

Streamlining Compliance in Oregon's Affordable Housing

January 8, 2010



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With special thanks to the funders of the Streamlining Compliance Project:



Cover Photos: The affordable housing developments highlighted on the cover provide examples of many projects across Oregon that would benefit from Streamlining Compliance. Owners of each of these projects are required to report to between two and four of the housing funders participating in the Streamlining Compliance Project. Thank you to Community Partners for Affordable Housing, St. Vincent de Paul, Umpqua CDC, and Northwest Housing Alternatives for allowing us to use photos of their projects to represent hundreds of other housing projects that serve people and communities throughout Oregon.

For information about this project, contact Housing Development Center, 847 NE 19th Avenue, Ste 150, Portland, Oregon 97232, Ph. 503-335-3668, www.hdc1.org

Streamlining Compliance in Oregon's Affordable Housing

Executive Summary:

Compliance and inspection requirements are essential to ensure that affordable housing serves the targeted populations, that federal funding and private investment continue to flow to Oregon, and that our affordable housing units are well maintained assets for our communities. However, most projects receive funding from multiple public agencies, in addition to private investors, foundations, and lenders, and because each funder requires its own set of reports and inspections, the administrative cost of compliance can be very high.

The Streamlining Compliance Project, a project of the Housing Development Center (HDC), was kicked off in 2009 to address the challenge of compliance that had been documented by nonprofits in Oregon, as well as state and national organizations. The project received both collaborative and financial support from Oregon Department of Housing and Community Services (OHCS), the City of Portland, the Housing Authority of Portland, the Metro Multifamily Housing Association, and the Oregon Opportunity Network (Oregon ON), with a major contribution from the Meyer Memorial Trust. A **Funders' Work Group** of housing lenders, funders, and managers was convened to define the scope and to provide oversight to the project. The lenders and funders participating in this project are those who readily identified a concern about compliance costs, and who were committed to trying to coordinate their efforts. It is likely that other lenders may be interested in becoming involved as they see the progress that has been made toward coordination of compliance requirements.

The project has been managed by HDC and staffed by HDC Asset Manager, Molly Rogers, and two consultants, Margaret Mahoney and M.A. Leonard. The Funders' Work Group adopted the following goals for the Streamlining Compliance Project:

- Minimize the costs of compliance and reporting for both jurisdictions and project sponsors while meeting the regulatory requirements and ensuring the public benefits and long term viability of the projects.
- Create an information system that will inform the affordable housing underwriting process about the real costs of operating affordable housing for both long term physical and financial viability.

Four subcommittees, made up of members of the Funders' Work Group, other representatives of their organizations, and representatives of affordable housing owners and property management firms, were convened to provide technical input. These four subcommittees met from April through November, 2009, to review the existing compliance requirements of the participating funders, compare these to the Combined Funders' Compliance Program in Washington State, and to formulate recommendations on how to adopt a coordinated compliance program in Oregon.

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The Funders' Group, made up of representatives of the lenders participating in this Streamlining Compliance Project, is recommending the adoption of a **Coordinated Compliance Program** that incorporates the following elements:

- A. A jointly signed Memorandum of Understanding (MOU) committing to a Coordinated Compliance Program that will:**
 - 1. Reduce the burden of the compliance monitoring of housing projects participating in housing finance programs offered by OHCS, HOME participating jurisdictions, and NOAH;
 - 2. Reduce the cost of and improve the administration of compliance monitoring; and
 - 3. Provide better customer service to owners and residents living in affordable housing developments assisted by all of these public and nonprofit entities.

- B. The regular convening of the member lenders to:**
 - 1. Prepare an annual calendar of coordinated and shared responsibility for required inspections/site monitoring;
 - 2. Develop and maintain joint forms and procedures;
 - 3. Promote training of lender compliance officers and owner representatives on the requirements of the Coordinated Compliance Program; and
 - 4. Serve as a forum for problem solving on jointly funded projects and for identifying strategies for workouts or other assistance to improve troubled projects.

- C. The adoption and use of common reporting formats for project financial information, tenant data, and project profiles to eliminate duplication of reports and to provide consistent information to all participating lenders.**

- D. The adoption and use of the Uniform Physical Condition Standard (UPCS) as a common inspection standard** for properties receiving tax credits, state bond funding, HOME and CDBG funds, as well as local bonds and general funds, and the development of common forms and procedures for recording inspection results and tracking inspection follow up actions.

- E. The coordination of site visits for file reviews and inspections to eliminate redundant visits and reduce costs and intrusions on project residents.**

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- F. The testing and refinement of the recommended reporting formats, procedures and data collection methods through a Pilot Project.**

Each HOME Participating Jurisdiction that is party to the MOU authorizing the Coordinated Compliance Program will amend its Adopted Consolidated Plan to identify the common process being used by the group and how each entity coordinates monitoring and inspections and accepts reports from other jurisdictions participating in the group.

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Background:

This project is an outgrowth of work of the Community Development Network, now the Oregon Opportunity Network's (Oregon ON) Property and Asset Management Working Group (PAMWG), a best practices group with representatives from nineteen nonprofit affordable housing owners in Portland and Northwest Oregon. HDC has facilitated PAMWG for more than seven years. Almost two years ago, members of this group identified duplicative reporting as one of the key barriers to long-term sustainability of the affordable housing industry.

In 2007 HDC, with the help of PAMWG, conducted quantitative and qualitative research of more than 20,000 affordable housing units across the state to evaluate barriers to financially stable operations. Owners and property managers documented average reporting and inspection costs of over \$400 per unit, per year, almost 10% of their total project operating costs. Small and medium size owners (those with fewer than 600 units) and those with smaller projects, consistently report higher per unit compliance and reporting costs – an indication that external funder requirements impose a greater burden for smaller and startup organizations.

Duplicative reports and onsite inspections utilize precious nonprofit staff time, raise property management costs charged by third party managers, and are a significant disturbance to residents of affordable housing, who must open their homes to inspectors four to six times a year. The data collected by PAMWG demonstrates that the practices of the public funders are duplicative: each jurisdiction has separate forms, timelines, and procedures, but often collects the same information.

These findings produced by HDC, working with the PAMWG, showed results similar to a study done by LISC, a national housing intermediary, in the San Francisco Bay Area in 2006. LISC's study of 66,000 affordable housing units in the San Francisco Bay area, found that the average annual compliance activities for properties with five or more funding sources requires 63 FTE hours per property, and an additional



A packed house listens as Molly Rogers, HDC, presents the Draft Streamlining Compliance Report to Oregon ON's Property and Asset Management Work Group (PAMWG)

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two to 30 Full Time Equivalent days of staff time to prepare for inspections. (LISC, 2006). The Portland Policy Council of Oregon ON incorporated the research on compliance costs into its *2007 Owners' Report* and placed a high priority on reducing administrative compliance costs, thus freeing up staff time to address critical issues in their portfolio.

The Streamlining Compliance Project has attempted to identify the costs of compliance experienced by the participating lenders. However, since the lenders vary considerably in portfolio size, it is difficult to compare their costs per unit. Those lenders responding to a survey all agreed that their compliance workload had increased significantly since 2000, and that the implementation of a coordinated compliance program in Oregon would have the effect of reducing the amount of staffing dedicated to compliance. They indicated that the greatest savings could be generated through the reduction in time spent by multiple lenders in overlapping site inspections and field review of tenant data and files. Local HOME participating jurisdictions indicate that although their portfolios are growing, their HOME administrative funding remains flat or is decreasing. There is no provision in the HOME and CDBG grant programs to increase administrative allowances as housing portfolios grow.

