<b>59.07</b> %	<b>77.64</b> %	<b>76</b>	<b>79.23</b> %	<b>8</b>	<b>9</b>	
% of 0-30% AMI Renters to All Renters***	<b>17.59</b> %	<b>41.54</b> %	<b>73</b>	<b>44.47</b> %	<b>6</b>	<b>9</b>	
<b>Lease-Up:</b>							
% of Occupied Rental Units to All Completed Rental Units***	<b>78.82</b> %	<b>91.23</b> %	<b>81</b>	<b>93.93</b> %	<b>8</b>	<b>7</b>	
<b>Overall Ranking:</b>			In State: <b>78</b> / <b>92</b>		Nationally: <b>7</b> <b>9</b>		
<b>HOME Cost Per Unit and Number of Completed Units:</b>							
Rental Unit	<b>\$13,952</b>	<b>\$31,525</b>		<b>\$24,984</b>	<b>557</b> Units	<b>64.20</b>	
Homebuyer Unit	<b>\$24,010</b>	<b>\$19,017</b>		<b>\$14,192</b>	<b>38</b> Units	<b>4.40</b>	
Homeowner-Rehab Unit	<b>\$13,684</b>	<b>\$26,126</b>		<b>\$20,036</b>	<b>273</b> Units	<b>31.50</b>	
TBRA Unit	<b>\$0</b>	<b>\$2,779</b>		<b>\$3,164</b>	<b>0</b> Units	<b>0.00</b>	

\* - A = PJ's Annual Allocation is greater than or equal to \$3.5 million (57 PJs)

B = PJ's Annual Allocation is less than \$3.5 million and greater than or equal to \$1 million (194 PJs)

C = PJ's Annual Allocation is less than \$1 million (292 PJs)

\*\* - E.g., a percentile rank of 70 means that the performance exceeds that of 70% of PJs.

\*\*\* - This category is double-weighted in compiling both the State Overall Ranking and the National Overall Ranking of each PJ.

Source: Data entered by HOME Participating Jurisdictions into HUD's Integrated Disbursement and Information System (IDIS)

Page 1



# Expiring Funds

- HOME *FACTS*, Vol. 1, No. 1
  - U.S. Treasury will automatically pull funds from a HOME PJ that are from older program years to fund national defense
- Areas to monitor:
  - Review report to determine if any activities are at risk
  - Pay careful attention to the years threatened (e.g., Federal Fiscal Year 2010, looking at 2003 program funds)
  - Activities in subfunds such as CHDO reservations (CR) and subfund SU at risk



# Expiring Funds Report

PJs with Undrawn Funds  
(1992 - 2003)

FY	ST	Participating Jurisdiction	Funding Source	Recipient of Funds	Fund Type	Balance to Commit	Balance to Draw
2003	ZZ	ANYTOWN	ANYTOWN	ANYTOWN SUPPORTIVE HOUSING FOR SENIOR ADULTS, INC.	CR	\$0.00	\$1.00
1995	ZZ	BLUESVILLE	BLUESVILLE	BLUESVILLE	CR	\$0.03	\$0.03
1997	ZZ	CLOUDYTOWN	THOUGHT LEADERS	CLOUDYTOWN AFFORDABLE HOUSING	CR	\$0.00	\$100.00
2000	ZZ	INSTITUTION	INSTITUTION	INSTITUTION COUNTY	SU	\$0.00	\$5,000.00
2001	ZZ	INSTITUTION	INSTITUTION	SAVE THE FARMS	SU	\$0.00	\$893.00
2003	ZZ	GUY'S	CHICO	COMMUNITY HOUSING IMPROVEMENT PROGRAM	CR	\$0.00	\$115,919.55
2003	ZZ	GIRLS	CHICAS	GOTHAM AREA ADVISORY COMMITTEE (GAAC)	CR	\$1.00	\$1.00
1996	ZZ	UPTOWN	UPTOWN	UPTOWN COMMUNITY DEVELOPMENT CORPORATION	CR	\$150.00	\$150.00
1998	ZZ	UPTOWN	UPTOWN	UPTOWN COMMUNITY DEVELOPMENT CORPORATION	CR	\$8,362.20	\$8,362.20
1999	ZZ	UPTOWN	UPTOWN	UPTOWN COMMUNITY DEVELOPMENT CORPORATION	CR	\$1,298.61	\$1,298.61
2000	ZZ	UPTOWN	UPTOWN	UPTOWN	CR	\$32,000.00	\$32,000.00
2003	ZZ	UPTOWN	UPTOWN	UPTOWN COMMUNITY DEVELOPMENT CORPORATION	CR	\$0.10	\$0.10
1998	ZZ	SPRAWL TOWN	SPRAWL TOWN	SPRAWL TOWN	EN	\$0.00	\$64.45
1999	ZZ	SPRAWL TOWN	SPRAWL TOWN	SPRAWL TOWN	EN	\$0.00	\$1,370.10
1995	ZZ	DOWN	DOWN	DESIGN BETTER COMMUNITY CENTERS DEVELOPMENT CORPORATION	CR	\$8,100.00	\$32,825.00
1999	ZZ	DOWN	DOWN	BEACHFRONT AFFORDABLE HOUSING	CR	\$0.00	\$50,039.85
2003	ZZ	DOWN	DOWN	BEACHFRONT AFFORDABLE HOUSING	CR	\$0.00	\$92,103.98
1993	ZZ	FAITHTOWN	FAITHTOWN	DEVOUT INTERFAITH HOUSING DEV	CR	\$0.80	\$0.80
1995	ZZ	FAITHTOWN	FAITHTOWN	THE CORNER CHURCH CDC	CR	\$0.12	\$0.12
1993	ZZ	SUSTAINABLETOWN	SUSTAINABLETOWN	GOOD SHEPHERD HOMES	CR	\$117,750.00	\$117,750.00
1995	ZZ	BUILD IT RIGHT	BUILD IT RIGHT	BUILD IT RIGHT	CR	\$9,649.00	\$9,649.00
1995	ZZ	BUILD IT RIGHT	BUILD IT RIGHT	BUILD IT RIGHT	SU	\$8,339.00	\$8,339.00
1995	ZZ	BUILD IT RIGHT	BUILD IT RIGHT	BUILD IT RIGHT	CR	\$0.00	\$1.00
2001	ZZ	LOST TIME TOWN	LOST TIME TOWN	RIDE THE BUS	EN	\$0.00	\$44,889.56
2003	ZZ	LOST TIME TOWN	LOST TIME TOWN	RIDE THE BUS	EN	\$0.00	\$50,819.40
1997	ZZ	THE COUNTY	THE COUNTY	THE CITY COMMUNITY LAND CORP	CR	\$0.00	\$6,432.00
1996	ZZ	MICKEY MOUSE	MICKEY MOUSE	THE CENTER DEVELOPMENT CORPORATION	CR	\$0.62	\$0.62
1999	ZZ	THE CITY	THE CITY	THE CITY	EN	\$0.00	\$28,128.65
2000	ZZ	THE CITY	THE CITY	THE CITY	EN	\$0.00	\$83,994.35
1994	ZZ	MEGOPOLIS	MEGOPOLIS	BIG CITY	CR	\$0.23	\$0.23
2001	ZZ	MEGOPOLIS	MEGOPOLIS	BIG CITY	CO	\$140,498.00	\$140,498.00
2003	ZZ	MEGOPOLIS	MEGOPOLIS	BIG CITY	EN	\$244,165.00	\$244,165.00
1996	ZZ	BREEZEWAY	BREEZEWAY	BREEZEWAY	CR	\$0.54	\$0.54
1992	ZZ	SUSTAINABLETOWN	SUSTAINABLETOWN	GOOD SHEPHERD HOMES	CR	\$39,994.49	\$39,994.49





# Section 3: How To Monitor Partners



# Elements of How to Monitor Partners

- Two approaches to monitoring partners
  - Desk Reviews: in the PJs office
  - On-site Reviews: in the field at partner's office and/or at rental housing property site
- Draw conclusions based upon results of desk and/or on-site reviews
  - Determine findings, concerns, observations

# Desk Reviews

- Serve two different purposes
  - Assess programs/projects funded by the PJ
    - Perform risk analysis to select on-site monitoring
    - Required annually for subrecipient programs
  - Prepare for on-site monitoring visit
- May also inform the PJ of partners or projects that should be monitored on-site

# Desk Reviews (cont)

- Typically desk reviews cover:
  - Monthly, quarterly, or annual reporting to the PJ including correspondence
    - Annual owners certification
    - Annual occupancy report (rental)
    - Other reports required monthly or quarterly
  - IDIS and HOME reports associated with activity
- Review areas:
  - Timely?
  - Is the documentation complete?

# Preparing for the On-site Monitoring Visit

- If going on-site, review the following related to the program/project being reviewed:
  - Application to the PJ
  - Written agreement
  - Partner procedures
- Identify appropriate monitoring staff
  - Activity specific expertise
  - Knowledge of partners programs
  - Financial expertise as necessary

# Preparing for the On-site Monitoring Visit (cont)

- Schedule the on-site monitoring visit
  - At least provide 30 days notice
- Send a letter confirming visit
  - Staff going on site
  - Date and time
  - Specific program/project being monitored
  - If rental, notice to tenants that physical inspections will occur

# On-site Monitoring

- Serves the following purposes
  - Identification of good and bad performance
  - Provides a more in-depth assessment of compliance than desk review
- Typical agenda:
  - Entrance interview
  - Interview staff individually
  - Review program and project files
  - Inspect units, if applicable
  - Talk to tenants/clients
  - Exit interview

# On-site Monitoring (cont)

- What to bring
  - Desk review documents (e.g., application, written agreements, procedures, reports)
  - HOME Income Limits (for years reviewing files)
  - HOME Rent Limits (for years reviewing files)
  - HOME regulations and policy guidance
  - Checklists and forms to be used/filled out on site (available using link below)
  - <http://www.hud.gov/offices/cpd/affordablehousing/training/web/checkup/performance/monitoringtools.cfm>
  - Local policies and procedures



# On-site Monitoring (cont)

- While on site, use checklists provided for
  - Pre-monitoring: desk review or first task on site of overall program/project
  - Project (case file) monitoring - individual project/beneficiary files
  - Program monitoring - analyze overall monitoring results
- Take thorough notes
- Be prepared to write monitoring letter/report

# On-site Monitoring (cont)

- Selecting files to review
  - Always review program-wide files, such as marketing and Environmental Review
  - Project/beneficiary files
    - Pre-select files in advance through review of occupancy or other reports
    - Refusals as well as awards
    - Fattest and thinnest files
    - Keep looking at files so long as issues are identified

# On-site Monitoring (cont)

- Sample size of files to review
  - Homebuyer and TBRA
    - 15-20% of beneficiary files
  - Small Rental (1-5 unit projects)
    - Review all tenant files
  - Large Rental (over 5 units)
    - Review 15-20% of beneficiary files
    - At least one unit in each building

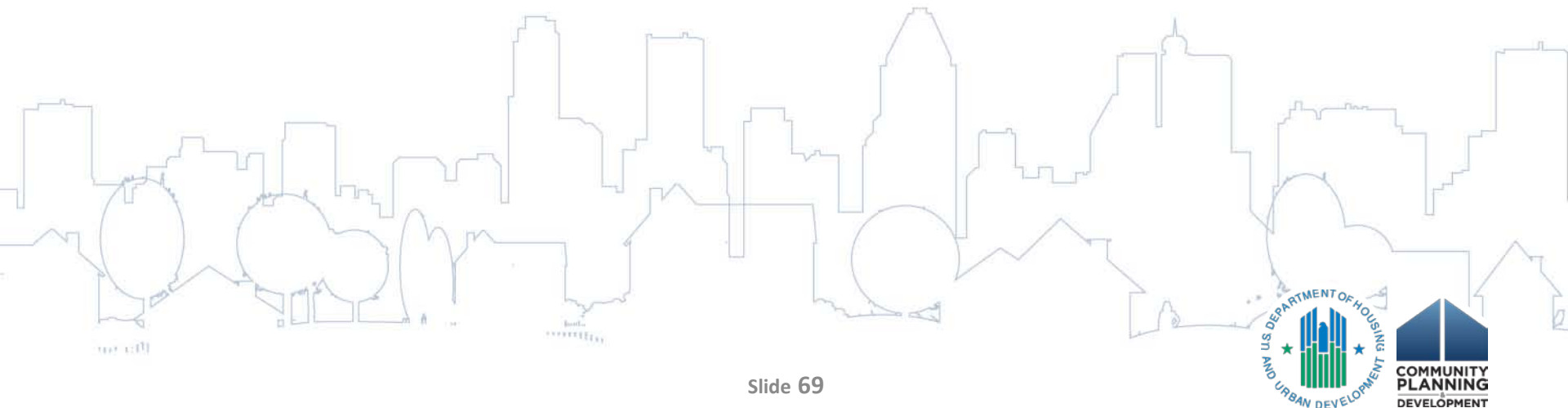
# On-site Monitoring (cont)

- Physical inspections
  - Rental - typically 15-20% of units in a project
    - Rental activities dictated by regulations – see more in activity chapter
  - TBRA – every unit must be inspected annually



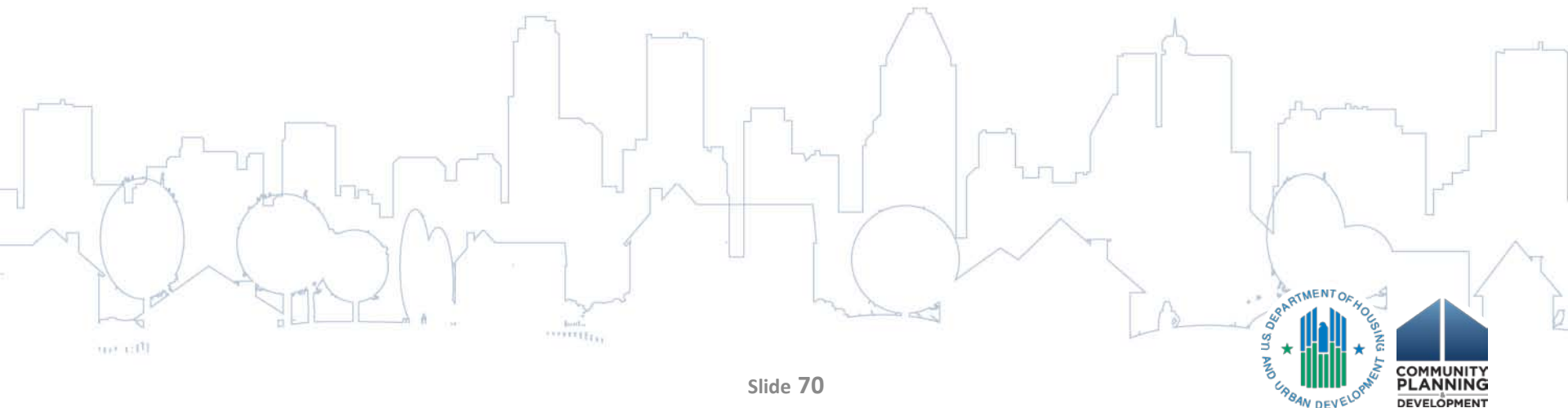
# Drawing Preliminary Conclusions

- Prior to the exit interview, review notes and inspection results
- Determine good performance as well as areas where improvement is warranted



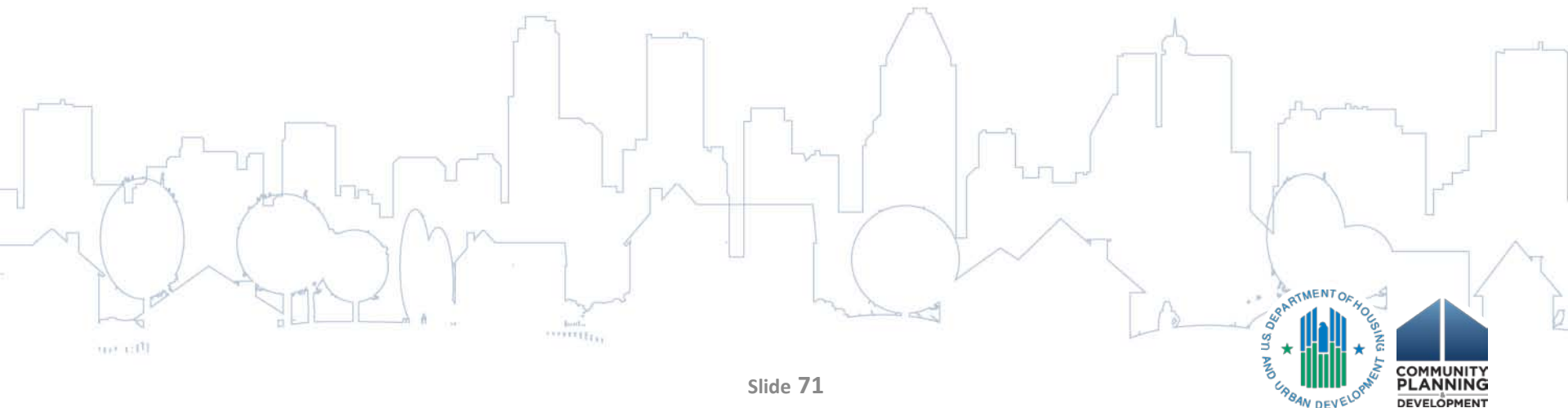
# Drawing Preliminary Conclusions (cont)

- Improved performance
  - Use program monitoring checklist to determine
    - Frequency/patterns of issues identified – does it happen all the time? Or one time?
    - Severity – Finding (regulatory), concern (could become regulatory), or observation?



