

Exhibit 15-4
Housing Trust Fund

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PURPOSE

In accordance with the requirements of [24 CFR 93.404\(a\)](#), the grantee is responsible for managing the day-to-day operations of its HTF program and is required to develop and follow comprehensive written program policies and procedures for the administration of its HTF rental program. The regulation at [24 CFR 93.101\(d\)](#) requires the grantee to ensure that its subgrantees comply with the requirements of 24 CFR part 93 and carry out the applicable grantee responsibilities. **Therefore, this Exhibit is used to monitor HTF-assisted rental projects from development through project completion as defined in 24 CFR 93.2.** This Exhibit is also used to monitor the use of HTF funds for operating cost assistance and operating cost assistance reserves. The reviewer can use this Exhibit to monitor a grantee/subgrantee's:

- rental development project files,
- rental development program policies and procedures,
- a combination of both project files and policies and procedures, or
- a renewal of operating cost assistance or operating cost assistance reserve for an HTF rental housing project.

The questions in this Exhibit may also be used as an interview instrument for program staff. The reviewer should use Exhibit-15-5, *Guide for Review of Rental Project Compliance and/or Policies and Procedures*, to monitor a completed HTF-assisted rental project for ongoing compliance during the HTF period of affordability.

INSTRUCTIONS

Based on the risk analysis results, the monitoring strategy, and the notification letter sent to the grantee, indicate the type of monitoring being conducted (page 15-1) and check the program area(s) under review (page 15-5) and answer the questions under each program area.

- Where applicable, this Exhibit pairs each project requirement with the policies and procedures requirement. Reviewers are not required to complete both questions if the monitoring does not address both policies and procedures and project requirements. However, if project noncompliance is found, then the reviewer *must* examine the related policies and procedures to determine if the finding is associated with a lack of adequate policies and procedures, or a failure of the grantee/subgrantee staff to follow the written policies and procedures.
- Reviewers must adequately describe the basis for any findings in the “Describe Basis for Conclusion” section of each question, being careful to note which project file is noncompliant and why.
- When reviewing subgrantee project files during a monitoring, the reviewer must also include a citation to [24 CFR 93.101\(d\)](#) when citing a regulatory violation.
- Reviewers should make every effort to examine as many program areas as possible to obtain an accurate representation of the grantee/subgrantee's compliance with the HTF program requirements.
- If a specific program area is not examined, check the applicable “Not Reviewed” box at the beginning of each program area and note the reason why.
- Reviewers can use this Exhibit to review up to **five** rental development project files. If additional files are included in the monitoring, the reviewer should complete another copy of the Exhibit. Section 15-4 in the introduction to this Chapter provides guidance on the number of files to review.

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- Complete other Exhibits, as applicable:
 - ✓ *Chapter 24: Lead-Based Paint Compliance (Exhibits 24-1 and 24-2, as applicable) for question #79*
 - ✓ *Chapter 34: Exhibit 34-3a: Guide for Review of Procurement for question #112.*

Reviewers must address the following:

- Complete the **File Selection Summary Table** (page 15-6)
- Review the **Recipient Written Agreement** program area for all files monitored

If the Reviewer is reviewing a project that is solely the renewal of operating cost assistance or operating cost assistance reserves, the Reviewer should review Program Area F of this Exhibit.

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PROGRAM AREAS TO REVIEW

Instructions: Check the program areas reviewed during monitoring:

- A. Recipient Written Agreement (Required);
- B. Project Selection, Commitment & Project Set-Up;
- C. HTF Underwriting & Subsidy Layering;
- D. Cost Allocation;
- E. Eligible/Reasonable Costs;
- F. Operating Cost Assistance & Operating Cost Assistance Reserves;
- G. Eligible Public Housing Use;
- H. Audit;
- I. Property Standards;
- J. Environmental Requirements;
- K. Displacement, Relocation, & Acquisition;
- L. Affordability Requirements;
- M. Procurement and Contractor Oversight;
- N. Project Completion; and
- O. Record Retention

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FILE SELECTION SUMMARY TABLE

For Project File Reviews: Include the following information for each file reviewed. When completing the *project-specific Exhibit* questions that follow, include the file or Integrated Disbursement and Information System (IDIS) number as a reference to the project file reviewed.

Files #	Project Name/Address¹	IDIS #	HTF Allocation Plan Year	HTF Funds Committed	Written Agreement Date	HTF Funds Drawn	Completion Date	Total Units	HTF-assisted Units
1.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.	Click or tap here to enter text.
2.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.	Click or tap here to enter text.
3.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.	Click or tap here to enter text.
4.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.	Click or tap here to enter text.
5.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.	Click or tap here to enter text.

¹ The inclusion of personally identifiable information (PII) should be limited. PII includes any information that is linked or linkable to an individual, such as first and last name, home or cell telephone numbers, address, and social security numbers. To the greatest extent feasible, monitors should use a method of identifying files reviewed that does not include PII.

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A. RECIPIENT WRITTEN AGREEMENT (REQUIRED)

Instructions: Since written agreements are central to initial and ongoing compliance with HTF requirements, reviewers monitoring project files **MUST*** evaluate the written agreements for the HTF activities being monitored. If project noncompliance is found, the reviewer **MUST** also examine the related policies and procedures to determine if the finding is associated with a lack of policies and procedures, or a failure of grantee/subgrantee staff to follow the written policies and procedures.

*If the reviewer is monitoring only the grantee/subgrantee’s policies and procedures, completion of the project file questions is not required.

Use of the HTF Funds

1.

Does the written agreement between a grantee/subgrantee and an eligible recipient describe the use of HTF funds, including items (a)-(d), in sufficient detail to provide a sound basis for the grantee/subgrantee to effectively monitor performance under the agreement:					
[24 CFR 93.404(c)(2)(i), 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. Amount and use of HTF fund for the project?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Describe the tasks to be performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Schedule for completing the tasks and project (including the expenditure detail)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Project budget (i.e., all sources and uses)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

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2.

If the written agreement permits the use of HTF funds to pay for costs incurred before the date the HTF funds were committed to the project (the “HTF commitment date”), did the written agreement:

[[24 CFR 93.404\(c\)\(2\)\(i\)](#) and [24 CFR 93.201\(d\)\(1\)](#) and [\(h\)](#), [24 CFR 93.101\(d\)](#) for subgrantee]

	File #1:	File #2:	File #3:	File #4:	File #5:
a. Only describe costs incurred not more than 24 months before the HTF commitment date?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
b. Limit the costs paid before the HTF commitment date to architectural, engineering, or related professional services required to prepare plans, drawings, specifications, or work write-ups?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Describe Basis for Conclusion:

Click or tap here to enter text.

Deadlines

3.

Does the written agreement state the time requirements for the expenditure of HTF funds and specify that remaining funds will be reduced or recaptured?

[[24 CFR 93.404\(c\)\(2\)\(ii\)](#), [24 CFR 93.101\(d\)](#) for subgrantee]

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No

Describe Basis for Conclusion:

Click or tap here to enter text.

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Audit

4.

Does the written agreement specify that the recipient will submit the following to the grantee/subgrantee:					
[24 CFR 93.404(c)(2)(iii), 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. A cost certification performed by a certified public accountant for the HTF-assisted project?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. An annual audit performed on the HTF-assisted project, beginning the first year following the cost certification and with final annual audit occurring the last year of the affordability period?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

Affordability

5.

Does the written agreement include the following provisions:					
[24 CFR 93.404(c)(2)(iv), 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. Specify the affordability period? NOTE: The affordability period cannot be less than 30 years in accordance with 24 CFR 93.302 .	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Require housing assisted with HTF funds to meet the affordability requirements of 24 CFR 93.302 ?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Require repayment of HTF funds if the housing does not meet the affordability requirements for the 30-year period of affordability?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

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Rents

6.

Does the written agreement establish the initial rents and procedures for rent increases?	
[24 CFR 93.404(c)(2)(iv), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Unit Designation

7.

Does the written agreement address the following requirements:					
[24 CFR 93.404(c)(2)(iv), 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. Specify the number of HTF-assisted units in the project?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Specify the size of the HTF-assisted units (one, two bedrooms, etc.)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Designate the HTF-assisted units as fixed or floating in accordance with 24 CFR 93.302(g) ?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Require the recipient to provide the address and unit number of each HTF-assisted unit no later than the time of project completion?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

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Project Requirements
Property Standards

8.

Does the written agreement require that HTF-assisted housing meet the applicable property standards in [24 CFR 93.301](#) upon project completion?

- New construction projects, [24 CFR 93.301\(a\)](#)
- Rehabilitation projects, [24 CFR 93.301\(b\)](#)
- Acquisition of standard housing, [24 CFR 93.301\(c\)](#)
- Manufactured housing, [24 CFR 93.301\(d\)](#)

NOTE: There has been a change in the required housing standards (UPCS vs. NSPIRE) for projects involving rehabilitation (including manufactured housing) or acquisition of rental housing. Check the date of the written agreement to determine which housing standards apply (UPCS or NSPIRE).

