

Exhibit 15-5  
Housing Trust Fund

<b>Guide for Review of Rental Project Compliance and/or Policies &amp; Procedures</b>	
<b>Grantee:</b> Click or tap here to enter text.	<b>Subgrantee:</b> Click or tap here to enter text.
<b>Grantee/subgrantee Staff Consulted:</b> Click or tap here to enter text.	
<b>Project Owner:</b> Click or tap here to enter text.	<b>Project Address:</b> Click or tap here to enter text.
<b>Period of Affordability:</b> Click or tap here to enter text.	<b>Number of HTF-assisted Units:</b> Click or tap here to enter text. <b>Fixed or Floating:</b> <input type="checkbox"/> Fixed <input type="checkbox"/> Floating
<b>Name of HUD Reviewer(s):</b> Click or tap here to enter text.	<b>Date of Review:</b> Click or tap here to enter text.
<b>Type of Monitoring Review:</b>	<input type="checkbox"/> Project File Review <input type="checkbox"/> Policies & Procedures Review <input type="checkbox"/> Combined: Project and Policies & Procedures Review

**NOTE:** All questions contain the citation for the source of the requirement (statute, regulation, NOFO, HTF allocation plan or grant agreement). Questions with multiple parts address requirements from the specific citation(s) in the lead-in question, unless there is a specific citation with the subpart question. If the requirement is not met (i.e., the answer to the question is “no”), the reviewer must make a finding of noncompliance.

<b>File Selection Summary- (Required)</b>	
<b>Allocation Plan year(s) reviewed:</b>	Click or tap here to enter text.
<b>Number of files reviewed:</b>	Click or tap here to enter text.
<b>How were files selected?</b>	<input type="checkbox"/> Random <input type="checkbox"/> Non-Random <input type="checkbox"/> Statistical <input type="checkbox"/> Combination (describe): Click or tap here to enter text.
<b>Were additional files selected for review?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>If additional files were selected for review, why were files added to the monitoring?</b> (select all that apply)	<input type="checkbox"/> Expand the sample to include a file(s) from <u>each</u> staff person working in the respective program area being monitored. <input type="checkbox"/> Expand the sample to include additional files with the <u>same</u> characteristics, (i.e., same problem category, staff person, activities, or other characteristics). <input type="checkbox"/> Expand the sample to determine whether problems are isolated events or represent a systemic problem. <input type="checkbox"/> Expand the sample to include files the reviewer has reason to believe may have compliance problems or that are substantially different in terms of size, complexity, or other factors from other projects the grantee/subgrantee has undertaken. <input type="checkbox"/> Other, please specify: Click or tap here to enter text.

Exhibits 15-5  
Housing Trust Fund

TABLE OF CONTENTS

Purpose.....	3
Instructions.....	3
Program Areas To Review.....	4
File Selection Summary Table.....	5
A. Affirmative Marketing .....	6
B. Tenant Selection .....	6
C. Income Requirements.....	7
D. Lease requirements.....	15
E. Rent Compliance .....	20
F. Floating units.....	22
G. Property Standards .....	23
H. Financial Oversight .....	28
I. Eligible Costs .....	29
J. Audit.....	31
K. Procurement And Contractor Oversight.....	34
L. Project Completion.....	35
M. Record Retention.....	35

Exhibits 15-5  
Housing Trust Fund

## 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 completed HTF-assisted rental projects for compliance with ongoing HTF rental requirements during the period of affordability.** The reviewer can use this Exhibit to monitor a grantee/subgrantee's:

- rental project files,
- rental program policies and procedures, or
- a combination of both project files and policies and procedures.

The questions in this Exhibit may also be used as an interview instrument for program staff. The reviewer should use Exhibit-15-4, *Guide for Review of Rental Project Development or Rehabilitation Projects and/or Policies and Procedures*, to monitor HTF-assisted rental projects from development through project completion.

