**PURPOSE**: To assess management and oversight of multifamily housing projects.

**INSTRUCTIONS:** This form is to be completed by HUD staff, Performance Based Contract Administrators (PBCA), Traditional Contract Administrators (CAs) and Mortgagees of Coinsured Projects (Mortgagees). The Management Review form consists of three parts: Desk Review, On-site Review with Addenda, and Summary Report. All Reviewers of subsidized projects must complete all Addenda (A, B, C & D). Reviewers of unsubsidized projects must complete Addenda B & C only. If any questions on any given form are not relevant to the program under review or if the information is not available, notate with “N/A”. Additional guidance regarding the management process can be found in HUD Handbooks 4350.1, REV-1 and 4566.2.

### A. Prior to On-Site Review

Complete Part I – Desk Review

* To complete the Desk Review worksheet prior to the on-site visit, review the project files, system reports, other documents, and contact the HUD representative for any unavailable information needed to complete the desk review. This portion of the review will assist the Reviewer in identifying potential problem areas. HUD staff must complete the entire Desk Review for subsidized projects. For unsubsidized projects, HUD staff/mortgagees must complete all applicable sections. CAs must complete the entire Desk Review except where noted “This question applies only to HUD Staff/Mortgagees.”
* Schedule a date for the on-site review with the owner/agent and confirm the review date in writing. The owner/agent should be given at least a two-week notice in writing and notified of the documents that need to be available the day of the review, as specified in Addendum C. Addendum C provides a list of documents notated by the Reviewer that the owner/agent must have available during the on-site review. Addendum C and Part A of Addendum B must be forwarded to the owner/agent with the letter confirming the scheduled on-site review. The Reviewer may request additional items as necessary.

**B. Conducting the On-Site Review**

Complete Part II – On-Site Review

* On-Site Reviews will be completed as follows:

(1) HUD staff and Mortgagees must complete all applicable questions in Part II.

(2) CAs must complete all questions in Part II except where noted “This question applies only to HUD staff/Mortgagees.”

(3) HUD staff completing a review of a project which is also reviewed by a CA will only complete questions not applicable to CAs.

* Use additional sheets as necessary to complete applicable questions.
* Upon completion of the on-site review, the Reviewer will hold a close-out session with the owner/agent to discuss observations and conclusions.

**C. After On-Site Review**

* The Reviewer will record deficiencies, findings and corrective actions. Findings must include the condition, criteria, cause, effect and required corrective action. The condition describes the problem or deficiency. The criteria cite the statutory, regulatory or administrative requirements that were not met. The cause explains why the condition occurred. The effect describes what happened because of the condition. The corrective action provides what the owner/agent must do to eliminate the deficiency. The corrective action must include a requirement that the owner determine and correct not only the discovered errors and omissions, but also describe to the Reviewer how and what systems, controls, policies and procedures were adjusted or changed to assure that the errors and omissions do not reoccur. In completing the Report of Findings, the Reviewer should also indicate the target completion date.
* Complete Summary Report as follows:

Based on the Report of Findings, the Reviewer will assess the overall performance for each applicable category. The Reviewer must indicate **A** (Acceptable) or **C** (Corrective action required) and include target completion dates (TCD) for all corrective action items. For those items not applicable, indicate “N/A” in the TCD column.

For each of the seven major categories *(A, B, C, D, E, F, and G)*, rate each category by entering a score between 1 and 100. If a section was not reviewed, enter a score of zero (0). After rating the individual categories, an overall rating must be assessed. This rating will be based upon the ratings assigned in categories A through G. CAs will rate all sections except Section D. Section D is for HUD staff and Mortgagees only. Additional guidance for ratings can be found in HUD Handbook 4350.1, REV-1.

* Distribute the Summary Report and cover letter as follows:

1. Project Owner (original)
2. Management Agent (copy)
3. HUD office for PBCA reviews rated below average or unsatisfactory
4. HUD office for all traditional CA reviews

\*A copy of the completed Management Review Report, form HUD-9834 and supporting documents must be maintained in the project file.

* If a below average or unsatisfactory rating is determined, the owner/agent must be afforded an opportunity to appeal. Guidance on appeal procedures is provided in HUD Handbook 4350.1, REV-1.
* All Secure Systems users must document all required data in the Integrated Real Estate Management System (iREMS).

**D. Management Review Deficiency Follow up:**

* Reviewer must conduct follow-up activity until all corrective actions as required in the Summary Report have been completed. Enter applicable close-out dates in iREMS.

**NOTE:** The Fair Housing and Equal Opportunity (FHEO) checklist has been included as part of this management review form; however no determination of compliance with applicable Fair Housing laws and regulations is included in the summary report. CAs must forward the original checklist (Addendum B) to HUD staff. HUD staff must maintain the original checklist in the project file and forward a copy to the Office of FHEO in the appropriate jurisdiction for review.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Date of On-Site Review: | Date of Report: | Project Number: | | Contract Number: |
| Section of the Act: | Name of Owner: | Project Name: | | Project Address: |
| Loan Status:  Insured  HUD-Held  Non-Insured  Co-Insured | Contract Administrator:  HUD  CA  PBCA | Type of Subsidy: | | Type of Housing:  Family  Disabled  Elderly  Elderly/Disabled  Other (please specify) |
| Section 8  PAC  Section 236  Section 221(d)(3) BMIR | Rent Supplement  RAP  PRAC  Unsubsidized |

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **A. General Appearance and Security** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the General Appearance and Security Rating.**  **If this Section was not reviewed, enter 0.**  **is 10% of the overall score.** |
| 1. General Appearance |  |  |  |
| 2. Security |  |  |  |
| **B. Follow-up and Monitoring of Project Inspections** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating** .  **If this Section was not reviewed, enter 0.**  **is 10% of the overall score.** |
| 3. Follow-Up and Monitoring of Last Physical Inspection and Observations |  |  |  |
| 4. Follow-Up and Monitoring of Lead-Based Paint Inspection |  |  |  |
| **C. Maintenance and Standard Operating Procedures** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating**.  **If this Section was not reviewed, enter 0.**  **is 10% of the overall score.** |
| 5. Maintenance |  |  |  |
| 6. Vacancy and Turnover |  |  |  |
| 7. Energy Conservation |  |  |  |
| **D. Financial Management/Procurement** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the Financial Management/Procurement Rating.**  **If this Section was not reviewed, enter 0.**  **is 25% of the overall score.** |
| 8. Budget Management |  |  |  |
| 9. Cash Controls |  |  |  |
| 10. Cost Controls |  |  |  |
| 11. Procurement Controls |  |  |  |
| 12. Accounts Receivable/Payable |  |  |  |
| 13. Accounting and Bookkeeping |  |  |  |
| **E. Leasing and Occupancy** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the *Leasing and Occupancy Ratig.***  **If this Section was not reviewed, enter 0.**  **is 25% of the overall score.** |
| 14. Application Processing/ Tenant Selection |  |  |  |
| 15. Leases and Deposits |  |  |  |
| 16. Eviction/Termination of Assistance Procedures |  |  |  |
| 17. Enterprise Income Verification (EIV) System Access and Security Compliance |  |  |  |
| 18. Compliance with Using EIV Data and Reports |  |  |  |
| 19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance |  |  |  |
| 20. TRACS Security Requirements |  |  |  |
| 21. Tenant File Security |  |  |  |
| 22. Summary of Tenant File Review |  |  |  |
| **F. Tenant/Management Relations** | A | **C** | **TCD** | **Enter a score between 1 and 100 for the Tenant Services Rating.**  **If this Section was not reviewed, enter 0.**  **is 10% of the overall score.** |
| 23. Tenant Concerns |  |  |  |
| 24. Provision of Tenant Services |  |  |  |
| **G. General Management Practices** | A | **C** | **TCD** | **General Management Practices Rating**.  **If this Section was not reviewed, enter 0.**  **is 10% of the overall score.** |
| 25. General Management Operations |  |  |  |
| 26. Owner/Agent Participation |  |  |  |
| 27. Staffing and Personnel Practices |  |  |  |
| **Overall Rating:**  Superior  Above Average  Satisfactory  Below Average  Unsatisfactory     Overall Score:  **To calculate an overall score:** Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number.  For convenience, a utility is included with this form which will perform all of the necessary calculations. | | | | |

|  |  |
| --- | --- |
| Name and Title of Person Preparing this Report: (Please type or print): | Name and Title of Person Approving this Report: (Please type or print): |
| Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date: | Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Date: |

**NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only.**

**SUMMARY REPORT – FINDINGS**

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

* The condition describes the problem or deficiency
* The criteria cites the statutory, regulatory or administrative requirements that were not met
* The cause explains why the condition occurred
* The effect describes what happened because of the condition

Corrective actions are required for all findings.

|  |  |  |
| --- | --- | --- |
| **Item Number** | Finding | **Target Completion Date** |
|  |  |  |
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| --- |
| **PART I. DESK REVIEW –**The Reviewer must complete this section **prior** to the on-site review using all relevant information in project files and HUD database systems. Questions on the desk review, which include category references, are linked to the on-site review. Category references on the desk review that relate to the on-site review must be considered when determining the category rating. Category references are marked following the applicable question (i.e. B3, E14).  If any questions on any given form are not relevant to the program under review or if the information is not available notate with “N/A”. |

1. What is the most recent Physical Assessment Subsystem (PASS) score? **B3**

Enter PASS Score     Date of REAC inspection

If required, has the project filed a certification that all items listed on the previous REAC inspection have been completed?

If more than one inspection is of record, does the reviewer note repetitive defects?

**Yes  No**

Comments:

2. Were Exigent Health and Safety (EH&S) conditions cited in the report? **B3**

**Yes  No**

Comments:

3. Have all latent defects been corrected? ***This question applies only to newly constructed projects within the last 24 months.***

***This question applies only to HUD Staff and Mortgagees.***

**Yes  No  N/A**

If not, list depository and amount of any construction escrows remaining.

Comments:

**Questions 4 through 6 only apply to subsidized family properties or elderly properties housing children under the age of six that were constructed prior to 1978. If the lead based paint inspection has been conducted and the information was documented on a previous management review, proceed to question 7.**

4. Document the year of construction for Lead-Based Paint compliance.

***Obtain this information from the Physical Condition/PASS screen in iREMS Open the REAC Inspection Report, then open the PASS Physical Inspection Report. The year of construction can be found under Buildings/Units.***

Date of Construction       **If construction occurred after 1977, proceed to question 7.**

5. Has a lead-based paint inspection been conducted? **4B Yes  No  Information Not Available**

Comments:

6. What were the results of the Lead-Based Paint Inspection/Evaluation? **4B Yes  No**

Was lead found?

If yes, is there a HUD approved lead hazard control plan? **Yes  No**

Comments

7. Is an Annual Financial Statement required? (If no, proceed to question 10).**Yes  No**

***This question applies only to HUD Staff.***

Comments:

8. What was the most recent Financial Assessment Subsystem (FASS) score?Score

***This question applies only to HUD Staff***

If financial reporting is not required, determine why; and record the reason in reviewer comments below.

Comments:

9. Have the following reports been consistently submitted on a timely basis? (Look at multiple periods) Check the appropriate box for reports received and indicate whether or not the report.

