

CHAPTER ELEVEN
HOUSING REHABILITATION REQUIREMENTS
MONITORING AND COMPLIANCE REVIEW

General Instructions to Monitoring Staff:

This review should be conducted “on-site” at the local program office and work sites through review of grantee policies and procedures, examination of general files, inspection of actual case files selected at random by the Reviewer, and interviews of key staff and (as appropriate) contractors and property owners. The issues and concerns identified in this review of the grantee’s housing rehabilitation activities should be noted on the Housing Rehabilitation – Summary Page for Monitoring and Compliance Review found at the end of this chapter.

A. GENERAL INFORMATION

Date(s) of On-Site Review: _____

Grantee/Project Name: _____ Program Year: _____

Grant #: _____ Grant Term: _____

Local Staff (and Contractors and Property Owners) Interviewed:

| | | | | |
|-------|--------|-----------|--------------------|---------------------|
| Name: | Title: | Location: | Date of Interview: | Telephone #/e-mail: |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |

B. ISSUES FROM GENERAL PROJECT INFORMATION SUMMARY: *Note: Please refer to Section D of the General Project Information Summary (Chapter One). Any housing rehabilitation issues that emerged from the completion of Chapter One should be noted below and addressed through interviews with the local project staff and/or on-site file reviews. These issues can be addressed at the beginning of the monitoring visit, or at whatever point in the monitoring visit the Reviewer feels is appropriate.*

| Issues for On-Site Follow-Up | Related Questions/Citations | Grantee Response and/or Resolution |
|------------------------------|-----------------------------|------------------------------------|
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

Additional Instructions to Monitoring Staff:

HOUSING REHABILITATION

In performing the program monitoring and compliance review, DHCD staff must closely consider several aspects of the grantee's performance. These include the grantee's design of the program, its implementation of policies and procedures in compliance with pertinent Federal, State, and local regulations on a program-wide and an individual case-by-case basis, and its overall achievement of project objectives.

1. The Mayland CDBG Program requires that the grantee develop a written Policies and Procedures Manual for Housing Rehabilitation for use in implementation the local project. This document should be reviewed during the site visit to determine whether the manual provides adequate guidance to the grantee concerning its housing rehabilitation activities. In general, the manual should include:
 - Introductory section (including goals and objectives, authority, program resources, applicable laws and regulations);
 - Applicant eligibility requirements (including definitions of relevant terms, eligibility criteria, establishing applicant priorities, selecting eligible properties);
 - Basis for calculating applicants' household income;
 - Considerations in awarding of funds (including underwriting procedures, determining financial assistance levels), cooperation with contractors, handling of grievances, anti-conflict of interest and kickback provisions;
 - Eligible rehabilitation expenses (i.e. code compliance, equipment, enhancing accessibility, weatherization and energy conservation, building permits, fees, flood insurance, etc.);
 - Responsibilities of the local government officials and program staff;
 - Requirements for bid packages and construction contracts; and,
 - Description of close-out procedures (i.e. final inspection, final payment).
2. Individual case file reviews should be undertaken on at least three (3) of the properties rehabilitated through the project. A separate column on the checklist that follows should be filled out for each individual case file reviewed. **Fill in** the case file number (or other identifier) at the top of each column. If warranted, the Reviewer may review additional files on a separate sheet.
3. The Reviewer should review the general program files and also interview grantee staff and, as appropriate, contractors and property owners to determine whether the grantee's general practices are consistent with the policies and procedures stated in manual and with the regulations governing the program.

All issues identified during the on-site review of the grantee's housing rehabilitation activities should be noted on the Housing Rehabilitation – Summary Page for Monitoring and Compliance Review found at the end of this chapter of the Handbook.

PROJECT DESCRIPTION: Please provide a brief description of the project being monitored, based on the approved application, Grant Agreement and any amendments. The Reviewer can determine how much detail is useful to provide in this section, but typically the description should specify the project location(s), nature of activities being funded, amount of total funding and allocation among activities, and specific goals. (The Reviewer can use the General Project Information Summary forms in Chapter One to obtain much of this information.)