## 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 15-4) 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 is not addressing 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 review 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 “Not Reviewed” box at the beginning of each program area and note the reason why.
- Reviewers should use one Exhibit for each project monitored and the Exhibit provides for the review of up to ten (10) HTF-assisted units in a project. 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.
- Complete other Exhibits, as applicable:
  - ✓ *Chapter 34: Exhibit 34-3a, Guide for Review of Procurement for question #50*

Reviewers must address the following:

- Complete the **File Selection Summary Table** (page 15-5)

Exhibits 15-5  
Housing Trust Fund

**PROGRAM AREAS TO REVIEW**

Instructions: Check the program areas reviewed during monitoring:

- A.  Affirmative Marketing
- B.  Tenant Selection;
- C.  Income Requirements;
- D.  Lease Requirements;
- E.  Rent Compliance;
- F.  Floating Units;
- G.  Property Standards;
- H.  Financial Oversight
- I.  Eligible Costs;
- J.  Audit;
- K.  Procurement and Contractor Oversight;
- L.  Project Completion;
- M.  Record Retention;

Exhibits 15-5  
Housing Trust Fund

**FILE SELECTION SUMMARY TABLE**

Include the following information for each tenant/unit file reviewed. When completing the Exhibit questions that follow, include only the file or unit number as a reference to the tenant/unit file reviewed.

<b>File#</b>	<b>Unit Number<sup>1</sup></b>	<b>Bedroom Size</b>	<b>Contract/Lease Rent</b>	<b>HTF Rent Limit (ELI, VLI, Project-based)</b>	<b>Tenant Income</b>	<b>Date of Lease</b>
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 to enter a date.
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 to enter a date.
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 to enter a date.
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 to enter a date.
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 to enter a date.
6.	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.
7.	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.
8.	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.
9.	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.
10.	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.

<sup>1</sup> 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.

Exhibit 15-5  
Housing Trust Fund

**A. AFFIRMATIVE MARKETING**

<b>Check the requirement or program area reviewed:</b>
<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.

1.

<p><i>If the project contains five (5) or more HTF-assisted units</i>, did the project owner comply with the affirmative marketing requirements established by the grantee/subgrantee pursuant to 24 CFR 93.350?</p> <p><b>NOTE:</b> If monitoring for compliance with affirmative marketing, recordkeeping and data compilation requirements, use <a href="#">Exhibit 22-8 Guide for Review of Civil Rights-Related Program Requirements for the HTF Program</a>.</p> <p><a href="#">[24 CFR 93.303(d), 24 CFR 93.101(d)]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

**B. TENANT SELECTION**

<b>Check the requirement or program area reviewed:</b>
<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.

2.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Does the project owner adopt and follow written tenant selection policies and criteria that:	
<input type="checkbox"/> Yes <input type="checkbox"/> No	Limit housing to income eligible families? <a href="#">[24 CFR 93.303(d)(1), 24 CFR 93.101(d) for subgrantee]</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Are reasonably related to the applicant’s ability to perform the obligations of the lease? <a href="#">[24 CFR 93.303(d)(2), 24 CFR 93.101(d) for subgrantee]</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<i>If permitted in its written agreement with the grantee/subgrantee (and only if described in the</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

Exhibit 15-5  
Housing Trust Fund

	<p><i>grantee/subgrantee's consolidated plan</i>), limit eligibility or gives a preference to a particular population in accordance with <a href="#">24 CFR 93.303(d)(3)</a>?</p> <p><b>NOTE:</b> No preference can be given to students in accordance with <a href="#">24 CFR 91.320(k)(5)</a> and <a href="#">24 CFR 91.220(l)(5)</a>. If there is such a preference, the reviewer must issue a finding of noncompliance with these requirements at 24 CFR part 91. <a href="#">[24 CFR 93.303(d)(3), 24 CFR 93.101(d) for subgrantee]</a></p>	
	<p>Does not exclude an applicant because the applicant is a holder of a voucher under the Section 8 Housing 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? <a href="#">[24 CFR 93.303(d)(4), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Provides for the selection of tenants from a written waiting list in the chronological order of their application insofar as is practicable? <a href="#">[24 CFR 93.303(d)(5), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Gives applicants prompt written notification of rejection and the reason for rejection? <a href="#">[24 CFR 93.303(d)(6), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Complies with the VAWA requirements prescribed in <a href="#">24 CFR 93.356</a>? <a href="#">[24 CFR 93.303(d)(7), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