The housing standard that applies is based on the housing standard that is in effect at the time of the HTF commitment. For projects for which the grantee/subgrantee committed HTF funds:

- Before October 1, 2025, the grantee/subgrantee’s rehabilitation standards must ensure that upon project completion, units will be decent, safe, sanitary, and in good repair as described in [24 CFR 5.703](#), Uniform Physical Condition Standards (UPCS).
- On or after October 1, 2025, the grantee/subgrantee’s rehabilitation standards must require that upon project completion, units will be decent, safe, sanitary and in good repair and meet the standards in [24 CFR 5.703](#), The National Standards for the Physical Inspection of Real Estate (NSPIRE). The carbon monoxide detection requirement at [24 CFR 5.703\(b\)\(2\)](#) and [\(d\)\(6\)](#) and the requirements at [24 CFR 5.705](#) through [5.713](#) do not apply to HTF-assisted projects. At minimum, the grantee’s rehabilitation standards must require correction of the specific deficiencies published in the Federal Register for HTF-assisted projects and units. For SRO housing, the requirements at [24 CFR 5.703\(d\)](#) shall only apply to the extent that the SRO unit contains the room or facility referenced in [24 CFR 5.703\(d\)](#).

[[24 CFR 93.404\(c\)\(2\)\(v\)](#), [24 CFR 93.101\(d\)](#) for subgrantee]

File	Enter date of written agreement	
#1:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#2:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#3:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#4:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#5	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Describe Basis for Conclusion:

Click or tap here to enter text.

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9.

Does the written agreement require the project owner to maintain the HTF-assisted housing in compliance with ongoing property standards of [24 CFR 93.301\(e\)](#) for the duration of the period of affordability?

NOTE: There has been a change in the required housing standards (UPCS vs. NSPIRE) for rental projects. Check the date of the written agreement to determine which housing standards apply (UPCS or NSPIRE).

In accordance with [24 CFR 93.301\(e\)](#), the grantee/subgrantee’s ongoing property condition standards for rental housing (including manufactured housing) must require project owners to comply with the standards in effect at the time of the HTF commitment. For projects for which the grantee/subgrantee committed HTF funds:

- Before October 1, 2025, project owner must maintain housing as decent, safe and sanitary housing in good repair and address all inspectable items and inspectable areas specified by HUD based on the HUD physical inspection procedures (UPCS) prescribed by HUD pursuant to [24 CFR 5.705](#).
- On or after October 1, 2025, project owner must ensure property does not contain the specific deficiencies established by HUD based on the applicable standards in [24 CFR 5.703](#), The National Standards for the Physical Inspection of Real Estate (NSPIRE) and published in the **Federal Register** for rental housing (including manufactured housing). The requirements in [24 CFR 5.705](#) through [5.713](#) do not apply to the grantee/subgrantee's ongoing property standards.

[[24 CFR 93.404\(c\)\(2\)\(v\)](#), [24 CFR 93.101\(d\)](#) for subgrantee]

File	Enter date of written agreement	
#1:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#2:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#3:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#4:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#5:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Describe Basis for Conclusion:

Click or tap here to enter text.

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Tenant Protections & Selection

10.

Does the written agreement require the project owner to comply with the tenant protections and selection requirements in 24 CFR 93.303 ?	
[24 CFR 93.404(c)(2)(v), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

11.

<i>If the written agreement permits the owners of rental housing to limit eligibility or give preference to a particular segment of the population, is such limitation and/or preference described in the grantee/subgrantee's HTF Allocation plan?</i>	
NOTE: Any limitation or preference cannot violate nondiscrimination requirements in 24 CFR 93.350 .	
[24 CFR 93.404(c)(2)(v), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

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Other Program Requirements

12.

Does the written agreement require the eligible recipient to carry out each project in compliance with all Federal laws and regulations described in 24 CFR 93.350 through 24 CFR 93.355 ?					
[24 CFR 93.404(c)(1)(vi), 24 CFR 93.101(d) for subgrantee]					
	File # 1:	File # 2:	File # 3:	File # 4:	File # 5:
a. Other federal requirements and nondiscrimination 24 CFR 93.350	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Lead-based paint requirements 24 CFR 93.351	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. Displacement, relocation, and acquisition 24 CFR 93.352	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. Conflict of interest 24 CFR 93.353	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. Funding Accountability and Transparency Act 24 CFR 93.354	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
f. Eminent domain 24 CFR 93.355	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

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VAWA

13.

Does the written agreement set forth all obligations the grantee/subgrantee imposes on the recipient in order to meet the VAWA requirements under 24 CFR 93.356 , including notice obligations and obligations under the emergency transfer plan?	
[24 CFR 93.404(c)(2)(vi), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

Affirmative Marketing

14.

Does the written agreement require compliance with and specify the recipient's affirmative marketing responsibilities, as enumerated by the grantee in accordance with 24 CFR 93.350 ?	
[24 CFR 93.404(c)(2)(v) and (vii), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

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Requests for Disbursement of funds

15.

Does the written agreement specify that the recipient cannot request disbursement of funds under the agreement until the funds are needed for payment of eligible costs <u>and</u> each request is limited to the amount needed?	
[24 CFR 93.404(c)(2)(viii), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Records and Reports

16.

Does the written agreement specify the particular records that must be maintained and the information or reports that must be submitted to assist the grantee/subgrantee in meeting its record keeping and reporting requirements?	
[24 CFR 93.404(c)(2)(ix), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

17.

Does the written agreement require the project owner to annually provide the grantee/subgrantee with rent and occupancy information on HTF-assisted units to demonstrate compliance with 24 CFR 93.302 (e.g., rent, income, and onsite inspection requirements)?	
[24 CFR 93.404(c)(2)(ix), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

18.

If the rental housing project has floating HTF units, does the written agreement require the owner to provide the grantee/subgrantee with information regarding unit substitution and filling vacancies so that the project owner remains in compliance with HTF rental occupancy requirements?

[\[24 CFR 93.404\(c\)\(2\)\(ix\), 24 CFR 93.101\(d\) for subgrantee\]](#)

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Describe Basis for Conclusion:

Click or tap here to enter text.

19.

Does the written agreement specify the reporting requirements (including copies of financial statements) to enable the grantee/subgrantee to examine the financial condition and continued financial viability of the rental project?

[\[24 CFR 93.404\(c\)\(2\)\(ix\), 24 CFR 93.101\(d\) for subgrantee\]](#)

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Describe Basis for Conclusion:

Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

Enforcement of the Agreement

20.

Does the written agreement include the following provisions:					
[24 CFR 93.404(c)(2)(x), 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. Provide for a means of enforcing the affordable housing requirements by the grantee/subgrantee and the intended beneficiaries (i.e., deed restrictions, covenants running with the land, use restrictions, or other mechanisms approved by HUD under which the grantee and beneficiaries may require specific performance)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. Specify remedies for breach of the provisions of the written agreement?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.					

Duration of the Agreement

21.

Does the written agreement specify the duration of the agreement, which at minimum, must be for the affordability period required by the grantee/subgrantee under 24 CFR 93.302 (minimum 30 years)?	
[24 CFR 93.404(c)(2)(xi), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

Fees

22.

Does the written agreement prohibit project owners from charging origination fees, parking fees, laundry room access fees, and other fees?	
NOTE: Owners may charge reasonable application fees to prospective tenants.	
[24 CFR 93.404(c)(2)(xii), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

B. PROJECT SELECTION, COMMITMENT & PROJECT SET-UP

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

Commitment

23.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Before committing HTF funds, did the grantee/subgrantee execute a legally binding written agreement with the recipient (project owner or developer)? [24 CFR 93.2 Definition of Commitment, 24 CFR 93.101(d) for subgrantee]
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5: <input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

24.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Does the written agreement include the dated signature of each party to the agreement as required by 24 CFR 93.2 definitions of <i>Commitment</i> and <i>Commit to a Specific local project</i> ? [24 CFR 93.2, 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

25.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the project consists of rehabilitation or new construction (with or without acquisition),</i> does the written agreement under which HTF assistance will be provided to the recipient describe an identifiable project for which construction can reasonably be expected to start within 12 months of the agreement date? [24 CFR 93.2 Definition of Commit to a specific local project (i), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

26.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the project file include a complete, executed copy of the written agreement, including any amendments to the agreement? [24 CFR 93.407(a)(2)(xi), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

Recipient Assessment

27.

Before awarding HTF funds to an applicant, did the grantee/subgrantee determine the applicant was an eligible recipient that met the definition of “recipient” in 24 CFR 93.2 ?					
[24 CFR 93.101(c), 24 CFR 93.101(d) for subgrantee]					
Specifically, is there documentation that the recipient:	File #1:	File #2:	File #3:	File #4:	File #5:
a. Made acceptable assurance (i.e., a certification) to the grantee that the recipient would comply with HTF requirements during the entire period, beginning upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
[24 CFR 93.2 Recipient]					
b. Demonstrated the ability and financial capacity to undertake, comply, and manage the eligible activity?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
[24 CFR 93.2 Recipient]					
c. Demonstrated its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
[24 CFR 93.2 Recipient]					
d. Had demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
[24 CFR 93.2 Recipient]					
Describe Basis for Conclusion: Click or tap here to enter text.					

