
Section 504 Procedures For Recipients of HOME Program Funds

Virginia Department of Housing and Community Development

OVERVIEW

As a HOME participating jurisdiction (PJ), DHCD and the entities to which it provides HOME funds must comply with Section 504 of the Rehabilitation Act of 1973, as part of their housing initiatives. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. Section 794) prohibits discrimination on the basis of disability in federally assisted programs and activities.

These procedures summarize the Section 504 requirements and describe how DHCD implements them. They outline what DHCD and its housing partners must do to comply with Section 504, and identify the related recordkeeping and reporting requirements.

These procedures refer to “HOME funds,” since this guidance is provided to HOME recipients. Section 504 applies to a number of other HUD programs as well. Additional resources about Section 504 and related fair housing requirements are referenced below and in the Exhibit attached to this procedure.

Resources on Section 504

- 24 CFR Part 8 – Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development:
www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR&searchPath=Title+24%2FSubtitle+A%2FPart+8&oldPath=Title+24%2FSubtitle+A%2FPart+8%2FSubpart+D&isCollapsed=false&selectedYearFrom=2012&ycord=1625
- Key Provisions and Regulations Implementing Section 504 of the Rehabilitation Act
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunities/disabilities/504keys
- Notice CPD-05-09, Accessibility Notice: Section 504 of the Rehabilitation Act of 1973 and The Fair Housing Act and their applicability to housing programs funded by the HOME Investment Partnerships Program and the Community Development Block Grant Program
www.hud.gov/offices/cpd/lawsregs/notices/2005/05-09.pdf
- Uniform Federal Accessibility Standards (“UFAS”)
www.access-board.gov/ufas/ufas-html/ufas.htm
- HUD Fair Housing and Equal Opportunity Frequently Asked Questions on How Section 504 Applies to Common Situations
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opportunities/sect504
- Uniform Accessibility Standards (“UFAS”) Checklist:
<http://www.hud.gov/offices/fheo/library/UFASAccessibilityChecklistforPHAs-5-7-08.pdf>

SUMMARY OF THE SECTION 504 REQUIREMENTS

The Section 504 regulations identify who is subject to the Section 504 requirements, to what projects these requirements apply, and what requirements apply. The Section 504 implementing regulations are found at 24 CFR Part 8.

Who Is Subject to Section 504?

DHCD and all the entities that receive HOME funds (and/or other HUD funds to which Section 504 applies) from DHCD are subject to the 504 requirements. This includes DHCD's state recipients, contractors, subcontractors, developers (including community housing development organizations), owners, and sponsors.¹

Program beneficiaries are not subject to the Section 504 requirements. For instance:

- A family that receives CDBG or HOME funds for the rehabilitation of an owner-occupied unit is a beneficiary, and is not subject to Section 504.
- A family that receives down payment assistance for homes using HOME funds provided by DHCD is also a beneficiary and therefore not subject to Section 504.

Program Accessibility Requirements for New Construction and Rehabilitation Activities

Section 504 applies to certain new construction and rehabilitation projects, as follows:

New construction

New construction of multifamily rental housing with five or more units must be designed and constructed to be readily accessible to and usable by persons with disabilities. The common areas in the building must be made accessible, as well as a certain number of units:

- A minimum of 5 percent of the dwelling units in the project (but not less than one unit) must be accessible to individuals with mobility impairments.
- An additional 2 percent of the dwelling units (but not less than one unit) must be accessible to individuals with sensory impairments (i.e., hearing or vision impairments).

HUD reserves the right to prescribe a higher number pursuant to 24 CFR 8.22(c). The requirements for new construction multifamily housing are found at 24 CFR 8.22(a).

Rehabilitation: Substantial alterations

Multifamily rental projects of fifteen units or more that undergo "substantial alterations" must also comply with Section 504's accessibility requirements. Rehabilitation activities are considered "substantial alterations" when the costs of rehabilitation will be 75 percent or more of the replacement cost of the completed facility. For these projects, again, the common spaces must be made accessible as well as the same number of units required for new construction:

- A minimum of 5 percent of the dwelling units in the project (but not less than one unit) must be accessible to individuals with mobility impairments.

¹ Any "recipient" of HUD funds to which Section 504 applies is subject to these requirements. The regulations, at 24 CFR 8.3, define "recipient" as any State or its political subdivision, any instrumentality of a State or its political subdivision, any public or private agency, institution, organization, or other entity, or any person to which Federal financial assistance is extended for any program or activity directly or through another recipient, including any successor, assignee, or transferee of a recipient, but excluding the ultimate beneficiary of the assistance. An entity or person receiving housing assistance payments from a recipient on behalf of eligible families under a housing assistance payments program or a voucher program is not a recipient or subrecipient merely by virtue of receipt of such payments."

- An additional 2 percent, at a minimum (but not less than one unit), must be accessible to individuals with sensory impairments.

The requirements for multifamily projects undergoing substantial alterations are found at 24 CFR 8.23(a).

Rehabilitation: Other Alterations

For rehabilitation of multifamily rental projects that do not meet the definition of substantial alterations, the alterations that are made must, to the maximum extent feasible, make the dwelling units accessible to and usable by individuals with mobility impairments. Further, if alterations of single elements or spaces of a dwelling unit, when considered together, amount to an alteration of a dwelling unit, then the entire dwelling unit shall be made accessible to persons with mobility impairments. (This would include alterations that involve certain kitchen and bathroom renovations, as well as entrance door jamb replacements.) In addition, alterations to common spaces must make those areas accessible, to the maximum extent feasible.

When a minimum of 5 percent of the dwelling units (but not less than one unit) are accessible to people with mobility impairments, no additional units are required to be made accessible. For this category of rehabilitation, there is no requirement to make any units accessible to individuals with sensory impairments.

HUD reserves the right to prescribe a higher number pursuant to 24 CFR 8.23(b)(2).

A recipient is not required to make these accessibility alterations if doing so would impose undue financial **and** administrative burdens on the operation of the multifamily housing project (24 CFR 8.23(b)).

Homeownership Program Requirements

At the date of the writing of these procedures, May of 2013, DHCD does not provide HOME funds for the construction of new homes for the purpose selling a property to a homebuyer. If there is a change in that policy, then any housing units newly constructed or rehabilitated for purchase or single family (including semi-attached and attached) units to be constructed or rehabilitated in a program or activity receiving HOME funds shall be made accessible upon request of the prospective buyer if the nature of the handicap of an expected occupant so requires. In such case, the buyer shall consult with the seller or builder/sponsor regarding the specific design features to be provided. If accessibility features selected at the option of the homebuyer are ones covered by the standards prescribed by 24 CFR Part 8.32, those features shall comply with the standards prescribed in 24 CFR Part 8.32. The buyer shall be permitted to depart from particular specifications of these standards in order to accommodate his or her specific handicap. The cost of making a facility accessible under this paragraph may be included in the mortgage amount within the allowable mortgage limits, where applicable. To the extent such costs exceed allowable mortgage limits, they may be passed on to the prospective homebuyer, subject to maximum sales price limitations.

What Standard of Accessibility Applies?

Units and common spaces made accessible for purposes of Section 504 must comply with the Uniform Federal Accessibility Standards (UFAS) of accessibility. For copies of UFAS, please refer to the link on page 2 above, "Section 504 Resources."

Are There Additional Requirements Related to Program Accessibility?

Section 504 covers all programs, services, and activities of recipients of HUD financial assistance, including HOME funds. This means that recipients are required to ensure equal access *in all aspects of program delivery*, including:

- Outreach and public contact, including contact with program applicants and participants
- Eligibility criteria
- Application process
- Admission to the program
- Tenancy, including eviction
- Service delivery
- Employment policies and practices.

At a minimum, the recipient must ensure that all offices open to the public are accessible to persons with mobility impairments, and communication systems and sign language interpreters are made available, as needed.

Section 504 Coordinator – 15 Employees or more

Recipients with 15 or more employees must designate an employee to ensure the recipient's programs, services and activities meet the requirements of Section 504, and adopt a grievance procedure to effect due process standards and prompt and equitable resolutions of complaints.

Self-Evaluation

HUD encourages all recipients to conduct and regularly update a self-evaluation of their policies and practices to determine if they are consistent with the law's requirements.² Recipients should make every effort to involve persons with disabilities, as well as organizations that represent persons with disabilities, and agencies or other experts who work regularly with accessibility standards in the self-evaluation process. This ensures the evaluation yields the most meaningful result for both the recipient and for persons with disabilities who participate in the programs and activities.

A self-evaluation should include the following steps:

- Evaluate current policies and practices and analyze them to determine if they adversely affect the full participation of individuals with disabilities in programs, activities, and services. Be mindful of the fact that a policy or practice may appear neutral on its face, but may have a discriminatory effect on individuals with disabilities.
- Modify any policies and practices that are not or may not be in compliance with Section 504 regulations.
- Take appropriate corrective steps to remedy those policies and practices which either are discriminatory or have a discriminatory effect. Develop policies and procedures by which persons with disabilities may request a modification of a physical barrier or a rule or practice that has the effect of limiting or excluding a person with a disability from the benefits of the program.

HUD also recommends that recipients periodically update the self-evaluation, particularly, for example, if there have been changes in recipient owned housing stock, such as demolition of housing units and construction and/or alteration of housing, or changes in the programs and services of the agency.

² Self-evaluations were initially required when the Section 504 requirements were first implemented. Although no longer a requirement, regular self-evaluation is considered a best practice.

Accessibility Requirements of the Fair Housing Act

There are additional requirements related to accessibility that are imposed by the Fair Housing Act of 1988, as amended. These requirements apply to privately- and publically-funded new construction.

The accessibility and adaptability requirements of the Fair Housing Act apply to new construction projects with four or more dwelling units that is built for first occupancy after March 13, 1991.

The accessibility requirements of the Fair Housing Act are not as strict as the UFAS (for Section 504 units). A unit that meets the accessibility requirements of the Fair Housing Act will not have as great a degree of accessibility as a UFAS-complying unit, but it may be easily adapted to be fully accessible without significant costs and the need to do significant structural modifications.

The Fair Housing Act's accessibility requirements apply to a broader number of dwelling units. Under the Fair Housing Act's new construction requirements, if the building has an elevator, **all of the dwelling units** must meet the Fair Housing Act's design and construction requirements; if there is no elevator, all of the ground floor dwelling units must meet the Fair Housing Act's requirements.

More information on the Fair Housing Act may be obtained by going to HUD's web page for *Persons with Disabilities*. A Fair Housing Act Design Manual is available from the HUD Distribution Center at 1-800-767-7468, or online at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/fhfhag.

DHCD SECTION 504 PROCEDURES FOR HOME PROGRAM RECIPIENTS

DHCD has established the following procedures to ensure that its recipients of HOME funds comply with the federal Section 504 requirements.

For purposes of these procedures, a **HOME administering entity** includes an entity that receives HOME funds from DHCD to administer a rehabilitation or new construction program or project. This is typically a local government (known as a "state recipient") or nonprofit organization ("subrecipient"). A **HOME recipient** includes **any** entity that receives HOME funds from DHCD – directly, or indirectly through other entities -- that are subject to Section 504 requirements. This includes the local government state recipients, nonprofit subrecipients, as well as developers, owners, and sponsors. The below procedures are primarily focused on the areas of Section 504 about Employment, Program Accessibility, and Enforcement. More detailed information is available through reading 24 CFR Part 8.

Employment

1. Each HOME administering entity and recipient must take steps to ensure that employment activities, including job announcements, recruitment, interviews, hiring, work assignments, promotions and dismissals, do not discriminate on the basis of disability. Upon request, the HOME administering entity and recipient must provide reasonable accommodations for employees that may be in need of modifications in order to perform their work functions.

Program Accessibility

1. DHCD and recipients shall take steps to ensure effective communication with applicants, beneficiaries, and members of the public about pertinent provisions about Section 504.
2. DHCD shall take steps to operate existing housing programs in a manner that does not discriminate on the basis of disability. Further, DHCD shall take steps, as needed, to ensure that its housing programs are readily accessible to and usable by persons with disabilities. These steps might include: making information available in Braille, providing sign language interpreters as needed, or making other such accommodations to ensure all persons are aware of housing program opportunities. DHCD shall develop and implement a transition plan to assure compliance until such time as permanent modifications to program information is fully implemented.
3. DHCD and recipients must provide reasonable accommodations which may be necessary for a person with a disability to use or participate in a program, service, or activity. (Such accommodation is not required if the recipient can demonstrate to DHCD's satisfaction that the accommodation will result in an undue financial and administrative burden or a fundamental alteration in the nature of the program, service or activity.)

A reasonable accommodation is an adaptation or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Reasonable accommodations may include, but are not limited to, adjustments or modifications to buildings, facilities, dwellings, and may also include provision of auxiliary aids, such as readers, interpreters, and materials in accessible formats.

