

# CITY OF LAUDERHILL



SHIP LOCAL HOUSING ASSISTANCE PLAN (LHAP)

2025-2026, 2026-2027, 2027-2028

**Table of Contents**

<b>Description</b>	<b>Page #</b>
<b>Section I, Program Details</b>	<b>3</b>
<b>Section II, Housing Strategies</b>	<b>7</b>
A. Purchase Assistance with or without Rehabilitation	<b>7</b>
B. Owner-Occupied Rehabilitation	<b>8</b>
C. Emergency Repair	<b>9</b>
D. Disaster/Pandemic Recovery	<b>11</b>
E. Pandemic Assistance	<b>12</b>
F. Foreclosure Prevention	<b>13</b>
<b>Section III, Incentive Strategies</b>	<b>14</b>
A. Expedited Permitting	<b>14</b>
B. Ongoing Review Process	<b>14</b>
C. Density Flexibility Allowance	<b>14</b>
D. Flexible Lot Allowance	<b>14</b>
E. Street Requirement Modifications	<b>14</b>
F. Modification of Impact Fees	<b>14</b>
G. Printed Inventory	<b>14</b>
H. Development Neat Transportation HUBS	<b>14</b>
<b>Exhibits</b>	15
A. Administrative Budget for each fiscal year covered in the Plan	
B. Timeline for Estimated Encumbrance and Expenditure	
C. Housing Delivery Goals Chart (HDGC) For Each Fiscal Year Covered in the plan	
D. Signed LHAP Certification	
E. Signed, dated, witnessed or attested adopting resolution	
F. Ordinance: (If changed from the original creating ordinance)	

G. Interlocal Agreement	
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**I. Program Details:**

**A. LG(s)**

Name of Local Government	City of Lauderhill
Does this LHAP contain an interlocal agreement?	No
If yes, name of other local government(s)	N/A

**B. Purpose of the program:**

- To meet the housing needs of the very low, low, and moderate-income households;
- To expand production of and preserve affordable housing; and
- To further the housing element of the local government comprehensive plan, specific to affordable housing.

**C. Fiscal years covered by the Plan: 2025-2026, 2026-2027, 2027-2028**

**D. Governance:** The SHIP Program is established in accordance with Section 420.907-9079, Florida Statutes, and Chapter 67-37, Florida Administrative Code. Cities and Counties must be in compliance with these applicable statutes, rules and any additional requirements as established through the Legislative process.

**E. Local Housing Partnership:** The SHIP Program encourages building active partnerships between government, lending institutions, builders and developers, not-for-profit and community-based housing providers and service organizations, providers of professional services related to affordable housing, advocates for low-income persons, real estate professionals, persons or entities that can provide housing or support services and lead agencies of the local continuums of care.

**F. Leveraging:** The Plan is intended to increase the availability of affordable residential units by combining local resources and cost saving measures into a local housing partnership and using public and private funds to reduce the cost of housing. SHIP funds may be leveraged with or used to supplement other Florida Housing Finance Corporation programs and to provide local match to obtain federal housing grants or programs.

**G. Public Input:** Public input was solicited through face to face or virtual meetings with housing providers, social service providers and local lenders and neighborhood associations. Public input was solicited through the local newspaper in the advertising of the Local Housing Assistance Plan and the Notice of Funding Availability.

**H. Advertising and Outreach:** SHIP funding availability shall be advertised in a newspaper of general circulation and periodicals serving ethnic and diverse neighborhoods, at least 30 days before the beginning of the application period. If no funding is available due to a waiting list, no notice of funding availability is required.

**I. Waiting List/Priorities:** A waiting list will be established when there are eligible applicants for strategies that no longer have funding available. Those households on the waiting list will be notified of their status. Applicants will be maintained in an order that is consistent with the time completed applications were submitted as well as any established funding priorities as described in this plan.

The following priorities for funding (very low income, Special Needs, etc.) described/listed here apply to all strategies unless otherwise stated in an individual strategy in Section II:

1. Special Needs – Very Low
2. Special Needs – Low
3. Very Low
4. Low
5. Special Needs – Moderate
6. Essential Service Personnel
7. Moderate

- J. Discrimination:** In accordance with the provisions of ss.760.20-760.37, it is unlawful to discriminate on the basis of race, color, religion, sex, national origin, age, handicap, or marital status in the award application process for eligible housing.
- K. Support Services and Counseling:** Support services are available from various sources. Available support services may include, but are not limited to: Homeownership Counseling (Pre and Post), Credit Counseling, Tenant Counseling, Foreclosure Counseling and Transportation.
- L. Purchase Price Limits:** The sales price or value of new or existing eligible housing may not exceed 90% of the average area purchase price in the statistical area in which the eligible housing is located. Such average area purchase price may be that calculated for any 12-month period beginning not earlier than the fourth calendar year prior to the year in which the award occurs. The sales price of new and existing units, which can be lower but may not exceed 90% of the average area purchase price established by the U.S. Treasury Department or as described above.

The methodology used is:

U.S. Treasury Department	X
Local HFA Numbers	

- M. Income Limits, Rent Limits and Affordability:** The Income and Rent Limits used in the SHIP Program are updated annually by the Department of Housing and Urban Development and posted at [www.floridahousing.org](http://www.floridahousing.org).

*“Affordable” means that monthly rents or mortgage payments including taxes and insurance do not exceed 30 percent of that amount which represents the percentage of the median annual gross income for the households as indicated in Sections 420.9071, F.S. However, it is not the intent to limit an individual household’s ability to devote more than 30% of its income for housing, and housing for which a household devotes more than 30% of its income shall be deemed Affordable if the first institutional mortgage lender is satisfied that the household can afford mortgage payments in excess of the 30% benchmark and in the case of rental housing does not exceed those rental limits adjusted for bedroom size.*

- N. Welfare Transition Program:** Should an eligible sponsor be used, a qualification system and selection criteria for applications for Awards to eligible sponsors shall be developed, which includes a description that demonstrates how eligible sponsors that employ personnel from the Welfare Transition Program will be given preference in the selection process.
- O. Monitoring and First Right of Refusal:** In the case of rental housing, the staff and any entity that has

administrative authority for implementing the local housing assistance plan assisting rental developments shall annually monitor and determine tenant eligibility or, to the extent another governmental entity provides periodic monitoring and determination, a municipality, county or local housing financing authority may rely on such monitoring and determination of tenant eligibility. However, any homeownership or rental loan or grant listed in this plan in the original amount of \$10,000 or less shall not be subject to these annual monitoring and determination of tenant eligibility requirements. Tenant eligibility will be monitored annually for no less than 15 years or the term of assistance whichever is longer unless as specified above. Eligible sponsors that offer rental housing for sale before 15 years or that have remaining mortgages funded under this program must give a first right of refusal to eligible nonprofit organizations for purchase at the current market value for continued occupancy by eligible persons.

- P. Administrative Budget:** A line-item budget is attached as Exhibit A. The city/county finds that the moneys deposited in the local housing assistance trust fund are necessary to administer and implement the local housing assistance plan.

**Section 420.9075 Florida Statute and Chapter 67-37, Florida Administrative Code, states:** “A county or an eligible municipality may not exceed the 5 percent limitation on administrative costs, unless its governing body finds, by resolution, that 5 percent of the local housing distribution plus 5 percent of program income is insufficient to adequately pay the necessary costs of administering the local housing assistance plan.”

**Section 420.9075 Florida Statute and Chapter 67-37, Florida Administrative Code, further states:** “The cost of administering the program may not exceed 10 percent of the local housing distribution plus 5 percent of program income deposited into the trust fund, except that small counties, as defined in s. 120.52(19), and eligible municipalities receiving a local housing distribution of up to \$350,000 may use up to 10 percent of program income for administrative costs.” The applicable local jurisdiction has adopted the above findings in the resolution attached as Exhibit E.