Exhibit 15-4
Housing Trust Fund

IDIS Project Set-Up

28.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Before disbursing any HTF funds, did the grantee/subgrantee execute a written agreement with the recipient (project owner or developer)? [24 CFR 93.404(b), 24 CFR 93.101(d) for subgrantee]</p>		
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. IDIS initial disbursement of funds date: Click or tap here to enter text.</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. IDIS initial disbursement of funds date: Click or tap here to enter text.</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. IDIS initial disbursement of funds date: Click or tap here to enter text.</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. IDIS initial disbursement of funds date: Click or tap here to enter text.</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. IDIS initial disbursement of funds date: Click or tap here to enter text.</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>			

Exhibit 15-4
Housing Trust Fund

29.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Did the grantee/subgrantee set-up the project (i.e., fund the project) in IDIS following the execution of the written agreement and submittal of the applicable banking and security documents?</p> <p>NOTE: The date of the original written agreement must be the same as, or prior to, the project's <i>Initial Funding Date</i> in IDIS.</p> <p>[24 CFR 93.402(b), 24 CFR 93.101(d) for subgrantee]</p>		
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Written Agreement Date: Click or tap here to enter text. Initial Funding Date in IDIS: Click or tap here to enter text.</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>Written Agreement Date:</i> Click or tap here to enter text. <i>Initial Funding Date in IDIS:</i> Click or tap here to enter text.</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>Written Agreement Date:</i> Click or tap here to enter text. <i>Initial Funding Date in IDIS:</i> Click or tap here to enter text.</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>Written Agreement Date:</i> Click or tap here to enter text. <i>Initial Funding Date in IDIS:</i> Click or tap here to enter text.</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><i>Written Agreement Date:</i> Click or tap here to enter text. <i>Initial Funding Date in IDIS:</i> Click or tap here to enter text.</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>			

Exhibit 15-4
Housing Trust Fund

Site and Neighborhood Standards

30.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the project involves new construction</i> , did the grantee/subgrantee make the determination that that the proposed site met the requirements in 24 CFR 983.55(e)(2) ?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

C. HTF UNDERWRITING & SUBSIDY LAYERING

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

31.

Did the grantee/subgrantee adopt underwriting and subsidy layering guidelines for its HTF program? [24 CFR 93.300(b), 24 CFR 93.101(d) for subgrantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

32.

Do the underwriting and subsidy layering guidelines adopted by the grantee require the grantee to determine a reasonable level of profit or return on recipient’s investment in a project?

[\[24 CFR 93.300\(b\), 24 CFR 93.101\(d\) for subgrantee\]](#)

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Describe Basis for Conclusion:
Click or tap here to enter text.

33.

Do the underwriting and subsidy layering guidelines adopted by the grantee require the grantee to undertake the following:

[\[24 CFR 93.300\(b\), 24 CFR 93.101\(d\) for subgrantee\]](#)

	File #1:	File #2:	File #3:	File #4:	File #5:
a. An examination of the sources and uses of funds (including any operating cost assistance, operating cost assistance reserves, or project-based rental assistance) for the project and a determination that costs are reasonable? [24 CFR 93.300(b)(1)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. An assessment of the current market demand in the area where the project is located? [24 CFR 93.300(b)(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
c. An assessment of the experience of the recipient? [24 CFR 93.300(b)(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
d. An assessment of the financial capacity of the recipient? [24 CFR 93.300(b)(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
e. An assessment of firm written financial commitments for the project? [24 CFR 93.300(b)(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Describe Basis for Conclusion:
Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

34.

Before committing HTF funds to the project (i.e., executing a written agreement), did the grantee/subgrantee evaluate the project in accordance with its adopted guidelines for determining a reasonable level of profit or return on recipient's investment in a project?

[\[24 CFR 93.300\(b\), 24 CFR 93.101\(d\) for subgrantee\]](#)

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
----------	---

File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
----------	---

File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
----------	---

File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
----------	---

File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
----------	---

Describe Basis for Conclusion:

Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

35.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the project file include records that the grantee performed a subsidy layering and underwriting evaluation in accordance with 24 CFR 93.300(b) that examined all of the following: [24 CFR 93.407(a)(2)(iii), 24 CFR 93.300(b), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		File #1:	File #2:	File #3:	File #4:	File #5:
	<p>a. Firm financial commitments? [93.300(b)(2)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>b. Sources and uses of funds? [93.300(b)(1)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>c. Project budget and schedule?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>d. Assessment of the current market demand in the neighborhood of the project? [93.300(b)(2)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>e. Experience and financial capacity of the recipient? [93.300(b)(2)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

Maximum Subsidy Limits

A grantee must establish maximum per-unit development subsidy limits for its HTF program and submit it annually with its HTF allocation plan. The grantee may establish its own limit or adopt an existing limit developed for a federal program such as HOME's subsidy limits, Low Income Housing Tax Credit per unit cost limits, and Public Housing Development Cost limits. A subgrantee must use the maximum per-unit subsidy limits established by the HTF grantee.

Indicate which of the maximum per-unit subsidy limits listed below, the grantee established for its HTF program and the limit amount that applies to the project(s) under review:

- Grantee established its own limit,
- HOME's maximum per-unit subsidy limits
- Low Income Housing Tax Credit per unit cost limits
- Public Housing Development Cost limits

36.

File #	Written Agreement Date	Indicate the Established Limit and Amount	Per-Unit Subsidy Provided to Project?
1.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
2.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
3.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
4.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
5.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

37.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Was the amount of HTF funds invested in the project at or below the applicable maximum per-unit subsidy limit?</p> <p>NOTE: In accordance with 24 CFR 93.200(a)(1), operating cost assistance or operating cost assistance reserves are capped at 30 percent of each HTF annual grant.</p> <p>[24 CFR 93.300(a), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

38.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Are there records that demonstrate that the amount of HTF funds invested in the project is at or below the applicable maximum per-unit subsidy limit?</p> <p>NOTE: In accordance with 24 CFR 93.200(a)(1), operating cost assistance or operating cost assistance reserves are capped at 30 percent of each HTF annual grant.</p> <p>[24 CFR 93.300(a), 24 CFR 93.407(a)(2)(iii), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

Form of Assistance

39.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Was the HTF assistance provided as an equity investment; interest-bearing or non-interest-bearing loan or advance; interest subsidies consistent with the purposes of this part; deferred payment loan, grant, or other form of assistance HUD determined to be consistent with the purposes of this part? [24 CFR 93.407(a)(1), 24 CFR 93.200(b), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

D. COST ALLOCATION

Check the requirement or program area reviewed:	
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.	
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.	
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.	

Cost allocation is the process of calculating the development costs that are charged to HTF and is based on the actual eligible development costs of the units that are HTF-assisted. Cost allocation is required in any HTF rental project where not all units are HTF-assisted (e.g., a mixed-income project); and/or in which the space is not exclusively residential (e.g., a mixed-use project). In addition, cost allocation is required for a 2-4-unit property in which one of the units is occupied by the owner and not all the units are HTF-assisted.

40.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Were only the actual HTF eligible development costs of HTF-assisted units charged to the HTF program? [24 CFR 93.200(c), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion:		

Exhibit 15-4
Housing Trust Fund

Click or tap here to enter text.

41.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If fewer than 100% of the units are HTF-assisted or the project is a mixed-used property that includes commercial space, did the grantee/subgrantee allocate costs for HTF-assisted units to the HTF program in accordance with 2 CFR 200.405?</i> [24 CFR 93.405; 2 CFR 200.405, 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

42.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the grantee/subgrantee determined the actual costs of the HTF-assisted units by prorating the total HTF-eligible development costs of the project so that the proportion of total development costs charged to the HTF program did not exceed the proportion of HTF-assisted units in the project, did the grantee/subgrantee determine that the assisted and non-assisted units were comparable in terms of size, features, and number of bedrooms?</i> [24 CFR 93.200(c)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

E. ELIGIBLE/REASONABLE COSTS

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

43.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Were all project costs paid with HTF funds eligible costs under 24 CFR 93.201 or 24 CFR 93.202 ? [24 CFR 93.201 (eligible project costs), 24 CFR 93.202 (administrative and planning), 24 CFR 93.204 (prohibited activities and fees), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

44.

<i>If HTF funds were used to pay for costs incurred before the date the HTF funds were committed to the project (the "HTF commitment date"):</i>					
[24 CFR 93.404(c)(2)(i) and 24 CFR 93.201(d)(1) and (h) , 24 CFR 93.101(d) for subgrantee]					
	File #1:	File #2:	File #3:	File #4:	File #5:
a. Did the written agreement contain provisions allowing the use of HTF funds for costs incurred before the HTF commitment date?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
b. Were the costs incurred not more than 24 months before the HTF commitment date?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
c. Were the costs limited to architectural, engineering, or related professional services required to prepare plans, drawings, specifications, or work write-ups?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.					