4. Each HOME administering entity that receives HOME funds to administer rehabilitation or new construction programs must comply with Section 504 requirements in its own operations and must ensure compliance by its contractors and subcontractors. DHCD will notify these entities of their obligations in the Requests for Proposals for new projects, in funding agreements with applicants, and in periodic correspondence during the compliance period with the owners of HOME-assisted properties.
5. For development activities funded by DHCD, the following steps apply to project owners, developers and sponsors:
 - a. Applicants for funding of new construction or rehabilitation of a multifamily property must determine to what extent the Section 504 requirements apply.
 - b. Upon project approval, DHCD will confirm and define its applicability and determine the number of units that must be made accessible, if any.
 - c. Project owners, developers, or sponsors will be required to submit detailed plans and specifications that demonstrate compliance with these requirements. They are encouraged to secure architects that are familiar with the UFAS.
 - d. DHCD will review plans and specifications to verify:
 - I. Compliance with applicable provisions for mobility accessible and vision and/or hearing accessible units
 - II. Ensure that accessible dwelling units are located throughout projects and sites, and are available in the same ranges of sizes and amenities to dwelling units available to persons without disabilities.
 - e. DHCD will conduct progress inspections during construction to ensure that units are built as specified.

- f. DHCD will continue to monitor / inspect units to ensure continued maintenance of the required accessible units throughout the affordability period.
6. Recipients that are owners must ensure that property managers provide effective communication at the property as needed. This may include providing a qualified sign language and oral interpreter, reader, use of tapes, Braille materials, and other forms of communication that may be necessary in the operation of a property.
 7. Each recipient/owner must submit a Management Plan to DHCD that details the property management agent's plan to operate the property. The Plan shall include:
 - a. An Affirmative Fair Housing Marketing plan that, among other things, specifies the reasonable, nondiscriminatory steps that will be taken to make sure that accessible units that become available are offered first to persons with disabilities who require the accessibility features. At a minimum, the plan shall specify that when an accessible unit becomes vacant, regardless of the status of the waiting list, the owner/manager shall:
 - I. First, the unit must be offered to a current occupant of the property who might require or benefit from the accessibility feature(s) of the unit;
 - II. Second, the unit must be offered to an eligible, qualified applicant on the waiting list who requires the accessibility feature(s) of the unit; and
 - III. Last, the unit can be offered to a non-disabled person on the waiting list.
 - b. The waiting list policy.
 - c. Information about how to file a complaint with the management agent, DHCD, and HUD.
 - d. A written grievance procedure to resolve complaints alleging discrimination based on disability, as required by Section 8.53(b).
 8. DHCD will provide a copy of Addendum B to form HUD-9834, *Checklist for On-Site Limited Monitoring and Section 504 Reviews to the Owners* of rental housing properties where Section 504 provisions are applicable. The Owner shall be instructed to provide this Addendum to the applicable property manager as a means of communicating the on-going monitoring of the applicable provisions of Section 504 in the operation of the rental housing development. The owner shall submit a copy of the pertinent compliance provisions related to Section 504 as included in form HUD 9834.
 9. Recipients shall pay for a reasonable accommodation needed by the individual (e.g., a ramp to a unit) unless providing that accommodation would be an undue financial and administrative burden or a fundamental alteration of the program. During the development phase, these costs are eligible HOME costs.
 10. Recipients that that receive HOME funds and that employ 15 or more employees must designate a Section 504 Coordinator, who is responsible to ensure compliance with Section 504.

Enforcement

1. The Section 504 Coordinator (for recipients with 15 or more employees) shall:
 - a. Ensure the recipient's programs, services and activities meet the requirements of Section 504
 - b. Adopt a grievance procedure to effect due process standards and prompt and equitable resolutions of complaints

- c. Ensure that participants, beneficiaries, applicants, and employees are notified of the recipient's nondiscriminatory provisions.
2. DHCD and its recipients shall maintain records and reports of efforts to meet the requirements of Section 504, and keep these records on file so that they are available if a complaint is filed, or if HUD conducts a compliance review.
3. Persons with disabilities who believe they have been subjected to discrimination prohibited by Section 504 should file a complaint with DHCD and/or HUD.
4. Any person who believes that any specific class of persons has been subjected to discrimination prohibited by Section 504 and who is a member of that class or who is the authorized representative of a member of that class may file a complaint with the DHCD and/or HUD. To file a complaint, contact:

VA Department of Housing and Community Development
Main Street Centre
600 East Main Street, Suite 300
Richmond, VA 23219
Phone: (804) 842-2610
Email: Director@dhcd.virginia.gov
Fax: (804) 371-7090
TTY: (Insert- need from DHCD)

HUD Richmond Field Office
600 East Broad Street, Third Floor
Richmond, VA 23219-4920
Phone: (800) 842-2610
Email: Customer Service
Fax: (804) 822-4984
TTY: (804) 771-2038

EXHIBITS TO SECTION 504 PROCEDURES

Exhibit 1: Form HUD 9834 (rev. 11/12): **Management Review for Multifamily Housing Projects**
http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/forms/hud9a

PURPOSE: To assess management and oversight of multifamily housing projects.

INSTRUCTIONS: This form is to be completed by HUD staff, Performance Based Contract Administrators (PBCA), Traditional Contract Administrators (CAs) and Mortgagees of Coinsured Projects (Mortgagees). The Management Review form consists of three parts: Desk Review, On-site Review with Addenda, and Summary Report. All reviewers of subsidized projects must complete Addenda (A, B, C, & D). Reviewers of unsubsidized projects must complete Addenda B & C only. If any questions on any given form are not relevant to the program under review or if the information is not available, notate with "N/A". FHEO staff provide MFH staff a list of requests for documents and special observations each year. Additional guidance regarding the management process can be found in HUD Handbooks 4350.1, REV-1 and 4566.2.

A. Prior to On-Site Review

Complete Part I – Desk Review

- To complete the Desk Review worksheet prior to the on-site visit, review the project files, system reports, and other documents, and contact the HUD representative for any unavailable information needed to complete the desk review. Fair Housing/Civil Rights review requirements are all in Addendum B. This portion of the review will assist the reviewer in identifying potential problem areas. Owner must complete Addendum B, Part A, and send it to Multifamily Housing. HUD staff must complete the entire Desk Review for subsidized projects. For unsubsidized projects, HUD staff/mortgagees must complete all applicable sections. CAs must complete the entire Desk Review except where noted "This question applies only to HUD Staff/Mortgagees."
- Schedule a date for the on-site review with the owner/agent and confirm the review date in writing. The owner/agent should be given at least a two-week notice in writing and notified of the documents that need to be available the day of the review, as specified in Addendum C. Addendum C provides a list of documents notated by the reviewer that the owner/agent must have available during the on-site review. Addendum C and Part A of Addendum B must be forwarded to the owner/agent with the letter confirming the scheduled on-site review. The reviewer may request additional items as necessary.

B. Conducting the On-Site Review

Complete Part II – On-Site Review

- On-Site Reviews will be completed as follows:
 - (1) HUD staff and Mortgagees must complete all applicable questions in Part II.
 - (2) CAs must complete all questions in Part II except where noted "This question applies only to HUD staff/Mortgagees."
 - (3) HUD staff completing a review of a project which is also reviewed by a CA will only complete questions not applicable to CAs.
- In accordance with Part D, bring back all information requested by FHEO.
- Use additional sheets as necessary to complete applicable questions.
- Upon completion of the on-site review, the reviewer will hold a close-out session with the owner/agent to discuss observations and conclusions.

C. After On-Site Review

- The reviewer will record deficiencies, findings and corrective actions. Findings must include the condition, criteria, cause, effect and required corrective action. The condition describes the problem or deficiency. The criteria should cite the statutory, regulatory or administrative requirements that were not met. The cause explains why the condition occurred. The effect describes what happened because of the condition. The corrective action provides what the owner/agent must do to eliminate the deficiency. The corrective action must include a requirement that the owner determine and correct not only the discovered errors and omissions, but also describe to the reviewer how and what systems, controls, policies and procedures were adjusted or changed to assure that the errors and omissions do not reoccur. In completing the Report of Findings, the reviewer should also indicate the target completion date.
- The reviewer retrieves Addendum B and forwards the completed form to FHEO, along with the approved initial or updated Affirmative Fair Housing Marketing Plans in accordance with "General Operational Procedures for the Civil Rights Front-End and Limited Monitoring Reviews of Subsidized Multifamily Housing Projects", which may be found on FHEO's web site.
- Complete Summary Report as follows:

Based on the Report of Findings, the reviewer will assess the overall performance for each applicable category. The reviewer must indicate **A** (Acceptable) or **C** (Corrective action required) and include target completion dates (TCD) for all corrective action items. For those items not applicable, indicate "N/A" in the TCD column.

For each of the seven major categories (*A, B, C, D, E, F, and G*), rate each category by entering a score between 1 and 100. If a category was not reviewed, enter a score of zero (0). After rating the individual categories, an overall rating must be assessed. This rating will be based upon the ratings assigned in categories A through G. CAs will rate all categories except Category D. Category D is for HUD staff and Mortgagees only. Additional guidance for ratings can be found in HUD Handbook 4350.1, REV-1.
- Distribute the Summary Report and cover letter as follows:
 - (1) Project Owner (original)
 - (2) Management Agent (copy)
 - (3) HUD office for PBCA reviews rated below average or unsatisfactory
 - (4) HUD office for all traditional CA reviews

*A copy of the completed Management Review Report, form HUD-9834 and supporting documents must be maintained in the project file.
- If a below average or unsatisfactory rating is determined, the owner/agent must be afforded an opportunity to appeal. Guidance on appeal procedures is provided in HUD Handbook 4350.1, REV-1.
- All Secure Systems users must document all required data in the Integrated Real Estate Management System (iREMS).

D. Management Review Deficiency Follow up:

- Reviewer must conduct follow-up activity until all corrective actions as required in the Summary Report have been completed. Enter applicable close-out dates in iREMS.
- Housing reviewers will forward all completed FHEO checklists and attachments to FHEO within five (5) business days of their own on-site reviews or within 5 business days of receipt of the checklists from the CA, as applicable. Follow-up instructions may be found on FHEO's web site.

NOTE: The Fair Housing and Equal Opportunity (FHEO) checklist has been included as part of this management review form; however no determination of compliance with applicable Fair Housing laws and regulations is included in the summary report. CAs must forward the original checklist (Addendum B) to HUD staff. HUD staff must maintain the original checklist in the project file and forward a copy to the Office of FHEO in the appropriate jurisdiction for review.

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 02/28/2015

Summary

Date of On-Site Review:	Date of Report:	Project Number:	Contract Number:
Section of the Act:	Name of Owner:	Project Name:	Project Address:
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR	Type of Housing: <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized <input type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. ___ is 10% of the overall score. This category is rated ____
1. General Appearance	<input type="checkbox"/>	<input type="checkbox"/>		
2. Security	<input type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. ___ is 10% of the overall score. This category is rated ____
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. ___ is 10% of the overall score. This category is rated ____
5. Maintenance	<input type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input type="checkbox"/>		
7. Energy Conservation	<input type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. ___ is 25% of the overall score. This category is rated ____
8. Budget Management	<input type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. ___ is 25% of the overall score. This category is rated ____
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input type="checkbox"/>		
15. Leases and Deposits	<input type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input type="checkbox"/>		
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. ___ is 10% of the overall score. This category is rated ____
23. Tenant Concerns	<input type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	Enter a score between 1 and 100 for the General Management Practices Rating. If this Section was not reviewed, enter 0. ___ is 10% of the overall score. This category is rated ____
25. General Management Operations	<input type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input type="checkbox"/>	<input type="checkbox"/>		

Overall Rating: Superior Above Average Satisfactory Below Average Unsatisfactory ___ Overall Score:

To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.

Name and Title of Person Preparing this Report: (Please type or print):

Name and Title of Person Approving this Report: (Please type or print):

Signature: _____

Signature: _____

Date: _____

Date: _____

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only.

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 02/28/2015

Summary

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____
_____		_____

Part I Desk Review

PART I. DESK REVIEW –The reviewer must complete this section **prior** to the on-site review using all relevant information in project files and HUD database systems. Questions on the desk review, which include category references, are linked to the on-site review. Category references on the desk review that relate to the on-site review must be considered when determining the category rating. Category references are marked following the applicable question (i.e. B3, E14).

If any questions on any given form are not relevant to the program under review or if the information is not available notate with “N/A”.

1. What is the most recent Physical Assessment Subsystem (PASS) score? **B3**

Enter PASS Score ____ Date of REAC inspection ____

If required, has the project filed a certification that all items listed on the previous REAC inspection have been completed?

Yes No

If more than one inspection is of record, does the reviewer note repetitive defects?

Yes No

Comments:

2. Were Exigent Health and Safety (EH&S) conditions cited in the report? **B3**

Yes No N/A

Comments:

3. Have all latent defects been corrected? *This question applies only to newly constructed projects within the last 24 months. This question applies only to HUD Staff and Mortgagees.*

Yes No N/A

If not, list depository and amount of any construction escrows remaining. ____

Comments:

Questions 4 through 6 only apply to subsidized family properties or elderly properties housing children under the age of six that were constructed prior to 1978. If the lead based paint inspection has been conducted and the information was documented on a previous management review, proceed to question 7.

4. Document the year of construction for Lead-Based Paint compliance.

Obtain this information from the Physical Condition/PASS screen in iREMS. Open the REAC Inspection Report, then open the PASS Physical Inspection Report. The year of construction can be found under Buildings/Units.