- Q. Program Administration:** Administration of the local housing assistance plan will be performed by:

Entity	Duties	Admin. Fee Percentage
Local Government	Administration, Implementation, Monitoring (Application intake, verification, eligibility determination, advertising, reporting, AHAC meetings, invoice processing)	10%
Third Party Entity/Sub-recipient	N/A	N/A

- R. First-time Homebuyer Definition:** For any strategies designed for first-time homebuyers, the following definition will apply: *An individual who has had no ownership in a principal residence during the 3-year period ending on the date of purchase of the property. This includes a spouse (if either meets the above test, they are considered first-time homebuyers). A single parent who has only owned a home with a former spouse while married. An individual who is a displaced homemaker and has only owned with a spouse. An individual who has only owned a principal residence not permanently affixed to a permanent foundation in accordance with applicable regulations. An individual who has only owned a property that was not in compliance with state, local or model building codes and which cannot be brought into compliance for less than the cost of constructing a permanent structure.*

- S. Project Delivery Costs:** In addition to the administrative costs listed above, the City of Lauderhill will assess no more than 8% for project delivery fees for owner-occupied, disaster, and emergency repair strategies. Project delivery costs

will include preparation of inspections (initial, interim, and final), work specifications, title searches, and lead-based paint testing performed by a third-party, pre-bid walkthroughs, bid reviews, construction oversight if necessary, non-city employee fees associated with file maintenance, reporting customer relations, and other duties as assigned. The fees will be as per contract with the professional entities providing the services, and will be included in the recorded second mortgage amount.

The City of Lauderhill will provide \$900.00 project delivery cost to the procured agency to provide application assistance and housing counseling for each approved file. This amount will be included in the recorded mortgage and note.

**T. Essential Service Personnel Definition (ESP):** **ESP includes** teachers and educators, other school district, community college, and university employees, police and fire personnel, health care personnel, and skilled building trades personnel.

**U. Describe efforts to incorporate Green Building and Energy Saving products and processes:** The City will, when economically feasible, employ the following Green Building requirements on rehabilitation and emergency repairs:

1. Low or No-VOC paint for all interior walls (Low-VOC means 50 grams per liter or less for flat paint; 150 grams per liter or less for non-flat paint);
2. Low-flow water fixtures in bathrooms – WaterSense labeled products or the following specifications:
  - i. Toilets: 1.6 gallons/flush or less;
  - ii. Faucets: 1.5 gallons/minute or less;
  - iii. Showerheads: 2.2 gallons/minute or less;
3. Energy Star qualified refrigerator, if provided;
4. Energy Star qualified dishwasher, if provided;
5. Energy Star qualified washing machine, if provided;
6. Energy Star qualified exhaust fans in all bathrooms, if provided;
7. Air conditioning: minimum SEER of 14. Packaged units are allowed in studios and one bedroom units with a minimum of 11.7 SEER.
8. Energy Star qualified light fixtures/ceiling fans, if provided;
9. Energy Star qualified light bulbs; and
10. Energy Star qualified water heaters, if applicable.

**V. Describe efforts to meet the 20% Special Needs set-aside:** The City collaborates with social service agencies serving the designated special needs populations to achieve the goal of the special needs set-aside. The goals will primarily be met through the Owner-Occupied Rehabilitation, Purchase Assistance, and Emergency Repair strategies.

**W. Describe efforts to reduce homelessness:** As a part of the Broward HOME Consortia, the City collaborates with the Broward Continuum of Care to serve the homeless population. Individuals and families are to contact Broward 2-1-1 to open a case and be placed in programs available to them based on need.

**Section II. LHAP Strategies (Please read LHAP Strategy Quick Guide before developing strategies):**

<b>A. PURCHASE ASSISTANCE WITH OR WITHOUT REHABILITATION</b>	Code 1, 2
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- a. Summary: Funds will be awarded for down payment, closing costs, mortgage buy down, principal buy down, and other costs associated with purchasing a home. Eligible housing includes existing or newly constructed (with a Certificate of Occupancy) single-family homes, townhomes, and condominiums located within the city limits of Lauderhill. Eligible households may additionally qualify for rehabilitation to address improvements needed for safe, and sanitary habitation, as well as accessibility improvements for Special Needs applicants.
- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
- c. Income Categories to be served: Very Low, Low, and Moderate
- d. Maximum award: Up to \$75,000 for Very Low income; Up to \$65,000 for Low income; and Up to \$40,000 for Moderate income. The total cost of repairs cannot exceed \$10,000.
- e. Terms:
1. Repayment loan/deferred loan/grant: Funds will be awarded as a Deferred Payment Loan secured by a recorded subordinate mortgage and note.
  2. Interest Rate: 0%
  3. Years in loan term: 5 years for Special Needs as defined by Florida Statute 420.0004 (13), 10 years for Moderate, and 15 years for all other applicants.
  4. Forgiveness: Loan will be forgiven on a prorated annual basis -20% per year for 5 year terms, 10% per year for 10 year terms, and 4.33% per year for 15 year terms.
  5. Repayment: No repayment required so long as the loan is in good standing.
  6. Default: The loan will be determined to be in default if any of the following occurs during the loan term: sale; transfer, or conveyance of property; conversion to a rental property; loss of homestead exemption status; failure to occupy the home as their primary residence; or obtains a reverse mortgage. If any of these occur, the outstanding balance of the loan will be due and payable.
- In cases where the qualifying homeowner(s) die(s) during the loan term, the loan may be assumed by an income eligible heir who will occupy the home as their primary residence. If the legal heir is not SHIP eligible or chooses not to occupy the home, the outstanding balance of the loan will be due and payable.
- If the home is foreclosed on by a superior mortgage holder, the city will make an effort to recapture funds through the legal process if it is determined that adequate funds may be available to justify pursuing a repayment.
- f. Recipient/Tenant Selection Criteria: Applicants are accepted on a first-qualified, first-closed, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan. Applicant must be a first-time homebuyer as defined in Section I. (R) of this plan. Applicant cannot own any real estate.
- g. Sponsor Selection Criteria: N/A
- h. Additional Information:
1. The applicant must receive a mortgage commitment from a first mortgage lender licensed under Part III of Chapter 494, Florida Statutes, and the lender must adhere to the City's underwriting guidelines.

2. The applicant must attend and complete an 8-hour HUD-approved Homebuyer Education Course prior to the submission of an application.
3. The applicant must contribute no less than 3% of the purchase price towards the down-payment. At least 1% of the purchase price must be contributed from the applicant’s own funds; the remaining 2% may come from a non-borrowed source. Funds may be in the form of a gift, so long as the source of the gift is revealed.
4. The combination of awards is to assist with down payment and repairs, which may not exceed \$10,000.00.
5. Assisted properties must have property insurance.
6. The City will fall in no less than second position in the lien placement process.
7. Applicants may not exceed the allowed cash value assets that exceed \$40,000 after closing will not be considered. Exclusions are defined in accordance with 24 CFR 5.609(c). Cash value is defined as dollars expressed in an applicant’s account under any investment election or the total thereof, including rental property.
8. The maximum will not be awarded in all cases.
9. Under this strategy, an applicant can only receive assistance once in a lifetime, except following a disaster as declared by an Executive Order issued by the President of the United States or the Governor of the State of Florida.
10. The City’s administrative policy allows for “Permitted Refinancing” and subordination for the purpose of refinancing an existing debt that is in a superior lien position to the Program Loan. The City’s Subordination Policy is attached as Exhibit “H” and may be amended from time to time. Subordination restrictions:
  - a. Subordination of the Program Loan will not be approved for a purpose other than to refinance the mortgage debt to secure a lower interest rate, decrease the loan term, or reduce the monthly payment that was secured by the subject property on the same date of the Program Loan.
  - b. The City will agree to a subordination for a simple refinance no more than once during the course of the Program Loan.

<b>B. OWNER OCCUPIED REHABILITATION</b>	Code 3
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a. Summary: Funds will be awarded to households in need of repair to correct code violations, health and safety issues, electrical, plumbing, roofing, windows, doors, and other structural items. Cosmetic items may be included if funding is available after completing all required repairs listed above. Kitchen and bathroom repairs are permitted for Special Needs and Elderly recipients only.

- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
- c. Income Categories to be served: Very Low, Low, and Moderate
- d. Maximum award: Up to \$60,000.00, including project delivery costs
- e. Terms:
  1. Repayment loan/deferred loan/grant: Funds will be awarded as a Deferred Payment Loan secured by a recorded subordinate mortgage and note.
  2. Interest Rate: 0%

3. Years in loan term: 5 years for Special Needs as defined by Florida Statute 420.0004 (13) and Elderly as defined by Florida Statute 420.004(8), and 10 years for all other applicants.
4. Forgiveness: Loan will be forgiven on a prorated annual basis 20% per year for 5 year terms and 10% per year for 10 year terms.
5. Repayment: No repayment required so long as the loan is in good standing.
6. Default: The loan will be determined to be in default if any of the following occurs during the loan term: sale; transfer, or conveyance of property; conversion to a rental property; loss of homestead exemption status; failure to occupy the home as their primary residence; or obtains a reverse mortgage. If any of these occur, the outstanding balance of the loan will be due and payable.

In cases where the qualifying homeowner(s) die(s) during the loan term, the loan may be assumed by an income eligible heir who will occupy the home as their primary residence. If the legal heir is not SHIP eligible or chooses not to occupy the home, the outstanding balance of the loan will be due and payable.

If the home is foreclosed on by a superior mortgage holder, the city will make an effort to recapture funds through the legal process if it is determined that adequate funds may be available to justify pursuing a repayment.

- f. Recipient/Tenant Selection Criteria: Applicants are accepted on a first-qualified, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan.
- g. Sponsor Selection Criteria: N/A
- h. Additional Information:
  1. Assistance will only be provided for homes that are owner-occupied and used as a primary residence. Proof of Homestead Exemption is required.
  2. Applicants with reverse mortgages will not be assisted.
  3. The City will only accept first and/or second position in the lien process.
  4. Assisted properties that fall between the moderate or workforce income levels must have property insurance. Special needs, very low, and low applicants will be required to have Flood insurance for assisted properties located in a designated flood zone.
  5. Elderly, as defined by Florida Statute 420.004(8): Families where the head of household or spouse is 62 years of age or older at the time of application.
  6. Applicants are required to be current on all City services (with the exception of code violations if being assisted through this activity to correct), mortgage, and homeowner association fees.
  7. Applicants with a cash value in excess of \$40,000 will not be considered. Applicant must not own any other property used for residential purposes.
  8. Rehabilitation assistance will not include relocation costs.
  9. All rehabilitation work will be performed by contractors on the City's approved contractors list. All work will be performed according to the work write-up specifications, the SHIP Administrator or his/her designee will delete some line items from the bid until the bid does not exceed the maximum award. After such deletion, the lowest most responsive bidder will be awarded the contract. If it is determined that all line items are Building Code related, then all bids will be rejected, and the applicant will be deemed ineligible due to the excessive cost of the rehabilitation project.
  10. Under this strategy, an applicant can only receive assistance once in a lifetime, except following a

disaster as declared by an Executive Order issued by the President of the United States or the Governor of the State of Florida.

11. The City’s administrative policy allows for “Permitted Refinancing” and subordination for the purpose of refinancing an existing debt that is in a superior lien position to the Program Loan. The City’s Subordination Policy is attached as Exhibit “H” and may be amended from time to time. Subordination restrictions:
  - a. Subordination of the Program Loan will not be approved for a purpose other than to refinance the mortgage debt to secure a lower interest rate, decrease the loan term, or reduce the monthly payment that was secured by the subject property on the same date of the Program Loan.
  - b. The City will agree to a subordination for a simple refinance no more than once during the course of the Program Loan.

<b>C. EMERGENCY REPAIR</b>	Code 6
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a. Summary: Funds will be awarded to applicants in need of emergency rehabilitation of their home related to a dire situation that needs to be mitigated immediately. This may include: damaged roofing that is leaking, mold remediation, damaged windows causing exposure to the elements, or electrical problems that could cause damage (fire) to the home or is an immediate health hazard to the occupants. This strategy will only be used for an applicant who has applied for, but not received assistance through the owner-rehabilitation strategy.

- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
- c. Income Categories to be served: Very Low, Low, and Moderate
- d. Maximum award: Up to \$430,000.00, including project delivery costs
- e. Terms:
  1. Repayment loan/deferred loan/grant: Funds will be awarded as a Deferred Payment loan secured by a recorded subordinate mortgage and note.
  2. Interest Rate: 0%
  3. Years in loan term: 5 years for Special Needs as defined by Florida Statute-420.0004 (13) and Elderly as defined by Florida Statute 420.004(8), and 10 years for all other applicants.
  4. Forgiveness: Loan will be forgiven on a prorated annual basis 20% per year for 5 year terms and 10% per year for 10 year terms.
  5. Repayment: No repayment required as long as the loan is in good standing.
  6. Default: The loan will be determined to be in default if any of the following occurs during the loan term: sale; transfer, or conveyance of property; conversion to a rental property; loss of homestead exemption status; failure to occupy the home as their primary residence; or obtains a reverse mortgage. If any of these occur, the outstanding balance of the loan will be due and payable.

In cases where the qualifying homeowner(s) die(s) during the loan term, the loan may be assumed by an income eligible heir who will occupy the home as their primary residence. If the legal heir is not SHIP eligible or chooses not to occupy the home, the outstanding balance of the loan will be due and payable.

If the home is foreclosed on by a superior mortgage holder, the city will make an effort to recapture funds through the legal process if it is determined that adequate funds may be available to justify pursuing a repayment.

- f. Recipient/Tenant Selection Criteria: Applicants will be selected based on the priority of the emergency need as determined by the SHIP Administrator or his/her designee. Priority is based on the appearance of an imminent health hazard that will impact life and safety. If more than one application is received at any given time, applicants will be ranked on a first-qualified, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan.
- g. Sponsor Selection Criteria: N/A
- h. Additional Information:
  1. Assistance will only be provided for homes that are owner-occupied and used as a primary residence. Proof of Homestead Exemption is required.
  2. Applicants with reverse mortgages will not be assisted.
  3. The City will only accept first and/or second position in the lien process.
  4. An applicant requesting an emergency repair will be required to:
    - a. Allow third-party home inspector access to the home for inspections to determine need of repair.
    - b. Moderate and workforce income levels must provide proof of homeowners insurance policy and any proof of whether or not the insurance will cover any part of the repair.
    - c. Uninsured eligible applicants may be assisted on a case-by-case basis, as determined by the City Manager. Criteria: must be Special Needs, Elderly, or fall within the very low or low-income category.
    - d. In the event that a claim is filed, the City may repair damage to the property not covered by the insurance company once the claim has been closed. Proof of claim completion is required.
    - e. If insured, the City will assist with the applicant's deductible up to 50% and/or \$10,000 as a part of the \$430,000 maximum award.
  5. Flood insurance is required for assisted properties located in a designated flood zones.
  6. Elderly, as defined by Florida Statute 420.004(8): Families where the head of household or spouse is 62 years of age or older at the time of application.
  7. Applicants are required to be current on all City services (with the exception of code violations if being assisted through this activity to correct), mortgage, and homeowner association fees.
  8. Applicants with a cash value in excess of \$40,000 will not be considered. Applicant must not own any other property used for residential purposes.
  9. Emergency Repair assistance will not include relocation costs.
  10. All rehabilitation work will be performed by contractors on the City's approved contractors list.
  11. Under this strategy, an applicant can only receive assistance once in a lifetime, except following a disaster as declared by an Executive Order issued by the President of the United States or the Governor of the State of Florida.
  12. The City's administrative policy allows for "Permitted Refinancing" and subordination for the purpose of refinancing an existing debt that is in a superior lien position to the Program Loan. The City's Subordination Policy is attached as Exhibit "H" and may be amended from time to time.

