

Tenant-Based Rental Assistance (TBRA) Monitoring Checklist

In the Guide, pages 80-96

This document summarizes key questions for monitoring TBRA activities. Grantees may wish to use this list as a guide, and add additional, more specific, questions to develop their monitoring tools. Each monitoring question references pages in the HOPWA Grantee Oversight Resource Guide that provide additional information.



Additional information & resources can be found here:
<https://www.hudexchange.info/resources/documents/HOPWARentalAssistanceGuidebook.pdf> and <https://www.hudexchange.info/resource/1025/hopwa-program-administration-toolkit>

HOPWA Grantee Oversight Resource Guide
<https://www.hudexchange.info/resource/1003/hopwa-grantee-oversight-resource-guide/>

Rent Calculation—In the Guide, pages 81-88

Is there adequate documentation to show that the participant rent payments and HOPWA subsidy payments have been calculated as required by HUD? Does the sponsor recertify household composition and rent calculations at least annually?

- Review participant records for:
 - » Documentation of current income (including affidavits of zero income, if applicable)
- The completed rent calculation form includes:
 - » Calculation of gross income and adjusted annual income
 - » Calculation of tenant rent payment
 - » Calculation of HOPWA subsidy payment
 - » Calculation of utility allowance or reimbursement, if applicable
- Verify that participant income verifications and rent calculations are updated at least annually
- Review Earned Income Disregard (EID) documentation, if applicable
- For allowances claimed by the household, review related documentation

Leases—In the Guide, page 89

Is a lease that meets state and local standards in place for each participant receiving TBRA?

- Verify that leases are for one year, renewable, and signed and dated by the participant and landlord. A lease may be less than one year if a shorter term offers improved housing opportunities for participants and is a local standard practice.
- Verify that leases do not contain language prohibited by HUD

Housing Quality/Habitability Standards—In the Guide, pages 90-91

Do participant files verify that inspections for housing quality/habitability standards are being conducted in connection with providing TBRA?

- Verify that prior to occupancy by the HOPWA-funded tenant, the unit was inspected and approved by the sponsor and that any deficiencies noted were addressed by the landlord

- Verify that all inspections are signed and dated and occur at least annually
- Review the sponsor's annual inspection tracking tools

Fees—In the Guide, pages 91-92

Are rental assistance projects charging participant rents as the only participant fee?

- Verify in participant files that no additional fees are charged
- Review marketing materials and application packages to verify that they do not indicate additional fees

Comparable Rents Checked—In the Guide, page 92

Are the rents being paid to property owners by the sponsor comparable to rents for non-assisted units, and reasonable, given market conditions?

- Verify that participant files contain complete rent reasonableness forms or checklists, comparing the assisted unit to comparable unassisted units
- Verify that no units were assisted if rent reasonableness standards are not met, even if the unit is under the Fair Market Rent standard
- Verify that rent reasonableness forms were completed prior to initial lease-up, moves to new units, or when rent increases are requested by the landlord

Lead Paint & Fire Safety—In the Guide, pages 93-95

Do participant files verify that federal regulations concerning lead-based paint and fire safety are being followed in connection with providing rental assistance?

- Lead paint requirements apply to program participants when:
 - » A child under the age of 6 is part of the HOPWA-assisted household, and the property was constructed before 1978
- For households meeting the above criteria, verify that:
 - » Households received HUD's "Protect Your Family from Lead in the Home"

- » Signed and dated receipt of pamphlet in participant file
- » Household received a copy of landlord's disclosure of known lead paint
 - » Signed and dated by both the landlord and participant
- » As part of the Housing Quality/Habitability inspection—both at move-in and annually—verify visual assessment of paint by project staff
- » Review any paint-stabilization work as noted in participant files
- » Review sponsor written procedures outlining responses to any child under the age of 6 found with elevated lead levels
- The fire safety requirements section should be included on the Housing Quality/Habitability Inspection form
 - » Verify that inspection forms include documentation of applicable smoke detectors on all levels in the unit, including basements. Unfinished attics are not applicable.
 - » Verify on the inspection form that buildings that are four or more stories, constructed after 1994, have hard-wired smoke detectors and automatic sprinkler systems

Manufactured Housing—In the Guide, pages 95-96

If the sponsor has participants receiving TBRA in manufactured housing, does the manufactured housing meet HUD regulations?

- Verify that utility connections are permanent
- Verify that the land is either leased or owned by the participant
 - » Copy of a deed or tax form
 - » Land rental agreement
- Verify via Housing Quality/Habitability inspection that the housing is permanently attached to a foundation and passes overall inspection