

HOPE VI REVITALIZATION GRANT HUD MANAGEMENT AND MONITORING

This document describes the various roles that HUD staff plays in managing and monitoring HOPE VI Revitalization grants. Both the Office of Public Housing Investments (OPHI) in HUD Headquarters and the Field Office of Public Housing for the jurisdiction of the Grantee have major responsibilities in the management and monitoring of HOPE VI Revitalization Grants. Most OPHI staff are located at HUD Headquarters; some are outstationed in HUD Field Offices. The OPHI staff responsible for the overall management of the individual HOPE VI grants are Grant Managers. In some cases, the overall management of individual HOPE VI Grants has been delegated to Field Offices, in which case, Field Office staff perform the duties of the Grant Manager. In either case, the HUD Field Office staff have their own responsibilities with regard to HOPE VI Revitalization grant management and monitoring.

This guidance supersedes previous chapters in any “HOPE VI Guidebook” as well as relevant guidance in Notice HUD 95-10, which has expired.

I. DEFINITIONS AND ACRONYMS

Close-Out Certification: The Close-Out Certification is a representation by the Public Housing Authority (PHA) that all HOPE VI funds have been expended. The official date of the Close-Out Certification is the date on which the designated HUD Official signs the Close-Out Certification (Actual HOPE VI Cost Certification form HUD 53001-A). Once the Close-Out Certification is received the HOPE VI close out procedures must be accomplished. The Close-Out Certification is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Closing: The day all of the legal and financial documents (i.e., evidentiary materials) are signed and executed by the parties funding the construction of a mixed finance phase of the HOPE VI grant. One of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Community and Supportive Services (CSS) Plan: The document that describes how the public housing authority (PHA) and its service providers will provide supportive and job-related services to public housing residents at the affected HOPE VI development. Completion of the CSS Plan is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Construction Finish: The completion of physical activity on HOPE VI related construction to include both dwelling and non-dwelling unit construction. This is the date of substantial completion from the local jurisdiction. Construction Finish is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Construction Start: The Construction Start is the date the PHA begins any physical construction to include: dwelling unit construction/rehabilitation, non-dwelling unit construction, or site improvements. This date does not include the time it takes to plan construction/rehabilitation activities, nor should it include the time it takes to demolish or prepare the site for construction. The Construction Start date is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Cost Control and Safe Harbor Standards: Guidelines developed by HUD, in consultation with industry representatives, establishing acceptable and maximum fee ranges for a variety of costs. HUD will review project fees when receiving documents that contain the business and financial terms of a given phase (see Rental Term Sheet below). If a project's fees for eligible activities are at or below a safe harbor standard, HUD will require no additional information. If a project's fees are above a safe harbor standard, but below the maximum standard, HUD will request additional information. Current Cost Control and Safe Harbor Standards may be obtained at:

http://www.hud.gov/utilities/intercept.cfm?/offices/pih/programs/ph/hope6/grants/admin/safe_harbor.pdf

Date of Full Availability (DOFA): The DOFA is the last day of the month in which all housing units in a project are available for occupancy. A unit is considered available if an occupancy permit has been obtained from the responsible local agency. DOFA can be established even if landscaping and punch list items are outstanding.

Declaration of Restrictive Covenants: An evidentiary document, the Declaration of Restrictive Covenants is the first encumbrance recorded against the property. The Declaration of Restrictive Covenants ensures that the project will be developed, operated, and maintained as public housing and will be subject to low-income use requirements for the necessary term.

Developer: An entity contracted to develop (and possibly operate) a mixed-finance development that includes public housing units, pursuant to regulations at 24 CFR 941 subpart F and under the terms of a development agreement. In some cases, the developer may be the PHA itself. A developer often has an ownership interest in the entity that is established to own and operate the units in a mixed-finance development (e.g. as the General Partner of a Limited Partnership).

Development Agreement: The contractual document between the housing authority and its developer that sets forth the rights and responsibilities between the parties with regard to developing the project(s). Execution of the Development Agreement is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

eLOCCS: Web-based electronic Line of Credit Control System used to disburse HOPE VI grant funds.

End of Initial Operating Period (EIOP): The EIOP is the period commencing with the date of project initiation and ending with the earliest of the following three dates:

- 1) The end of the calendar quarter in which 95% of the dwelling units are occupied;
- 2) The end of the calendar quarter that is six, seven or eight months after DOFA; or
- 3) The end of the calendar quarter next preceding the date of physical completion of the project.

Environmental Assessment: All HOPE VI grants are subject to the environmental regulations at 24 CFR, Part 58 or Part 50.

Evidentiary Materials: All the legal documents and materials required in conjunction with HOPE VI mixed-finance development. Separate evidentiary materials must be prepared for each phase of a HOPE VI mixed-finance public housing development and submitted as one package to HUD. The submission of evidentiary materials is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

A list of required mixed finance evidentiary documents may be found at:

http://www.hud.gov/utilities/intercept.cfm?offices/pih/programs/ph/hope6/mfph/mf_evidmaterials.pdf

Draft model evidentiary materials may be found at:

http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/mf_modeldocs.cfm

Field Office (FO): HUD Field Offices are located in 29 Hubs and 16 Program Centers. Program Centers may be located in large, medium or small cities and are headed by Program Center Coordinators who report to the Public Housing Director in the appropriate Hub Office. http://www.hud.gov/offices/pih/about/field_office.cfm

FHEO: Fair Housing and Equal Opportunity. The HUD program office whose mission is to create equal housing opportunities for all persons living in the United States by administering laws that prohibit discrimination in housing on the basis of race, color, religion, sex, national origin, age, disability, and familial status. References to FHEO staff in this document refer to personnel located in FHEO Field Offices.

Hard Costs: The costs directly associated with the construction of a development, including labor, materials, general contractor overhead, profit and contingencies. *Also see Soft Costs.*

Homeownership: HOPE VI funds may be used to provide appropriate replacement homeownership assistance for displaced public housing residents or other public housing eligible low-income families. Middle-Income (for 1999 and prior grants), Section 32, Section 24/9 and Section 8(y) are homeownership programs used in HOPE VI Revitalization grants (definitions of each are included below).

Additional information regarding HOPE VI Homeownership may be obtained at:
<http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/>

HOPE VI Grant Agreement (GA): The document that governs the use of the grant funds and sets forth program requirements. The Form HUD 1044 is the cover sheet of the GA and obligates the HOPE VI funds to the Grantee. Execution of the HOPE VI Grant Agreement is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

HOPE VI Grantee: Recipient of the HOPE VI Revitalization grant.