***This question applies only to HUD Staffand Mortgagees***

Annual Audited Financial Statement **Yes**  **No  N/A**

Date last report was due:

Date last report received:

Monthly Accounting Report **Yes**  **No  N/A**

Excess Income Report (HUD-93479, 80, 81) **Yes**  **No  N/A**

Quarterly performance report for projects on flexible subsidy, modification, workout, etc.  **Yes**  **No  N/A**

Annual operating budget (cooperatives) **Yes**  **No  N/A**

If the reports have been submitted, were they received in acceptable form? **Yes**  **No**

Comments:

10. Has the owner corrected all findings on HUD financial and or Inspector General audits? **Yes  No  N/A**

***This question applies only to HUD Staff and Mortgagees.***

List findings outstanding and determine whether remedial action is required to assure correction within established goals:

Comments:

11. Do project operating expenses appear reasonable compared with similar projects?**Yes  No**

***This question applies only to HUD Staff.* D10**

Indicate latest OPIIS rating and check problem areas flagged by OPIIS.

Administrative  Maintenance Utility Taxes and Insurance Financial

Also, use OPIIS to conduct an expense comparison with other similar projects.

Comments:

12. Does annual financial analysis or FASS printouts indicate that project is free of actual or potential financial problems?

***This question applies only to HUD Staff.* Yes  No**

For each of last 3 years, enter Profit (Loss) before depreciation (from the Statement of Profit & Loss).

Year

     $

     $

     $

Comments:

13. If the owner/agent has taken unauthorized distributions, reimbursements, or supervision fees, have these been repaid?

***This question applies only to HUD Staff and Mortgagees.* Yes  No**

If no, indicate amount due to the project. $

14. If applicable, have all deposits due to the residual receipts fund been made?**Yes  No**

***This question applies only to HUD Staff.***

Comments:

15. Based on the last FASS submission, are accounts payable reasonably current?**Yes  No**

***This question applies only to HUD Staff and Mortgagees*. D12**

Indicate the amount of accounts payable more than 60 days old $

Comments:

16. Does the balance in the security deposit trust account equal or exceed the project’s liability account?**Yes  No**

***This question applies only to HUD Staff and Mortgagees.***

If no, explain how deficit will be funded.

Comments:

17. If security deposits are invested in an interest-bearing account, is interest passed through to tenants or transferred to project account?

***This question applies only to HUD Staff and Mortgagees.* Yes  No**

Comments:

18. Have the owner and managing agent executed and submitted an appropriate Management Certification (form HUD-9839A, B, or C) to HUD?

***This question applies only to HUD Staff and Mortgagees.* Yes  No**

If yes, please enter date of certification.

Determine that the content of certification is consistent with present operations.

Comments:

19. Is the management fee paid to the agent in accordance with the Management Certification?**Yes  No**

***This question applies only to HUD Staff and Mortgagees.***

Comments:

20. Has the owner and management agent executed a management agreement in accordance with the management certification?

***This question applies only to HUD Staff and Mortgagees.* Yes  No**

Comments:

21. Does the management agreement reflect HUD’s regulations and guidelines?**Yes  No  N/A**

***This question applies only to HUD Staff and Mortgagees.***

Comments:

22. Has a management entity profile been submitted to HUD? **Yes  No**

***This question applies only to HUD Staff and Mortgagees.***

If yes, is it relevant to the agent’s organization and how it operates? **Yes**  **No**

Date of the management entity profile

23. Do the Management Entity Profile and Management Certifications clearly describe the relationships and responsibilities of the owner and agent?

***This question applies only to HUD Staff and Mortgagees.* Yes  No**

Determine if management is by an identity-of-interest contractor, and compare the contract arrangement to the annual financial report.

Comments:

24. Have the principals and board members listed received HUD-2530 approval? **Yes  No  N/A**

***This question applies only to HUD Staff.***

Request a list of all current principals and board members and check for HUD-2530 approval.

Comments:

25. Is the agent charging the project for expenses which the agreement requires the agent to pay?**Yes  No**

***This question applies only to HUD Staff and Mortgagees.***

Comments:

**Questions 26 –29 apply to OAHP restructuring. If not applicable proceed to question 30.**

26. Has the project’s mortgage been restructured? **Yes  No**

***This question applies only to HUD Staff.***

If yes, is there a use agreement on the project? **Yes  No**

If there is a use agreement, does it require any owner certifications? **Yes  No**

If owner certifications are required, have they been submitted timely?  **Yes  No**

If applicable, has work required under the Rehabilitation Escrow been/is being completed according to schedule?

**Yes  No**

Comments:

27. Is the owner eligible for incentives?**Yes  No**

***This question applies only to HUD Staff.***

If yes, has the owner calculated those incentives correctly? (i.e., Capital Recovery Fee (CRF) and/or Incentive Performance Fee (IPF))

**Yes  No**

Comments:

28. Does the HUD billing statement (HUD-92771) indicate timely and accurate payments toward the Mortgage Restructuring Note?

***This question applies only to HUD Staff.* Yes  No**

Comments:

29. If an owner is in non-compliance with HUD business agreements, has the owner been notified by HUD within the required timeframes?

***This question applies only to HUD Staff* Yes  No**

Comments:

**Questions 30 through 33 apply to Section 236 projects. If this is not a Section 236 project proceed to question 34.**

30. Does the rental income generate excess income?**Yes  No  N/A**

***This question applies only to HUD Staff.***

Comments:

31. Has the owner/agent received approval to retain excess income?**Yes  No**

***This question applies only to HUD Staff.***  **D13**

Comments:

32. Was an annual report submitted for usage of retained excess income?**Yes  No**

***This question applies only to HUD Staff.* D13**

Comments:

33. Are there any delinquent excess income payments due HUD?**Yes  No**

***This question applies only to HUD Staff.* D13**

If yes, is there a payment plan? **Yes**  **No**

Comments:

34. Are rent increase requests submitted to HUD promptly when needed? **Yes  No**

***This question applies only to HUD Staff.***

Review the timing of the last three rent increase requests and the results of the requests (approval, denial or modification to requested amount),

and whether the rents are comparable to other neighboring properties. If a wide disparity exists, determine the cause of the difference.

Does owner/agent generally provide sufficient documentation for rent increases? **Yes**  **No**

Comments:

35. Are contract renewals submitted to HUD promptly when needed? **Yes  No**

Comments:

36. Complete chart below. ***(This question applies only to HUD Staff/ Mortgagees)***

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Name of Reserve | As of | | | Held in Interest Bearing Account? |
| Total | Per Unit | Monthly Deposit |
| Replacement Reserve | $ | $ | $ | **Yes**  **No** |
| General Operating Reserve (Co-ops) | $ | $ | $ | **Yes**  **No** |
| Residual Receipts | $ | $ | $ | **Yes**  **No** |
| Other | $ | $ | $ | **Yes**  **No** |

a. Do balances in replacement or general operating reserve accounts appear adequate to meet future needs? **Yes**  **No**

If not, what action is recommended?

b. Are repairs consistently paid from the appropriate operating expense account, and eligible items reimbursed from the reserves?

**Yes**  **No**

Comments:

37. Has the owner/agent performed an analysis to determine future Reserve for Replacement needs when submitting a budget based rent increase?

**Yes  No**

Comments:

38. If there is a utility allowance, what was effective date of last utility allowance adjustment?

If a utility allowance was approved was it implemented within 75 days as required by HUD? **Yes  No**

Comments:

39. What is the effective date of the last rent adjustment?

Comments:

40. Is the current approved rent schedule sufficient to meet project needs? **Yes  No**

***This question applies only to HUD Staff.***

Comments:

41. Has a special rent increase been approved? **Yes  No  N/A**

If yes, please check the appropriate box.  Insurance  Taxes  Utilities  Security  Service Coordinator

Comments:

42. Are monthly rental subsidy vouchers submitted on time? **Yes  No  N/A**

Comments:

43. Is the owner/agent submitting tenant certification data to TRACS to support the voucher billings? **Yes  No  N/A**

Comments:

44. Is the owner/agent transmitting data for Section 236 and Section 221(d)(3) BMIR tenants to TRACS as required by the automation rule?

**Yes  No  N/A**

Comments:

45. What is the term of the subsidy contract?

Date the contract term ends:

Comments:

46. List vacancy activity for the past twelve months, and indicate the number for each month. **C6.**

This information can be obtained from the TRACS Voucher Detail Summary.

|  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **JAN** | **FEB** | **MAR** | **APR** | **MAY** | **JUNE** | **JULY** | **AUG** | **SEPT** | **OCT** | **NOV** | **DEC** |
|  |  |  |  |  |  |  |  |  |  |  |  |

Does review of the EIV reports listed below include information that needs a resolution or explanation by the owner/agent? **E18c**

Income Discrepancy Report? **Yes  No  N/A**

Failed EIV Pre-Screening Report? **Yes  No  N/A**

Failed Verification Report (Failed the SSA Identity Test)? **Yes  No  N/A**

Deceased Tenant Report? **Yes  No  N/A**

Multiple Subsidy Report? **Yes  No  N/A**

Comments:

47. Is there a Neighborhood Networks Center for the project? (Check iREMS or other available source) **Yes  No  N/A**

**If no, answer “N/A” and proceed to 51.**

Comments:

48. If yes to question 49, does the Neighborhood Networks Center have a Strategic Tracking and Reporting Tool (START) Business Plan?

**Yes  No**

If yes, date HUD approved:

If no, when will a START Business Plan be completed?

Projected date for START Business Plan:

Comments:

49. Are there any unresolved findings from previous management reviews? If yes, specify in the comments section.

**Yes  No**

Comments:

50. Review complaints, congressional inquiries, etc. received within the last 12 months regarding the overall management practices.

Provide a general description below and attach applicable documentation**. G22**

|  |  |
| --- | --- |
| **Issue/Complaint** | **Status** |
|  |  |
|  |  |
|  |  |
|  |  |

**Indicate by marking the appropriate box - Yes, No, or N/A if not applicable. Provide comments as needed.**

|  |
| --- |
| ***CATEGORY A. GENERAL APPEARANCE & SECURITY*** |
| 1. General Appearance |

Based on observation, are the project’s exterior and common areas (i.e., grounds, landscaping, parking lots, playgrounds, hallways, laundry room, elevator, garbage area, stairwells, management office) clean, free of graffiti, debris and damage? **Yes  No  N/A**

If no, provide location and describe condition(s).

Comments:

|  |
| --- |
| **2. Security** |

a. Indicate whether any of the events below have been documented in the last twelve months, and the frequency of the event(s).

|  |  |  |  |
| --- | --- | --- | --- |
| **Event** | **Frequency** | **Event** | **Frequency** |
| Break-Ins |  | Arrests |  |
| Vandalism |  | Drug Activity |  |
| Auto Theft |  | Other (please specify): |  |
| Personal Assaults |  | None |  |

Comments:

b. Indicate which types of security measures, if any, are utilized on site.

Tenant Patrol  Volunteer Organization Paid Car Patrol  Paid on-site Guard

Police Patrol  TV Monitor  Drug Free Housing Plan  Security Cameras

Motion Sensors  Crime Prevention Plan  Community Policing

Other (please specify)        None

Comments:

c. Based on the answers provided in questions a and b above, what corrective actions, if any have been taken by the owner/agent?

Comments:

d. Has the owner/agent requested a rent increase based on increases in security costs? **Yes  No**

If yes, indicate security measures taken.

Comments:

|  |
| --- |
| ***B. FOLLOW-UP & MONITORING OF PROJECT INSPECTIONS*** |
| **3. Follow-Up & Monitoring of Project Inspections and Observations (Sampling is at reviewer’s discretion to respond to questions a and b below)** |

a. Based on a sampling, if EH&S items were identified have the deficiencies been corrected and documented according to the owner/agent’s certification for the most recent REac inspection? **Yes  No  N/A**

If no, provide an explanation.