Exhibit 15-4
Housing Trust Fund

45.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used to pay costs to refinance existing debt secured by rental housing units being rehabilitated with HTF funds:</i> [24 CFR 93.201(b)(1), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		<p>File #1:</p>	<p>File #2:</p>	<p>File #3:</p>	<p>File #4:</p>	<p>File #5:</p>
	<p>a. Was the refinancing necessary to reduce the overall housing costs and make the housing more affordable?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>b. Was the refinancing proportional to the number of HTF-assisted units in the rental project (the proportional rehabilitation cost must be greater than the proportional amount of debt that is refinanced)?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

46.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used to pay costs to refinance existing debt secured by rental housing units being rehabilitated with HTF funds, did the grantee/subgrantee follow its refinancing guidelines that:</i></p> <p>[24 CFR 93.201(b)(2), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		File #1:	File #2:	File #3:	File #4:	File #5:
	<p>a. Are in its consolidated plan described in 24 CFR part 91?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>b. Describe the conditions under which the grantee will refinance existing debt?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	<p>c. At minimum, demonstrate that rehabilitation is the primary eligible activity by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

47.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee ensure the construction contracts(s) and construction documents describe the work to be undertaken in adequate detail so that inspections can be conducted? [New construction 24 CFR 93.301(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

48.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee review and approve written cost estimates for new construction or rehabilitation, as applicable, and determine that costs are reasonable? [24 CFR 93.301(a)(2)(iv) for new construction projects, 24 CFR 93.301(b)(2) for rehabilitation projects, 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

49.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee adequately document the source and application of HTF funds, in accordance with 2 CFR 200.333 through 2 CFR 200.337 ? [24 CFR 93.407(a)(2)(ii), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

50.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the project file include records to document <i>all</i> of the following: [24 CFR 93.407(a)(2)(ii), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>						
	<p>1. Eligibility of project costs?</p>	<p>File #1: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #2: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #3: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #4: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #5: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>2. Allowability of project costs?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>					

Exhibit 15-4
Housing Trust Fund

F. OPERATING COST ASSISTANCE & OPERATING COST ASSISTANCE RESERVES

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

HTF funds may be used to pay for operating cost assistance and operating cost assistance reserves for HTF-assisted units for which project-based assistance is not available, when necessary and subject to the limitations in [24 CFR 93.200\(a\)](#) (i.e., not to exceed one third of each annual HTF grant). The maximum amount of operating cost operating assistance and operating cost assistance reserves must be committed and specified in a written agreement between the grantee/subgrantee and the recipient.

If the monitor is reviewing a project that consists solely of a renewal of operating cost assistance or operating cost assistance reserve for an HTF rental housing project, the monitor must complete all questions in this program area associated with the operating cost assistance or operating cost assistance reserve, as applicable.

51.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the project is for renewal of operating cost assistance or operating cost assistance reserves, did the grantee/subgrantee and the recipient execute a legally binding written agreement (or an amendment to an existing written agreement) under which HTF funds will be provided to the recipient for operating cost assistance or operating cost assistance reserves for the identified HTF project?</i>	
	[24 CFR 93.2 Definition of Commit to a specific local project (iii), 24 CFR 93.201(e), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

52.

<p><i>If the grantee/subgrantee provided operating cost assistance</i>, does the written agreement include the following provisions, as required by 24 CFR 93.201(e):</p> <p>[24 CFR 93.404(c)(2)(i), 24 CFR 93.201(e), 24 CFR 93.101(d) for subgrantee]</p>					
	File #1:	File #2:	File #3:	File #4:	File #5:
<p>a. The maximum amount of operating cost assistance to be provided to the HTF-assisted rental project?</p> <p>NOTE: The maximum amount of operating cost assistance provided to an HTF-assisted rental project must be based on the underwriting of the project.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>b. Operating cost assistance is limited to pay the amount of the deficit remaining after the monthly rent payment for the HTF-assisted unit is applied to the HTF-assisted unit's share of monthly operating costs?</p> <p>NOTE: Operating costs are costs for insurance, utilities, real property taxes, and maintenance and scheduled payments to a reserve for replacement of major systems (provided that the payments must be based on the useful life of each major system and expected replacement cost) of an HTF-assisted unit. See 24 CFR 93.201(e)(1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>c. Period for which operating cost assistance is committed to the HTF-assisted rental project?</p> <p>NOTE: Operating cost assistance may be committed for a multiyear period, provided the grantee is able to meet its expenditure deadline in 24 CFR 93.400(d).</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>					

Exhibit 15-4
Housing Trust Fund

53.

<p><i>If the grantee/subgrantee provided HTF funds for an operating cost assistance reserve, does the written agreement include the following provision, as required by 24 CFR 93.201(e):</i></p> <p>[24 CFR 93.404(c)(2)(i); 24 CFR 93.201(e), 24 CFR 93.101(d) for subgrantee]</p>					
	File #1:	File #2:	File #3:	File #4:	File #5:
<p>a. Maximum amount of operating cost assistance provided to the HTF-assisted rental project as a reserve?</p> <p>NOTE: The maximum amount of operating cost assistance provided to an HTF-assisted rental units in a project must be based on the underwriting of the project.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>b. Operating cost assistance from the operating cost assistance reserve is limited to pay the amount of the deficit remaining after the monthly rent payment for the HTF-assisted unit is applied to the HTF-assisted unit's share of monthly operating costs?</p> <p>NOTE: Operating costs are costs for insurance, utilities, real property taxes, and maintenance and scheduled payments to a reserve for replacement of major systems (provided that the payments must be based on the useful life of each major system and expected replacement cost) of an HTF-assisted unit. See 24 CFR 93.201(e)(1)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>c. Period for which the operating cost assistance reserve is being funded?</p> <p>NOTE: The period must correspond with the maximum amount of the operating cost assistance reserve. If the operating cost assistance reserve is funded with appropriated HTF funds, the allowable amount of the reserve shall not exceed the amount determined by the grantee to be necessary to provide operating cost assistance for HTF-assisted units, for a period not to exceed 5 years, based on an analysis of potential deficits remaining after the expected rent payments for the HTF-assisted unit are applied to the HTF-assisted unit's expected share of operating costs. If the operating cost assistance reserve is funded with non-appropriated HTF funds, the reserve may be funded for the period of affordability based on the deficit remaining after the monthly rent payment for the HTF-assisted unit is applied to the HTF-assisted unit's share of monthly operating costs.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>					

Exhibit 15-4
Housing Trust Fund

54.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If an operating cost assistance or operating cost assistance reserve was provided to rental housing, was the housing acquired, rehabilitated, reconstructed, or newly constructed with HTF funds?</i> [24 CFR 93.200(a)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

55.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If an operating cost assistance or operating cost assistance reserve was provided to rental housing, was the operating cost assistance or operating cost assistance reserve provided only to HTF-assisted units for which project-based assistance is not available?</i> [24 CFR 24 CFR 93.201(e), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

56.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If an operating cost assistance reserve was provided for the HTF-assisted unit(s), did the grantee/subgrantee determine in its underwriting of the project that the reserve was necessary to ensure the project’s financial feasibility?</i></p> <p>NOTE: Typically, a grantee will have a project financial proforma showing that the HTF-assisted units required operating assistance to address an operating deficit, and the reserve is equal to the amount to cover the deficit over a period of time (not to exceed 5 years). The regulation at 24 CFR 93.201(e)(2) requires the amount of reserve to not exceed the amount determined by the grantee to be necessary to provide operating cost assistance for HTF-assisted units based on an analysis of potential deficits.</p> <p>[A] HTF-assisted units’ expected rent payments (rent revenue) MINUS (-) [B] HTF-units’ expected share of operating costs (expenses) [C] EQUALS (=) Deficit to be offset by operating cost assistance reserve funds.</p> <p>[Rent Revenue] minus [operating costs] = [Deficit]</p> <p>[24 CFR 93.201(e)(2), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

57.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If an operating cost assistance reserve was funded with appropriated HTF funds, did the grantee/subgrantee limit the reserve amount to the amount determined by the grantee to be necessary to provide operating cost assistance for the HTF-assisted units for a period not to exceed five (5) years?</i></p> <p>NOTE: Operating cost assistance reserves funded with <i>non-appropriated</i> HTF funds may be funded for the period of affordability.</p> <p>[24 CFR 93.201(e)(2), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

58.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the grantee/subgrantee renewed the operating cost assistance or operating cost assistance reserves, was the amount based on the need at the time assistance was renewed?</i></p> <p>[24 CFR 93.201(e)(1) and (2), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

G. ELIGIBLE PUBLIC HOUSING USE

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

59.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If HTF funds were used for new construction of public housing units</i> , were the funds used for new construction of public housing as part of HUD’s Choice Neighborhoods program, or for new construction of public housing units that received Low-Income Housing Tax Credits under Section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42)? [24 CFR 93.203(a)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