**C. INCOME REQUIREMENTS**

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

Exhibit 15-5  
Housing Trust Fund

**Income Targeting**

3.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>Are the HTF-assisted units occupied by households who are eligible families in accordance with the income targeting requirements in <a href="#">24 CFR 93.250</a>? [<a href="#">24 CFR 93.302(a)</a>,<a href="#">24 CFR 93.101(d)</a> for subgrantee]</p> <p><b>NOTE:</b> <a href="#">24 CFR 93.250</a> identifies eligible families as follows:</p> <ul style="list-style-type: none"> <li>• In any fiscal year in which the total amount of HTF funds available for allocation is less than \$1 billion, then the grantee must use 100 percent of its grant for the benefit of extremely low-income (ELI) families or families with incomes at or below the poverty line (whichever is greater), and</li> <li>• In any fiscal year in which the total amount of HTF funds available for allocation exceeds \$1 billion, then the grantee must use at least 75 percent of its grant for the benefit of ELI families or families with incomes at or below the poverty line and any remaining funds may be used to benefit very low-income (VLI) families.</li> </ul> <p>2016-2024: The total amount of HTF funds available for allocation in each fiscal year has been less than \$1 billion, therefore, for these grant years, eligible families are extremely low-income families or families with incomes at or below the poverty line (whichever is greater).</p> <p>For grant years after 2024, the reviewer will need to check the amount of HTF funds allocated to determine the income requirement of eligible households. If the HTF funds available for allocation exceeds \$1 billion in a fiscal year, the reviewer must review the project’s income requirements in context of the entire grant and not just the project to determine compliance.</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>File #6:</p> <p>File #7:</p> <p>File #8:</p> <p>File #9:</p> <p>File #10:</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><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><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		



Exhibit 15-5  
Housing Trust Fund

**Income Determinations**

4.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Did the grantee/subgrantee determine that each family occupying an HTF-assisted unit is income-eligible by determining the family’s annual income in accordance with 24 CFR 93.151(a)? <a href="#">[24 CFR 93.151(a), 24 CFR 93.101(d) for subgrantee]</a>	
<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
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

Exhibit 15-5  
Housing Trust Fund

5.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>When determining whether a family was income-eligible, did the grantee/subgrantee use one of the following two definitions of annual income? [24 CFR 93.151(b), 24 CFR 93.101(d) for subgrantee]]</p> <p><i>Check definition of annual income used in this project:</i></p> <p><input type="checkbox"/> Annual income as defined in <a href="#">24 CFR 5.609(a)</a> and <a href="#">(b)</a>, or</p> <p><input type="checkbox"/> Adjusted gross income as defined under IRS Form 1040: Individual Income Tax Return</p> <p><b>NOTE:</b> Only one definition of annual income can be used for each rental housing project.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 70%;">File #1:</td><td style="width: 30%;"><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #2:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #3:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #4:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #5:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #6:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #7:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #8:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #9:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> <tr><td>File #10:</td><td><input type="checkbox"/> Yes <input type="checkbox"/> No</td></tr> </table>	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	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
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File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No																				
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>																					

Exhibit 15-5  
Housing Trust Fund

6.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Did the grantee/subgrantee calculate the annual income of the family by projecting the prevailing rate of income of the family at the time the grantee/subgrantee determined the family was income eligible? <a href="#">[24 CFR 93.151(e)(1), 24 CFR 93.101(d) for subgrantee]</a>	
<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
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

7.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Did the calculation of annual income include income from all persons in the household, except live-in aides, foster children, and foster adults? <a href="#">[24 CFR 93.151(e)(1), 24 CFR 93.101(d) for subgrantee]</a>	
<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
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

Exhibit 15-5  
Housing Trust Fund

**Initial Income Determination**

8.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [<a href="#">24 CFR 93.404(a)</a>]</p>	<p>Was the initial income determination of each tenant done in accordance with 24 CFR 93.151(d)(1), (i.e., examine at least 2 months of source documents evidencing annual income)?</p> <p>[24 CFR 93.151(c)(1) and <a href="#">24 CFR 93.301(e)</a>, <a href="#">24 CFR 93.101(d)</a> 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
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

**Annual Income Re-examination**

9.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p>With the exception of a tenant’s income examination in the tenant’s first year and every sixth year thereafter, did the project owner annually re-examine the tenant’s annual income in accordance with one of the options in 24 CFR 93.151(d) selected by the grantee/subgrantee?</p> <p><b>NOTE:</b> The grantee/subgrantee may select one of the following three methods as prescribed in <a href="#">24 CFR 93.151(d)</a> and specify in the written agreement:</p> <ul style="list-style-type: none"> <li>• Examine at least 2 months of source documentation evidencing annual income for the family;</li> <li>• Obtain from the family a written statement of the amount of the family’s annual income and family size, along with a certification that the information is complete and accurate; or</li> <li>• Obtain a written statement from the administrator of a government program under which the family receives benefits, and which examines each year the annual income of the family.</li> </ul> <p>[24 CFR 93.302(e)(1), 24 CFR 93.101(d) or 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>File #6:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #7:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #8:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #9:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>File #10:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

10.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>In projects where a tenant's income is reexamined using a statement and certification (e.g., self-certification), did the project owner examine the source documentation every 6<sup>th</sup> year of the affordability period to determine the annual income of the household?</i></p> <p>[24 CFR 93.302(e)(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
	File #2:	<input type="checkbox"/> Yes <input type="checkbox"/> No
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	File #5:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

11.