# Drawing Preliminary Conclusions (cont)

- Improved performance (cont)
  - Pull together preliminary conclusions
    - Report on what you found – this allows the partner to fix issues ASAP
    - Indicate that further information will be provided in monitoring letter/report



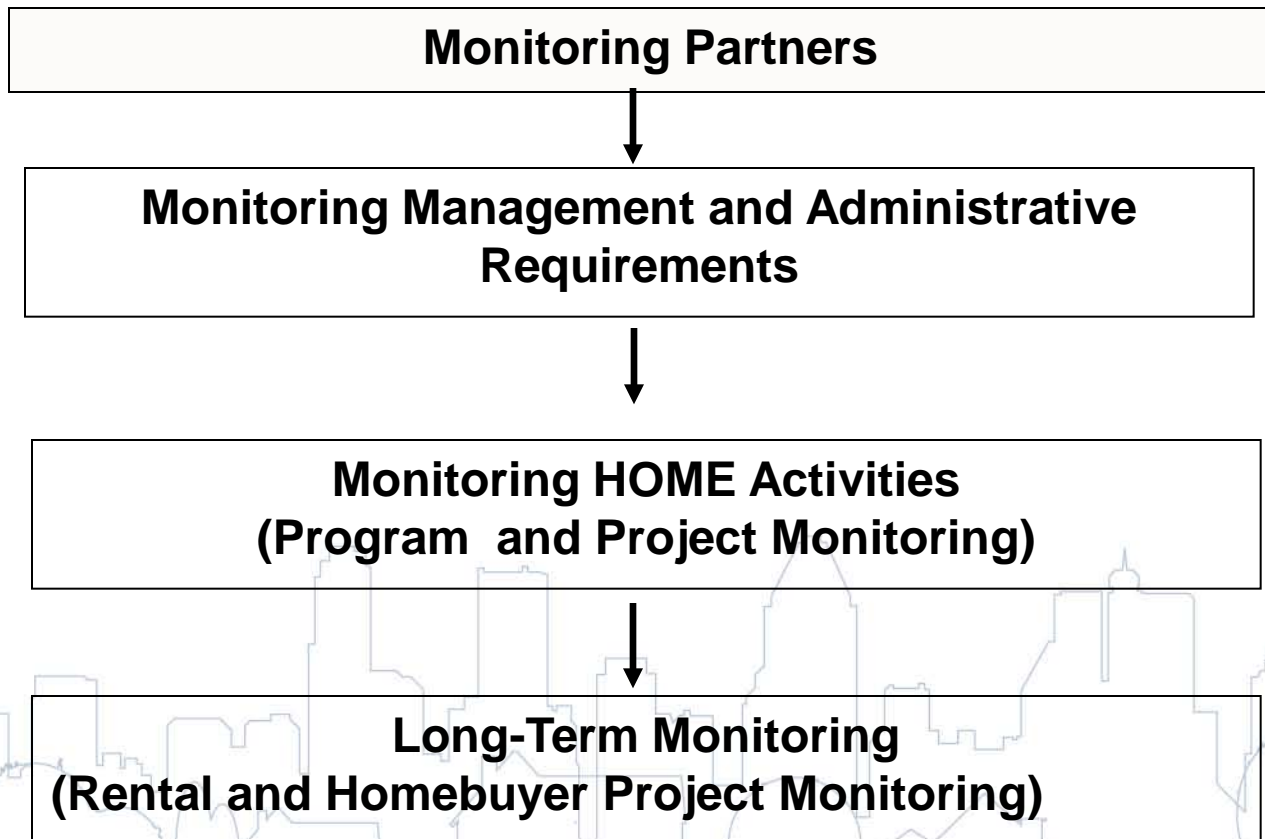


# **Monitoring HOME Partners (Chapter 2)**





# Overview of Monitoring Process



# Organizational Framework

- Section 1: CHDOs
- Section 2:
  - Subrecipients
  - State recipients
  - Consortia members
  - Contract administrators



# Types of Partners/Funded Entities Receiving HOME

- **CHDO:** nonprofit/owner/developer/ sponsor that meets qualifying criteria
- **Subrecipient:** nonprofit or public agencies that administer program on PJs' behalf
- **State Recipient:** unit of local govt designated by a state to receive HOME funds from state's allocation (treated as subrecipients)
- **Consortium:** group of local governments join together to receive HOME funds



# Section 1: CHDOs



# Overall Monitoring Framework

- CHDO specific monitoring
  - Chapter 2: Partners
- Activity specific monitoring
  - Chapter 5: Homebuyer programs
  - Chapter 6: Rental programs
- Written agreement
  - HUD Checklist 7-16: *Guide for Review of Owner, Developer, Sponsor Written Agreements*

# CHDO

## Key Monitoring Topics

- Must be certified as a CHDO
  - Nonprofit community based organization
  - Board composition
- Written agreements must be executed for eligible projects under CHDO set aside
- CHDOs should report on projects
- Files should indicate compliance
- HOME and IDIS reports indicate compliance

# CHDO Certification

- Use CHDO Checklist in CPD Notice 97-11 or checklists in guide
- Review certification files for:
  - Frequency
    - At least each time a CHDO is funded
  - Completeness
    - All required areas included
  - Approvals for each CHDO
    - Letter stating CHDO meets requirements and/or
    - Letter stating CHDO does not meet requirements and corrective actions

# Written Agreements with CHDOs

- Review project written agreements:
  - Roles: owner, developer, sponsor
  - Proceeds and how used
  - Project requirements – see activities
- Check other written agreements for explicit requirements:
  - Operating assistance
    - What can the assistance be used for?
  - CHDO pre-development loans
    - Are the funds for loans only?



# CHDO Reporting

- Areas to monitor:
  - While not required, reports may be required by written agreement
  - Check PJ staff reviews of reports and any further correspondence
  - Questions to ask:
    - Is the CHDO on track to meet requirements?
    - Are there any issues related to the activity?
    - What adjustments need to be made?

# Project File Monitoring

- Review projects for:
  - CHDO is certified at the time of funding
    - Compare date of letter issued by PJ to date of written agreement
  - Roles of the CHDO documented in file and matches written agreement
    - Ownership/Sponsorship – title to the property
    - Developer – development agreement
  - Proceeds used matches written agreement

# Project File Monitoring (cont)

- If CHDO operating or predevelopment loans, review projects for:
  - If operating assistance, only expenses allowed in written agreement documented
  - If loan provided:
    - Documentation project moved forward
    - Documentation of impediments and waived repayment of loan

# HOME and IDIS Reports

- PR25
  - Review CHDO reservations by CHDO to track activity progress
- PR22
  - Review CHDO activities by address to indicate incomplete, stalled or performing activities
- Vacant Units – are any CHDOs?
- Expiring Funds – are there CHDO funds on this report?

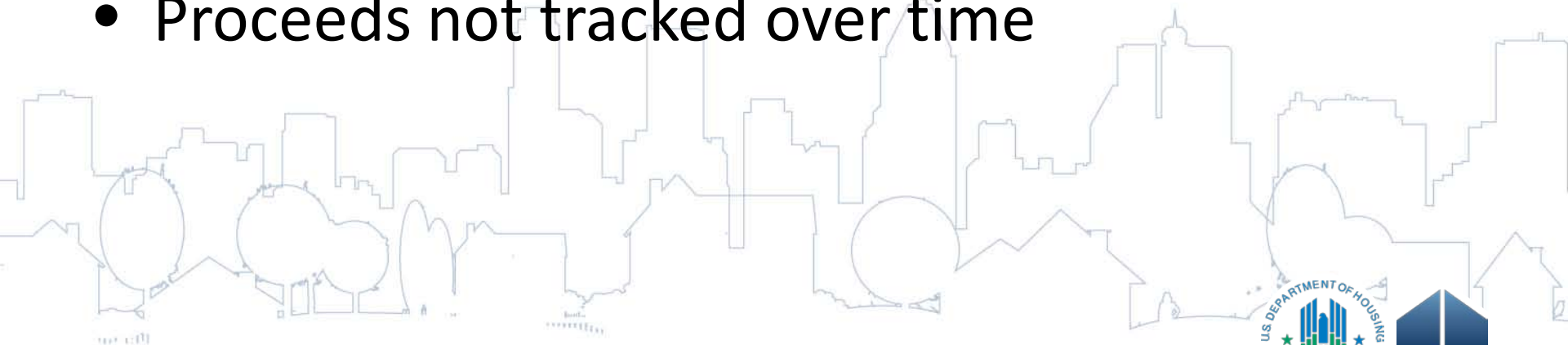
# Exercise 1: Monitoring CHDO Qualification: Part I

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out



# Typical Monitoring Issues: CHDOs

- Inadequate CHDO certification
  - Missing information
  - Out of date documentation
  - CHDO board changes over time
  - Staff turnover and/or lack of HOME experience
- Proceeds not tracked over time





# **Section 2: Subrecipients and State Recipients**



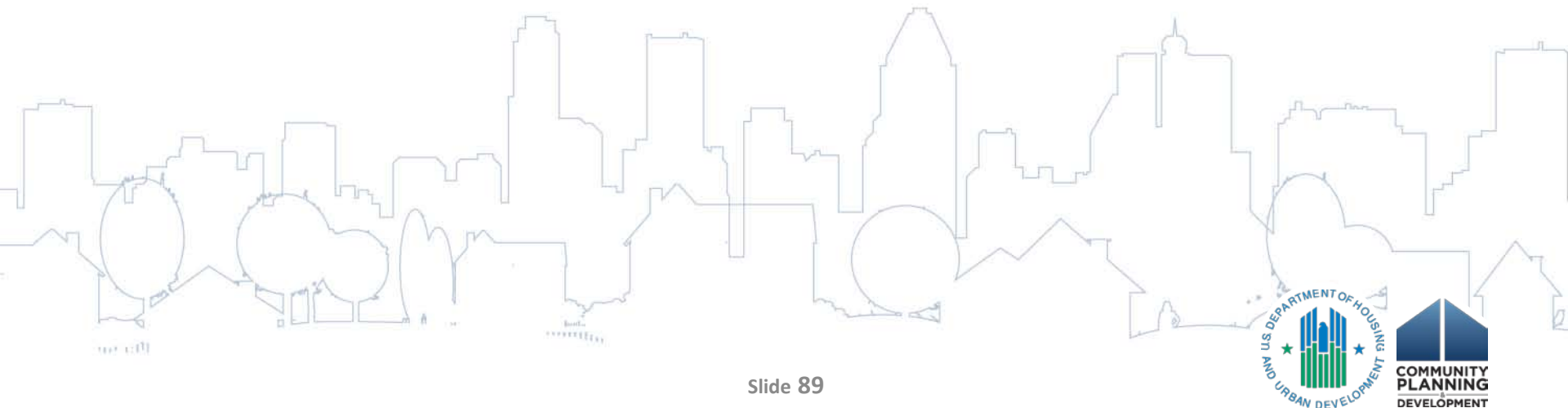
# Overall Monitoring Framework

- Organization specific monitoring
  - Chapter 2: Partners
- Activity specific monitoring
  - Chapter 4: Homeowner rehabilitation programs
  - Chapter 5: Homebuyer programs
  - Chapter 6: Rental programs
  - Chapter 7: TBRA
- Management and Administrative monitoring
  - Chapter 3: Management and Administrative Requirements



# Overall Monitoring Framework (cont)

- Organization written agreements
  - HUD Checklist Exhibit 7-18: *Guide for Review of Subrecipient Written Agreements*
  - HUD Checklist Exhibit 7-17: *Guide for Review of State Recipient Written Agreements*



# Key Subrecipient Topics

- Must annually monitor subrecipients
- Must ensure Subrecipients follow all the uniform administrative requirements
  - Part 84 or 85
  - OMB Circulars, including audits
  - Covered in detail in Chapter 3 and/or HUD checklists
- Check written agreements with subrecipients contain required provisions

# Key Subrecipient Topics (cont)

- Subrecipient reporting
- Project file monitoring
- Monitor program income
  - Earned for HOME activities and must be reported to the PJ/tracked
- Assessment of program and projects
  - More in activities (Chapters 4-7)
- HOME and IDIS reports indicate compliance

# Annual Monitoring Subrecipients

- Areas to monitor:
  - Document the monitoring occurred
    - In annual monitoring plan
    - Letters provided before and after monitoring
  - Monitoring results reported within appropriate timeframe to subrecipients
  - Review quality and consistency of on-site monitoring

# Written Agreements

- Areas to monitor:
  - Written agreements in file for all activities
  - All agreements are executed using the term “subrecipient” and include required provisions
- See more detail in Chapter 3 and in HUD checklists

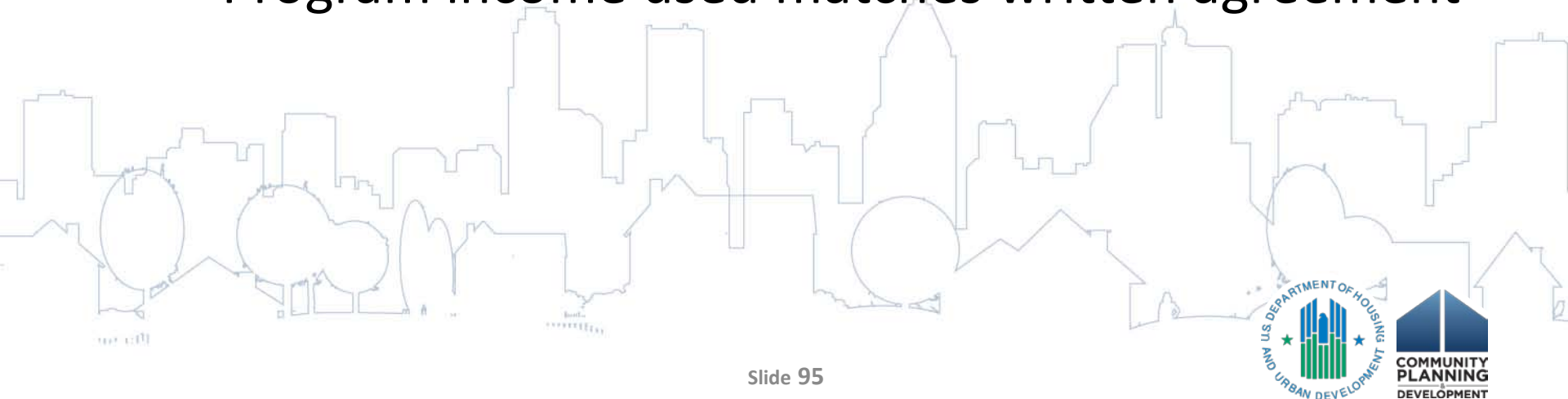


# Subrecipient Reporting

- Areas to monitor:
  - Document that reports are received by the PJ for the required frequency
  - Check PJ staff reviewed of reports and any further correspondence
  - Questions to ask:
    - Do the number of persons/units served meet or exceed requirements?
    - Does the schedule of tasks appear to be completed within required timeframe?
    - What adjustments need to be made?