Date of Construction ____ **If construction occurred after 1977, proceed to question 7.**

5. Has a lead-based paint inspection been conducted? **4B**

Yes No Information Not Available

Comments:

6. What were the results of the Lead-Based Paint Inspection/Evaluation: **4B**

Was lead found? Yes No N/A

If yes, is there a HUD approved lead hazard control plan? Yes No N/A

Comments

7. Is an Annual Financial Statement required? (If no, proceed to question 10).

Yes No

This question applies only to HUD Staff.

Comments:

8. What was the most recent Financial Assessment Subsystem (FASS) score? Score ____

This question applies only to HUD Staff

If financial reporting is not required, determine why; and record the reason in reviewer comments below.

Comments:

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Desk Review (Continued)

9. Have the following reports been consistently submitted on a timely basis? (Look at multiple periods) Check the appropriate box for reports received, and indicate whether or not the report was received timely.

This question applies only to HUD Staff and Mortgagees

- Annual Audited Financial Statement Yes No N/A
 Date last report was due: _____
 Date last report received: _____
 - Monthly Accounting Report Yes No N/A
 - Excess Income Report (HUD-93479, 80, 81) Yes No N/A
 - Quarterly performance report for projects on flexible subsidy, modification, workout, etc. Yes No N/A
 - Annual operating budget (cooperatives) Yes No N/A
- If the reports have been submitted, were they received in acceptable form? Yes No

Comments:

10. Has the owner corrected all findings on HUD financial and/or Inspector General audits? Yes No N/A

This question applies only to HUD Staff and Mortgagees.

List findings outstanding and determine whether remedial action is required to assure correction within established goals:

Comments:

11. Do project operating expenses appear reasonable compared with similar projects? Yes No

This question applies only to HUD Staff. D10

Indicate latest OPIIS rating and check problem areas flagged by OPIIS.

- Administrative
- Maintenance
- Utility
- Taxes and Insurance
- Financial

Also, use OPIIS to conduct an expense comparison with other similar projects.

Comments:

12. Does annual financial analysis or FASS printouts indicate that project is free of actual or potential financial problems? Yes No

This question applies only to HUD Staff.

For each of last 3 years, enter Profit (Loss) before depreciation (from the Statement of Profit & Loss).

Year	_____	\$	_____
	_____	\$	_____
	_____	\$	_____

Comments:

13. If the owner/agent has taken unauthorized distributions, reimbursements, or supervision fees, have these been repaid? Yes No

This question applies only to HUD Staff and Mortgagees.

If no, indicate amount due to the project. \$ _____

14. If applicable, have all deposits due to the residual receipts fund been made? Yes No

This question applies only to HUD Staff.

Comments:

15. Based on the last FASS submission, are accounts payable reasonably current? Yes No

This question applies only to HUD Staff and Mortgagees. D12

Indicate the amount of accounts payable more than 60 days old \$ _____

Comments:

Desk Review (Continued)

16. Does the balance in the security deposit trust account equal or exceed the project's liability account? **Yes** **No**
This question applies only to HUD Staff and Mortgagees.

If no, explain how deficit will be funded.

Comments:

17. If security deposits are invested in an interest-bearing account, is interest passed through to tenants or transferred to project account?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

Comments:

18. Have the owner and managing agent executed and submitted an appropriate Management Certification (form HUD-9839A, B, or C) to HUD?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

If yes, please enter date of certification. _____

Determine that the content of certification is consistent with present operations.

Comments:

19. Is the management fee paid to the agent in accordance with the Management Certification?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

Comments:

20. Has the owner and management agent executed a management agreement in accordance with the management certification?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

Comments:

21. Does the management agreement reflect HUD's regulations and guidelines?
This question applies only to HUD Staff and Mortgagees. **Yes** **No** **N/A**

Comments:

22. Has a management entity profile been submitted to HUD?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

If yes, is it relevant to the agent's organization and how it operates? **Yes** **No**

Date of the management entity profile _____

23. Do the Management Entity Profile and Management Certifications clearly describe the relationships and responsibilities of the owner and agent?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

Determine if management is by an identity-of-interest contractor, and compare the contract arrangement to the annual financial report.

Comments:

24. Have the principals and board members listed received HUD-2530 approval?
This question applies only to HUD Staff. **Yes** **No** **N/A**

Request a list of all current principals and board members and check for HUD-2530 approval.

Comments:

25. Is the agent charging the project for expenses which the agreement requires the agent to pay?
This question applies only to HUD Staff and Mortgagees. **Yes** **No**

Comments:

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Questions 26 –29 apply to OAHF restructuring. If not applicable proceed to question 30.

26. Has the project’s mortgage been restructured? Yes No
This question applies only to HUD Staff.
If yes, is there a use agreement on the project? Yes No
If there is a use agreement, does it require any owner certifications? Yes No
If owner certifications are required, have they been submitted timely? Yes No
If applicable, has work required under the Rehabilitation Escrow been/is being completed according to schedule? Yes No

Comments:

27. Is the owner eligible for incentives? Yes No
This question applies only to HUD Staff.
If yes, has the owner calculated those incentives correctly? (i.e., Capital Recovery Fee (CRF) and/or Incentive Performance Fee (IPF)) Yes No

Comments:

28. Does the HUD billing statement (HUD-92771) indicate timely and accurate payments toward the Mortgage Restructuring Note? Yes No
This question applies only to HUD Staff.

Comments:

29. If an owner is in non-compliance with HUD business agreements, has the owner been notified by HUD within the required timeframes? Yes No
This question applies only to HUD Staff

Comments:

Questions 30 through 33 apply to Section 236 projects. If this is not a Section 236 project proceed to question 34.

30. Does the rental income generate excess income? Yes No N/A
This question applies only to HUD Staff.

Comments:

31. Has the owner/agent received approval to retain excess income? Yes No
This question applies only to HUD Staff. D13

Comments:

32. Was an annual report submitted for usage of retained excess income? Yes No
This question applies only to HUD Staff. D13

Comments:

33. Are there any delinquent excess income payments due HUD? Yes No
This question applies only to HUD Staff. D13

If yes, is there a payment plan? Yes No

Comments:

34. Are rent increase requests submitted to HUD promptly when needed? Yes No
This question applies only to HUD Staff.

Review the timing of the last three rent increase requests and the results of the requests (approval, denial or modification to requested amount), and whether the rents are comparable to other neighboring properties. If a wide disparity exists, determine the cause of the difference.
Does owner/agent generally provide sufficient documentation for rent increases? Yes No

Comments:

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Desk Review (Continued)

35. If approval is required, are rent increase requests submitted promptly? **Yes** **No** **N/A**

Comments:

36. Complete chart below. *(This question applies only to HUD Staff/Mortgagees)*

Name of Reserve	As of			Held in Interest Bearing Account?	
	Total	Per Unit	Monthly Deposit	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Replacement Reserve	\$	\$	\$	Yes <input type="checkbox"/>	No <input type="checkbox"/>
General Operating Reserve (Co-ops)	\$	\$	\$	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Residual Receipts	\$	\$	\$	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Other	\$	\$	\$	Yes <input type="checkbox"/>	No <input type="checkbox"/>

a. Do balances in replacement or general operating reserve accounts appear adequate to meet future needs? **Yes** **No**

If not, what action is recommended? _____

b. Are repairs consistently paid from the appropriate operating expense account, and eligible items reimbursed from the reserves? **Yes** **No**

Comments:

37. Has the owner/agent performed an analysis to determine future Reserve for Replacement needs when submitting a budget based rent increase? **Yes** **No**

Comments:

38. If there is a utility allowance, what was the effective date of last utility allowance adjustment? _____

What was the date of approval? _____

If a utility allowance was approved was it implemented in accordance with HUD guidelines? **Yes** **No**

Comments:

39. What is the effective date of the last rent adjustment? _____

Comments:

40. Is the current approved rent schedule sufficient to meet project needs? **Yes** **No**

This question applies only to HUD Staff.

Comments:

41. Has a special rent increase been approved? **Yes** **No** **N/A**

If yes, please check the appropriate box. Insurance Taxes Utilities Security Service Coordinator

Comments:

42. Are monthly rental subsidy vouchers submitted on time? **Yes** **No** **N/A**

Comments:

43. Is the owner/agent submitting tenant certification data to TRACS to support the voucher billings? **Yes** **No** **N/A**

Comments:

44. Is the owner/agent transmitting data for Section 236 and Section 221(d)(3) BMIR tenants to TRACS as required by the automation rule? **Yes** **No** **N/A**

Comments:

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45. What is the term of the subsidy contract? _____ Date the contract term ends: _____

Comments:

46. List vacancy activity for the past twelve months, and indicate the number for each month. **C6.**
This information can be obtained from the TRACS Voucher Detail Summary.

JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC

47. Does review of the EIV reports listed below include information that needs a resolution or explanation by the owner/agent? **E18b**

- Income Discrepancy Report? Yes No
- New Hires Report Yes No
- Failed EIV Pre-Screening Report? Yes No
- Failed Verification Report (Failed the SSA Identity Test)? Yes No
- Deceased Tenant Report? Yes No
- Multiple Subsidy Report? Yes No

Comments:

48. Is there a Neighborhood Networks Center for the project? (Check iREMS or other available source) Yes No N/A
If no, answer "N/A" and proceed to 50.

Comments:

49. If yes to question 48, does the Neighborhood Networks Center have a Strategic Tracking and Reporting Tool (START) Business Plan? Yes No

- If yes, date HUD approved: _____
- If no, when will a START Business Plan be completed? _____
- Projected date for START Business Plan: _____

Comments:

50. Are there any unresolved findings from previous management reviews? If yes, specify in the comments section. Yes No

Comments:

51. Review complaints, congressional inquiries, etc. received within the last 12 months regarding the overall management practices.
Provide a general description below and attach applicable documentation. **G25**

Issue/Complaint	Status

Part II On-Site Review

Indicate by marking the appropriate box - Yes, No, or N/A if not applicable. Provide comments as needed.

CATEGORY A. GENERAL APPEARANCE & SECURITY

1. General Appearance

Based on observation, are the project's exterior and common areas (i.e., grounds, landscaping, parking lots, playgrounds, hallways, laundry room, elevator, garbage area, stairwells, management office) clean, free of graffiti, debris and damage? Yes No N/A

If no, provide location and describe condition(s).

Comments:

2. Security

a. Indicate whether any of the events below have been documented in the last twelve months, and the frequency of the event(s).

Event	Frequency	Event	Frequency
<input type="checkbox"/> Break-Ins		<input type="checkbox"/> Arrests	
<input type="checkbox"/> Vandalism		<input type="checkbox"/> Drug Activity	
<input type="checkbox"/> Auto Theft		<input type="checkbox"/> Other (please specify):	
<input type="checkbox"/> Personal Assaults		<input type="checkbox"/> None	

Comments:

b. Indicate which types of security measures, if any, are utilized on site.

- Tenant Patrol
- Volunteer Organization
- Paid Car Patrol
- Paid on-site Guard
- Police Patrol
- TV Monitor
- Drug Free Housing Plan
- Security Cameras
- Motion Sensors
- Crime Prevention Plan
- Community Policing
- Other (please specify)
- None

Comments:

c. Based on the answers provided in questions a and b above, what corrective actions, if any, have been taken by the owner/agent?

Comments:

d. Has the owner/agent requested a rent increase based on cost increases in security costs? Yes No

If yes, indicate security measures taken.

Comments:

CATEGORY B. FOLLOW-UP & MONITORING OF PROJECT INSPECTIONS

3. Follow-Up & Monitoring of Project Inspections and Observations (Sampling is at reviewer's discretion to respond to questions a and b below)

a. Based on a sampling, if EH&S items were identified have the deficiencies been corrected and documented according to the owner/agent's certification for the most recent REAC inspection? Yes No N/A

If no, provide an explanation.

Does the analysis show any repetitive or systemic problems? Yes No

Comments:

b. Based on a sampling of units and common areas, for all other deficiencies noted in the REAC inspection, as applicable, verify that corrective actions have been taken. Have the deficiencies been corrected? Yes No N/A

If no, is there a schedule for correcting the deficiencies within a reasonable timeframe to comply with decent, safe, sanitary and good repair standards?

Yes No

Comments:

On-Site Review (Continued)

4. Follow-Up & Monitoring of Lead-Based Paint Inspection – The following questions only apply to subsidized family properties or elderly properties housing children under six years of age that were constructed prior to 1978. If constructed after 1977, check N/A for questions a and b.

a. Is there a certification on file documenting that the project has been certified to be free of lead-based paint or lead hazards? Yes No N/A

If there is a certification, obtain a copy for the project file.

Comments:

b. Is the owner in compliance with the HUD approved lead hazard control plan as noted on the desk review? Yes No N/A

Comments:

CATEGORY C. MAINTENANCE & STANDARD OPERATING PROCEDURES

5. Maintenance

a. Indicate below to confirm that there is a schedule for preventive maintenance/servicing for the items listed that are applicable.

- Heating and A/C Equipment
- Water Heaters
- Carpets and Drapes
- Roof, gutter and Fascia Inspection
- Major Appliances
- Elevators
- Motor Vehicles
- Sewer lines
- Exterior painting
- Windows
- Recreational equipment
- Landscaping maintenance
- Other (please specify):

Comments:

b. Is there a satisfactory inventory system to account for tools, equipment, supplies, and keys (serial numbers, bar codes, etc.)? Yes No

Comments:

c. Has the owner/agent secured inventory items, such as appliances and tools, to prevent theft? Yes No

Comments:

d. Does the owner/agent have a written procedure that explains the process for inspecting units? Yes No

If yes, review a copy.

