Summary Requirements for HUD Monitoring

PART A: MANAGEMENT/ORGANIZATION CHECKLIST

Subpart A-1: Staffing Review

1. Employment of Program Director and Program Administrator
2. Organization sufficiently staffed to accomplish goals
3. Individual production goals for staff
4. Written job descriptions
5. Staff responsibilities clearly defined (*e.g.*, staff understand their job duties, responsibilities and authority)

Subpart A-2: Organizational Relationships

1. Involvement of all agencies and organizations called for in work plan in ways called for in work plan
2. Involvement of faith-based and community organizations as called for in work plan
3. Written agreements with partners
4. Effective organizational relationships (*e.g.*, mutual cooperation and communication with few or no disconnects)
5. Effective Board of Directors if applicable

Subpart A-3: Sub-Recipient and Sub-Grantee Monitoring

1. Receipt of accurate reports from the sub-recipient/sub-grantee on unit production, including inspections, risk assessments, lead hazard work, and units clearance
2. At least monthly progress reports on efforts being taken by sub-recipients/sub-grantees to address obstacles to performance
3. Reports detailing sub-recipient/sub-grantee efforts to enhance coordination and integration of Lead Hazard Control work with other organizations and programs
4. Receipt of regular financial reports and/or invoices for services provided and work performed
5. Individual production goals for sub-recipients/sub-grantees
6. Grantee verification of accuracy and eligibility of invoices prior to payment
7. Financial reports and/or regular invoices for services provided and work performed
8. Grantee *quality control* (*e.g.*, periodically conducting on-site visits) to determine whether all aspects of the program are being performed according to program requirements
9. Monitoring of sub-grantee for changes in key personnel, training and certifications obtained or being sought, changes in the work plan or budget, progress in education and outreach activities, compliance with eligibility requirements, compliance with work standards for lead hazard remediation, safe work practices, and family relocation

PART B: DATA BASE, FILES AND TRACKING SYSTEM

Whether a grantee or responsible sub-recipient is maintaining an accurate database, as well as complete and accurate files, is an indication of how well the program is being administered and if reports to HUD can be relied on for accuracy. A tracking system, although not required to meet program goals, is a recommended tool to assist the grantee to stay on schedule in the accomplishment of work plan benchmarks.

<u>Subpart B-1: Completeness of Database and Files</u>

1. Maintenance of complete and accurate database
2. Potential items to include in database:
    - No. of units completed and cleared
    - No. of units with lead hazards identified
    - No. of units in progress or under contract
    - No. of occupied rental units
    - Unit addresses
    - No. of units assisted with children under 6 years of age
    - Occupancy data on children 6 years of age and over, including adults
    - Blood lead values of children under 6 years of age in units where lead hazard work occurred
    - Age of housing units completed and cleared
    - No. of occupants residing in each unit when lead hazard control work was initiated
    - No. of units completed monthly, quarterly, and annually
    - No. of units cleared monthly, quarterly, and annually
    - Other items as appropriate
3. Maintenance of complete and accurate files
4. Potential items to include in files:
    - Completed intake or application form
    - Family release forms
    - Blood Lead Level tests
    - Lead inspections and Risk Assessment reports
    - Family release forms
    - Executed work authorization form by owner or landlord
    - Lead Hazard Control scope of work and work specifications
    - Relocation notifications
    - Contractor bids for work to be performed
    - Information on selected contractor (*e.g.*, certifications)
    - Information on supervisors and workers (*e.g.*, certifications)
    - Executed contract(s)
    - Clearance test results
    - Other items as appropriate

<u>Subpart B-2: Tracking System</u>

1. System or methodology for tracking cases from intake through clearance
2. Up-to-date system
3. Potential items to include in tracking system:

- Date of referral
- Date of initial application or intake
- Date that application was complete
- BLL test dates
- Date of lead paint testing and results
- Date of risk assessments
- Date that family signed release form
- Date that family was notified of temporary relocation
- Date that family was temporarily relocated
- Date of proposed Lead Hazard Control scope of work
- Date that rehab specifications were finalized
- Date that request for bids was released
- Date that bids were received
- Date that contractor(s) was selected
- Date that contract was executed
- Date that notice to start work was issued
- Date that work began
- Date that work was completed
- Date of initial clearance test results
- Date that work was cleared
- Date that contractor was paid in full
- Date that family was notified to return to their residence
- Other information as appropriate

PART C: OUTREACH AND EDUCATION

Whether a grantee or responsible sub-recipient has an effective outreach and educational network is an indication how well the program is meeting the needs of the community, thereby accomplishing the goals of the OHHLHC grant.

