|  |  |
| --- | --- |
| **Guide for Review of Homeowner Rehabilitation**  **Projects and/or Policies & Procedures** | |
| **Participating Jurisdiction:**Click or tap here to enter text. | **Subrecipient:**Click or tap here to enter text. |
| **PJ Staff Consulted:**Click or tap here to enter text. | |
| **Name of HUD Reviewer(s):**Click or tap here to enter text. | **Date of Review:**Click or tap here to enter text. |
| **Type of Monitoring Review:** | Project File Review  Policies & Procedures Review  Combined: Project and Policies & Procedures Review |

**NOTE:** All questions contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance.

|  |  |
| --- | --- |
| **File Selection Summary**  **(Required)** | |
| **Program Year(s) Reviewed:** | Click or tap here to enter text. |
| **Number of Files Reviewed:** | Click or tap here to enter text. |
| **How were files selected?** | Random  Non-Random  Statistical  Combination (describe):  Click or tap here to enter text. |
| **Were additional files selected for review**? | Yes  No |
| **If additional files were selected for review, why were files added to the monitoring**?  (select all that apply) | Expand the sample to include a file(s) from each staff person working in the respective program area being monitored;  Expand the sample to include additional files with the same characteristics, (i.e., same problem category, staff person, activities or other characteristics)  Expand the sample to determine whether problems are isolated events or represent a systemic problem.  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 PJ has undertaken.  Other, please specify: Click or tap here to enter text. |

**Instructions:**

* This Exhibit is used to monitor a PJ’s homeowner rehabilitation project files, the PJ’s homeowner rehabilitation program policies and procedures, or a combination of both project files and policies and procedures. Reviewers should note the type of review completed in the check box above.
* The HOME regulation at [24 CFR 92.504(a)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-504) requires PJs to have comprehensive written HOME program policies and procedures. Where applicable, this Exhibit pairs each policies and procedures requirement with its homeowner rehabilitation project requirement. As noted above, the reviewer may use this Exhibit to complete a project file review, a policies and procedures review, or a combination of both project files and policies and procedures. 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, the reviewer *must* examine the related policies and procedures to determine if the finding is associated with a lack of policies and procedures, or a failure of PJ staff to follow the written policies and procedures.
* Reviewers can use this Exhibit to review up to five homeowner rehabilitation project files. If additional files are included in the monitoring, the reviewer should complete another copy of the Exhibit. Section 7-4 in the introduction to this Chapter provides guidance on the number of files to review. Reviewers *must* complete the File Selection Summary table at the beginning of this Exhibit.
* 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.
* The Exhibit is divided into thirteen program areas. Based on the risk assessment and the notification letter sent to the PJ, check the program area(s) under review. Reviewers are *required* to review the beneficiary written agreement for all files monitored as the written agreement is critical to program compliance and oversight. Reviewers should make every effort to review as many other program area sections as possible during the monitoring to obtain an accurate representation of the PJ’s compliance with the HOME program requirements. If a specific program area is not examined, check the “Not Reviewed During Monitoring” box at the beginning of the applicable program area section, and note the reason why the section was not reviewed in the “Describe the Basis for Conclusion” text box of the first question under the applicable program area section.
* Use of this Exhibit requires the completion of other Exhibits: Exhibit 21-1 for Question 24, Exhibit 27-1 for Question 25, Exhibit 24-1 for Question 29, and Exhibits 7-34 and 34-3 for Question 41.

**Check Program Areas Reviewed During Monitoring:**

A. Affirmative Marketing;

B. Project Selection, Commitment and Set-up;

C. HOME Subsidy;

D. Income Determination;

E. Beneficiary Written Agreement, (review required);

F. Ownership and Occupancy Status;

G. Property Requirements;

H. Property Standards;

I. Eligible/Reasonable Costs;

J. Procurement and Contractor Oversight, if applicable;

K. Loan Processing and Servicing;

L. Project Completion; and

M. Record Retention

* The questions in this Exhibit may also be used as an interview instrument for program staff.

