

Streamlined Compliance Monitoring Protocol

Clackamas
County



City of Eugene



Housing
Authority of
Portland



OHCS



Portland
Housing Bureau



City of Salem



Washington
County



The following protocol is intended to ensure all entities participating in Oregon's Streamlined Compliance Monitoring follow consistent steps while performing the physical inspections and compliance reviews that include tenant file audits. This protocol may be updated periodically by the participating organizations as deemed appropriate. All relevant documents are available on the shared document hub on the Oregon Housing and Community Services Website at: <http://www.oregon.gov/ohcs/Pages/compliance-monitoring-streamlining.aspx>

Setting the Streamlined Compliance Monitoring Schedule

By November 30th each year, the Streamlining Administrators (this task is currently assigned to OHCS) will prepare the list of properties identified for review/inspection, in the coming year.

By December 15th of each year, the list of properties will be completed in order for the Agencies to start scheduling properties for the following year beginning with January inspections.

Each agency will identify an Auditor (who will complete the file review) and an Inspector (who will complete the physical inspections) relevant to their agency's role within this streamlined compliance monitoring process. Each Inspector must have completed a Streamlined Inspection Training session or its equivalent (see Qualified Inspectors section below). The Auditor is the person who will coordinate the inspection and communicate with the management agent and owner regarding the monitoring visit.

In most cases, the OHCS Compliance Analysts will be the auditors. However, if a streamlined compliance monitoring visit is scheduled between partners that do not include OHCS as a participant, those partners will determine who will be the auditor in place of the OHCS CA and who will be the Inspector. (See terminology below as used throughout this protocol).

Home Forward – for all streamlined compliance monitoring visits scheduled 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).

Terminology Used In This Protocol:

Auditor = Partner who will conduct the compliance review and tenant file review.

CA = OHCS Compliance Analyst who will complete the compliance review.

Inspector = Partner who will conduct inspection at property.

Monitoring visit = full, physical inspection of the property and compliance review with tenant file audit.

Report = the full compliance review and physical inspection report that will be sent to the management agent and owner by the CA.

Other Participating Funder = other funding who is a party to this streamlining process who is participating in a scheduled monitoring visit and is not the CA or Inspector.

Scheduling the Streamlined Compliance Monitoring Visit:

1) No less than Sixty (60) days prior to the monitoring visit, the CA and Inspector will collaborate to set the date of the monitoring visit of the property.

Collaboration at this stage will include:

- Completion & sharing of the Participating Funders Pre-Inspection Information form
- Determination made if compliance review will be conducted remotely and tenant file review will be conducted electronically
- Sharing of any special requirements of the on-site monitoring visit
- Sharing of any previous on-site monitoring visit issues; streamlining or otherwise that needs follow-up

2) Fifteen (15) days prior to the set date for the monitoring visit, the CA sends the management agent (copy to owner) the confirmation letter via email and copies the Inspector (and any other participating funders) to schedule the monitoring visit for the date set by the CA and the Inspector in step (1) above.

The confirmation email includes:

- Confirmation letter
- Management Review Questionnaire
- Resident Services Report Form
- HOME Monitoring Report Spreadsheet
- Rent roll with move-in dates

NOTE: The documents due prior to the monitoring visit should be submitted no later than seven (7) days prior to the scheduled visit.

3) Seven (7) days prior to the scheduled monitoring visit, the CA confirms that the management agent has submitted all of the required documents (outlined in the confirmation letter and in item (2) above). If they have not been submitted, the CA will send a reminder notice to the management agent (copy to owner).

NOTE: OHCS will provide instructions in the confirmation letter to the management agent (and owner) to obtain access to the OHCS ProCorem workcenter for the property for the purpose of submitting all the documents due prior to the monitoring visit. The Inspector will also obtain access to the OHCS ProCorem workcenter for this purpose.

4) A minimum of two (2) days prior to the monitoring visit, the CA and Inspector will collaborate to determine which units and tenant files will be inspected and reviewed. For the physical inspection, alternate units should be chosen in case any issues arise with the chosen units while at the property.

Conducting the Streamlined Compliance Monitoring Visit:

1) The Inspector/CA explains the coordinated inspection and compliance review process to the managers and owner (if present); including the follow-up steps and the expected timeline for response submission and closing process.