60.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used for rehabilitation of existing public housing units</i>, were the funds used under one of the eligible options in 24 CFR 93.203(a)(2) as follows:</p> <ul style="list-style-type: none"> • Used for rehabilitation of existing public housing where public housing assistance was converted and used at the property under HUD’s Rental Assistance Demonstration (RAD) program (HUD’s 2012 Appropriation Act- Pub. L.112-55, 125 Stat.552, approved November 18, 2011, or subsequent statutes)? • Used for rehabilitation of existing public housing as part of HUD’s Choice Neighborhoods program? • Used for rehabilitation of existing public housing that received Low-Income Housing Tax Credits under Section 42 of the Internal Revenue Code of 1986 (26 U.S.C. 42)? <p>[24 CFR 93.203(a)(2), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

61.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used for new construction of public housing units</i>, was the number of public housing units constructed equal to or less than the number of public housing units removed from the public housing agency’s inventory as part of a Choice program grant or a mixed-finance development under section 35 of the U.S. Housing Act of 1937 (42 USC 1437 et seq.)? [24 CFR 93.203(b), 24 CFR 93.101(d) for subgrantee]</p>		
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Number of public housing units constructed? Click or tap here to enter text. Number of public housing units removed from PHA’s inventory? Click or tap here to enter text.</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Number of public housing units constructed? Click or tap here to enter text. Number of public housing units removed from PHA’s inventory? Click or tap here to enter text.</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Number of public housing units constructed? Click or tap here to enter text. Number of public housing units removed from PHA’s inventory? Click or tap here to enter text.</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Number of public housing units constructed? Click or tap here to enter text. Number of public housing units removed from PHA’s inventory? Click or tap here to enter text.</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p>Number of public housing units constructed? Click or tap here to enter text. Number of public housing units removed from PHA’s inventory? Click or tap here to enter text.</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>			

Exhibit 15-4
Housing Trust Fund

62.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Did the public housing units constructed under 24 CFR 93.203(b) receive Public Housing Operating Fund assistance under Section 9 of the U.S. Housing Act of 1937 (42 USC 1437g et seq.)? NOTE: The units may also receive Public Housing Capital Fund assistance. [24 CFR 93.203(b), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

63.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used for new construction or rehabilitation of affordable housing units in a project that also contains public housing units</i>, did the project comply with the following requirements: [24 CFR 93.203(d), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		File #1:	File #2:	File #3:	File #4:	File #5:
	<p>a. The HTF-assisted units that are not public housing units that meet the applicable requirements in 93.203(a) and (b) do not receive Operating Fund or Capital Fund assistance under section 9 of the 1937 Act during the HTF period of affordability? [24 CFR 93.203(c)]</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<p>Yes</p>	Yes	Yes	Yes	Yes	Yes
	<p>No</p>	No	No	No	No	No
<p>b. No HTF funds were used for public housing units other than those that met the applicable requirements in 93.203(a) and (b)? [24 CFR 93.203(d)]</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>c. The HTF funds were used for eligible costs only? [24 CFR 93.203(d)]</p>	Yes	Yes	Yes	Yes	Yes	
<p>No</p>	No	No	No	No	No	
<p>N/A</p>	N/A	N/A	N/A	N/A	N/A	
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

H. AUDIT

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

64.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the project owner submit to the grantee/subgrantee a cost certification performed by a certified public accountant for the HTF-assisted project, in accordance with the written agreement providing HTF assistance? [24 CFR 93.406(b); 24 CFR 93.404(c)(2)(iii), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

I. PROPERTY STANDARDS

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

In this section, the monitor will conduct a review for compliance with property standards for the following HTF activities: new construction, rehabilitation, acquisition of standard housing, and construction of manufactured housing.

New Construction

Instruction: For new construction activities, the monitor should complete this section as well as Environmental Requirements and Broadband Infrastructure, if applicable. In accordance with [24 CFR 93.301\(c\)](#), new construction activities include housing newly constructed and the acquisition of existing housing that was newly constructed less than 12 months before the commitment of HTF funds. A project that involves reconstruction in accordance with [24 CFR 93.2](#) is considered new construction for the purposes of property standards.

<input type="checkbox"/> Not Applicable- grantee or subgrantee does not have new construction rental projects

65.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p>Does the project file include records (e.g., inspection reports) that demonstrate that the <i>project</i> met the applicable requirements from the property standards in 24 CFR 93.301 (e.g., state and local codes, ordinances, and zoning requirements)?</p> <p>NOTE: New construction projects must comply with:</p> <ul style="list-style-type: none"> a. All applicable state and local residential and building codes, or in the absence of such codes, the International Residential Code, or International Building Code of the International Code Council? b. Accessibility requirements of 24 CFR part 8 and design and construction requirements of 24 CFR 100.201 c. Energy efficiency requirements pursuant to section 109 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C 12709. There has been a change in the required energy efficiency standards for new construction projects. On April 26, 2024, HUD published the final energy standard determination in the Federal Register and adopted the 2021 IECC for HTF-assisted single family homes and multifamily low-rise building (up to 3 stories) and ASHRAE 90.1-2019 for HTF-assisted multifamily housing with 4 or more stories as the minimum energy standards. The compliance date for this requirement varies by Federal program. HTF-assisted projects must comply with the updated energy standards beginning November 28, 2024, however, if HTF funds are
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Exhibit 15-4
Housing Trust Fund

	<p>combined with other HUD funding sources with a later compliance date, the later compliance date applies. Check the date of the written agreement to determine which energy efficiency standards apply (2009 IECC or 2021 IECC and ASHRAE 90.1-2019).</p> <p>[24 CFR 93.407(a)(2)(iv), 24 CFR 93.301(a), 24 CFR 93.101(d) for subgrantee]</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

66.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Did the project meet the energy efficiency standards of 24 CFR 93.301(a)(2)(ii) upon project completion?</p> <p>NOTE: There has been a change in the required energy efficiency standards for new construction projects. On April 26, 2024, HUD published the final energy standard determination in the Federal Register and adopted the 2021 IECC for HTF-assisted single family homes and multifamily low-rise building (up to 3 stories) and ASHRAE 90.1-2019 for HTF-assisted multifamily housing with 4 or more stories as the minimum energy standards. The compliance date for this requirement varies by Federal program. HTF-assisted projects must comply with the updated energy standards beginning November 28, 2024, however, if HTF funds are combined with another HUD funding source with a later compliance date, the later compliance date applies. Check the date of the written agreement to determine which energy efficiency standards apply (2009 IECC or 2021 IECC and ASHRAE 90.1-2019).</p> <p>The energy efficiency standards that apply are based on the standards that are in effect at the time of the HTF commitment. For projects for which the grantee/subgrantee committed HTF funds:</p> <ul style="list-style-type: none"> • Before November 28, 2024, the project must meet the energy efficiency standards of 2009 IECC • On or after November 28, 2024, the project must meet the energy efficiency standards of 2021 IECC and ASHRAE 90.1-2019, as applicable. <p>[24 CFR 93.404(c)(2)(v), 24 CFR 93.301(a), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

67.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee ensure the construction contract(s) and documents adequately describe the work to be performed in adequate detail so that inspections can be conducted? [24 CFR 93.301(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

68.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct progress inspections during development to ensure work is done in accordance with applicable codes, the construction contract and construction documents? [24 CFR 93.301(a)(2)(v), 24 CFR 93.101(d) for subgrantee]		
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Inspection Date(s):</i> Click or tap here to enter text.
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Inspection Date(s):</i> Click or tap here to enter text.
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Inspection Date(s):</i> Click or tap here to enter text.
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Inspection Date(s):</i> Click or tap here to enter text.
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Inspection Date(s):</i> Click or tap here to enter text.
Describe Basis for Conclusion: Click or tap here to enter text.			

Exhibit 15-4
Housing Trust Fund

69.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct a final inspection of construction of the project? [24 CFR 93.301(a)(2)(v), 24 CFR 93.101(d) for subgrantee]		
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Final Inspection Date:</i> Click or tap here to enter text.
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Final Inspection Date:</i> Click or tap here to enter text.
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Final Inspection Date:</i> Click or tap here to enter text.
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Final Inspection Date:</i> Click or tap here to enter text.
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>Final Inspection Date:</i> Click or tap here to enter text.
Describe Basis for Conclusion: Click or tap here to enter text.			