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

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **File#** | **Client Name/Address[[1]](#footnote-1)** | **IDIS #** | **HOME Funds Committed** | **Commitment Date** | **Date of Written Agreement** | **HOME Funds Drawn** | **Completion Date** |
| **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 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 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 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 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 here to enter text. |

1. AFFIRMATIVE MARKETING

NOT REVIEWED DURING MONITORING

1.

|  |  |
| --- | --- |
| Has the PJ adopted affirmative marketing requirements and procedures for its homeowner rehabilitation program?  NOTE: If monitoring for compliance with affirmative marketing recordkeeping and data compilation requirements, use Exhibit 22-3, *Guide for Review of Civil Rights-Related Program Requirements for the HOME Investment Partnerships Program.*  [24 CFR 92.351] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

1. PROJECT SELECTION, COMMITMENT AND SET-UP

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

2.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ use its written guidelines to evaluate the project prior to the commitment of HOME funds by assessing ***all*** the following:  [24 CFR 92.250(b)] | | | | | |
| Yes  No |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
|  | Sources and uses of funds and a determination that costs are reasonable? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Firm written commitments for the project? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Subsidy layering? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | *If HOME assistance is provided as an amortizing loan*, an underwriting analysis? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

3.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Before committing HOME funds to the project, did the PJ ensure that ***all*** the following requirements were met:  [24 CFR 92.2 Definition of *Commit to a specific local project* and 24 CFR 92.352(b) for Environmental Review] | | | | | |
| Yes  No |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
|  | Environmental Review was completed, or commitment was conditioned on the completion of the environmental review, (i.e., conditional commitment)? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | All necessary financing secured? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Rehab expected to start within 12 months of written agreement date? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | *If HOME assistance was provided as an amortizing loan*, project underwriting is complete in accordance with  [24 CFR 92.250(b)?](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1250&rgn=div8) | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

4.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ set-up the project in IDIS *following* the commitment of HOME funds as evidenced by the execution of a legally binding written agreement signed and dated by all parties to the agreement? The date of the written agreement must be the same as, or prior to, the commitment date in IDIS.  [24 CFR 92.502(b)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

5.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include records that document ***all*** the following:  [24 CFR 92.508(a)(3)] | | | | | |
| Yes  No |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
|  | Signed Determination of Exemption from Environmental Review or of Categorical Exclusion Not Subject to Related Laws or Authority to Use Grant Funds (Form 7015.16)? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Project financing, schedule, and budget? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Underwriting analysis *if HOME provided as an amortizing loan*? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
|  | Subsidy layering analysis? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
|  | Eligible and reasonable costs? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

1. HOME SUBSIDY

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

6.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the work write-up/cost estimate demonstrate that the project requires rehabilitation work equal to at least $1,000?  [24 CFR 92.205(c)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

7.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Was the amount of HOME subsidy invested in the project at or below the applicable maximum per unit subsidy limit?  [24 CFR 92.250(a)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

8.

|  |  |
| --- | --- |
| Was the HOME subsidy provided in an eligible form of investment (i.e., interest bearing or non-interest-bearing loan or advance, deferred payment loan, grant, or a different form specifically approved by HUD in writing)?  [24 CFR 92.205(b)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

9.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include records that document:  [24 CFR 92.508(a)(3)] | | | | | |
| Yes  No |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| HOME subsidy was:   * At least $1,000, **and** * At or below the maximum per-unit HOME subsidy limits? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| HOME subsidy was provided in an eligible form? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

1. INCOME DETERMINATION

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

10.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ determine that the household qualified as low-income?  [24 CFR 92.203] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

11.

|  |  |
| --- | --- |
| Did the PJ use the applicable income limits when qualifying the household’s income?  [24 CFR 92.203] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