Housing Construction Cost (HCC): Public Housing funds may not be used to pay for housing construction costs in excess of the HCC limit. The HCC limit is derived by averaging, for a particular market area, R.S. Means “average” residential construction cost index and the Marshall & Swift “good” residential cost index for specific unit sizes and construction types, and adding the resulting formula for all units in the project.

In determining whether housing costs are within this limit, HUD will consider housing unit hard costs; builder’s overhead and profit; utilities from the street; finish landscaping; including Davis-Bacon wages as applicable. A PHA may exceed the HCC using non-Public Housing funds such as CDBG, HOME, low-income housing tax credits, private donations and private financing.

HUD Grant Manager: Grant Managers are responsible for the overall administration of a HOPE VI Revitalization grant.

Field Office HOPE VI Coordinator: The Field Office (FO) employee assigned to coordinate all FO activities necessary to manage and monitor a HOPE VI Revitalization grant.

LIHTC: Low Income Housing Tax Credits. A provision in Section 42 of the IRS Code which allows investors to receive a credit against Federal tax owed in return for providing funds to developers to help build or renovate housing that will be rented only to lower-income households for a minimum period of years. There are two types of credits, both of which are available over a 10-year period: a 9 percent credit on construction/rehab costs and a 4 percent credit on acquisition costs and all development costs financed partially with below-market Federal loans (e.g., tax exempt bonds). Tax credits are generally distributed through State Housing Finance Agencies, a directory of which can be found at <http://ncsha.org/ncsha/public/statehfadirectory/INDEX.htm>. (Please note that the top of the website is open to the public; the balance is for members only.)

Locked Checkpoints: Ten static program schedule milestones determined by the Grantees for phases funded by the HOPE VI grant and tracked through the Quarterly Report system. The ten Locked Checkpoints are as follows:

1. Grant Agreement executed

2. Community and Supportive Services Plan submitted to HUD
3. Revitalization Plan submitted to HUD
4. Mixed-Finance Proposal submitted to HUD per phase (Homeownership phases do not have Mixed-Finance Proposals.)
5. Evidentiary Materials submitted to HUD by phase
6. Development Agreement
7. Closing accomplished per phase
8. Construction started per phase
9. Construction finished per phase
10. Close-Out Certification submitted to HUD

Low-income Unit (non-public housing): A unit of affordable housing (e.g., a LIHTC unit) that is income and/or income restricted but is not designated as a public housing unit. Local, state or Federal funds are used to write down the construction or operating costs of these units to minimize rental costs and increase affordability.

Management Agreement: A document between the owner of a development and the agent who will manage the property on the owner's behalf. The Management Agreement describes the owner and agent's responsibilities in the management of the project. The Management Agreement also ensures operation of the project in accordance with public housing requirements.

Management Plan: The description of how the agent will meet the requirements of the Management Agreement.

Market Rate Units: Housing units for which renters or homeowners do not have income eligibility restrictions. HOPE VI funds **may not** be used to develop market rate units or affordable housing units, which do not qualify as public housing, or homeownership replacement units, as described under Replacement Units, below. In mixed-finance development projects that include public housing units and non-public housing units, this requirement may be satisfied by a determination that the ratio of HUD public housing funds from all sources, in relation to all development funds, is less than or equal to:

1. The ratio of public housing (ACC rental and Homeownership replacement) units to all project units, or
2. The ratio of public housing (ACC rental and Homeownership replacement) unit square foot area to total project square foot area.

Middle-Income Homeownership Program: Formerly known as Nehemiah-like Homeownership, the Middle-Income Homeownership Program provides homeownership opportunities to households whose income do not exceed the greater of (a) 100% of the area median income (AMI) for a family of four or (b) 100% of the national median income for a family of four on the date of purchase of the home. However, in order to achieve or maintain neighborhood stability, HUD may permit a PHA to allow up to 15% of households to earn up to 115% of AMI with a letter/certification of support from the local government.

PHAs implementing a Middle-Income Homeownership Program may use their HOPE VI funds to provide the following services:

1. downpayment or closing cost assistance;
2. provision of subordinate mortgages (including a direct assistance program);
3. construction or permanent financing (i.e., write-downs) for new construction or substantial rehabilitation costs related to homeownership replacement units; and/or
4. other activities in support of the above primary homeownership activities including, but not limited to:
 - (a) demolition to make way for new construction,
 - (b) abatement of environmentally hazardous materials,
 - (c) relocation assistance and mobility counseling,
 - (d) homeownership counseling,
 - (e) site improvements,
 - (f) administration costs,
 - (g) marketing costs, and
 - (h) legal costs associated with the program.

Additional information may be obtained at:

<http://hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5>

Mixed-Finance Annual Contributions Contract (Mixed-Finance ACC): The Mixed-Finance ACC is a contract between HUD and the HA that identifies and confirms the addition of public housing units to the PHA's annual contributions contract. It also confirms the eligibility of these replacement units for other benefits such as operating subsidy and modernization funds. The exhibits to the Mixed-Finance ACC summarize the terms of the mixed-finance transaction. The Mixed-Finance ACC itself is a boilerplate document. However, the exhibits to the Mixed-Finance ACC are tailored for each phase of a project.

Mixed Finance Proposal: The proposal submitted to HUD for the use of public and private sources of funds for the development of public housing units, and possibly affordable units and market rate units that will be owned by an entity other than the public housing authority. The Mixed Finance Proposal consists of the Rental Term Sheet (see Rental Term Sheet below) plus the following information:

- a) Ten year operating pro-forma;
- b) Documents relating to financing;
- c) Draw schedule;
- d) Schematic drawings;

- e) Building design;
- f) Outline specifications;
- g) Plans for non-dwelling space;
- h) Site information;
- i) Market study;
- j) Development construction cost estimate and development schedule;
- k) Adequate facilities;
- l) Relocation plan (or copy of HUD approval letter);
- m) Cost comparison of new construction;
- n) Certifications and assurances.

Submission of a Mixed Finance Proposal is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

Additional information about mixed-finance may be found in 24 CFR 941 subpart F and at: <http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5> and http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/project_review.cfm

Mixed-Income Development: A mixed-finance development that includes a combination of public housing and non-public housing units.