<b>D. DISASTER REPAIR</b>	Code 5
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- a. Summary: Funds will be awarded to applicants in need of home repairs directly caused by a disaster that is declared by an Executive Order of the President or Governor. Repairs will be prioritized as follows :
1. Immediate threats to health and safety (sewage, damaged windows, roofing) in cases where the home is still habitable.
  2. Imminent residual damage to the home (such as damaged caused by a leaking roof) in cases where the home is still habitable.
  3. Repairs necessary to make the home habitable.
  4. Repairs to mitigate dangerous situations (exposed wires).
- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
- c. Income Categories to be served: Very Low, Low, and Moderate
- d. Maximum award up to: Up to \$20,000 – Very Low; Up to \$15,000 – Low and Moderate, including project delivery costs
- e. Terms:
1. Repayment: Grant
  2. Interest Rate: N/A
  3. Years in loan term: N/A
  4. Forgiveness: N/A
  5. Repayment: N/A
  6. Default: N/A
- f. Recipient/Tenant Selection Criteria: Applicants are accepted on a first-qualified, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan.
- g. Sponsor Selection Criteria: N/A
- h. Additional Information:
1. Disaster Recovery will only be allocated from unencumbered funds or additional funds awarded through Florida Housing Finance Corporation for the disaster.
  2. Assistance will only be provided for homes that are owner-occupied and used as a primary residence. Proof of Homestead Exemption is required.
  3. Assisted properties must have property insurance. Flood insurance is required for assisted properties located in a designated flood zones. An applicant requesting an emergency repair will be required to:
    - a. Disclose all storm-related insurance claims on the property prior to consideration for assistance and must file for and use proceeds from insurance as the first option.
    - b. Required to declare assistance received from Federal, State, or private insurance prior to consideration for eligibility.
    - c. Allow third-party home inspector access to the home for inspections to determine need of repair.
  4. Damages covered by homeowners insurance and/or FEMA are not eligible.
  5. Applicants are required to be current on all City services (with the exception of code violations if being

- assisted through this activity to correct), mortgage, and homeowner association fees.
- 6. Applicants with cash assets in excess of \$40,000 will not be considered.
- 7. Disaster Repair assistance will not include relocation costs.
- 8. All rehabilitation work will be performed by contractors that are on the City's approved contractors list.

<b>E. Pandemic Assistance/Health Related Crisis</b>	Code 13
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a. Summary: Funds will be awarded to applicants in need of foreclosure prevention, eviction, security, and/or utility deposit assistance directly caused by a pandemic or health-related emergency as declared by an Executive Order of the President or Governor.
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- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
- c. Income Categories to be served: Very Low, Low, and Moderate
- d. Maximum award: Up to \$10,000
- e. Terms:
  - 1. Repayment: Grant
  - 2. Interest Rate: N/A
  - 3. Years in loan term: N/A
  - 4. Forgiveness: N/A
  - 5. Repayment: N/A
  - 6. Default: N/A
- f. Recipient/Tenant Selection Criteria: Those who income qualify based on self-certification and documented hardship on a first-qualified, first served basis.
- g. Sponsor/Sub-recipient Selection Criteria: N/A
- h. Additional Information: Pandemic assistance will only be allocated from unencumbered funds or additional funds awarded through Florida Housing Finance Corporation for the pandemic.

Assistance will be provided to those with a documented impact due to the current pandemic or health emergency or future national health per executive order. Payments will be made directly to the lender, landlord, and/or utility agent. Funding may also be used towards legal aid assistance to prevent foreclosure and rental proceedings.

Funding will be used to pay past due balances back to the date the Executive Order was issued. Future payments will only be made if authorized by Florida Housing Finance Corporation.

<b>F. Foreclosure Prevention</b>	Code 7
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a. Summary: Funds will be awarded to households in arrears on their first mortgage. Arrears must be at least three (3) months, but no more than six (6) months. Property cannot be under an active foreclosure.

b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028

c. Income Categories to be served: Very Low, Low, and Moderate

d. Maximum award: Up to \$10,000

e. Terms:

1. Repayment loan/deferred loan/grant: Funds will be awarded as a Deferred Payment loan secured by a recorded subordinate mortgage and note.
2. Interest Rate: 0%
3. Years in loan term: 5 Years
4. Forgiveness: Loan is forgiven 20% per year for 5 year terms.
5. Repayment: No repayment required as long as the loan is in good standing.
6. Default: The loan will be determined to be in default if any of the following occurs during the loan term: sale; transfer, or conveyance of property; conversion to a rental property; loss of homestead exemption status; failure to occupy the home as their primary residence; or obtains a reverse mortgage. If any of these occur, the outstanding balance of the loan will be due and payable.

In cases where the qualifying homeowner(s) die(s) during the loan term, the loan may be assumed by an income eligible heir who will occupy the home as their primary residence. If the legal heir is not SHIP eligible or chooses not to occupy the home, the outstanding balance of the loan will be due and payable.

If the home is foreclosed on by a superior mortgage holder, the city will make an effort to recapture funds through the legal process if it is determined that adequate funds may be available to justify pursuing a repayment.

f. Recipient/Tenant Selection Criteria: Applicants will be assisted on a first-qualified, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan.

g. Sponsor/Sub-recipient Selection Criteria: N/A

h. Additional Information:

1. Applicants must comply with the following:
  - a. Provide proof of arrearage in the form of notification from the conventional mortgage lender/holder. Private mortgages are not acceptable. Private mortgage holder is defined as a loan created between private individuals for the purchase of real estate (i.e. friends, family members, colleagues, or investment firms).
  - b. Provide evidence of hardship that caused the arrearage (health-related, loss of employment, death of household member, divorce).
  - c. Provide a written statement as evidence of the ability to resume making payments after funding is used, which includes an explanation of how the hardship has been overcome and an indication of

the budget plan that will allow for resumption of payments.

- d. Proof of completion of foreclosure prevention counseling provided by a HUD-certified third-party agency is mandatory prior to the release of funding.

<b>G. Rental Assistance &amp; Security Deposits</b>	Code 13, 23
---	-------------

- |    |  |
|----|--|
| a. | Summary: Funds will be awarded to households in need of one-time assistance to obtain a lease on a rental unit and qualify under Florida Statute 420.9072 (7)(b). This may include security deposits, and eviction prevention. Arrears must be at least three (3) months, but no more than six (6) months. |
|----|--|
- b. Fiscal Years Covered: 2025-2026, 2026-2027, 2027-2028
  - c. Income Categories to be served: Very Low, and Low
  - d. Maximum award: Up to \$5,000
  - e. Terms:
    - 7. Repayment loan/deferred loan/grant: Grant
    - 8. Interest Rate: N/A
    - 9. Years in loan term: N/A
    - 10. Forgiveness: N/A
    - 11. Repayment: N/A
    - 12. Default: N/A
  - f. Recipient/Tenant Selection Criteria: Applicants will be assisted on a first-qualified, first-served basis with priorities for Special Needs, Essential Services Personnel, and income groups as described in this Section I. (I) of this plan.
  - g. Sponsor/Sub-recipient Selection Criteria: N/A
  - h. Additional Information:
    - 1. Funds for Rental Assistance/Security Deposits will only be implemented in the event that the program receives sufficient program income to support this strategy.
    - 2. Applicants must comply with the following:
      - a. Eviction Prevention:
        - Provide proof of arrearage in the form of a tenant ledger along with an active lease.
        - Landlord must be willing to sign a Landlord Affidavit to Rescind the Eviction process.
      - b. Move-In Assistance:
        - Provide an active lease from the potential landlord.
        - Landlord must be willing to sign a Landlord Agreement.
      - c. Provide evidence of hardship that caused the arrearage (health-related, loss of employment, death of a household member, divorce).
      - d. Provide a written statement as evidence of the ability to resume making payments after funding is used, which includes an explanation of how the hardship has been overcome and an indication of the budget plan that will allow for resumption of payments.
      - e. No month-to-moth leases are eligible.

- f. Under this strategy, an applicant can only receive assistance once in a lifetime
- g. Assistance will be paid directly to the housing provider on behalf of the applicant.

### III. LHAP Incentive Strategies

In addition to the **required Incentive Strategy A and Strategy B**, include all adopted incentives with the policies and procedures used for implementation as provided in Section 420.9076, F.S.:

A. Name of the Strategy: **Expedited Permitting**

Affordable housing rehabilitation permits will be given priority and expedited to a greater degree and shall not exceed a turnaround period of more than 7 business days in the future.