70.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Does the project file include records that the grantee/subgrantee inspected the property at project completion to determine if the property met the grantee’s property standards? [24 CFR 93.407(a)(2)(iv), 24 CFR 404.(d)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

New Construction - Broadband Infrastructure

71.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were committed to the project after January 19, 2017, and the project involves new construction of a building with more than 4 rental units, did the construction include the installation of broadband infrastructure, as defined in 24 CFR 5.100 (unless the grantee/subgrantee determined and documented that the installation of broadband infrastructure was infeasible, or cost of installation resulted in a fundamental alteration in the nature of the program or activity, or in an undue financial burden)?</i></p> <p>[24 CFR 93.301(a)(2)(vi), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

72.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were committed to the project after January 19, 2017, and the newly constructed project did not include broadband infrastructure, did the grantee/subgrantee determine and document one of the following, in accordance with 24 CFR 93.407(a)(2)(iv), that:</i></p> <ul style="list-style-type: none"> • Location of the project makes installation of broadband infrastructure infeasible, or • Cost of installing broadband infrastructure would result in a fundamental alteration of the grantee/subgrantee’s program or activity, or in an undue financial burden? <p>Indicate the basis of the grantee/subgrantee’s determination for each file.</p> <p>[24 CFR 93.301(a)(2)(iv), 24 CFR 93.407(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]</p>		
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>			

Exhibit 15-4
Housing Trust Fund

New Construction- Manufactured Housing

73.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were used for the construction of manufactured housing (including manufactured housing that replaces an existing substandard unit under the definition of “reconstruction”), did the housing meet the Manufactured Home Construction and Safety Standards in 24 CFR Part 3280?</i></p> <p>[24 CFR 93.301(d), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

74.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were used for manufactured housing (including manufactured housing that replaces an existing substandard unit under the definition of “reconstruction”), did the housing comply with applicable state and local codes?</i></p> <p>[24 CFR 93.301(d), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

75.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were used for manufactured housing (including manufactured housing that replaces an existing substandard unit under the definition of “reconstruction”), does the housing meet the following requirements:</i></p> <p>[24 CFR 93.301(d), 24 CFR 93.101(d) for subgrantee]</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		<p>File #1:</p>	<p>File #2:</p>	<p>File #3:</p>	<p>File #4:</p>	<p>File #5:</p>
	<p>a. The housing is located on a permanent foundation as defined in 24 CFR 203.43(f)(c)(i)?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>b. The housing is connected to permanent utility hook-ups.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>c. The housing is located on land that is owned by the manufactured housing unit owner or land for which the manufactured housing owner has a lease for at least 30 years?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

Rehabilitation – Property Standards

Instruction: For rehabilitation activities, the monitor should complete this section as well as Environmental Requirements and Broadband Infrastructure, if applicable.

In accordance with [24 CFR 93.301\(b\)](#), the grantee/subgrantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes.

Not Applicable- grantee or subgrantee did not use HTF funds for rehabilitation of rental housing

76.

Is the grantee/subgrantee using the rehabilitation standards approved with the applicable HTF allocation plan(s) associated with the project under review?	
[24 CFR 93.301(b) , 24 CFR 93.101(d) for subgrantee , 24 CFR 91.220(l)(5)(i)(D) for subgrantee , 24 CFR 91.320(k)(5)(iv) for grantee]	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

77.

Does the grantee/subgrantee’s written rehabilitation standards sufficiently detail the methods, materials, and requirements that the housing must meet upon project completion?	<input type="checkbox"/> Yes <input type="checkbox"/> No
NOTE: The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes.	
[24 CFR 93.301(b)(1) , 24 CFR 93.101(d) for subgrantee , 24 CFR 91.220(l)(5)(i)(D) for subgrantee , 24 CFR 91.320(k)(5)(iv) for grantee]	
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

78.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the grantee/subgrantee’s written rehabilitation standards address the following:</p>					
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		File #1:	File #2:	File #3:	File #4:	File #5:
	<p>a. Health and safety? [24 CFR 93.301(b)(1)(i), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>b. Major systems? [24 CFR 93.301(b)(1)(ii), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>c. Lead-based paint? [24 CFR 93.301(b)(1)(iii), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>d. Accessibility? [24 CFR 93.301(b)(1)(iv), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>e. Disaster mitigation, if relevant? [24 CFR 93.301(b)(1)(vi), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>f. State and local codes, ordinances, and zoning requirements? [24 CFR 93.301(b)(1)(vii), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>g. Capital needs assessment? [24 CFR 93.301(b)(1)(ix), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>h. Broadband infrastructure? [24 CFR 93.301(b)(1)(x), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Exhibit 15-4
Housing Trust Fund

	<p>i. Housing Standards - Correction of the specific deficiencies published in the Federal Register for HTF-assisted units? [24 CFR 93.301(b)(1)(viii), 24 CFR 93.101(d) for subgrantee]</p> <p>NOTE: There has been a change in the required housing standards (UPCS vs. NSPIRE) for projects involving rehabilitation (including manufactured housing) or acquisition of rental housing. Check the date of the written agreement to determine which housing standards apply (UPCS or NSPIRE).</p> <p>The housing standards that apply are based on the housing standards that are in effect at the time of the HTF commitment. For projects for which the grantee/subgrantee committed HTF funds:</p> <ul style="list-style-type: none"> • Before October 1, 2025, the grantee/subgrantee’s rehabilitation standards must ensure that upon project completion, units will be decent, safe, sanitary, and in good repair as described in 24 CFR 5.703, Uniform Physical Condition Standards (UPCS). • On or after October 1, 2025, the grantee/subgrantee’s rehabilitation standards must require that upon project completion, units will be decent, safe, sanitary and in good repair and meet the standards in 24 CFR 5.703, The National Standards for the Physical Inspection of Real Estate (NSPIRE). The carbon monoxide detection requirement at 24 CFR 5.703(b)(2) and (d)(6) and the requirements at 24 CFR 5.705–5.713 do not apply to HTF-assisted projects. At minimum, the grantee’s rehabilitation standards must require correction of the specific deficiencies published in the Federal Register for HTF-assisted projects and units. For SRO housing, the requirements at 24 CFR 5.703(d) shall only apply to the extent that the SRO unit contains the room or facility referenced in 24 CFR 5.703(d) 	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

79.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Did the grantee/subgrantee comply with the grantee’s written rehabilitation standards on lead-based paint?</p> <p>NOTE: To answer this question, the reviewer must complete (as applicable):</p> <ul style="list-style-type: none"> • Exhibit 24-1- <i>Guide for Review of Lead-Based Paint Compliance in Properties Receiving Federal Rehabilitation Assistance.</i> • If the project also received HTF funded operating cost assistance & operating cost assistance reserves, the reviewer must complete Exhibit 24-2- <i>Guide for Review of Lead-Based Paint Compliance in Properties Receiving Acquisition, Leasing, Supportive Services, or Operations Assistance.</i> <p>[24 CFR 93.301(b)(1)(iii), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

80.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>For projects with less than 26 total units</i>, did the grantee/subgrantee estimate (based on age and condition) the remaining useful life of each major system upon project completion?</p> <p>[24 CFR 93.301(b)(1)(ii), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

81.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the project consists of 26 or more total units</i> , do the grantee/subgrantee’s standards require that the grantee determine the useful life of major systems through a capital needs assessment? [24 CFR 93.301(b)(1)(ii), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

82.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	<i>If the remaining useful life a major system is less than the 30-year period of affordability</i> , did the grantee/subgrantee’s standards require the grantee to ensure that a replacement reserve was established, and monthly payments are made to the reserve that are adequate to repair or replace the system(s) as needed? [24 CFR 93.301(b)(1)(ii), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

83.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Were the construction documents in sufficient detail to establish the basis for a uniform inspection of the housing to determine compliance with the grantee/subgrantee’s rehabilitation standards? [24 CFR 93.301(b)(2), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

84.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee review and approve a written cost estimate for rehabilitation after determining that costs were reasonable? [24 CFR 93.301(b)(2), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

85.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct an initial property inspection to identify the deficiencies that must be addressed during the rehabilitation? [24 CFR 93.301(b)(3), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

86.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct progress inspections to determine work was done in accordance with work write-ups? [24 CFR 93.301(b)(3), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

87.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct a final inspection of the work? [24 CFR 93.301(b)(3) and 24 CFR 93.404(d)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

88.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee conduct an onsite inspection of the project at project completion to determine if the property met the grantee/subgrantee's rehabilitation standards under 24 CFR 93.301(b)? [24 CFR 93.404(d)(1), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.		

89.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Does the project file include records (e.g., inspection reports) demonstrating that the project met the grantee/subgrantee's rehabilitation standards at project completion? [24 CFR 93.407(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

90.

Does the project owner annually certify to the grantee/subgrantee that each HTF-assisted building in the project is suitable for occupancy, taking into account State and local health, safety, and other applicable codes, ordinances, and requirements, and the ongoing property standards established by the grantee/subgrantee to meet the requirements of [24 CFR 93.301](#)?

NOTE: There has been a change in the required housing standards (UPCS vs. NSPIRE) for rental projects. Check the date of the written agreement to determine which housing standards apply (UPCS or NSPIRE).