Nehemiah: HOPE VI grantees between 1993 – 1999 are eligible to use a Nehemiah-like approach, now called the Middle-Income Homeownership Program, for homeownership plans (see Middle-Income Homeownership Program above).

Additional information may be obtained at:
<http://hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5>

Neighborhood Network: Computer centers in public housing for the purpose of enhancing self-sufficiency, employability, and economic self-reliance of public housing residents by providing them with on-site computer access and training resources. Availability of funds for the establishment and operation of Neighborhood Networks is announced in a NOFA.

OGC: Office of General Counsel, located in HUD Headquarters and in Field Offices. OGC is HUD's legal counsel.

OMB Circulars and Administrative Requirements: Documents that provide recipients of Federal funds with the administrative requirements related to the expenditure of funds. Copies of OMB Circulars and sections of the Code of Federal Regulations (CFR) can be found on HUDCLIPS.

1. Administrative requirements applicable to PHAs:
 - 24 CFR part 85: Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.

- OMB Circular A-87: Cost Principles for State, Local and Indian Tribal Governments.
2. Administrative requirements applicable to nonprofit organizations:
- 24 CFR part 84: Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-Profit Organizations.
 - OMB Circular A-122: Cost Principles for Non-Profit Organizations.

Operating Subsidy Only Units: Public housing units that are developed without public housing monies, but which receive operating subsidy. Because the units are public housing units, they must be developed in compliance with all statutory requirements for Public Housing, including Davis-Bacon wage rate requirements, environmental assessment requirements, etc., even though no public housing funds are used for construction.

OPHI: Office of Public Housing Investments, located at HUD Headquarters. OPHI includes the Office of Capital Improvements, which administers the Capital Funds Program (for Public Housing development and modernization), the Special Applications Center (see below), and the Office of Urban Revitalization, which administers the HOPE VI program.

PHAS: Public Housing Assessment System. Annually, HUD's Real Estate Assessment Center (REAC) determines the overall performance of the nation's 3,300 PHAs by combining physical, financial, management, and customer satisfaction assessment results. More information may be obtained at: <http://www.hud.gov/offices/reac/products/prodphas.cfm>

Project Review Panel: OPHI has established a Project Review Panel with the purpose of reviewing Rental Term Sheets submitted by PHAs for each mixed-finance transaction. The Project Review Panel, similar to a bank loan committee, is a committee that meets regularly to perform timely review of mixed-finance projects. To facilitate the review and approval process, HUD has developed a Rental Term Sheet for PHAs to complete and submit to HUD for each mixed-finance transaction. The Rental Term Sheet includes a description of the program and specific business terms and is the basis of the Mixed-Finance Proposal.

Additional information regarding the Project Review Panel may be obtained at: http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/project_review.cfm

Program Manager: An entity procured by the Grantee to manage the HOPE VI program on behalf of the PHA.

Quarterly Reports: A reporting mechanism designed to capture Financial, Production, Milestone, CSS and Narrative Information about a Grantees progress for use by the Grantees to manage their grant and to satisfy HUD's reporting requirements.

The Quarterly Report system is internet-based and enables Grantees to improve resource management by updating spending and production schedules every quarter to reflect the most up-to-date project status. Known also as the Grant Management System (GMS) the system provides "Real Time" Financial, Production, Milestone and CSS reports. These reports keep HUD Headquarters officially informed of each grant's progress and pending needs. The GMS provides "Static Reports" reflecting the final quarterly data for each grant and Grantees can use these reports to guide grant progress discussions with HUD.

Recovery and Prevention Corps (RPC): The Recovery and Prevention Corps, reporting through the Coordination and Compliance Division of the Office of Field Operations, offers assistance to HUD Field Offices, in various matters, including HUD oversight of HOPE VI award implementation. The RPC's primary mission is to facilitate and assist Field Offices in developing capacity for prevention of decline, and performance recovery of Troubled and near-Troubled Public Housing Authorities through Field Office and RPC partnering, technical assistance, and consulting. Another important mission is to respond to the Office of Field Operations' hot issues and high-profile PHA problems through analysis and implementation of immediate interventions and long-term recovery remedies in partnership with its respective Hub Offices/Program Centers. PIH Hub Offices and their Program Centers have primary responsibility and authority for PHA performance recovery. If a HOPE VI Grantee is designated Troubled, the responsible HUD PIH Field Office may seek assistance to recover PHA performance, directly from the RPC or through RPC contracted expertise.

Regulatory and Operating Agreement: A regulatory document between the PHA and the Owner of the mixed-finance project that formalizes the PHA's methodology for allocating operating subsidy and ensures operation of the project in accordance with public housing requirements.

Rental Term Sheet: The Rental Term Sheet consists of four sections that are to be filled out by the PHA as part of the Mixed-Finance Proposal and submitted to the HUD Grant Manager for presentation to the Project Review Panel. The four sections include: The Specific Phase Project Summary; a Program Overview; a Specific Phase Overview, and a Statement of Business Terms.

Additional information about Rental term Sheets may be found at:

<http://www.hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5>

Replacement Units: Rental replacement units will be deemed to be public housing replacement units and qualify for operating subsidy only if:

1. Combined with public housing homeownership replacement units, the units do not exceed the total number of units demolished and/or disposed of at the targeted

- severely distressed public housing project identified in the funded HOPE VI application and revitalization plan, and
2. The units are to be placed under an ACC and operated as public housing units.

Homeownership replacement units: HOPE VI funds may be used to provide appropriate replacement homeownership assistance for displaced public housing residents or other eligible low-income or moderate-income families. *See Homeownership.*

Revitalization Plan: The Revitalization Plan consists of a series of discrete documents and submissions, which when viewed as a whole represent the entire plan for the project. Items included in the Revitalization Plan include, but are not limited to: the development description, site plan, the number and type of units that will be constructed, the budget and the program schedule. These documents and submissions are outlined in more detail in the Grant Agreement. Completion of the Revitalization Plan is one of the 10 Locked Checkpoints in the HOPE VI Quarterly Report system.

SAC: Special Applications Center, located in HUD's Chicago office. The SAC processes Section 18 demolition and disposition applications, Section 32 Homeownership applications, voluntary and mandatory conversion requests, and related documentation. Its website is <http://www.hud.gov/offices/pih/centers/sac>.