In contrast to Oregon's current system, in Washington State, two state agencies and a number of local public agencies have been working together for more than eight years under inter-agency agreements to use a common reporting format and to share compliance work.

Using the experience gained by Washington organizations, the Streamlining Compliance Project has been bringing Oregon's housing funders and housing project sponsors/owners together in a collaborative effort to reduce the time and expense of compliance reporting.

"At a typical LIHTC property in Portland, Oregon we would have an average of four physical inspections annually, and three different financial formats reported at least annually. Additionally we would report tenant demographics and eligibility data in three to five different formats. With the Combined Annual Funders Report and consolidated inspections schedules that exist in Washington we would see one to two physical inspections and one format for all reporting. The savings based on these facts alone in Washington are three times over.

The efficiencies that exist or can exist certainly do not stop there. When agencies and lenders work together to define the standards for inspections, financial and compliance reporting it is easier for us to streamline our process to accommodate it."



**Dave Bachman,
Managing Principal
and CEO,
Cascade Management**

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HDC estimates that a coordinated system such as Washington's, but with online reporting (Washington's current upgrade), could reduce affordable housing owners' compliance costs by one-half. A project inventory completed as part of the Streamlining Compliance Project found that more than 86% of the 20,374 units that would be included in a Coordinated Compliance reporting portfolio currently report to at least two of the funding agencies each year. HDC estimate that a coordinated system could save project sponsors \$2.5 to \$5 million dollars a year across Oregon (\$142 per unit per year). Public funders would also see potential savings for their agencies, as they struggle to cover compliance costs on increasingly large portfolios with stagnant or reduced administrative budgets. These cost savings could provide the public dollars necessary to produce 25-50 additional units of affordable housing annually.

How the Streamlining Compliance Project has been organized:

A Funders' Work Group of representatives from each of the participating lenders (Oregon Housing and Community Services, Network for Oregon Affordable Housing (NOAH), the Housing Authority of Portland, and the eight local governments who receive HOME and CDBG funding from HUD) plus a representative from the HUD Portland Office, was formed to oversee the project. The lenders and funders who have participated thus far in the Streamlining Project represent state and local lenders who expressed interest in reducing compliance costs and who have control to a great extent in how they carry out their compliance responsibilities. It is possible that as the existing group of lenders successfully implement these strategies that other national level funders may want to participate. This has been the experience of the Public Funders Group in Washington State.

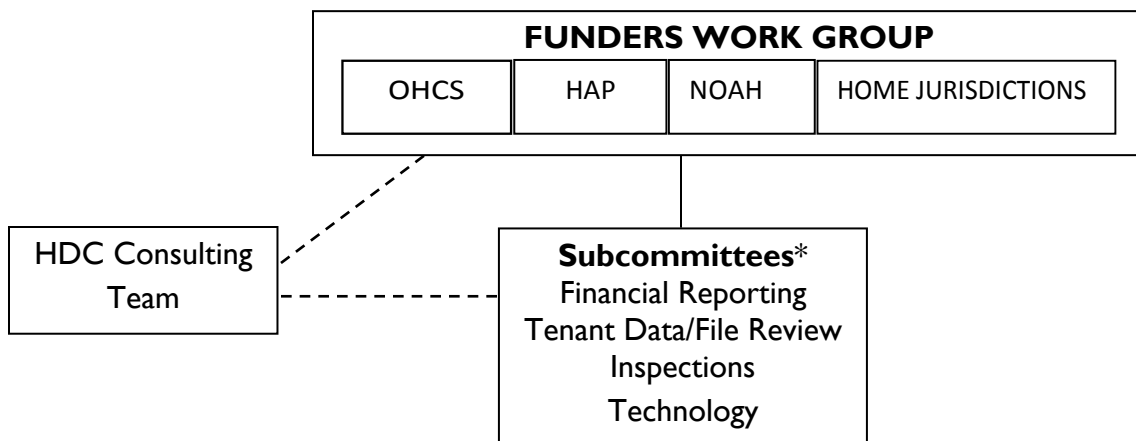
The Funders' Work Group identified the following specific outcomes expected from this collaborative effort:

- Defining common standards and terms for inspections and other reporting requirements needed in a common reporting format.
- Reaching agreement about terms and definitions used in the compliance system, with the goal of meeting regulatory requirements, and developing an efficient system to identify critical risk factors of project performance.
- Agreeing upon responsibility for components of a shared compliance system among the various jurisdictions, with the goal of reducing duplication and encouraging information sharing.
- Outlining the business terms of developing and implementing a shared system, resulting in signed Memoranda of Understanding among the jurisdictions.
- Streamlining compliance reporting for affordable housing in Oregon will reduce costs, freeing up dollars to meet other critical needs of affordable housing

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owners, such as reducing rents to residents, minimizing staff time to allow focus on long range planning for their properties, building capital reserves or funding important services for residents.

To carry out the work of establishing common definitions, procedures, and reports within the compliance system, four subcommittees were formed. The initial three subcommittees focused on Inspections, Financial Reporting, and Tenant Data/File Review. The subcommittees have been comprised of representatives from the participating lender organizations, project owners, and management firms. A fourth subcommittee focused on technology was appointed in August, 2009 to examine options for automating the recommended common reporting formats. From April, 2009 to November, 2009 more than 37 subcommittee members from 20 different organizations across the state have been engaged in discussions and analysis of the current compliance system, focusing on opportunities to consolidate and coordinate compliance efforts.



*Includes participating lenders, owners and managers

Work Done by the Streamlining Subcommittees:

Each of the three initial subcommittees began their work by compiling a data map of all reporting elements from each of the existing compliance reporting forms of the participating lenders: OHCS, NOAH, and the various HOME participating jurisdictions. The duplicated data maps for each compliance area (financial reports, tenant data, and physical inspections results) were analyzed by the respective subcommittees. Each subcommittee then debated the differences and developed a consensus set of data elements and definitions. The subcommittees also looked at how the Combined Public Funders' System in Washington State had evolved, and drew on the experience of the state and local agencies participating in that process.

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The research done by each of the subcommittees confirmed the findings of Oregon ON's Property and Asset Management Working Group that an average affordable housing project in Oregon could have three to five separate physical inspections in a year, submit three different financial reports, and submit three to five different reports on tenant income and demographic data. The differing financial report formats require project owners and managers to combine and recombine expense line items in differing ways for each report. Another observation that came out of reviewing the various forms by each subcommittee was that different data on the project, such as building types and locations, were requested with each separate report under the current compliance system. If a common "Project Profile Data" form could be developed, the information could be collected once and retained for reference by all participating lenders. The subcommittee members also observed that some critical "project information" was not collected and retained, such as the names and contact information for the design team, the amounts and sources of initial project financing, history of refinancing, warranty dates, etc.

Each subcommittee reached consensus on the data elements and their definitions for each component of monitoring: financial information, tenant data, and physical inspections. The final recommended common data elements are shown in Appendices 1 to 4 of this report.

As each subcommittee worked through the process of developing common data elements, the members also discussed the benefits of working together. The subcommittee members agreed that by coordinating their compliance they would not only stand to reduce compliance costs, but would be in a better position to identify distressed properties at an earlier stage and be able to work together to prevent loss of affordable housing units.

