

Streamlining Compliance in Oregon Affordable Housing

Streamlining Compliance Protocol for Consolidated On-Site Monitoring

Clackamas County



The following protocol is intended to ensure all Streamlining participants follow consistent steps while performing on-site inspections and file reviews. This protocol will be updated periodically by the participating organizations as deemed appropriate. All documents required are available on the shared document hub at:

<http://www.oregon.gov/ohcs/Pages/compliance-monitoring-streamlining.aspx>

City of Eugene



Setting the Annual On-Site Monitoring Schedule and Appointing Lead Agencies:

By September 30 each year, the Streamlining Administrators (this task is currently assigned to OHCS) will prepare the initial monitoring schedule, setting out which properties are targeted for inspection in the coming year.

During October of each year, participating funding organizations will meet to determine which organization will be the Lead Inspection Agency and Lead Auditing Agency for each inspection.

By November 1 of each year, the schedule will be completed in order for the Agencies to start scheduling properties for the following year beginning with January inspections.

The Lead Agencies will identify an Auditor (who will complete the file review) and an Inspector (who will complete the physical inspections). The Inspector must have completed a Streamlining Inspection Training session or its equivalent (see Qualified Inspectors section below). The Auditor and Inspector could be the same person or the tasks could be divided between two different agencies. Regardless, the Inspector is the person who will coordinate the inspection and communicate with the Owner/Manager regarding any changes or questions about the monitoring visit.

Home Forward – for all streamlining inspections with Home Forward, once a date has been agreed upon for the inspection, OHCS and PHB will be completing the scheduling process. This includes sending the confirmation letter etc. Further, for all Home Forward owned properties, the streamlining of the inspection will consist of a coordinated site visit (separate inspections coordinated on the same day).

The Coordinated Monitoring Process:

1) Sixty (60) days prior to the On-site Monitoring Visit, the Inspector should send an email to the Auditor, Owner/Agent, and any other funders involved with streamlining to set an inspection date. After the date is set, the Inspector (inspection scheduler) should complete and send a Participating Funders Pre-Inspection Information form to all funders involved with the inspection to determine how funders wish to participate in the inspection/file review and confirm any special funder requirements. Once completed by all Funders participating in the inspection, a copy should be sent to the Inspector and the Auditor.

2) Forty-five (45) days prior to the scheduled On-site Monitoring Visit, the Inspector sends the Owner Confirmation Letter via email and copies the Auditor, Owner/Agent, and all other involved funders to let them know it has been sent. The Confirmation Letter email

Housing Authority
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Oregon Housing and
Community Services



Portland Housing
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City of Salem



Washington County



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includes the documents that are required to be completed and returned to the Auditor by the Owner/Manager pre-inspection inspection.

- 3) Fourteen (14) days prior, the Auditor confirms that the Owner/Manager has submitted a completed Tenant Data Sheet and all other documents including the Management Review Questionnaire and Resident Services Plan Report that are required pre-inspection.
- 4) A minimum of two (2) days prior to the On-site Monitoring Visit, the Auditor selects which units to inspect. These may include units that had outstanding issues in past inspections. Alternate units: Two to three more units than required are selected in case any units are not accessible on the day of inspection. The list of selected units is forwarded to the Inspector. Unit selection should be confirmed by the Inspector. Auditor should send copy of the previous inspection to Inspector if it showed areas of concern. Inspector must not pre-notify the site of units selected for the inspection.

The date of the On-site Monitoring Visit:

- 1) Inspector/Auditor explains the coordinated inspection and file review process to the managers and owners (if present), and explains the follow up steps and timeline. Inspector provides feedback document and explains the process.
- 2) Inspector completes the physical assessment of the property, following the Streamlining Inspection Guidelines.
- 3) Inspector notifies the auditor about any alternate units that were inspected, which units were not inspected and provide the reason/s why.
- 4) Auditor reviews files for compliance, this may be done either on-site or electronically. If electronic provide electronic instructions.
- 5) The Inspector should notify the Owner/Agent about any health and safety issues that are to be resolved within 24/72 hours. The Annual Inspection Immediate Action Required Items Form should be completed and left with the Owner/Agent at the site of the inspection.
- 6) NOTE THAT PHYSICAL INSPECTIONS AND FILE REVIEWS MAY BE COMPLETED ON DIFFERENT DAYS AND AT DIFFERENT LOCATIONS AT THE CONVENIENCE OF INSPECTORS AND AUDITORS.

Following the On-site Monitoring Visit:

- 1) One to three (1 to 3) days after inspection, the Inspector follows up with Owner/Manager on any 24/72-hour items to make sure that the items have been corrected and obtains completed form.
- 2) A maximum of fourteen (14) calendar days after the inspection the Inspector emails the physical report and photos to the Auditor.
- 3) A maximum of twenty-three (23) calendar days after the inspection, Auditor completes the Review Report, and emails it to the Inspector and other funders involved with the inspection for comment. Comments should be submitted back to the Auditor within 48 hours if any additions or changes need to be made to the report. If no response is received, the Auditor will assume that the report is satisfactory as written. It is preferred that the Inspector and other

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funders report back to the Auditor after reading the Review Report even if they do not have additions so the Auditor knows that they have read it.

- 4) A maximum of thirty (30) calendar days after the inspection, the Auditor emails the Final Review Report to the Owner/Agent, and all involved funders. Owner/Agent is given 30 days from the date of the report to submit a complete response.
- 5) A maximum of thirty (30) days after the Review Report, Auditor confirms that the response has been received from the Owner/agent and sends a copy of the response to all involved funders.
- 6) Within seven (7) days of receiving the submitted response from Owner/Agent to the Review Report, the Auditor reviews it to make sure that it is a complete response and that all items have been addressed and all documentation requested has been received.
- 7) A maximum of thirty (30) days after receiving the complete response from the Owner/Agent, Auditor notifies all involved funders that the review is being closed and sends the closing letter to the Owner/Agent with a copy to all involved funders.
- 8) Auditor provides other funders with a complete tenant file review checklist if requested.

Qualified Inspectors

Streamlined inspections can only be completed by UPCS Qualified Inspectors. Inspectors must follow Streamlining Inspection Guidelines including UPCS and Streamlining Compliance-Supplemental Inspection Standards of Practice. In addition to UPCS Qualification, inspectors become qualified by completing at least one of the following:

- 1) Attend an annual Streamlining Inspectors Training (which will be offered at least once per year), or
- 2) “Shadow” a Qualified Inspector on at least two (2) inspections (preferably with two different Qualified Inspectors) to learn the proper procedure and inspection reporting standards.

Monitoring Feedback

If any funder is dissatisfied with the quality of the physical inspection report or the file audit, they should contact the Inspector/Auditor and request that they provide additional information. If there are ongoing problems with a particular Inspector/Auditor, these issues should be reported to the Inspector/Auditors direct Supervisor or to Ryan Miller at OHCS.