Does the analysis show any repetitive or systemic problems? **Yes  No**

Comments:

b. Based on a sampling of units and common areas, for all other deficiencies noted in the REAC inspection, as applicable, verify that corrective actions have been taken. Have the deficiencies been corrected? **Yes  No  N/A**

If no, is there a schedule for correcting the deficiencies within a reasonable timeframe to comply with decent, safe, sanitary and good repair standards?

**Yes**  **No**

Comments:

|  |
| --- |
| 4. Follow-Up & Monitoring of Lead-Based Paint Inspection – The following questions only apply to subsidized family properties or elderly properties housing children under six years of age that were constructed prior to 1978. If constructed after 1977, check N/A for questions a and b. |

a. Is there a certification on file documenting that the project has been certified to be free of lead-based paint or lead hazards?

**Yes  No  N/A**

If there is a certification, obtain a copy for the project file*.*

Comments:

b. Is the owner in compliance with the HUD approved lead hazard control plan as noted on the desk review? **Yes  No  N/A**

Comments:

|  |
| --- |
| C. MAINTENANCE & STANDARD OPERATING PROCEDURES |
| **5. Maintenance** | |

a. Indicate below to confirm that there is a schedule for preventive maintenance/servicing for the items listed that are applicable.

Heating and A/C Equipment WaterHeaters Carpets and Drapes Roof, gutter and Fascia Inspection

Major Appliances Elevators Motor Vehicles Sewer lines Exterior painting Windows

Recreational equipment Landscaping maintenance Other (please specify):

Comments:

b. Is there a satisfactory inventory system to account for tools, equipment, supplies, and keys (serial numbers, bar codes, etc.)?

**Yes  No**

Comments:

c. Has the owner/agent secured inventory items, such as appliances and tools, to prevent theft? **Yes  No**

Comments:

d. Does the owner/agent have a written procedure that explains the process for inspecting units? **Yes  No**

If yes, review a copy*.*

Identify employee responsible for conducting the inspections: Name and Title:

Comments:

e. How often are units inspected?

Monthly  Quarterly  Semi-Annually  Annually  Move-In  Move-Out  Other (please specify):

Comments:

f. How are unit inspections documented?

Please Describe:

g. If deficiencies are noted during a unit inspection, what is the procedure for correction?

Please describe:

h. What is the average number of days from move-out until the unit is ready for occupancy?

Comments:

i. Is there a written procedure for completing work orders? **Yes  No**

If yes, review a copy.

Comments:

j. Is there a procedure in place to handle emergency work orders? **Yes  No**

If yes, describe the procedure:

k. Is there a backlog of work orders? **Yes  No**

If a backlog exists, indicate the current number of work orders:

Number between 1-3 days:     Number between 4-7 days:     Number more than one week:

Comments:

l. Who is provided copies of completed work orders? (check all that apply.)

Tenant  Tenant File  Maintenance Staff  Other (please specify)

Comments:

m. Is there documentation by unit that indicates the date of purchase, manufacturer, model, and serial number for appliance purchases (i.e., ranges, refrigerators, furnaces, air conditioners, hot water heaters, etc.)? **Yes  No**

Comments:

|  |
| --- |
| 6. Vacancy and Turnover |

a. How many units were vacant on the date of the on-site visit?

Number of Vacant Units:     Number Ready for Occupancy:     Average Length of time for unit turnover:

Comments:

b. Walk through at least two vacant units that are ready for occupancy. Assess and document unit readiness.

Comments:

c. Based on the interview with on-site staff, are any of the factors listed below contributing to vacancy problems? (Below, indicate all that apply.)

Security Problems Non-competitive Amenities Inadequate Marketing Project Reputation Poor Maintenance Rents too High

Location  Lack of Demand Tenant/Management Relations Other (please specify)

Bedroom Mix/Size (If yes, indicate which bedroom sizes are hard to rent)

Comments:

d. Based on the responses in questions a, b and c, what actions are being taken by the owner/agent to resolve the issue(s)?

**If not applicable, proceed to question 7.**

Please describe:

|  |
| --- |
| 7. Energy Conservation |

Has management attempted to reduce energy consumption? **Yes  No**

(check all that apply.)

Caulking and weather-stripping  Conversion to individual metering  Storm doors and windows  Consumer education

Water saver devices  Extra insulation  Assessment of Utility Rate Schedule

Other (please specify)        None

Comments:

|  |
| --- |
| ***D. FINANCIAL MANAGEMENT/PROCUREMENT*** |

***(This section applies only to HUD Staff and/or Mortgagees as indicated. CAs may proceed to Section E.)***

|  |
| --- |
| **8. Budget Management** |

a. Does the owner/agent’s staff have access to the current operating budget in order to monitor and control expenses?

**Yes  No  N/A**

Comments:

b. Is an operating budget prepared annually and approved by the owner? **Yes  No  N/A**

If yes, obtain a copy of the current year’s budget.

Comments:

c. Are monthly or quarterly reports prepared by the owner/agent indicating variances between actual income and expenses versus budgeted income and expenses?

**Yes  No  N/A**

Comments:

d. If this is a 202 or 811 project, does the owner/agent maintain a current annual budget? **Yes  No  N/A**

***This question applies only to HUD Staff.***

If yes, is it available on-site? **Yes**  **No**

Comments:

|  |
| --- |
| **9. Cash Controls** |

a. Are collections deposited on the day received or, pending deposit, are they secured and properly controlled? **Yes  No**

Comments:

b. Are adequate controls whenb cash is accepted? **Yes  No  N/A**

Check the controls that are used.

Pre-numbered rent receipts  Bank collections  Safe  Lock box

Comments:

c. Do different persons handle bank deposits and accounts receivable, or is an alternative safeguard used? **Yes  No**

Indicate Names and Titles:

Comments:

d. Are all disbursement checks prenumbered, properly identified with account numbers and supported by vouchers or invoices?

**Yes  No**

Comments:

e. Is the supply of unused checks adequately safeguarded, or under the custody of persons who do not sign checks manually, control the use of facsimile signature plates, or operate the facsimile signature machine? **Yes  No**

Comments:

f. Are funds (receipts, disbursements, petty cash, etc.) periodically checked on a surprise basis by a responsible official, other than site employees?

**Yes  No**

Comments:

g. Are bank statements reconciled promptly upon receipt by someone other than a check signer, and by one who has no cash receipt or disbursement function?

**Yes  No**

Comments:

|  |
| --- |
| **10. Cost Controls** |

a. Are bills, including the mortgage payment, paid in sufficient time to avoid late penalties? **Yes  No**

Comments:

b. Are operating expenses, including taxes and utilities, periodically reviewed to assure that project is paying the lowest possible rate?

**Yes  No**

If yes, provide a recent example.

|  |
| --- |
| **11. Procurement Controls** |

a. What is the procedure used to obtain and award contracts?

Describe procedure:

b. Are bids obtained prior to awarding contracts? **Yes  No  N/A**

Review contracts and determine if bids were obtained and, if the lowest bids were not selected, determine the owner’s/agent’s reasoning for selection.

Comments:

c. Is there a written procedure for checking the quality of work performed by a contractor prior to authorizing payment?

**Yes  No**

Comments:

d. Is there a procedure to assure that the individual authorizing contracted work or services is not the same individual authorizing payment?

**Yes  No**

Comments:

e. Who is the responsible person charged with inspecting the quality of work performed by contractors prior to payment?

Please provide the name and title:

f. Does the project maintain a list on outside contractors? **Yes  No**

Comments:

g. Are vendor bills paid in time to obtain maximum trade discounts? **Yes  No**

Comments:

h. Is there any indication that real or personal property has been subtracted from the mortgaged premises without the permission of the Department?

Comments:

i. Below, check services currently contracted with outside contractors and provide the name of the contractor and annual amount of the contract.

Indicate (by asterisk) whether there is an identify-of-interest relationship between the contractor and the owner/agent.

|  |  |  |
| --- | --- | --- |
| **Service** | **Name of Contractor** | **Annual Contract Amount** |
| Elevator |  | $ |
| Exterminating |  | $ |
| Apartment Cleaning |  | $ |
| Heating and A/C |  | $ |
| Plumbing |  | $ |
| Security |  | $ |
| Trash Collection |  | $ |
| Decorating |  | $ |
| Grounds |  | $ |
| Other |  | $ |

Comments:

|  |
| --- |
| **12. Accounts Receivable/Payable** |

a. Complete the following as of end of last month.

Cash $      Accounts Receivable $      Accounts Payable $

Are tenant accounts receivable within acceptable limits of 10% of one month’s rent potential? **Yes  No**

Amount of receivables above is    % of monthly rent potential.

Of this amount, $    is more than 30 days past due.

Comments:

b. Does the procedure for write-off of bad debts appear reasonable? **Yes  No**

Comments:

c. Has annual “write-off of tenants’ accounts receivable for the last two fiscal years been less than 1% of gross rent potential?

**Yes  No**

Comments:

d. Are accounts payable reasonably current?

**Yes  No**

Indicate amount of accounts payable more than 60 days old:

What are the owner/agent plans to reduce outstanding payables?

Comments:

|  |
| --- |
| **13. Accounting and Bookkeeping** |

a. Are books and records maintained as required by HUD Handbook 4370.2 (Chapter 4) and 24 CFR Part 5?

**Yes  No  N/A**

Check books of accounts thata are maintained. Indicate where books may be examined.

**O** – owner’s office; **A** – agent’s office; **P** – project site

**General Ledger (** **)**  **Rent Receivable Ledger (** **)**  **General Journal (** **)**

**Cash Receipts Journal (** **)**  **Cash Disbursements Journal (** **)**  **Accounts Payable Journal (** **)**

b. Are all required project accounts in the name of theproject in a federally insured institution? **Yes  No**

Comments:

c. Are operating funds, security deposits, reserve funds, and flexible subsidy funds maintained in separate accounts and properly secured for authorized use?

**Yes  No**

Comments:

d. Does the mortgagor make frequent postings (at least monthly) to the ledger accounts? **Yes  No**

Comments:

e. If applicable is owner adhering to HUD-approved repayment Plan? (loan from reserve for replacement, 236 excess income, capital improvement loan, etc.)

**Yes  No**

Comments:

f. Is centralized accounting used for disbursements? **Yes  No**

If yes, are only HUD-insured projects in the pool? **Yes  No**

Comments:

g. If centralized accounting is used, has it been approved by HUD **Yes  No  N/A**

Comments:

h. If centralized accounting is used, is it being administered in accordance with HUD’s approval? **Yes  No  N/A**

Comments:

i. If the trust account is part of a centralized disbursement account, are only HUD-insured projects in that account?

**Yes  No**

If yes, is the project’s balance transferred to the project account at least once monthly? **Yes**  **No**

Comments:

j. If there are automobiles and/or debit or credit cards charged to the project, are the titles kept in the name of the project?

**Yes  No**

If yes, do they have HUD approval? **Yes  No**

Comments:

|  |  |
| --- | --- |
| ***E. LEASING AND OCCUPANCY (This Section does not apply to Mortgagees)*** | |
| **14. Application Processing and Tenant Selection** | |

a. Does the lease application form contain sufficient information to determine applicant eligibility? **Yes  No**

Comments:

b. Does the application ask whether the applicant, or any member of the applicant’s household, is subject to State lifetime sex offender registration?

**Yes  No**

Comments:

c. Does the application ask for a listing of states where the applicant and members of the applicant’s household have resided?

**Yes  No**

Comments:

d. Is form HUD-92006 “Supplement to Application for Federally Assisted Housing”, an attachment to the application or part of the application package?