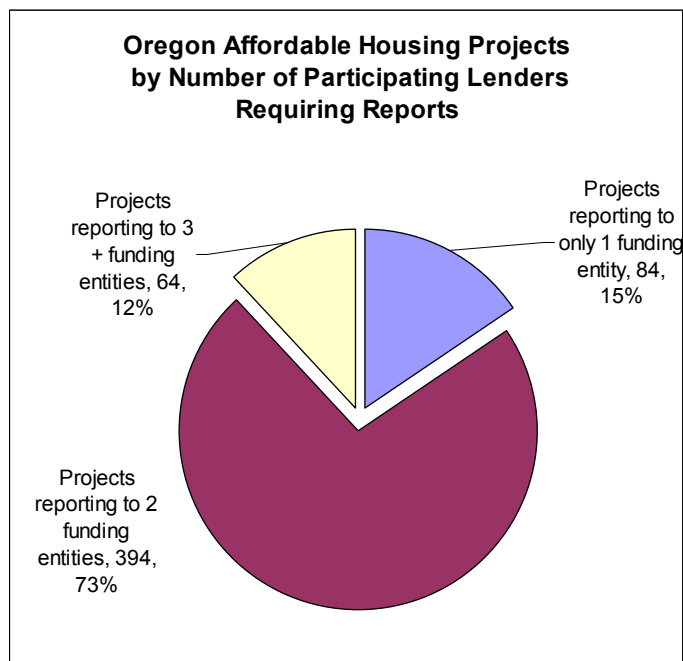


By reviewing the portfolios of each of the Streamlining Compliance Project's participating lenders, HDC was able to identify the number of jointly funded projects. This process was difficult to accomplish due to the fact that there is no common identifier for each project that is shared by the joint funders. In addition, lenders often identify their projects by different names for the same projects. The chart below shows

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the number of housing projects jointly funded by the lenders participating in the Streamlining Compliance Project. Twenty seven percent (27%) of the projects report to three or more of the participating lenders, an indication of the degree of duplicative reporting and inspection requirements.

The Technology Subcommittee, appointed by the Funders' Work Group in August, was charged to develop recommendations for implementing the recommended consolidated reports in electronic form with the estimated cost impact of each option, and to make suggestions for how to provide on-going management and maintenance for a combined reporting system. The subcommittee developed a schematic proposal for an optimal database to manage all reports in a coordinated compliance program. The subcommittee also



recommended a low cost application (MS SharePoint) to be used during the Pilot Project to manage submission and downloading of reports, as well as providing a forum for tracking progress and to support evaluation of the project.

At two points during the course of the project the Oregon ON sponsored public meetings where the results of the Funders' Work Group agreements were presented and input was received from almost 100 representatives of community development corporations, housing authorities and property management firms.

The feedback from participants at these meetings was overwhelmingly in support of the recommendations to establish a coordinated compliance program. At each of these events input from the participants also were able to offer further improvements to the concepts being developed by the Funders' Work Group and its subcommittees.

The Oregon Coordinated Compliance Program:

The subcommittees developed strategies for the implementation of an Oregon Coordinated Compliance Program, suggested formats and developed common definitions for compliance reporting, and identified methods for testing their

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recommendations through a Pilot Project. The representatives of the lenders participating in this Streamlining Compliance Project have considered each of these recommendations and the design for the suggested Pilot Project. The Funders' Work Group members are recommending to their respective agencies that they adopt a **Coordinated Compliance Program** based on the following elements:

- A. A jointly signed Memorandum of Understanding (MOU, Appendix 5) committing to a Coordinated Compliance Program that will:**
 - 1. Reduce the burden of the compliance monitoring of housing projects participating in housing finance programs offered by OHCS, HOME participating jurisdictions, and NOAH;
 - 2. Reduce the cost of and improve the administration of compliance monitoring; and
 - 3. Provide better customer service to owners and residents living in affordable housing developments assisted by all of these public and nonprofit entities.

- B. The regular convening of the member lenders to:**
 - 1. Prepare an annual calendar of coordinated and shared responsibility for required inspections/site monitoring;
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 - 4. Serve as a forum for problem solving on jointly funded projects and for identifying strategies for workouts or other assistance to improve troubled projects.

- C. The adoption and use of common reporting formats for project financial information, tenant data, and project profiles to eliminate duplication of reports and to provide consistent information to all participating lenders.**

- D. The adoption and use of the Uniform Physical Condition Standard (UPCS) as a common inspection standard** for properties receiving tax credits, state bond funding, HOME and CDBG funds, as well as local bonds and general funds, and the development of common forms and procedures for recording inspection results and tracking inspection follow up actions.

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- E. The coordination of site visits for file reviews and inspections to eliminate redundant visits and reduce costs and intrusions on project residents.
- F. The testing and refinement of the recommended reporting formats, procedures, and data collection methods through a Pilot Project.

Each HOME Participating Jurisdiction that is party to the MOU authorizing the Coordinated Compliance Program will amend its Adopted Consolidated Plan to identify the common process being used by the group and how each entity coordinates monitoring and inspections and accepts reports from other jurisdictions participating in the group.

“Our portfolio of affordable housing continues to grow. We cannot continue to approach our work in the same way; we need to find new ways to work together. I am excited that the Streamlining Compliance project will indeed save costs and help us be more effective.”

Marlys McNeill
Asset Property Management Division Administrator
Oregon Housing & Community Services



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The Streamlining Compliance Pilot Project Overview:

The Funders' Work Group has agreed that a significant amount of work has been accomplished in designing the key features of a coordinated compliance program. To test the recommended approach, the participating lenders agreed to actively test and evaluate the agreed upon concepts. The Funders' Work Group is recommending a six-month **Pilot Project** to be launched in early 2010. The objectives of the Pilot Project are to:

1. Provide a chance for the participating agencies to modify their existing monitoring system with the new streamlined concepts and apply them to a limited number of housing projects, without affecting the current monitoring process of the separate agencies;
2. Demonstrate whether the planned changes result in time and cost savings for lenders and owners;
3. Allow the participating lenders to refine the streamlined concepts as they see results;
4. Determine the costs of full implementation of the streamlined monitoring approaches;
5. Test electronic reporting formats and data collection methods with limited upfront investment;
6. Design and test the governance structure for a joint monitoring program that may involve ten or more agencies; and
7. Provide early visibility of the new pilot system to management of the participating lenders as well as users (project owners and property management firms).