<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 demonstrate that the family was income-eligible at initial occupancy?</p> <p>[24 CFR 93.407(a)(2)(v), 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
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	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

12.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>Does the project file include records that demonstrate that the family was income-eligible at re-examination?</p> <p><b>NOTE:</b> HTF-assisted units continue to qualify as affordable housing despite a temporary noncompliance caused by increases in the incomes of existing tenants if actions satisfactory to HUD are being taken to ensure that all vacancies are filled in accordance with <a href="#">24 CFR 93.302(f)</a> until the noncompliance is corrected.</p> <p><a href="#">[24 CFR 93.407(a)(2)(v), 24 CFR 93.101(d) for subgrantee]</a></p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	File #1:	<input type="checkbox"/> Yes <input type="checkbox"/> No
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	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

**D. LEASE REQUIREMENTS**

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

Exhibit 15-5  
Housing Trust Fund

13.

Was the lease between the project owner and tenant for a period of not less than one year, unless by mutual agreement between the project owner and tenant a shorter period was specified?	
<a href="#">[24 CFR 93.303(a), 24 CFR 93.101(d) for subgrantee]</a>	
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
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File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.	



Exhibit 15-5  
Housing Trust Fund

14.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p><i>If the date of the HTF funding commitment for the project was after December 16, 2016, did the grantee/subgrantee develop a VAWA lease term/addendum to incorporate all requirements that apply to the owner or lease of HTF-assisted rental housing under 24 CFR part 5, subpart L, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). The VAWA lease term/addendum must also provide that the tenant may terminate the lease without penalty if the grantee determines that the tenant has met the conditions for an emergency transfer under 24 CFR 5.2005(e)?</i></p> <p><a href="#">[24 CFR 93.356(d), 24 CFR 93.101(d) for subgrantee]</a></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
	File #6:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #7:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #8:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

15.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>Is the tenant’s lease free of the following prohibited lease terms: <a href="#">[24 CFR 93.303(b)(1)-(b)(9), 24 CFR 93.101(d) for subgrantee]</a></p>																								
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<table border="1"> <thead> <tr> <th></th> <th>File #1:</th> <th>File #2:</th> <th>File #3:</th> <th>File #4:</th> <th>File #5:</th> </tr> </thead> </table>						File #1:	File #2:	File #3:	File #4:	File #5:														
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<p>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?  <a href="#">[24 CFR 93.303(b)(1)]</a></p>	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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<p>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?  <b>NOTE:</b> 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.;)?  <a href="#">[24 CFR 93.303(b)(2)]</a></p>	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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<p>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?  <a href="#">[24 CFR 93.303(b)(3)]</a></p>	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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<p>d. Agreement by the tenant that the owner may institute a lawsuit without notice to the tenant?  <a href="#">[24 CFR 93.303(b)(4)]</a></p>	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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<p>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</p>	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<table border="1"> <tr><td><input type="checkbox"/></td></tr> <tr><td>Yes</td></tr> <tr><td><input type="checkbox"/></td></tr> <tr><td>No</td></tr> </table>	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Exhibit 15-5  
Housing Trust Fund

	<p>opportunity to present a defense, or before a court decision on the rights of the parties?</p> <p><a href="#">[24 CFR 93.303(b)(5)]</a></p>					
	<p>f. Agreement by the tenant to waive any right to a trial by jury?</p> <p><a href="#">[24 CFR 93.303(b)(6)]</a></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. 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?</p> <p><a href="#">[24 CFR 93.303(b)(7)]</a></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. 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><b>NOTE:</b> The tenant may be obligated to pay costs if the tenant loses.</p> <p><a href="#">[24 CFR 93.303(b)(8)]</a></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> <p><a href="#">[24 CFR 93.303(b)(9)]</a></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>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>						

16.

<p>Does the project file include records that demonstrate that each tenant's lease complies with the tenant protections of <a href="#">24 CFR 93.303</a>?</p> <p><a href="#">[24 CFR 93.407(a)(2)(vii), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

Exhibit 15-5  
Housing Trust Fund

**E. RENT COMPLIANCE**

<b>Check the requirement or program area reviewed:</b>
<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.

**Initial Rents at Lease-up**

17.

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

18.

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

19.