B. Name of the Strategy: **Ongoing Review Process**

Through the AHAC Committee, the City will review local policies, ordinances, regulations, and plan provisions on a quarterly basis to monitor the increase cost of housing prior to their adoption. All recommendations will be discussed and recommended to the City Commission in December of each year. If the recommendations of Commission are accepted, the Mayor will work with City staff to implement the requested commendations.

C. Name of the Strategy: **Density Flexibility Allowance**

City will implement the allowance of flexibility in densities for affordable housing as outlined in the Land and Development Regulations (LDR).

D. Name of the Strategy: **Flexible Lot Allowance**

City will implement the allowance of flexible lot configurations, including zero-lot-line configurations as outlined in the LDR.

E. Name of the Strategy: **Street Requirement Modifications**

Modifications will be implemented as outlined in the City's LDR.

F. Name of Strategy: **Modification of Impact Fees**

Impact fees are managed by Broward County for roads and schools. The only fee the City has control over is the concurrency fee. Fees will be reviewed by the City Engineer for consideration.

G. Name of Strategy: **Printed Inventory**

A list of inventory of locally owned public lands suitable for affordable housing is prepared and updated by the City's GIS Manager. This information is readily available on the City's website.

H. Name of Strategy: **Development Near Transportation HUBS**

The City will continue utilizing the designated TOC SR 7 to provide for the development of mixed-

use projects.

**IV. EXHIBITS:**

Required

- A. Administrative Budget for each fiscal year covered in the Plan.
- B. Timeline for Estimated Encumbrance and Expenditure.
- C. Housing Delivery Goals Chart (HDGC) For Each Fiscal Year Covered in the plan.
- D. Signed LHAP Certification.
- E. Signed, dated, witnessed, or attested adopting resolution.

Optional

- F. Ordinance: (If changed from the original creating ordinance).
- G. Interlocal Agreement (Required if applicable).
- H. Other Documents Incorporated by Reference. Subordination Policy

**(Local Government name)**

Fiscal Year: 2025-2026	
Estimated SHIP Funds for Fiscal Year:	\$ 565,390.00
Salaries and Benefits	\$ 48,656.00
Office Supplies and Equipment	\$ 1,500.00
Travel Per diem Workshops, etc.	\$ 3,983.00
Advertising	\$ 2,400.00
Other*	\$
<b>Total</b>	<b>\$ 56,539.00</b>
Admin %	10.00%
	<b>OK</b>

Fiscal Year 2026-2027	
Estimated SHIP Funds for Fiscal Year:	\$ 565,390.00
Salaries and Benefits	\$ 48,656.00
Office Supplies and Equipment	\$ 1,500.00
Travel Per diem Workshops, etc.	\$ 3,983.00
Advertising	\$ 2,400.00
Other*	\$
<b>Total</b>	<b>\$ 56,539.00</b>
Admin %	10.00%
	<b>OK</b>

Fiscal Year 2027-2028	
Estimated SHIP Funds for Fiscal Year:	\$ 565,390.00
Salaries and Benefits	\$ 48,656.00
Office Supplies and Equipment	\$ 1,500.00
Travel Per diem Workshops, etc.	\$ 3,983.00
Advertising	\$ 2,400.00
Other*	\$
<b>Total</b>	<b>\$ 56,539.00</b>
Admin %	10.00%
	<b>OK</b>

\*All "other" items need to be detailed here and are subject to review and approval by the SHIP review committee. Project Delivery Costs that are outside of administrative costs are not to be included here, but must be detailed in the LHAP main document.

Details:

**Exhibit B**  
**Timeline for SHIP Expenditures**

**City of Lauderhill** affirms that funds allocated for these fiscal years will  
*(local government)*  
meet the following deadlines:

<b>Fiscal Year</b>	<b>Encumbered</b>	<b>Expended</b>	<b>Closeout Report</b>
<b>2025-2026</b>	6/30/2027	6/30/2028	9/15/2028
<b>2026-2027</b>	6/30/2028	6/30/2029	9/15/2029
<b>2027-2028</b>	6/30/2029	6/30/2030	9/15/2030

If funds allocated for these fiscal years is not anticipated to meet expenditure deadlines, Florida Housing Finance Corporation should be notified according to the following dates:

<b>Fiscal Year</b>	<b>Funds Not Expended</b>	<b>Closeout AR Not Submitted</b>
<b>2022-2023</b>	3/30/2028	6/15/2028
<b>2023-2024</b>	3/30/2029	6/15/2029
<b>2024-2025</b>	3/30/2030	6/15/2030

**Requests for Expenditure Extensions (close-out year ONLY) must be emailed to [robert.dearduff@floridahousing.org](mailto:robert.dearduff@floridahousing.org) and [kathy.cutler@floridahousing.org](mailto:kathy.cutler@floridahousing.org) and include:**

1. A statement that “(city/county) requests an extension to the expenditure deadline for fiscal year \_\_\_\_\_.
2. The amount of funds that is not expended.
3. The amount of funds that is not encumbered or has been recaptured.
4. A detailed plan/timeline of how/when the money will be expended.

*Note: an extension to the expenditure deadline (June 30) does not relieve the requirement to submit (September 15) the annual report online detailing all funds that have been expended.*

**Other Key Deadlines:**

AHAC reports are now due annually by December 31. Local governments receiving the minimum (or less) allocation may choose not to report.

ACFR financial statements are due each June 30 for the report ending September 30 of the previous year.

FLORIDA HOUSING FINANCE CORPORATION												
HOUSING DELIVERY GOALS CHART												
2027-2028												
Name of Local Government:			City of Lauderhill									
Estimated Funds (Anticipated allocation only):			\$ 565,390									
Code	Strategies	Qualifies for 75% set-aside	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	Mod Units	Max. SHIP Award	New Construction	Without Construction	Total	Units
	Homeownership											
1, 2	Purchase Assistance with/without Rehab	Yes			2	\$65,000			\$130,000.00	\$0.00	\$130,000.00	2
3	Owner Occupied Rehabilitation	Yes	3	\$60,000	2	\$60,000	1	\$40,000	\$340,000.00	\$0.00	\$340,000.00	6
6	Emergency Repair	Yes	1	\$30,000					\$30,000.00	\$0.00	\$30,000.00	1
5	Disaster Repair	Yes	0	\$20,000					\$0.00	\$0.00	\$0.00	0
5,16	Pandemic Assistance/Health Related Crisis	No	0	\$10,000					\$0.00	\$0.00	\$0.00	0
7	Foreclosure Prevention	No	0	\$10,000					\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
	<b>Total Homeownership</b>		4		4		1		\$500,000.00	\$0.00	\$500,000.00	9
Purchase Price Limits:			New	\$ 636,806	Existing	\$ 636,806						

OK OK

Code	Rental	Qualifies for 75% set-aside	VLI Units	Max. SHIP Award	LI Units	Max. SHIP Award	Mod Units	Max. SHIP Award	New Construction	Without Construction	Total	Units
13, 23	Rental Assistance & Security Deposits	No	0	\$5,000					\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
									\$0.00	\$0.00	\$0.00	0
	<b>Total Rental</b>		0		0		0		\$0.00	\$0.00	\$0.00	0
	Administration Fees		\$ 56,539		10%		OK					
	Home Ownership Counseling		\$ -									
<b>Total All Funds</b>			\$ 556,539		OK							

Set-Asides

Percentage Construction/Rehab (75% requirement)		88.4%	OK
Homeownership % (65% requirement)		88.4%	OK
Rental Restriction (25%)		0.0%	OK
Very-Low Income (30% requirement)	\$ 210,000	37.1%	OK
Low Income (30% requirement)	\$ 250,000	44.2%	OK
Moderate Income	\$ 40,000	7.1%	

**CERTIFICATION TO  
FLORIDA HOUSING FINANCE CORPORATION**

Local Government or Interlocal Entity:

City of Lauderhill
--------------------

Certifies that:

- (1) The availability of SHIP funds will be advertised pursuant to program requirements in 420.907-420.9079, Florida Statutes.
- (2) All SHIP funds will be expended in a manner which will ensure that there will be no discrimination on the basis of race, color, national origin, sex, handicap, familial status, or religion.
- (3) A process to determine eligibility and for selection of recipients for funds has been developed.
- (4) Recipients of funds will be required to contractually commit to program guidelines and loan terms.
- (5) Florida Housing will be notified promptly if the local government /interlocal entity will be unable to comply with any provision of the local housing assistance plan (LHAP).
- (6) The LHAP provides a plan for the encumbrance of funds within twelve months of the end of the State fiscal year in which they are received and a plan for the expenditure of SHIP funds including allocation, program income and recaptured funds within 24 months following the end of the State fiscal year in which they are received.
- (7) The LHAP conforms to the Local Government Comprehensive Plan, or that an amendment to the Local Government Comprehensive Plan will be initiated at the next available opportunity to insure conformance with the LHAP.
- (8) Amendments to the approved LHAP shall be provided to the Florida Housing for review and/or approval within 21 days after adoption.
- (9) The trust fund exists with a qualified depository for all SHIP funds as well as program income or recaptured funds.
- (10) Amounts on deposit in the local housing assistance trust fund shall be invested as permitted by law.

- (11) The local housing assistance trust fund shall be separately stated as a special revenue fund in the local governments audited financial statements (ACFR). An electronic copy of the ACFR or a hyperlink shall be provided to Florida Housing by June 30 of the applicable year.
- (12) Evidence of compliance with the Florida Single Audit Act, as referenced in Section 215.97, F.S. shall be provided to Florida Housing by June 30 of the applicable year.
- (13) SHIP funds will not be pledged for debt service on bonds.
- (14) Developers receiving assistance from both SHIP and the Low-Income Housing Tax Credit (LIHTC) Program shall comply with the income, affordability and other LIHTC requirements, similarly, any units receiving assistance from other federal programs shall comply with all Federal and SHIP program requirements.
- (15) Loans shall be provided for periods not exceeding 30 years, except for deferred payment loans or loans that extend beyond 30 years which continue to serve eligible persons.
- (16) Rental Units constructed or rehabilitated with SHIP funds shall be monitored for compliance with tenant income requirements and affordability requirements or as required in Section 420.9075 (3)(e). To the extent another governmental entity provides periodic monitoring and determination, a municipality, county or local housing financing authority may rely on such monitoring and determination of tenant eligibility.
- (17) The LHAP meets the requirements of Section 420.907-9079 FS, and Rule Chapter 67-37 FAC.
- (18) The provisions of Chapter 83-220, Laws of Florida have not been implemented (except for Miami-Dade County).

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Chief Elected Official or designee

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Type Name and Title

\_\_\_\_\_  
Date

**OR**

\_\_\_\_\_  
Attest:

(Seal)



**CITY OF LAUDERHILL SUBRECIPIENT POLICY**

The City of Lauderhill's Subrecipient Program ensures compliance with civil rights and 2 CFR Ch.II (1-1-17 Edition) Section 200.331 "Requirements for Pass-Through Entities", 2 CFR 200.332(b), (d) (3), and (f) "Subrecipient Monitoring", and Subpart F of 2 CFR 200, 2 CFR 200.339, CFR 200.505 "Subrecipient Audit Requirements. 45 CFR 75 defines a Subrecipient as a non-Federal entity that receives a subaward from a pass-through entity of Federal awarding agency to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.

**Pass-through Requirements**

The City of Lauderhill, as a pass-through entity, ensures Subawards with the Subrecipient are clearly identified to subrecipient as a subaward and will contain the following information to ensure that every subaward is clearly identified to the subrecipient as a subaward and includes the following information at the time of the subaward and if any of these data elements change, include the changes in subsequent subaward modification. When some of this information is not available, the City will provide the best information available to describe the Federal award and subaward.

**1. Required Information for Subaward Agreement**

Federal Award Identification:
Subrecipient name
Subrecipient's unique entity identifier
Federal award identification number
Date of federal award to City
Subaward period of performance start and end date
Subaward budget period start and end date
Amount of federal funds obligated by this action by City to the subrecipient
Total amount of federal funds obligated to subrecipient including current obligation
Total amount of federal award committed to subrecipient
Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)
Name of Federal awarding agency, City, and contact information for awarding official of the City
CFDA Number and Name; the City will identify the dollar amount made available under each Federal award and the CFDA number at time of disbursement
Identification of whether the award is Research & Development (only as applicable)
Indirect cost rate for the Federal award (including if the de minimis rate is charged, as applicable)
All requirements imposed on subrecipient in order for City to meet responsibility to awarding Federal Agency – including identification of any required financial and performance reports
Any additional requirements City imposes on subrecipient in order to meet the Federal Agency's requirements including identification of any required financial and performance reports.
An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate negotiated between the City

and the subrecipient (in compliance with federal regulations), or a de minimis indirect cost rate; as applicable
A requirement that the subrecipient permit the City and Auditors to have access to the subrecipient's records and financial statements as necessary to meet federal award requirements
Appropriate terms and conditions concerning closeout of the subaward

## 2. Subrecipient Selection and Risk Assessment

The City will solicit applications from an open competitive Request for Proposal (RFP).

- Eligible organizations will be defined based on the Federal Agency's type of award criteria
- Ineligible organizations cannot be debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from participation in any Federal Department or Agency and cannot be delinquent on repayment of any Federal debt including direct and guaranteed loans and other debt as defined in OMB Circular A-129, "Managing Federal Credit Programs"
- Selection Procedure consists of a review committee to evaluate all responses to the RFP that meet submittal requirements and deadline. The review committee will also rank the proposals and assign a level of risk, High, Medium or Low of noncompliance with Federal statutes and regulations based on factors such as, but not limited to:
  - (i) Subrecipient's prior experience with the same or similar subawards
  - (ii) Results of previous audits including whether or not the subrecipient receives a Single Audit and the extent to which the same or similar subaward has been audited as a major program
  - (iii) Whether subrecipient has new personnel or new or substantially changed systems
  - (iv) The extent and results of Federal awarding agency monitoring (e.g., if subrecipient also receives Federal awards directly from a Federal awarding agency).
- Risk Assessment Questionnaire Template

	Risk Criteria	Low 1 point	Medium 2 points	High 3 points	Score
1.	Experience with State or Federal Funds	0-3 years	3-5 years	5+ years	
	COMMENTS:				
2.	Experience with Specific Grant Program	0-3 years	3-5 years	5+ years	
	COMMENTS:				
3.	Management or staff turnover that affects this program	No turnover	Little turnover	Significant turnover	
	COMMENTS:				
4.	Experience of staff and management assigned to program	5+ years/ funding cycles	2-5 years/ funding cycles	Less than 2 years/ funding cycles	

	COMMENTS:				
5.	Complexity of business environment or program funding/matching requirements	Simple program requirements and operations environment	Moderately complex program requirements and operations	Complex operations environment and program requirements	
	COMMENTS:				
6.	Timeliness in document submission: Applications, Amendments, Finance Reports, budgets/Revisions, Close-out	On time – All documents	Rarely late	Consistently late	
	COMMENTS:				
7.	Dollar Value of Subaward	<\$500,000	\$500,001 to \$1,000,000	>\$1,000,001	
	COMMENTS:				
8	Effective written procedures and controls for the program	Formal/Written and Distributed to Staff	Informal Policies and Controls	No Policies or Controls	
	COMMENTS:				
9	Are there any Current or previous complaints or lawsuits filed within past three (3) years alleging discrimination on the basis of race, color or national origin (including Limited English Proficiency), sex, age, disability, retaliation or alleging retaliation.	No previous or current complaints or lawsuits	Has ___ number of previous lawsuit(s) and/or ___ complaints within past 3 years	Has ___ number of current lawsuit(s) or ___ number of complaints	
	COMMENTS:				
10	Is there a published nondiscrimination policy covering the entire organization, and includes in the provision of programs and activities to program beneficiaries (participants, customers, clients, public, etc.) and is there a statement prohibiting retaliation	Yes, published policy inclusive of organization and program beneficiaries and includes prohibition of retaliation	Has published nondiscrimination policy for organization but does not include provision for program beneficiaries	Does not have a published nondiscrimination policy	
	COMMENTS:				
11	Is there a financial management system in place to track and record program expenditures?	Has financial management system in place	N/A	No financial management system in place	
	COMMENTS:				