C. HOUSING REHABILITATION REQUIREMENTS

| HOUSING REHABILITATION CHECKLIST | Documentation Indicates that General Program Practice Consistent with Applicable Policies & Regulations | Sample Case #: _____ | Comments and Description of Documentation or Issues: |
|---|---|-------------------------|--|
| PROGRAM DESIGN AND DEVELOPMENT | | | |
| <p><i>Citation: Maryland CDBG Programs requires grantees conducting housing rehabilitation activities to develop a written policy and procedural manual.</i></p> <p>1. Written Policies and Procedures: Have local rehabilitation program guidelines (policies and procedures) been developed, approved by the local governing body, and incorporated in a written manual available to the public?</p> | Yes No | | If "No", explain: |
| <p>2. Program Goals/Regulations: Do the local guidelines clearly state goals and objectives of the project as well as authority for the project, source of funding, and applicable laws, regulations, and provisions?</p> | Yes No | | |
| <p>3. Roles/Standards: Do the written guidelines define the roles and responsibilities of all program staff, the property owner and the contractor, through all phases of program delivery (including code enforcement, standards for rehabilitation, and preparation of work write-up and cost estimate)?</p> | Yes No | | |

| HOUSING REHABILITATION CHECKLIST | Documentation Indicates that General Program Practice Consistent with Applicable Policies & Regulations | Sample Case #: <hr/> | Comments and Description of Documentation or Issues: |
|---|--|----------------------------|---|
| MARKETING AND OUTREACH | | | |
| <p><i>Citation: Title IV Civil Rights Act of 1964 (PL 88-352), Title VIII of Civil Rights Act of 1968 (Fair Housing Act), Maryland Human Rights Commission (Article 49B): No discrimination on any program or activity receiving Federal or State funds. Require grantee to conduct affirmative marketing.</i></p> <p>8. Marketing/Equal Opportunity: Do the local procedures provide a mechanism to market the program successfully to residents and homeowners and assure fair, equal and open treatment to all qualified potential project beneficiaries?</p> | <p>Yes No</p> | <p>Yes No</p> | |
| <p>9. Program Info: Are potential participants given the grantee's guidelines, including the type of assistance offered to clients, income limits, interest rate, loan or grant limits and conditions of eligibility; eligible rehabilitation expenses; and, dollar limit of work to be performed)?</p> | <p>Yes No</p> | <p>Yes No</p> | |
| <p>10. Applicants: How many qualified applicants have applied to the project to date?</p> <p>Total #: _____</p> <p>Has the project been successful in attracting adequate numbers of qualified applicants?</p> | <p>Yes No</p> | | <p>If "No", what actions is the grantee taking to solve this problem?</p> |

| HOUSING REHABILITATION CHECKLIST | Documentation Indicates that General Program Practice Consistent with Applicable Policies & Regulations | Sample Case #: <hr/> | Comments and Description of Documentation or Issues: |
|---|---|---|--|
| APPLICATION AND WORK WRITE-UPS | | | |
| <p>Citation: 24 CFR 570.506: Requires grantees to maintain records providing a full description of each activity.</p> <p>11. Individual Case Files: Does the grantee maintain well-organized and complete case files on the individual rehabilitation cases, including the following documentation:</p> <p>11.1 Current status?</p> <p>11.2 Property owner's application?</p> <p>11.3 Number of persons who live in the household?</p> <p>11.4 The income limit for a household this size?</p> <p>11.5 Verification of ownership and income of occupants?</p> | <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> | <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> | |
| <p>Citation: 24 CFR 85.20(b)(6) and 24 CFR 570.506: All program expenditures must be supported by source documentation.</p> <p>12. Scope of Proposed Rehabilitation: Does the grantee apply standards established in its policies and procedures manual to determine appropriate level of rehabilitation including preparation of written specifications?</p> <p>12.1 Inspection/Work Write-Up: Is there a copy of the original inspection/work write-up and cost estimate on file?</p> <p>12.2 Deficiencies: Did the work write-up include any specific deficiencies identified by the household in the application? (Handicapped features, etc.) Describe: _____</p> <p>12.3 Sign-off: Was the work write-up approved and signed by the owner?</p> | <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> | <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> <p>Yes No</p> | |