2) The Inspector completes the physical inspection of the property including the chosen units following current Streamlining Inspection Guidelines/UPCS.

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3) The Inspector notifies the CA about any alternate units that were inspected, which units were not inspected and provides reason/s why. If the Inspector needs the CA to review the tenant file for the alternate unit that was chosen for HOME program purposes, this must be communicated to the CA as well.

4) The CA conducts the compliance review and reviews the chosen tenant files for compliance (chosen file may or may not include alternates based on the needs of the HOME program and units inspected). If the tenant file review is being conducted electronically, the list of files required for review will be sent to the management agent on the day of the on-site monitoring visit with instructions for upload into the ProCore workcenter.

5) The Inspector will notify the management agent (and owner) about any health and safety issues found during the inspection that are to be resolved within the required 24/72 hour period. The OHCS Exigent Health and Safety Notification form will be completed listing all items for correction in this category and left with the management agent along with instructions at the conclusion of the monitoring visit.

NOTE: Compliance reviews may be conducted remotely by the CA at the OHCS office with tenant files reviewed electronically. Full instructions will be provided to the management agent (and owner) when the review will be conducted remotely in the confirmation letter.

NOTE: The CA and Inspector will provide the list of tenant files to be reviewed and the units to be inspected NO EARLIER than the day of the on-site monitoring visit. Early notification is not allowed.

Following the Streamlined Compliance Monitoring Visit:

1) A maximum of fourteen (14) calendar days after the monitoring visit was conducted, the Inspector emails their findings (in template format) and any additional information such as photos to the CA to be included in the Report.

2) A maximum of twenty-three (23) calendar days after the monitoring visit, the CA completes the full Report and emails it to the Inspector (and other participating funders) for collaboration; comment and consensus. Collaboration must occur right away and any additions/changes that are needed in the Report must be provided back to the CA promptly within 48 hours. If NO response is received, the CA must assume that the Report is satisfactory as written.

NOTE: In the continued effort of collaboration, it is preferred that the Inspector report back to the CA after reviewing the Report even if they are in agreement with the report as written and do not have any additions to make.

3) A maximum of thirty (30) calendar days after the monitoring visit, the CA emails the final Report to the management agent and owner and copies the Inspector (and other participating funders). The management agent (and owner) is given 30 days from the date of the Report to submit a complete response.

NOTE: Extensions to submit the response may be requested from the management agent (and owner). The CA will inform the Inspector when an extension has been requested. Extensions longer than 30 calendar days should not be granted without extenuating circumstances presented.

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- 4) A maximum of thirty (30) calendar days after the Report was issued to the management agent (and owner), the CA confirms that the response has been received as required and forwards a complete copy to the Inspector.
- 5) Within seven (7) days of receiving the submitted response from the management agent (and owner) the CA and the Inspector must review to make sure that it is complete, all items have been satisfactorily addressed and includes all documentation requested. If all items have not been addressed or provided the CA must communicate with the management agent (and owner) to obtain the required items in a reasonable amount of time (generally within 2 weeks depending on the situation). The CA and Inspector will collaborate about what is needed and how much time to allow if more than two weeks is needed.
- 6) The CA and the Inspector collaborate to determine the appropriate rating for the monitoring visit. The CA brings it to the OHCS closing meeting process prior to closing. If any changes to the rating is determined in that process, further collaboration will take place between the CA and the Inspector. The CA will notify the Inspector of the change in rating determined in the process and allow for further input/feedback.
- 7) A maximum of thirty (30) days after confirming a complete and satisfactory response has been received from the management agent (and owner) and an agreed upon rating has been determined, the CA issues the closing letter to the management agent and owner and copies the Inspector.

Qualified Inspectors

The physical inspection portion of the monitoring visit can only be conducted 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 Streamlined Compliance Monitoring Inspectors Training
(Which will be offered at least once per year)
- 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.

Process Feedback

If any funder is dissatisfied with the quality of the physical inspection, the compliance review or the Report, they should contact the CA, the Inspector and request they provide additional information. If there are ongoing problems with a particular CA or Inspector, these issues should be reported to the CA's or Inspector's direct supervisor and/or to Rebecca Delmar at OHCS.