12	Does the accounting system identify the receipts and expenditures of program funds separately for each award?	System identifies receipts/ expenditures of program funds separately for each award	System identifies receipts/ expenditures of program funds but does not separate for each award	System does not identify receipts and expenditures of program funds	
	COMMENTS:				
13	Is there a time and accounting system to track time and expenditures by cost objective?	Yes, has time & accounting system to track time & expenditures by cost objective	Has time and accounting system but does not track time & expenditures by cost objective	No time and accounting system to track time and expenditures	
	COMMENTS:				
14	Variations between expenditures and budget	No variations	Small variations	Large and frequent variations	
	COMMENTS:				
15	Amount of budget carryover	No carryover	Small amount of carryover	Large amount of carryover	
	COMMENTS:				
16	Matching Requirements	Always meets matching requirements (no difficulty)	Meets match requirements most of time (some difficulty)	Consistently has difficulty meeting matching requirements	
	COMMENTS:				
17	Past Audit findings	No material findings	Some findings, not material	Has material findings	
	COMMENTS:				
18	Debarred or suspended? If so when?	Never debarred or suspended	n/a	Has been debarred or suspended	
	COMMENTS:				
19	Corrective Action Plans (CAP) and Resolution	No CAPS past or current	Has had CAPs but resolved on time	Has CAPs and not resolved on time	
	COMMENTS:				
20	Abbreviated Compliance Review findings	Compliant	n/a	Noncompliant	
	COMMENTS:				
21	Are there written policy and procedures to adequately administer Federal grant programs?	Yes, written policy and procedures	Has procedures not written	Does not have written policy/ procedures	
	COMMENTS:				
22	Is there a written conflict of interest policy consistent with 2 CFR 200.318 governing actions	Yes, has written conflict of interest consistent with	Has conflict of interest for employees only	Does not have a written conflict of interest	

	of employees and organizational conflicts of interest.	2 CFR 200.318	no organizational conflict of interest		
	COMMENTS:				
23	Is there written procurement policy and procedures	Yes, has written procurement policy	n/a	No written procurement policy and procedures	
	COMMENTS:				

### 3. Subrecipient Monitoring

Regular monitoring is conducted to ensure federal funds are spent in compliance with the applicable laws, regulations and provisions (e.g. 2 CFR 200 Subrecipient) and ensure performance goals are met. The active amount of monitoring will vary depending on the level of risk identified.

- Low Risk

Review audit reports on an annual basis to determine significance of audit findings and whether they pose an increased risk to the subrecipient's ability to maintain compliance and meet their responsibilities as defined in the Statement of Work. Review the subrecipient's invoices to insure that

- Work is performed within the project period (and any applicable budget periods)
- Invoices are complete and accurate
- Expenditures are allowable per subaward's budget
- Program manager has approved as acceptable for payment.

- Moderate Risk

Perform all review steps as listed in the "Low Risk" category in addition to the following:

- Request expenditure detail as supporting documentation for invoices on a monthly or quarterly basis
- Evaluate documentation received for sufficiency
- Request and review financial reports more frequently, if deemed necessary.

- High Risk

Perform all review steps as listed in the "Low Risk" and "Moderate Risk" categories in addition to the following:

- Request expenditure detail as supporting documentation for all invoices
- Maintain regular contact with subrecipient to ensure programmatic expectations are met. Document communication in Subaward files
- Exercise the option to audit or consider performing a site visit or desk review
- Withhold payments to Subrecipient if deemed necessary.

### ONGOING MONITORING

1. Invoices and supporting documentation is reviewed by programmatic and financial staff.

- Ensure costs claimed are allowable, reasonable, and allocable
- Are necessary and reasonable for the performance of both the subrecipient agreement and the Federal award
- Are allocated and consistent with the benefit received

- Meet the requirements of the Uniform Guidance and the Federal award
  - Are consistent with policies and procedures of the subrecipient
  - Are not used to meet cost sharing or matching requirements of any other federally financed program
  - Ordinary and necessary for operation or performance
  - Procurement method was followed or similar bids or quotes were obtained
  - Fall within the established practices and policies of the subrecipient
  - Goods or services involved can be assigned to a specific project or cost objective
  - Indirect Cost rates are calculated correctly (if applicable)
  - Costs are not charged to the project due to budget restrictions or limitations of other Federal awards
  - Represent actual costs and not budgeted or projected amounts
2. The subrecipient has proper written policies in place and follows them for:
- Financial Management
    - Federal awards are tracked separately and can be identified in the subrecipient's accounting records
    - Cash Management
  - Procurement policy
    - Ensure proper method of procurement utilized
  - Require quotes to ensure procurement policies are followed
  - Require debarment search results for purchases exceeding \$25,000
  - Track any equipment that costs over \$5,000
3. Provide training and technical assistance throughout the period of performance
- Educate subrecipients on grant guidelines and Uniform Guidance requirements
  - Review performance and financial reports
  - Ensure performance goals are being achieved
  - Ensure reports are submitted on time and in line with objectives
  - Ensure performance reports are complete and reasonable
  - Performance reports should include:
    - Comparison of actual accomplishments to the objectives established by the federal award
    - Reasons why established goals were not met
    - Explanations, if applicable, of high unit costs or cost overruns
    - Significant developments, problems, delays, and adverse conditions or favorable developments.
4. Award Closeout
- Review final expenses throughout the period of performance including any final required financial reports
  - Review required programmatic/performance/technical reports and ensure required objectives were achieved
  - Document the review of all required closeout documentation
  - Ensure final invoices have been received, processed, and paid
  - Ensure any funds required to be returned for overpayment or improper payments have been received
  - Ensure any issues or discrepancies with financial information are reconciled
  - Notify the subrecipient by mail or e-mail the project has been successfully completed

## **DESK REVIEW (offsite remote) INCLUDE BUT NOT LIMITED TO:**

1. Pre-Monitoring work
  - a. Obtain copies of items collected in ongoing monitoring, such as, vouchers, invoices, monthly reports and other back-up documentation for payments made to the subrecipient.
  - b. Review federal grant award notice, terms and conditions, programmatic requirements, and compliance supplement for any additional financial and programmatic requirements.
  - c. Review files/notes from prior monitoring.
  - d. Determine if program and financial monitoring will be done together or separately.
    - i. Staff should share information collected during ongoing monitoring
    - ii. Staff should communicate any special conditions or unique situations associated with the agreement
    - iii. Staff should determine which areas of monitoring each office will review.
  - e. Notify the subrecipient of the upcoming desk review
    - i. Inform the subrecipient they will be monitored remotely to satisfy the federal monitoring requirement. Communication can be done by mail or e-mail.
    - ii. City will send a form/questionnaire along with the notification for the subrecipient to complete in order to collect required data
    - iii. Data collected could include items such as:
      1. Definition from the subrecipient of their structure, identification of governing board and key personnel handling management and operational duties
      2. Copies of policies for programmatic and financial management
      3. Conflict of Interest policy
      4. Procurement policies
      5. Sample general ledger information
        - List of all transactions for the current agreement or invoicing period
        - Select sample transactions and review source documentation.
      6. Sample of time keeping records and methods of recording time across multiple federal awards
      8. Plan, data, or documentation on how the subrecipient is carrying out the program objectives of the agreement
      9. If they met the requirement for a single audit, review single audit information. If they didn't meet the requirement of a single audit, however obtained an independent audit or financial review, then review that information
      10. Budget development and monitoring process.
      11. Copies of equipment and inventory
        - Policy;
        - Inventory and Property records; and
        - Disposal records.
2. Monitoring Review of information collected
  - a. Collect all pre-visit data, copy of agreement, payments, and other documentation to be reviewed
  - b. Schedule a meeting to review the information submitted by the subrecipient in response to the request
  - c. Have an analysis tool or checklist for all staff members to make notes as the information from the subrecipient is reviewed
  - d. The tool or checklist could contain items such as:
    - i. Policies/procedures for the following areas:
      - Programmatic performance and method by which program objectives are measured

- e. Performance reports should include:
  - i. Comparison of actual accomplishments to the objectives established by the award
  - ii. The reasons why established goals were not met, if appropriate;
  - iii. Additional pertinent information, such as, analysis and explanation of cost overruns or high unit costs;
  - iv. Significant developments, problems, delays, or adverse conditions
  - v. Favorable developments.
- f. Review Eligibility
  - i. Were participants eligible under the applicable eligibility guidelines?
  - ii. Were participant benefits properly discontinued when the period of eligibility expired?
  - iii. Were program benefits calculated in accordance with program requirements?