| HOUSING REHABILITATION CHECKLIST | Documentation Indicates that General Program Practice Consistent with Applicable Policies & Regulations | Sample Case #: _____ | Comments and Description of Documentation or Issues: |
|--|---|-------------------------|--|
| SPECIAL PROGRAM REQUIREMENTS | | | |
| <p><i>Citation: 24 CFR 570.483 – Rehabilitation of residential property must satisfy one of three National Objectives.</i></p> <p>13. Satisfaction of National Objective: Is there documentation that the individual rehabilitation cases satisfied a National Objective?</p> <p>How is this documented? _____</p> <p>_____</p> <p>(Use “Comments” column is more space needed)</p> | <p>Yes No</p> | <p>Yes No</p> | <p>Note approach used to satisfying the National Objective:</p> <ul style="list-style-type: none"> <input type="checkbox"/> LMI Area Benefit <input type="checkbox"/> LMI Housing <input type="checkbox"/> Slum or Blighted Area <input type="checkbox"/> Spot Blight <input type="checkbox"/> Urgent Needs |
| <p>14. Is this the same approach to satisfying the National Objective as had been proposed and approved in grantee’s application?</p> | <p>Yes No</p> | <p>Yes No</p> | |
| <p><i>Citation: 36 CFR 800 – Grantee must consult with State historic preservation officer to determine whether rehabilitation will affect historically significant properties.</i></p> <p>15. Historic Preservation: Is this project (or case) in compliance with Historic Preservation requirements (as applicable)?</p> | <p>Yes No</p> | <p>Yes No</p> | |

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|---|---|---|--|
| <p>Citation: 44 CFR 59-79 – CDBG funds cannot be used in identified flood hazard area unless flood insurance is secured through National Flood Insurance Program.</p> <p>16. Flood Insurance: Is there any evidence that units to be rehabbed were in a flood plain?</p> <p>If “Yes”, did such units obtain insurance through the National Flood Insurance Program?</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |
| <p>Citation: 24 CFR 35 – Measures must be taken to abate lead-based paint hazards and to provide notice to purchasers and tenants of housing regarding hazards.</p> <p>17. Lead Paint: Is there a lead-based paint determination in the file?</p> <p>Is there a signed and dated notification form by owner or tenant?</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |
| UNDERWRITING | | | |
| <p>Citation: 24 CFR 570.506 and 24 CFR 85.20(a)(20 and (b)(6): All program expenditures must be supported by source documentation.</p> <p>18. Qualification: Does the file documentation confirm that there is sufficient evidence to indicate that the eligibility criteria have been met?</p> <p>For the Household?</p> <p>For the Building?</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |

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|--|---|---|--|
| <p>19. Financial Assistance: Did the grantee determine appropriate levels and forms of financial assistance for individual rehab cases consistent with the project's policy and procedures, including requirements for collateral and matching financing?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>20. Property Owners: Does the grantee execute formal agreements with property owners for the financial assistance, reflecting all pertinent terms and conditions and stipulating the responsibilities of each party under the agreement?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>21. Secure and Service Loans: Does the grantee secure and service loans as established in the policies and procedures manual?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>22. Liens: Do the project files indicate that the appropriate liens have been filed?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>23. Promissory Note: Is there an executed promissory note on file? Is there a signed/dated Truth in Lending Disclosure Statement?</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |
| <p>24. Repayment Requirements: Does the agreement stipulate the procedures and schedule for repayment of any loan, the conditions under which default will be triggered, and the actions available to the grantee in the event of default?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |

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|---|--|----------------------------|--|
| RECAPTURE AND PROGRAM INCOME | | | |
| <p>25. Recapture: Does the grantee apply its default and recapture policies consistent with the policies and procedures manual?</p> <p>Number of cases where default/recapture has occurred: _____</p> | <p>Yes No</p> | <p>Yes No</p> | <p>Comment as necessary:</p> |
| <p>26. Program Income: Are loan repayments or recaptured grants accounted for as program income?</p> | <p>Yes No</p> | <p>Yes No</p> | <p>Comment as necessary:</p> |
| <p>27. Revenues: Does the grantee use revenues from loan repayments as established in the policies and procedures manual and the approved program income re-use plan?</p> <p><i>Citation: 24 CFR 570.489(e): Program income must either be returned to State or may be retained and re-used subject to State approval and in conformance with re-use plan.</i></p> | <p>Yes No</p> | <p>Yes No</p> | <p>Comment as necessary:</p> |