**Yes  No**

Comments:

e. Is there an arms length procedure between the person who denies an application and the application appeal reviewer?

**Yes  No**

Comments:

f. Has the owner/agent leased a Section 8 unit to a police officer or security personnel who is over the income limits for the project?

**Yes  No**

If yes, has HUD or CA authorized the admission? **Yes  No**

Comments:

g. Does the owner/agent have a written tenant selection plan? **Yes  No**

If yes, does the plan include all required criteria stated in Figure 4-2 of Chapter 4, Handbook 4350.3 REV-1?

**Yes**  **No**  **N/A**

If no, list the required criteria that the tenant selection plan does not include:

Comments:

h. Does the project maintain a waiting list of prospective tenants? **Yes  No  N/A**

If yes, does the list include all required elements stated in Handbook 4350.3 REV-1? **Yes**  **No**

Comments:

i. Enter the number of applicants on the waiting list for each type of unit: 0 BR     1 BR     2 BR     3 BR     4 BR     Other:

Comments:

j. Were the applicants selected from the waiting list in the proper order? **Yes  No**

Comments:

k. Is documentation available to show that the owner/agent has leased not less than 40% of the Section 8 units that become available for occupancy in the previous fiscal year to extremely low-income families? **Yes  No  N/A**

If yes, please review and obtain a copy.

Comments:

l. What marketing steps has the owner/agent taken to attract extremely low-income families?

If not applicable, proceed to question m.

Please describe:

Comments:

m. Does the advertising program comply with the existing affirmative fair housing marketing plan? **Yes  No**

Request to see copies of advertisements.

Comments:

n. Is the affirmative fair housing sign posted in the rental office? **Yes  No**

Comments:

o. Is the fair housing logo included in published advertising materials? **Yes  No**

Comments:

|  |
| --- |
| **15. Leases and Deposits** |

a. Have modifications been made to the HUD model lease? **Yes  No  N/A**

If yes, has the lease and/or lease addenda in use been approved by HUD? **Yes  No  N/A**

This does not include lease addenda issued by HUD

Comments:

b. Aside from rents and security deposits, what other charges are assessed (replacement keys, lockouts, etc.)?

List the type and amount of any of these charges.

Comments:

c If other charges aside from rents and security deposits are assessed, have they been approved by HUD? **Yes  No  N/A**

Comments:

d. Are rents collected in accordance with the provisions of the lease? **Yes  No**

Comments:

e. Is the policy for late fee assessment in compliance with the Handbook 4350.3 REV-1? **Yes  No**

Comments:

f. Are damages caused by tenants properly identified and charged to tenants? **Yes  No**

Comments:

|  |
| --- |
| **16. Eviction/Termination of Assistance Procedures** |

a. Are tenants notified of termination of tenancy or assistance in accordance with HUD requirements? **Yes  No  N/A**

Comments:

b. Are eviction procedures initiated timely, when warranted? **Yes  No  N/A**

Please document the following:

Number of evictions completed during the last 12 months.

Average cost per eviction $

Eviction handled by: Owner/Agent Attorney on staff of Owner/Agent Attorney on contract Attorney on call

**NOTE: Addendum D must be completed if, in accordance with the owner’s recertification policies and procedures, any eviction durng the last 12 months was due to a household member being subject to a state lifetime sex offender registration requirement.**

Comments:

c. Is the termination of assistance initiated timely when warranted? **Yes  No  N/A**

Reason(s) for termination of assistance:

Comments:

|  |
| --- |
| **17. Enterprise Income Verification (EIV) System Access and Security Compliance**  **Applies to subsidized properties only** |

a. Does the owner/agent have access to EIV? **Yes  No**

Comments:

b. Does the EIV Coordinator(s) and/or agent have an owner approval letter(s) authorizing access to EIV?

**Yes  No**

Comments:

c. Does the owner/agent and/or EIV Coordinator have:

* An initial and currently approved EIV Coordinator Access Authorization Form (CAAF) on file for each person designated by the owner as an EIV Coordinator? **Yes  No**
* An initial and currently approved EIV User Access Authorization Form (UAAF) on file for each person designated by the EIV Coordinator as an EIV User? **Yes  No  N/A**
* Signed copies of the EIV Rules of Behavior for Individuals without access to the EIV system, who use EIV reports and/or data to perform their job functions? **Yes  No  N/A**

Comments:

d. Is there evidence that staff with access to the EIV system or to EIV reports take annual security awareness training?

**Yes  No**

If yes, is a record kept of employees who attended the training? **Yes  No  N/A**

Comments:

e. Does the owner/agent have security measures in place to limit access to EIV information and reports to only those persons who have proper authorization?

**Yes  No**

Comments:

f. Does the owner/agent have a procedure to review all EIV User IDs to periodically determine if the users still have a valid need to access EIV data?

**Yes  No**

Comments:

g. Does the owner/agent terminate access promptly (within 30 days) of all users who no longer have a valid need to access EIV data?

**Yes  No**

Comments:

h. Does the owner/agent have a procedure to document and report the occurrence of all improper disclosures of EIV data?

**Yes  No**

If yes, have any improper disclosures been reported to the owner/agent? **Yes  No  N/A**

Comments:

1. Does the owner/agent have a procedure to report any occurrence of unauthorized EIV access or security breach to the HITS National Help Desk?

**Yes  No**

If yes, have any occurrences of unauthorized EIV access or security breaches been reported? **Yes  No  N/A**

Comments:

1. Is there evidence that the owner/agent or any of their employees are sharing IDs and passwords? **Yes  No**

Comments:

1. Is EIV data being improperly shared with other entities (e.g., state officials monitoring LIHTC projects, RHS staff, or Service Coordinators not participating in the recertification process)? **Yes  No**

Comments:

l. Does the owner/agent keep in the tenant file the Tenant Consent for Disclosure of EIV Information, signed by the tenant and a third party when a third party assists in the recertification process? **Yes  No  N/A**

Comments:

|  |
| --- |
| **18. Compliance with Using EIV Data and Reports**  **Applies to subsidized properties only.** |

a. Does the owner/agent have policies and procedures describing the use of EIV employment and income information and the EIV reports?

**Yes  No**

If yes, do they comply with HUD’s usage requirements? **Yes  No  N/A**

Comments:

b. Is the owner/agent using the following EIV reports to resolve and correct discrepant data in TRACS, and/or to reduce improper subsidy payments and, where

applicable, retaining documentation to support the resolution(s)?

Income Disrepancy Report **Yes**  **No**

New Hires Report **Yes**  **No**

No Income Report **Yes**  **No**

Failed EIV Pre-screening Report **Ye**s  **No**

Failed Verification Report (Failed the SSA Identity Test) **Yes**  **No**

Existing Tenant Search **Ye**s  **No**

Multiple Subisidy Report **Yes**  **No**

Deceased Tenant Report **Yes**  **No**

Comments:

|  |
| --- |
| **19. TRACS Monitoring and Compliance (applies to subsidized properties only)** |

a. Is the owner/agent using TRACS queries to review and monitor their transmission? **Yes  No**

Comments:

b. Is the owner/agent following up and correcting deficiencies identified in TRACS data? **Yes  No**

Comments:

|  |
| --- |
| **20. TRACS Security Requirements (applies to subsidized properties only)** |

a. Is the owner’s/agent’s “Rules of Behavior for TRACs” current (within last 12 months) and on file? **Yes  No**

Comments:

b. Is the owner’s/agent’s completed annual TRACS “Security Training Certificate” current, on file and dated within 30 days of the date of the “Rules of Behavior”?

**Yes  No**

Comments:

|  |
| --- |
| **21. Tenant File Security** |

a. Are the tenant files, as well as other files that contain EIV reports, if applicable, locked and secured in a confidential manner?

**Yes  No**

Comments:

b. Is documentation relating to an individual’s domestic violence, dating violence, or stalking, kept in a separate file in a secure location from other tenant files? **Applicable to Section 8 only**. **Yes  No  N/A**

Comments:

c. Is access to tenant file information limited to only authorized staff? **Yes  No**

Comments:

d. Who is authorized to have access to the tenant files? Name(s) and Title(s):

Comments:

e. Is the owner/agent maintaining tenant files according to HUD’s document retention requirements? **Yes  No**

Comments:

f. Is the owner/agent properly disposing of tenant records (shred, burn, pulverize etc.)? **Yes  No**

Comments:

|  |  |  |
| --- | --- | --- |
| **22. Summary of Tenant File Review** | | |
| **This section applies only to subsidized projects and should be completed after the tenant file reviews (See Addendum A.)**  The minimum file sample should include review of tenant files of new move-ins, recertifications (annual, interim, initial), at least one applicant reject file, and at least one terminated/move-out file. In order to review specific functions (EIV usage, utility reimbursement, pet rules/deposits, minimum rents, etc.) it may be necessary to target a portion of the files reviewed to specific tenant families. The reviewer should adjust the tenant file sample to meet the needs of the review. | |
| ***Number of Units*** | ***Minimum File Sample*** |
| 100 or fewer | 5 files plus 1 for each 10 units over 50 |
| 101-600 | 10 files plus 1 for each 50 units or part of 50 over 100 |
| 601-2000 | 20 files plus 1 for each 100 units or part of 100 over 600 |
| Over 2000 | 34 files plus 1 for each 200 units or part of 200 over 2,200 |
| For each question, only answer “Yes” if the files reviewed are acceptable. Answer “No” if the files are not acceptable and note the number of files with deficiencies utilizing the tenant file worksheet, Addendum A | Number of Files Reviewed = |
| **(Please note: There is no maximum number of files to be sampled)** | |

**a. Tenant Files and Records**

i. Are the tenant files organized and properly maintained? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

ii Do the files contain all documentation as required in Handbook 4350.3 REV-1? **Yes  No**

Documents Missing from Files:

Comments:

**b. Application/Tenant Selection**

i. Are the applications in the files signed and dated by applicant? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

ii. Is screening conducted in accordance with the Tenant Selection Plan? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

iii. Are the unit sizes appropriate for household composition at the time of this tenant file review? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

iv. If a household was ineligible at move in, were exceptions granted? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

**c. Lease**

i. Are the correct model leases used? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

ii. Are the leases signed and dated by all required parties? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iii. Are HUD issued lease addenda properly signed and in the file**? Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iv. Are the applicable addenda attached to the lease? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

v. Are security deposits collected in the correct amount for the program? **Yes  No**

**Number of Files with Deficiencies:**

Comments:

vi. Are pet deposits within acceptable range and payment installments allowed? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

vii. Do the tenant files contain acknowldgement(s), signed by the tenant, for receipt of the following documents?