Identify employee responsible for conducting the inspections: Name and Title:

Comments:

e. How often are units inspected?

- Monthly
- Quarterly
- Semi-Annually
- Annually
- Move-In
- Move-Out
- Other (please specify):

Comments:

f. How are unit inspections documented?

Please Describe:

g. If deficiencies are noted during a unit inspection, what is the procedure for correction?

Please describe:

h. What is the average number of days from move-out until the unit is ready for occupancy? ____

Comments:

i. Is there a written procedure for completing work orders? Yes No

If yes, review a copy.

Comments:

j. Is there a procedure in place to handle emergency work orders? Yes No

If yes, describe the procedure:

On-Site Review (Continued)

k. Is there a backlog of work orders? **Yes** **No**

If a backlog exists, indicate the current number of work orders:

Number between 1-3 days: ____ Number between 4-7 days: ____ Number more than one week: ____

Comments:

l. Who is provided copies of completed work orders? (check all that apply.)

Tenant Tenant File Maintenance Staff Other (please specify) ____

Comments:

m. Is there documentation by unit that indicates the date of purchase, manufacturer, model, and serial number for appliance purchases (i.e., ranges, refrigerators, furnaces, air conditioners, hot water heaters, etc.)? **Yes** **No**

Comments:

6. Vacancy and Turnover

a. How many units were vacant on the date of the on-site visit?

Number of Vacant Units: ____ Number Ready for Occupancy: ____ Average Length of time for unit turnover: ____

Comments:

b. Walk through at least two vacant units that are ready for occupancy. Assess and document unit readiness.

Number of Units Visited: ____ Number of Units Ready for Occupancy: ____ Number of Units Not Ready for Occupancy: ____

Comments:

c. Based on the interview with on-site staff, are any of the factors listed below contributing to vacancy problems? (Below, indicate all that apply.)

Security Problems Non-competitive Amenities Inadequate Marketing Project Reputation Poor Maintenance Rents too High
 Location Lack of Demand Tenant/Management Relations Applicants Do Not Meet Screening Criteria
 Other (please specify) _____
 Bedroom Mix/Size (If yes, indicate which bedroom sizes are hard to rent) ____

Comments:

d. Based on the responses in questions a, b and c, what actions are being taken by the owner/agent to resolve the issue(s)?

If not applicable, proceed to question 7.

Please describe:

7. Energy Conservation

Has management attempted to reduce energy consumption? **Yes** **No**
(check all that apply.)

Caulking and weather-stripping Conversion to individual metering Storm doors and windows Consumer education
 Water saver devices Extra insulation Assessment of Utility Rate Schedule Energy Efficient Lighting Energy Star Appliances
 Written Energy Conservation Plan Other (please specify) ____ None

Comments:

On-Site Review (Continued)

CATEGORY D. FINANCIAL MANAGEMENT/PROCUREMENT
(This Category applies only to HUD Staff and/or Mortgagees as indicated. CAs may proceed to Category E.)

8. Budget Management

a. Does the owner/agent's staff have access to the current operating budget in order to monitor and control expenses?
Yes No N/A

Comments:

b. Is an operating budget prepared annually and approved by the owner?
Yes No N/A

If yes, obtain a copy of the current year's budget.

Comments:

c. Are monthly or quarterly reports prepared by the owner/agent indicating variances between actual income and expenses versus budgeted income and expenses?
Yes No N/A

Comments:

d. If this is a 202 or 811 project, does the owner/agent maintain a current annual budget?
Yes No N/A

This question applies only to HUD Staff.

If yes, is it available on-site?
Yes No

Comments:

9. Cash Controls

a. Are collections deposited on the day received or, pending deposit, are they secured and properly controlled? Yes No

Comments:

b. Are adequate controls in place when cash is accepted?
Yes No N/A

Check the controls that are used.

Pre-numbered rent receipts Bank collections Safe Lock box

Comments:

c. Do different persons handle bank deposits and accounts receivable, or is an alternative safeguard used? Yes No

Indicate Names and Titles: _____

Comments:

d. Are all disbursement checks prenumbered, properly identified with account numbers and supported by vouchers or invoices?
Yes No

Comments:

e. Is the supply of unused checks adequately safeguarded, or under the custody of persons who do not sign checks manually, control the use of facsimile signature plates, or operate the facsimile signature machine?
Yes No

Comments:

f. Are funds (receipts, disbursements, petty cash, etc.) periodically checked on a surprise basis by a responsible official, other than site employees?
Yes No

Comments:

g. Are bank statements reconciled promptly upon receipt by someone other than a check signer, and by one who has no cash receipt or disbursement function?
Yes No

Comments:

10. Cost Controls

a. Are bills, including the mortgage payment, paid in sufficient time to avoid late penalties?
Yes No

Comments:

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On-Site Review (Continued)

b. Are operating expenses, including taxes and utilities, periodically reviewed to assure that project is paying the lowest possible rate?
Yes No

If yes, provide a recent example.

11. Procurement Controls

a. What is the procedure used to obtain and award contracts?

Describe procedure:

b. Are bids obtained prior to awarding contracts? Yes No N/A

Review contracts and determine if bids were obtained and, if the lowest bids were not selected, determine the owner's/agent's reasoning for selection.

Comments:

c. Is there a written procedure for checking the quality of work performed by a contractor prior to authorizing payment?
Yes No

Comments:

d. Is there a procedure to assure that the individual authorizing contracted work or services is not the same individual authorizing payment?
Yes No

Comments:

e. Who is the responsible person charged with inspecting the quality of work performed by contractors prior to payment?

Please provide the name and title:

f. Does the project maintain a list of outside contractors? Yes No

Comments:

g. Are vendor bills paid in time to obtain maximum trade discounts? Yes No

Comments:

h. Is there any indication that real or personal property has been subtracted from the mortgaged premises without the permission of the Department?

Comments:

i. Below, check services currently contracted with outside contractors and provide the name of the contractor and annual amount of the contract. Indicate (by asterisk) whether there is an identify-of-interest relationship between the contractor and the owner/agent.

Service	Name of Contractor	Annual Contract Amount
<input type="checkbox"/> Elevator		\$
<input type="checkbox"/> Exterminating		\$
<input type="checkbox"/> Apartment Cleaning		\$
<input type="checkbox"/> Heating and A/C		\$
<input type="checkbox"/> Plumbing		\$
<input type="checkbox"/> Security		\$
<input type="checkbox"/> Trash Collection		\$
<input type="checkbox"/> Decorating		\$
<input type="checkbox"/> Grounds		\$
<input type="checkbox"/> Other		\$

Comments:

On-Site Review (Continued)

12. Accounts Receivable/Payable

a. Complete the following as of end of last month.

Cash \$ _____ Accounts Receivable \$ _____ Accounts Payable \$ _____

Are tenant accounts receivable within acceptable limits of 10% of one month's rent potential? Yes No

Amount of receivables above is _____% of monthly rent potential.
Of this amount, \$ _____ is more than 30 days past due.

Comments:

b. Does the procedure for write-off of bad debts appear reasonable? Yes No

Comments:

c. Has annual "write-off of tenants' accounts receivable for the last two fiscal years been less than 1% of gross rent potential? Yes No

Comments:

d. Are accounts payable reasonably current? Yes No

Indicate amount of accounts payable more than 60 days old: _____

What are the owner/agent plans to reduce outstanding payables? _____

Comments:

13. Accounting and Bookkeeping

a. Are books and records maintained as required by HUD Handbook 4370.2 (Chapter 4) and 24 CFR Part 5?

Yes No N/A

Check books of accounts that are maintained. Indicate where books may be examined.

O – owner's office; **A** – agent's office; **P** – project site

General Ledger () **Rent Receivable Ledger** () **General Journal** ()
 Cash Receipts Journal () **Cash Disbursements Journal** () **Accounts Payable Journal** ()

Comments:

b. Are all required project accounts in the name of the project in a federally insured institution? Yes No

Comments:

c. Are operating funds, security deposits, reserve funds, and flexible subsidy funds maintained in separate accounts and properly secured for authorized use? Yes No

Comments:

d. Does the mortgagor make frequent postings (at least monthly) to the ledger accounts? Yes No

Comments:

e. If applicable is owner adhering to HUD-approved repayment Plan? (loan from reserve for replacement, 236 excess income, capital improvement loan, etc.) Yes No

Comments:

f. Is centralized accounting used for disbursements? Yes No

If yes, are only HUD-insured projects in the pool? Yes No

Comments:

g. If centralized accounting is used, has it been approved by HUD? Yes No N/A

Comments:

On-Site Review (Continued)

h. If centralized accounting is used, is it being administered in accordance with HUD's approval? **Yes** **No** **N/A**

Comments:

i. If the trust account is part of a centralized disbursement account, are only HUD-insured projects in that account? **Yes** **No**
 If yes, is the project's balance transferred to the project account at least once monthly? **Yes** **No**

Comments:

j. If there are automobiles and/or debit or credit cards charged to the project, are the titles kept in the name of the project? **Yes** **No**
 If yes, do they have HUD approval? **Yes** **No**

Comments:

PROCEED TO PAGE 8 OF 19 FOR CATEGORY E. LEASING AND OCCUPANCY

On-Site Review (Continued)

CATEGORY E. LEASING AND OCCUPANCY (This Category does not apply to Mortgages)

14. Application Processing and Tenant Selection

a. Does the application form contain sufficient information to determine applicant eligibility? Yes No

Comments:

b. Does the application ask whether the applicant or any member of the applicant's household is subject to a lifetime state sex offender registration program in any state? Yes No

Comments:

c. Does the application ask for a listing of states where the applicant and members of the applicant's household have resided? Yes No

d. Is form HUD-92006 "Supplement to Application for Federally Assisted Housing", an attachment to the application or part of the application package? Yes No

Comments:

e. Is there an arms length procedure between the person who denies an application and the application appeal reviewer? Yes No

Comments:

f. Has the owner/agent leased a Section 8 unit to a police officer or security personnel who is over the income limits for the project?
If yes, has HUD or CA authorized the admission? Yes No
Yes No

Comments:

g. Does the owner/agent have a written tenant selection plan? Yes No

If yes, does the plan include all required criteria stated in Chapter 4, Handbook 4350.3 REV-1 and all applicable notices? Yes No N/A

If no, list the required criteria that the tenant selection plan does not include:

Comments:

h. Does the project maintain a waiting list of prospective tenants? Yes No N/A

If yes, does the list include all required elements stated in Handbook 4350.3 REV-1? Yes No

Comments:

i. Enter the number of applicants on the waiting list for each type of unit: 0 BR ___ 1 BR ___ 2 BR ___ 3 BR ___ 4 BR ___ Other: ___

Comments:

j. Were the applicants selected from the waiting list in the proper order, recognizing applicable preferences? Yes No

Comments:

k. When preferences were applied, were they properly documented? Yes No N/A

Comments:

l. Is documentation available to show that the owner/agent has leased not less than 40% of the Section 8 units that became available for occupancy in the previous fiscal year to extremely low-income families? Yes No N/A
If yes, please review and obtain a copy.

Comments:

m. What marketing steps has the owner/agent taken to attract extremely low-income families? If not applicable, proceed to question n.

Please describe:

Comments:

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n. Does the advertising program comply with the existing Affirmative Fair Housing Marketing Plan? **Yes** **No**

Request to see copies of advertisements.

Comments:

o. Is the fair housing sign posted in the rental office? **Yes** **No**

Comments:

p. Is the fair housing logo included in published advertising materials? **Yes** **No**

Comments:

15. Leases and Deposits

a. Have modifications been made to the HUD model lease? **Yes** **No** **N/A**

If yes, has the lease and/or lease addenda in use been approved by HUD?
This does not include lease addenda issued by HUD

Yes **No** **N/A**

Comments:

b. Aside from rents and security deposits, what other charges are assessed (replacement keys, lockouts, etc.)?

List the type and amount of any of these charges.

Comments:

c. If other charges aside from rents and security deposits are assessed, have they been approved by HUD? **Yes** **No** **N/A**

Comments:

d. Are rents collected in accordance with the provisions of the lease? **Yes** **No**

Comments:

e. Is the policy for late fee assessment in compliance with the Handbook 4350.3 REV-1 or with state/local requirements? **Yes** **No**

Comments:

f. Are damages caused by tenants properly identified and charged to tenants? **Yes** **No**

Comments:

16. Eviction/Termination of Assistance Procedures

a. Are tenants notified of termination of tenancy or assistance in accordance with HUD requirements? **Yes** **No** **N/A**

Comments:

b. Has the owner/agent pursued eviction or termination of assistance for all individuals subject to a lifetime sex offender registration requirement who were erroneously admitted after June 25, 2001? **Yes** **No** **N/A**

Comments:

c. Are eviction procedures initiated timely, when warranted? **Yes** **No** **N/A**

Please document the following:

Number of evictions completed during the last 12 months. _____

Average cost per eviction \$ _____

Eviction handled by: Owner/Agent Attorney on staff of Owner/Agent Attorney on contract Attorney on call

NOTE: Addendum D must identify any eviction during the last 12 months which was due to a household member being subject to a state lifetime sex offender registration requirement.