# Project File Monitoring

- Review projects for:
  - Files indicate written agreement and subrecipient policies and procedures followed
  - Activity is in compliance with all the requirements
    - See activities (Chapter 4-7)
  - Program income used matches written agreement



# Program Income

- Areas to monitor:
  - Written agreement with subrecipient covers
    - What is PI
    - Is it kept/not kept, and
    - How PI is required to be used
  - If kept, is the PI reported to the PJ? Used before additional HOME \$ drawn?
  - If returned, is the PI reported to PJ and tracked in local accounting system?

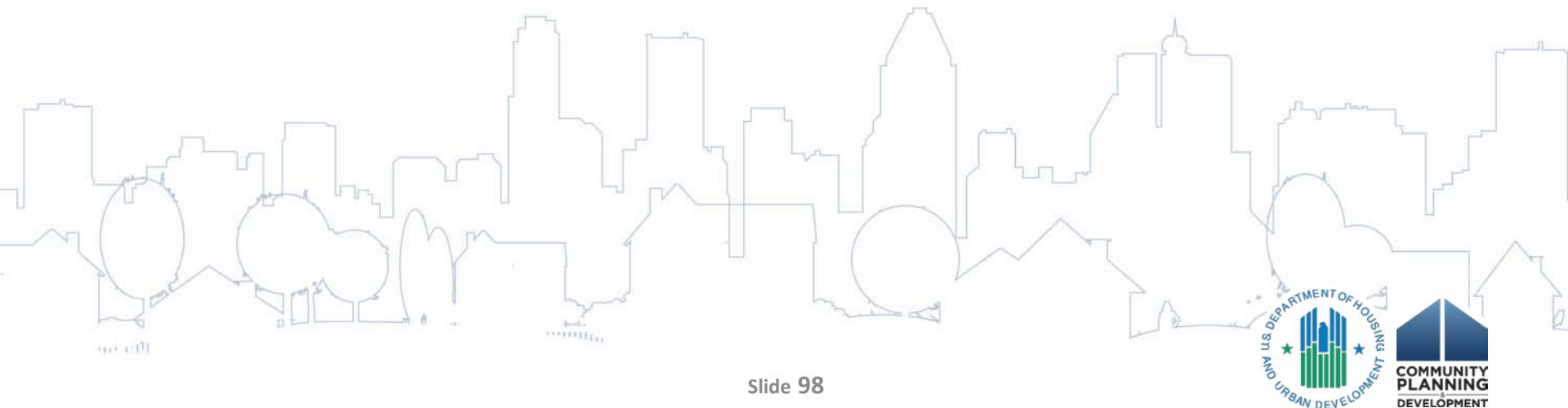


# HOME and IDIS Reports

- SNAPSHOT Report
  - If rental subrecipient:
    - Rental commitments to disbursements
    - Leveraging ratio
    - Lease-up of occupied units
  - All subrecipients:
    - Amount spent per unit – is this on track?
    - Demographic/race information – does this represent our community?

# HOME and IDIS Reports (cont)

- Vacant Units
  - Are any subrecipient activities?
- Expiring Funds
  - Are there expiring subrecipient funds in this report?

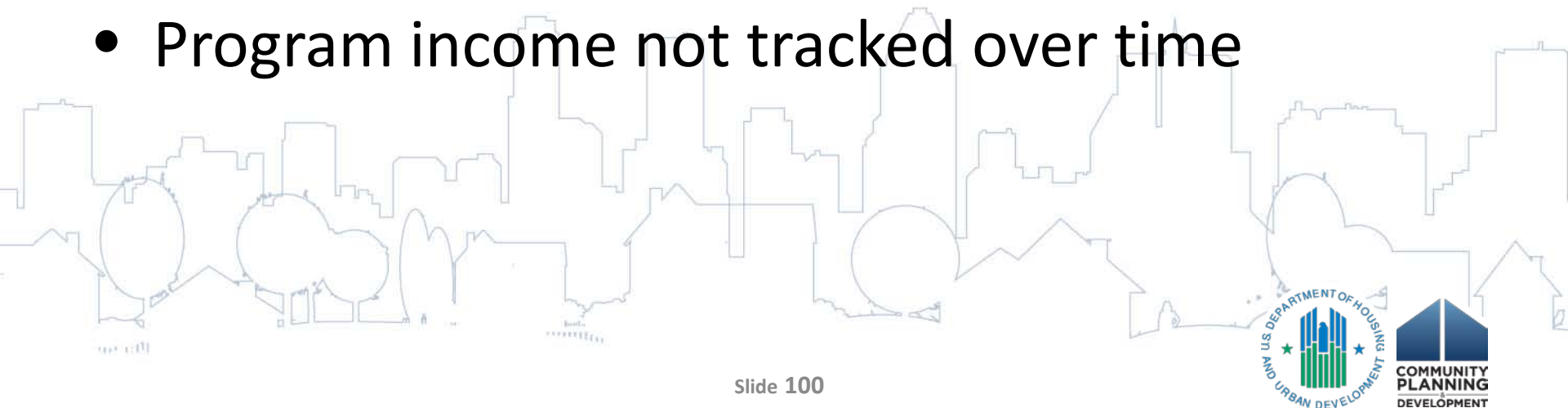


# HOME and IDIS Reports (cont)

- PR27
  - Check subfunds (SU) if used on commitments and disbursements
  - Check program income receipts and disbursements
- PR22
  - Review subrecipient activities by address to indicate incomplete, stalled or performing activities

# Typical Monitoring Issues: Subrecipients

- Staff turnover and/or lack of HOME experience
- Not in compliance with the regulations or terms of written agreement
- Late or missing reports
- Program income not tracked over time



# Monitoring – Does it Depend on the Type of Entity?

- Discuss as a table
- How would you monitor these different types of entities (e.g., CHDOs v. subrecipients)?
- Would you monitor these entities differently?
- Designate a spokesperson and provide at least two reasons why you might monitor these organizations differently and two issues that would remain the same regardless of entity

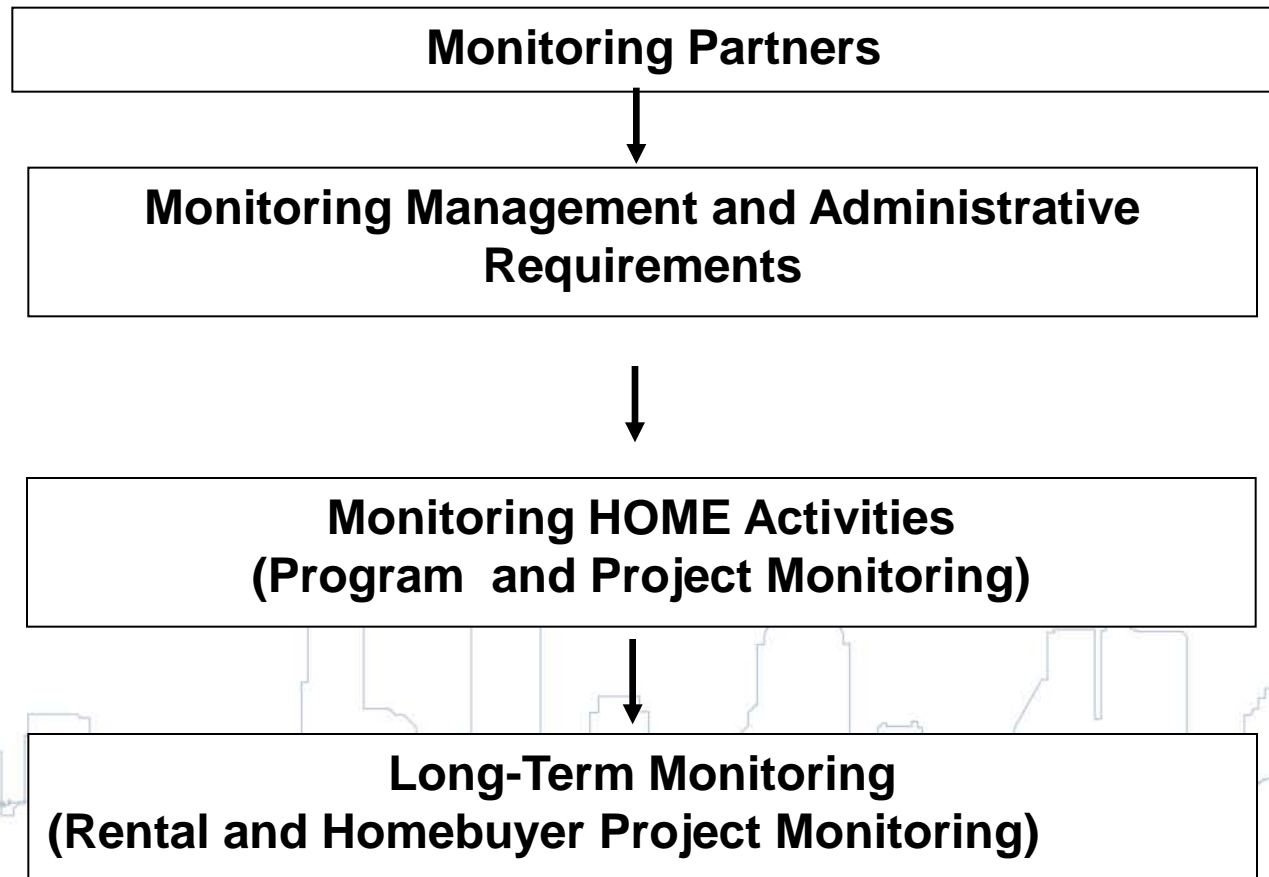




# **Monitoring Management and Administrative Requirements (Chapter 3)**



# Overview of Monitoring Process



# Overall Monitoring Framework

- Chapter checklists
- HUD checklists – full versions, including:
  - Checklist 7-2: *Guide for Review of Overall Management Systems*
  - Checklist 7-13: *Guide for Review of Match Requirements*
  - Checklist 7-20: *Guide for Review of Financial Management*
  - Checklist 7-21: *Guide for Review of Cost Allowability*
  - Checklist 7-22: *Guide for Review of Procurement*
  - Checklist 7-23: *Guide for Review of Equipment and Equipment Disposition*

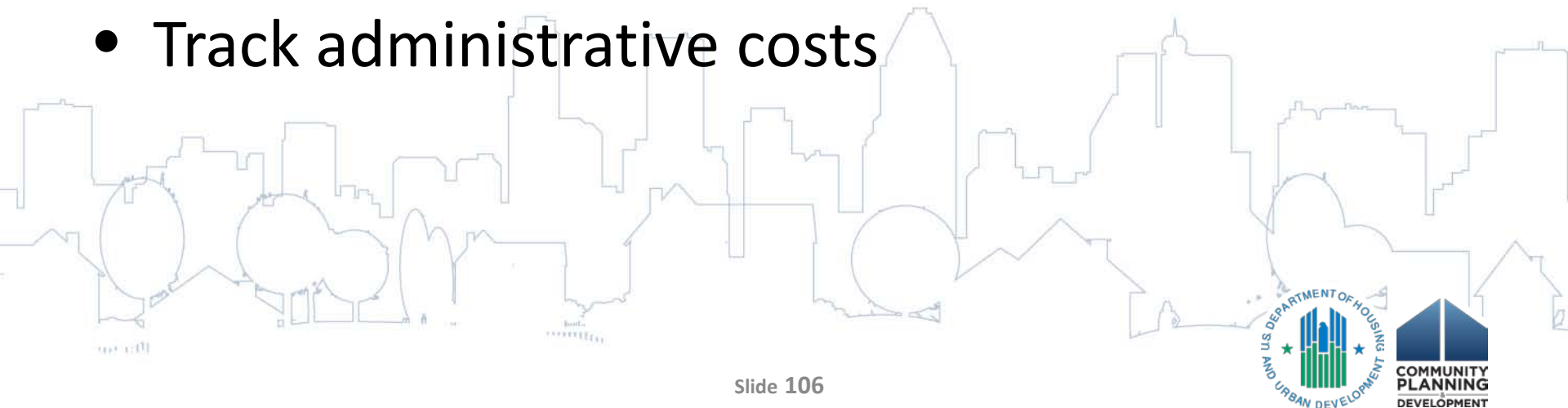


# Overall Monitoring Framework (cont)

- Written Agreements
  - Checklist 7-14: *Guide for Review of Beneficiary Written Agreements*
  - Checklist 7-15: *Guide for Review of Contractor Written Agreements*
  - Checklist 7-16: *Guide for Review of Owner, Developer, Sponsor Written Agreements*
  - Checklist 7-17: *Guide for Review of State Recipient Written Agreements*
  - Checklist 7-18: *Guide for Review of Subrecipient Written Agreements*
- Other Federal – see monitoring chapters 21-27

# Management and Administrative Key Monitoring Topics

- Ensure PJ allocation meets HOME requirements
- Review requirements for Commitments, reservations and disbursements
- Execute written agreements
- Track administrative costs



# Management and Administrative Key Monitoring Topics (cont)

- Ensure match obligation is met
- Report, receipt, track and use program income, recaptured funds, and repayments
- Fulfill cross-cutting requirements
- Maintain records to ensure compliance



# PJ Budget/Allocation

- Budget prepared and approved for:
  - Administration (10%)
  - Activities and/or HOME projects
  - Program income
- Allocation plan (typically states)
  - Criteria for competitive applications and/or formula allocations

# PJ Budget/Allocation (cont)

- Areas to monitor:
  - No more than 10% costs for administration – PJs/subrecipients
    - Written agreements and IDIS reports
  - At least 15% for CHDO set-aside activities
    - IDIS data and reports
  - At the PJ's discretion
    - No more than 5% CHDO operating
    - No more than 10% of the CHDO set aside for pre-development loans
    - Review IDIS data and reports

# Commitments, Reservations and Disbursements

- Areas to monitor:
  - Document deadline date for all – last day of the month award letter executed with HUD
    - 24 months commitments and CHDO reservations
    - 60 months for disbursements
  - Written agreements executed
  - If applicable, documentation of PJ development for commitments
  - Documentation on disbursements such as invoices, drawdowns, and back up

# Written Agreements

- Areas to monitor:
  - Agreements executed with all HOME-funded parties
  - Required HOME provisions & any other local provisions
  - Proper clauses for type of entity funded (e.g., CHDO vs. subrecipient)
  - Period of agreement matches that of affordability period (if applicable)
  - Executed & recorded in accordance with local law

# Administrative Costs

- Areas to monitor:
  - Documentation that costs do not exceed 10% of HOME allocation plus 10% of PI
    - Worksheet and/or IDIS reports
  - Costs are eligible and have source documentation
    - Budgets with salary allocation
    - Job descriptions/duties
    - Timesheets as back-up
  - Project related soft costs charged to admin if project did not move forward



# Uniform Administrative Requirements

- Areas to monitor:
  - Written agreements cover requirements
  - Procedures cover allowability, allocability, and reasonableness of costs
  - Indirect costs supported with indirect cost allocation plan
  - Records indicate source and application of funds
  - Budget & accounting records that expenses applied within grant period
  - Approvals for costs are complete based upon controls in place
  - Back up documentation exists for all costs charged

# Uniform Administrative Requirements (cont)

- Areas to monitor:
  - Most recent audit to determine pre-monitoring compliance
  - Drawdown request must include accurate information
  - Funds drawn down erroneously returned to HOME accounts
  - Disbursement of funds occur within 15 days
  - If grant advances are placed in an interest-bearing account, interest income above \$100 remitted to the U.S. Treasury on a quarterly basis

# Match

- Areas to monitor:
  - Document 25% of HOME funds are matched by end of federal fiscal year
    - Check match log and documentation
  - Written agreements cover match requirements
  - Match log is kept up-to-date
  - Calculations are correct
  - Back up documentation is included in the file

# Match (cont)

- Areas to monitor (cont):
  - Project files indicate source for match credits
  - For HOME-eligible units, written agreements executed with owners
    - Documentation of monitoring for units
      - Principal residence met for homebuyer
      - Rents, income limits, leases, and property standards met for rental

# Program Income, Repayments and Recaptured Funds

- Program income
  - Gross income received by PJ, state recipient or subrecipient
- Recaptured funds
  - From homebuyers; treated like program income, except no 10% for admin
- Repaid funds
  - Repaid from non-eligible project or activity; must return to Treasury account

# *Group Discussion Topic*

## Monitoring Income Sources

- Discuss as a table
- How would you monitor these different income sources?
- What tools would you use to make monitoring easier?
- Designate a spokesperson and provide at least two ways to monitor these income sources and two possible tools to use