The Funders' Work Group suggested that approximately 25 jointly funded projects be selected for the Pilot Project. These 25 or so projects should represent:

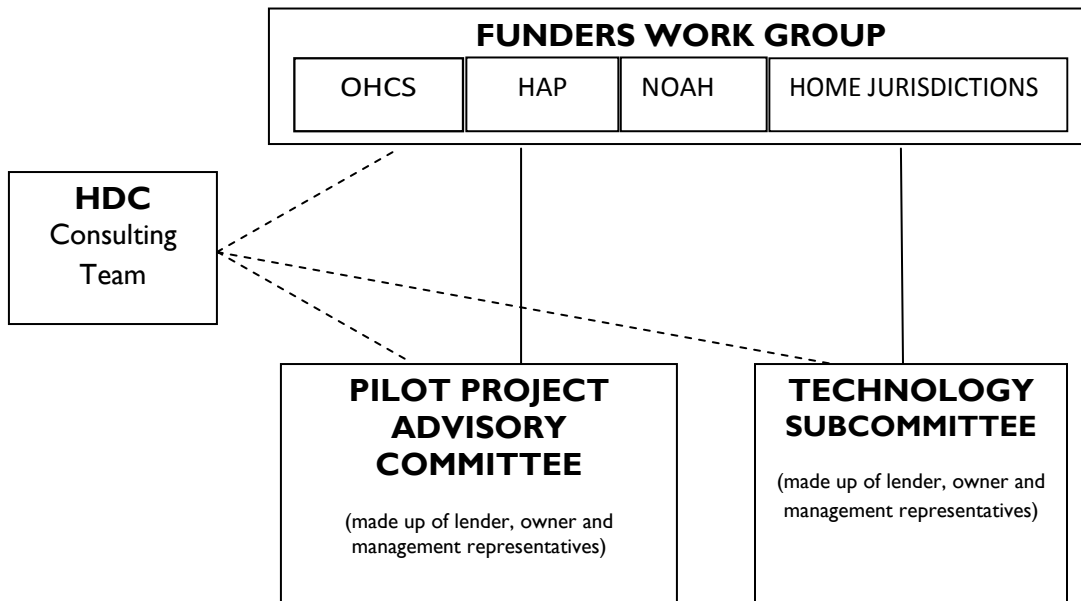
- Most, if not all, of the lenders/funders participating in the Streamlining Compliance Project (OHCS, NOAH, HAP, Washington County, Clackamas County, and the cities of Beaverton, Corvallis, Eugene, Gresham, Portland and Salem);
- Project size of 25 or more units, so that they meet the threshold for annual inspections on HOME financed units;
- Projects utilizing different funding sources that incorporate requirements for financial and tenant reporting as well as physical inspections;
- A mix of project types: family housing and senior housing.

Through the Pilot Project each of the recommended reporting formats, definitions and protocols will be tested and refined. The Funders' Work Group will recommend a final

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design based on feedback from all participants. Through cost data collected during the Pilot Project, the Funders' Work Group will be able to evaluate the savings that can be achieved, as well as the costs of moving to full implementation. The Funders' Work Group recommended that the Technology Subcommittee continue to meet on a regular basis (probably every other month) to ensure that the temporary platform used for data collection is functioning, to review feedback from participants, and to evaluate the best options and costs for a permanent data collection application.

The Pilot Project will be managed similar to the first phase of the Streamlining Project, with the Funders' Work Group continuing in its policy direction role. In addition, representatives will be drawn from the members of the existing Streamlining Compliance Project subcommittees to form a Pilot Project Advisory Committee to facilitate the implementation of the Pilot Project. The Technology Subcommittee will continue to provide guidance in the use of the SharePoint software and in developing recommendations for longer term electronic reporting options. The Funders' Work Group will review and synthesize Pilot Project results and make recommendations to the management of each participating lender on how to move to full implementation of Oregon's Coordinated Compliance Program.



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Pilot Project Tasks:

The work elements to be undertaken during the Pilot Project will include the following:

1. **Financial Management Reporting**
 - a. Refine the test reporting format and instructions for completing reports,
 - b. evaluate financial reports submitted during the Pilot Project test period,
 - c. develop common performance measures and common procedures for identifying and addressing troubled projects.
2. **Physical Inspection:**
 - a. Carry out training for representatives from each participating agency on the UPCS and the test reporting format;
 - b. review inspection results; determine best methods for sharing inspection results among participating agencies;
 - c. review data on physical inspections costs and the savings achieved through reduction in the number of lenders conducting their own inspections;
 - d. seek input from owners on reduced resident intrusion; and recommend refinements for full implementation.
3. **Tenant Data and File Review**
 - a. Refine the reporting format for collecting tenant data;
 - b. develop protocols for carrying out file reviews;
 - c. determine range of methods for transmitting tenant data to reviewing agency;
 - d. determine how physical monitoring & desk monitoring can be used to complete the required compliance checks;
 - e. evaluate results and collect cost data; recommend refinements for full implementation.
4. **Technology Implementation**
 - a. Recommend interim electronic means of collecting required data during the Pilot Project;
 - b. Monitor use of SharePoint or other interim data collection software used during the Pilot Project and respond to user needs and suggestions;
 - c. Evaluate existing electronic data systems to recommend the most effective, least costly method for collecting data for full implementation of the Coordinated Compliance Program.

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5. Project Evaluation

- a. Develop an overall evaluation protocol for the Pilot Project that may include:
 - i. Tools for collecting data from lenders and project owners and managers to monitor costs of compliance activities under the Pilot Project;
 - ii. Comparison projects for which lenders and project owners agree to provide data to demonstrate costs of regular compliance activities;
 - iii. Opportunities for lenders, owners and managers to provide feedback during the Pilot Project on their experiences in using the coordinated reporting formats and to collect suggestions for further improvements;
- b. Prepare a report of findings from the Pilot Project, describing the results of the Pilot, costs of the coordinated compliance activities in comparison to regular compliance approaches, and recommendations for how to proceed with full implementation of a Coordinated Compliance Program.

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Estimated Cost and Timeline for Phase II – The Pilot Project and Planning for Full Implementation:

HDC has developed, and the Funders Work Group has endorsed the following project budget and implementation timeline for Phase II of this Project:

Streamlining Compliance Pilot Project Budget

Contingent on funding, a contracted Project Management Team will work under the direction of the Funders' Work Group to assist in the further design of the Pilot Project, provide staff support to the Funders' Work Group and each of the subcommittees, synthesize project level profile data that span across the subcommittees, reconcile the list of jointly funded projects on a periodic basis, compile information and evaluate the results of the Pilot Project.

Role	Tasks	Hours	Hourly Rate	Estimated Budget
Project Management	Develop work plan	5	95	\$475
	Select projects	10	95	\$950
	Develop monitoring schedule	10	95	\$950
	Refine data collection methods	20	95	\$1,900
	Set project outcomes and design project evaluation tool	25	95	\$2,375
	Monitor budget, staffing, contracts and work plan	24	95	\$2,280
Subtotal:				\$8,930
Staffing of Committees: Funders' Work Group; PP Advisory Committee, Tech Subcommittee	Set agenda, work plans, facilitate meetings, prepare minutes, follow up research in between meetings	250	95	\$23,750
Implementation of Pilot Project:				
Financial management implementation:		75	95	\$7,125
Physical inspections implementation:		75	95	\$7,125
Tenant data and file review implementation:		75	95	\$7,125
Technology implementation:		100	110	\$11,000
Subtotal:				\$32,375
Testing and Evaluation	Monitoring visits completed	40	95	\$3,800
	Feedback sought from participants in Pilot Project	25	95	\$2,375
	Scheduled monthly reports to the Funders' Work Group	36	95	\$3,420
	Identify improvements/adjustments needed for Coordinated Compliance Project in order to "go live"	50	95	\$4,750
Subtotal:				\$14,345
TOTAL BUDGET:				\$79,400

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Phase II Schedule:											
<i>Streamlining Compliance Project Phase II - Schedule Overview</i>											
<i>Key Milestones</i>	<i>Dec</i>	<i>Jan</i>	<i>Feb</i>	<i>March</i>	<i>April</i>	<i>May</i>	<i>June</i>	<i>July</i>	<i>Aug to Oct</i>	<i>Nov to Dec</i>	<i>Jan 2011</i>
Funders' Work Group adopts report											
Funders' Work Group adopts budget											
Pilot Project Begins											
Monitoring continues on projects in Pilot											
Pilot Project Ends											
Results of Pilot Project evaluated											
Final Design Adopted and MOUs updated											
Full implementation begins											

Pilot Project Evaluation and Transition to Implementation:

In the fall of 2010 the Funders' Work Group will review the results of the Pilot Project, and provide guidance on the final design of the Coordinated Compliance Program. The Technology Subcommittee will continue to provide valuable feedback and recommendations on coordinated technology improvements needed to support implementation. The Funders' Work Group will develop proposals for financing the implementation and maintenance of the Coordinated Compliance Program. Participating lenders will review and approve a final design and implementation plan for launch in January 2011.

