

## Chapter 6. ON-SITE REVIEWS

## Section 6. ON-SITE REVIEWS

6-1General. Chapter 5 of the Field Office Monitoring of Public Housing Agencies Handbook 7460.7, as amended, addresses the requirements common to the on-site review of any one or more of the five (5) functional areas at a PHA. Chapter 5 covers key information pertinent to planning for an on-site review, developing a review schedule, conducting an on-site review (in-office preparations, arranging the on-site review, entry and exit meetings, and coordination among review team members), and preparation, issuance and distribution of the review's final report. This chapter contains valuable information and should be closely reviewed prior to conducting an on-site review of OMP. The information which follows in this paragraph highlights concerns of particular interest in performing an on-site review of any of the sub-functions/components within OMP.

A. Because assessing the OMP function is so reliant on obtaining information through interviews, it is crucial that the reviewer be as organized as possible in arranging the on-site discussions, particularly where ongoing access is limited, e.g., local government officials, Board members, the IPA auditor, etc. Through the use of the Remote Monitoring Worksheets, and prior review of the On-Site Worksheets, a list should be developed of those individuals that should be interviewed, along with key issues and questions to be discussed. (It may be possible through preliminary discussions by phone to narrow the focus for on-site discussions.) It is recommended that a wide array of PHA staff be interviewed, particularly front line supervisors and those coming in direct contact with residents, including development managers, maintenance workers, service providers, etc. Those delivering the product are particularly well placed to shed light on how the organization is impacting on their delivery of PHA services. In addition, an assessment of OMP would not be complete without interviews with the customer, the residents and their elected representatives. It is recommended that resident interviews and interviews with those PHA personnel on the front line (in the developments) take place early in the review. It may provide valuable information to use in subsequent interviews at higher levels within and outside the PHA.

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B. Employee Surveys. Valuable information about OMP (in all but small PHAs) can be derived from the use of anonymous employee surveys. Such surveys are being increasingly used within organizations to learn about how to improve operations, employee satisfaction, employee effectiveness, and meet other critical management objectives. One of the more prominent standardized surveys, the Index of Organizational Reactions, is attached as Appendix 7, for use in its entirety. Mean Scores, emanating from the results of over 40,000 individual surveys, are provided for each of the seven categories; i.e., supervision, kind of work, amount of work,

coworkers, physical work conditions, financial rewards, and career future. Also included in Appendix 7, are categorical questions on job satisfaction, hierarchy of authority, participation in decision making, and supervisory leadership. Portions of either the Employee Questionnaire or the Categorical Questions can be selected to tailor the survey to the particular area(s) of interest or concern. Use of either the Employee Questionnaire or the Categorical Questions shall adhere to the following:

1. Agreement must be sought from the PHA's executive director to use either the Employee Questionnaire or the Categorical Questions. Without such agreement, neither shall be used-- either in whole or in part. Agreement is an important prerequisite.

2. All PHA employees participating in the survey should be advised that it is being undertaken with the PHA's consent, and that the intent is to identify opportunities to improve PHA performance, not criticize the PHA or its employees. A feedback process should be considered to share survey results with employees.

3. Proper administration of the survey is important if the results are to be reliable. The survey should be administered through an anonymous questionnaire to either all employees, or a valid random sample of employees. A table of statistically

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valid sample sizes is provided as part of Appendix 7, to assist the reviewer in determining the appropriate number of employees to be surveyed.

4. Reviewers should bear in mind that while statistically valid results can be produced in terms of the number of employees surveyed, other factors must be taken into consideration when assessing survey results. For instance, a planned or recently executed reorganization of a PHA's internal functions may have resulted in feelings among employees of uncertainty and/or resistance to change. Likewise, a high level of local unemployment (job security being of preeminent importance), ongoing labor union negotiations/ disputes, and other circumstances can affect survey results. Reviewers should make certain they are knowledgeable of such circumstances in order to place survey results in the appropriate context.