Section 3: The purpose of Section 3 of the Housing and Urban Development Act of 1968 (Economic Opportunities for Low and Very Low-Income Persons in Connection with assisted Projects) is to ensure that, to the greatest extent feasible, and consistent with Federal, State and local laws and regulations, training, employment and other economic opportunities generated by certain HUD financial assistance will be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons. Program regulations are at 24 CFR part 135. More information can be found at: www.hud.gov/fhe/sec3over.html.

Section 8(y) Homeownership: The Section 8(y) Homeownership Option may be offered by PHAs who administer the Section 8 Housing Choice Voucher Program. The regulations for the Section 8(y) program may be found at 24 CFR § 982.625-43. Under the Homeownership Option, PHAs may allow Housing Choice Voucher homeownership participants to purchase homes that are owned by a PHA or have received PHA-funded construction write-downs. PHAs are able to layer the following subsidies in order to make homes affordable to low-income purchasers:

1. Housing choice voucher program homeownership assistance used as monthly assistance payments to cover approved homeownership costs;
2. PHA-funded construction write-downs to cover the gap between the development cost and the sales price of the home; and

3. For eligible PHAs using Middle-Income Homeownership programs, PHA-funded direct assistance made to purchasers in the form of a subordinate mortgage or other downpayment or closing cost assistance.

Additional information may be found at:

<http://www.hud.gov/offices/pih/programs/hcv/forms/guidebook.cfm>

Section 24/9 Homeownership: The Quality Housing and Work Responsibility Act (QHWRA) permits PHAs, through Sections 24 and 9 of the U.S. Housing Act of 1937, to engage in “appropriate replacement homeownership activities.” PHAs may use construction financing, other private resources, HOPE VI funds, and/or Capital Funds to finance the activities included in a Section 24/9 homeownership plan. Only persons at 80% of area median income (AMI) or below are eligible to receive assistance through any funds appropriated under the Act. Section 24 is available for all HOPE VI grantees. Section 9 is available to PHAs using Capital Funds for homeownership activities.

PHAs may currently use their funds to provide the following services:

1. downpayment or closing cost assistance;
2. provision of subordinate mortgages (including a direct assistance program);
3. construction or permanent financing (i.e., write-downs) for new construction, acquisition, or rehabilitation costs related to homeownership units; and
4. other activities in support of the above primary homeownership activities including, but not limited to: (a) demolition to make way for new construction, (b) abatement of environmentally hazardous materials, (c) relocation assistance and mobility counseling, (d) homeownership counseling, (e) site improvements, (f) administration costs, (g) marketing costs, and (h) legal costs associated with the program.

Additional information may be obtained at:

<http://hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5>

Section 32 Homeownership: Under Section 32, a PHA may (1) sell all or a portion of a public housing development to eligible public or non-public housing residents, (2) provide Capital Fund assistance to public housing families to purchase homes, and (3) provide Capital Fund assistance to acquire homes that will be sold to low-income families. The final Section 32 rule replaces the Section 5(h) rule and does not govern new construction or substantial rehabilitation of units. PHAs may develop public housing rental units per 24 CFR 941, which may in turn be sold under Section 32.

For additional guidance on the Section 32 program, refer to the *Section 32 Desk Guide* found at <http://www.hud.gov/offices/pih/centers/sac/homeownership/> and at:

<http://hud.gov/offices/pih/programs/ph/hope6/mfph/index.cfm#5>

Soft Costs: Non “bricks and mortar” costs incurred in the development of a project, including third party expenses such as design and legal fees, taxes, insurance, construction loan debt service, developer overhead and profit, etc.

Subsidy Layering Review: This analysis evaluates projects using HOPE VI funds in combination with other governmental assistance, specifically Low Income Housing Tax Credits, to ensure that no more than the necessary amounts of HOPE VI Program funds are invested in any one project to provide affordable housing. Subsidy Layering Reviews are completed by the Grant Manager as part of the preliminary evidentiary review process, and the results are included in the evidentiary approval letter. In a limited number of cases, the State performs the subsidy layering review.

Total Development Costs (TDC): Maximum amount of public housing funds that may be used in developing public housing units. In order to establish cost guidelines in accordance with Section 6 (b)(2) of the United States Housing Act of 1937, HUD has used R.S. Means “average” and Marshall & Swift “good” indices to establish the TDC limits for localities throughout the United States.

The TDC limit applies to the costs of developing public housing that may be paid from public housing funds. The term “public housing funds” is defined to include Capital Funds, public housing development funds, Major Reconstruction of Obsolete Projects (MROP) funds, and HOPE VI funds. In order to determine whether a public housing project satisfies the TDC limit, HUD will consider all HUD-approved costs for planning, administration, site acquisition, relocation, demolition, site remediation, site development (except as noted in the most current TDC notice), the dwelling unit hard costs, including construction and equipment, interest and carrying charges, builder’s overhead and profit, on-site streets and utilities from the street, off-site facilities including community buildings, finish landscaping, a contingency allowance, insurance premiums and any initial operating deficit. This calculation also includes costs attributable to Davis-Bacon wage rates, as applicable. Cost of demolition of units not replaced on site; extraordinary site costs verified by an independent engineer; and CSS costs are excluded from the TDC analysis.

Uniform Relocation Act (URA): The URA sets forth the relocation assistance requirements with respect to the displacement of any family, individual, business, nonprofit organization, or firm as a direct result of acquisition, rehabilitation or demolition undertaken during a federal or federally funded program. Mixed-finance projects that cause temporary or permanent displacement must prepare and implement a relocation plan in accordance with the URA requirements.

Additional HOPE VI-related definitions may be found on the HOPE VI website at:
<http://www.hud.gov/offices/pih/programs/ph/hope6/pubs/glossary.pdf>

II. GRANT MANAGEMENT AND MONITORING

A. Grant Management: Each HOPE VI Revitalization Grant has been assigned to a HUD Grant Manager from OPHI or a Field Office. The Grant Manager is responsible for coordinating the following actions:

1. Conducting an initial site visit to debrief the Grantee on concerns and issues related to the initial application. The Grant Manager is also responsible for requesting, reviewing and approving the supplemental submissions, including the budget and program schedule, and consequently, the Revitalization Plan.
2. Coordinating review of the Community and Supportive Services Workplan.
3. Approving any demolition pursuant to the Revitalization Plan (if the demolition was not already approved under Section 202 or Section 18) for any grant with a Revitalization Plan approved after October 21, 1998.
4. Tracking progress of applications being reviewed by the SAC, including disposition, elderly-only designation, homeownership plans, et cetera.
5. Tracking the overall status of the grant. The Locked Checkpoints from the Quarterly Reports are monitored on a weekly basis. The balance of the Quarterly Reports are monitored at least once per quarter.
6. Providing assistance to Grantees in structuring innovative arrangements for replacement housing, including leveraged financing, public/private financing, tax credits, mixed-income development, et cetera.
7. Reviewing rental and/or homeownership term sheets, as applicable, and presenting to the Project Review Panel for approval.
8. Drafting approval letters for rental and homeownership programs.
9. Reviewing rental and homeownership evidentiary materials for programmatic compliance.