| HOUSING REHABILITATION CHECKLIST | Documentation Indicates that General Program Practice Consistent with Applicable Policies & Regulations | Sample Case #: _____ | Comments and Description of Documentation or Issues: |
|---|---|-------------------------|--|
| BIDDING AND CONTRACTOR SELECTION | | | |
| <p><i>Citation: Title IV Civil Rights Act of 1964 (PL 88-352) No discrimination on any program or activity receiving federal funds.</i></p> <p>28. Marketing to Contractors: Do guidelines identify process for recruiting contractors, particularly small, minority, and female contractors (including specification of minimum qualifications, evaluation of credentials, and measures taken in case of unsatisfactory performance)?</p> | Yes No | | |
| <p>29. Availability of Contractors: Does the project seem to have a sufficient number of contractors participating in the rehab program?</p> <p>Number of contractors currently actively participating: _____</p> | Yes No | | |
| <p>30. Bid Solicitations: Are copies of the bid solicitation documentation on file?</p> | Yes No | Yes No | |
| <p>31. Pricing: Were bids that received in-line with preliminary cost estimates?</p> <p>Cost Estimate: _____</p> <p>Bid Received: _____</p> | | Yes No | Comment as necessary: |
| <p>32. Competitive Procurement/Equal Opportunity: Were bids secured on a competitive basis in accordance with the project's guidelines, and referencing of Section 3 and E.O. 11246 in advertisements)?</p> <p><i>See 24 CFR 85.36 and Chapter Five – Procurement and Bonding</i></p> | Yes No | Yes No | If "No", explain: |

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|---|---|---|--|
| <p>33. Selection of Lowest Bidder: If the low bidder was not selected, is there documentation in the project file supporting this decision?</p> <p><i>See 24 CFR 85.36 and Chapter Five – Procurement and Bonding</i></p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>Citation: 24 CFR 85.36(i): Specifies provisions in grant contracts</p> <p>34. Content of Construction Contracts: Review the construction contract to verify the inclusion of the following:</p> <p>34.1 Cost of work to be performed and person(s) responsible for completing work items?</p> <p>34.2 Lead-based paint poisoning regulations?</p> <p>34.3 Davis-Bacon provisions, where applicable? (see Chapter Ten—Labor Standards)</p> <p>34.4 Fair Housing and Equal Opportunity provisions? (see Chapter Nine -- Fair Housing and Equal Opportunity)</p> <p>34.5 Contractor insurance and bonding provisions? (see Chapter Five – Procurement and Bonding)</p> <p>34.6 Section 3 clause?</p> <p>34.7 Conflict of interest clause?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>35. Workmanship: Does the contract include general rehabilitation specifications that adequately prescribe materials, methods and quality of workmanship?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>36. Consent: Does the contract stipulate the consent that is required for work to be approved and payments to be made for completed rehab work?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | <p>Comment as necessary:</p> |

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|---|--|-----------------------------|--|
| CONSTRUCTION | | | |
| 37. Construction Process/Scope: Do guidelines describe construction period procedures (including progress inspections, handling of complaints, final inspection, final payment, and process for resolving work deficiencies after the final inspection)? | Yes No | | |
| <p><i>Citation: 24 CFR 570.488 and 49 CFR 24: Grantees and subgrantees must minimize displacement and provide relocation assistance to eligible households.</i></p> <p>38. Relocation: Was it necessary to provide temporary or permanent relocation assistance to any persons as a result of the project?</p> <p>If "Yes", were these persons afforded all rights and payment provided under the Uniform Act (see Chapter Seven – Relocation)</p> | <p>Yes No</p> <p>Yes No</p> | <p>Yes No</p> <p>Yes No</p> | |
| <p>39. Notice to Proceed: Is there evidence that rehab work authorized by the project did not commence until a formal notice to proceed is provided by the grantee?</p> <p>Is a copy of the signed notice to proceed maintained in the project files?</p> | <p>Yes No</p> <p>Yes No</p> | <p>Yes No</p> <p>Yes No</p> | |