12.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ use one of the two allowable definitions of annual income noted below to qualify the household’s income?  *Check definition of income used in the PJ’s homeowner rehabilitation program:*  Definition of annual income found at [24 CFR 5.609](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5#se24.1.5_1609), or  Adjusted gross income as defined under IRS Form 1040  [24 CFR 92.203(b)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

13.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | *If using the definition of annual income found at* [*24 CFR 5.609*](https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=24:1.1.1.1.5#se24.1.5_1609), did the PJ correctly apply income inclusions and exclusions?  [24 CFR 92.203(b)] | |
| Yes  No | File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
|  | File #4: | Yes  No  N/A |
|  | File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

14.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ examine at least 2 months of source documentation when determining the household’s annual income?  [24 CFR 92.203(a)(2)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

15.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ count the income of all members of the household and project the prevailing rate of income of the household at the time the PJ determined the household’s income?  [24 CFR 92.203(d)(1)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

16.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Was the income determination of the household conducted no more than  6 months before HOME funds were committed to the household?  [24 CFR 92.203(d)(2)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

17.

|  |  |
| --- | --- |
| Do files demonstrate that only one definition of income was used for all homeowner rehabilitation program applicants and that this definition was the definition identified by the PJ’s homeowner rehabilitation program policies and procedures?  [24 CFR 92.203(c)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

18.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include records that demonstrate the PJ determined the household’s income in accordance with [24 CFR 92.203](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1203&rgn=div8)?  [24 CFR 92.508(a)(3)(v)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

1. BENEFICARY WRITTEN AGREEMENT

Instructions: Since written agreements are central to initial and ongoing compliance with HOME requirements, reviewers monitoring project files **MUST** evaluate the written agreements for the HOME 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 PJ staff to follow the written policies and procedures.

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

Check as applicable:

Project File – NOT REVIEWED during monitoring because monitoring is focusing only on policies and procedures.

Policies and Procedures NOT REVIEWED during monitoring. Monitoring is focusing on project compliance and noncompliance was not found.

19.

|  |  |  |  |
| --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include the written agreement with the homeowner with dated signatures of all parties?  [24 CFR 92.508] | | |
| Yes  No | File #1: | Yes  No | Date of the written agreement: Click or tap here to enter text. |
| File #2: | Yes  No | Date of the written agreement: Click or tap here to enter text. |
| File #3: | Yes  No | Date of the written agreement: Click or tap here to enter text. |
|  | File #4: | Yes  No | Date of the written agreement: Click or tap here to enter text. |
|  | File #5: | Yes  No | Date of the written agreement: Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | |

20.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Does the written agreement with the homeowner include each of the following:  [24 CFR 92.504(c)(5)(ii)] | | | | | |
| **Written Agreement Requirement** | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| 1. The estimated after rehab value to ensure compliance with   [24 CFR 92.254(a)(2)(iii) and (b)(1)?](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1254&rgn=div8) | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Housing is the principal residence of an income qualified homeowner? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Amount and form of assistance (e.g., grant, amortizing loan, deferred payment loan)? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. The rehabilitation work to be performed? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Completion date? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| 1. Property standards that must be met? | Yes  No | Yes  No | Yes  No | Yes  No | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | |

1. OWNERSHIP AND OCCUPANCY STATUS

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

21.