HUD-9887 Fact Sheet **Yes  No  N/A**

**Number of Files with Deficiencies:**

Lead Based Paint Disclosure **Yes  No  N/A**

**Number of Files with Deficiencies:**

Resident Rights and Responsibilities Brochure **Yes  No  N/A**

**Number of Files with Deficiencies:**

*EIV & You* Brochure **Yes  No  N/A**

**Number of Files with Deficiencies:**

Fact Sheet How Your Rent is Determined **Yes  No  N/A**

**Number of Files with Deficiencies:**

Race/Ethnicity Form **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

***d. Certification/Re-Certification Activities:***

i. Are re-certification notices issued in accordance with HUD requirements? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ii. Are certifications completed on time? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iii. Are all necessary verifications completed and properly documented? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iv. Are EIV Income Reports used for third party verification of employment and income? **Yes  No  N/A**

**Number of Files with Deficiencies:**

If the tenant disputed the EIV employment and/or income reported in EIV, was a third party verification obtained from the source?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

v. Are income discrepancies as reported on the EIV Income Discrepancy Report resolved, and the resolution documented?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

vi. Are income and deductions calculated correctly prior to data entry? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

vii. Does income information on the tenant certifications agree with verified file information? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

viii. If tenants were granted a hardship exemption as part of the minimum rent, was the exemption applied correctly?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ix. Are notices provided to tenants in accordance with HUD tenant notification requirements when their portion of rent has increased?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

x. Are the correct contract rents used when determining the subsidy to be paid on behalf of tenants? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

xi. If tenants are paying their own utilities, are the current certifications reflecting the correct utility allowances?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

xii. Are utility reimbursement checks distributed within 5 business days of receipt of the housing assistance payments?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

xiii. Are repayment agreements in accordance with HUD requirements? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

***e. Voucher Billing***

i. Are there any deficiencies noted in the tenant file review that results in over payment or under payment of the subsidy?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ii. For the move-in/move-out tenant file review, does the owner/agent make appropriate voucher adjustments?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

***f. Move-In Files***

i. Are proper income limits used for determining eligibility at move-in? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ii. Do the files contain move-in inspections? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iii. If the files contain move-in inspections, have the owner/agent and the tenant signed and dated the inspection?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iv. Do the move-in files indicate that the owner/agent utilizes the EIV Existing Tenant Search for all household members and applicants?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

***g. Move-Out Files***

i. Do tenants provide written notice of intent to vacate in accordance with the HUD model lease? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ii. Are move-out inspections conducted? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iii. Are security deposits refunded in 30 days or less if required by state law? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iv. Are tenants provided an itemized list of charges against the security deposits? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

v. If charges exceed the security deposit, are the tenants billed for the balance due? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

***h. Application Rejection Files***

i. Are applicants denied admittance in accordance with the Tenant Selection Plan? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

ii. Did rejection letters provide applicants the right to appeal? **Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iii. If applicant appealed an application rejection, was the appeal reviewed by someone other than person who made the original decision to reject?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

iv. Were appeals processed and applicants notified of the appeal decision within 5 days of the meeting?

**Yes  No  N/A**

**Number of Files with Deficiencies:**

Comments:

|  |  |
| --- | --- |
| ***F. TENANT/MANAGEMENT RELATIONS (This Section does not apply to Mortgagees)*** | |
| **23. Tenant Concerns** | |

a. Is there a written procedure for resolving tenant complaints or concerns? **Yes  No**

If yes, review a copy.

Comments:

b. Does the procedure adequately cover appeals? **Yes  No**

Comments:

c. Is there an active tenant organization at this project? **Yes  No**

Comments:

d. Is tenant involvement in project operations encouraged? **Yes  No**

Comments:

|  |
| --- |
| **24. Provision of Tenant Services** |

a. What social services are provided by the project, or the neighborhood, which meet the tenants’ needs? Below, indicate services that are available, and identify the entity providing the service (i.e., city/county/state, church/school, community groups, etc.) and enter the cost to the project, if any.

|  |  |  |
| --- | --- | --- |
| **Service** | **Provider** | **Financial Source** |
| Child Care |  |  |
| Recreation |  |  |
| Health Care |  |  |
| Energy Conservation |  |  |
| Vocational Training/Job Training |  |  |
| Meals |  |  |
| Financial Counseling |  |  |
| Substance Abuse Counseling |  |  |
| Service Coordinator |  |  |
| Neighborhood Networks Center |  |  |
| Other (please specify) |  |  |

b. Is there a Service Coordinator for the project? **Yes  No  N/A**

**If there is no Service Coordinator, proceed to question 24.f.**

Comments:

c. Is the Service Coordinator’s office clearly identifiable and private? **Yes  No**

Comments:

d. Are the Service Coordinator’s files kept secure and confidential? **Yes  No**

Comments:

e. Does the Service Coordinator maintain a directory of service agencies and contacts, and make the information available to all parties?

**Yes  No**

Comments:

f. If there is a Neighborhood Networks Center as indicated on the Desk Review, what is the status of operations?

**If there is no Neighborhood Networks Center, proceed to question 24.h.**

### Open for Business

### Temporarily Closed – State the date the center will reopen:

Permanently Closed – State the date the center closed:

Comments:

g. What programs are offered at the Neighborhood Networks Center?

### GED Adult Basic Education Computer Classes Job Training Job Placement

Homework Assistance  English as a Second Language Other (please specify)

Comments:

h. The Department allows owners and their agents to provide services related to renter’s insurance products. Does the owner/agent offer such services?

**If the owner/agent offers no such service, proceed to question 25. Yes  No**

Comments:

i. HUD policy prohibits an owner/agent from evicting tenants for delinquent renter’s insurance payments.

How does the owner/agent deal with unpaid renter’s insurance?

Please explain the process:

Comments:

j. Review the renter’s insurance information provided to tenants. Does the information provided to tenants clearly indicate that purchasing insurance is optional, and not required as a condition of occupancy? **Yes  No  N/A**

Comments:

|  |  |
| --- | --- |
| ***G. GENERAL MANAGEMENT PRACTICES*** | |
| **25. General Management Operations** | |

a. Have the complaints, as noted on the Desk Review, been satisfactorily resolved? **Yes  No  N/A**

Comments:

b. Is the project staff able to adequately perform management and maintenance functions? **Yes  No**

Comments:

c. How does the owner/agent implement HUD changes in policies and procedures?

Describe the process:

d. Does owner/agent have a formal ongoing training program for its staff? **Yes  No  N/A**

If yes, indicate types of training used and the frequency.

|  |  |
| --- | --- |
| **Type** | **Frequency** |
| On-Site |  |
| HUD Seminars |  |
| Energy Conservation |  |
| Industry/Association Training |  |
| Local Colleges |  |
| Other (please specify) |  |

Comments:

e. Are reports submitted to the owner from the management agent? **Yes  No  N/A**

***This question applies only to HUD Staff and Mortgagees.***

Comments:

f. Are there signs enabling persons to locate the office? **Yes  No**

Comments:

g. Are after hours andemergency telephone numbers posted? **Yes  No**

Comments:

h. List the current insurance coverages (property, liability, Directors and Officers, workman’s compensation, automobile). (Check to make sure that HUD is listed as an additional loss payee, if applicable. Also, check to make sure that the insurance policy is in the name of the mortgagor entity.)

***This question applies only to HUD Staff and Mortgagees.***

|  |  |  |
| --- | --- | --- |
| **Type** | **Basic Coverage** | **Annual Premium** |
| Property |  |  |
| Liability |  |  |
| Other (please specify) |  |  |
| Other (please specify) |  |  |

Comments:

i. Does the owner/agent have a fidelity bond? **Yes  No  N/A**

***This question applies only to HUD Staff and Mortgagees.***

Comments:

|  |
| --- |
| **26. Owner/Agent Participation**  ***This question applies only to HUD Staff and Mortgagees. CAs may proceed to question 24.)*** |

a. If the project is owned by a cooperative or a nonprofit entity, does the Board of Directors meet regularly and record minutes?

**Yes  No  N/A**

Comments:

b. Review copies of the minutes. Does a review of the minutes indicate compliance with HUD’s business agreements?

**Yes  No  N/A**

Comments:

c. Does the owner/agent have a system or procedure for providing field supervision of on-site personnel?

**Yes  No  N/A**

Comments:

|  |
| --- |
| **27. Staffing and Personnel Practices** |

a. Has management made an effort to employ tenants in accordance with Section 3 of the Housing and Community Development Act of 1968?

**Yes  No**

Comments:

b. List all on-site staff charged to the project. (Use additional sheets if necessary).

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Staff Person** | **Date Hired** | **% of Time Charged to Site** | **Annual Salary** | **Unit Size** | **Is the Employee Receiving Subsidy?** | **Is the Employee occupying a**  **Non-Income Producing Unit?** |
|  |  | % |  |  | **Yes  No** | **Yes  No** |
|  |  | % |  |  | **Yes  No** | **Yes  No** |
|  |  | % |  |  | **Yes  No** | **Yes  No** |
|  |  | % |  |  | **Yes  No** | **Yes  No** |
|  |  | % |  |  | **Yes  No** | **Yes  No** |

Comments:

c. Does the staffing chart above match Part D of the Rent Schedule, form HUD-92458 as it relates to non-income producing units?

**HUD staff only. Yes  No**

Comments:

Tenant File Review Worksheet

|  |  |  |
| --- | --- | --- |
| Instructions: Review the appropriate number of tenant files and complete a copy of this worksheet for each file reviewed. Indicate the initial move-in date in the appropriate box. Indicate by marking the appropriate box (Yes, No, or N/A) for each document available in the tenant file. For move-out and applicant rejections files, reviewer should only complete the pertinent sections. | | |
| Name of Reviewer:  Type of Review:  Applicant Rejection  Tenant Move-In  Tenant Move-Out  Certification/Recertification  Effective date of certification(s) reviewed:  If this is a Certification or Recertification, check the certification type:  Certification Type Initial Annual Interim Other | | |
| Family Name: | Unit Number: | Move-in Date: |
| Bedroom Size:  0 Bedroom  1 Bedroom  2 Bedroom  3 Bedroom  4 Bedroom  5 or more Bedrooms | | |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| A. HOUSEHOLD INFORMATION | | | Comments | | |
| 1. Is the application complete, including the date and time received by the owner/agent? | | **Yes  No** |  | | |
| 2. Is there a form HUD-92006, “Supplement to Application for Federally Assisted Housing” in the file?  **This form is optional, to be compled by tenant**. | | **Yes  No** |  | | |
| 3. Are the EIV Existing Tenant Search results in the file along with contacts made as a result of the search?  **Applicable to move-ins after January 31, 2010** | | **Yes  No** |  | | |
| 4. Are the household members identified correctly? (as head, spouse, dependent, co-head, other adult(s), live-in aide, foster child and foster adult) | | **Yes  No** |  | | |
| 5. Is the unit size appropriate for household? | | **Yes  No** |  | | |
| 6. Was this household’s income eligible at move-in?  **This question applies only to a tenant file move-in review.** | | **Yes  No  N/A** | Over income?  Low income?  Very low income?  Extremely low income? | | |
| 7. If household was not income eligible at move-in, was an exception or waiver granted? | | **Yes  No  N/A** |  | | |
| 8. Does the file contain the ethnicity and racial Data Certification as provided to the owner/agent? | | **Yes  No** |  | | |
| 9. Is there current HUD 9887/9887A Consent Form signed by head, spouse, co-head regardless of age, and family members at least 18 years of age? | | **Yes  No** |  | | |
| 10. Is there an acknowledgement in the file that the following documents were provided to the tenant?   * HUD-9887 Fact Sheet * Lead based paint * Resident Rights and Responsibilities Brochure * *EIV & You* Brochure * Fact Sheet on How Your Rent is Determined | | **Yes  No**  **Yes  No  N/A**  **Yes  No**  **Yes  No**  **Yes  No** |  | | |
| 11. Does the tenant file indicate that the owner /agent resolved any EIV reported receipt of multiple subsidies? | | **Yes  No  N/A** |  | | |
| 12. Does the file contain documentation to verify discrepant personal identifiers, and/or subsidy paid, as reported on:  EIV Failed Pre-screening report?  EIV Failed Verification Report (Failed the SSA Identity Test)?  EIV Deceased Tenant Report? | | **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A** |  | | |
| **B. VERIFICATION**  **Have the following items been properly verified and documented?** | | | **Comments** | | |
| 1. Social Security numbers?  EIV Summary Report in file to validate SSNs?  Exemption from SSN disclosure? | | **Yes  No**  **Yes  No  N/A**  **Yes  No  N/A** |  | | |
| 2. Eligible immigration status or citizenship status? | | **Yes  No  N/A** |  | | |
| 3. Criminal and drug screening? | | **Yes  No** |  | | |
| 4. State lifetime sex offender registration check in each state where household members reported they have resided, and/or background checks conducted using a database that checks against all state registries? | | **Yes  No** |  | | |
| 5. Other screening as disclosed in Tenant Selection Plan? | | **Yes  No  N/A** |  | | |
| 6. Verification of:   * Disability status? * Student status? * Ages of occupants? | | **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A** |  | | |
| C. LEASE | | | Comments | |
| 1. Is the correct HUD model lease used? | | **Yes  No** |  | |
| 2. Are HUD issued lease addenda in the file? | | **Yes  No  N/A** |  | |
| 3. Is the original lease and subsequent leases or addenda signed by the owner/agent, head, spouse, co-head, and all other adult members of the household? | | **Yes  No** |  | |
| 4. Are applicable attachments attached to the lease, e.g. house rules, pet rules, unit inspection report? | | **Yes  No** |  | |
| 5. If security deposit is required, is it in the correct amount?  If required, enter the amount here: $ | | **Yes  No  N/A** |  | |
| 6. If pet deposit is required, is it in the correct amount?  If required, enter the amount here: $ | | **Yes  No  N/A** |  | |
| 7. If a pet deposit was paid in installments, was the payment schedule in accordance with the pet regulations? | | **Yes  No  N/A** |  | |
| 8. Are there inspections in the file:  Move-in (dated and signed by tenant and owner/agent)?  Annual unit inspections? | | **Yes  No**  **Yes  No** |  | |
| D. CERTIFICATION/RECERTIFICATION ACTIVITIES | | | Comments | | |
| 1. Are recertification notices provided within the required timeframes? | | **Yes  No** |  | | |
| 2. Are recertifications completed on time? | | **Yes  No** |  | | |
| 3. Is the certification signed and dated by the appropriate parties? | | **Yes  No** |  | | |
| 4. Has a 30-day notice of increase in rent been provided to the tenant? | | **Yes  No  N/A** |  | | |
| **NOTE: If necessary, use additional sheets to complete applicable income information.** | | | | |
|  | | | **Comments** | |
| **All reported income and deductions verified and calculated correctly?** | **3rd Party Verification?** | | **Amount Reported on 50059** | **Did income information on the 50059 agree with verified file information? If no, comment on discrepancies identified** |
| 5. Wages | |  |  | | --- | --- | | EIV Income Report |  | | Traditional 3rd party |  | | Other |  | | Not verified |  | | N/A |  | | | $ |  |
| 6. Social Security benefits | |  |  | | --- | --- | | EIV Income Report |  | | Traditional 3rd party |  | | Other |  | | Not verified |  | | N/A |  | | | $ |  |
| 7. Unemployment benefits | |  |  | | --- | --- | | EIV Income Report |  | | Traditional 3rd party |  | | Other |  | | Not verified |  | | N/A |  | | | $ |  |
| 8. **Other Income**  Welfare/Public Assistance/TANF  Child Support  Pensions  Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A** | | $  $  $  $ |  |
| 9. **Actual Income from Assets**  Checking Account  Savings Account  Certificates of Deposit  40lK/Keogh/Retirement Accounts  Real Estate  Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A** | | $  $  $  $  $  $ |  |
| 10. Imputed income when assets are greater than $5,000 | **Yes  No  N/A** | | $ |  |
| 11. **Allowances/Expenses**  Dependent Allowance  Elderly/Disabled Household Allowance  Medical Expenses  Disability Expenses  Childcare Expenses | **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A**  **Yes  No  N/A** | | $  $  $  $  $ |  |
| 12. Are all expenses and allowances that are claimed eligible under the HUD Handbook 4350.3 REV-1? | **Yes  No  N/A** | |  | |
| 13. Has the household certified whether or not they disposed of assets during the past two years? | **Yes  No  N/A** | |  | |
| 14. Is the correct unit rent being used for subsidy determination? | **Yes  No** | |  | |
| **Enter the reviewer verified amounts for the following:** | **Amount Reported on the 50059** | | **Did income information on the 50059 agree with the verified file information? If not, comment on any discrepancies identified.** | |
| 15. Total Tenant Payment **$**  Tenant Rent **S**  Utility Reimbursement **$**  Assistance Payment  **$** | **$**  **$**  **$**  **$** | |  | |
| 16. Is the tenant paying minimum rent?  If yes, was a hardship exception granted? | **Yes  No  N/A**  **Yes  No  N/A** | |  | |
| 17. Were income discrepancies reported on the EIV Income Discrepancy Report investigated, resolved and file documented? | **Yes  No  N/A** | |  | |
| 18 Has tenant entered into a written repayment agreement for monies due to the project?  If yes, does the plan contain the required information? | **Yes  No  N/A**  **Yes  No  N/A** | |  | |
| 19. Does file reflect owner/agent contact as a result of new employment reported on the EIV New Hires Report”  If yes, is the new employment income included in the reported annual income? | **Yes  No  N/A**  **Yes  No  N/A** | |  | |
| **E. BILLING** | | | **Comments** | |
| 1. Does the assistance payment requested on the monthly billing (HUD-52670-A, Part 1) agree with the assistance payment on the applicable form HUD-50059? | **Yes  No  N/A** | |  | |
| 2. If required, have adjustments been made to the monthly billing? | **Yes  No  N/A** | |  | |
| **F. MOVE-OUT FILE REVIEW ONLY** | | | **Comments** | |
| 1. Is there a move-out notice from tenant?  If yes, Date of Notice  Move-out date | **Yes  No** | |  | |
| 2. Is there a move-out inspection?  If yes, enter the date of the inspection | **Yes  No**  **Yes  No** | |  | |
| 3. Was the security deposit refunded to the tenant within 30 days, or in accordance with state or local laws, whichever is shorter? | **Yes  No  N/A** | |  | |
| 4. Was an itemized list of damages and charges provided to the tenant? | **Yes  No  N/A** | |  | |
| 5. Were any additional charges paid by tenant? | **Yes  No  N/A** | |  | |
| 6. Does the tenant move-out date on the voucher match the date the tenant vacated? | **Yes  No** | |  | |
| **G. APPLICANT REJECTION REVIEW ONLY** | | | **Comments** | |
| 1. Was the reason the applicant was denied admittance in accordance with the Tenant Selection Plan? | **Yes  No** | |  | |
| 2. Did the rejection letter provide the applicant the right to appeal? | **Yes  No** | |  | |
| 3. If the applicant appealed, was the appeal reviewed by someone other than the person who made the original decision? | **Yes  No  N/A** | |  | |
| 4. Was the appeal processed and applicant notified of the appeal decision within five days of the meeting? | **Yes  No  N/A** | |  | |

|  |
| --- |
| Multifamily Housing (Housing) staff or Performance-Based Contract Administrators and Traditional Contract Administrators (CA) must complete this Checklist when conducting on-site management reviews of subsidized and unsubsidized multifamily housing projects. The questions on this checklist cover topics that the Housing staff or CA can be expected to answer and is not intended to cover the full range of civil rights concerns.  **NOTE:** **This document does not require the Reviewer to make a determination of civil rights**  **or Section 504 compliance.** The Checklist is divided into four parts. Part A: Occupancy/Accessible Units/Program Accessibility – This section, along with instructions, must be forwarded to the owner/agent for completion prior to the on-site review. This document must be included with the Documents Reviewer Should Obtain from Owner. See Part D.  Part B: Limited On-Site Monitoring Review – The Reviewer must complete this section during the on-site management review of all projects.  Part C: Section 504 Review – The Reviewer must complete this section during the on-site management review for all federally-assisted projects.  Part D: Documents Reviewer Should Obtain from the Owner/Agent during the on-site management review.  **Please Note that a “No” response to any question does not necessarily mean there is**  **a fair housing or civil rights or a Section 504 violation.** |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Project Name: |  | | |  |
| FHA /Project Number: |  | | |  |
| Section 8/PAC/PRAC Number: |  |  |  |  |
| Owner/General Partner Name: |  |  | Management Agent Name: |  |
| Owner/General Partner Address: |  |  | Management Agent Address: |  |

Type of Development:  Cooperative  Elderly Only  Disabled Only

Elderly/Disabled  Family  Other(Specify)

Total Number of Units:       Total Subsidized Units:

Type of Federal Financial Assistance (check all that apply):

Section 8  Section 202  Section 202/8  Section 202/PAC

Section 202 PRAC  Section 811  Section 221(d)(3)BMIR  Section 236  Other

Number of Units of Each Size: 0 BR       1 BR       2 BR       3 BR       4 BR       5 BR

Other (Specify)

Resident Manager’s Unit: **Yes  No**

Date of First Occupancy:

Service Coordinator Employed By Project? **Yes  No**

|  |
| --- |
| Reviewed by:  Housing  PBCA  CA  Mortgagee  Reviewer:  Date:  Phone:  **This Section is for Multifamily Housing Staff only:**  After a review of the information provided by the owner/agent in Part A, the following as been determined:  The owner/agent is in compliance with Title VI, Subpart D of the Housing and Community Development Act of 1992.  Possible noncompliance with Title VI, Subpart D of the Housing and Community Development Act of 1992. Referred to the local Office of Fair Housing and Equal Opportunity for additional review and appropriate action.  Title VI, Subpart D of the Housing and Community Development Act of 1992 - Not Applicable  Reviewed By:  (Name and Title) |

**PART A**

**OCCUPANCY/ACCESSIBLE UNITS/PROGRAM ACCESSIBILITY**

Authority:

Section 504 of the Rehabilitation Act of 1973 (24CFR Part 8)

Fair Housing Act/Title VIII Regulations (24 CFR Part 100.200)

Uniform Federal Accessibility Standards (UFAS) (24 CFR Part 40)

Regulatory Agreement

For this Part A, the reviewer must forward the form along with the instructions for completion to the owner/agent prior to the on-site review. For subsidized projects, the owner/agent must complete the project information above and the information in Sections I, II, and III below. (See attached instructions.) For unsubsidized projects, the owner/agent must complete the project information above and Sections I and II only. Section III consists of Section 504 compliance, which does not apply to projects that do not receive federal financial assistance. The reviewer will r the completed form from the owner/agent during the on-site review.

