

Chapter 5. REMOTE MONITORING

Section 5. REMOTE MONITORING

5-1General. As addressed in Chapter 4 of the Field Office Monitoring of Public Housing Agencies Handbook 7460.7, as amended, remote monitoring is the primary method by which PHAs will be monitored the majority of the time. The remote monitoring of OMP serves several functions; i.e., it assists in identifying the PHA's OMP proficiency/level of performance; identifies potential problems; provides the opportunity to correct PHA errors and problems before they worsen; identifies OMP performance initiatives and effective practices by PHAs that can be used to assist other PHAs; and provides information on the OMP functional area (problems, concerns, negative trends) to assist the Area Office in determining which PHAs will be reviewed on site. Chapter 4, Remote Monitoring, of Handbook 7460.7, as amended, should be carefully read to fully appreciate the role that remote monitoring is to play in HUD's oversight of the Public Housing Program. Particularly important is the emphasis on the need for remote monitoring follow-up (Chapter 4). Whether by telephone, written communication or request for the PHA to visit the Area Office, follow-up on identified or suspected OH problem areas is vitally important. The Area Office's follow-up activities should be documented in the PHA files. The Area Office may find it valuable to maintain a follow-up log, by PHA, to ensure it is following up when the PHA has not responded to requests for information, documentation, etc., as well as to ensure timely, reciprocal responses by Area Offices to PHAs.

A.Information Sources. Information available in the office, or obtainable from outside sources for remote monitoring should be examined. The information includes, but is not limited to, the following:

- 1.PHA Policies and Procedures: Examine for quality, up to date;
2. PHMAP: Quality of submission, performance;
- 3.Improvement Plan/MOA and subsequent performance reports: quality of strategy, data integrity, management tracking of performance, goal setting process, accountability, actual accomplishments;

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4.Union Agreements: Reflect quality of negotiations, look for overly restrictive provisions;

5.Reports provided to Board and PHA Executives: Reflects on Board evaluation process, organizational accountability;

6.Resident communications: Written and verbal communication can give insights to OMP function;

7. Newspaper articles: Media/public relations, local government relationship;

8. Organization Chart: Structure, lines of communication and authority;

9. CGP Five Year Plan: Quality of planning, allocation of resources, administrative capability, local government participation;

10. IPA Audit: May reflect on any and all OMP functions, particularly as indicated by repeat nature of findings;

11. Past HUD reviews;

12. Consultant reports;

13. Position Descriptions: Obtain from PHA for use in determining quality of personnel administration. Determine if position descriptions are current, performance oriented, and accurately reflect duties performed;

14. PHA Annual Reports: Public relations quality, summation of PHA mission, ties to community;

15. PHA Reports: TAR, Occupancy etc. and sample reports generated for PHA use, as evidence of accuracy and timeliness of PHA management information systems; and

16. Consultation with OGC (Area Office) on litigation and PHA management of legal function.

Based upon a preliminary review of these and other available sources, additional sources of information should be targeted

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in areas where problems are suspected. This may involve obtaining further written material from the PHA, phone interviews with PHA staff, Board, local government officials etc. On-site time should be reserved for those information needs that cannot be satisfied on a remote basis. Because of the nature of OMP and the wide-ranging nature of its linkages to other functions, close coordination with other review team members is critical during remote monitoring, in-office preparation for an on-site review, and during an on-site review.

B. Use of Remote Monitoring and Problem Analysis Worksheets. The Remote Monitoring Worksheets and Problem Analysis Worksheets (Appendices 2 and 4, respectively) are tools to use in reviewing PHA performance, identifying problems, related causes, and strategies to resolve the problems from the Area Office. These strategies are shared with the PHA as potential remedial actions. Use of these worksheets is not mandatory, but it is encouraged because they present a comprehensive approach to remote monitoring

resources (forms, reports, policies, etc.) in the OMP functional area (Note: the MIS sub-function within OMP does not have Remote Monitoring Worksheets, as explained in paragraph 1-3 H. 3.b. These worksheets facilitate understanding individual situations using in-office monitoring resources. In-office monitoring resources can alert the area office to potential problems. An explanation of the use of the Remote Monitoring Worksheets and the Problem Analysis Worksheets is as follows:

1. The Remote Monitoring Worksheets for the OMP functional area are divided into the following categories:

a. Remote Monitoring Resources. The OMP functional area has a series of remote monitoring resources (forms, reports, policies submitted by a PHA, or information otherwise available through HUD, OIG reviews, etc.) that can be used to assess PHA operations within the OMP functional area. Any other remote monitoring resources that an Area Office has identified may also be used in remote monitoring.

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b. References. Each remote monitoring resource has one or more references listed; e.g., a Federal regulation, HUD Handbook, notice, or other reference containing information on HUD requirements and the guidance HUD has provided relative to the remote monitoring resource being evaluated. Reviewers should be thoroughly familiar with the references in order to ascertain HUD's requirements for PHA performance.

c. Information Sources. Information sources (HUD forms, review or audit reports, PHA policy documents, correspondence, SMIRPH, grant agreement documents, ROBOTS, contract documents, etc.) are indicated for each remote monitoring resource. The information sources indicate what/where to look for information on the monitoring resource. There may be both primary and secondary information sources listed. The primary sources are those that should first be checked, with the secondary sources also providing useful information.

d. Review Actions/Questions. Each worksheet listing a remote monitoring resource includes a series of review actions and questions. These are directly related to the information provided by the forms, documents, etc. in the information sources category. The suggested actions and questions assist the user in determining the outcome/answers to the review actions/questions, and consequently whether or not a problem exists.

e. Relationship to sub-functions and components. This category of information identifies subfunctions and components within the OMP functional area related to

review actions/questions. It assists the use in linking areas of operation within the OMP function that are related to a specific problem. Further analysis and inquiry into related sub-functions and components will reveal which of them have areas of deficiency contributing to the identified problem.

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f. Notes. Space provided on the worksheets for notes is to record the answers to questions/results of review actions, as well as to note any observations or questions that seem relevant. The reviewer can divide the results into three (3) categories: problems, areas of uncertainty, and areas of positive performance. At this point, Area Office staff may need to obtain additional information to further refine the list of apparent problem areas. The next step is to use the Problem Analysis Worksheets.

2. The Problem Analysis Worksheets are designed to help the reviewer determine the possible causes of problems and possible strategies to address them. Each worksheet is divided into the following categories:

a. Problem. The first step is to match the PHA's problem(s) with those listed in the Problem Analysis Worksheets that most closely match. If the problem found using the Remote Monitoring Worksheets (or the On-Site Review Worksheets, in the case of on-site reviews) does not match directly with one of those listed on the Problem Analysis Worksheets, it may be a sub-set of one of the problems listed in the possible causes column. Having matched the problem to one listed on the worksheet, the next step is to look at the corresponding possible causes column.

b. Possible Causes. This portion of the Problem Analysis Worksheet identifies the potential causes of problem(s). The reviewer reviews these causes to determine if there are any causes which clearly seem to be related to the problem.

c. Strategies. The category of information in the Problem Analysis Worksheets identifies the strategies that may be employed to address the identified cause(s) of a PHA's problem. The strategies listed for some functional areas are quite extensive, but the listings are not intended to be viewed as the only strategies that might be considered. Other avenues of approach should also be explored.

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d.Linkages with Other Functional Areas. This category of information identifies one or more of the other functional areas whose operations impact upon the problem area. The recognition of the interrelationships between a problem in one functional area and activities in another functional area(s) is essential to developing a multi-functional strategy to address a problem comprehensively.