The owner’s certification must address the applicable ongoing property standards established by the grantee/subgrantee pursuant [24 CFR 93.301\(e\)](#) and in effect at the time of the HTF commitment. For projects for which the grantee/subgrantee committed HTF funds:

- Before October 1, 2025, the project owner’s certification that housing is suitable for occupancy must address all inspectable items and inspectable areas specified by HUD based on the HUD physical inspection procedures (UPCS) prescribed by HUD pursuant to [24 CFR 5.705](#).
- On or after October 1, 2025, the project owner’s certification that housing is suitable for occupancy must address the requirement that the property does not contain the specific deficiencies established by HUD based on the applicable standards in [24 CFR 5.703](#) (NSPIRE) and published in the **Federal Register** for rental housing (including manufactured housing). The requirements in [24 CFR 5.705-5.713](#) do not apply to the grantee/subgrantee's ongoing property standards.

[\[24 CFR 93.404\(d\)\(2\)\(iv\), 24 CFR 93.101\(d\) for subgrantee\]](#)

File	Enter date of written agreement	
#1:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#2:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#3:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#4:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
#5:	Click or tap to enter a date.	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

Rehabilitation - Broadband Infrastructure

91.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If HTF funds were committed to a project after January 19, 2017, that involves substantial rehabilitation, as defined in 24 CFR 5.100, of a building with more than 4 rental units, did the rehabilitation include the installation of broadband infrastructure, as defined in 24 CFR 5.100 (unless the grantee/subgrantee determined and documented that the location of substantial rehabilitation makes installation of broadband infrastructure infeasible, the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity, or in an undue financial burden, or the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible)?</i></p> <p>[24 CFR 93.301(b)(1)(x), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

92.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If the HTF funds were committed to the project after January 19, 2017, and the project involving substantial rehabilitation, as defined in 24 CFR 5.100, did not include broadband infrastructure, did the grantee/subgrantee determine and document one of the following, in accordance with 24 CFR 93.407(a)(2)(iv), that:</i></p> <ul style="list-style-type: none"> • the location of substantial rehabilitation makes installation of broadband infrastructure infeasible, • the cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity, or in an undue financial burden, or • the structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible? <p>Indicate the basis of the grantee/subgrantee’s determination for each file.</p> <p>[24 CFR 93.301(b)(1)(x), 24 CFR 93.407(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]</p>		
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	Click or tap here to enter text.
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>			

Exhibit 15-4
Housing Trust Fund

Acquisition of Standard Housing

In accordance with [24 CFR 93.301\(c\)](#), the acquisition of existing rental housing (including manufactured housing) that was newly constructed or rehabilitated less than 12 months before the date of commitment of HTF funds, must meet the property standards for new construction at [24 CFR 93.301\(a\)](#) or the grantee/subgrantee’s rehabilitation standards at [24 CFR 93.301\(b\)](#), as applicable.

Not Applicable- grantee or subgrantee did not use HTF funds for the acquisition of existing housing.

93.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used for the acquisition of existing rental housing that was newly constructed or rehabilitated within 12 months of the date of commitment, did the grantee/subgrantee determine the housing met the applicable property standards of 24 CFR 93.301(a) (new construction) or (b) (rehabilitation)?</i></p> <p>NOTE: The grantee must have documented compliance with this requirement based upon a review of approved building plans and Certificates of Occupancy, and an inspection that is conducted no earlier than 90 calendar days before the date of commitment of HTF assistance.</p> <p>[24 CFR 93.301(c)(1), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

94.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p>[24 CFR 93.404(a)]</p>	<p><i>If HTF funds were used for the acquisition of existing rental housing that was <u>NOT newly constructed or rehabilitated within the past 12 months of the date of commitment</u>, did the grantee/subgrantee determine the housing met grantee/subgrantee’s rehabilitation standards of 24 CFR 93.301(b) by inspecting the property no earlier than 90 days before the commitment of HTF funds?</i></p> <p>NOTE: If the property did not meet the standards in 24 CFR 93.301(b), the property cannot be acquired with HTF funds unless it is rehabilitated to meet 24 CFR 93.301(b).</p> <p>[24 CFR 93.301(c)(2), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

J. ENVIRONMENTAL REQUIREMENTS

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

95.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Does the project file contain documents demonstrating compliance with the environmental requirements in accordance with 24 CFR 93.301(f)? <i>New construction</i> activities include new construction of manufactured housing or acquisition of existing housing that was newly constructed less than 12 months before the commitment of HTF funds. <i>Rehabilitation</i> activities include rehabilitation of manufactured housing and acquisition of existing housing that was rehabilitated less than 12 months before the commitment of HTF funds. <i>Existing housing</i> that was acquired with HTF funds that was newly constructed or rehabilitated less than 12 months before the date of commitment of HTF funds must meet the environment requirements in 24 CFR 93.301(f)(1) . All other housing that is acquired with HTF funds must meet the environmental requirements of 24 CFR 93.301(f)(2) . NOTE: If the file does not include environmental compliance records the monitor must refer the project to the HUD Field Office Environmental Officer for further evaluation and consideration to include the project in the next Environmental Risk Analysis. [24 CFR 93.407(a)(2)(iv) 24 CFR 93.301(f)(1) for new construction projects or 24 CFR 93.301(f)(2) for rehabilitation projects, 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Exhibit 15-4
Housing Trust Fund

K. DISPLACEMENT, RELOCATION, & ACQUISITION

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

Instructions: The following requirements are applicable to projects that involve acquisition, rehabilitation, or demolition of real property. If the project file does not include evidence of compliance with a requirement, the reviewer must refer the project to HUD’s Regional Relocation Specialist for further evaluation.

96.

<p>Does the grantee/subgrantee have policies and procedures that review projects for applicability of the Displacement, Relocation and Acquisition requirements of 24 CFR 93.352 and monitor for compliance?</p> <p>NOTE: Procedures should flag all activities that involve acquisition, rehabilitation, or demolition of real property as subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) and monitor them for compliance with 24 CFR 93.352 and 49 CFR part 24.</p> <p>[24 CFR 93.101(d) for subgrantee, 24 CFR 93.404(a)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>	

97.

<p>Were HTF funds used to acquire property?</p> <p>NOTE: If the project file <u>includes</u> records that demonstrate the property was acquired through either a voluntary acquisition or eminent domain, the monitor must refer the project to the HUD’s Regional Relocation Specialist for further evaluation.</p>	
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>	

Exhibit 15-4
Housing Trust Fund

98.

If the project involves acquisition, rehabilitation, or demolition of occupied real property, do project files demonstrate that all occupants were issued a general information notice (GIN) to demonstrate compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA) (49 CFR part 24), and HTF Displacement, Relocation and Acquisition requirements in [24 CFR 93.352](#)?

NOTE: If the project file does not include occupancy lists and GINs, the monitor must refer the project to HUD’s Regional Relocation Specialist for further evaluation.

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

99.

If tenants were moved temporarily or permanently from the project, do project files demonstrate that such persons were issued a Notice of Relocation Eligibility?

NOTE: If the project file does not include evidence of compliance, the monitor must refer the project to HUD’s Regional Relocation Specialist for further evaluation. It is recommended that all projects requiring occupants to move temporarily or permanently from the project be referred to the HUD Regional Relocation Specialist for further evaluation.

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

100.

If tenants were moved temporarily or permanently from the project, do project files demonstrate that such persons were issued a 90-day Notice before the persons were required to move?

NOTE: If the project file does not include evidence of compliance, the monitor must refer the project to HUD’s Regional Relocation Specialist for further evaluation. It is recommended that all projects requiring occupants to move temporarily or permanently from the project be referred to the HUD Regional Relocation Specialist for further evaluation.

File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Describe Basis for Conclusion:
Click or tap here to enter text.

L. AFFORDABILITY REQUIREMENTS

Check the requirement or program area reviewed:

Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.

Policies and Procedures requirements- monitoring is focusing *only* on policies and procedures.

Program area not reviewed. Provide justification: Click or tap here to enter text.

Affordability Restrictions

101.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Did the grantee/subgrantee impose at least a 30-year period of affordability, beginning after project completion? [24 CFR 93.302(d), 24 CFR 93.101(d) for subgrantee]
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4: <input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5: <input type="checkbox"/> Yes <input type="checkbox"/> No

Describe Basis for Conclusion:
Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

102.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Was the affordability period imposed using a deed restriction, covenant running with the land, use restriction, or other mechanism approved by HUD under which the grantee and beneficiaries have the right to require specific performance? [24 CFR 93.302(d)(2), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Unit Designation

103.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]	Were the specific HTF-assisted units identified no later than the time of project completion? [24 CFR 93.302(g), 24 CFR 93.101(d) for subgrantee]	
<input type="checkbox"/> Yes <input type="checkbox"/> No	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Rent Compliance

104.

Did the grantee/subgrantee establish maximum monthly allowances for utilities and services (excluding telephone, television, and internet service)? [24 CFR 93.302(c)(1), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

105.

Did the grantee/subgrantee review and approve the initial project rents? [24 CFR 93.302(c)(2), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

106.

<i>For all units for which the tenant is paying utilities,</i> did the grantee/subgrantee require that the rents do not exceed the maximum rent minus the monthly allowances for utilities? [24 CFR 93.302(c)(2), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

107.