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APPENDIX 1:

COMMON FINANCIAL REPORTING DATA ELEMENTS – PART ONE

Income and Expenses for Year Ending December 31, 200x

Project Name :

Project ID #:

Prepared by:

Email:

Use the Tab key to move from cell to cell.

INCOME

Gross Potential Income from tenant rent or contribution	
Gross Potential Rent from Rent Subsidy	
Gross Potential Residential Rental Income	\$0
Gross Commercial Income	
Total Gross Income	\$0
Residential Vacancy	
Concessions	
Commercial Vacancy	
Effective Rental Income	\$0
Laundry	
Parking	
Miscellaneous fees	
Other Income	
Service Income	
EGI: Effective Gross Income	\$0

EXPENSES

On Site management	
On Site management associated with Manager's unit or other administrative unit	
Off Site Management	
Professional Services: Legal/Audit/Accounting	
Office Administration	
Advertising and Marketing	
Bad Debt (Residential)	
Security	
Repairs and Maintenance performed under contract	
Repairs and Maintenance performed by agency staff	
Turnover performed under contract	
Turnover performed by agency staff	
Elevator	
Landscaping	
Electric and Natural Gas	
Water and Sewer	
Garbage Removal	
Other Utilities	
Real Estate Tax	
Insurance	

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Fees			
Asset Management Fees			
Resident Services			
Replacement Reserves			
Commercial Expense			
Other			
Total Expenses			\$0
Debt Service Payments			
<u>Must Pay Debt and Loan Priority</u>		<u>Payment</u>	<u>Lender</u>
First Position Loan Principal			-
First Position Loan Interest			-
Subordinate Loan Principal			-
Subordinate Loan Interest			-
Other Hard Debt Principal			-
Other Hard Debt Interest			-
Total Must Pay Debt		0	
Net Cash Flow			
Priority Payment 1			
Priority Payment 2			
Priority Payment 3			
Priority Payment 4			
Priority Payment 5			
Priority Payment 6			
Priority Payment 7			
Cash Flow (NOI - Debt Service)			\$0

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APPENDIX 2:

FINANCIAL REPORTING DATA ELEMENTS – RESERVE WORKSHEET

Reserve Worksheet

Project Name: **Project ID:**

12-month period ending:

Replacement Reserve Deposits and Withdrawals

<i>Date</i>	<i>Explanation of Withdrawal</i>	<i>Withdrawal</i>	<i>Deposit</i>	<i>Reserve Balance</i>
				\$ -
				#VALUE!
				#VALUE!
				#VALUE!
				#VALUE!
	<i>required annual deposit</i>			#VALUE!
	<i>interest earned</i>			#VALUE!
Ending Balance:				<input style="width: 100px; height: 30px;" type="text"/>

Operating Reserve Deposits and Withdrawals

<i>Date</i>	<i>Explanation of Withdrawal</i>	<i>Withdrawal</i>	<i>Deposit</i>	<i>Reserve Balance</i>
				\$ -
				#VALUE!
				#VALUE!
				#VALUE!
				#VALUE!
	<i>required annual deposit</i>			#VALUE!
	<i>interest earned</i>			#VALUE!
Ending Balance:				\$ -

** Ending balances must match with bank statement.*

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APPENDIX 3

Proposed Consolidated Tenant and Unit Data Reporting Format

Bldg ID Number (BIN)	Unit #	Type of HOME	# of Bedrooms	Resident Name	House hold Size at move in	Move-In Date	Move-Out Date	Unit Transfer? (If yes, list unit # from)	Most restricted income limit at move in
A	B	C	D	E	F	G	H	I	J
#	#	High	Studio	Last	#	Date	Date	Unit #	\$
		Low	SRO	First Initial					
		Floating	1	Manager					
		Fixed	2	Vacant					
		N/A	3	Market Rate Unit					
			4						
			5						
			5+						

Gross Annual House hold Income at Move-in	Gross Annual House hold Income at First-Yr Cert.	Current House hold Size	Effective Date of Current Certification	Current Gross Annual House hold Income	Most Restrictive Rent (utilities included) (A)	Current Utility Allowance (enter \$0 if owner-paid) (B)	Current Maximum Tenant Rent Allowed (A) - (B)	Actual Monthly Rent Charged	Current Monthly Tenant Portion
K	L	M	N	O	P	Q	R	S	T
\$	\$	#	Date	\$	\$	\$	\$	\$	\$

Streamlining Compliance in Oregon's Affordable Housing

APPENDIX 3 - Proposed Consolidated Tenant and Unit Data Reporting Format -									
Current Monthly Rent Subsidy	Rent Subsidy Type	#Female Head of House hold	# Male Head of House hold	# of Adults	# of Children	Disabled House hold?	Senior (Age 62+)	Race	Ethnicity
U	V	X	Y	Z	AA	BB	CC	DD	EE
\$	TB Sec 8	#	#	#	#	Y/N	#	American Indian/Alaska Native	Hispanic
	PB Sec 8							Black/Af. American	Non-Hispanic
	Other							Asian	
								Native Haw/ Other Pac Islander	
								White	
								Am. Alaska & White	
								Asian and White	
								Black-Af. Am & White	
								Am. Indian/ Al. Native & Black/Af. American	

Streamlining Compliance in Oregon's Affordable Housing

APPENDIX 4

OREGON CONSOLIDATED COMPLIANCE PROGRAM – PHYSICAL INSPECTION

Oregon Coordinated Compliance Program – Physical Inspections

Property Name:	ID #:
Inspection Date:	CO:

AREA No. 1: SITE				
Inspectable Item	Observable Deficiency	Minor	Major	Exigent
Fencing and Gates	Damaged/Falling/Leaning			
	Holes			
	Missing Sections			
Grounds	Erosion/Rutting Areas			
	Overgrown/Penetrating Vegetation			
	Ponding/Site Drainage			
Health & Safety	Air Quality - Sewer Odor Detected			
	Air Quality - Propane/Natural Gas/Methane Gas Detected			
	Electrical Hazards - Exposed Wires/Open Panels			
	Electrical Hazards - Water Leaks on/near Electrical Equipment			
	Flammable Materials - Improperly Stored			
	Garbage and Debris - Outdoors			
	Hazards - Other			
	Hazards - Sharp Edges			
	Hazards - Tripping			
	Infestation - Insects			
	Infestation - Rats/Mice/Vermin			
Mailboxes/Project Signs	Mailbox Missing/Damaged			
	Signs Damaged			
Market Appeal	Graffiti			
	Litter			
Parking Lots/Driveways/Roads	Cracks			
	Ponding			
	Potholes/Loose Material			
	Settlement/Heaving			
Play Areas and Equipment	Damaged/Broken Equipment			
	Deteriorated Play Area Surface			
Refuse Disposal	Broken/Damaged Enclosure-Inadequate Outside Storage Space			
Retaining Walls	Damaged/Falling/Leaning			
Storm Drainage	Damaged/Obstructed			
Walkways/Steps	Broken/Missing Hand Railing			
	Cracks/Settlement/Heaving			
	Spalling			
Summary Comments:				
Note pictures taken of deficiencies				