Subpart C-1: Effective Outreach

1. Outreach program or effort consistent with work plan
2. Outreach program still active
3. Staff assigned to outreach
4. Multiple agencies involved (recommended, not required)
5. Adequate steps taken to expand and/or improve outreach

Subpart C-2: Education and Job Training

1. Educational and job development efforts consistent with the work plan
2. Residents from community trained as Lead Hazard Control rehab supervisors or workers, or plans to begin doing so
3. Residents from the community hired as paraprofessionals, professionals, or technical staff to work in the offices of the grantee, and maintained in office

PART D: ELIGIBILITY

Care in assuring that only eligible families receive assistance from the Lead Hazard Control Program is important in assuring that those most in need of protection from the dangers of lead hazards are assisted. The reviewer should assure consistency with the management work plan in the determination of eligibility by the grantee.

Subpart D-1: Property Eligibility

1. Clear process in place for determining which units meet the priorities of the work plan
2. All units receiving Lead Hazard Control work constructed prior to 1978
3. Application review process to screen out ineligible properties inconsistent with work plan and with policies of OHHLHC (*e.g.*, no screening out of Section 8 units)

Subpart D-2: Family Eligibility

1. Decisions about application eligibility consistent with goals of work plan
2. All beneficiaries (except landlords, where applicable) meet income requirements of program
3. Consistent and adequate documentation of family income
4. Program meets the requirements of the Special Condition Clause (Title X Section 1101) of the grant agreement with regard to the prioritization of households with children under the age of 6 years
5. Methodology for requiring landlords to comply with the 3-year requirement for giving priority to families with children under 6 years of age
6. No recipient properties with no children or with no way of verifying whether children frequently visit
7. Sufficient information available to demonstrate compliance with program eligibility criteria, including income where applicable
8. Lack of excessive verification information and/or paperwork required from families given the nature of the program

PART E: PRODUCTION PROCESS OF LHC ACTIVITIES

Subpart E-1: Assessment Activities

1. Preliminary Assessment of the Production Process:
   a) Meeting minimum benchmark performance standards for paint inspections/risk assessments and for units completed and cleared
   b) Preparation of a functional flowchart of production process, accurately dividing activities into various subphases
   c) Case tracking system able to report on the number of cases at each phase of production
   d) Case tracking system able to provide information on the number of days it takes a case to complete each phase of production
2. Detailed Analysis of the Production Process:
   Application Intake:
   a) No backlog of unprocessed applications
   b) Referrals from the local CLPPP Program

c) Assistance of other organizations in application intake and processing (recommended but not required)
d) Application form and required documentation not overly complex
e) Applications screened for eligibility (*e.g.*, within target area, structure of appropriate age, children of appropriate age, household income within target range)
f) Reasonable ratio of units evaluated to units in progress or under contract
g) Evidence of blood lead tests for all children residing in a property prior to initiation of construction

Lead Inspections and Risk Assessments:
a) No backlog of applications awaiting lead inspections or risk assessments
b) Lead inspections and risk assessments conducted by grantee staff members
c) Risk assessment reports conforming to HUD Guidelines, EPA regulation, and/or state or local law

Work write-up and scope of work:
a) Work write-ups document the types of evaluation performed on property including:
   - Visual inspection
   - XRF paint testing
   - Dust wipes/certified lab analysis
   - Risk assessment
b) Copy of inspection/risk assessment report in file
c) Inspector/risk assessor certified by the state/EPA
d) Areas of Lead-Based Paint inspection covers:
   - Interior of the building
   - Exterior of building (bldg. itself)
   - Soils
e) LBP Risk Assessment report presents options for treatment of each lead hazard identified
f) Work write-ups prepared by grantee staff members
g) Work write-ups clearly separate abatement from interim control activities
h) Clearly set maximum cost per unit for Lead Hazard Control work
i) Estimated Lead Hazard Control work costs below maximum allowable cost

