

CHAPTER 2 - TARGETING PHAs TO MONITOR

- 2-1. PHA JURISDICTION. The Field Office is required to maintain current data on characteristics of the public and assisted housing units managed by PHAs which vary greatly in location, physical characteristics, the types of services provided, and the overall condition. Public housing agencies are classified by size as follows:

Public Housing Agencies by Number of Units Administered

Large	=	1,250+
Medium	=	500 - 1,249
Small	=	100 - 499
Very Small	=	1 - 99

FHEO staff should contact the Management Information Officer or the Management Information Director in the Field Office Program Operating Division, Office of FHEO, to obtain a computer-generated listing (Total Number of Active PHAs in Management - F96-UAXA of Public Housing Agencies) in the jurisdiction where the review is to occur. The Field Office should be familiar with all types of housing in the PHA jurisdiction.

Additionally, the following jurisdictional data must be collected and reviewed before on-site monitoring:

- o all HUD-assisted housing located within a PHA's jurisdiction;
- o other Assisted Housing data for the PHA's jurisdiction;
- o population data;
- o race, ethnicity, gender and handicap data;
- o community-wide housing strategies;
- o income ranges;
- o labor market data, if any;
- o public and private fair housing organizations; and
- o Project Management Review Schedule--Management Operations Control Chart (MOCC Form HUD-52420).

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- 2-2. DEVELOPING THE ANNUAL PHA MONITORING PLAN. Monitoring of a PHA should be planned. The plan should be carefully coordinated to maximize the effectiveness of the monitoring review. To be effective, the plan should include a specific schedule which clearly outlines tasks and time frames. The plan should be coordinated at the

beginning of each fiscal year, since it is at this time that the Field Office FHEO Division and Regional Program Operations Division are responsible for selecting the PHAs which will be monitored for the year.

A. Planning Considerations in the Use of Resources.

Several factors should be considered when scheduling PHAs to monitor. These include:

1. the availability of travel funds for monitoring purposes;
2. whether travel will serve multiple purposes, such as conducting concurrent monitoring of PHAs with other program monitoring, e.g., Lower-Income Public Housing, Section 8 and Community Development Block Grant (CDBG);
3. the availability of staff and the overall FOD/POD workload, particularly when monitoring large PHAs;
4. estimated FHEO staff and time required to complete the full monitoring reviews (includes both in-house and on-site visits);
5. the schedule for the conduct of a FHEO compliance review. Avoid scheduling a monitoring visit during the same calendar year that a PHA is scheduled for an FHEO compliance review. Technical assistance can be provided if a compliance review is pending;
6. whether a PHA is involved in litigation, is a party to a court-ordered consent decree and/or is a party to a Title VI Compliance Agreement or F.H.A. Conciliation Agreement. Avoid monitoring PHAs operating under a compliance agreement; and
7. any requirement during the current program year to submit plans on the status of actions taken to correct previous FHEO monitoring findings or findings resulting from other program reviews.

B. Other factors include:

1. current year operating plans;
2. frequency of monitoring plans;
3. whether a PHA targeted for monitoring in a previous year that was dropped due to a civil rights issue which emerged in a PHA not scheduled for monitoring;

4. PHAs which are scheduled by the Assisted Housing Management Branch, Housing Development Division, or the Office of Public Housing for an occupancy audit or management review; and
 5. PHAs with large ongoing Comprehensive Improvement Assistance Program (CIAP) or Major Reconstruction of Obsolete Projects (MROP) programs involving renovations inside of units.
- 2-3. PREPARATION OF THE MONITORING PLAN. After PHAs are selected for on-site monitoring, the Director, FHEO, shall prepare and distribute a monitoring plan for the fiscal year. The plan should include:
- A. specific PHAs to be monitored;
 - B. name, size, and date of last review, if any;
 - C. month in which the PHAs are to be visited;
 - D. whether visit will be a part of a team effort or conducted by FHEO separately;
 - E. activities and specific areas to be monitored by FHEO staff; and
 - F. name of FHEO staff to conduct the visit.
- 2-4. PRE-VISIT COORDINATION AND PREPARATION (Coordination for On-Site Monitoring). If more than one staff person is conducting on-site monitoring, the areas of responsibility for each participant should be delineated before the on-site visit to avoid duplication of work and unnecessary use of the PHA's time. If only one person is conducting an on-site visit, that individual must complete all necessary preparation and coordination with the appropriate PHA staff.