10. Coordinating OGC's review of the legal documents and the Field Office's review of the management documents.
11. Conducting TDC and subsidy-layering analysis, when applicable, and drafting evidentiary approval letters, which release funds.
12. Ensuring the Field Office Director is copied on all correspondence generated for each grant in her/his jurisdiction.
13. Reviewing and approving budget requests.
14. eLOCCS:
 - a. eLOCCS: Ensuring that budgets and other funding approvals are spread into eLOCCS.
 - b. Reviewing and approving voucher drawdowns that hit edits in eLOCCS.
15. Reviewing and approving all proposed changes to the program schedule to ensure compliance with the Grant Agreement and Locked Checkpoints:
 - a. FY 1993-1996 Grantees were not given specific deadlines to complete activities, although there was an expectation that activities would be completed within five years of grant agreement execution. However, in 2002, all Grantees established their Locked Checkpoints for key dates that must be met to remain in compliance with the Grant Agreement unless the Deputy Assistant Secretary granted extension(s) (see Locked Checkpoints in "Definitions and Acronyms").
 - b. FY 1997-1999 Revitalization Grant Agreements required the Grantee to execute the General Contractor's (or equivalent) Agreement and commence activities within 18 months from the date HUD approved the Revitalization Plan but no later than 24 months from the date of Grant Agreement execution. Grantees must complete construction within 48 months from the date of HUD's approval of the Revitalization Plan, but no later than 54 months from the date of the execution of the Grant Agreement. All Locked Checkpoints

must conform to these time requirements unless the Deputy Assistant Secretary has granted extensions.

- c. FY 2000 - 2001 Revitalization Grant Agreements require the Grantee to execute the Development Agreement within 12 months from the date HUD approves the Supplemental Submissions, but no later than 18 months from the date of Grant Agreement execution. Grantees must complete construction within 48 months of the date of HUD's approval of the Revitalization Plan, but no later than 54 months from the date of execution of the Grant Agreement. All Locked Checkpoints must conform to these time requirements unless extensions have been granted by the Deputy Assistant Secretary.
- d. FY 2002 Revitalization Grant Agreements require the Grantee to expend all HOPE VI funds by September 30, 2008; funds not expended by that date will be recaptured by the Treasury and will not be available for obligation or expenditure for any purpose. Grantees must submit the development proposal for the first phase of construction within 12 months of Grant Agreement execution; must start construction within 12 months from the date of HUD's approval of the Supplemental Submissions, which period may not exceed 15 months from the date the Grant Agreement is executed; and must complete construction within 48 months from the date of HUD's approval of the Supplemental Submissions, which period may not exceed 54 months from the date the Grant Agreement is executed. All Locked Checkpoints must conform to these time requirements unless the Deputy Assistant Secretary has granted extensions.
- e. FY 2003 Revitalization Grant Agreements require the Grantee to expend all HOPE VI funds by September 30, 2009; funds not expended by that date will be recaptured by the Treasury and will not be available for obligation or expenditure for any purpose. Grantees must submit the development proposal for the first phase of construction within 12 months of the grant award; must start construction within 12 months from the date of HUD's approval of the Supplemental Submissions,

which period may not exceed 18 months from the date the Grant Agreement is executed; and must complete construction within 48 months from the date of HUD's approval of the Supplemental Submissions, which period may not exceed 54 months from the date the Grant Agreement is executed. All Locked Checkpoints must conform to these time requirements unless the Deputy Assistant Secretary has granted extensions.

16. Reviewing and approving Requests for Proposals (RFPs) and Requests for Qualifications (RFQs) as appropriate.
17. Reviewing and approving contracts between Grantees and Program Managers and Developers, as required.
18. Responding to questions and requests for policy determinations and present it to the Policy Panel as necessary.
19. Responding to status reports and program statistics from Grantees, Field Offices, Partners, Consultants, Congress, and others.

B. Grant Manager Monitoring:

1. Reviewing status of the Locked Checkpoints on a weekly basis and following up with guidance or default letters as required, and processing non-Locked Checkpoint related warning or default letters as required.
2. Confirming that the Field Office Monitoring Report's Locked Checkpoint component is appropriate for the circumstances.
3. Monitoring the Grantee's progress in meeting its Locked Checkpoints, curing any defaults and ensuring that required monetary deductions are implemented in a timely fashion.
4. Reviewing the Quarterly Report for progress in areas other than the Locked Checkpoints.
5. Reviewing eLOCCS reports for progress in obligation and expenditure of funds, including excessive drawdowns.

6. Reviewing for compliance with the requirement to use best efforts to obtain a 15 percent match from the City for the provision of supportive services (for FY1993-1995 Grants) or other match requirements contained in the Grant Agreements (FY 1999 and subsequent grants).
7. Depending on grant status and risk, make a technical assistance on-site visit to each assigned HOPE VI PHA.

III. HUD FIELD OFFICE ROLE

A. Field Office Lead Responsibilities

Each HUD Field Office Public Housing office with one or more PHA selected for a HOPE VI Revitalization grant must have one Public Housing staff person assigned as a HOPE VI Coordinator. The HOPE VI coordinator acts as a point of contact for all HOPE VI activity within the Field Office. The HOPE VI Coordinator will also communicate and coordinate activities with HOPE VI Grant Managers, local HUD FHEO staff and others as appropriate. Each HOPE VI Coordinator should also have a designated backup.

The Field Office HOPE VI Coordinator plays the lead role in performing or coordinating the following actions:

1. Assist Grantees in the preparation of demolition, disposition, homeownership or other applications when requested.
2. Coordinate HOPE VI grant funds and activities with other management improvement and capital funds approved for HOPE VI developments.
3. Coordinate HOPE VI grant funds with any resident initiative grants that may have been approved for HOPE VI developments to maximize outcomes and avoid duplication of funding.
4. Review program implementation status on a quarterly basis by utilizing the HOPE VI Quarterly Progress Reporting (QPR) system, with emphasis placed on adherence to Locked Checkpoint dates.
5. ACC Amendments:
 - a. Review and process ACC amendments as necessary to reduce operating subsidy as a result of relocation, reconfiguration, and/or demolition.
 - b. Reinstate operating subsidy for replacement housing.