<u>Subpart E-2: Contracting Activities</u>
Bids, Contractor Selection:
1. No backlog of properties awaiting requests for bits and contractor selection
2. Bids released and contractors selected in accordance with HUD Procurement Regulations in 24 CFR 85.36
3. Circulation of request for bids limited to a pre-approved list of contractors
4. Pre-bid walk-through inspection with all prospective contractors
5. Small, female-owned, and minority-owned construction firms encouraged to submit bids
6. Method for ensuring that a wide range of contractors participate in Lead Hazard Control grant-funded projects
7. Bid Review and Selection Committee reviews bids

8. Final contract awards approved by an elected body such as a city council or county board of supervisors

Grant and Owner/Contractor Agreements:
1. Separate grant agreement between property owners and Lead Hazard Control Program
2. Separate loan agreement between property owners and Lead Hazard Control Program
3. Formal written contract between owner and contractor selected for Lead Hazard Control work
4. Wording of construction contracts reflects risk assessment findings and work write-ups for each individual property

Resident Protection and Workplace Preparation:
1. Scope of work describes protocol for resident protection during Lead Hazard Control activities
2. Written plan for temporary relocation of residents
3. No delays in resident relocation
4. Monitoring visits to properties undergoing Lead Hazard Control activities by grantee staff to inspect for warning signs, site security, worksite containment, worker decontamination, and debris-handling procedures
5. Contractor's adherence to worksite preparation standards of Chapter 8 of HUD guidelines documented by grantee staff

Hazard Abatement and Interim Control Activities:
1. No backlog of properties awaiting the start of construction
2. Notification by contractor of state regulatory agency and receipt of authorization to begin regulated abatement activities prior to the start of construction
3. Monitoring visits to properties undergoing Lead Hazard Control activities to inspect for evidence of required worker training and the use of materials, components, and equipment specified in the scope of work conducted by grantee staff
4. Established mechanisms for handling change orders
5. Established procedures for tracing activities funded under other HUD programs (*i.e.* HOME or CDBG)
6. Final walk-through at conclusion of construction by owner, contractor, and grantee representative

Clearance Testing:
1. Clearance testing performed upon completion of all Lead Hazard Control activities
2. Clearance testing results reported for all completed units, including laboratory results
3. Final clearance examination conducted by independent inspector, risk assessor, or sampling technician
4. Certification of clearance examiner documented
5. At least one dust wipe sample taken in each room in which work was performed
6. If unit was cleared, dust wipe samples conducted in at least four rooms
7. Documentation of passage of clearance for each unit, or recleaning of units that did not pass until passed

Resident Reentry:
1. Filed copies of laboratory report on clearance dust wipes and soil samples

2. Resident not allowed to reenter unit prior to grantee's receipt and acceptance of laboratory report on final clearance examination
3. Results of clearance examination given to owner and/or tenants of property
4. Completed unit listed in the grantee's registry of lead-safe units

PART G: FINANCIAL

Subpart G-1: Financial Management

Professional financial management of funds received form federal sources is required under OMB Circulars A-87 for state and local governments and A-122 for nonprofit and community-based organizations. Under A-133 for all recipients of federal funds must keep adequate financial records and submit audits as required. The following monitoring exhibits are designed to assist in a review of a grantee's financial management systems for compliance with these requirements.

1. Financial management/accounting system in use by the grantee or sub-recipient
2. Automated financial system
3. Financial reports produced that can easily be read and understood to determine the use of grant funds

Subpart G-2: Financial Record Keeping

1. Accurate and complete financial records on program expenditures maintained
2. Complete accounting for the use of funds on Lead Hazard Control units
3. Comprehensible documentation in financial records of what funds were expended for the lead hazard program versus other programs administered by the organization
4. Preparation and submission of an annual audit
5. Current in submission of financial audits
6. Preparation of a detailed annual financial statement delineating use of funds, accounts receivable, accounts payable, fund balances, salaries and benefits, contract costs, equipment, materials and supplies, overhead and indirect costs, bad debts, and program income

Subpart G-3: Match

1. Accurate records of the match applied to the program
2. Differentiation between in-kind and cash match in how it accounts for the match to be applied toward the program
3. Documentation about match, including the amount booked to date and the sources of the match to be applied toward the program