|  |  |  |  |
| --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ determine that the property was held in *one of the following eligible forms of homeownership*?   * Fee simple * 99-year ground lease * 40-year ground lease for housing located in insular areas * 50-year ground lease for housing located on Indian land or a Community Land Trust * Ground lease equal to the applicable period of affordability for manufactured housing * Inherited property – NOTE: PJ may assist the owner-occupant of an inherited property with multiple owners as long as the owner-occupant   + Is low-income,   + Occupies unit as principal residence, and   + Pays all costs associated with ownership and maintenance * Life estate * Inter vivos trust – NOTE: PJ may assist if all beneficiaries of the trust qualify as low-income and occupy the unit as principal residence * Beneficiary deed   (Note: A copy of the deed alone is not sufficient. A title search or a recent review of recorded ownership information should have been conducted.)  [24 CFR 92.2 and 24 CFR 92.254(c)] | | |
| Yes  No | File #1: | Yes  No | Form of ownership:  Click or tap here to enter text. |
| File #2: | Yes  No | Form of ownership:  Click or tap here to enter text. |
| File #3: | Yes  No | Form of ownership:  Click or tap here to enter text. |
|  | File #4: | Yes  No | Form of ownership:  Click or tap here to enter text. |
|  | File #5: | Yes  No | Form of ownership:  Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | |

22.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ document in the project file that the property serves as the household’s principal residence?  [24 CFR 92.254(b)(2)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

1. PROPERTY REQUIREMENTS

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

23.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ determine that the project met the HOME after-rehabilitation value limits, i.e., 95% of the median purchase price for the area based on FHA single-family mortgage program data or the PJ’s analysis (e.g., appraisal, tax records, estimate by qualified staff)?  [24 CFR 92.254(b)(1)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

24.

|  |  |
| --- | --- |
| Did the project comply with the environmental review requirements?  (Use Exhibit 21-1, *Guide for Environmental Review of the Community Development Block Grant, HOME Investment Partnerships, Emergency Solutions Grants, and Housing Opportunities for Persons With AIDS Programs by the Community Planning and Development (CPD) Representative* to answer this question.)  [24 CFR 92.352] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

25.

|  |  |
| --- | --- |
| *If assistance was used for rehabilitation of real property located within the Special Flood Hazard Area (SFHA),* did the PJ require compliance with flood insurance? (Use Exhibit 27-1, *Guide for Review of Flood Insurance Protection* to answer this question.)  [24 CFR 92.352] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

1. PROPERTY STANDARDS

NOT REVIEWED DURING MONITORING – Check all that apply

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

26.

|  |  |
| --- | --- |
| Does the PJ have written rehabilitation standards that sufficiently detail the methods, materials, and requirements that the housing must meet upon completion, including ***all*** the following: | |
| 1. Health and Safety?   [24 CFR 92.251(b)(1)(i)] | Yes  No |
| 1. Major systems?   [24 CFR 92.251(b)(1)(ii)] | Yes  No |
| 1. Lead-based paint?   [24 CFR 92.251(b)(1)(iii)] | Yes  No |
| 1. Disaster mitigation (*if applicable*)?   [24 CFR 92.251(b)(1)(vi)] | Yes  No  N/A |
| 1. State and local codes, ordinances and zoning requirements?   [24 CFR 92.251(b)(1)(vii)] | Yes  No |
| 1. Minimum deficiencies that must be corrected based on inspectable items and areas in HUD’s Uniform Physical Condition Standards?   [24 CFR 92.251(b)(1)(viii)] | N/A  \***HUD has not yet issued guidance on the minimum deficiencies that must be corrected under a PJ’s rehabilitation standards.** |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

27.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ identify all life-threatening deficiencies that must be addressed immediately if the housing is occupied?  [24 CFR 92.251(b)(1)(i)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

28.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ require that, upon project completion, each major system, as defined in [24 CFR 92.251(b)(1)(ii),](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1251&rgn=div8) had a remaining useful life of a minimum of 5 years, or for a longer period as specified by the PJ, or the major system was rehabilitated or replaced as part of the rehabilitation?  [24 CFR 92.251(b)(1)(ii)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

29.

|  |  |
| --- | --- |
| Did the project comply with the lead-based paint requirements of [24 CFR part 35](https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title24/24cfr35_main_02.tpl)? (Use Exhibit 24-1, *Guide for Review of Lead-Based Paint Compliance in Properties Receiving Federal Rehabilitation Assistance* to answer this question.)  [24 CFR 92.251(b)(1)(iii)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