<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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<a href="#">[24 CFR 93.302(c)(2), 24 CFR 93.101(d) for subgrantee]</a>	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.	

Exhibit 15-5  
Housing Trust Fund

**Subsequent Rents**

20.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>Did the grantee/subgrantee annually review and approve rents proposed by the owner for HTF units?  <a href="#">[24 CFR 93.302(c)(2), 24 CFR 93.101(d) or subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>		
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

21.

<p>Were tenants in HTF-assisted rental housing charged the correct tenant rent?</p> <p><b>NOTE:</b> 24 CFR 93.302(b) describes the rent limits for each type of tenant as follows:  <b>Extremely low-income tenants.</b> The HTF rent plus utilities of an extremely low-income tenant shall not exceed the greater of 30 percent of the federal poverty line or 30 percent of the income of a family whose annual income equals 30 percent of the median income for the area, as determined by HUD, with adjustments for the number of bedrooms in the unit. HUD will publish the HTF rent limits on an annual basis.  <b>Very-low income tenants.</b> The HTF rent plus utilities of a very low-income tenant shall not exceed 30 percent of the income of a family whose annual income equals 50 percent of the median income for the area, as determined by HUD, with adjustments for the number of bedrooms in the unit. HUD will publish the HTF rent limits on an annual basis.</p> <p>Tenants in a unit that receives Federal or State project-based rental subsidy, and the tenant pays as a contribution toward rent not more than 30 percent of the tenant's adjusted income, the maximum rent is the rent allowable under the Federal or State project-based rental subsidy program.</p> <p><a href="#">[24 CFR 93.302(b), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

Exhibit 15-5  
Housing Trust Fund

22.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Does the project file include records demonstrating that each HTF-assisted unit in the project meets the rent requirements of <a href="#">24 CFR 93.302(b)</a> and <a href="#">(c)</a> ?  <a href="#">[24 CFR 93.407(a)(2)(vi) 24 CFR 93.101(d) for subgrantee]</a>	
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	File #9:	<input type="checkbox"/> Yes <input type="checkbox"/> No
File #10:	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

**F. FLOATING UNITS**

<b>Check the requirement or program area reviewed:</b>
<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.

23.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	<i>If the units are floating and were changed to maintain conformity with the requirements of <a href="#">24 CFR 93.302(g)</a> during the period of affordability, was each substituted unit comparable in terms of size, features, and number of bedrooms to the originally designated HTF-assisted unit?</i>  <a href="#">[24 CFR 93.302(g), 24 CFR 93.101(d) for subgrantee]</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

Exhibit 15-5  
Housing Trust Fund

### G. PROPERTY STANDARDS

<b>Check the requirement or program area reviewed:</b>
<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.

Placed in Service Date: Click or tap here to enter text.

Initial Inspection Date: Click or tap here to enter text.

Date of Most Recent Inspection: Click or tap here to enter text.

24.

Does the grantee/subgrantee have ongoing property condition standards for rental housing (including manufactured housing) that apply throughout the affordability period?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<a href="#">[24 CFR 93.301(e)(1) , 24 CFR 93.101(d) for subgrantee]</a>	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.	

25.

Does the grantee/subgrantee have ongoing property condition standards for rental housing (including manufactured housing) that require project owners to maintain the housing as decent, safe, sanitary and in good repair?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<a href="#">[24 CFR 93.301(e)(1), 24 CFR 93.101(d) for subgrantee]</a>	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.	

26.

Does the grantee/subgrantee have ongoing property condition standards for rental housing (including manufactured housing) that are in sufficient detail to establish the basis for a uniform inspection of the HTF rental project?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<a href="#">[24 CFR 93.301(e)(1) , 24 CFR 93.101(d) for subgrantee]</a>	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.	

Exhibit 15-5  
Housing Trust Fund

27.

Does the grantee/subgrantee have ongoing property condition standards for rental housing (including manufactured housing) that addresses each of the following:	
<p><i>Minimum Property Standards?</i></p> <p><b>NOTE:</b> 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).</p> <p>In accordance with <a href="#">24 CFR 93.301(e)</a>, 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:</p> <ul style="list-style-type: none"> <li>• 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 <a href="#">24 CFR 5.705</a>.</li> <li>• 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 <a href="#">24 CFR 5.703</a>, The National Standards for the Physical Inspection of Real Estate (NSPIRE) and published in the <b>Federal Register</b> for rental housing (including manufactured housing). The requirements in <a href="#">24 CFR 5.705 through 5.713</a> do not apply to the grantee/subgrantee's ongoing property standards.</li> </ul> <p><a href="#">[24 CFR 93.301(e)(1)(i), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Health and safety</i>, requires the housing to be free of all health and safety defects. The standards must identify life-threatening deficiencies that the owner must correct and the time frames for addressing these deficiencies?</p> <p><a href="#">[24 CFR 93.301(e)(1)(ii), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Lead-based paint</i>, if applicable, ongoing lead-based paint maintenance requirements of 24 CFR part 35.935?</p> <p><a href="#">[24 CFR 93.301(e)(1)(iii) 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	