# Program Income, Repayments and Recaptured Funds (cont)

- Areas to monitor:
  - Written agreements cover each possible income source
  - Accounting records provide receipt, recordation and classification of PI recaptured, and repayment funds
  - Funds receipted in IDIS
  - PI and recaptured funds were used before new draws and met applicable HOME requirements
  - Repaid funds handled by returning funds to HUD (see *HOME Facts* Vol. 1, #1)

# Other Cross-Cutting Requirements

- Non-Discrimination and Fair Housing (92.505(a)) and Handicapped Accessibility (Part 8, Section 504)
- Section 3 (24 CFR Part 135)
- Environmental (Part 58)
- Lead Paint (Part 35)
- Relocation/acquisition (Part 42)
- Labor standards (92.354)
- Excluded parties (debarred/suspended) (92.350)
- Note: Check full compliance by using HUD checklists on these topics



# Other Cross-Cutting Requirements: Nondiscrimination/Fair Housing/504

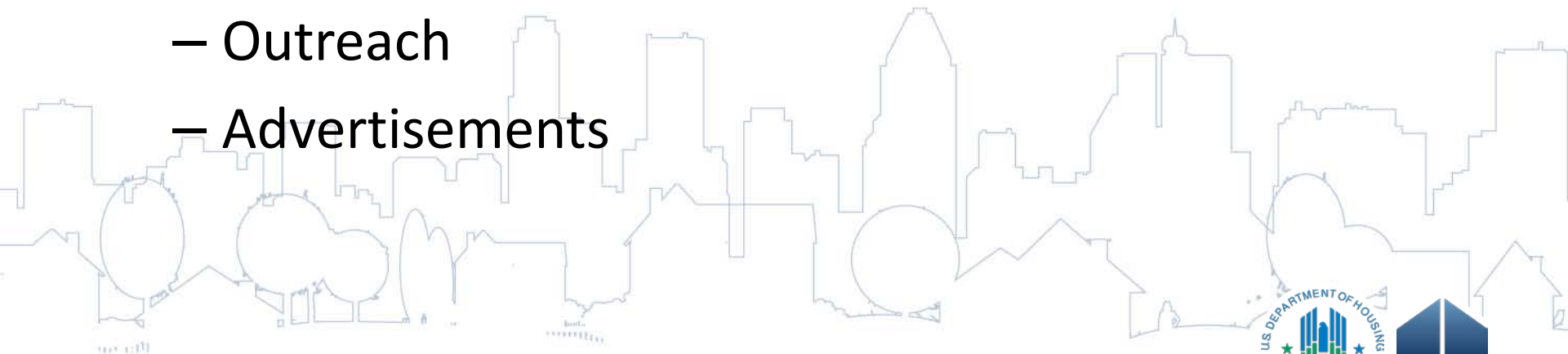
- HOME: Affirmative marketing
  - Applies for 5+ HOME assisted units
- Title VI of the Civil Rights Act
- Fair Housing Act
- Section 504
- Americans with Disabilities Act (ADA)
- Age Discrimination

# Other Cross-Cutting Requirements: Nondiscrimination/Fair Housing/504 (cont)

- Areas to monitor:
  - Written agreement for required language and program/project compliance
  - Program marketing materials for use of logos and lingos
  - Project marketing, tenant selection
  - Beneficiary files for nondiscrimination
    - Refusals as well as assisted households

# Other Cross-Cutting Requirements: Section 3

- Requires employment and contracting opportunities for low income residents
- Develop a Section 3 Action Plan
- Areas to monitor:
  - Written agreement for required language
  - Outreach
  - Advertisements



# Other Cross-Cutting Requirements: Environmental Review

- Environmental review of HOME projects required before any funds obligated
- Environmental review refers to process of looking at project for impact on environment and notifying the public of findings
- Areas to monitor:
  - Written agreement for required language
  - Environmental Review Record
    - Project descriptions, maps, pictures
    - Notices
    - Correspondence
    - Public comments

# Other Cross-Cutting Requirements: Lead Based Paint

- Lead Safe Housing Rule (LSHR)
  - Applies to HUD-assisted residential properties
- Disclosure Rule
  - Applies to all residential properties
- Renovation, Repair and Paint (RRP) Rule
  - Applies to all residential properties



# Other Cross-Cutting Requirements: Lead Based Paint (cont)

- Areas to monitor:
  - Written agreement for required language
  - Lead based paint policies and procedures
    - Type of activity and method for addressing (e.g., paint testing, risk assessment, abatement, etc.)
    - Presumption, if applicable
  - Pamphlet and required notices to beneficiaries

# Other Cross-Cutting Requirements: Relocation

- Uniform Relocation Act (URA)
  - When real property is acquired or persons displaced as a direct result of acquisition, demolition, and rehabilitation for a Federally funded project
  - Applies to government agencies, private organizations and others
  - Note: URA may be triggered if federal assistance is in any phase of project
- 104(d)
  - Triggered only when demolition or conversion of units

# Other Cross-Cutting Requirements: Relocation (cont)

- Areas to monitor:
  - Written agreement for required language
  - Documentation of vacant unit
  - Voluntary sales notice (e.g., homebuyer)
  - Relocation plan, if applicable
  - Notices provided to tenants, if applicable
  - Calculation of rental assistance, if applicable



# Other Cross-Cutting Requirements: Labor and Excluded Parties

- Davis-Bacon
  - If 12+ HOME-assisted units
- Contract Work Hours & Safety Standards Act (no more than 40 hrs. unless OT)
- Copeland Anti-Kickback Act
  - Certificate required from contractors
- Fair Labor Standards
  - Federal minimum wage and OT
- Excluded Parties
  - Contractor not excluded, debarred from working with federal funds

# Other Cross-Cutting Requirements: Labor and Excluded Parties (cont)

- Areas to monitor:
  - Written agreement for required language
  - Check wage rates are correct
  - Payrolls certified and posters on-site (if Davis-Bacon)
  - Verify contractors not excluded/debarred by printout from GSA website

# Recordkeeping

- Areas to monitor:
  - Document files kept for 5 years after the period of affordability (some must only be kept for initial 5 year period)
  - Make sure written agreements cover:
    - Proper time period for keeping documents
  - Location, condition of files
  - Checklists and other tools used
  - Citizens have reasonable access
    - Check requests that have come in and how handled

# Typical Monitoring Issues: Management and Administrative

- Allocations are not tracked and/or exceeded
- Falling short on commitments, reservations and disbursements
- Written agreement provisions executed with the wrong type of entity, lack clarity in roles and requirements
- Lack of documentation with other federal requirements

# Typical Monitoring Issues:

## Management and Administrative (cont)

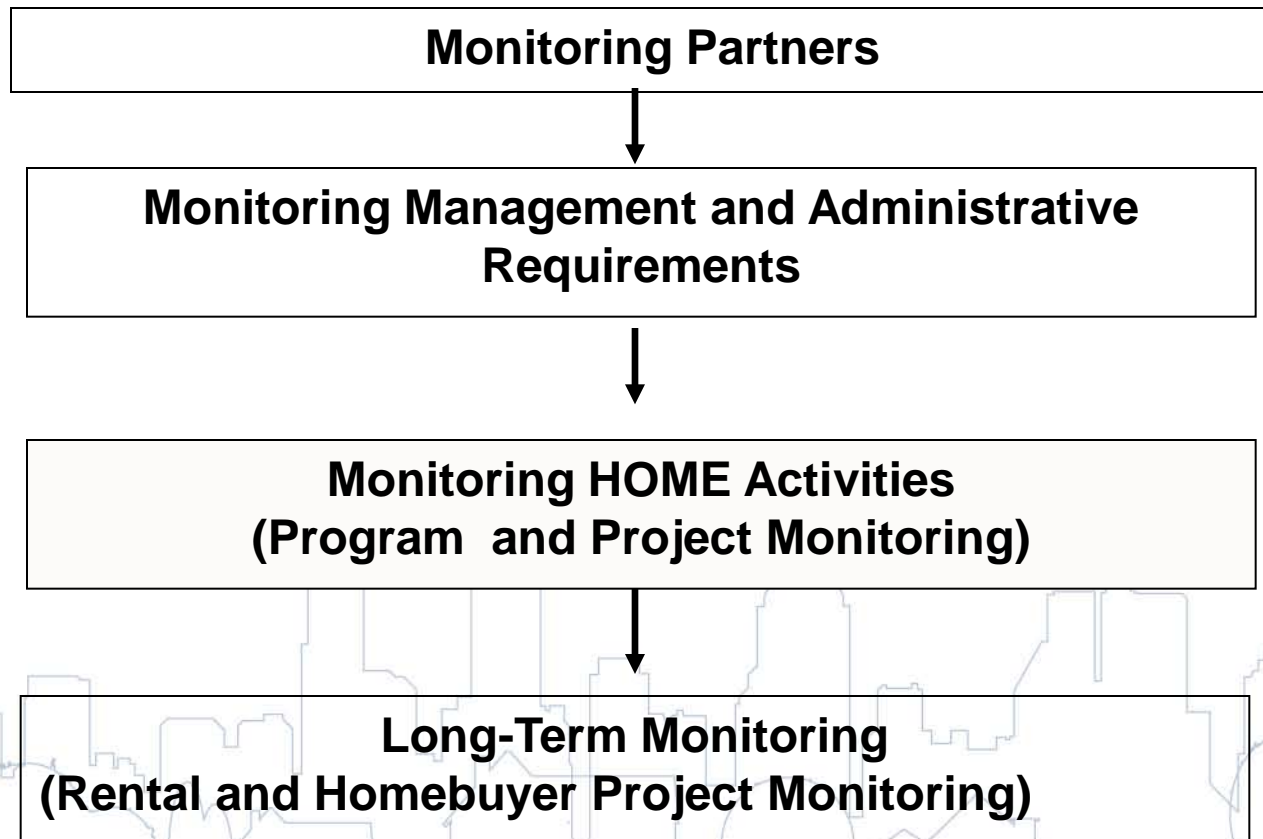
- Program income not reported by others and/or not receipted in IDIS
- Recaptured and repayment funds are not handled correctly
- Match is not calculated correctly or not documented
- Lack of documentation on other federal requirements
- Records not kept for appropriate amount of time



# Homeowner Rehabilitation Programs (Chapter 4)



# Overview of Monitoring Process



# Overall Monitoring Framework

- Activity specific monitoring
  - Chapter 4: Homeowner programs
- Subrecipient specific monitoring
  - Chapter 2: Partners
  - Chapter 3: Management and Administrative Requirements





# Manual Attachments

- Attachment 4-A: *Client File Form – Homeowner Rehabilitation*
- Attachment 4-B: *Summary of Lead-based Paint Requirements for Homeowner Rehabilitation*
- Attachment 4-C: *Summary of Key Homeowner Rehabilitation Rules and How to Document*
- Attachment 4-D: *Other Federal Requirements for Homeowner Rehabilitation*

# Homeowner Rehabilitation Key Monitoring Topics

- Program administrator
- Participant eligibility
- Principal residence
- Income eligibility
- Minimum and maximum subsidy



# Homeowner Rehabilitation Key Monitoring Topics (cont)

- Eligible costs
- Eligible ownership
- Property value and type
- Property standards
- Construction management



# Program Administrator

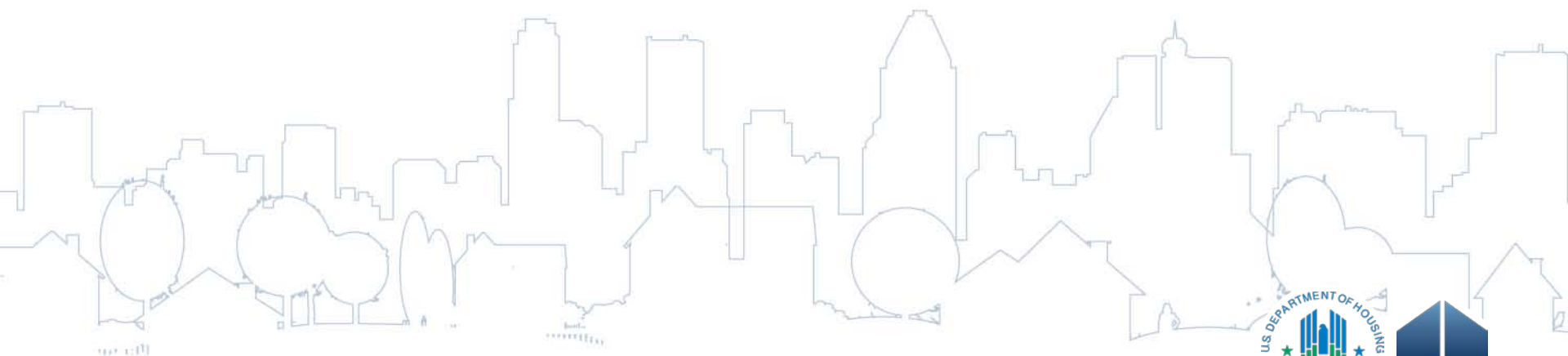
- The PJ, subrecipients, state recipients, consortia members or contract administrator may administer the program
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement, and policies and procedures
    - Is the program being administered based upon these documents?
    - Are milestones/performance measures being met?

# Participant Eligibility

- Areas to monitor:
  - Who's an eligible applicant?
  - Are there preferences/criteria for assistance such as type of rehabilitation or serving the elderly?
  - Is the program consistent with the consolidated plan?
  - Are the program marketing materials accessible?

# Principal Residence

- Areas to monitor:
  - Execution of written agreement
    - Homeowner affirms unit is principal residence, OR
  - Principal residency requirement documented by:
    - Tax and/or utility records
    - Inspection or other means to verify unit owner lives in unit



# Income Eligibility

- Where to get income limits?
  - <http://www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/income/>
- Areas to monitor:
  - Written agreement/procedures with subrecipients states required income definition (if applicable)
  - Application – does it include all household members?
  - All households signed a release (if using 3<sup>rd</sup> party)

# Income Eligibility (cont)

- Areas to monitor (cont):
  - Household size against application
  - Beneficiaries are low income (compared to applicable HUD chart)
  - Calculation worksheet filled out completely, dated and income compared to limit in the file





# Income Eligibility (cont)

- Areas to monitor (cont):
  - Source documentation
    - Verifications – employment, source letters from SSA, SSI, etc.
    - Pay stubs or other methods
  - Determinations are not older than 6 months prior to homeowner assistance (i.e., HOME written agreement)
  - If longer than 6 months, documentation of recertification

# Minimum Subsidy

- Areas to monitor:
  - Written agreement with subrecipients (if applicable) and procedures for the program
  - IDIS report, PR22 indicates all homeowner rehabilitation units met minimum threshold
  - Files indicate at least \$1,000/per unit
  - Pay careful attention to emergency items

# Maximum Subsidy

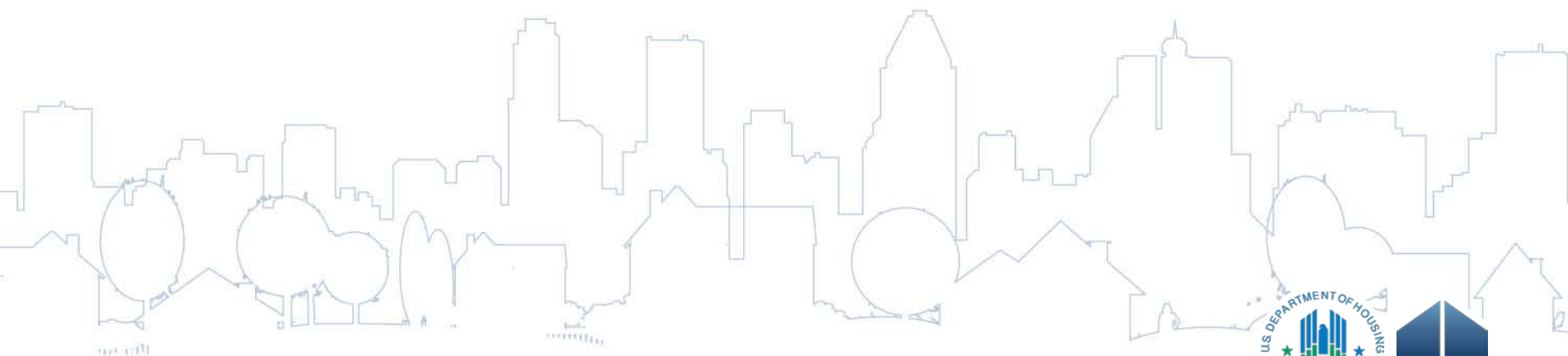
- Where to get limit?
  - CPD rep can provide 221 (d)(3) limit, OR
  - See HOMEfire Vol.9, No.4
- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Files indicate assistance is no greater than the cap per unit
  - Pay careful attention to reconstruction where costs are high