- c. Assign project numbers to revitalized development(s).
 - d. Prepare, process and execute non-Mixed Finance ACC Amendments (e.g., acquisition projects funded entirely with HOPE VI or other PHA funds).
 - e. Prepare, process and execute a separate ACC upon PHA's request and establish a separate allowable expense level (AEL).
 - f. Execute Mixed-Finance ACC Amendments and Homeownership Agreement Addendums.
6. Revitalization Plan/Mixed-Finance Proposal:
- a. Review and approve 6(h) new construction certification when requested by OPHI.
 - b. Review and approve facilities assessment when requested by OPHI.
 - c. Review and make recommendations to the Grant Manager relative to any management agreements, management plans and leases.
 - d. Review and approve admittance and occupancy plan.
7. Management:
- a. Review and make recommendations to the Grant Manager relative to any management agreements, management plans and leases.
 - b. Coordinate HOPE VI-funded management improvement activities with those approved under other funding sources to avoid duplication of funding.
 - c. Review and approve tenant assignment and selection plan.
 - e. Review cost allocation personnel costs and other administrative expense distribution among available PHA funding sources.
8. Coordinate and review environmental assessment and approve Release of Funds (24 CFR part 50 or 58) as appropriate.
9. Coordinate site and neighborhood standard reviews for proposed replacement units with FHEO, in accordance with Grant Agreement requirements.
10. Verify evidence of site control and appropriate zoning.

11. Review and approve site acquisition proposals (24 CFR part 941.303).
12. Review plans and specs for new construction and rehabilitation when requested by OPHI.
13. Assist, as needed, in the formation, recognition, and involvement of viable resident councils at the HOPE VI development.
14. Coordinate FHEO training (i.e., Section 3, employment and contracting opportunities).
15. Other duties as may be assigned by Headquarters.

B. Field Office Review and Comment Responsibilities

The Field Office participates in the review of the following when requested by OPHI:

1. Resident consultation plan;
2. Accessibility requirements;
3. Community and Supportive Services Plan;
4. Subgrant agreements;
5. Methodology of distribution of operating subsidy to project; and
6. Rental Term Sheet.

IV. FIELD OFFICE MONITORING

Each Field Office should conduct an annual risk assessment for each HOPE VI grant in its jurisdiction. The risk assessment should consider such factors as:

- The number of Missed Locked Checkpoints;
- Open HOPE VI-related findings from Office of Inspector General reports, IPA audits and prior Field Office HOPE VI monitoring review reports;
- The Field Office over-all risk assessment;
- PHAS and SEMAP scores;
- Adverse publicity.

(Please refer to HOPE VI Risk Assessment Form, Attachment A)

The HOPE VI Grant Manager should be notified of the risk assessment results.

The Field Office should use the risk assessment to determine both whether an on-site monitoring review should be conducted as well as which areas of the HOPE VI grant should be reviewed. Additionally, the risk assessment should be used to determine if a remote review or other off-site monitoring should be performed.

Each HOPE VI grant should receive an initial review within 18 months of the grant award. Additionally, each grant should be reviewed at least one time during the balance of the grant.

The balance of the Field Office Monitoring Guidance provides information about construction monitoring as well as eighteen other areas for consideration. The only required activity is the review of Locked Checkpoints. Field Offices are free to choose among the other topics for their on-site reviews as well as to add topics they deem appropriate.

A. Construction Monitoring

1. All HUD Field Office staff, as part of the annual HOPE VI review, should inspect developments under construction at least once. Additional inspections may be conducted by Field Office staff as determined by the Field Office Director based on the risk analysis of the HOPE VI Grantee and Project, availability of Field Office staff and the availability of travel funds.

The Office of Capital Improvements of the Office of Public Housing Investments must approve any Field Office request to use the Army Corps of Engineers (ACOE) services to conduct construction inspections prior to issuing a work order to the ACOE.

Normally, change orders will be reviewed on-site as part of the annual HOPE VI review. However, if circumstances warrant, the Field Office Director may request PHA submission of change orders to the Field Office. Change orders subject to HUD approval (due to HUD-established procurement dollar thresholds) must be submitted to the Field Office and reviewed within 14 days in accordance with HUD's Procurement Handbook 7460.1 (page 11-13).

- a. The HUD Field Office staff assigned to conduct the on-site inspections should review the plans and specifications prior to the inspection. A copy of the plans and specifications should be requested from the Grantee.
- b. The assigned HUD Field Office staff should inspect the work for compliance with the Grantee's approved development proposal and Revitalization Plan. Field Offices may wish to consider using the Physical

Inspection Report Format used by the ACOE as a base to document the inspection. (Please refer to ACOE Inspection Form, Attachment B.) The form should be embellished to provide a snapshot of the actual inspection.

c. Results of construction inspections conducted as a result of the annual HOPE VI review should be included in the Field Office's HOPE VI monitoring report.

d. Results of more frequent inspections must also be documented with the information formally relayed to the Grantee. A completed inspection report identifying findings, observations and recommendations should be submitted to the Grantee within 14 calendar days of the inspection.

e. Assigned HUD Field Office staff conducting the inspection should discuss identified safety or health hazard(s), with the PHA's representative or designee before leaving the site. If the safety or health hazard represents a serious threat to health, injury or property damage, HUD staff should also immediately notify the PHA's Executive Director or designee and the Field Office Director.

f. The PHA is required to furnish a written response to the assigned HUD Field Office staff person regarding any actions taken or to be taken as appropriate to remedy the findings and/or address the recommendations contained in the inspection report. A copy of the PHA response shall be provided to the Grant Manager.

2. ACOE: In the event the Field Office Director has requested and received approval from the Capital Fund Division of OPHI to issue a work order to the ACOE, the ACOE is expected to conduct the inspection and provide the report in the format and timeframe outlines in the agreement between HUD and the ACOE, including, but not limited to, the following:

a. After completion of an inspection/review, the ACOE shall prepare a report using the Physical Inspection Report Format and submit it to the Field Office within 5 working days.

b. For all inspections/reviews, the ACOE shall discuss the inspection results and the corrective action required with the PHA on-site representative and shall submit the report, identifying findings, observations and recommendations, to the FO HOPE VI Coordinator or other person designated by the Field Office Director. The assigned HUD Field Office staff shall examine the report for completeness and shall send a copy with a transmittal letter signed by the Field Office of Public Housing Director to the Grantee and the Grant Manager. If warranted, the assigned HUD Field Office staff shall

contact the ACOE representative to discuss the areas of concern on the report and advise on corrections.