**SECTION I – OCCUPANCY**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. This property was designed primarily for:  Exclusively Elderly  Exclusively Disabled  Elderly and Disabled  Family | | 2. Indicate the number of units currently occupied by client groups below  Exclusively Elderly -  Exclusively Disabled -  Elderly/Disabled -  Near-Elderly Disabled -  Family - | | |
| 3. Is there a use agreement or any other document that indicates that this project must serve only elderly tenants?  **Yes  No  Unknown**  If yes, specify type of document:       Effective Date:  **Please attach a copy of the document(s) indicated above.** | | | | |
| 4. If this project is a “covered Section 8 housing project” (see instructions), is there an occupancy preference for the elderly in accordance with **Section 651** of Title VI, Subpart D of the Housing and Community Development Act of 1992? **Yes  No**  **Refer to HUD Handbook 4350.3, REV-1.**  If No, proceed to question 5. | | | | |
| If yes, please enter:  a. the date of the elderly preference:  b. the number of units that must be reserved for occupancy by non-elderly persons with disabilities    , and,  c. the date used to determine the number of units reserved for non-elderly persons with disabilities | | | | |
| 5. Is there an occupancy restriction for the elderly in accordance with **Section 658** of Title VI, Subpart D of the Housing and Community Development Act of 1992? **Yes  No**  **Refer to HUD Handbook 4350.3, REV-1** | | | | |
| 6. Total Number of Units exclusively for the Elderly | 7. Total Number of Units exclusively for Persons with Disabilities | | | 8. Total Number of Units exclusively for Non-Elderly Persons with Disabilities |
| I certify that this information is true and accurate. | | | | |
| **Warning:** HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties.  (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802) | | | | |
| Signature of Owner | | | Date: | |

**SECTION II – ACCESSIBLE UNITS**

Distribution of all wheelchair and other accessible units in the project.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Bedroom Size** | **0** | **1** | **2** | **3** | **4** | **5** | **Other** | **Total** |
| 1. All units |  |  |  |  |  |  |  |  |
| 2. Total units with project-based rental assistance |  |  |  |  |  |  |  |  |
| 3. Mobility accessible units |  |  |  |  |  |  |  |  |
| 4. Vision and/or Hearing  accessibleunits |  |  |  |  |  |  |  |  |
| **\***5. (Total Accessible Units) |  |  |  |  |  |  |  |  |
| 6. Number of persons on waiting list who have requested accessibleunits |  |  |  |  |  |  |  |  |
| 7. Number of accessible units occupied by elderly or family tenants |  |  |  |  |  |  |  |  |
| 8. Number of accessible units occupied by non-elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |
| 9. Number of accessibleunits occupied by elderly tenants with disabilities who require the features of the unit |  |  |  |  |  |  |  |  |
| 10. Percentage of Total Units with Project-Based Rental Assistance  Total line 2 Total line 1 x 100)    % | | | | | | | | |
| 11. Percentage of Total Units that are mobility accessible  Total line 3 Total line 1 x 100)    % | | | | | | | | |
| 12. Percentage of Total Units that are vision and/or hearing accessible  Total line 4 Total line 1 x 100)    % | | | | | | | | |

**\*If a unit is both mobility accessible and vision or hearing accessible, count the unit only once in line 5.**

|  |  |
| --- | --- |
| I certify that this information is true and accurate. | |
| **Warning:** HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties.  (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802) | |
| Signature of Owner | Date: |

**SECTION III – PROGRAM ACCESSIBILITY**

Section 504 of the Rehabilitation Act of 1973

Section 504 Coordinator [24 CFR 8.53 (a)]

1. Does the recipient (as defined in 24 CFR 8.3) employ at least 15 employees? **Yes  No**

If Yes, answer Question 2.; if No skip to Question 3.

2. Is at least one person designated to coordinate its Section 504 responsibilities? **Yes  No  N/A**

If Yes,provide the person’s name and telephone number below.

Name:

Telephone Number:

Program Accessibility Under Section 504, a federally assisted Housing Development is required to ensure that its program is usable by and accessible to persons with disabilities. This includes, but is not limited to, maintaining housing and non-housing facilities that are structurally accessible for persons with disabilities. The extent to which facilities must be structurally accessible depends in part, on whether they are new, altered, or existing. In addition, owner/agents are required to ensure that appropriate and effective communication methods are used while communicating with persons with disabilities.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **YES** | NO | | COMMENTS |
| 3. Has the owner/agent taken steps to ensure effective communication using: |  |  | |  |
| a. Qualified sign language and oral interpreters? |  |  | |  |
| b. Readers? |  |  | |  |
| c. Use of tapes? |  |  | |  |
| d. Braille materials? |  |  | |  |
| Other (Describe): |  |  | |  |
| I certify that this information is true and accurate. | | | | |
| **Warning:** HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties.  (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802) | | | | |
| Signature of Owner | | | Date: | |

**Instructions for completing part a**

**General instructions:** Complete the project name, FHA/project number, and section 8/pac/prac information in the form header for each page:

***section i - Owner/Agent must respond to all questions in this section.***

1. Check the appropriate box that the project was designed to serve. **(Check only one box. Do not leave blank.)**

**Exclusively Elderly** - defined as a person 62 years of age or older. (This option is for projects that were designed to serve only elderly persons/families, i.e. Section 202 PRAC properties)

**Exclusively Disabled** – Refer to HUD Handbook 4350.3, REV-1, Figure 3-6 for the applicable definition of disability. (This option is for projects that were designed to serve only persons with disabilities, i.e., Section 202/8 Projects for the Disabled and Section 811 projects. Please note that Section 202/8 Projects for the Disabled were developed to serve only non-elderly persons with disabilities. However, the Section 811 Projects were developed to serve persons with disabilities regardless of age as long as the minimum age requirement (age 18) is met.)

**Elderly and Disabled** – defined as a property that serves the elderly and non-elderly persons with disabilities. (This option is for projects that were originally designed to serve only elderly persons/families, however the owner may have elected a preference under Section 651 of Title VI, Subpart D of the Housing and Community Development Act of 1992 ( Title VI Subpart D) to reserve a percentage of units for non-elderly persons with disabilities in accordance with the provisions of Section 652, Title VI Subpart D. See instruction 4 below for Section 651 definition.)

**Family** – defined as all persons regardless of age or disability. (This option is for projects that serve all families with no restrictions or preferences as long as the minimum age requirement is met. Please note that family projects may have some units that are reserved for persons with mobility/vision/hearing impairments which would require the applicant to meet the accessibility features of the unit.)

2. Enter the number of units occupied by each client group. (Please note that the term “near-elderly disabled” is defined as a person who is at least 50 years of age and below the age of 62 with a disability as defined in HUD Handbook 4350.3, REV-1.)

**Enter zero “0” if there are no units occupied by the listed client group – do not leave blank.**

3. If there is a use agreement or other document requiring that the property must serve only elderly persons, answer “Yes”, in the space provided, and attach a copy of the document(s). If there is no use agreement or other document requiring that the property must serve only elderly persons, answer “No”. If you are unclear on the term “use agreement”, or are not able to locate the use agreement or other document that defines the occupancy of your project, the answer is “unknown”. Other documents include the regulatory agreement, loan commitment papers, financial documents, bid invitation, owner’s management plan, application for funding, and/or application for mortgage insurance. Please refer to HUD Handbook 4350.3, REV-1, paragraphs 3-17 and 3-18. If you do not have a copy of HUD Handbook 4350.3, REV-1, copies can be obtained from [www.hudclips.org](http://www.hudclips.org) or the HUD Customer Service Center at (800) 767-7468.

4. Section 651 of Title VI Subpart D permits an owner to give preference[[1]](#footnote-1) to elderly families if (1) the project was originally developed to serve the elderly and (2) it is a “covered Section 8 housing project.” “Covered Section 8 housing projects” are projects that were constructed or substantially rehabilitated pursuant to assistance provided under section 8(b)(2) of the United States Housing Act of 1937, as in effect before October 1, 1983, that are assisted under a contract for assistance under such section.

Section 651 of Title VI Subpart D applies to the following programs:

* The Section 8 New Construction Program, 24 CFR part 880
* The Section 8 Substantial Rehabilitation Program, 24 CFR part 881
* The State Housing Agencies Program, insofar as it involves new construction and substantial rehabilitation, 24 CFR part 883
* The New Construction Set-Aside for Section 515 Rural Rental Housing Projects Program, 24 CFR part 884
* The Section 8 Housing Assistance Program for the Disposition of HUD-Owned Projects, insofar as it involves substantial rehabilitation, 24 CFR part 886 subpart C

“Covered Section 8 housing projects” do not include those developed with funding under the following programs:

Section 202;

Section 202/8;

Section 202 or 811 PRAC;

Section 221 (d)(3); and/or

Section 236.

If an owner elects a Section 651 preference for the elderly, the owner must reserve a number of units for non-elderly persons/families with disabilities. Title VI Subpart D requires that the owner review the occupancy records on January 1, 1992 and October 28, 1992, the date of enactment for Title VI Subpart D, and determine the number of non-elderly persons with disabilities that occupied units on those two dates. Compare the higher of the two numbers with 10 percent of total project units. The lower of the two resulting numbers must be reserved for non-elderly persons with disabilities, or families with disabilities.

For example, an owner has a covered Section 8 project that consists of 100 units, and decides to implement an elderly preference under Section 651. The first thing the owner must do is find the occupancy records for January 1992 and see how many units were occupied by non-elderly personswith disabilities, or families with disabilities, on January 1. In this example, it was 10 units.

Then the owner must find the occupancy records for October 1992 and see how many units were occupied by non-elderly persons/families with disabilities on October 28th, the date of the enactment of the Act. In this example it was 15 units.

To obtain the number of units that must be reserved for non-elderly disabled persons or families, the owner must take the higher number of the two dates, which in this example is 15.

Then the owner will then compare that number 15 with a number that is 10 percent of the total project units In this example it’s 10. Use the lower number for the number of units that must be reserved. Since 10 is less than 15, for this example the owner must reserve 10 units for non-elderly disabled persons or families.

If an owner determines that there were no non-elderly persons or families occupying units on either January 1, 1992 or October 28, 1992, the required number of units to be reserved for non-elderly persons with disabilities would be zero (0). However, owners are encouraged to exceed the number of reserved units for non-elderly persons with disabilities if a need exists in the community.

Answer question 4 as follows:

If there is an elderly preference in accordance with Section 651 of Title VI Subpart D, answer “Yes”. If there is no preference provided to elderly families, answer “No”.

If yes, answer the following:

1. If there is an occupancy preference in accordance with Section 651, indicate the effective date of the preference.
2. If there is an occupancy preference in accordance with Section 651, indicate the total number of units that must be reserved for non-elderly persons with disabilities based on the two dates above.
3. If there is an occupancy preference in accordance with Section 651, indicate which date (see above) was used to determine the number of units that must be reserved for non-elderly persons with disabilities.

5. Section 658 of Title VI, Subpart D of the Housing and Community Development Act of 1992 ( Title VI Subpart D) permits owners of “other federally assisted housing” to continue to restrict occupancy to elderly families in accordance with the rules, standards, and agreements governing occupancy in such housing in effect at the time the housing was developed. If (A) the project was originally developed to serve the elderly and (B) the project has continually served elderly tenants. These projects include:

Section 202 Direct Loans (prior to the Section 202 PRAC program)

Section 221(d)(3) BMIR properties (New Construction and Substantial Rehabilitation)

Section 236 properties

Answer question 5 as follows:

If there is an elderly restriction in accordance with Section 658 of Title VI Subpart D, answer “Yes”. If there is no elderly restriction and occupancy is not limited to elderly applicants, answer “No”.

6. If the property designates a number of units that can be occupied onlyby elderly persons, indicate the number of units. If the property does not have units that can only be occupied by elderly persons, enter zero “0”.

7. If the property designates a number of units that can be occupied onlyby persons with disabilities, indicate the number of units. If the property does not have units that can only be occupied by persons with disabilities, enter zero “0”.

8. If the property has units that must be occupied by non-elderly persons with disabilities, indicate the number of units. If the property does not have units that must be occupied by non-elderly persons with disabilities, enter zero “0”.

**CERTIFICATION:**

Self-Explanatory **Must be signed and dated by the owner.**

SECTION II – Owner/Agent must respond to all questions in this section.