# Eligible Costs

- Where to get costs?
  - HOME Regulations 24 CFR 92.206
  - Chart in book, Figure 4.1
- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Files, such as work write-ups/cost estimates
  - Inspections confirm only eligible costs funded by HOME
  - Check reasonableness of costs

# Eligible Ownership

- Areas to monitor:
  - Files contain
    - Fee simple title or deed to the property
    - 99-year leasehold
    - Other form approved by HUD



# Eligible Property Type

- Areas to monitor:
  - Files include inspection/photos indicate no more than 4 units assisted
  - Tax or other documentation indicating number of units
  - If HOME-assisted and property includes rental units, document rental compliance

# Property Value

- Where to get limit?
  - Ask CPD rep
  - See HOMEfire Vol.10, No.1
  - PJs can do their own calculation with HUD approval
- Areas to monitor:
  - Files contain documentation of one of 3 methods:
    - Appraisal
    - Tax assessment
    - In-house estimate (e.g., comparables)
  - Methodology compared to 95% value limit

# Property Standards

- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Selected bids to meet written rehabilitation standards and applicable codes/standards
  - Files include inspections (initial, progress & final), work-write ups, and cost estimates
  - Pay careful attention to change orders



# Construction Management

- Areas to monitor:
  - Formal sealed bid (PJ process) or informal bid (homeowner) documentation
  - Review and approval of bids
    - Compare bid to cost estimate
    - If more than 10%, review and determine if changes need to be made to procedures
  - Print out from excluded parties listing from the web
  - Lead based paint compliance is met

# Construction Management (cont)

- Areas to monitor (cont):
  - Executed contract with proper signatures
  - Pre-construction meetings (if applicable) copies of Notice to Proceed
  - Inspection reports and notes
  - Verify that change orders signed by all parties & properly approved
  - Check to see that payments not released until work inspected
  - Warranties and lien waivers obtained from contractor

# Exercise 2: Property Standards

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out



# Typical Monitoring Issues: Homeowner Rehabilitation

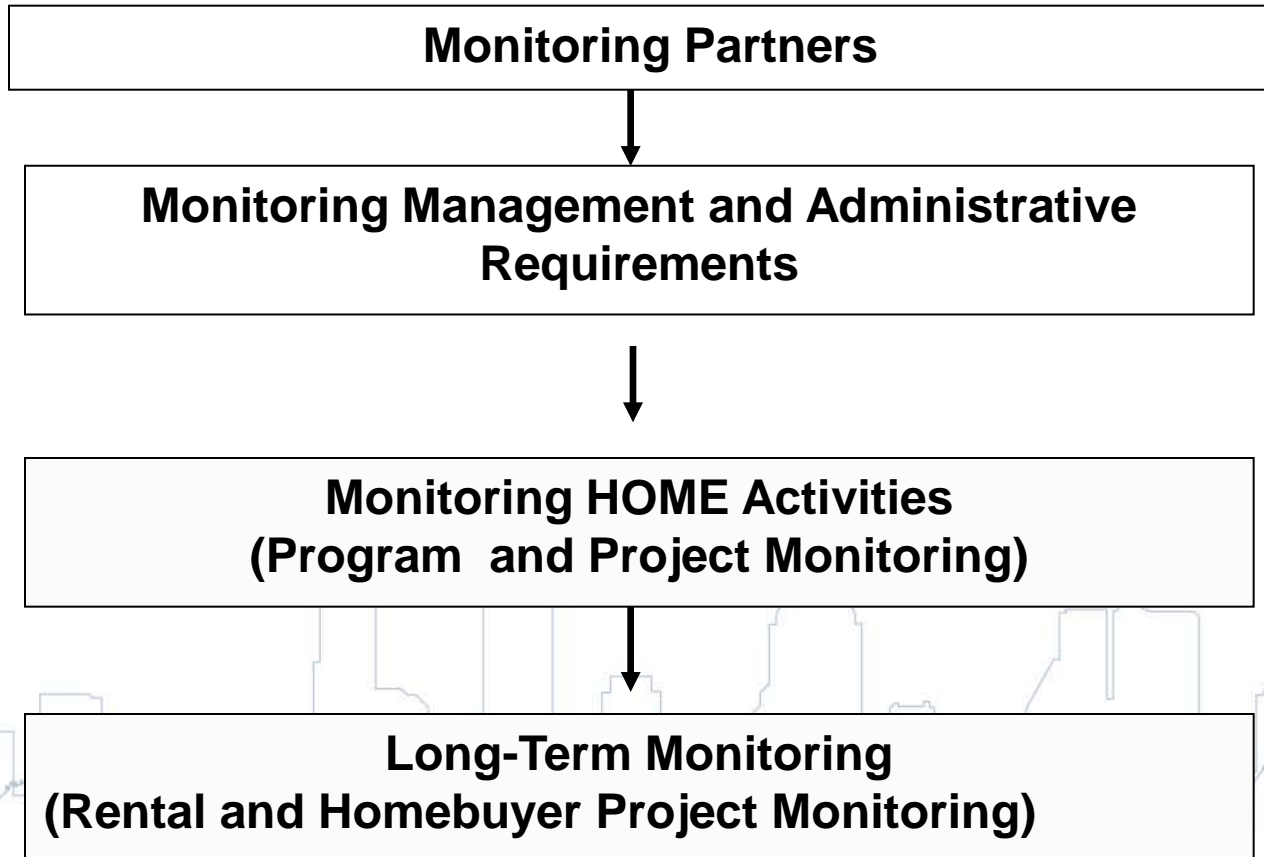
- No documentation that unit was principal residence at the time of HOME assistance
- Income eligibility not re-verified after 6 months has past and no HOME assistance provided
- Property standards documentation is incomplete and difficult to determine if the unit met code
- Lack of documentation that the unit after-rehabilitation value is less than the 95% value limit



# Homebuyer Programs (Chapter 5)



# Overview of Monitoring Process



# Overall Monitoring Framework

- Activity specific monitoring
  - Chapter 5: Homebuyer programs
- CHDO specific monitoring
  - Chapter 2: Partners
- Subrecipient specific monitoring
  - Chapter 2: Partners
  - Chapter 3: Management and Administrative Requirements

# Manual Attachments

- Attachment 5-A: *Client File Form – Homebuyer Program*
- Attachment 5-B: *Summary of Lead-based Paint Requirements for Homebuyer Programs*
- Attachment 5-C: *Summary of Key Homebuyer Rules and How to Document*
- Attachment 5-D: *Summary of Other Federal Requirements for Homebuyer Programs*



# Homebuyer Key Monitoring Topics

- Program administrator/Project Developer
- Participant eligibility
- Income eligibility
- Eligible costs
- Minimum and maximum subsidy
- Cost allocation
- Subsidy layering

# Homebuyer Key Monitoring Topics (cont)

- Eligible ownership
- Property value and type
- Property standards
- Construction management
- Period of affordability-Resale/Recapture

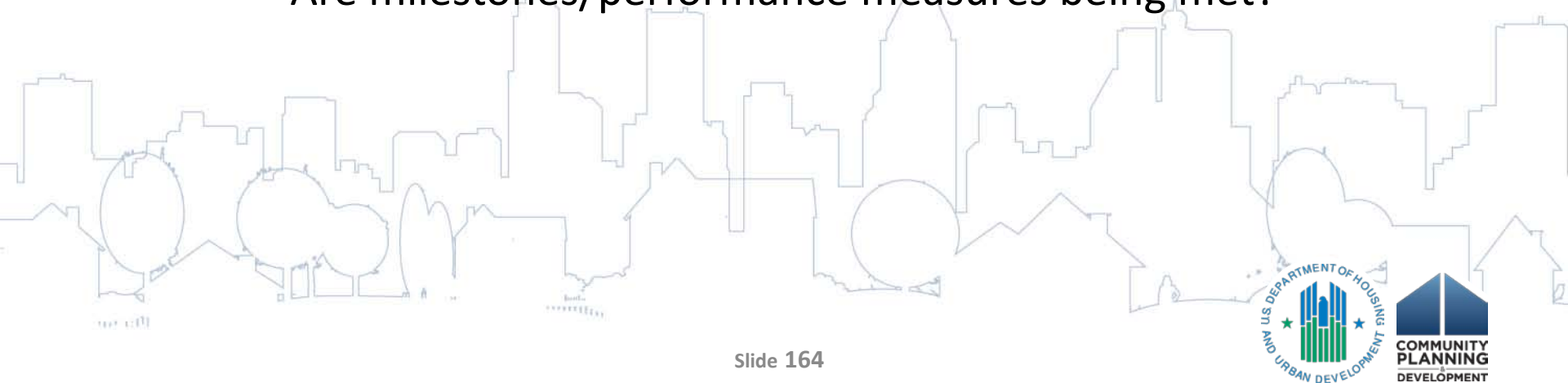


# Program Administrator

- The PJ, subrecipients, state recipients, consortia members or a contract administrator may administer the program
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement, and policies and procedures
    - Is the program being administered based upon these documents?
    - Are milestones/performance measures being met?

# Project Developer

- Owners, developers, or sponsors (including CHDOs) may develop a homebuyer project
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement and policies and procedures
    - Is the project in compliance with these documents?
    - Are milestones/performance measures being met?



# Participant Eligibility

- Areas to monitor:
  - Who's an eligible applicant? Consistent with Consolidated Plan? Marketing materials accessible?
  - What kind of assistance is available?
    - Construction financing and/or DPA and closing costs?
  - Is there a minimum credit score?
  - What are the program's front-end and back-end ratios?

# Income Eligibility

- Where to get income limits?
  - <http://www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/income>
- Areas to monitor:
  - Written agreement/procedures with subrecipients states required income definition (if applicable)
  - Application includes all household members?
  - All households signed a release (if using 3<sup>rd</sup> party)



# Income Eligibility (cont)

- Areas to monitor (cont):
  - Existing housing, determinations no older than 6 months prior to assistance (i.e., HOME written agreement)
  - New construction, determinations no older than 6 months prior to executing purchase contract
  - Lease-purchase, determinations no older than 6 months prior to executing lease-purchase agreement
  - If longer than 6 months in any case, documentation of recertification

# Exercise 3: Income Eligibility

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out





# Minimum Subsidy

- Areas to monitor:
  - Written agreement with subrecipient or CHDO (if applicable) and procedures for the program
  - IDIS PR22 indicates all homebuyer units met minimum threshold
  - Files indicate at least \$1,000/per unit
  - Pay careful attention to DPA only programs where assistance could be minimal

# Maximum Subsidy

- Where to get limit?
  - CPD rep can provide 221(d)(3) limit, OR
  - See HOMEfire Vol.9, No.4
- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Assistance at/below subsidy limit
  - Pay careful attention where construction financing and down- payment/closing costs provided

# Eligible Costs

- Where to get costs?
  - HOME Regulations 24 CFR 92.206
  - Chart in training manual, Figure 5.1
- Only eligible costs can be incurred



# Eligible Costs, cont.

- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Files, such as work write-ups/cost estimates
  - Inspections confirm only eligible costs funded by HOME
  - Check reasonableness of costs
  - Pay attention to offsite improvements (only hook ups eligible), counseling (how paid), and luxury items

# Cost Allocation

- Areas to monitor:
  - Cost allocation calculation is performed and documented in the files
  - As costs change, calculation is updated and checked against maximum subsidy limit



# Subsidy Layering

- Areas to monitor:
  - Guidelines in place for the overall program
  - Analysis worksheet is in each file
  - Sources & uses statements/Affordability analysis



# Eligible Ownership

- Areas to monitor:
  - Close out checklist and final homebuyer file should include:
    - Copy of 1<sup>st</sup> mortgage and
    - Fee simple title or deed to the property, OR, 99-year leasehold, OR other form approved by HUD



# Eligible Property Type

- Areas to monitor:
  - Files include inspection/photos indicate no more than 4 units assisted
  - Tax or other documentation indicating number of units
  - Pay attention to acquisition of 2-4 units to determine if units HOME assisted
    - Ex: if DPA provided, for only the buyer's unit or all the units?



# Property Value

- Where to get limit?
  - Ask CPD rep
  - See HOMEfire Vol.10, No.1
  - PJs can do their own calculation with HUD approval
- Areas to monitor:
  - Files document use of one of 3 approved methods
  - Methodology compared to 95% value limit
  - Pay attention to the type of activity
    - If acquisition only, typically appraisal is best documentation
    - If acquisition/rehabilitation, does appraisal include value after rehabilitation? If not, is there other documentation?

# Property Standards

- Areas to monitor:
  - Written agreement and procedures, including subrecipients and partners indicate property standard
  - Selected bids to meet rehabilitation standards and applicable codes/standards
  - Files include inspections (initial, progress & final), work-write ups, and cost estimates
  - Pay careful attention to change orders

# Construction Management

- Areas to monitor:
  - Formal sealed bid documentation
  - Review and approval of bids
  - Print out from excluded parties listing from the web
  - Lead based paint met in existing units
  - Ensure costs are reasonable and compare to cost estimates
  - Pay careful attention to projects with 12 or more HOME-assisted units to ensure Davis-Bacon requirements met

# Period of Affordability

HOME \$	Affordability
< \$15,000	5 yrs.
\$15,000 - \$40,000	10 yrs.
Over \$40,00	15 yrs.

- Affordability period will depend upon the provision chosen (e.g., Resale or Recapture – see next few slides)

# Period of Affordability (cont)

- Two options to secure unit for period of affordability:
  - Recapture (“sell to anyone, but pay back the subsidy”)
    - Provide Direct Subsidy to Homebuyer
    - Must have an amount that can be recaptured
    - If pure grant, then must use resale
  - Resale (“sell to low-income buyer, at affordable price”)
- Homebuyer must occupy the unit as its principal residence

# Resale

- Affordability period based on total HOME investment in the property
- Resale basics:
  - Home must be affordable to a reasonable range of low-income buyers
  - New buyer must be low-income
  - New buyer must occupy house as principal residence
  - Original buyer must receive a “fair return”
  - Remaining resale restrictions apply to new buyer OR
  - Can also provide additional HOME assistance to the new buyer and compliance periods for the unit starts anew

# Resale (cont)

- Areas to monitor:
  - Written agreement for appropriate resale language
  - Covenants or deed restrictions running with the land that were executed and recorded
  - If properties were resold, ensure file includes:
    - Income eligibility of new buyer
    - Determination of affordable price (in accordance with PJ's policies)
    - Fair return calculation (in accordance with PJ's policies)

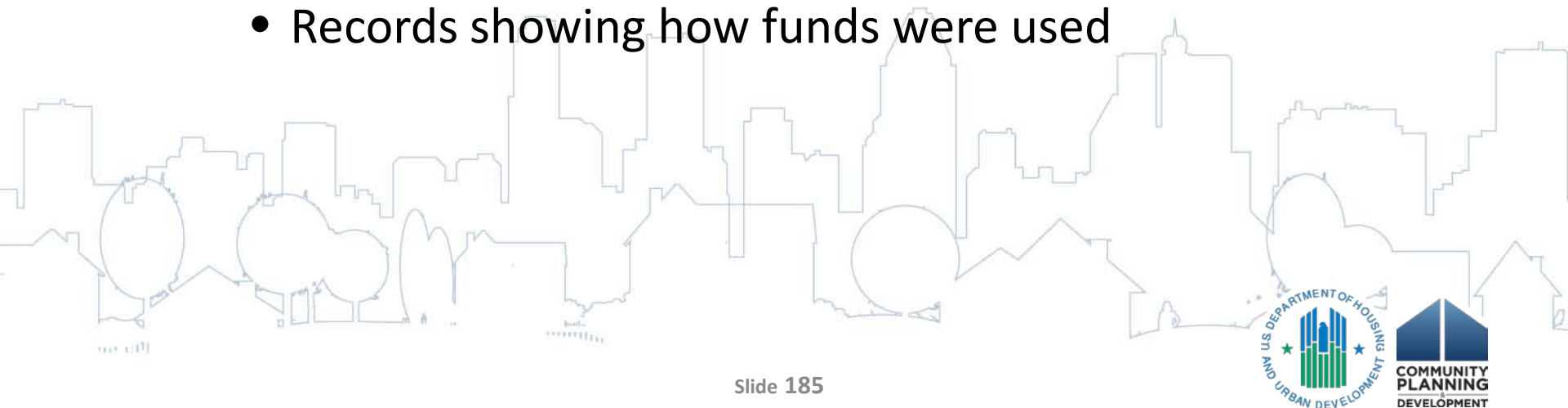
# Recapture

- Affordability period based on direct subsidy
- Four options for Recapture in regulations:
  1. Recapture amount of direct HOME subsidy to the homebuyer
  2. Forgive direct HOME subsidy pro-rata over the affordability period
  3. Proportionately share net proceeds
  4. Allow buyer to recover his/her initial investment first
- Any option chosen must be subject to net proceeds