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|--|---|--|--|
| <p>40. Progress Inspections: Is there evidence that regular inspections of work were performed?</p> <p>40.1 Are there copies of the inspection reports on file?</p> <p>40.2 When/how frequently are the inspections performed?:</p> <p style="text-align: center;"><hr/></p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> <p style="text-align: center;"><hr/></p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> <p style="text-align: center;"><hr/></p> | <p style="text-align: center;">Identify the individual(s) who perform these inspections and their qualifications:</p> |
| <p>41. Actual Scope of Rehabilitation: From the evidence available from the case files and inspections of the work sites:</p> <p>41.1 Permits: Is there evidence that all local permits (e.g., electrical, etc.) were secured?</p> <p>41.2 Eligible Improvements: Are all work items consistent with project criteria for eligible improvements?</p> <p>41.3 Consistency with Work Write-Up: Was the rehab work undertaken consistent with the work write-up?</p> <p>41.4 Code Compliance: Are completed units in compliance with local codes?</p> <p>41.5 Change Orders: Are change orders documented, and does the evidence indicate such changes were reasonable?</p> <p>41.6 Quality: Does site inspection by the Reviewer confirm that the rehabilitation work was performed in a quality, professional, and timely manner?</p> <p>41.7 Reasonable Cost: Does inspection confirm that the rehabilitation cost was reasonable for the work entailed?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | |
| <p>42. Timeliness: What are grantee's methods to assure both timely completion of work and timely progress payments to contractors?</p> | <p>Describe methods briefly:</p> | | |

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|--|---|--|--|
| <p>43. Payments: Is there evidence that progress payments to contractors are only made:</p> <p>43.1 After an inspection has been completed of the billed work?</p> <p>43.2 After a determination that the work performed is consistent with the approved work write-up /specifications and standards of the program?</p> <p>43.3 When the billed costs are consistent with the contractor's accepted bid (including any approved amendments to bid)?</p> <p>See 24 CFR 85.20(b)(6).</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |
| CLOSE-OUT OF THE REHABILITATION CASE | | | |
| <p>44. Final Inspection: Was a final site inspection made upon receipt of a final invoice from Contractor?</p> <p>Is there a copy of the final inspection report on file?</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> <p style="text-align: center;">Yes No</p> | |
| <p>45. Contractor Release: Before making final payment, did the grantee obtain a contractor release, including releases from subcontractors and suppliers, of liens and a copy of each warranty due the applicant for the work?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | <p>If "No", please explain:</p> |
| <p>46. Owner Satisfaction: Is there evidence in the project files indicating that the applicant was satisfied with the work performed?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | <p>Explain process that was followed in the event that the applicant was not satisfied:</p> |
| <p>47. Final Payment: Is there evidence that final payment was made only after a final inspection had confirmed that all work had been completed to the project's satisfaction and the satisfaction of the property owner, and that appropriate warranties/guarantees were in place?</p> | <p style="text-align: center;">Yes No</p> | <p style="text-align: center;">Yes No</p> | <p>Comment as necessary:</p> |

OVERALL REHABILITATION PROCESSING

Instructions to Monitoring Staff:
 This section is **optional** and may be filled out if the Reviewer identifies issues related to performance goals and the overall sequence for processing of projects through the program.

Important Dates:

(Review case file to ensure that documentation is in place)

| | Case#1 | Case#2 | Case #3 |
|---|--------|--------|---------|
| • Date of final verification and completion of all household application data? | _____ | _____ | _____ |
| • Date of loan closing, if applicable? | _____ | _____ | _____ |
| • Date work write-up and cost estimate prepared? | _____ | _____ | _____ |
| • Date specifications sent out to bid? | _____ | _____ | _____ |
| • Date contract signed? | _____ | _____ | _____ |
| • Date notice to proceed issued? | _____ | _____ | _____ |
| • Dates of inspections? | _____ | _____ | _____ |
| • Date of final inspection? | _____ | _____ | _____ |
| • Date of final payment? | _____ | _____ | _____ |
| • Date lien or contract for deferred loan program filed at clerk of court's office? | _____ | _____ | _____ |

Important Timelines:

| | Days |
|--|-------|
| • How much time elapsed from the initial application to loan settlement? | _____ |
| • How much time elapsed from the loan settlement to contract award? | _____ |
| • How much time elapsed from the contract award to construction? | _____ |
| • How much time elapsed from loan settlement to final inspection? | _____ |

If any of these time frames is unreasonable, explain:
