

CHAPTER 3: STAFF ROLES AND RESPONSIBILITIES

3-1. HEADQUARTERS STAFF

- A. The Assistant Secretary for Housing is responsible for developing Annual Fund Assignment Distribution Plans (Section 8 Assignment Plan and the Fund Assignment Plan for the Section 202 Direct Loan Program), outlining the allocation of available budget and loan authority for the Department's assisted housing programs; determining the amount and composition of the Headquarters Reserve; and identifying the amount of budget authority to be set-aside for specific programs. The Assistant Secretary is also responsible for reallocating budget authority among Regions; developing policies to govern the fund allocation procedures, including those periods in which the Department operates under a continuing resolution and, ensuring that appropriate funding authority is available for the preparation and/or review of assignment documents to ensure consistency in processing.
- B. The Administrative Expenses Division, Office of Budget, is responsible for monitoring the development of the Department's budget; providing information concerning the status of allotments and assignments for all Housing programs; assigning program allotments and providing appropriate guidance, following the receipt of the Apportionment; and reviewing all assignments of contract, budget and loan authority to ensure that they are within the policy limits established by Congress, the Office of Management and Budget (OMB) and the Department.
- C. The Funding Control Division, Office of Housing Budget and Field Resources, is Housing's central control point for the coordination and execution of all fund-related issues. The Division is responsible for the analysis, assignment and monitoring of the assisted housing funds appropriated by Congress and apportioned by the OMB each fiscal year. Consistent with Departmental program objectives and statutory requirements, the Division is also responsible for preparation of the annual Fund Assignment Plan, outlining the allocation of available budget and loan authority; coordinating with the Office of General Counsel, Administration and various housing program staff in formulating funding policy materials to provide guidance to the field on statutory and administrative directives on the use of funds; monitoring fund controls in the Regional and Field Offices; preparing fund assignments (forms HUD-185) of assisted housing funds for each Regional Office, including funds for processing and advertising expenses; reporting on the status of funds throughout the year; surveying field offices on projected needs; and maintaining

historical data on prior year funding actions. In addition, the Funding Control Division is responsible for providing adequate training to Regional Office personnel on Housing fund assignment procedures and required controls.

D. The Budget Division, Office of Housing Budget and Field Resources is responsible for determining appropriate budgetary needs for Housing programs and staff and to ensure availability of funding to effectively meet Housing and Departmental priorities. The Budget Division is also responsible for providing timely and pertinent information to the Assistant Secretary for Housing and other HUD officials regarding budgetary matters. The Budget Division acts as a resource for the Assistant Secretary and other HUD staff regarding budgetary matters and implements the Administrative budget through the development of the following budget submissions. The Division also provides supporting data, Press Books and Congressional Justifications. The Division implements enacted appropriations by ensuring that funds are available for allocation to the field and assists with and reviews assignment plans, notices, and proposed rules, which have a budgetary impact, and monitors the progress of funding throughout the fiscal year.

E. The Office of Finance and Accounting has the responsibility of verifying that funds are available prior to the assignment of funds to the Regional Offices and prior to commitment of funds by the Department, confirming the obligation when made and accounting for the disbursements of the funds as they are processed. The following divisions within OFA are responsible for the validation of the assignments of funds (forms HUD-185) to the Regional Offices:

1. The Subsidized Housing Programs Division is responsible for validating all Section 8 forms HUD-185.
2. The General Programs Accounting Division is responsible for validating all Section 202, Flexible Subsidy, and Housing Counseling forms HUD-185.
3. The Financial Control and Accounting Division is responsible for validating all Single Family and Multifamily Processing Fee and Advertising Expense Forms HUD-185.

The Office of Finance and Accounting is also responsible for maintaining fund control and accounting records of all budgetary and financial transactions (including obligations and disbursements); processing disbursements of funds; and providing reports on fund control and financial transactions to the Office of Housing.

- F. The Economic and Market Analysis Division (EMAD), under the Assistant Secretary for Policy Development and Research, is responsible for determining "housing needs factors" for each county and central city in each Field Office jurisdiction and adjusting such factors to reflect the relative costs of providing housing among Field Office jurisdictions. This information is used by the Funding Control Division in allocating funds to the Field Offices in accordance with the fair share requirements.