# Recapture (cont)

- Areas to monitor:
  - Written agreement for appropriate recapture language
    - Which recapture option, subject to net proceeds
  - If properties are sold:
    - Look for calculation of repayment against PJ's policies
    - Copy of check
    - Records showing how funds were used



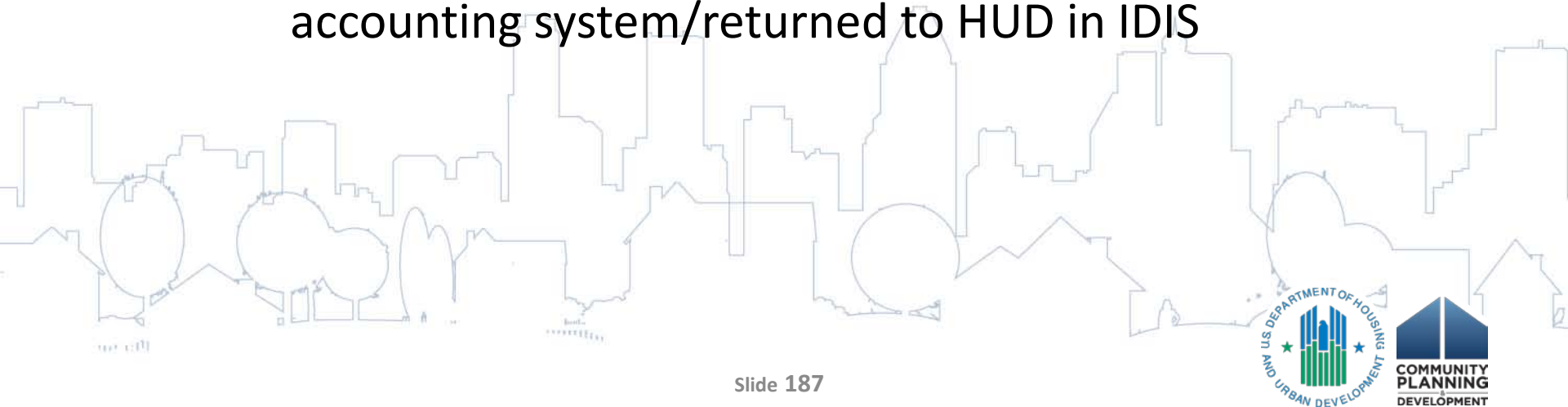
# Principal Residence

- Areas to monitor:
  - Written agreement
    - Principal residence requirement
    - Penalties for violation (i.e., repayment of HOME funds)
  - Annual monitoring using:
    - Certified letter (best)
    - Auditor's website
    - Hazard insurance



# Principal Residence (cont)

- Areas to monitor (cont):
  - If principal residence is violated (i.e., unit is rented out), document:
    - PJ/subrecipient tried to get the homebuyer to reoccupy the HOME-assisted unit, or
    - HOME funds were repaid and tracked in local accounting system/returned to HUD in IDIS



# Exercise 4: Homebuyer Written Agreement

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table (multiple tables, given funding level)
- Designate spokesperson to report out



# Typical Monitoring Issues: Homebuyer

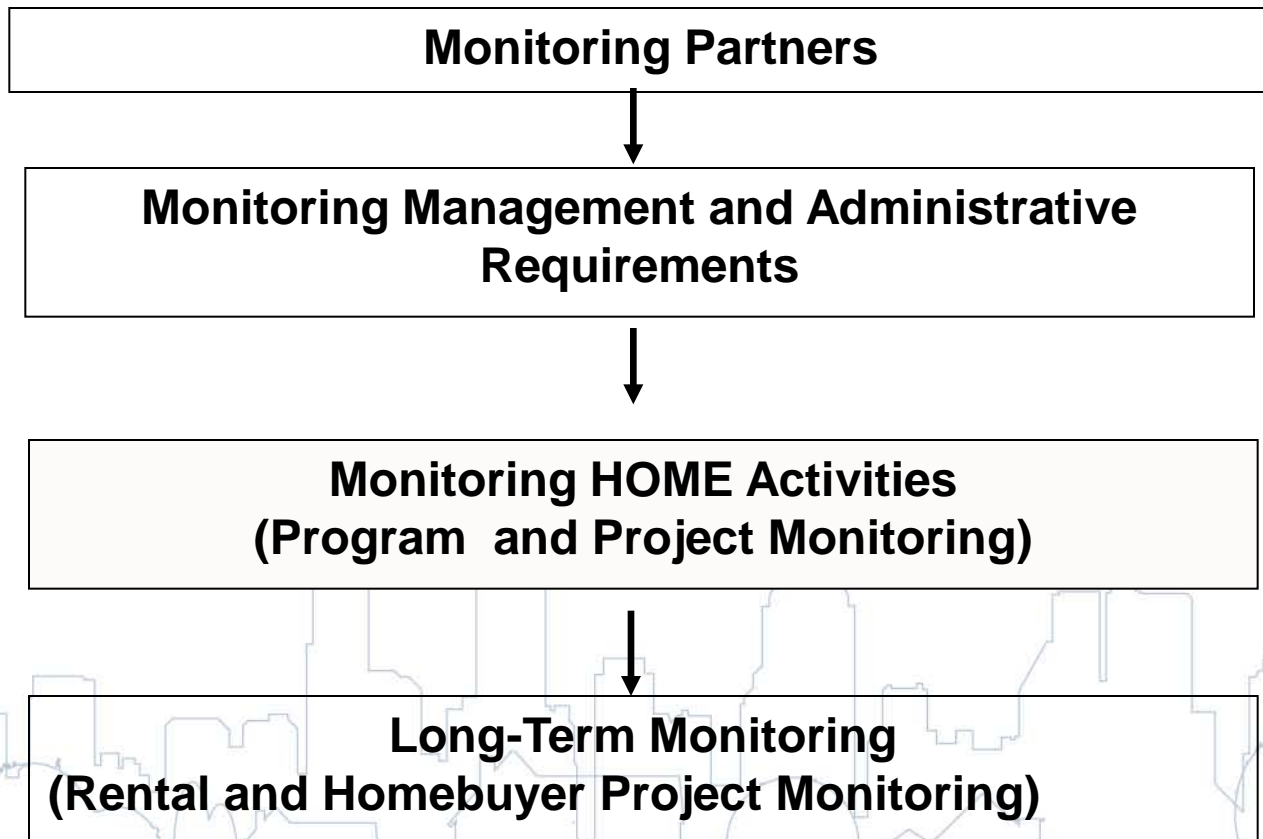
- Principal residency not monitored
- Resale and recapture language used in same written agreement
- Resale or recapture provision written in unclear fashion
- Recapture provision not explained correctly and/or missing net proceeds
- Fair return not provided under resale



# **Tenant Based Rental Assistance (TBRA) Programs (Chapter 7)**

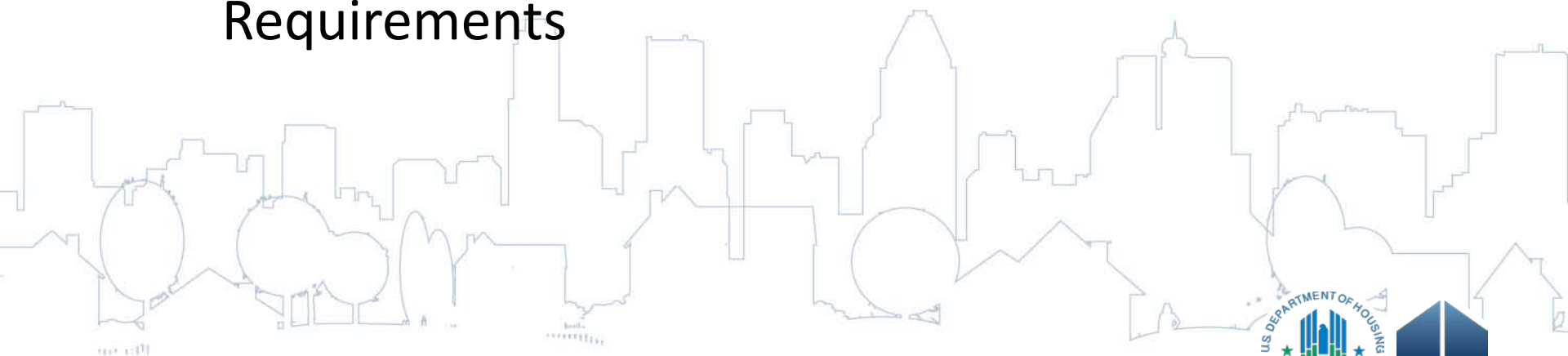


# Overview of Monitoring Process



# Overall Monitoring Framework

- Activity specific monitoring
  - Chapter 7: TBRA programs
- Subrecipient specific monitoring
  - Chapter 2: Partners
  - Chapter 3: Management and Administrative Requirements



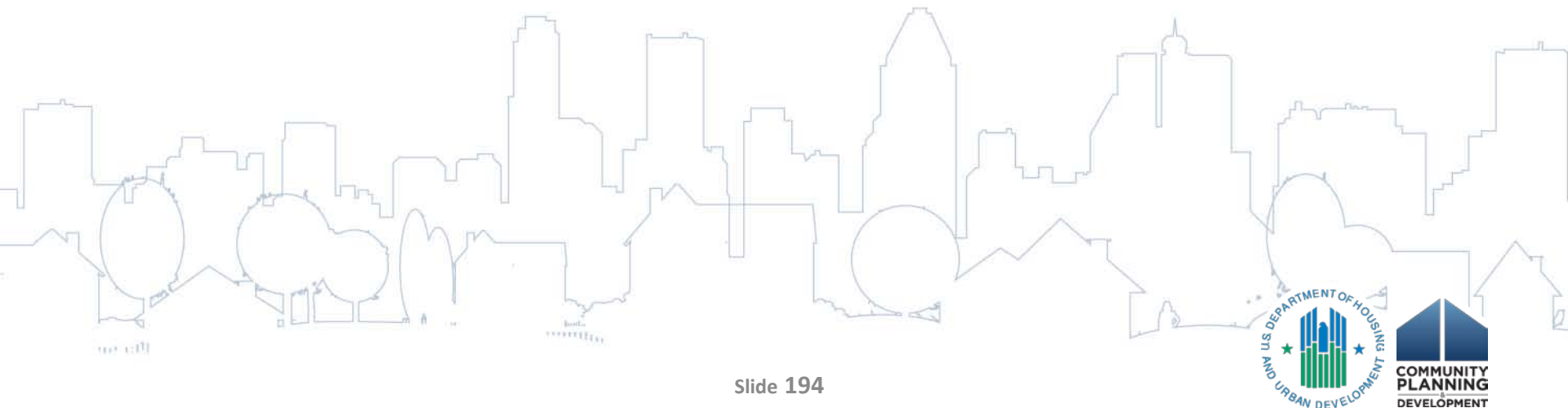


# Manual Attachments

- Attachment 7-A: *Guidance on Calculating Rental Assistance for Certificate and Voucher Programs*
- Attachment 7-B: *Client File Form – Tenant-based Rental Assistance Programs*
- Attachment 7-C: *Summary of Key HOME Rules for TBRA and How to Document*

# Manual Attachments (cont)

- Attachment 7-D: *Summary of Other Federal Requirements for TBRA Programs*
- Attachment 7-E: *Summary of Lead-based Paint Requirements for TBRA Programs*



# TBRA Key Monitoring Topics

- Program administrator
- Participant eligibility
- Type of assistance
- Minimum payment and maximum subsidy
- Program rule



# TBRA Key Monitoring Topics (cont)

- Income eligibility
- TBRA contract
- Unit designation
- Leases
- Initial and ongoing requirements



# Program Administrator

- The PJ, subrecipients, state recipients, consortia members or contract administrator may administer the program
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement, and policies and procedures
    - Is the program being administered based upon these documents?
    - Are milestones/performance measures being met?
  - Pay attention to PHA programs operated along side HOME-funded TBRA

# Participant Eligibility

- Areas to monitor:
  - Who's an eligible applicant? Marketing materials accessible?
    - Same as all the other activities
  - Are there preferences? Are they documented in the consolidated plan?
  - What kind of assistance is available?
    - Rental assistance, security deposits, and/or utility assistance?

# Participant Eligibility (cont)

- Areas to monitor (cont):
  - Is there a minimum credit score? Is there a background check required?
  - Are prior landlords checked for references?
  - Are screening criteria applied equally to all applicants of the program?
  - Do individuals maintain their place on the section 8 waiting list?

# Type of Assistance

- Areas to monitor:
  - Written agreement and procedures
  - Beneficiary files match type of assistance (e.g., rent, utility or security deposit)
    - If utility, provided only in conjunction with rent or security deposit
  - Evaluate program model for compliance (e.g., voucher or certificate)

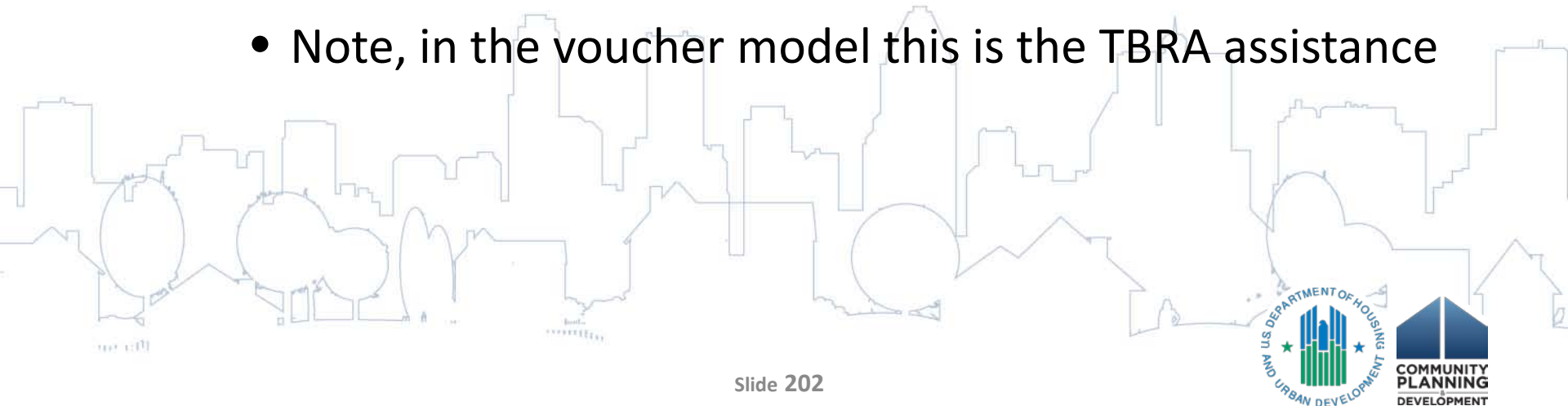


# Type of Assistance (cont)

- Areas to monitor:
  - Verify payment standard calculated correctly
    - Under voucher, used to determine subsidy
    - Under certificate, unit rent plus utilities cannot exceed the payment standard
  - Check rent is reasonable
    - Certificate – payment standard determines rent reasonableness
    - Voucher – PJ should determine reasonable rent and compare actual rent to it
  - Check correct utility allowances used
    - Compare utility allowances to PHA schedule

# Minimum Payment & Maximum Subsidy

- Areas to monitor:
  - Ensure a minimum tenant payment has been established in the program
  - Maximum subsidy is no greater than
    - The difference between 30% of the household's income for rent/utilities and the payment standard
    - Note, in the voucher model this is the TBRA assistance