## 2. Mandatory Written Policies/Procedures

- a. Conflict of Interest
- b. Accounting Policy / Cash Management
- c. Travel policy
- d. Procurement
  - i. Methods of Procurement
  - ii. Equipment definition, inventory, and disposition
- e. Time distribution records
- f. Internal controls
  - ii. Governing board members and meeting minutes.
  - iii. Key personnel performing duties and segregation of duties.
- iv. Audit information supplied.
- v. General ledger listing.
- vi. Sample of payable and receivable source documentation.
- vii. Time keeping records.
- viii. Determine if the conditions of the award are being met.
- g. City will follow up with the subrecipient following the meeting for:
  - i. Missing information originally requested;
  - ii. Additional items needed as a result of the review.

## 3. Final Analysis

- a. Upon completion of the desk review, City staff involved in the monitoring should:
  - i. Decide course of action to address any issues of non-compliance.
  - ii. Decide on additional monitoring, if needed.
  - iii. Develop a plan of action if additional monitoring is needed.
  - iv. Consider taking enforcement action
  - v. Management decisions may be issued for audit findings
- b. Send the subrecipient notice the monitoring has been completed.
  - i. Include corrective action plan for areas of noncompliance
  - ii. Include recommendations for areas where performance can be improved
  - iii. Communicate additional monitoring planned, if applicable.
- c. Assemble a monitoring file and compile all documentation for the monitoring visit

## **ONSITE REVIEW INCLUDE BUT NOT LIMITED TO:**

### 1. Pre-Visit work

- a. Obtain a copy of the subrecipient agreement on file.

- b. Obtain copies of items collected in ongoing monitoring, such as, vouchers, invoices, monthly reports, and other back-up documentation for payments made to the subrecipient.
- c. Review federal grant award notice, terms and conditions, programmatic requirements and compliance supplement for any additional financial and programmatic requirements.
- d. Review files/notes from prior monitoring.
- e. Review the Risk Assessment completed prior to the agreement.
- f. Determine if program and financial monitoring will be done together or separately.
  - i. Staff will share information collected in ongoing monitoring.
  - ii. Staff will communicate any special conditions or unique situations associated with the agreement.
  - iii. Staff will determine which areas of the monitoring each office will review.
- g. Notify the subrecipient of the upcoming monitoring visit.
  - i. The City will inform the subrecipient they will be onsite for the visit at the subrecipient's location. Communication can be done by mail or e-mail.
  - ii. The City will provide some dates for the subrecipient to select which one best fits their schedule.
  - iii. The City will send a form/questionnaire along with the notification for the subrecipient to complete in order to collect some data before the visit.
- iv. Data collected pre-visit could include items such as:
  - Definition from the subrecipient of their structure, identification of governing board and key personnel handling management and operational duties.
  - Copies of policies for programmatic and financial management
  - Conflict of Interest policy
  - Procurement policies
  - Sample general ledger information.
    - a. Detail list of all transactions for the current agreement or invoicing period.
    - b. Select sample transactions and review source documentation.
  - Sample of time keeping records and methods of recording time
  - Plan, data, or documentation on how the subrecipient is carrying out the program objectives of the agreement
- h. Review Eligibility records
  - i. Were participants eligible under the applicable eligibility guidelines?
  - ii. Were participant benefits properly discontinued when the period of eligibility expired?
  - iii. Were program benefits calculated in accordance with program requirements?
    - If they met the requirement for a single audit and provide single audit information. If they didn't meet the requirement and had a financial review done, provide copies of that review.
    - Obtain copy of travel policy
    - Internal controls for the award
    - Budget development and monitoring process.
    - Equipment and Inventory
      - a. Policy;
      - b. Inventory and Property records; and
      - c. Disposal records.
- i. Have an internal meeting of staff who will be at the visit to review data collected previsit and plan the visit.
- j. Request any information needed from the subrecipient that was missing from their original submission, or any new information as a result of the review meeting.

- k. Prepare a set of interview questions to ask about program and financial management of federal grants, as well as, touch on the areas in the pre-visit data collected requiring additional explanation.

## 2. Monitoring Visit

- a. Schedule meeting with the subrecipient.
- b. Bring along all pre-visit data, copies of contracts, payments, and other documentation needed.
- c. Have the set of interview questions prepared to cover financial and programmatic areas of the agreement that could include:
  - i. Discuss the uniform guidance requirements of programmatic and financial performance.
  - ii. Discuss budget development and oversight.
  - iii. Interview key personnel about the segregation of duties, internal control procedures, and conflict of interest.
  - iv. Discuss answers provided by the subrecipient in the pre-visit data collection and clarification or additional explanation of areas that were unclear.
  - v. Discuss travel policy, reimbursement process, and limits on per diem and lodging.
  - vi. Discuss procurement policies, inventory procedures, equipment leases, and handling of capital assets.
  - vii. Discuss programmatic performance and how objectives are developed and monitored to ensure they are being met.
  - viii. Discuss areas with the subrecipient that could be deemed as high risk and ask them their plan to mitigate risk.
  - ix. Discuss special conditions of the award and any situations unique to the federal funding.
  - x. Offer best practices to improve the subrecipient's performance or financial management.
  - xi. Offer guidance and solutions to issues of non-compliance with federal requirements or the terms and conditions of the subrecipient agreement.
  - xii. Request additional documentation or follow-up, if needed, to complete the review.

## 3. Post monitoring work

- a. Collect any documentation or follow-up information that was requested at the onsite visit.
- b. City staff involved in the visit should have a post monitoring meeting to review all documentation and ensure all areas of the review were covered. They should also:
  - i. Decide course of action to address any issues of non-compliance;
  - ii. Decide on additional monitoring, if needed;
  - iii. Develop a plan of action if additional monitoring is needed;
  - iv. Consider taking enforcement action
  - v. Management decisions may be issued for audit findings
- c. Send the subrecipient notice the monitoring has been completed.
  - i. Include corrective action plan for areas of noncompliance;
  - ii. Include recommendations for areas where performance can be improved; and
  - iii. Communicate additional monitoring planned, if applicable.
- d. Assemble a monitoring file and compile all documentation for the monitoring visit and retain

#### **4. Remedies for Noncompliance**

A subrecipient's failure to comply with Federal statutes, regulations or the terms and conditions of a Federal award may require adjustment of specific award conditions as needed may include items such as the following:

- Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within given performance period
- Requiring additional, more detailed financial reports
- Requiring the subrecipient to obtain technical or management assistance
- Establishing additional prior approvals

If additional requirements are imposed notification of the following will be provided:

- The nature of additional requirements
- Reason for additional requirements
- Actions needed to remove additional requirement(s), if applicable
- Time allowed to complete actions if applicable
- Method for requesting reconsideration of the additional requirements imposed

If the aforementioned additional conditions do not remedy noncompliance then the following actions, as appropriate in the circumstances, are as follows:

- Temporarily withhold cash payments pending correction of deficiency
- Disallow (use of funds or applicable matching credit) all or part of the cost of the activity or action not in compliance
- Terminate, in whole or part, the Federal award funding
- Recommend the Federal awarding agency to initiate suspension or debarment proceedings as authorized under 2 CFR part 180
- Withhold further awards for the project/program
- Take other remedies that may be legally available