Comments:

On-Site Review (Continued)

d. Is the termination of assistance initiated timely when warranted? **Yes** **No** **N/A**
Reason(s) for termination of assistance:

Comments:

17. Enterprise Income Verification (EIV) System Access and Security Compliance
Applies to subsidized properties only

a. Does the owner/agent have access to EIV? **Yes** **No**

Comments:

b. Does the EIV Coordinator(s) have an owner approval letter(s) authorizing access to EIV? **Yes** **No**

Comments:

c. Does the owner/agent and/or EIV Coordinator have:

- An initial and currently approved EIV Coordinator Access Authorization Form (CAAF) on file for each person designated by the owner as an EIV Coordinator? **Yes** **No**
- An initial and currently approved EIV User Access Authorization Form (UAAF) on file for each person designated by the EIV Coordinator as an EIV User? **Yes** **No** **N/A**
- Signed copies of the EIV Rules of Behavior for Individuals without access to the EIV system, who use EIV reports and/or data to perform their job functions? **Yes** **No** **N/A**

Comments:

d. Is there evidence that staff with access to the EIV system or to EIV reports take annual security awareness training? **Yes** **No**

Comments:

e. Does the owner/agent have security measures in place to limit access to EIV information and reports to only those persons who have proper authorization? **Yes** **No**

Comments:

f. Does the owner/agent have a procedure to review all EIV User IDs to periodically determine if the users still have a valid need to access EIV data? **Yes** **No**

Comments:

g. Does the owner/agent terminate access promptly (within 30 days) of all users who no longer have a valid need to access EIV data? **Yes** **No**

Comments:

h. Does the owner/agent have a procedure to document and report the occurrence of all improper disclosures of EIV data?
Have any improper disclosures been reported to the owner/agent? **Yes** **No**

Comments:

i. Does the owner/agent have a procedure to report any occurrence of unauthorized EIV access or security breach to the HUD National Help Desk?
Have any occurrences of unauthorized EIV access or security breaches been reported? **Yes** **No**

Comments:

j. Is there evidence that the owner/agent or any of their employees are sharing IDs and passwords? **Yes** **No**

Comments:

k. Is EIV data being improperly shared with other entities (e.g., state officials monitoring LIHTC projects, RHS staff, or Service Coordinators not participating in the re-certification process)? **Yes** **No**

Comments:

On-Site Review (Continued)

1. Does the owner/agent keep in the tenant file the Tenant Consent for Disclosure of EIV Information, signed by the tenant and a third party when a third party assists in the re-certification process? **Yes** **No** **N/A**

Comments:

18. Compliance with Using EIV Data and Reports

Applies to subsidized properties only.

a. Does the owner/agent have policies and procedures describing the use of EIV employment and income information and the EIV reports?

Yes **No**
Yes **No** **N/A**

If yes, do they comply with HUD's usage requirements?

Comments:

b. Is the owner/agent using the following EIV reports, and taking appropriate action to correct discrepant data in TRACS, and/or to reduce improper subsidy payments and where applicable, retaining documentation to support the action(s)?

Summary Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
New Hires Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
No Income Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Failed EIV Pre-screening Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Failed Verification Report (Failed the SSA Identity Test)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Existing Tenant Search	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Multiple Subsidy Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Deceased Tenant Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Comments:

19. TRACS Monitoring and Compliance (applies to subsidized properties only)

a. Is the owner/agent using TRACS queries to review and monitor their transmission? **Yes** **No**

Comments:

b. Is the owner/agent following up and correcting deficiencies identified in TRACS data? **Yes** **No**

Comments:

20. TRACS Security Requirements (applies to subsidized properties only)

a. Is the owner's/agent's "Rules of Behavior for TRACS" current (within last 12 months) and on file? **Yes** **No**

Comments:

b. Is the owner's/agent's completed annual TRACS "Security Training Certificate" current, on file and dated within 30 days of the date of the "Rules of Behavior"? **Yes** **No**

Comments:

21. Tenant File Security

a. Are the tenant files, as well as other files that contain EIV reports, if applicable, locked and secured in a confidential manner? **Yes** **No**

Comments:

b. Is documentation relating to an individual's domestic violence, dating violence, or stalking, kept in a separate file in a secure location from other tenant files? **Yes** **No** **N/A**
Applicable to Section 8 only.

Comments:

c. Is access to tenant file information limited to only authorized staff? **Yes** **No**

Comments:

On-Site Review (Continued)

d. Who is authorized to have access to the tenant files? Name(s) and Title(s):

Comments:

e. Is the owner/agent maintaining tenant files according to HUD’s document retention requirements? Yes No

Comments:

f. Is the owner/agent properly disposing of tenant records (shred, burn, pulverize etc.)? Yes No

Comments:

22. Summary of Tenant File Review	
This section applies only to subsidized projects and should be completed after the tenant file reviews (See Addendum A.)	
The minimum file sample should include review of tenant files of new move-ins, re-certifications (annual, interim, initial), at least one applicant reject file, and at least one terminated/move-out file. In order to review specific functions (EIV usage, utility reimbursement, pet rules/deposits, minimum rents, etc.) it may be necessary to target a portion of the files reviewed to specific tenant families. The reviewer should adjust the tenant file sample to meet the needs of the review.	
<i>Number of Units</i>	<i>Minimum File Sample</i>
100 or fewer	5 files plus 1 for each 10 units over 50
101-600	10 files plus 1 for each 50 units or part of 50 over 100
601-2000	20 files plus 1 for each 100 units or part of 100 over 600
Over 2000	34 files plus 1 for each 200 units or part of 200 over 2,200
For each question, only answer “Yes” if the files reviewed are acceptable. Answer “No” if the files are not acceptable and note the number of files with deficiencies utilizing the tenant file worksheet, Addendum A	Number of Files Reviewed = ____
(Please note: There is no maximum number of files to be sampled)	

a. Tenant Files and Records

i. Are the tenant files organized and properly maintained? Yes No

Number of Files with Deficiencies: ____

Comments:

ii. Do the files contain all documentation as required in Handbook 4350.3 REV-1, applicable HUD Notices, and any changes to the CFR?

Yes No

Documents Missing from Files:

Comments:

b. Application/Tenant Selection

i. Are the applications in the files signed and dated by applicant? Yes No

Number of Files with Deficiencies: ____

Comments:

ii. Is screening conducted in accordance with the Tenant Selection Plan? Yes No

Number of Files with Deficiencies: ____

Comments:

iii. Are the unit sizes appropriate for household composition at the time of this tenant file review? Yes No

Number of Files with Deficiencies: ____

Comments:

On-Site Review (Continued)

iv. If a household was ineligible at move in, were exceptions granted? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

c. Lease

i. Are the correct model leases used? Yes No

Number of Files with Deficiencies: ____

Comments:

ii. Are the leases signed and dated by all required parties? Yes No

Number of Files with Deficiencies: ____

Comments:

iii. Are HUD issued lease addenda properly signed and in the file? Yes No

Number of Files with Deficiencies: ____

Comments:

iv. Are the applicable addenda attached to the lease? Yes No

Number of Files with Deficiencies: ____

Comments:

v. Are security deposits collected in the correct amount for the program? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

vi. Are pet deposits within acceptable range and payment installments allowed? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

vii. Do the tenant files contain signed acknowledgement(s) and/or copies as required of the following documents indicating receipt by the tenant?

HUD-9887 Fact Sheet Yes No

Number of Files with Deficiencies: ____

Lead Based Paint Disclosure Yes No N/A

Number of Files with Deficiencies: ____

Resident Rights and Responsibilities Brochure Yes No

Number of Files with Deficiencies: ____

EIV & You Brochure Yes No

Number of Files with Deficiencies: ____

Fact Sheet How Your Rent is Determined Yes No

Number of Files with Deficiencies: ____

Race/Ethnicity Form Yes No

Number of Files with Deficiencies: ____

Comments:

d. Certification/Re-Certification Activities:

i. Are re-certification notices issued in accordance with HUD requirements? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

On-Site Review (Continued)

ii. Are certifications completed on time? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

iii. Are all necessary verifications completed and properly documented? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

iv. Are EIV Income Reports used for third party verification of employment and income? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

v. If the tenant disputed the EIV employment and/or income reported in EIV, was a third party verification obtained from the source?

Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

vi. Are appropriate actions being taken for income discrepancies reported on the EIV Income Discrepancy Report, and is the action documented?

Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

vii. Are income and deductions calculated correctly prior to data entry? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

viii. Does income information on the tenant certifications agree with verified file information? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

ix. If tenants were granted a hardship exemption as part of the minimum rent, was the exemption applied correctly?

Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

x. Are Repayment Agreements in accordance with HUD requirements? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

xi. Are notices provided to tenants in accordance with HUD tenant notification requirements when their portion of rent has increased?

Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

On-Site Review (Continued)

xii. Are the correct contract rents used when determining the subsidy to be paid on behalf of tenants? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

xiii. If tenants are paying their own utilities, are the current certifications reflecting the correct utility allowances?
Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

xiv. Are utility reimbursement checks distributed within 5 business days of receipt of the housing assistance payments?
Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

e. Voucher Billing

i. Are there any deficiencies noted in the tenant file review that results in over payment or under payment of the subsidy?
Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

ii. For the move-in/move-out tenant file review, does the owner/agent make appropriate voucher adjustments?
Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

f. Move-In Files

i. Are proper income limits used for determining eligibility at move-in? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

ii. Do the files contain move-in inspections? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

iii. If the files contain move-in inspections, have the owner/agent and the tenant signed and dated the inspection?
Yes **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

iv. Do the move-in files created after January 31, 2010 indicate that the owner/agent utilizes the EIV Existing Tenant Search for all household members and applicants? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

g. Move-Out Files

i. Do tenants provide written notice of intent to vacate in accordance with the HUD model lease? **Yes** **No** **N/A**

Number of Files with Deficiencies: ____

Comments:

On-Site Review (Continued)

ii. Are move-out inspections conducted? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

iii. Are security deposits refunded in 30 days or less if required by state law? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

iv. Are tenants provided an itemized list of charges against the security deposits? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

v. If charges exceed the security deposit, are the tenants billed for the balance due? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

h. Application Rejection Files

i. Are applicants denied admittance in accordance with the Tenant Selection Plan? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

ii. Do rejection letters provide applicants the right to appeal? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

iii. If applicant appealed an application rejection, was the appeal reviewed by someone other than person who made the original decision to reject? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

iv. Were appeals processed and applicants notified of the appeal decision within 5 days of the meeting? Yes No N/A

Number of Files with Deficiencies: ____

Comments:

CATEGORY F. TENANT/MANAGEMENT RELATIONS (This Category does not apply to Mortgagees)

23. Tenant Concerns

a. Is there a written procedure for resolving tenant complaints or concerns? If yes, review a copy. Yes No

Comments:

b. Does the procedure adequately cover appeals? Yes No

Comments:

c. Is there an active tenant organization at this project? Yes No

Comments:

d. Is tenant involvement in project operations encouraged? Yes No

Comments:

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24. Provision of Tenant Services

a. What social services are provided by the project, or the neighborhood, which meet the tenants' needs? Below, indicate services that are available, and identify the entity providing the service (i.e., city/county/state, church/school, community groups, etc.) and enter the cost to the project, if any.

Service	Provider	Financial Source
<input type="checkbox"/> Child Care		
<input type="checkbox"/> Recreation		
<input type="checkbox"/> Health Care		
<input type="checkbox"/> Energy Conservation		
<input type="checkbox"/> Vocational Training/Job Training		
<input type="checkbox"/> Meals		
<input type="checkbox"/> Financial Counseling		
<input type="checkbox"/> Substance Abuse Counseling		
<input type="checkbox"/> Service Coordinator		
<input type="checkbox"/> Neighborhood Networks Center		
<input type="checkbox"/> Other (please specify)		

b. Is there a Service Coordinator for the project? Yes No

If there is no Service Coordinator, proceed to question 24.f.

Comments:

c. Is the Service Coordinator's office clearly identifiable and private? Yes No

Comments:

d. Are the Service Coordinator's files kept secure and confidential? Yes No

Comments:

e. Does the Service Coordinator maintain a directory of service agencies and contacts, and make the information available to all parties? Yes No

Comments:

f. If there is a Neighborhood Networks Center as indicated on the Desk Review, what is the status of operations?

If there is no Neighborhood Networks Center, proceed to question 24.h.

- Open for Business
- Temporarily Closed – State the date the center will reopen: _____
- Permanently Closed – State the date the center closed: _____

Comments:

g. What programs are offered at the Neighborhood Networks Center?

- GED Adult Basic Education Computer Classes Job Training Job Placement
- Homework Assistance English as a Second Language Other (please specify) _____

Comments:

h. The Department allows owners and their agents to provide services related to renter's insurance products. Does the owner/agent offer such services? Yes No

If the owner/agent offers no such service, proceed to question 25.

Comments:

i. HUD policy prohibits an owner/agent from evicting tenants for delinquent renter's insurance payments.

How does the owner/agent deal with unpaid renter's insurance?