30.

|  |  |
| --- | --- |
| *Where applicable*, did the property meet the disaster mitigation requirements?  [24 CFR 92.251(b)(1)(vi)] | |
| File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
| File #4: | Yes  No  N/A |
| File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

31.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the rehabilitation scope of work adequately describe the work to be performed so that the housing will meet the PJ’s rehabilitation standards at completion?  [24 CFR 92.251(b)(2)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

32.

|  |  |  |  |
| --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ conduct an initial inspection to identify the deficiencies that must be addressed during the rehabilitation?  [24 CFR 92.251(b)(3)] | | |
| Yes  No | File #1: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| File #2: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| File #3: | Yes  No | Date of Inspection: Click or tap here to enter text. |
|  | File #4: | Yes  No | Date of Inspection: Click or tap here to enter text. |
|  | File #5: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | |

33.

|  |  |  |  |
| --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ conduct progress inspections to ensure all work was done in accordance with work write-ups?  [24 CFR 92.251(b)(3)] | | |
| Yes  No | File #1: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| File #2: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| File #3: | Yes  No | Date of Inspection: Click or tap here to enter text. |
|  | File #4: | Yes  No | Date of Inspection: Click or tap here to enter text. |
|  | File #5: | Yes  No | Date of Inspection: Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | |

34.

|  |  |  |  |
| --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ conduct a final inspection upon completion of the project?  [24 CFR 92.251(b)(3)] | | |
| Yes  No | File #1: | Yes  No  N/A | Date of Inspections: Click or tap here to enter text. |
| File #2: | Yes  No  N/A | Date of Inspections: Click or tap here to enter text. |
| File #3: | Yes  No  N/A | Date of Inspections: Click or tap here to enter text. |
|  | File #4: | Yes  No  N/A | Date of Inspections: Click or tap here to enter text. |
|  | File #5: | Yes  No  N/A | Date of Inspections: Click or tap here to enter text. |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | |

35.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | *At project completion*, did the final inspection indicate that the property met the PJ’s property standards?  [24 CFR 92.251(b)(1)] | |
| Yes  No | File # 1: | ☐ Yes ☐ No  N/A |
| File # 2: | ☐ Yes ☐ No  N/A |
| File # 3: | ☐ Yes ☐ No  N/A |
|  | File #4: | ☐ Yes ☐ No  N/A |
|  | File # 5: | ☐ Yes ☐ No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

36.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include records that demonstrate inspections were conducted as required (i.e., prior to, during and upon completion of rehabilitation)?  [24 CFR 92.508(a)(3)(iv)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

1. ELIGIBLE/REASONABLE COSTS

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

37.

|  |  |
| --- | --- |
| Do work write-ups, proposals and contracts in the project file demonstrate that all costs paid with HOME funds were eligible including but not limited to:   * Development hard costs associated with rehabilitation * Refinancing costs * Related soft costs   [24 CFR 92.206 (eligible project costs), 24 CFR 92.214 (prohibited activities and fees)] | |
| File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
| File #4: | Yes  No |
| File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

38.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ adequately document the source and application of HOME funds for eligible costs?  [2 CFR 200.302(b)(3)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

39.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Did the PJ review and approve written cost estimates for rehabilitation and determine that costs are reasonable?  [24 CFR 92.251(b)(2)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

40.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Does the project file include records that document ***all*** the following:  [24 CFR 92.508(a)(3)(ii)] | | | | | |
| Yes  No |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| Eligible use of HOME funds? | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| Costs are reasonable? | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
|  | Source and application of HOME funds? | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

1. PROCUREMENT AND CONTRACTOR OVERSIGHT (if applicable)

Instructions: If the PJ procured the services of a contractor to administer its homeowner rehabilitation program, the PJ must adhere to the procurement requirements of 2 CFR part 200. The HOME regulations at   
[24 CFR 92.504(b)](https://www.govinfo.gov/app/details/CFR-2018-title24-vol1/CFR-2018-title24-vol1-sec92-504) require the PJ to execute a written agreement with the contractor. Reviewers must complete the following Exhibits: Exhibit 7-34, *Guide for Review of Contractor Written Agreement* **and** Exhibit 34-3, *Guide for Review of Procurement.*

NOT REVIEWED DURING MONITORING

NOT APPLICABLE – Procurement and Contractor Oversight not applicable to the PJ’s homeowner rehabilitation program.