# Program Rule

- Areas to monitor:
  - Written agreement, procedures, beneficiary files
    - 90% of households assisted with HOME rental and TBRA must have incomes at/below 60% of MFI
  - Pay careful attention to income targeting of TBRA programs, particularly those newly funded
  - IDIS data
    - PR16 provides income for completed units

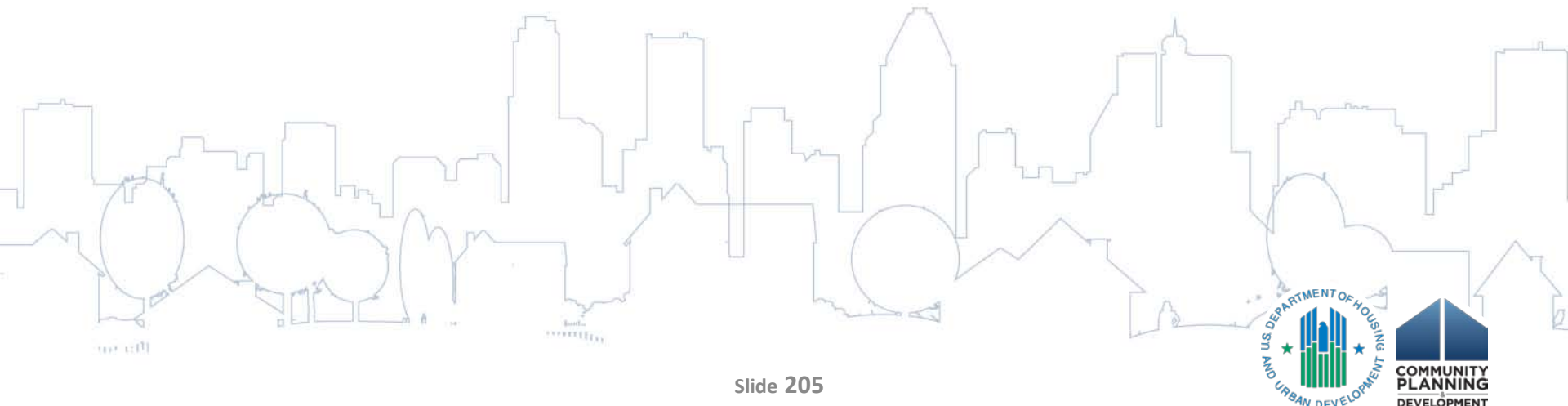


# Income Eligibility

- Where to get income limits?
  - <http://www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/income>
- Areas to monitor:
  - Same as other activities on definition and documentation
  - Timeframe from determination to HOME assistance (e.g., the TBRA contract) must not be longer than 6 months
  - If longer than 6 months, documentation of recertification

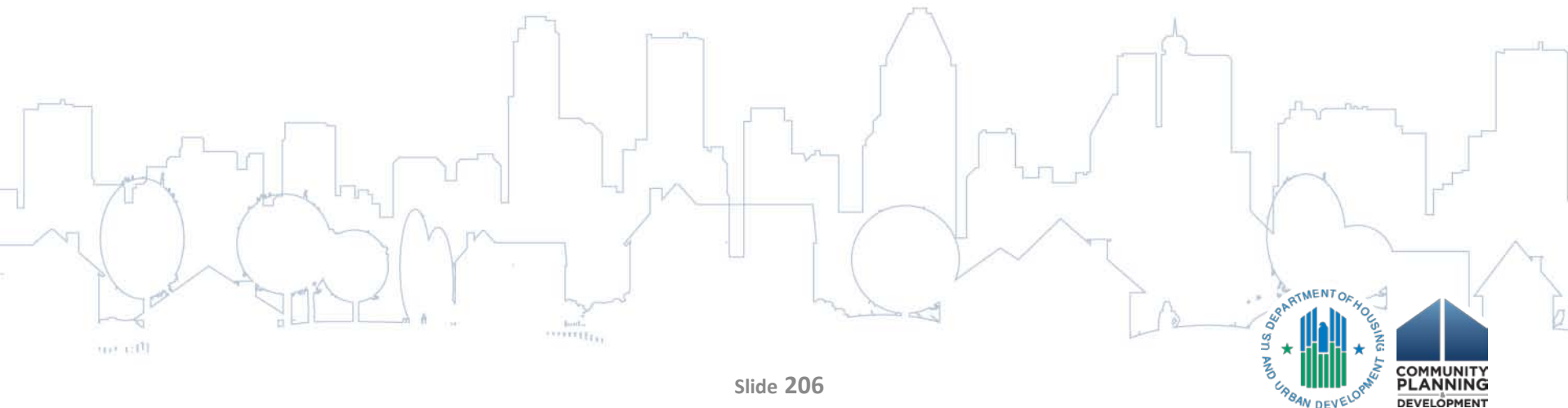
# TBRA Contract

- Areas to monitor:
  - TBRA assistance is correct in contract
  - Assistance coincides with lease period (depending upon with whom contract is executed)
  - TBRA assistance is not for more than 24 months



# TBRA Contract (cont)

- Areas to monitor (cont):
  - Security deposit contracts are for no longer than two months of assistance
  - Utility deposit assistance provided with either security deposits or rental assistance



# Unit Designation

- Areas to monitor:
  - Unit is eligible – either private or public okay, but must be “rental”
  - HQS inspections completed initially and annually
  - Size of unit is appropriate for household



# Leases

- Areas to monitor:
  - Check term is for at least 1 year
  - Rents are correct and as applicable, TBRA assistance provided
  - No prohibited provisions in the lease
  - Termination must be for lease violation





# Ongoing TBRA Responsibilities

- Annual inspection of units
- If children under age 6, visual assessments for lead
- Check unit size appropriate for households (occupancy standards)
- Review rent increases & utility payments
- Recertify household income annually

# Typical Monitoring Issues: TBRA Programs

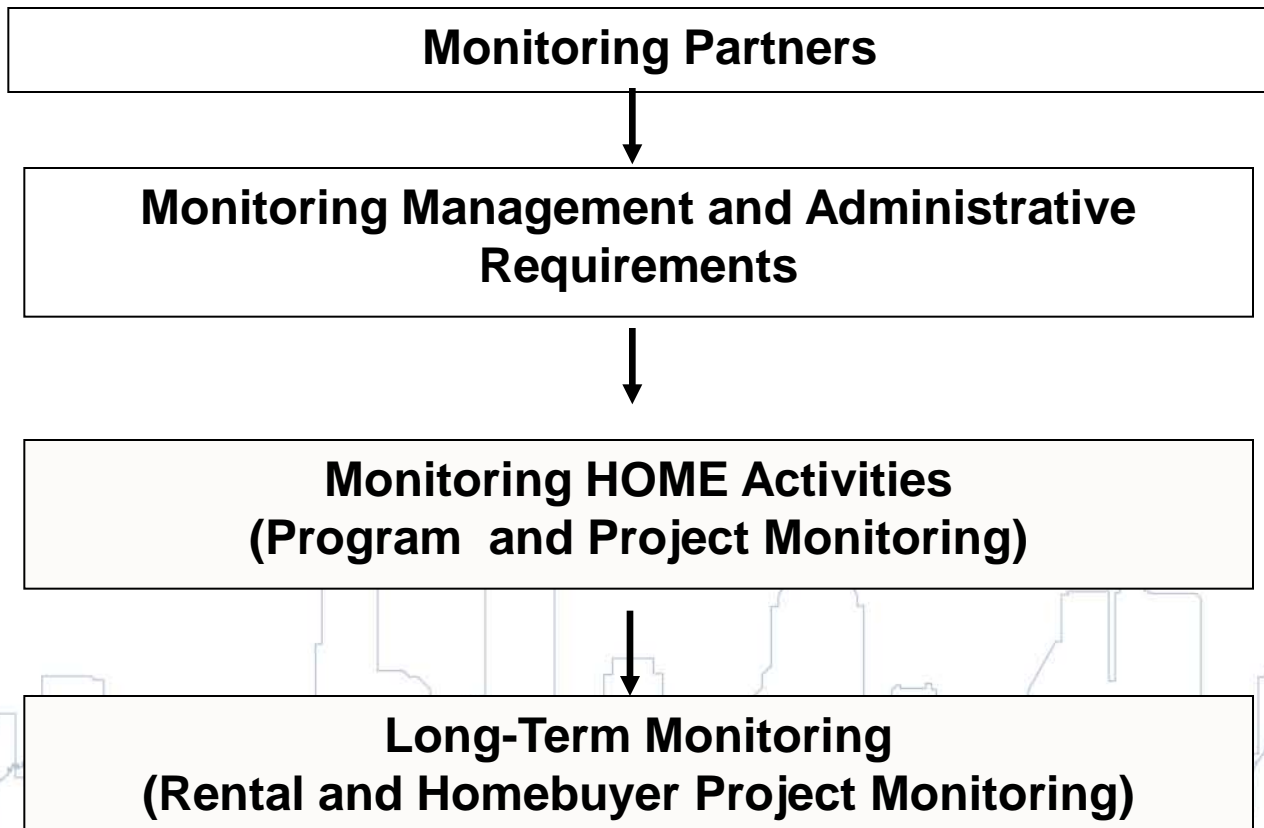
- Use of preferences without documentation in the Consolidated Plan
- Lack of understanding on the certificate and voucher models
- Payment standard not updated annually
- Calculation errors in adjusted income, tenant payment, and subsidy



# Rental Programs (Chapter 6)



# Overview of Monitoring Process



# Overall Monitoring Framework

- Activity specific monitoring
  - Chapter 6: Rental programs
- CHDO specific monitoring
  - Chapter 2: Partners
- Subrecipient specific monitoring
  - Chapter 2: Partners
  - Chapter 3: Management and Administrative Requirements

# Manual Attachments

- Attachment 6-A: *Client File Form – Rental Programs*
- Attachment 6-B: *Summary of Key Rental Program Rules and How to Document*
- Attachment 6-C: *Summary of Other Federal Requirements that Apply to Rental Programs*

# Manual Attachments (cont)

- Attachment 6-D: *Summary of Lead-based Paint Requirements for Rental Programs*
- Attachment 6-E: *HOME Rental Compliance Form*
- Attachment 6-F: *Maintaining Unit Mix Flow Chart*



# Rental Key Monitoring Topics

- Program/project administrator
- Eligible property types
- Eligible costs
- Minimum and maximum subsidy
- Subsidy layering
- Property standards
- Construction management



# Rental Key Monitoring Topics (cont)

- Participant eligibility
- Income eligibility
- Program and Project Rule
- HOME Rents
- Unit designation
- Leases
- Long-term affordability

# Program Administrator

- The PJ, subrecipients, state recipients, consortia members or a contract administrator may administer the program
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement, and policies and procedures
    - Is the program being administered based upon these documents?
    - Are milestones/performance measures being met?

# Project Developer

- Owners, developers, or sponsors (including CHDOs) may develop a rental project
- Areas to monitor:
  - Application to the PJ (if applicable), written agreement and policies and procedures
    - Is the project in compliance with these documents?
    - Are milestones/performance measures being met?
  - Pay attention to projects with HOME and multiple sources of funding

# Eligible Property Type

- Areas to monitor:
  - Review agreements and project files to ensure properties are eligible
    - If HOPE VI, is there HUD approval? Are rents the HOME rents?
  - If special needs
    - Analyze files to ensure leases are in place
    - Review terms to ensure services are not mandatory

# Eligible Costs

- Where to get costs?
  - HOME Regulations 24 CFR 92.206
  - Chart in book, Figure 6.2
- Areas to monitor:
  - Written agreement and procedures, including subrecipients
  - Files, such as work write-ups/cost estimates
  - Inspections confirm only eligible costs HOME-funded
  - Check reasonableness of costs
  - Pay attention to offsite improvements (only hook ups eligible), and swimming pools and free standing community buildings (both ineligible)

# Minimum Subsidy

- Areas to monitor:
  - Written agreement with subrecipient or CHDO (if applicable) and procedures for the program
  - IDIS PR22 indicates all rental projects met minimum threshold
  - Files indicate at least \$1,000/per unit
  - Pay attention to small projects that involve few HOME funds

# Maximum Subsidy

- Where to get limit?
  - CPD rep can provide, OR
  - See HOMEfire Vol.9, No.4
- Areas to monitor:
  - Ensure maximum subsidy limit is not exceeded
  - Review files where there are a lot of change orders
  - Pay careful attention to files to ensure cost allocation is done correctly

# Cost Allocation

- Areas to monitor:
  - Cost allocation calculation is performed and documented in the files
  - As costs change, calculation updated, checked against maximum subsidy limit
  - Pay attention to scattered site and multi-unit rental properties within the same project
  - Pay careful attention to cost allocation for non-comparable units
    - The appropriate percentage of HOME common space must be included



# Subsidy Layering

- Areas to monitor:
  - Ensure guidelines are in place (use CPD Notice 98-01)
  - Ensure analysis completed prior to commitment of funds
  - Verify project gap was determined correctly
  - Look at:
    - Sources and uses statements
    - Budgets
    - Proformas
    - Return on investment calculations

# Property Standards

- Areas to monitor:
  - Written agreement and procedures, including subrecipients and partners indicate property standard
  - Selected bids to meet rehabilitation standards and applicable codes/standards
  - Files include inspections (initial, progress & final), work-write ups, and cost estimates
  - Pay careful attention to change orders

# Property Standards, cont.

- During period of affordability
  - Maintenance records indicate common areas and units are repaired quickly
  - Reserves used for maintenance
  - Documentation of work performed meets HQS, lead and accessibility requirements
  - Property inspections completed within frequency required



# Construction Management

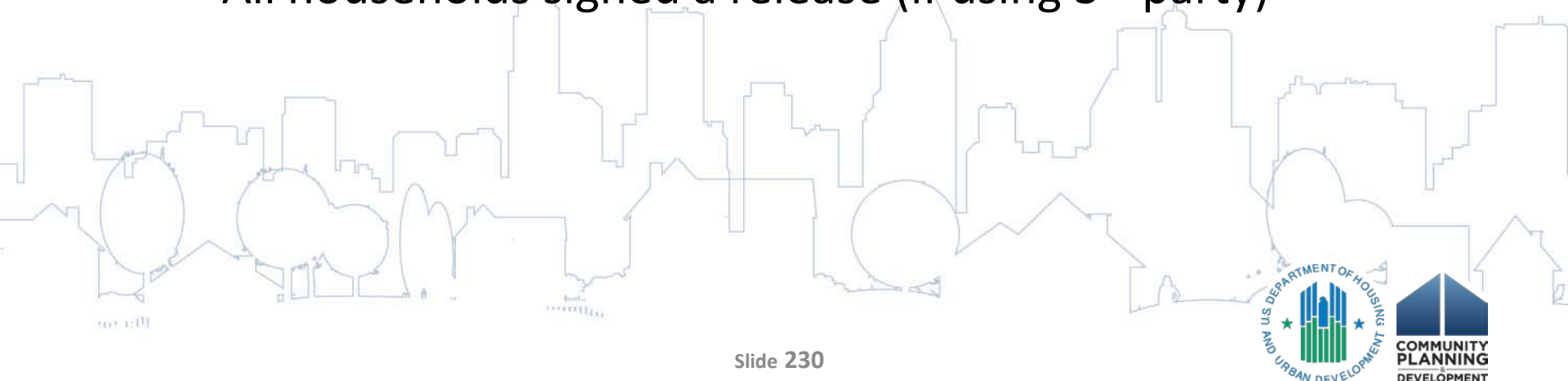
- Areas to monitor:
  - Written agreement and procedures, including subrecipients and partners indicate property standard
  - Selected bids to meet rehabilitation or construction standards and applicable codes/standards
  - Files include inspections (initial, progress & final), work-write ups, and cost estimates
  - Pay careful attention to change orders
  - Pay careful attention to projects with 12 or more HOME-assisted units to ensure Davis-Bacon requirements met

# Participant Eligibility

- Areas to monitor:
  - Who's an eligible applicant? Consistent with Consolidated Plan? Marketing materials accessible?
  - Is there a minimum credit score? Is there a background check required?
  - Are prior landlords checked for references?
  - Are screening criteria applied equally to all applicants?