Please explain the process:

Comments:

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j. Review the renter’s insurance information provided to tenants. Does the information provided to tenants clearly indicate that purchasing insurance is optional, and not required as a condition of occupancy? **Yes** **No** **N/A**

Comments:

CATEGORY G. GENERAL MANAGEMENT PRACTICES

25. General Management Operations

a. Have the complaints, as noted on the Desk Review, been satisfactorily resolved? **Yes** **No** **N/A**

Comments:

b. Is the project staff able to adequately perform management and maintenance functions? **Yes** **No**

Comments:

c. How does the owner/agent implement HUD changes in policies and procedures?

Describe the process:

d. Does owner/agent have a formal ongoing training program for its staff? **Yes** **No**

If yes, indicate types of training used and the frequency.

Type	Frequency	Type	Frequency
<input type="checkbox"/> On-Site		<input type="checkbox"/> Industry/Association Training	
<input type="checkbox"/> HUD Seminars		<input type="checkbox"/> Local Colleges	
<input type="checkbox"/> Energy Conservation		<input type="checkbox"/> Other (please specify)	

Comments:

e. Are reports submitted to the owner from the management agent? **Yes** **No** **N/A**
This question applies only to HUD Staff and Mortgagees.

Comments:

f. Are there signs enabling persons to locate the office? **Yes** **No**

Comments:

g. Are after hours and emergency telephone numbers posted? **Yes** **No**

Comments:

h. List the current insurance coverages (property, liability, Directors and Officers, workman’s compensation, automobile). (Check to make sure that HUD is listed as an additional loss payee, if applicable. Also, check to make sure that the insurance policy is in the name of the mortgagor entity.)
This question applies only to HUD Staff and Mortgagees.

Type	Basic Coverage	Annual Premium
Property		
Liability		
Other (please specify)		
Other (please specify)		

Comments:

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i. Does the owner/agent have a fidelity bond? Yes No N/A
This question applies only to HUD Staff and Mortgagees.

Comments:

26. Owner/Agent Participation

This question applies only to HUD Staff and Mortgagees. CAs may proceed to question 27.)

a. If the project is owned by a cooperative or a nonprofit entity, does the Board of Directors meet regularly and record minutes? Yes No N/A

Comments:

b. Review copies of the minutes. Does a review of the minutes indicate compliance with HUD's business agreements? Yes No N/A

Comments:

c. Does the owner/agent have a system or procedure for providing field supervision of on-site personnel? Yes No N/A

Comments:

27. Staffing and Personnel Practices

a. Has management made an effort to employ tenants in accordance with Section 3 of the Housing and Community Development Act of 1968? Yes No

Comments:

b. List all on-site staff charged to the project. (Use additional sheets if necessary).

Staff Person / Title	Date Hired	% of Time Charged to Site	Annual Salary	Unit Size	Is the Employee Receiving Subsidy?	Is the Employee occupying a Non-Income Producing Unit?
/		%			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
/		%			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
/		%			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
/		%			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
/		%			Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>

Comments:

c. Does the staffing chart above match Part D of the Rent Schedule, form HUD-92458 as it relates to non-income producing units? **HUD staff only.** Yes No

Comments:

Tenant File Review Worksheet

Tenant File Review Worksheet

Instructions: Review the appropriate number of tenant files and complete a copy of this worksheet for each file reviewed. Indicate the initial move-in date in the appropriate box. Indicate by marking the appropriate box (Yes, No, or N/A) for each document available in the tenant file. For move-out and applicant rejections files, reviewer should only complete the pertinent sections.

Name of Reviewer: _____

Type of Review:

Applicant Rejection Tenant Move-In Tenant Move-Out Certification/Recertification

Effective date of certification(s) reviewed: _____

If this is a Certification or Recertification, check the certification type:

Certification Type Initial Annual Interim Corrections Other

Family Name: _____

Unit Number: _____

Move-in Date: _____

Bedroom Size: 0 Bedroom 1 Bedroom 2 Bedroom 3 Bedroom 4 Bedroom 5 or more Bedrooms

A. HOUSEHOLD INFORMATION		Comments
1. Is the application complete, including the date and time received by the owner/agent?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
2. Is there a form HUD-92006, "Supplement to Application for Federally Assisted Housing" in the files of tenants who applied after 12/14/2009? Tenant completion of this form is optional.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
3. Are the EIV Existing Tenant Search results in the file along with contacts made as a result of the search? Applicable to move-ins after January 31, 2010	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
4. Are the household members identified correctly? (as head, spouse, dependent, co-head, other adult(s), live-in aide, foster child and foster adult)	Yes <input type="checkbox"/> No <input type="checkbox"/>	
5. Is the unit size appropriate for household?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
6. Was this household's income eligible at move-in? This question applies only to a tenant file move-in review.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Over income? <input type="checkbox"/> Low income? <input type="checkbox"/> Very low income? <input type="checkbox"/> Extremely low income? <input type="checkbox"/>
7. If household was not income eligible at move-in, was an exception or waiver granted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
8. Does the file contain the ethnicity and racial Data Certification as provided to the owner/agent?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
9. Is there current HUD 9887/9887A Consent Form signed and dated by head, spouse, co-head regardless of age, and family members at least 18 years of age?	Yes <input type="checkbox"/> No <input type="checkbox"/>	

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<p>10. Is there an acknowledgement and/or signed document as required in the file indicating receipt by the tenant?</p> <ul style="list-style-type: none"> • Lead based paint • Resident Rights and Responsibilities Brochure • EIV & You Brochure • Fact Sheet on How Your Rent is Determined 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
<p>11. Does the tenant file indicate that the owner /agent has taken necessary steps to address any EIV reported receipt of multiple subsidies?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>12. Does the file contain documentation to verify discrepant personal identifiers, and/or subsidy paid, as reported on:</p> <p>EIV Multiple Subsidy report? EIV Deceased Tenant Report?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>B. VERIFICATION Have the following items been properly verified and documented?</p>		<p>Comments</p>
<p>1. Social Security numbers (except for those exempted by 24 CFR 5.216)?</p> <p>EIV Summary Report in file to validate SSNs? Exemption from SSN disclosure?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>2. Eligible immigration status or citizenship status?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>3. Criminal and drug screening?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
<p>4. State lifetime sex offender registration check in each state where household members reported they have resided, and/or background checks conducted using a database that checks against all state registries?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
<p>5. Other screening as disclosed in Tenant Selection Plan?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>6. Verification of:</p> <ul style="list-style-type: none"> • Disability status? • Student status? • Ages of occupants? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
<p>C. LEASE</p>		<p>Comments</p>
<p>1. Is the correct HUD model lease used?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
<p>2. Is the original lease and subsequent leases or addenda signed and dated by the owner/agent, head, spouse, co-head, and all other adult members of the household?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	
<p>3. Are applicable attachments attached to the lease, e.g. house rules, pet rules, unit inspection report?</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	

Tenant File Review (Continued)

4. If security deposit is required, is it in the correct amount? If required, enter the amount here: \$ ____	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
5. If pet deposit is required, is it in the correct amount? If required, enter the amount here: \$ ____	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
6. If a pet deposit was paid in installments, was the payment schedule in accordance with the pet regulations?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
7. Are there inspections in the file: Move-in (dated and signed by tenant and owner/agent)? Annual unit inspections?	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
D. CERTIFICATION/RECERTIFICATION ACTIVITIES		Comments	
1. Are re-certification notices provided within the required timeframes?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
2. Are re-certifications completed on time?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
3. Is the certification signed and dated by the appropriate parties?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
4. Has a 30-day notice of increase in rent been provided to the tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
NOTE: If necessary, use additional sheets to complete applicable income information.			
		Comments	
All reported income and deductions verified and calculated correctly?	3rd Party Verification?	Amount Reported on 50059	
		Did income information on the 50059 agree with verified file information? If no, comment on discrepancies identified	
5. Wages	EIV Income Report <input type="checkbox"/> Traditional 3 rd party <input type="checkbox"/> Other <input type="checkbox"/> Not verified <input type="checkbox"/> N/A <input type="checkbox"/>	\$	
6. Social Security benefits	EIV Income Report <input type="checkbox"/> Traditional 3 rd party <input type="checkbox"/> Other <input type="checkbox"/> Not verified <input type="checkbox"/> N/A <input type="checkbox"/>	\$	
7. Unemployment benefits	EIV Income Report <input type="checkbox"/> Traditional 3 rd party <input type="checkbox"/> Other <input type="checkbox"/> Not verified <input type="checkbox"/> N/A <input type="checkbox"/>	\$	

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8. Other Income				
Welfare/Public Assistance/TANF	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Child Support	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Pensions	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Other _____	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		

9. Actual Income from Assets			Cash Value	
Checking Account	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	
Savings Account	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	
Certificates of Deposit	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	
401K/Keogh/Retirement Accounts	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	
Real Estate	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	
Other _____	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	\$	

10. Imputed income when assets are greater than \$5,000		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$	
11. Allowances/Expenses				
Dependent Allowance	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Elderly/Disabled Household Allowance	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Medical Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Disability Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
Childcare Expenses	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	\$		
12. Are all expenses and allowances that are claimed eligible under the HUD Handbook 4350.3 REV-1?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
13. Has the household certified whether or not they disposed of assets during the past two years?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
14. Is the correct unit rent being used for subsidy determination?		Yes <input type="checkbox"/> No <input type="checkbox"/>		
Enter the reviewer verified amounts for the following:		Amount Reported on the 50059	Did income information on the 50059 agree with the verified file information? If not, comment on any discrepancies identified.	
15. Contract Rent	\$ _____	\$ _____		
Utility Allowance	\$ _____	\$ _____		
Gross Rent	\$ _____	\$ _____		
Total Tenant Payment	\$ _____	\$ _____		
Tenant Rent	\$ _____	\$ _____		
Utility Reimbursement	\$ _____	\$ _____		
Assistance Payment	\$ _____	\$ _____		
16. Is the tenant paying minimum rent? If yes, was a hardship exception granted?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
17. Were income discrepancies reported on the EIV Income Discrepancy Report investigated and the file documented with the resolution?		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		

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18. Has tenant entered into a written repayment agreement for monies due to the project? If yes, does the plan contain the required information?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
19. Does file contain a re-certification as a result of new employment reported on the EIV New Hires Report? If yes, is the new employment income included in the reported annual income?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
E. BILLING		Comments
1. Does the assistance payment requested on the monthly billing (HUD-52670-A, Part 1) agree with the assistance payment on the applicable form HUD-50059?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
2. If required, have adjustments been made to the monthly billing?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
F. MOVE-OUT FILE REVIEW ONLY		Comments
1. Is there a move-out notice from tenant? If yes, Date of Notice _____ Move-out date _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
2. Is there a move-out inspection? If yes, enter the date of the inspection _____	Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	
3. Was the security deposit refunded to the tenant within 30 days, or in accordance with state or local laws, whichever is shorter?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
4. Was an itemized list of damages and charges provided to the tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
5. Were any additional charges paid by tenant?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
6. Does the tenant move-out date on the voucher match the date the tenant vacated?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
G. APPLICANT REJECTION REVIEW ONLY		Comments
1. Was the reason the applicant was denied admittance in accordance with the Tenant Selection Plan?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
2. Was the reason for rejection provided in specific terms and in plain language?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
3. Did the rejection letter provide the applicant the right to appeal?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
4. If the applicant appealed, was the appeal reviewed by someone other than the person who made the original decision?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
5. Was the appeal processed and applicant notified of the appeal decision within five days of the meeting?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

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Office of Fair Housing and Equal Opportunity
And
Office of Multifamily Housing

Checklist for On-Site Limited Monitoring and Section 504 Reviews

Multifamily Housing (Housing) staff or Performance-Based Contract Administrators and Traditional Contract Administrators (CA) must complete this Checklist when conducting on-site management reviews of subsidized and unsubsidized multifamily housing projects. The questions on this checklist cover topics that the Housing staff or CA can be expected to answer and is not intended to cover the full range of civil rights concerns.

NOTE: This document does not require the reviewer to make a determination of civil rights or Section 504 compliance.

The Checklist is divided into four parts.

Part A: Occupancy/Accessible Units/Program Accessibility – This section, along with instructions, must be forwarded to the owner/agent for completion prior to the on-site review. This document must be included with the Documents Reviewer Should Obtain from Owner. See Part D.

Part B: Limited On-Site Monitoring Review – The reviewer must complete this section during the on-site management review of all projects.

Part C: Section 504 Review – The reviewer must complete this section during the on-site management review for all federally-assisted projects.

Part D: Documents Reviewer Should Obtain from the Owner/Agent during the on-site management review.

Please Note that a “No” response to any question does not necessarily mean there is a fair housing or civil rights or a Section 504 violation.

**Management Review for
Multifamily Housing Projects**

**U.S. Department of Housing
and Urban Development**
Office of Housing – Federal Housing Commissioner

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Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name: _____

FHA /Project Number: _____

Section 8/PAC/PRAC Number: _____

Owner/General Partner Name: _____

Management Agent Name: _____

Owner/General Partner Address: _____

Management Agent Address: _____

Type of Development: Cooperative Elderly Only Disabled Only
 Elderly/Disabled Family Other(Specify)_____

Total Number of Units: _____ Total Subsidized Units: _____

Type of Federal Financial Assistance (check all that apply):

Section 8 Section 202 Section 202/8 Section 202/PAC
 Section 202 PRAC Section 811 Section 221(d)(3)BMIR Section 236 Other _____

Number of Units of Each Size: 0 BR _____ 1 BR _____ 2 BR _____ 3 BR _____ 4 BR _____ 5 BR _____
Other (Specify)_____

Resident Manager's Unit: **Yes** **No**

Date of First Occupancy: _____

Service Coordinator Employed By Project? **Yes** **No**

Reviewed by: Housing PBCA CA Mortgage

Reviewer: _____

Date: _____

Phone: _____

This Section is for Multifamily Housing Staff only:

After a review of the information provided by the owner/agent in Part A, the following as been determined:

The owner/agent is in compliance with Title VI, Subpart D of the Housing and Community Development Act of 1992.