Streamlining Compliance in Oregon's Affordable Housing

Oregon Coordinated Compliance Program – Physical Inspections

AREA NO. 2 – BUILDING EXTERIOR				
Inspectable Item	Observable Deficiency	Minor	Major	Exigent
Doors	Damaged Frames/Threshold/Lintels/Trim			
	Damaged Hardware/Locks			
	Damaged Surface (Holes/Paint/Rusting/Glass)			
	Damaged/Missing Screen/Storm/Security Door			
	Deteriorated/Missing Caulking/Seals			
	Missing Door			
Fire Escapes	Blocked Egress/Ladders			
	Visibly Missing Components			
Foundations	Cracks/Gaps			
	Spalling/Exposed Rebar			
Health and Safety	Electrical Hazards - Exposed Wires/Open Panels			
	Electrical Hazards - Water Leaks on/near Electrical Equipment			
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable			
	Emergency Fire Exits - Missing Exit Signs			
	Flammable/Combustible Materials - Improperly Stored			
	Garbage and Debris - Outdoors			
	Hazards - Other			
	Hazards - Sharp Edges			
	Hazards - Tripping			
	Infestation - Insects			
	Infestation - Rats/Mice/Vermin			
Lighting	Broken Fixtures/Bulbs			
Roofs	Damaged Soffits/Fascia			
	Damaged Vents			
	Damaged/Clogged Drains			
	Damaged/Torn Membrane/Missing Ballast			
	Missing/Damaged Components from Downspout/Gutter			
	Missing/Damaged Shingles			
	Ponding			
Walls	Cracks/Gaps			
	Damaged Chimneys			
	Missing/Damaged Caulking/Mortar			
	Missing Pieces/Holes/Spalling			
	Stained/Peeling/Needs Paint			
Windows	Broken/Missing/Cracked Panes			
	Damaged Sills/Frames/Lintels/Trim			
	Damaged/Missing Screens			
	Missing/Deteriorated Caulking/Seals/Glazing Compound			
	Peeling/Needs Paint			
	Security Bars Prevent Egress			
Summary Comments:				
Note pictures taken of deficiencies				

Streamlining Compliance in Oregon's Affordable Housing

Oregon Coordinated Compliance Program – Physical Inspections

AREA NO. 3: BUILDING SYSTEMS				
Inspectable Item	Observable Deficiency	Minor	Major	Exigent
Domestic Water	Leaking Central Water Supply			
	Misaligned Chimney/Ventilation System			
	Missing Pressure Relief Valve			
	Rust/Corrosion on Heater Chimney			
	Water Supply Inoperable			
Electrical System	Blocked Access/Improper Storage			
	Burnt Breakers			
	Evidence of Leaks/Corrosion			
	Frayed Wiring			
	Missing Breakers/Fuses			
Elevators	Missing Covers			
	Not Operable			
Emergency Power	Auxiliary Lighting Inoperable			
	Run-Up Records/Documentation Not Available			
Fire Protection	Missing Sprinkler Head			
	Missing/Damaged/Expired Extinguishers			
Health & Safety	Air Quality - Mold and/or Mildew Observed			
	Air Quality - Propane/Natural Gas/Methane Gas Detected			
	Air Quality - Sewer Odor Detected			
	Electrical Hazards - Exposed Wires/Open Panels			
	Electrical Hazards - Water Leaks on/near Electrical Equipment			
	Elevator - Tripping			
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable			
	Emergency Fire Exits - Missing Exit Signs			
	Flammable Materials - Improperly Stored			
	Garbage and Debris - Indoors			
	Hazards - Other			
	Hazards - Sharp Edges			
	Hazards - Tripping			
	Infestation - Insects			
	Infestation - Rats/Mice/Vermin			
HVAC	Boiler/Pump Leaks			
	Fuel Supply Leaks			
	General Rust/Corrosion			
	Misaligned Chimney/Ventilation System			
Roof Exhaust System	Roof Exhaust Fan(s) Inoperable			
Sanitary System	Broken/Leaking/Clogged Pipes or Drains			
	Missing Drain/Cleanout/Manhole Covers			
Summary Comments:				
Note pictures taken:				

Streamlining Compliance in Oregon's Affordable Housing

Oregon Coordinated Compliance Program – Physical Inspections

AREA NO. 4: COMMON AREAS				
Inspectable Item Location	Observable Deficiency	Minor	Major	Exigent
Basement/Garage/Carport	Baluster/Side Railings - Damaged			
Closet/Utility/Mechanical	Cabinets - Missing/Damaged			
Community Room	Call for Aid - Inoperable			
Day Care	Ceiling - Bulging/Buckling			
Halls/Corridors/Stairs	Ceiling - Holes/Missing Tiles/Panels/Cracks			
Kitchen	Ceiling - Peeling/Needs Paint			
Laundry Room	Ceiling - Water Stains/Water Damage/Mold/Mildew			
Lobby	Countertops - Missing/Damaged			
Office	Dishwasher/Garbage Disposal - Inoperable			
Other Community Spaces	Doors - Damaged Frames/Threshold/Lintels/Trim			
Patio/Porch/Balcony	Doors - Damaged Hardware/Locks			
Restrooms/Pool Structures	Doors - Damaged Surface (Holes/Paint/Rust/Glass)			
Storage	Doors - Damaged/Missing Screen/Storm/Security Door			
	Doors - Deteriorated/Missing Seals (Entry Only)			
	Doors - Missing Door			
	Dryer Vent -Missing/Damaged/Inoperable			
	Electrical - Blocked Access to Electrical Panel			
	Electrical - Burnt Breakers			
	Electrical - Evidence of Leaks/Corrosion			
	Electrical - Frayed Wiring			
	Electrical - Missing Breakers			
	Electrical - Missing Covers			
	Floors - Bulging/Buckling			
	Floors - Floor Covering Damaged			
	Floors - Missing Floor/Tiles			
	Floors - Peeling/Needs Paint			
	Floors - Rot/Deteriorated Subfloor			
	Floors - Water Stains/Water Damage/Mold/Mildew			
	GFI - Inoperable			
	Graffiti			
	HVAC - Convection/Radiant Heat System Covers Missing/Damaged			
	HVAC - General Rust/Corrosion			
	HVAC - Inoperable			
	HVAC - Misaligned Chimney/Ventilation System			
	HVAC - Noisy/Vibrating/Leaking			
	Lavatory Sink - Damaged/Missing			
	Lighting - Missing/Damaged/Inoperable Fixture			
	Mailbox - Missing/Damaged			
	Outlets/Switches/Cover Plates - Missing/Broken			
	Pedestrian/Wheelchair Ramp			
	Plumbing - Clogged Drains			
	Plumbing - Leaking Faucet/Pipes			
	Range Hood /Exhaust Fans - Excessive Grease/Inoperable			
	Range/Stove - Missing/Damaged/Inoperable			
	Refrigerator - Damaged/Inoperable			
	Restroom Cabinet - Damaged/Missing			

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Oregon Coordinated Compliance Program – Physical Inspections