41.

|  |  |
| --- | --- |
| *If the PJ procured the services of a contractor to administer its homeowner rehabilitation program*, did the PJ adhere to the procurement requirements of [2 CFR part 200](https://ecfr.io/Title-02/cfr200_main)? Summarize the results of Exhibits 7-34 and 34-3 to answer this question.  [24 CFR 92.504(b)] | Yes  No  N/A |
| **Describe Basis for Conclusions:**  Click or tap here to enter text. | |

1. LOAN PROCESSING AND SERVICING

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

42.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | *If the homeowner refinanced as part of the rehabilitation*, did the PJ ensure that *each* of the following requirements were met:  [24 CFR 92.206(b)(1)] | | | | | |
| Yes  No  N/A |  | **File #1:** | **File #2:** | **File #3:** | **File #4:** | **File #5:** |
| Refinancing was necessary to reduce the household’s overall housing costs *and,* | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| Rehabilitation cost was greater than the amount of debt refinanced? | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | | | | | |

1. PROJECT COMPLETION

NOT REVIEWED DURING MONITORING – Check all that apply:

Policies and Procedures NOT REVIEWED, and/or

Project files NOT REVIEWED

43.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | *If the project is complete*, was the project completed within 4 years of the date the HOME funds were committed to the project?  [24 CFR 92.205(e)(1)] | |
| Yes  No | File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
|  | File #4: | Yes  No  N/A |
|  | File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

44.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | Was all project completion information entered in IDIS within 120 days of the final project draw? The data entered in IDIS (e.g., project address, beneficiary information) should accurately reflect the data included in the written agreement and project files.  [24 CFR 92.502(d)(1)] | |
| Yes  No | File #1: | Yes  No |
| File #2: | Yes  No |
| File #3: | Yes  No |
|  | File #4: | Yes  No |
|  | File #5: | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

45.

|  |  |  |
| --- | --- | --- |
| Does the PJ have policies and procedures to comprehensively implement this requirement?  [24 CFR 92.504(a)] | *If the project was not completed within 4 years of commitment*, did the PJ request an extension with all the required information listed in  [24 CFR 92.205(e)(2)](https://www.ecfr.gov/cgi-bin/text-idx?SID=1ae6a6289a821efed55c733d2cd182c2&mc=true&node=se24.1.92_1205&rgn=div8), (i.e., status of project, steps being taken to overcome any obstacles to completion, proof of adequate funding to complete project, and a schedule with milestones for completion), or repay the HOME funds?  [24 CFR 92.205(e)(2)] | |
| Yes  No | File #1: | Yes  No  N/A |
| File #2: | Yes  No  N/A |
| File #3: | Yes  No  N/A |
|  | File #4: | Yes  No  N/A |
|  | File #5: | Yes  No  N/A |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | | |

1. RECORD RETENTION

NOT REVIEWED DURING MONITORING

46.

|  |  |
| --- | --- |
| Is the PJ retaining homeowner rehabilitation project records for five years after project completion?  [24 CFR 92.508(c)(2)] | Yes  No |
| **Describe Basis for Conclusion:**  Click or tap here to enter text. | |

47.

|  |  |
| --- | --- |
| Is the PJ retaining homeowner rehabilitation project written agreement records for five years after the agreement terminates?  [24 CFR 92.508(c)(4)] | Yes  No |
| **Describe Basis for Conclusion:**  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. [↑](#footnote-ref-1)