Does the project file include records demonstrating that each HTF-assisted unit in the project meets the rent requirements of 24 CFR 93.302(b) and (c) ? [24 CFR 93.407(a)(2)(vi) 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

Lease Requirements

108.

Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)] <input type="checkbox"/> Yes <input type="checkbox"/> No	Is the tenant’s lease free of the following prohibited lease terms: [24 CFR 93.303(b)(1)-(b)(9), 24 CFR 93.101(d) for subgrantee]					
		File #1:	File #2:	File #3:	File #4:	File #5:
	a. Agreement by the tenant to be sued, to admit guilt, or to a judgment in favor of the owner in a lawsuit brought in connection with the lease?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	b. Agreement by the tenant that the owner may take, hold, or sell personal property of household members without notice to the tenant and a court decision on the rights of the parties? NOTE: This prohibition does not apply to an agreement by the tenant concerning disposition of personal property remaining in the housing unit after the tenant has moved out of the unit. The owner may dispose of this personal property in accordance with State law.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	c. Agreement by the tenant not to hold the owner or the owner's agents legally responsible for any action or failure to act, whether intentional or negligent?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	d. Agreement by the tenant that the owner may institute a lawsuit without notice to the tenant?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	e. Agreement by the tenant that the owner may evict the tenant or household members without instituting a civil court proceeding in which the tenant has the opportunity to present a defense, or before a court decision on the rights of the parties?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	f. Agreement by the tenant to waive any right to a trial by jury?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	g. Agreement by the tenant to waive the tenant's right to appeal, or to otherwise challenge in court, a court decision in connection with the lease?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Exhibit 15-4
Housing Trust Fund

	<p>h. Agreement by the tenant to pay attorney's fees or other legal costs even if the tenant wins in a court proceeding by the owner against the tenant?</p> <p>NOTE: The tenant may be obligated to pay costs if the tenant loses.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<p>i. Agreement by the tenant to accept mandatory supportive services that are offered?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>						

Exhibit 15-4
Housing Trust Fund

109.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If the date of the HTF funding commitment for the project was after December 16, 2016</i>, did the grantee develop a VAWA lease addendum to incorporate all requirements that apply to the owner or lease of HTF-assisted rental housing under 24 CFR part 5, subpart L and 93.356? [24 CFR 93.303(a) and (d)(7), 24 CFR 93.101(d) for subgrantee][24 CFR 93.303(a) and (d)(7), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #3:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #4:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Tenant Selection

110.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the project owner adopt and follow written tenant selection policies and criteria that:</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Limit housing to income eligible families? [24 CFR 93.303(d)(1), 24 CFR 93.101(d) for subgrantee]</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Are reasonably related to the applicant's ability to perform the obligations of the lease? [24 CFR 93.303(d)(2), 24 CFR 93.101(d) for subgrantee]</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p><i>If permitted in its written agreement with the grantee/subgrantee (and only if described in the grantee/subgrantee's consolidated plan)</i>, limit eligibility or gives a preference to a particular population in accordance with 24 CFR 93.303(d)(3)? NOTE: No preference can be given to students in accordance with 24 CFR 91.320(k)(5) and 24 CFR 91.220(l)(5). If there is such a preference, the reviewer must issue a finding of noncompliance with these requirements at 24 CFR part 91. [24 CFR 93.303(d)(3), 24 CFR 93.101(d) for subgrantee]</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
	<p>Does not exclude an applicant because the applicant is a holder of a voucher under the Section 8 Housing</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Exhibit 15-4
Housing Trust Fund

	Choice Voucher program, or receiving HOME TBRA assistance because of the status of the prospective tenant as a holder of such voucher or beneficiary of HOME TBRA? [24 CFR 93.303(d)(4), 24 CFR 93.101(d) for subgrantee]	
	Provides for the selection of tenants from a written waiting list in the chronological order of their application insofar as is practicable? [24 CFR 93.303(d)(5), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Gives applicants prompt written notification of rejection and the reason for rejection? [24 CFR 93.303(d)(6), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Complies with the VAWA requirements prescribed in 24 CFR 93.356? [24 CFR 93.303(d)(7), 24 CFR 93.101(d) for subgrantee]	<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe Basis for Conclusion: Click or tap here to enter text.		

Affirmative Marketing

111.

<p><i>If the project contains five (5) or more HTF-assisted units, did the project owner comply with the affirmative marketing requirements established by the grantee/subgrantee pursuant to 24 CFR 93.350?</i></p> <p>[24 CFR 93.303(d), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: Click or tap here to enter text.	

Exhibit 15-4
Housing Trust Fund

112.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Does the project file include records that document <i>all</i> the following:</p>									
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>						File #1:	File #2:	File #3:	File #4:	File #5:
	<p>a. Period of affordability imposed on the project? [24 CFR 93.407(a)(2)(vi), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No				
	<p>b. Project met initial rent requirements? [24 CFR 93.407(a)(2)(vi), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No				
	<p>c. Recorded deed restriction, covenant running with the land or use restriction for affordability? [24 CFR 93.407(a)(2)(vi), 24 CFR 93.101(d) for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No				
	<p>d. Leases does not include prohibited provisions? [24 CFR 93.407(a)(2)(vii)] 24 CFR 93.101(d) for subgrantee</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No				
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>										

Exhibit 15-4
Housing Trust Fund

M. PROCUREMENT AND CONTRACTOR OVERSIGHT

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

Instructions: If the grantee/subgrantee procured the services of a contractor to administer its rental development program, the grantee/subgrantee must have complied with the procurement requirements of [2 CFR part 200](#). The HTF regulations at [24 CFR 93.404\(b\)](#) require that before disbursing any HTF funds to any entity, the grantee/subgrantee must enter into a written agreement with that entity. If reviewing this program area, reviewers must complete [Exhibit 34-3a, Guide for Review of Procurement](#).

113.

<p><i>If the grantee/subgrantee procured the services of a contractor to administer its rental compliance functions, did the grantee/subgrantee adhere to the procurement requirements of 2 CFR part 200?</i></p> <p>Summarize the results of Exhibit 34-3(a): Guide for Review of Procurement to answer this question. [24 CFR 93.405, 24 CFR 93.101(d) for subgrantee; 2 CFR 200.317 for States and 2 CFR 200.318 for subgrantee]</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>Describe Basis for Conclusions: Click or tap here to enter text.</p>	

N. PROJECT COMPLETION

Check the requirement or program area reviewed:
<input type="checkbox"/> Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.
<input type="checkbox"/> Policies and Procedures requirements- monitoring is focusing <i>only</i> on policies and procedures.
<input type="checkbox"/> Program area not reviewed. Provide justification: Click or tap here to enter text.

Exhibit 15-4
Housing Trust Fund

114.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Was all project completion information entered into IDIS, or otherwise provided, within 120 calendar days of the date of the final project drawdown?</p> <p>A grantee/subgrantee is required to complete all the applicable fields in IDIS based on the HTF activity and tenure type, including total units and leverage funds. The data entered into IDIS (e.g., project address, number of units, beneficiary information) must accurately reflect the data included in the written agreement and project files.</p> <p>NOTE: Project completion for rental housing occurs upon completion of construction before occupancy. This means that a project may be completed in IDIS prior to lease up. The grantee/subgrantee must enter all beneficiary data within a reasonable timeframe.</p> <p>[24 CFR 93.2 Definition of project completion, and 24 CFR 93.402(d)(1), 24 CFR 93.101(d) for subgrantee]</p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>File #1:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #2:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #3:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #4:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #5:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Describe Basis for Conclusion: Click or tap here to enter text.</p>		

Exhibit 15-4
Housing Trust Fund

O. RECORD RETENTION

Check the requirement or program area reviewed:

Project requirements- monitoring is focusing on project requirements. Reviewed policies and procedures for requirement(s) where non-compliance was found.

Policies and Procedures requirements- monitoring is focusing *only* on policies and procedures.

Program area not reviewed. Provide justification: Click or tap here to enter text.

115.

Is the grantee/subgrantee retaining rental project records (except for records of individual tenant income verifications, rents, and inspections) in a secure location for five years after project completion?

Yes No

NOTE: Income verification records are required as soon as the units are occupied by income eligible families.

[\[24 CFR 93.407\(b\)\(1\), 24 CFR 93.101\(d\) for subgrantee\]](#)

Describe Basis for Conclusion:

Click or tap here to enter text.

116.

Is the grantee/subgrantee retaining individual tenant income verifications, project rents and inspection records for the most recent five-year period?

Yes No

NOTE: Income verification records are required as soon as the units are occupied by income eligible families.

[\[24 CFR 93.407\(b\)\(1\), 24 CFR 93.101\(d\) for subgrantee\]](#)

Describe Basis for Conclusion:

Click or tap here to enter text.

117.

Does the grantee/subgrantee have a record retention policy that rental project written agreements records be retained for five years after the agreement terminates?

Yes No

[\[24 CFR 93.407\(b\)\(3\), 24 CFR 93.404\(a\), 24 CFR 93.101\(d\) for subgrantee\]](#)

Describe Basis for Conclusion:

Click or tap here to enter text.