1. Enter the total number of units (by bedroom size) and enter total in the ”Total” column.

**Totals must match numbers entered for each bedroom size.**

2. Enter the total number of units (by bedroom size) that are receiving project based rental assistance.

**Totals must match numbers entered for each bedroom size.**

3. Enter the number of mobility accessible units by bedroom size, and enter the total in the “Total” column. A mobility accessible unit is one that is located on an accessible route, and when designed, constructed, altered, or adapted, can be approached, entered, and used by individuals with physical disabilities, including those who use wheelchairs. Although accessibility features include items such as grab bars, flashing fire alarms, widened doorways, entrance ramps, etc, this question should be answered by stating the number of subsidized units that, when constructed, are fully accessible in accordance with the Uniform Federal Accessibility Standards (UFAS) which is used to ensure compliance with Section 504 of the Rehabilitation Act of 1973. These standards were jointly developed by the General Services Administration, the Department of Housing and Urban Development, the Department of Defense, and the United States Postal Service, under the authority of sections 2, 3, 4, and 4a, respectively, of the Architectural Barriers Act of 1968, as amended, Pub. L. No.90-480, 42 U.S.C. 4151-4157. Copies of the UFAS are available from the Architectural and Transportation Barriers Compliance Board , 1331 F Street, NW, Suite 1000, Washington, D.C. 20004-1111, Telephone: (202) 272-0080, email address: [info@access-board.gov](mailto:info@access-board.gov). If the property is accessible in accordance with Minimum Property Standards (MPS), indicate the number of units that are MPS accessible. Unsubsidized units should also be counted if they meet UFAS compliance requirements.

**Totals must match numbers entered for each bedroom size.**

4. Enter the number of units, by bedroom size, that are accessible for vision or hearing impairments and enter total in the “Total” column. Refer to UFAS. See instruction number 3 above.

**Totals must match numbers entered for each bedroom size.**

5. Total the units from rows 3 and 4 for each bedroom size, and enter the total in the “Total” column.

**Totals must match numbers entered for each bedroom size.**

6. Enter the number of persons currently on the waiting list for an accessible unit, by bedroom size, requiring the features of the unit and enter total in the “Total” column.

**Total must match numbers entered for each bedroom size.**

7. Enter the number of accessible units, by bedroom size, that are currently occupied by elderly or family tenants and enter total in the Total column.

**Total must match numbers entered for each bedroom size.**

8. Enter the number of accessible units. by bedroom size, occupied by non-elderly tenants with disabilities requiring the features of the unit and enter total in the “Total” column. These tenants must have a mobility impairment as defined above.

**Total must match numbers entered for each bedroom size.**

9. Enter the number of accessible units, by bedroom size, occupied by elderly tenants with disabilities requiring the features of the unit and enter total in the “Total” column. These tenants must have a mobility impairment as defined above.

**Total must match numbers entered for each bedroom size.**

10. Self-explanatory

11. Self-explanatory

12. Self-explanatory

**CERTIFICATION:**

Self-Explanatory

**Must be signed and dated by the owner.**

SECTION III – Owner/Agent must respond to all questions in this section.

This Section is not applicable to unsubsidized projects.

1. The Section 504 Coordinator is required if the owner employs 15 or more people in all its activities. This includes this project combined with other projects they may own and/or manage. Answer Yes or No. If Yes, proceed to question 2; if No, skip to question 3.
2. Answer Yes or No to this question. If Yes, please provide the name and telephone number of the coordinator for Section 504 related activities at the project, and go to question 3.
3. Answer Yes or No to each item and provide comments as necessary.

**CERTIFICATION:**

Self-Explanatory

**Must be signed and dated by the owner.**

**PART B**

**On-Site Limited Monitoring Review**

### Authority: 24 CFR 5, 108, 110

Questions 1 through 4 apply to owners of subsidized **and** unsubsidized projects.

|  |  |  |  |
| --- | --- | --- | --- |
|  | YES | NO | COMMENTS |
| 1. Was this project built or substantially rehabilitated after February 1972?  (If NO, skip to Question 5.) |  |  |  |
| 2. Does the owner have an approved Affirmative Fair Housing Marketing Plan (AFHMP)? |  |  |  |
| 3. If there is an approved AFHMP as indicated  in question 2, is it available on site? |  |  |  |
| 4. Has the owner/agent reviewed the AFHMP within the last 5 years to ensure that the information is current and applicable? |  |  |  |
| 5. Date of last AFHMP Update |  |  | Date: |
| 6. Does the project maintain Project Profile Data which shows the composition of the occupants by the following categories  (24 CFR 121): |  |  |  |
| 1. Race |  |  |  |
| 1. National Origin/Ethnicity |  |  |  |
| 1. Sex |  |  |  |
| 1. Disability |  |  |  |
| 1. Familial Status |  |  |  |
| 7. Has the owner/agent developed and implemented a written Tenant Selection? |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
|  | **YES** | **NO** | **COMMENTS** |
| 8. Does the management agent maintain a  waiting list of applicants by: |  |  |  |
| (a) Name |  |  |  |
| (b) Bedroom size |  |  |  |
| (c) Application date and time? |  |  |  |
| (d) Requests for accommodations and/or  accessible units? |  |  |  |
| (e) Preferences? |  |  |  |
| 9. When a tenant/applicant notifies the owner/agent that he/she has been subject to unlawful discrimination, does the owner/agent provide the applicant/tenant with information about how to file a complaint with HUD? |  |  | Unable to Observe |
| 10. Does the owner/agent maintain a record of fair housing complaints? |  |  |  |
| 11. Is there a local residency preference? |  |  |  |
| If yes, was it approved by HUD? |  |  | Date of HUD Approval: |

**Part C**

Section 504 Review

The Reviewer must complete this section to ensure compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504). **Please note that unsubsidized projects are not required to comply with Section 504, therefore if the project is unsubsidized, the Reviewer may proceed to Part D.**

|  |  |  |  |
| --- | --- | --- | --- |
|  | YES | **NO** | **COMMENTS** |
| 1. Is there a formal, written grievance procedure that provides for resolution of complaints alleging discrimination based on disability, as required by Section 8.53(b)? |  |  |  |
| If Yes**,** document date procedures were  adopted: |  |  | Date: |
| 2. Does the owner/agent utilize a telecommunications device for the hearing impaired (TTY)? |  |  |  |
| If No**,** Is there an alternative method?  Describe under “Comments” |  |  |  |
| 3. When necessary, are auxiliary aides used to communicate with persons with disabilities?  Describe under “Comments” |  |  |  |

## PART D

**DOCUMENTS REVIEWER SHOULD OBTAIN FROM OWNER/AGENT**

The Reviewer will only bring back documents upon request from FHEO. If the Reviewer receives a request from FHEO to obtain certain documents, indicate in column a. During the on-site review, request the documents and indicate the status in columns b, c, or d. For items checked in column c, the Reviewer must provide the owner/agent the FHEO address for forwarding the documents.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Document(s) | a. FHEO has requested that the Reviewer obtain the following documents: | | b. The document has been gathered and is attached to the Checklist | c. The Owner/  Agent agrees to forward the checked document to FHEO within ten (10) business days. | d. The document is not available. | |
| For Part A | | | | | | |
| 1. Accessible Units/Program Accessibility, Sections I, II, and III (as applicable) |  | |  |  |  | |
| **For Part B:** | | | | | | |
| 1. Most recent Affirmative Fair Housing Marketing Plan (AFHMP) | |  |  |  |  | |
| 1. Any of the following documents that are used for outreach as specifically stated in the project’s AFHMP or used for other affirmative fair housing marketing. | |  |  |  |  | |
| Newspapers/Publications | |  |  |  |  | |
| Copy of Radio Ads and Announcements | |  |  |  |  | |
| Copy of TV Ads and Announcements | |  |  |  |  | |
| Photograph of billboards | |  |  |  |  | |
| Letterhead | |  |  |  |  | |
| Handouts | |  |  |  |  | |
| Brochures and Leaflets | |  |  |  |  | |
| Photograph and site signs | |  |  |  |  | |
| Other (Specify): | |  |  |  |  | |
| 1. Project Profile showing occupancy data (See Part B, Question 5). | |  |  |  |  |
| 1. Written Tenant Selection Plan | |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Please Note:** The information below only pertains to Section 504 compliance.  **If this project is unsubsidized, the Reviewer should not complete this section.** | a. FHEO has requested that the Reviewer obtain the following documents: | b. The document has been gathered and is attached to the Checklist. | c. The Owner/  Agent agrees to forward the checked document to FHEO within ten (10) business days. | The document is not available. |
| **For Part C:** | | | | | |
| 1. Written Grievance Procedure (Part C, Question 3 and 24 CFR 8.53) |  |  |  |  |
| 1. Application for Occupancy |  |  |  |  |
| 1. Reasonable Accommodation Policy |  |  |  |  |

FHEO requested that the reviewer observe the following:

The result of the observation is:

**Instructions:** Reviewers should place a check mark next to those items that must be available for review.

**General Documents**

All Tenant Files and records, including rejected, transfer and move-out files

Current waiting list

`  Last advertisement and/or copies of apartment brochures

HUD-approved Rent Schedule form HUD-92458

Procurement Files

Work Order Journals and Logs

Cash Disbursement Journal

Fidelity Bond

Property and Liability Insurance

Copies of the form HUD-52670 for the last twelve months, for each subsidy contract

Current annual budget

Quarterly budget variance reports

Reserve for Replacement component analysis

Copy of Rent Roll

Copy of Application form

Copy of lease, lease addenda and house rules

Copy of Pet Policy

Copy of Applicant Rejection Letter

Annual Unit Inspections

Fact Sheet “How Your Rent Is Determined”

Copy of the “Resident Rights & Responsibility”

Lead Based Paint Certifications

EH& S Certifications

All Operating Procedure Manuals

Documentation for Elderly Preferences Under Sections 651 or 658

Income Targeting and Tracking Log

List of all current Principals and Board Members

EIV Coordinator Access Authorization form(s) (CAAFs) – approved initial and current

EIV User Access Authorization form(s) (UAAFs) – approved initial and current

EIV Owner Approval Letter(s)

Rules of Behavior for individuals without access to the EIV system

Copy of TRACS Rules of Behavior, signed and dated

Copy of TRACs requested Security Awareness Training Certificate, signed and dated

Other

**Civil Rights Front End Limited Monitoring and Section 504 Review Documents**

Affirmative Fair Housing Marketing Plan

Tenant Selection Plan

Recent advertising

Fair Housing logo and Fair Housing poster

|  |  |  |
| --- | --- | --- |
| Project Name: |  |  |
| FHA /Project Number: |  |  |
| Section 8/PAC/PRAC Number: |  |  |

**Instructions: Reviewers should record the below statistics on households that include a household member who is subject to a state lifetime sex offender registration requirement.**

1. Number of households where, in accordance with the owner’s policies and procedures, a household member subject to a state lifetime sex offender registration requirement was identified at recertification.

Of the households identified at recertification:

a. How many were admitted prior to June 25, 2001, the effective date of the Screening and Eviction for Drug Abuse and Other Criminal Activitiy final rule, and who had a household member subject to a state lifetime sex offender registration requirement at the time of admission?

NOTE: These households must not be evicted unless they commit criminal activity while living in the federally assisted housing, or have other lease violations.

b. How many were erroneously admitted?

c. How many households include a member that became subject to a state lifetime sex offender requirement after admission?

2. Number of evictions due to the erroneous admission of a household with a member subject to a state lifetime sex offender registration requirement?

Number of such evictions upheld in court.

3. Number of evictions due to a household member becoming subject to a state lifetime sex offender registration requirement after admission.

Number of such evictions upheld in court.

1. A “preference” allows an owner to give priority to elderly persons when selecting tenants for occupancy. [↑](#footnote-ref-1)