- c. The PHA is required to furnish a written response to the assigned HUD Field Office staff person regarding any actions taken or to be taken as appropriate to remedy the findings and/or address the recommendations contained in the ACOE inspection report. A copy of the PHA response shall be provided to the Grant Manager.
- d. If the ACOE inspection identifies any safety or health hazard(s), the ACOE representative shall discuss these with the PHA's representative or designee before leaving the site. If the safety or health hazard represents a serious threat to health, injury or property damage, the ACOE representative shall also immediately notify the PHA's Executive Director or designee, and the assigned HUD Field Office staff person.

B. On-Site Monitoring

HUD Field Office staff will make on-site monitoring visits to each HOPE VI site, based on determination of risk. It is anticipated the Field Office staff will make an on-site visit once per year unless the risk assessment determines that an on-site visit is not necessary. The Field Office will prepare a monitoring visit report to the PHA.

Field Offices are encouraged to coordinate these visits with staff from the Office of Fair Housing and Equal Opportunity (FHOO). These monitoring visits should be a well-coordinated effort involving input from the assigned HOPE VI Grants Manager. The scope of the annual visit should be tailored to the activities currently being undertaken and subsequent annual monitoring visits should focus on activities that have occurred since the last on-site visit and to follow up on deficiencies identified during the previous on-site monitoring visit.

Additional monitoring visits are encouraged and should be scheduled on a risk management basis and particularly in those instances where significant deficiencies have been identified and any of the HOPE VI Locked Checkpoints are in danger of being missed. In those cases where HOPE VI monitoring visits require Field Office staff to remain away from their duty station on overnight travel, the Field Office may request travel cost reimbursement from Headquarters.

Field Office staff will be responsible for assessing whether the PHA's reporting in the HOPE VI Quarterly Progress Reporting (QPR) system is accurate with a special emphasis on the Locked Checkpoints, as well as assessing whether the grantee has adequate systems and controls in place to ensure compliance with program requirements during the implementation of the program activities.

Special attention should be given for monitoring the PHA's adherence to its systems, controls, policies, procedures, and program schedule. Field Office staff is encouraged to provide technical assistance and to maintain an open dialogue with the assigned Grants Manager during the annual monitoring review visit. The monitoring report should identify any material weaknesses, observations and best practices, recommendations, findings and corrective actions.

The Field Office, including FHEO staff, as appropriate, shall review the PHA's systems and test whether those systems are working by reviewing random samples of documents and files. **The review of Locked Checkpoints is required.** Field Offices are free to choose among the balance of the following topics, and add additional items as needed for their on-site reviews, based on risk assessment and professional judgment:

1. Review the status of the HOPE VI Locked Checkpoints and comment on any missed Locked Checkpoints or any Locked Checkpoints that are in danger of being missed. Specifically, the Locked Checkpoints that should be reviewed are:
 - Grant Agreement executed
 - Community and Supportive Service (CSS) Plan submitted to HUD
 - Revitalization Plan submitted to HUD
 - Development Agreement executed per phase
 - Mixed-Finance Proposal submitted to HUD per phase
 - Evidentiaries submitted to HUD per phase
 - Closing accomplished per phase
 - Construction started per phase
 - Construction finished per phase
 - Close-out Certification submitted to HUD
2. Review PHA inspection reports to determine whether the PHA or its Architect/Engineer (A/E) is routinely inspecting the revitalization activities to ensure that the physical work is being carried out in accordance with the plans and specifications. The Field office is also encouraged to review any Army Corps of Engineer reports, A/E inspections, lender reviews (especially if there are FHA credit enhancements), Developer reviews, and change orders, all of which can assist the Field Office in making a determination whether physical work is being carried out in accordance with the plans and specifications.
3. Inspect the physical work completed and in progress to ensure that the activities undertaken are consistent with the Revitalization Plan (including the approved budget and the development schedule) and are eligible activities.

4. Determine whether wages for physical work are in compliance with Davis-Bacon Act requirements, including the review of a random sample of HUD-11 Labor Standards forms for all classifications.
5. Review Certificates of Insurance for Professional/General Liability insurance to ensure that they are current and consistent with the provisions of the Master Development Agreement (MDA).
6. Review documentation maintained on file at the PHA in support of any changes to the Revitalization Plan and/or approved budget.
7. Review the procurement of professional services for compliance with requirements of 24 CFR part 85 and the MDA. Review for compliance with all other requirements for procurement and contract administration; change orders in excess of the HUD-established threshold; and sole-source procurements.
8. Review for compliance with HUD financial management and accounting requirements with respect to the PHA's internal controls for its HOPE VI program, including the proration and allocation of charges in accordance with its Cost Allocation Plan, and correction of pertinent deficiencies identified in annual fiscal audits. Field Offices are encouraged to review a sample of eLOCCS transactions on an annual basis to ensure that adequate documentation is being maintained for each draw; draws are being charged to the correct budget line item; draws are being made for eligible grant activities; and grant funds are being disbursed by the PHA to vendors within the three-day requirement.
9. Inspect evidence of resident and community involvement in accordance with the Grant Agreement and any Resident Consultation Plan, and is consistent with strategies outlined in the PHA's application for HOPE VI grant funding.
10. Review for compliance with other statutory and regulatory requirements for activities such as:
 - displacement and relocation activities for compliance with the PHA's Relocation Plan, Uniform Relocation Act, and CPD Notice 02-08 – Guidance on the Application of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, in HOPE VI projects;
 - real property acquisition;