Possible noncompliance with Title VI, Subpart D of the Housing and Community Development Act of 1992. Referred to the local Office of Fair Housing and Equal Opportunity for additional review and appropriate action.

Title VI, Subpart D of the Housing and Community Development Act of 1992 - Not Applicable

Reviewed By: _____
(Name and Title)

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

**PART A
OCCUPANCY/ACCESSIBLE UNITS/PROGRAM ACCESSIBILITY**

Authority:
Section 504 of the Rehabilitation Act of 1973 (24CFR Part 8)
Fair Housing Act/Title VIII Regulations (24 CFR Part 100.200)
Uniform Federal Accessibility Standards (UFAS) (24 CFR Part 40)
Regulatory Agreement

For this Part A, the reviewer must forward the form along with the instructions for completion to the owner/agent prior to the on-site review. For subsidized projects, the owner/agent must complete the project information above and the information in Sections I, II, and III below. (See attached instructions.) For unsubsidized projects, the owner/agent must complete the project information above and Sections I and II only. Section III consists of Section 504 compliance, which does not apply to projects that do not receive federal financial assistance. The reviewer will retrieve the completed form from the owner/agent during the on-site review.

SECTION I – OCCUPANCY

<p>1. This property was designed primarily for:</p> <p><input type="checkbox"/> Exclusively Elderly</p> <p><input type="checkbox"/> Exclusively Disabled</p> <p><input type="checkbox"/> Elderly and Disabled</p> <p><input type="checkbox"/> Near Elderly and Disabled</p> <p><input type="checkbox"/> Family</p>	<p>2. Indicate the number of units currently occupied by client groups below</p> <p>Exclusively Elderly - _____</p> <p>Exclusively Disabled - _____</p> <p>Elderly/Disabled - _____</p> <p>Near-Elderly Disabled - _____</p> <p>Family - _____</p>	
<p>3. Is there a use agreement or any other document that indicates that this project must serve only elderly tenants? Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown <input type="checkbox"/></p> <p>If yes, specify type of document: _____ Effective Date: _____</p> <p>Please attach a copy of the document(s) indicated above.</p>		
<p>4. If this project is a “covered Section 8 housing project” (see instructions), is there an occupancy preference for the elderly in accordance with Section 651 of Title VI, Subpart D of the Housing and Community Development Act of 1992? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Refer to HUD Handbook 4350.3, REV-1.</p> <p>If No, proceed to question 5.</p>		
<p>If yes, please enter:</p> <p>a. the date of the elderly preference: _____</p> <p>b. the number of units that must be reserved for occupancy by non-elderly persons with disabilities _____, and,</p> <p>c. the date used to determine the number of units reserved for non-elderly persons with disabilities _____</p>		
<p>5. Is there an occupancy restriction for the elderly in accordance with Section 658 of Title VI, Subpart D of the Housing and Community Development Act of 1992? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Refer to HUD Handbook 4350.3, REV-1</p>		
<p>6. Total Number of Units exclusively for the Elderly</p> <p>_____</p>	<p>7. Total Number of Units exclusively for Persons with Disabilities</p> <p>_____</p>	<p>8. Total Number of Units exclusively for Non-Elderly Persons with Disabilities</p> <p>_____</p>
<p>I certify that this information is true and accurate.</p> <p>Warning: HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)</p>		
<p>Signature of Owner</p>	<p>Date:</p> <p>_____</p>	

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

SECTION II – ACCESSIBLE UNITS

Distribution of all wheelchair and other accessible units in the project.

Bedroom Size	0	1	2	3	4	5	Other	Total
1. All units								
2. Total units with project-based rental assistance								
3. Mobility accessible units								
4. Vision and/or Hearing accessible units								
*5. (Total Accessible Units)								
6. Number of persons on waiting list who have requested accessible units								
7. Number of accessible units occupied by elderly or family tenants								
8. Number of accessible units occupied by non-elderly tenants with disabilities who require the features of the unit								
9. Number of accessible units occupied by elderly tenants with disabilities who require the features of the unit								
10. Percentage of Total Units with Project-Based Rental Assistance Total line 2 ÷ Total line 1 x 100) ___%								
11. Percentage of Total Units that are mobility accessible Total line 3 ÷ Total line 1 x 100) ___%								
12. Percentage of Total Units that are vision and/or hearing accessible Total line 4 ÷ Total line 1 x 100) ___%								

*** If a unit is both mobility accessible and vision or hearing accessible, count the unit only once in line 5.**

I certify that this information is true and accurate.	
Warning: HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Signature of Owner	Date: _____

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

SECTION III – PROGRAM ACCESSIBILITY

SECTION 504 OF THE REHABILITATION ACT OF 1973

Section 504 Coordinator [24 CFR 8.53 (a)]

1. Does the recipient (as defined in 24 CFR 8.3) employ at least 15 employees? **Yes** **No**

If Yes, answer Question 2.; if No skip to Question 3.

2. Is at least one person designated to coordinate its Section 504 responsibilities? **Yes** **No** **N/A**

If Yes, provide the person’s name and telephone number below.

Name: _____

Telephone Number: _____

Program Accessibility Under Section 504, a federally assisted Housing Development is required to ensure that its program is usable by and accessible to persons with disabilities. This includes, but is not limited to, maintaining housing and non-housing facilities that are structurally accessible for persons with disabilities. The extent to which facilities must be structurally accessible depends in part, on whether they are new, altered, or existing. In addition, owner/agents are required to ensure that appropriate and effective communication methods are used while communicating with persons with disabilities.

	YES	NO	COMMENTS
3. Has the owner/agent taken steps to ensure effective communication using:			
a. Qualified sign language and oral interpreters?	<input type="checkbox"/>	<input type="checkbox"/>	
b. Readers?	<input type="checkbox"/>	<input type="checkbox"/>	
c. Use of tapes?	<input type="checkbox"/>	<input type="checkbox"/>	
d. Braille materials?	<input type="checkbox"/>	<input type="checkbox"/>	
Other (Describe):	<input type="checkbox"/>	<input type="checkbox"/>	

I certify that this information is true and accurate.

Warning: HUD will prosecute false claims and statements. Convictions may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature of Owner

Date:

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

INSTRUCTIONS FOR COMPLETING PART A

General instructions: Complete the project name, FHA/project number, and section 8/pac/prac information in the form header for each page:

SECTION I - Owner/Agent must respond to all questions in this section.

1. Check the appropriate box that the project was designed to serve. **(Check only one box. Do not leave blank.)**

Exclusively Elderly - defined as a person 62 years of age or older. (This option is for projects that were designed to serve only elderly persons/families, i.e. Section 202 PRAC properties)

Exclusively Disabled - Refer to HUD Handbook 4350.3, REV-1, Figure 3-6 for the applicable definition of disability. (This option is for projects that were designed to serve only persons with disabilities, i.e., Section 202/8 Projects for the Disabled and Section 811 projects. Please note that Section 202/8 Projects for the Disabled were developed to serve only non-elderly persons with disabilities. However, the Section 811 Projects were developed to serve persons with disabilities regardless of age as long as the minimum age requirement (age 18) is met.)

Elderly and Disabled - defined as a property that serves the elderly and non-elderly persons with disabilities. (This option is for projects that were originally designed to serve only elderly persons/families, however the owner may have elected a preference under Section 651 of Title VI, Subpart D of the Housing and Community Development Act of 1992 (Title VI Subpart D) to reserve a percentage of units for non-elderly persons with disabilities in accordance with the provisions of Section 652, Title VI Subpart D. See instruction 4 below for Section 651 definition.)

Family - defined as all persons regardless of age or disability. (This option is for projects that serve all families with no restrictions or preferences as long as the minimum age requirement is met. Please note that family projects may have some units that are reserved for persons with mobility/vision/hearing impairments which would require the applicant to meet the accessibility features of the unit.)

2. Enter the number of units occupied by each client group. (Please note that the term “near-elderly disabled” is defined as a person who is at least 50 years of age and below the age of 62 with a disability as defined in HUD Handbook 4350.3, REV-1.)

Enter zero “0” if there are no units occupied by the listed client group – do not leave blank.

3. If there is a use agreement or other document requiring that the property must serve only elderly persons, answer “Yes”, in the space provided, and attach a copy of the document(s). If there is no use agreement or other document requiring that the property must serve only elderly persons, answer “No”. If you are unclear on the term “use agreement”, or are not able to locate the use agreement or other document that defines the occupancy of your project, the answer is “unknown”. Other documents include the regulatory agreement, loan commitment papers, financial documents, bid invitation, owner’s management plan, application for funding, and/or application for mortgage insurance. Please refer to HUD Handbook 4350.3, REV-1, paragraphs 3-17 and 3-18. If you do not have a copy of HUD Handbook 4350.3, REV-1, copies can be obtained from www.hudclips.org or the HUD Customer Service Center at (800) 767-7468.
4. Section 651 of Title VI Subpart D permits an owner to give preference¹ to elderly families if (1) the project was originally developed to serve the elderly and (2) it is a “covered Section 8 housing project.” “Covered Section 8 housing projects” are projects that were constructed or substantially rehabilitated pursuant to assistance provided under section 8(b)(2) of the United States Housing Act of 1937, as in effect before October 1, 1983, that are assisted under a contract for assistance under such section.

Section 651 of Title VI Subpart D applies to the following programs:

- The Section 8 New Construction Program, 24 CFR part 880
- The Section 8 Substantial Rehabilitation Program, 24 CFR part 881
- The State Housing Agencies Program, insofar as it involves new construction and substantial rehabilitation, 24 CFR part 883
- The New Construction Set-Aside for Section 515 Rural Rental Housing Projects Program, 24 CFR part 884
- The Section 8 Housing Assistance Program for the Disposition of HUD-Owned Projects, insofar as it involves substantial rehabilitation, 24 CFR part 886 subpart C

“Covered Section 8 housing projects” do not include those developed with funding under the following programs:

Section 202;
Section 202/8;
Section 202 or 811 PRAC;
Section 221 (d)(3); and/or
Section 236.

If an owner elects a Section 651 preference for the elderly, the owner must reserve a number of units for non-elderly persons/families with disabilities. Title VI Subpart D requires that the owner review the occupancy records on January 1, 1992 and October 28, 1992, the date of enactment for Title VI Subpart D, and determine the number of non-elderly persons with disabilities that occupied units on those two dates. Compare the higher of the two numbers with 10 percent of total project units. The lower of the two resulting numbers must be reserved for non-elderly persons with disabilities, or families with disabilities.

For example, an owner has a covered Section 8 project that consists of 100 units, and decides to implement an elderly preference under Section 651. The first thing the owner must do is find the occupancy records for January 1992 and see how many units were occupied by non-elderly persons with disabilities, or families with disabilities, on January 1. In this example, it was 10 units.

Then the owner must find the occupancy records for October 1992 and see how many units were occupied by non-elderly persons/families with disabilities on October 28th, the date of the enactment of the Act. In this example it was 15 units.

¹ A “preference” allows an owner to give priority to elderly persons when selecting tenants for occupancy.

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

To obtain the number of units that must be reserved for non-elderly disabled persons or families, the owner must take the higher number of the two dates, which in this example is 15.

Then the owner will then compare that number 15 with a number that is 10 percent of the total project units. In this example it's 10.

Use the lower number for the number of units that must be reserved. Since 10 is less than 15, for this example the owner must reserve 10 units for non-elderly disabled persons or families.

If an owner determines that there were no non-elderly persons or families occupying units on either January 1, 1992 or October 28, 1992, the required number of units to be reserved for non-elderly persons with disabilities would be zero (0). However, owners are encouraged to exceed the number of reserved units for non-elderly persons with disabilities if a need exists in the community.

Answer question 4 as follows:

If there is an elderly preference in accordance with Section 651 of Title VI Subpart D, answer "Yes". If there is no preference provided to elderly families, answer "No".

If yes, answer the following:

- (a) If there is an occupancy preference in accordance with Section 651, indicate the effective date of the preference.
- (b) If there is an occupancy preference in accordance with Section 651, indicate the total number of units that must be reserved for non-elderly persons with disabilities based on the two dates above.
- (c) If there is an occupancy preference in accordance with Section 651, indicate which date (see above) was used to determine the number of units that must be reserved for non-elderly persons with disabilities.

5. Section 658 of Title VI, Subpart D of the Housing and Community Development Act of 1992 (Title VI Subpart D) permits owners of "other federally assisted housing" to continue to restrict occupancy to elderly families in accordance with the rules, standards, and agreements governing occupancy in such housing in effect at the time the housing was developed. If (A) the project was originally developed to serve the elderly and (B) the project has continually served elderly tenants. These projects include:

- Section 202 Direct Loans (prior to the Section 202 PRAC program)
- Section 221(d)(3) BMIR properties (New Construction and Substantial Rehabilitation)
- Section 236 properties

Answer question 5 as follows:

If there is an elderly restriction in accordance with Section 658 of Title VI Subpart D, answer "Yes". If there is no elderly restriction and occupancy is not limited to elderly applicants, answer "No".