C. Coordination with Other Review Team Members. A review of OMP requires intensive and ongoing input from the reviewers of the other functional areas, since the other functions are substantially derivative of the PHA's OMP performance. OMP issues manifest themselves in the other functional areas. Review Team members attempting to determine contributing causes to problems in their functional areas will be encountering the impact of OMP deficiencies; e.g., lack of training, organizational delays, lack of goals management, hiring problems, resource allocation issues,

the inability to improve or remove problem employees, inadequate supervision, etc. It is the role of the OMP reviewer to ensure that the manifestation of OMP problems are identified as such and that connections are made across functional areas when OMP problems are the common thread. The OMP reviewer should also alert the other reviewers to apparent OMP problems and issues arising from the OMP reviewer's research, so that the other reviewers can confirm if these issues are manifesting themselves in that reviewer's functional area. Interaction with the rest of the review team is therefore critical.

#### D. Use of On-Site Review and Problem Analysis Worksheets.

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1. The Remote Monitoring Worksheets and On-site Review Worksheets (Appendices 2 and 3, respectively) are used in combination to prepare for, and carry out on-site review. The use of the Remote Monitoring Worksheets helps to identify problem areas and areas of uncertainty that, after applying the risk analysis model, determine which problems will be concentrated on and the appropriate depth of analysis. (Note: The MIS sub-function has its own separate set of On-site Review and Problem Analysis Worksheets. See appendices 5 and 6. However, the guidance provided in this paragraph D is equally applicable to the MIS Worksheets.)

2. The On-site Review Worksheets help with both conducting on-site reviews and preparing for them. Using the On-site Review Worksheets is not mandatory, but is encouraged. Reviewers should feel free to supplement any category. An explanation of the use of the On-site Review Worksheets and their relationship to the Problem Analysis Worksheets, Appendix 4, is as follows:

The On-site Review Worksheets are divided into the following categories:

a. Sub-Functions and Components. The OMP functional area has a series of worksheets that divides it into its various parts: sub-functions and within sub-functions, by components. Based upon the results of remote monitoring, the reviewer locates the component(s) within the sub-function(s) identified as being related to the problem, or area of uncertainty. (see also the guidance below on the use of the information in the category entitled "Possible Problems. ")

b. References. Adjacent to the component category are references. These references list handbooks, notices, the ACC, sections of Federal regulations, or other documents that contain information on HUD requirements and the guidance HUD has provided regarding the component being evaluated.

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c.Information Sources. This is a guide to the source documents, files, policies, staff, etc., needed to carry through with review actions and questions necessary for evaluating the component that is the focus of concern. In some instances, information sources will be HUD file material, but usually will be primarily sources at the PHA, or within the community.

d.Review Actions. Review actions listed on worksheets are directly related to the information sources. They provide the reviewer with guidance on some of the appropriate on-site actions that should be taken using the information sources. For instance: interviewing PHA staff, reviewing certain PHA policies, reviewing specific types of PHA files, etc.

e.Review Questions. These questions follow from the review actions described above, and represent inquiries to which the reviewer needs answers. An important part of the review preparation process is for the reviewer to decide which review actions and related questions will be used. This assists to advise the PHA, before the review, about the particular staff members to be interviewed and policy documents that should be provided at the outset of the review, or made available during its course.

f.Notes. Space is provided on the On-site Review Worksheets for reviewers to record the names of individuals interviewed, answers provided to questions, results of file and policy document reviews. Anything the reviewer feels is important should be entered. Follow-up questions, listings of additional review actions to be pursued, and any other such pertinent thoughts and information may be entered.

g.Possible Problems. This category on the worksheet lists the problems that might result if a particular component within a sub-function is not operating efficiently and

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and effectively. Once remote monitoring has revealed the problem areas and areas of uncertainty, they can then be matched with the possible problems listed on the On-site Review Worksheets. This points to components and sub-functions that should be considered for on-site review. This process may suggest that components within the sub-functions of two or more functions require review to arrive at a comprehensive identification of sub-functional components in which corrective actions are needed to resolve the identified problem. The next step

is using the Problem Analysis Worksheets to arrive at appropriate strategies for corrective actions to be recommended to the PHA.

4. Problem Analysis Worksheets. See paragraph 5-B2 for information on the use of the Problem Analysis Worksheets during both remote monitoring and on-site review.