	Shower/Tub - Damaged/Missing			
	Sink - Missing/Damaged			
	Smoke Detector - Missing/Inoperable			
	Stairs - Broken/Damaged/Missing Steps			
	Stairs - Broken/Missing Hand Railing			
	Ventilation/Exhaust System - Inoperable			
	Walls - Bulging/Buckling			
	Walls - Damaged			
	Walls - Damaged/Deteriorated Trim			
	Walls - Peeling/Needs Paint			
	Walls - Water Stains/Water Damage/Mold/Mildew			
	Water Closet/Toilet - Damaged/Clogged/Missing			
	Windows - Cracked/Broken/Missing Panes			
	Windows - Damaged Window Sill			
	Windows - Inoperable/Not Lockable			
	Windows - Missing/Deteriorated Caulking/Seals/Glazing Compound			
	Windows - Peeling/Needs Paint			
	Windows - Security Bars Prevent Egress			
Health & Safety	Air Quality - Mold and/or Mildew Observed			
	Air Quality - Propane/Natural Gas/Methane Gas Detected			
	Air Quality - Sewer Odor Detected			
	Electrical Hazards - Exposed Wires/Open Panels			
	Electrical Hazards - Water Leaks on/near Electrical Equipment			
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable			
	Emergency Fire Exits - Missing Exit Signs			
	Flammable/Combustible Materials - Improperly Stored			
	Garbage and Debris - Indoors			
	Garbage and Debris - Outdoors			
	Hazards - Other			
	Hazards - Sharp Edges			
	Hazards - Tripping			
	Infestation - Insects			
Infestation - Rats/Mice/Vermin				
Pools and Related Structures	Fencing - Damaged/Not Intact			
	Pool - Not Operational			
Trash Collection Areas	Chutes - Damaged/Missing Components			

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Oregon Coordinated Compliance Program – Physical Inspections

Project ID/Name:		Inspection Date:		
Building/Unit No:				
Inspectable Item	Observable Deficiency	Minor	Major	Exigent
Bathroom	Bathroom Cabinets - Damaged/Missing			
	Lavatory Sink - Damaged/Missing			
	Plumbing - Clogged Drains			
	Plumbing - Leaking Faucet/Pipes			
	Shower/Tub - Damaged/Missing			
	Ventilation/Exhaust System - Inoperable			
	Water Closet/Toilet - Damaged/Clogged/Missing			
Call-for-Aid	Inoperable			
Ceiling	Bulging/Buckling			
	Holes/Missing Tiles/Panels/Cracks			
	Peeling/Needs Paint			
	Water Stains/Water Damage/Mold/Mildew			
Doors	Damaged Frames/Threshold/Lintels/Trim			
	Damaged Hardware/Locks			
	Damaged/Missing Screen/Storm/Security Door			
	Damaged Surface - Holes/Paint/Rusting/Glass			
	Deteriorated/Missing Seals (Entry Only)			
	Missing Door			
Electrical System	Blocked Access to Electrical Panel			
	Burnt Breakers			
	Evidence of Leaks/Corrosion			
	Frayed Wiring			
	GFI - Inoperable			
	Missing Breakers/Fuses			
	Missing Covers			
Floors	Bulging/Buckling			
	Floor Covering Damage			
	Missing Flooring Tiles			
	Peeling/Needs Paint			
	Rot/Deteriorated Subfloor			
Health & Safety	Water Stains/Water Damage/Mold/Mildew			
	Air Quality - Mold and/or Mildew Observed			
	Air Quality - Sewer Odor Detected			
	Air Quality - Propane/Natural Gas/Methane Gas Detected			
	Electrical Hazards - Exposed Wires/Open Panels			
	Electrical Hazards - Water Leaks on/near Electrical Equipment			
	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable			
	Emergency Fire Exits - Missing Exit Signs			
	Flammable Materials - Improperly Stored			
	Garbage and Debris - Indoors			
	Garbage and Debris - Outdoors			
	Hazards - Other			

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Oregon Coordinated Compliance Program – Physical Inspections

	Hazards - Sharp Edges			
	Hazards - Tripping			
	Infestation - Insects			
	Infestation - Rats/Mice/Vermin			
Hot Water Heater	Misaligned Chimney/Ventilation System			
	Inoperable Unit/Components			
	Leaking Valves/Tanks/Pipes			
	Pressure Relief Valve Missing			
	Rust/Corrosion			
HVAC System	Convection/Radiant Heat System Covers Missing/Damaged			
	Inoperable			
	Misaligned Chimney/Ventilation System			
	Noisy/Vibrating/Leaking			
	Rust/Corrosion			
Kitchen	Cabinets - Missing/Damaged			
	Countertops - Missing/Damaged			
	Dishwasher/Garbage Disposal - Inoperable			
	Plumbing - Clogged Drains			
	Plumbing - Leaking Faucet/Pipes			
	Range Hood/Exhaust Fans - Excessive Grease/Inoperable			
	Range/Stove - Missing/Damaged/Inoperable			
	Refrigerator-Missing/Damaged/Inoperable			
	Sink - Damaged/Missing			
Laundry Area (Room)	Dryer Vent - Missing/Damaged/Inoperable			
Lighting	Missing/Inoperable Fixture			
Outlets/Switches	Missing			
	Missing/Broken Cover Plates			
Patio/Porch/Balcony	Baluster/Side Railings Damaged			
Smoke Detector	Missing/Inoperable			
Stairs	Broken/Damaged/Missing Steps			
	Broken/Missing Hand Railing			
Walls	Bulging/Buckling			
	Damaged			
	Damaged/Deteriorated Trim			
	Peeling/Needs Paint			
	Water Stains/Water Damage/Mold/Mildew			
Windows	Cracked/Broken/Missing Panes			
	Damaged Window Sill			
	Missing/Deteriorated Caulking/Seals/Glazing Compound			
	Inoperable/Not Lockable			
	Peeling/Needs Paint			
	Security Bars Prevent Egress			
Summary Comments:				

APPENDIX 5 –

MEMORANDUM OF UNDERSTANDING FOR THE DEVELOPMENT AND TESTING OF A COORDINATED COMPLIANCE PROGRAM FOR AFFORDABLE HOUSING PROJECTS IN OREGON

The undersigned entities (“Participating Agencies”) have entered into this Memorandum of Understanding (“MOU”) to facilitate the compliance of housing projects participating in the Oregon tax-exempt and taxable bond programs, Low-Income Housing Tax Credit program and other housing finance programs offered through the Oregon Department of Housing and Community Services (“OHCS”), local city and county governments (“HOME participating jurisdictions”), and the Network for Oregon Affordable Housing (“NOAH”), to improve the administration of the programs and to provide better customer service to owners and residents living in affordable housing developments assisted by all of these public and nonprofit entities.

RECITALS:

- A. More than 85% of affordable rental housing developments in Oregon receive capital subsidies from more than one of the Participating Agencies in this MOU. There are substantial similarities in the compliance monitoring and oversight requirements administered by each of the Participating Agencies with respect to their jointly funded projects. All Participating Agencies desire to achieve efficiencies in their respective staffing required for compliance. All Participating Agencies also desire to eliminate or reduce potentially burdensome requirements for project owners.
- B. The Participating Agencies have engaged in a planning process called the **Streamlining Compliance Project**, through which representatives of the Participating Agencies have reviewed the compliance components of each housing finance program and identified the common elements. Representatives of the Participating Agencies and of the owners and managers of affordable housing projects have participated in this planning process.
- C. The results of this planning process have demonstrated that there are over 500 existing housing projects that are jointly funded by the Participating Agencies. Based on some sampling as well as review of the coordinated compliance program in the State of Washington, the participating agencies have determined that there are potentially significant savings to be gained by jointly carrying out their respective compliance monitoring functions.