- hazard abatement, including treatment of lead-based paint, asbestos, and other abatement issues during demolition/revitalization;
 - fair housing and equal opportunity requirements, including Section 3, in conjunction with FHEO staff;
 - administrative requirements of 24 CFR part 85 and OMB Circular A-87.
11. Review the PHA's progress in obligating and expending funds and completing the work set forth in the Revitalization Plan, program schedule and HOPE VI Locked Checkpoints, and assessment of additional need for monitoring.
 12. Review the PHA's progress in obtaining all leveraged funds and resources set forth in the approved Sources and Uses.
 13. Review the status of the PHA's management improvements and the impact of those improvements on the program.
 14. Review any completed evaluation reports by the entity identified in the HOPE VI application to determine whether the program is meeting its objectives, including physical improvements, community and supportive services, and impacts of the HOPE VI program activities on the boarder community.
 15. Review the PHA's accomplishments in carrying out Community and Supportive Services (CSS) programs, including those of sub-grantees and/or contractors. Assess adherence to federal regulations by obtaining and reviewing copies of:
 - Most recent HUD Approved CSS Work Plan, budget, vouchers and any implementation plan/schedule to ensure that services are being provided and goals are being met in accordance with the plan/schedule.
 - Relocation Plan, relocation files and resident tracking system to ensure that residents are being provided services regardless of the relocation options selected
 - Revitalization Plan relative to CSS, with any revisions.
 - CSS contracts and CSS subgrantee agreements for compliance with 24 CFP part 85 and to determine whether adequate contract administration is being conducted.

- Support documentation to verify compliance with funding match requirements of the appropriate NOFA and internal tracking systems to ensure that committed leveraged resources are actually being provided to CSS participants.
 - CSS Quarterly Report to assess program outcomes and any internal tracking systems to ensure that CSS program outcomes and goals are being achieved.
16. Review the PHA's compliance with occupancy regulations of existing HOPE VI residents prior to and during relocation. Also review Management Agent (private or PHA) adherence to Occupancy regulations, the Regulatory and Operating Agreement and the Management Agreement for HUD-assisted units in revitalized communities. The Field Office should pay special attention to ensure that screening is being completed consistent with the agreements, policies and procedures. Field Office staff should assess whether relocated families, who expressed a desire to return to the revitalized HOPE VI community, were in fact given an opportunity to come back to the site subject to the PHA's re-occupancy policies and procedures.
17. Review Management Agent's compliance with the maintenance portion of the management plan including compliance with the Uniform Physical Conditions Standards by inspecting completed, occupied units. (Information about the Uniform Physical Conditions Standards may be found on the REAC website at: <http://www.hud.gov/offices/reac/products/prodphas.cfm>)
18. Review PHA's compliance with required abatement of Exigent Health and Safety Violations identified during REAC inspections (both occupied HOPE VI and conventional public housing units).

The Field Office will prepare the report and email a copy of the draft report to the assigned Grant Manager who is given ten (10) working days to provide comments regarding the Locked Checkpoints and related language. (Please refer to Sample Locked Checkpoint and Sample Cost Allocation Plan Findings, Attachment C; and Sample Monitoring Review Reports, Attachments D, E, F and G.)

If at the end of ten (10) working days the Field Office has not received comments from the Grant Manager, the Field Office will assume that the report is satisfactory and the Field Office will issue it to the HOPE VI grantee.

Copies of the report should be sent to the assigned Grant Manager and to the Deputy Assistant Secretary of the Office of Public Housing Investments.

Monitoring Reports should document accomplishments and successes of the PHA, consultants, contractors, service providers and residents, as well as any deficiencies that need to be addressed. The Field Office Monitoring Review file must contain documentation of any deficiencies noted in the report. Special attention should be given to the results of any waivers of regulations and unique innovations that can be shared as “best practices”. Reports should present a balanced picture of the HOPE VI program, and should indicate if and how HOPE VI activities are making an impact on the community, as well as the Authority’s PHAS score.

The emphasis of monitoring reports should be to offer solutions to problems noted during the visit, provide technical assistance, and should identify corrective actions to be taken by the PHA, as well as any follow up actions that should be taken by the Field Office and/or Headquarters. To the extent possible, each recommendation and corrective action should have a specific target date for its accomplishment. Otherwise, one target date for response to the discoveries may be noted in monitoring report’s transmittal letter. If there are issues that warrant a recommendation to Headquarters for issuance of a Letter of Deficiency, Corrective Action Order, Letter of Warning, or Declaration of Default, the Field Office will prepare a memorandum to the Deputy Assistant Secretary of the Office of Public Housing Investments (with the concurrence of the assigned Grant Manager) outlining the deficiencies or material weaknesses and the documentation contained in the Field Office files to support that determination.

The following is a sample monitoring report outline:

- a. Summary of revitalization activities and sources of funding and funding commitments that have been received
- b. Status of HOPE VI Locked Checkpoints
- c. Relocation
- d. Homeownership
- e. Physical inspections (both construction and maintenance)
- f. Demolition, physical work and acquisition in progress and completed
- g. Exigent Health and Safety violations
- h. Contract administration and procurement
- i. Labor Relations compliance
- j. Financial management and administration Revitalization Plan approval/amendment issues
- k. Occupancy
- l. Community and Supportive Services
- m. Resident and Community Involvement
- n. FHEO requirements, including civil rights front end review
- o. Issues/Items for HUD follow up
- p. Summary of Recommendations, Findings & Corrective Actions
- q. Open issues from prior reviews
- r. Environmental Review

C. Off-Site Monitoring

In addition to the one or more formal on-site monitoring reviews each year, Field Offices shall be alert and sensitive at all times to progress and problems associated with the PHA's HOPE VI program. Any need for assistance shall be responded to at once. On-going information can be obtained by taking the following actions:

1. Review HOPE VI Quarterly Performance and Budget Progress Reports, with emphasis on adherence to Locked Checkpoint data.
2. Review LOCCS drawdowns/status
3. Attend regular meetings with PHA staff.
4. Attend HOPE VI progress meetings at the PHA.
5. Attend resident council meetings when requested.
6. Meet with consultants, contractors, sub-grantees, and service providers.
7. Participate in on-site technical assistance by HUD-funded consultants.
8. Monitor media coverage of the local HOPE VI program.
9. Review complaints from contractors, residents, community organizations, and others.
10. Represent HUD as observer to the PHA's interviews and selection of consultants and contractors through competitive selection proceedings.
11. Review the PHA's allocation of personnel costs and other administrative expense among available funding sources; budgets, financial statements and reports received from the PHA on other programs and grants.
12. Review audit reports and the PHA's actions to resolve any audit findings or deficiencies.
13. Communicate with other program divisions in the Field Office and/or HUB concerning their interaction with the PHA.
14. Participate in weekly HOPE VI staff meetings led by the Director of the Office of Urban Revitalization.
15. Discussions with the Grant Manager or Director of the Office of Urban Revitalization.