6. If the property designates a number of units that can be occupied only by elderly persons, indicate the number of units. If the property does not have units that can only be occupied by elderly persons, enter zero "0".
7. If the property designates a number of units that can be occupied only by persons with disabilities, indicate the number of units. If the property does not have units that can only be occupied by persons with disabilities, enter zero "0".
8. If the property has units that must be occupied by non-elderly persons with disabilities, indicate the number of units. If the property does not have units that must be occupied by non-elderly persons with disabilities, enter zero "0".

CERTIFICATION:

Self-Explanatory **Must be signed and dated by the owner.**

SECTION II – Owner/Agent must respond to all questions in this section.

1. Enter the total number of units (by bedroom size) and enter total in the "Total" column.

Totals must match numbers entered for each bedroom size.

2. Enter the total number of units (by bedroom size) that are receiving project based rental assistance.

Totals must match numbers entered for each bedroom size.

3. Enter the number of mobility accessible units by bedroom size, and enter the total in the "Total" column. A mobility accessible unit is one that is located on an accessible route, and when designed, constructed, altered, or adapted, can be approached, entered, and used by individuals with physical disabilities, including those who use wheelchairs. Although accessibility features include items such as grab bars, flashing fire alarms, widened doorways, entrance ramps, etc, this question should be answered by stating the number of subsidized units that, when constructed, are fully accessible in accordance with the Uniform Federal Accessibility Standards (UFAS) which is used to ensure compliance with Section 504 of the Rehabilitation Act of 1973. These standards were jointly developed by the General Services Administration, the Department of Housing and Urban Development, the Department of Defense, and the United States Postal Service, under the authority of sections 2, 3, 4, and 4a, respectively, of the Architectural Barriers Act of 1968, as amended, Pub. L. No.90-480, 42 U.S.C. 4151-4157. Copies of the UFAS are available from the Architectural and Transportation Barriers Compliance Board, 1331 F Street, NW, Suite 1000, Washington, D.C. 20004-1111, Telephone: (202) 272-0080, email address: info@access-board.gov. If the property is accessible in accordance with Minimum Property Standards (MPS), indicate the number of units that are MPS accessible. Unsubsidized units should also be counted if they meet UFAS compliance requirements.

Totals must match numbers entered for each bedroom size.

4. Enter the number of units, by bedroom size, that are accessible for vision or hearing disabilities and enter total in the "Total" column. Refer to UFAS. See instruction number 3 above.

Totals must match numbers entered for each bedroom size.

5. Total the units from rows 3 and 4 for each bedroom size, and enter the total in the "Total" column.

Totals must match numbers entered for each bedroom size.

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

6. Enter the number of persons currently on the waiting list for an accessible unit, by bedroom size, requiring the features of the unit and enter total in the "Total" column.

Total must match numbers entered for each bedroom size.

7. Enter the number of accessible units, by bedroom size, that are currently occupied by elderly or family tenants and enter total in the Total column.

Total must match numbers entered for each bedroom size.

8. Enter the number of accessible units, by bedroom size, occupied by non-elderly tenants with disabilities requiring the features of the unit and enter total in the "Total" column. These tenants must have a mobility impairment as defined above.

Total must match numbers entered for each bedroom size.

9. Enter the number of accessible units, by bedroom size, occupied by elderly tenants with disabilities requiring the features of the unit and enter total in the "Total" column. These tenants must have a mobility impairment as defined above.

Total must match numbers entered for each bedroom size.

10. Self-explanatory

11. Self-explanatory

12. Self-explanatory

CERTIFICATION:

Self-Explanatory

Must be signed and dated by the owner.

SECTION III – Owner/Agent must respond to all questions in this section.

This Section is not applicable to unsubsidized projects.

1. The Section 504 Coordinator is required if the owner employs 15 or more people in all its activities. This includes this project combined with other projects they may own and/or manage. Answer Yes or No. If Yes, proceed to question 2; if No, skip to question 3.
2. Answer Yes or No to this question. If Yes, please provide the name and telephone number of the coordinator for Section 504 related activities at the project, and go to question 3.
3. Answer Yes or No to each item and provide comments as necessary.

CERTIFICATION:

Self-Explanatory

Must be signed and dated by the owner.

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

**PART B
ON-SITE LIMITED MONITORING REVIEW**

Authority: 24 CFR 5, 108, 110

Questions 1 through 5 apply to owners of subsidized **and** unsubsidized projects.

	YES	NO	COMMENTS
1. Was this project built or substantially rehabilitated after February 1972? (If NO, skip to Question 5.)	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does the owner have an approved Affirmative Fair Housing Marketing Plan (AFHMP)?	<input type="checkbox"/>	<input type="checkbox"/>	
3. If there is an approved AFHMP as indicated in question 2, is it available on site?	<input type="checkbox"/>	<input type="checkbox"/>	
4. Has the owner/agent reviewed the AFHMP within the last 5 years to ensure that the information is current and applicable?	<input type="checkbox"/>	<input type="checkbox"/>	
5. Date of last AFHMP Update			Date: _____
6. Does the project maintain Project Profile Data which shows the composition of the occupants by the following categories (24 CFR 121):			
a. Race	<input type="checkbox"/>	<input type="checkbox"/>	
b. National Origin/Ethnicity	<input type="checkbox"/>	<input type="checkbox"/>	
c. Sex	<input type="checkbox"/>	<input type="checkbox"/>	
d. Disability	<input type="checkbox"/>	<input type="checkbox"/>	
e. Familial Status	<input type="checkbox"/>	<input type="checkbox"/>	
7. Has the owner/agent developed and implemented a written Tenant Selection plan?	<input type="checkbox"/>	<input type="checkbox"/>	

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

	YES	NO	COMMENTS
8. Does the management agent maintain a waiting list of applicants by:			
(a) Name	<input type="checkbox"/>	<input type="checkbox"/>	
(b) Bedroom size	<input type="checkbox"/>	<input type="checkbox"/>	
(c) Application date and time?	<input type="checkbox"/>	<input type="checkbox"/>	
(d) Requests for accommodations and/or accessible units?	<input type="checkbox"/>	<input type="checkbox"/>	
(e) Preferences?	<input type="checkbox"/>	<input type="checkbox"/>	
9. When a tenant/applicant notifies the owner/agent that he/she has been subject to unlawful discrimination, does the owner/agent provide the applicant/tenant with information about how to file a complaint with HUD?	<input type="checkbox"/>	<input type="checkbox"/>	Unable to Observe _____
10. Does the owner/agent maintain a record of fair housing complaints?	<input type="checkbox"/>	<input type="checkbox"/>	
11. Is there a local residency preference?	<input type="checkbox"/>	<input type="checkbox"/>	
If yes, was it approved by HUD?	<input type="checkbox"/>	<input type="checkbox"/>	Date of HUD Approval: _____

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

PART C

SECTION 504 REVIEW

The reviewer must complete this section to ensure compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504). **Please note that unsubsidized projects are not required to comply with Section 504, therefore if the project is unsubsidized, the reviewer may proceed to Part D.**

	YES	NO	COMMENTS
1. Is there a formal, written grievance procedure that provides for resolution of complaints alleging discrimination based on disability, as required by Section 8.53(b)?	<input type="checkbox"/>	<input type="checkbox"/>	
If Yes, document date procedures were adopted:			Date: _____
2. Does the owner/agent utilize a telecommunications device for the hearing impaired (TTY)?	<input type="checkbox"/>	<input type="checkbox"/>	
If No, Is there an alternative method? Describe under "Comments"	<input type="checkbox"/>	<input type="checkbox"/>	
3. When necessary, are auxiliary aides used to communicate with persons with disabilities? Describe under "Comments"	<input type="checkbox"/>	<input type="checkbox"/>	

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

PART D

DOCUMENTS REVIEWER SHOULD OBTAIN FROM OWNER/AGENT

The reviewer will only bring back documents upon request from FHEO. If the reviewer receives a request from FHEO to obtain certain documents, indicate in column a. During the on-site review, request the documents and indicate the status in columns b, c, or d. For items checked in column c, the reviewer must provide the owner/agent the FHEO address for forwarding the documents.

Document(s)	a. FHEO has requested that the reviewer obtain the following documents:	b. The document has been gathered and is attached to the Checklist	c. The Owner/ Agent agrees to forward the checked document to FHEO within ten (10) business days.	d. The document is not available.
For Part A				
1. Accessible Units/Program Accessibility, Sections I, II, and III (as applicable)		<input type="checkbox"/>		<input type="checkbox"/>
For Part B:				
2. Most recent Affirmative Fair Housing Marketing Plan (AFHMP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Any of the following documents that are used for outreach as specifically stated in the project's AFHMP or used for other affirmative fair housing marketing.				
Newspapers/Publications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copy of Radio Ads and Announcements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Copy of TV Ads and Announcements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Photograph of billboards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Letterhead	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Handouts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brochures and Leaflets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Photograph and site signs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (Specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Project Profile showing occupancy data (See Part B, Question 5).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Written Tenant Selection Plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Checklist for On-Site Limited Monitoring and Section 504 Reviews (Continued)

Project Name:

FHA/Project#

Section 8/PAC/PRAC#

<p>Please Note: The information below only pertains to Section 504 compliance. If this project is unsubsidized, the reviewer should not complete this section.</p>	<p>a. FHEO has requested that the reviewer obtain the following documents:</p>	<p>b. The document has been gathered and is attached to the Checklist.</p>	<p>c. The Owner/ Agent agrees to forward the checked document to FHEO within ten (10) business days.</p>	<p>The document is not available.</p>
For Part C:				
<p>6. Written Grievance Procedure (Part C, Question 3 and 24 CFR 8.53)</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>7. Application for Occupancy</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>8. Reasonable Accommodation Policy</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

FHEO requested that the reviewer observe the following:

The result of the observation is:

DOCUMENTS TO BE MADE AVAILABLE BY OWNER/AGENT**Project Name:****FHA/Project#****Section 8/PAC/PRAC#**

Instructions: Reviewers should place a check mark next to those items that must be available for review. Included in this list are FHEO staff instructions to provide MFH staff a list of requests for documents and special observations each year.

General Documents

- All Tenant Files and records, including rejected, transfer and move-out files
- Current waiting list
- Last advertisement and/or copies of apartment brochures
- HUD-approved Rent Schedule form HUD-92458
- Procurement Files
- Work Order Journals and Logs
- Cash Disbursement Journal
- Fidelity Bond
- Property and Liability Insurance
- Copies of the form HUD-52670 for the last twelve months, for each subsidy contract
- Current annual budget
- Quarterly budget variance reports
- Reserve for Replacement component analysis
- Copy of Rent Roll
- Copy of Application form
- Copy of lease, lease addenda and house rules
- Copy of Pet Policy
- Copy of Applicant Rejection Letter
- Annual Unit Inspections
- Fact Sheet “How Your Rent Is Determined”
- Copy of the “Resident Rights & Responsibility”
- Lead Based Paint Certifications
- EH& S Certifications
- All Operating Procedure Manuals
- Documentation for Elderly Preferences Under Sections 651 or 658
- Income Targeting and Tracking Log
- List of all current Principals and Board Members
- EIV Coordinator Access Authorization form(s) (CAAFs) – approved initial and current
- EIV User Access Authorization form(s) (UAAF) – approved initial and current
- EIV Owner Approval Letter(s)
- EIV Policies and Procedures
- Rules of Behavior for individuals without access to the EIV system
- Copy of TRACS Rules of Behavior, signed and dated
- Copy of TRACS and EIV requested Security Awareness Training Certificate, signed and dated
- Other

Civil Rights Front End Limited Monitoring and Section 504 Review Documents

- Affirmative Fair Housing Marketing Plan
- Tenant Selection Plan, including any approved residency preference
- Recent advertising
- Fair Housing logo and Fair Housing poster

State Lifetime Sex Offender Statistics

Project Name:

FHA /Project Number:

Section 8/PAC/PRAC Number:

Instructions: Reviewers should record the below statistics on households that include a household member who is subject to a state lifetime sex offender registration requirement.

1. Number of households where, in accordance with the owner’s policies and procedures, a household member subject to a state lifetime sex offender registration requirement was identified at re-certification. _____
Of the households identified at re-certification:

a. How many were admitted prior to June 25, 2001, the effective date of the Screening and Eviction for Drug Abuse and Other Criminal Activity final rule, and who had a household member subject to a state lifetime sex offender registration requirement at the time of admission? _____

NOTE: These households (admitted prior to June 25, 2001) must not be evicted unless they commit criminal activity while living in the federally assisted housing or have other lease violations.

b. How many were erroneously admitted? _____

c. How many households include a member that became subject to a state lifetime sex offender requirement after admission? _____

2. Number of evictions due to the erroneous admission of a household with a member subject to a state lifetime sex offender registration requirement? _____

Number of such evictions upheld in court. _____

3. Number of evictions due to a household member becoming subject to a state lifetime sex offender registration requirement after admission. _____

Number of such evictions upheld in court. _____