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- D. Owners of the affordable rental housing developments financed by the Participating Agencies are responsible for ensuring that they comply with the regulations of each of the financing programs. Each of the Participating Agencies monitors program compliance and initiates enforcement action with respect to instances of non-compliance. There is significant overlap in regulations for each of the financing programs. The Participating Agencies have identified these similarities and have proposed modifications to these reporting and monitoring practices to achieve common reporting formats across agencies and programs.
- E. The Participating Agencies wish to develop and test methods for how to implement a coordinated reporting and monitoring system that would meet the regulatory requirements of the multiple housing financing programs they administer, while reducing costs for both Participating Agencies and the owners of the affordable rental housing and reducing intrusions into the lives and personal information of the residents of this housing.

TERM:

The Participating Agencies participating in this MOU will review the provisions of this MOU on an annual basis (September 30) to determine whether, and how best, to continue to work together to achieve efficiencies through coordinated action.

PROVISIONS:

- 1) The Participating Agencies agree to move forward with implementing a Coordinated Compliance Program (CCP) based on the recommendations from the Streamlining Compliance Project planning process, including:
 - a. Adopting a single common, standardized financial report format, and affirming that the common report format will provide them with the needed information to complete their compliance and oversight activities;
 - b. Coordinating physical inspections, either by scheduling jointly to avoid repeat inspections (minimum level of coordination) or by agreeing to share results of inspection findings among lenders and thereby, eliminating duplicate inspections (maximum level of coordination);
 - c. Adopting a single common report format for collection of tenant data, and coordinating the frequency of reporting to the greatest degree possible;

Streamlining Compliance in Oregon's Affordable Housing

- d. Exploring the use of electronic file transmittal in advance of site visits to either conduct income certifications or other compliance monitoring at a home office (maximum level of efficiency) or to reduce the amount of time selecting files/units during each site visit (minimum level of efficiency).
- 2) In order to coordinate the full development of the Coordinated Compliance Program, each participating agency agrees to appoint a representative to serve on a CCP Funders' Work Group (FWG), which is then responsible for carrying out the intent of this MOU:
- a. The Funders' Work Group will develop rules of operation which will include, but not be limited to, the process for selecting a chair, the duties of the chair, schedule and location of meetings.
 - b. The representatives of each Participating Agency on the Funders' Work Group can appoint other members of their organization to serve on subcommittees to address specific compliance functions, such as Inspections, Financial Reporting, Technology, etc. When appointing a subcommittee, the Funders' Work Group will develop a charge and scope of work for the subcommittee.
 - c. The Funders' Work Group and its subcommittees will develop common procedures and forms, and work with owners and managers of their jointly funded housing projects to implement procedures and reporting protocols. To the extent feasible, the Participating Agencies will work toward a single, electronic reporting mechanism to be used by all participants.
 - d. The Funders' Work Group will develop proposals for financing the implementation and maintenance of the Coordinated Compliance Program.
 - e. The Funders' Work Group will prepare an annual report for all of the Participating Agencies identifying the actions of the previous year and their accomplishments in streamlining compliance.
- 3) To test the proposed Coordinated Compliance Program, the Participating Agencies agree to initiate a **Pilot Project** to evaluate the best approaches for coordination, to refine the common reporting forms, to develop protocols to address how and when to share confidential information, and to test methods transferring shared data. A description of the Pilot Project is attached to this MOU as Exhibit A. The Funders' Work Group will oversee the design and implementation of the Pilot Project and will

Streamlining Compliance in Oregon's Affordable Housing

utilize an Advisory Committee to assist with the design, implementation and evaluation of the Pilot Project.

- 4) Based on the evaluation of the Pilot Project, the Participating Agencies would proceed with full implementation of the Coordinated Compliance Program with a planned launch date of January, 2011.
- 5) This MOU does not replace, supersede or suspend any obligations that owners of affordable housing projects financed by the Participating Agencies under existing regulatory documents.
- 6) It is understood that this MOU does not alter the legal obligations of the Participating Agencies with respect to projects that receive financing, but rather documents the parties' intention to cooperate in achieving efficiencies in meeting their respective obligations. It is also understood that this Memorandum of Understanding is nonbinding.

Agreed By:

**Oregon Department of Housing &
Community Services Department**

By _____

Date _____

**Network for Oregon Affordable
Housing**

By _____

Date _____

Portland Housing Bureau

By _____

Date _____

Washington County

By _____

Date _____

Clackamas County

By _____

Date _____

City of Eugene

By _____

Date _____

Streamlining Compliance in Oregon's Affordable Housing

Housing Authority of Portland

By _____

Date _____

City of Salem

By _____

Date _____

City of Corvallis

By _____

Date _____

Portland Development Commission

Date _____

City of Gresham

By _____

Date _____

City of Beaverton

Date _____

Streamlining Compliance in Oregon Affordable Housing

APPENDIX 6

STREAMLINING COMPLIANCE PROJECT COMMITTEES

FUNDERS' WORK GROUP MEMBERS:

Robin Boyce, Housing Development Center (HDC)
Doug Carlson, HUD, Portland Area Office
Elaine Fultz, City of Gresham
Stephanie Jennings, City of Eugene
Gloria Lewton, Clackamas County
Louise Lauman, Portland Development Commission
Daniel Ledezma & Maggie Jonsson, Portland Housing Bureau
Marlys McNeill, Oregon Housing & Community Services (OHCS)
Rena Peck, City of Salem
Jill Riddle, Housing Authority of Portland (HAP)
Ben Sturtz, Washington County
Nancy Thomas, Network for Oregon Affordable Housing (NOAH)

FINANCIAL REPORTING SUBCOMMITTEE:

Dave Bachman, Cascade Management
Robin Boyce, HDC
Joan Cook, REACH CDC
Joni Hartmann, NOAH
Chris Hughson, Portland Development Commission (PDC)
Maggie Jonsson, Portland Housing Bureau
John Skelton, OHCS
Steve Weber, Access Inc.

TENANT DATA AND FILE REVIEW

SUBCOMMITTEE:

Jonathan Baker, Marion County Housing Authority
Maggie Campbell, Income Property Management
Tonya Evans, OHCS
Amanda Gross, Guardian Property Management
Louise Lauman, PDC
Gloria Lewton, Clackamas County
Toni Payseno, City of Salem

INSPECTIONS SUBCOMMITTEE:

Brian Bieler, REACH CDC
Jacob Fox, HAP
Leslie Johnstone, Princeton Property Management
Heather Pate, OHCS
Kathy Rock, Clackamas County
Ben Sturtz, Washington County
Nancy Thomas, NOAH

TECHNOLOGY SUBCOMMITTEE:

John Atten, Central City Concern
Bob Carleski, for NOAH
Marcus Furr, PDC
Doug Glancy, REACH CDC
Shawn Michael, TACS
Ken Pickett, OHCS
Antoinette Pietka, Portland Housing Bureau
Julie Satterwhite, HAP
Julius Yu, HAP

Staff and Project Consultants:

Molly Rogers, Housing Development Center
Margaret M Mahoney, TACS, consultant
M.A. Leonard, TACS, sub-consultant