3-2. REGIONAL OFFICE STAFF

- A. The Regional Administrator is responsible for the preparation of a standard Regional organizational Control Plan containing procedural guidelines for Regional and Field Office fund subassignment controls (in accordance with Handbook 1830.4, REV 2, Procedures for Processing Fund Assignments). This responsibility includes distribution of the Plan to the Funding Control Division in Headquarters and appropriate Divisions in the Regional and Field Offices. The Regional Administrator is also responsible for reviewing all subassignments of housing assistance funds within the Region; providing the administrative support for Field Office program reservations; and making any necessary intra-Regional shifts of authority. Additionally, the Regional Administrator has responsibility for designating a central point of coordination and contact for staff responsible for the fund assignment process. The central point of contact will provide oversight within the Region and give Headquarters a contact point for the processing and budgetary financial management aspects of Regional fund assignments.

Further, where the Regional Office performs Field Office functions in its co-location capacity or Regional Office jurisdictions are established as allocation areas for particular housing programs, the Regional Administrator is responsible for allocating housing assistance and reviewing applications for housing assistance.

- B. Program/Field Support Staff, under the Regional Housing Director/Regional Public Housing Director, are responsible for reviewing the initial forms HUD-185 assigned by Headquarters; preparing subsequent subassignments (forms HUD-185.1) transmitting the forms HUD-185.1 to the appropriate Field Offices; providing guidance to Field Offices; and monitoring and evaluating Field Office administration of the fund control process. Responsibilities also include developing and maintaining a control log to track fund assignments and subassignments (this control system should be automated). The Regional Housing Directors and or the Regional Public Housing Directors Program/Field Support Staff performs regular Field Office Performance Reviews, including procedures to verify that Field Office fund control logs are being used and that the control logs are functioning appropriately. This

staff is also responsible for providing adequate training to Field Office personnel on the fund assignment procedures and required controls. The Field Support Staff is responsible for establishing on-going procedures for tracking, monitoring and reconciling Single and Multifamily FHA Processing Funds and Single Family Property Disposition Advertising expense funds. In addition, the Program/Field Support Staff is responsible for establishing procedures for reconciling the Field Office fee usage data reports with Field Office tracking logs for each funding category as part of the Regional Office review of its Field Offices.

- C. The Regional Accounting Division (RAD) Director is responsible for recording and accounting for assisted housing fund subassignments to Field Offices, for the verification of fund availability for subassignments, and for the reservation of authority against assignments and subassignments. The RAD is responsible for ensuring that funds for projects are reserved within 24 hours from the date the reservation documents are received from the Field Office. The RAD is also responsible for ensuring that fund assignments are reconciled with HUD accounting systems on a regular basis.

3-3. FIELD OFFICE STAFF

- A. The Field Office Manager/Supervisor is responsible for the execution of the allocation process and monitoring and controlling the use of housing assistance funds for each housing program to ensure that Departmental program production objectives and priorities are met, and that the localities' housing goals by housing and household types are achieved to the maximum extent practicable. The Field Office Manager/Supervisor is also responsible for designating a point(s) of coordination and contact for all forms HUD-185.1 to ensure receipt and proper distribution to the appropriate staff person(s); identifying eligible (Public Housing Agencies) PHAs by allocation area; approving the allocation plan; and allocating housing assistance funds.
- B. The Directors of the Housing Development/Housing Management Divisions are responsible for preparing the reservation documents (Notification Letters, Project Accounting Data form HUD-52540(PAD)) and reserving funds in accordance with Chapter 7 of this Handbook, based on the subassignments (forms HUD 185.1) received from the Region; developing a central coordination and contact point responsible for tracking fund subassignments, reviewing PADs for accuracy; tracking corresponding fund reservations and unreserved balances established at Field Offices; and performing on-going reconciliations of assignments with HUD accounting systems. The Management Information System (MIS)/Assisted Housing Accounting System (AHAS)/Program Accounting System (PAS) Interface reports are used to verify entry of reservation data

submitted to the RAD. It is imperative that these reports are available on a daily basis for use by the appropriate funds control staff. In addition, the Housing Development/Housing Management Divisions are responsible for performing monthly Field Office reconciliations of funds assigned for Processing and Advertising Expenses with cumulative fee expense and inspection usage.

- C. The Regional/Field Office Economists are responsible for determining the smallest practicable areas, consistent with the delivery of assistance through a meaningful competitive process designed to serve the greatest needs in order to meet the "Fair Share" requirements in Section 213(d) of the HCD Act of 1974. The formulation of these areas is to include input from Housing, Public Housing, CPD and the FHEO Divisions. The overall allocation plan showing the allocation areas is recommended to the Regional Administrator/Field Office Manager for review and approval.