HOME Investment Partnerships Program (HOME)

Subrecipient Orientation | June 28, 2023 | FY 2023-2024 |



Financial and Management Services Department, Financial Operations Division

Agenda

- 1. Welcome
- 2. Introductions
- 3. HOME HUD Basics
- 4. Participant Eligibility
- 5. Income Limits
- 6. Compliance & Reporting
- 7. Common Challenges

- 8. Q&A
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- 10. Federal Regulatory Regulations
- 11. Closing



Introductions



HOME – HUD Basics

- Moreno Valley ("City") is an "Entitlement City"
- The City is considered the HUD Grant Recipient (grantee).
- Each of you are Subrecipients (sub-grantees) carrying out activities identified in the City's <u>2023-2028 Five Year</u> <u>Consolidated Plan</u> and <u>2023-24 Annual Action Plan</u>



HOME Grant Objectives

- Expanding the supply of decent and affordable housing, particularly housing for low- and very low-income;
- Strategies for achieving adequate supplies of decent, affordable housing;
- Providing financial and technical assistance to participating jurisdictions; and
- Extending and strengthening partnerships among all levels of government and the private sector in the production and operation of affordable housing.



HOME Allowable Uses

New Construction

Conversion

Rehabilitation

• Site Improvements

Reconstruction



HOME Allowable Uses – cont.

- Acquisition of Property
- Acquisition of Vacant Land
- Demolition
- Relocation Costs



Project-Related Soft Costs

Examples Include:

- Finance-Related Costs
- Architectural
- Engineering
- Related Professional Services
- Tenant & Homebuyer Counseling

- Project Audit Costs
- Affirmative Marketing & Fair Housing Services to Perspective Tenants or Owners of Assist Project(s)



Maximum Per-Unit Subsidy Limit

	HOME Maximum Subsidy						
Bedrooms							
0	\$159,754						
1	\$183,132						
2	\$222,694						
3	\$288,094						
4+	\$316,236						



Requirements: Committing HOME Funds

- Necessary financing has been secured
- Budget and schedule has been established
- Underwriting is complete
- Construction is scheduled to start within 12 months
- NEPA is complete



Acquiring Land with HOME Funds

Under <u>2 CFR 92.205(a)(2)</u>, land can only be acquired for a specific local project, with construction scheduled to begin within 12 months of commitment.



Environmental Review Requirements

HUD environmental review regulations at <u>24 CFR Part 58</u> prohibit HOME funds or non-HUD funds from being committed to a project prior to completion of environmental review requirements.



Development Completion Timeline

Project completion deadline In accordance with <u>24 CFR</u> <u>92.205(e)(2)</u>, a PJ must complete each project within 4years of the date of commitment of funds to the project.



Development Completion Timeline – cont.

- Construction is scheduled to begin within 12 months
- Project completion must be achieved within 4 years
- All HOME-assisted homebuyer units must be sold to an eligible homebuyer within 9-months of construction completion
- All HOME-assisted rental units must have initial occupancy within 18- months of project completion



Participant Eligibility

- Household income must be verified to qualify benefited persons as Low and Very-Low income using HUD Income Limit table.
 - Verifying documents may include, among others, most recent tax return showing reported dependents, W-2's of household members, recent pay stubs, bank statements, etc.
- For rehabilitation projects, proof of home ownership is also required.
 - Verifying documents should include a title report, deed of trust and most recent property tax bill.



Income Limits

	Maximum Annual Household Income Limits as Determined by HUD effective May 15, 2023									
	# of Persons in Household									
	1	2	3	4	5	6	7	8		
Extremely Low Income (30%)	\$19,600	\$22,400	\$25,200	\$30,000	\$35,140	\$40,280	\$45,420	\$50,560		
Very Low Income (50%)	\$32,650	\$37,300	\$41,950	\$46,600	\$50,350	\$54,100	\$57,800	\$61,550		
ow Income (80%).	\$52,200	\$59,650	\$67,100	\$74,550	\$80,550	\$86,500	\$92,450	\$98,450		



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Reporting & Monitoring

- Participant Eligibility
- Monthly Performance Statistics
- Request for Reimbursement
- Monitoring



Common Challenges

- Monitoring identifies non-compliance of HUD regulations resulting in a Finding. Common Findings include:
 - Inadequate record keeping; Lack of adequate accounting policies and procedures and internal controls.
 - Monitoring identifies non-compliance of City Agreement resulting in a Concern. Common Concerns include:
 - Late filing of invoices; Incomplete reporting; Lack of promotion









HOME Specific Regulations & Policy

- Lead-Based Paint Testing (<u>24 CFR Part 35</u>)
 - Rehab and repairs on homes built prior to 1978. Some De Minimus rules apply allowing exemptions (<u>24 CFR</u> <u>Part 35.1350</u>).
- Prevailing Wages (<u>24 CFR Part 92</u>)
 - Prevailing wage required for projects containing cumulatively more than 12 units.



HOME Specific Regulations & Policy – cont.

- Rehab projects are subject to <u>HUD and City rehabilitation</u> <u>standards</u>.
- Full HOME regulations found in <u>24 CFR Part 92</u>.



Federal Regulatory Requirements

- Title 2 of Code of Federal Regulations Part 200 (<u>2 CFR Part 200</u>)-Uniform Administrative Requirements:
 - Conflict of Interest (<u>200.112</u>)
 - Standards of Financial Management (200.302)
 - Internal Controls (<u>200.303</u>)
 - Program Income (<u>200.307</u>)
 - Procurement Standards (<u>200.320</u>)
 - Monitoring (<u>200.329</u>)
 - Direct & Indirect Cost Principles (<u>200.412</u> & <u>200.413</u>)
 - Audit Requirements (200.501)



Federal Regulatory Requirements cont.

- Title 24 of Code of Federal Regulations Part 570 (<u>24 CFR Part 570</u>)-Basic provisions for all CDBG grants:
 - Eligible Activities; National Objectives
 - Records to be maintained
 - Labor standards (Davis-Bacon Prevailing Wage)
- Section 3 requirements for HUD awards in excess of \$200,000 for Covered Projects. Most CDBG and ESG programs are exempt.
- Various non-discrimination and affirmative action regulations.



HUD Exchange – CDBG Resources

- Register for <u>HUD Exchange Account</u>
- **Building HOME Online Training**
- HOME On-Demand Training



We're Here to Help!

Moreno Valley

Call: 951.413.3450

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