Exhibit 15-5  
Housing Trust Fund

28.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [<a href="#">24 CFR 93.404(a)</a>]</p>	<p>During the period affordability, did the grantee/subgrantee conduct an on-site inspection of the project to determine compliance with the ongoing property standards at <a href="#">24 CFR 93.301(e)</a>?</p> <p>[<a href="#">24 CFR 93.404(d)(2)(i)</a>, <a href="#">24 CFR 93.101(d)</a> for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

29.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [<a href="#">24 CFR 93.404(a)</a>]</p>	<p>During the period affordability, did the grantee/subgrantee conduct an on-site inspection of the project to verify the information (e.g., rent and occupancy) submitted by the owner in accordance with <a href="#">24 CFR 93.302</a>?</p> <p>[<a href="#">24 CFR 93.404(d)(2)(i)</a>, <a href="#">24 CFR 93.101(d)</a> for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

30.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [<a href="#">24 CFR 93.404(a)</a>]</p>	<p>During the period affordability, did the grantee/subgrantee conduct an on-site inspection in accordance with <a href="#">24 CFR 93.404(d)(2)(ii)</a>?</p> <p><b>NOTE:</b> <a href="#">24 CFR 93.404(d)(2)(ii)</a>, requires that the onsite inspection occur 12-months after project completion, and at least once every 3 years thereafter during the period of affordability.</p> <p>[<a href="#">24 CFR 93.404(d)(2)(ii)</a>, <a href="#">24 CFR 93.101(d)</a> for subgrantee]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No	<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

Exhibit 15-5  
Housing Trust Fund

31.

<p>Does the grantee/subgrantee have procedures for ensuring that timely corrective and remedial actions are taken by the project owner to address identified deficiencies?</p> <p><a href="#">[24 CFR 93.301(e)(3), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

32.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p><a href="#">[24 CFR 93.404(a)]</a></p>	<p><i>If the latest project inspection identified deficiencies based on the applicable ongoing property condition standard (i.e., UPCS or NSPIRE), did the grantee/subgrantee conduct a follow-up inspection within 12 months or within a reasonable time frame established by the grantee depending on the severity of the deficiency, to ensure all deficiencies were corrected?</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</p>	<p><b>NOTE:</b> The grantee/subgrantee may establish a list of non-hazardous deficiencies for which correction may be verified by third-party documentation.</p> <p><a href="#">[24 CFR 93.404(d)(2)(iii), 24 CFR 93.101(d) for subgrantee]</a></p>	
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

33.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement?</p> <p><a href="#">[24 CFR 93.404(a)]</a></p>	<p><i>If the latest project inspection identified health and safety violations, were the deficiencies corrected immediately and did the grantee/subgrantee adopt a more frequent inspection schedule for the property?</i></p> <p><a href="#">[24 CFR 93.404(d)(2)(iii), 24 CFR 93.101(d) for subgrantee]</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</p>		
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

34.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p><i>If the inspection occurred <b>BEFORE</b> October 1, 2025</i>, did the grantee/subgrantee inspect a statistically valid sample of units appropriate for the size of the HTF-assisted project, as set forth by HUD through federal register notice?</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</p>	<p><b>NOTE:</b> For projects with one to four HTF-assisted units, the inspectable items (site, building exterior, building systems, and common areas) for each building with HTF-assisted units and 100 percent of the HTF-assisted dwelling units must be inspected.</p> <p><a href="#">[24 CFR 93.404(d)(2)(v), 24 CFR 93.101(d) for subgrantee]</a></p>	
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

35.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p><i>If the inspection occurred <b>AFTER</b> October 1, 2025</i>, did the grantee/subgrantee inspect a statistically valid sample of units appropriate for the size of the HTF-assisted property, as set forth by HUD through federal register notice?</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</p>	<p><b>NOTE:</b> For projects with one to four HTF-assisted units, the HTF grantee must inspect all of the HTF-assisted units and all inspectable areas for each building housing HTF-assisted units.</p> <p><a href="#">[24 CFR 93.404(d)(2)(v), 24 CFR 93.101(d) for subgrantee]</a></p>	
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

36.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Did the project owner annually certify to the grantee/subgrantee that each building in the project was suitable for occupancy based on State and local health, safety, and other applicable codes, ordinances, and requirements, and the ongoing property standards established by the grantee/subgrantee in accordance with <a href="#">24 CFR 93.301</a> ?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No	<a href="#">[24 CFR 93.404(d)(2)(iv), 24 CFR 93.101(d) for subgrantee]</a>	
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

**H. FINANCIAL OVERSIGHT**

<b>Check the requirement or program area reviewed:</b>	
<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.	

37.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	<i>If the project includes ten or more HTF-assisted units</i> , has the grantee/subgrantee conducted an annual assessment of the project’s financial condition to determine the continued financial viability of the project?  <a href="#">[24 CFR 93.404(e), 24 CFR 93.101(d) for subgrantee]</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.		

Exhibit 15-5  
Housing Trust Fund

38.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? [24 CFR 93.404(a)]</p>	<p><i>If the project includes ten or more units</i>, does the project file include records that demonstrate that the grantee/subgrantee conducted an annual assessment of the project’s financial condition to determine the financial viability of the project in accordance with <a href="#">24 CFR 93.404(e)</a>?</p> <p>[24 CFR 93.407(a)(2)(iv), 24 CFR 93.101(d) for subgrantee]</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</p>		

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

**I. ELIGIBLE COSTS**

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

39.

<p><i>If an operating cost assistance was provided to rental housing and the HTF funds were used to pay for ongoing operating costs</i>, were the costs eligible?</p> <p><b>NOTE:</b> Operating cost assistance is limited to paying 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>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 <a href="#">24 CFR 93.201(e)(1)</a></p> <p>[24 CFR 93.201(e)(1), 24 CFR 93.101(d) for subgrantee]</p>	<p><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.

Exhibit 15-5  
Housing Trust Fund

40.

<p><u><i>If an operating cost assistance reserve was provided to rental housing and the HTF funds from the reserve were used to pay for operating costs, were the costs eligible?</i></u></p> <p><b>NOTE:</b> Operating cost assistance is limited to paying 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>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 <a href="#">24 CFR 93.201(e)(1)</a></p> <p><a href="#">[24 CFR 93.201(e)(1), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

41.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p><u><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></u></p> <p><a href="#">[24 CFR 93.201(e)(1) and (2), 24 CFR 93.101(d) for subgrantee]</a></p>										
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">File #1:</td> <td style="width: 40%;"><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</td> </tr> <tr> <td>File #2:</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</td> </tr> <tr> <td>File #3:</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</td> </tr> <tr> <td>File #4:</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</td> </tr> <tr> <td>File #5:</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</td> </tr> </table>	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
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><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>											

42.

<p><u><i>If the grantee/subgrantee charges the project owner an annual compliance monitoring fee, was the fee included in the original project underwriting and based on the average actual cost of performing the monitoring of HTF-assisted rental projects?</i></u></p> <p><a href="#">[24 CFR 93.204(b)(1), 24 CFR 93.101(d) for subgrantee]</a></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

Exhibit 15-5  
Housing Trust Fund

43.

<p><i>If the project owner charges an application fee to prospective tenants, is the fee reasonable?</i></p> <p><a href="#">[24 CFR 93.204(b)(4)(i), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

44.

<p><i>If the project owner charges a parking fee, is the fee customary for rental projects in the neighborhood?</i></p> <p><a href="#">[24 CFR 93.204(b)(4)(ii), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

45.

<p><i>If the project owner charges other fees, are the fees customary for rental projects (e.g., late fees, pet fee, etc.)?</i></p> <p><a href="#">[24 CFR 93.204(b)(4), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

46.

<p><i>If the project owner charges fees for services such as bus transportation or meals, are the services voluntary and fees charged only for services provided to the tenant?</i></p> <p><a href="#">[24 CFR 93.204(b)(4)(iii), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

## J. AUDIT

<p><b>Check the requirement or program area reviewed:</b></p>
<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 15-5  
Housing Trust Fund

47.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>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?</p> <p><b>NOTE:</b> <a href="#">24 CFR 93.404(c)(2)(iii)</a>, <a href="#">24 CFR 93.406(b)</a> require that the written agreement providing HTF assistance to the recipient must specify that the recipient will submit to the grantee a cost certification performed by a certified public accountant for each project assisted with HTF funds.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>If the recipient fails to submit this audit, then it is a failure of the grantee in managing the day-to-day operations of its HTF program, ensuring that HTF funds are used in accordance with all program requirements and written agreements, and taking appropriate action when performance problems arise.</p> <p><a href="#">[24 CFR 93.404(a)</a>, <a href="#">24 CFR 93.101(d) for subgrantee]</a></p>	
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		



Exhibit 15-5  
Housing Trust Fund

48.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>Did the project owner submit to the grantee/subgrantee 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 period of affordability?</p> <p><b>NOTE:</b> <a href="#">24 CFR 93.404(c)(2)(iii)</a>, <a href="#">24 CFR 93.406(b)</a> require that the written agreement providing HTF assistance specify that the recipient will submit to the grantee an annual audit performed on each project assisted with HTF funds, beginning the first year following the cost certification and with the final annual audit occurring the last year of the affordability period.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>If the recipient fails to submit this audit, then it is a failure of the grantee in managing the day-to-day operations of its HTF program, ensuring that HTF funds are used in accordance with all program requirements and written agreements, and taking appropriate action when performance problems arise.</p> <p><a href="#">[24 CFR 93.404(a)</a>, <a href="#">24 CFR 93.101(d) for subgrantee]</a></p>	
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

49.

<p>Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a></p>	<p>Does the grantee/subgrantee have the following records for each completed project assisted with HTF funds include the following: <a href="#">[24 CFR 93.407(a)(4)(iii)</a>, <a href="#">24 CFR 93.101(d) for subgrantee]</a></p>	
<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The cost certification performed by a certified public accountant, pursuant to the written agreement providing HTF assistance?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
	<p>Copy of annual audits, beginning the first year following the cost certification?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>		

Exhibit 15-5  
Housing Trust Fund

### K. PROCUREMENT AND CONTRACTOR OVERSIGHT

<b>Check the requirement or program area reviewed:</b>
<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 compliance 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 any entity. If reviewing this program area, reviewers must complete [Exhibit 34-3a Guide for Review of Procurement](#).

50.

<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 <a href="#">2 CFR part 200</a>?</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Summarize the results of <a href="#">Exhibit 34-3a Guide for Review of Procurement</a> to answer this question. [ <a href="#">24 CFR 93.405</a> , <a href="#">24 CFR 93.101(d)</a> for subgrantee; <a href="#">2 CFR 200.317</a> for States and <a href="#">2 CFR 200.318</a> ]	
<b>Describe Basis for Conclusions:</b> Click or tap here to enter text.	

Exhibit 15-5  
Housing Trust Fund

**L. PROJECT COMPLETION**

<b>Check the requirement or program area reviewed:</b>
<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.

51.

Does the grantee/subgrantee have policies and procedures to implement this requirement? <a href="#">[24 CFR 93.404(a)]</a>	Was all project completion information entered into IDIS, or otherwise provided, within 120 calendar days of the date of the final project drawdown?  HUD considers an HTF grantee/subgrantee to have provided HUD with complete project completion information when the grantee/subgrantee completes all the applicable fields in IDIS based on the HTF activity and tenure type, including total units and leveraged 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.  <b>NOTE:</b> <a href="#">24 CFR 93.2</a> contains the definition of project completion. 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.  <a href="#">[24 CFR 93.402(d)(1), 24 CFR 93.101(d) for subgrantee]</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Yes <input type="checkbox"/> No		

<b>Describe Basis for Conclusion:</b> Click or tap here to enter text.
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**M. RECORD RETENTION**

<b>Check the requirement or program area reviewed:</b>
<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 15-5  
Housing Trust Fund

52.

<p>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?</p> <p><b>NOTE:</b> Income verification records are required as soon as the units are occupied by income eligible families.</p> <p><a href="#">[24 CFR 93.407(b)(1), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

53.

<p>Is the grantee/subgrantee retaining individual tenant income verifications, project rents and inspection records for the <u>most recent</u> five-year period?</p> <p><b>NOTE:</b> Income verification records are required as soon as the units are occupied by income eligible families.</p> <p><a href="#">[24 CFR 93.407(b)(1), 24 CFR 93.101(d)]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	

54.

<p>Does the grantee/subgrantee have a record retention policy that rental project written agreement records be retained for five years after the agreement terminates?</p> <p><a href="#">[24 CFR 93.407(b)(3); 24 CFR 93.404(a), 24 CFR 93.101(d) for subgrantee]</a></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Describe Basis for Conclusion:</b> Click or tap here to enter text.</p>	