# Income Eligibility

- Where to get income limits?
  - <http://www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/income>
- Areas to monitor:
  - Written agreement/procedures with subrecipients states required income definition (if applicable)
  - Application includes all household members?
  - All households signed a release (if using 3<sup>rd</sup> party)



# Income Eligibility (cont)

- Areas to monitor (cont):
  - Timeframe from determination to HOME assistance (e.g., the lease) must be no longer than 6 months or document recertification
  - Recertification must be done annually, options include:
    - Source documentation
    - Self certification
    - Another governmental entity (e.g., PHA) calculates income for the household
  - At least every 6<sup>th</sup> year of the period of affordability, source documentation

# Program Rule

- Areas to monitor:
  - Written agreements indicating initial income targeting for HOME units
  - Occupancy reports for the property
    - Review initial lease up for compliance
  - SNAPSHOT
    - Indicates income of completed rental units
  - IDIS data
    - PR16 shows completed units



# Project Rule

- Areas to monitor:
  - Written agreements indicating income targeting for HOME units and the Low HOME rent for these units
  - Occupancy reports for the property
    - Review initial lease up and each year afterward for compliance
  - SNAPSHOT
    - Indicates income of completed rental units
  - IDIS data
    - PR16 shows completed units

# HOME Rents

- Where to get rents?
  - <http://www.hud.gov/offices/cpd/affordablehousing/reports/>
- Areas to monitor:
  - Written agreements, policies and procedures, and deed restrictions
  - Occupancy reports
  - Utility allowances must be current and deducted from gross rent

# HOME Rents (cont)

- Areas to monitor (cont):
  - Pay particular attention if other subsidies involved that rules were followed
  - Review for appropriate number of units rented at or below Low HOME rent
  - Check rents, income limits, and utility allowances to project owners annually



# Unit Designation

- In projects that are not 100% HOME assisted, units are either:
  - **Fixed:** units are always the same throughout the period of affordability
  - **Floating:** units float throughout comparable bedroom sizes
- Areas to monitor:
  - Unit mix maintained annually
  - As income of tenants go up, unit mix requirements followed and rents adjusted

# Fixed Units: Tenant Income Increases

- Tenant income in Low HOME Rent unit goes above 50% but remains  $\leq 80\%$  of AMI:
  - Rent next vacant HOME-assisted unit at Low HOME rent, OR
  - Can re-designate existing High unit to Low if occupied by very low income (VLI) household
- Once VLI/Low HOME Rent requirement met, then existing tenant rent may change to High HOME rent level - subject to lease terms
- Areas to monitor:
  - Swap between High and Low unit occurs
  - Rent changes after unit swap and as lease permits

# Fixed Units: Tenant Income Increases (cont)

- If income of a tenant in a fixed HOME unit exceeds 80% of AMI:
  - Tenant may remain in HOME-assisted unit BUT
  - Tenant must pay rent equal to 30% of adjusted monthly income
- If need Low HOME unit, next available High HOME unit rents to VLI at Low HOME rent
- If need High HOME unit no action until over-income tenant moves out
- Areas to monitor:
  - Rent changes as lease permits
  - Unit swaps if Low HOME units needed

# Floating Units: Tenant Income Increases

- If income of tenant in Low HOME Rent unit increases above 50% but remains  $\leq$  80% of AMI:
  - Remain temporarily out of compliance until comparable HOME-assisted unit is available
  - Do not look to market rate unit unless project has insufficient total number of HOME units
    - Owner must have the correct number of HOME units, not more
- Areas to monitor:
  - Unit swap of High HOME to Low HOME rent
  - Rent of existing tenant changes (to High HOME) after unit swap and as lease permits

# Floating Units: Tenant Income Increases (cont)

- When existing household becomes over income (over 80% AMI):
  - Must increase rent to 30% of adjusted gross income, capped at market rent for comparable, unassisted unit
  - Project remains temporarily out of compliance until next available, comparable, non-assisted unit substituted
- Areas to monitor:
  - Rent changes as lease permits
  - Unit swap of market rent to HOME rent



# Leases

- Areas to monitor:
  - Check term is for at least 1 year
  - Rents are correct and as applicable, TBRA assistance provided
  - No prohibited provisions in the lease
  - Termination must be for lease violation



# Long-Term Affordability

HOME \$	Affordability
< \$15,000	5 yrs.
\$15,000 - 40,000	10 yrs.
Over \$40,00 (or refinancing of any \$)	15 yrs.
New construction of any \$	20 yr

# Long-Term Affordability (cont)

- Areas to monitor:
  - Occupancy reports collected and reviewed annually
  - Documentation of on-site monitoring
    - Inspections as well as review of beneficiary files (depending upon number of total units)
      - 1-4 units, every 3 years
      - 5-25 units, every 2 years
      - 26+ units, every year

# Exercise 5: Rental Compliance

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out



# Typical Monitoring Issues: Rental Programs

- Project not managed to the requirements of the HOME written agreement
- Property owners unaware of HOME rules
- Income eligibility calculated incorrectly
- Rents calculated incorrectly and/or using other program rent (e.g., LIHTC)
- PJs do not send annual rent and income limits to property owners

# Typical Monitoring Issues: Rental Programs (cont)

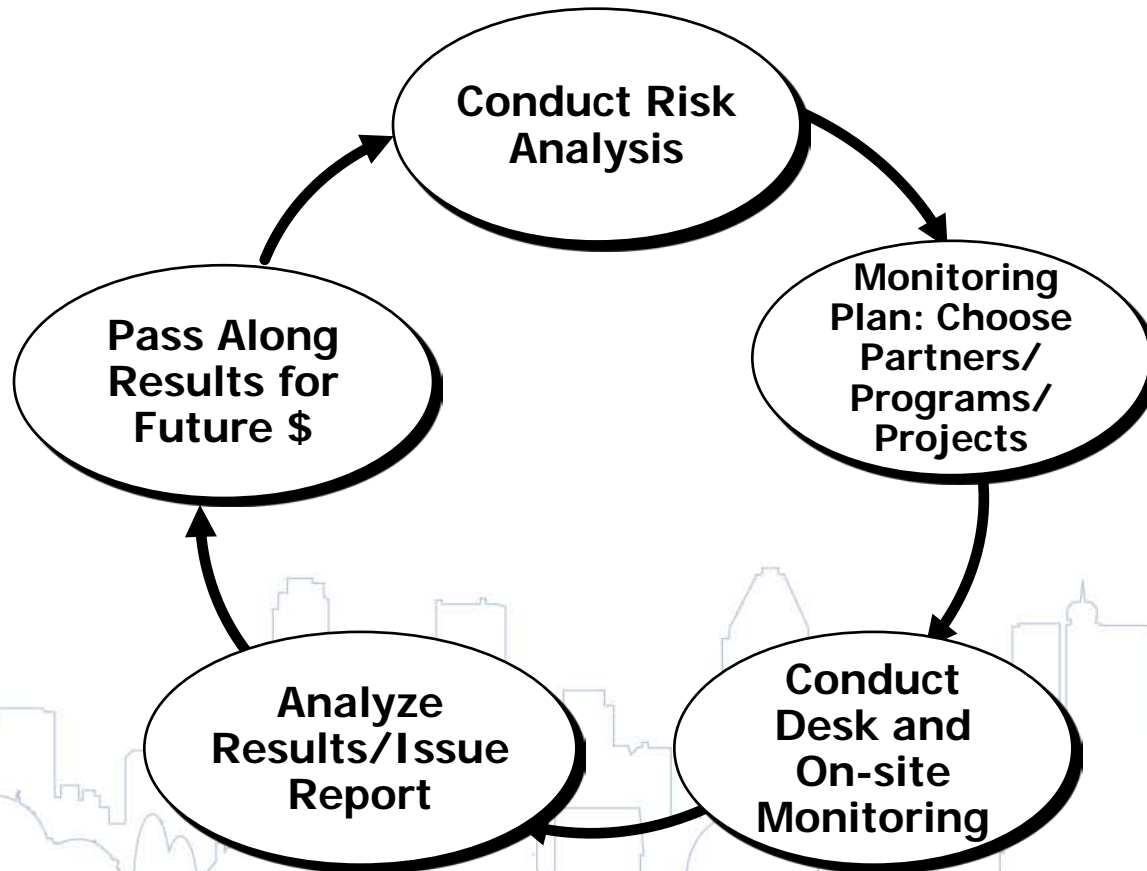
- Annual occupancy reports are either not provided or incomplete
- Unit mix is not properly maintained
- Maintenance issues over time, often leading to distressed properties
- Inadequate maintenance reserves, inability of project to pay off debt and cash flow issues



# **Analyzing and Implementing Monitoring Results (Chapter 1)**



# HOME Monitoring Life Cycle





# Exercise 6: Improving Your Monitoring Plan

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out



# Monitoring Issues – What Do you Do?

- You've just uncovered a lot of issues during monitoring
- What if you found a non-compliant program or project?
- What are some reasonable steps you could take to correct the situation?



# Analyzing Results

- Hold a staff meeting or work with manager on on-site monitoring results
- Research any regulatory compliance areas as necessary
- Identify concerns and findings (see next slide) and the corrective actions
- Determine bad as well as good compliance

# Analyzing Results (cont)

- Findings
  - Major deficiency in program performance
  - Based on statutory or regulatory requirement violation
  - PJ (or HUD) authorized to apply sanctions or other corrective actions
- Typical findings
  - Violation of written agreement
  - Incorrect income determination
  - Funds spent on ineligible costs

# Analyzing Results (cont)

- Concerns
  - Deficiency in program performance
  - Not based on statutory or regulation requirement
- Typical concerns
  - Policies and procedures are not followed/up to date
  - Lack of trained staff on the HOME program
  - Inadequate documentation on comparing to HOME subsidy/value limits

# Analyzing Results (cont)

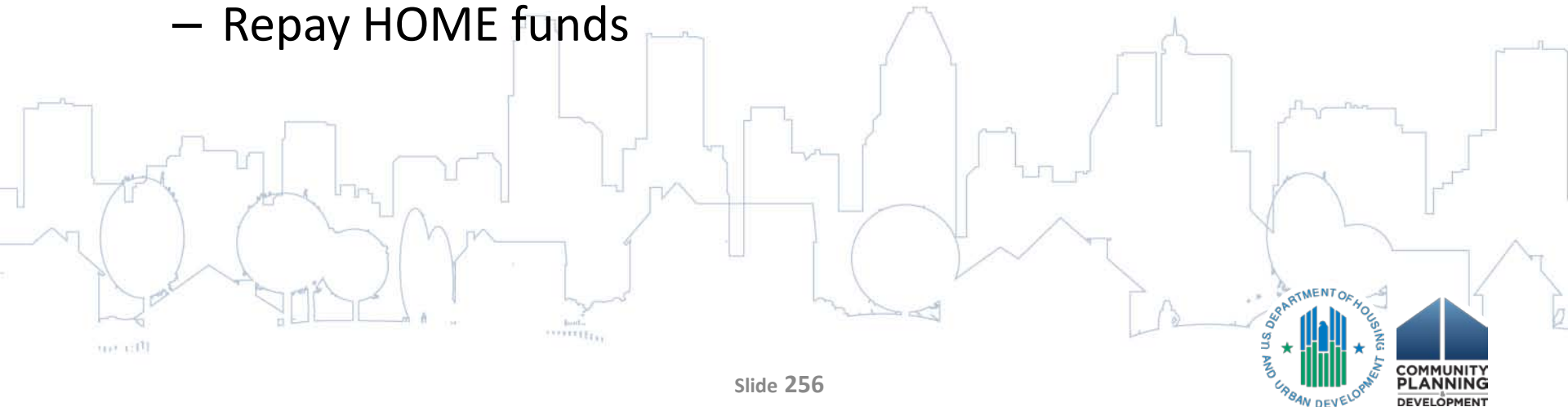
- Observations
  - Areas where partners can improve program performance
- Typical observations
  - High staff turnover
  - Stalled or delayed program/project
  - Staff unable to go to HOME trainings
  - Messy, unorganized files
  - Complaints received about program/project (not related to regulatory issues)

# Analyzing Results (cont)

- Corrective actions
  - Steps taken to correct instances of noncompliance, poor management, or poor performance
  - Corrects findings that are violations of the HOME statute or regulations
  - May be required for other deficiencies (concerns and observations) as necessary

# Analyzing Results (cont)

- Sample corrective actions
  - Require adoption of policies and procedures on deficient area or provide sample language
  - Mandate on-site technical assistance or training
  - Freeze funds in existing written agreement
  - Withhold funds in existing written agreement
  - Repay HOME funds





# The Monitoring Report/Letter

- Monitoring report should include:
  - Program or project elements reviewed
    - Subrecipients – program reviewed and if applicable, HOME program year
    - Owners, developers, sponsors – project name and beneficiary addresses
  - Reasons underlying all conclusions
    - How conclusions were drawn, frequency, severity
  - Reference specific section of HOME regulations on topic (e.g., 24 CFR 92.203 for income eligibility)

# The Monitoring Report/Letter (cont)

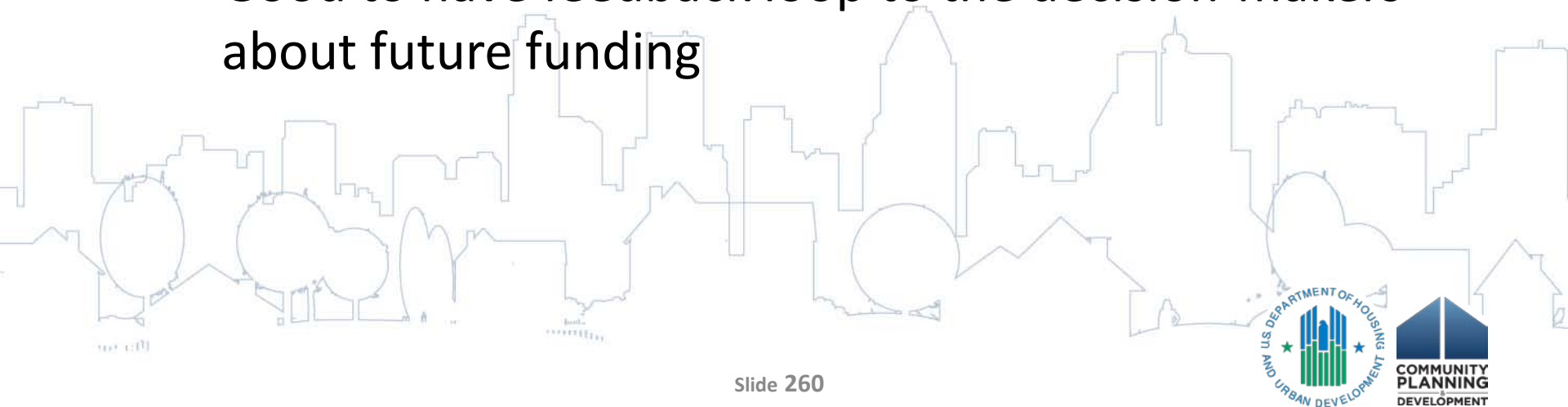
- Monitoring report should include:
  - Findings, concerns, and observations in constructive tone and format
    - Explain the issue fully – what was found? why is it a finding, concern, etc?
    - Use words such as “it appears” or “based upon files reviewed”
  - Deadlines for responses and completion of corrective actions
    - What action is required
    - What date is action due by

# Follow Up

- After sending report, PJ should:
  - Follow-up with phone call (and document)
  - Send second letter if no response
  - Call Executive Director or other highly ranked official, if no response
  - Get legal department involved if necessary
- If on-site follow up required
  - Set up second monitoring visit to document corrective actions met
  - If applicable, re-inspect all work to ensure compliance

# Follow Up (cont)

- Once corrective action completed, PJ should :
  - Document file that corrective actions completed
  - Send a close out letter stating corrective actions satisfy requirements and process closed
- Share results with other staff/team members
  - Good to have feedback loop to the decision-makers about future funding



# Exercise 1: Monitoring CHDO Qualification: Part II

- Turn to exercise tab in manual
- Read directions thoroughly
- Work as a table
- Designate spokesperson to report out



# Training Wrap Up

- Develop “to do” list items for when you return to your office
- Identify people with whom to consult about what you learned this week
- Work with colleagues on monitoring plan, system, and tools
- Identify additional staff or partnerships to create to help with monitoring workload

# The End

- Thanks for being great participants
- Use your manual as a reference tool
- Use your checklists as a starting point for programs and projects but remember to customize them as needed
- Go forth and monitor!

Thanks!