

June 2018

# Housing for New Hope – Rapid Re-Housing Performance Audit



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**Date:** June 26, 2018  
**To:** Audit Services Oversight Committee  
**From:** Germaine Brewington, Director of Audit Services  
**Subject:** Rapid Re-Housing Performance Audit June 2018

The Audit Services Department staff completed the report for the Housing for New Hope—Rapid Re-Housing Performance Audit. The purposes of this audit were to:

- Determine if adequate controls existed at the Department of Community Development to monitor activities carried out by Housing for New Hope specifically relating to the Rapid Re-Housing Program; and
- Determine if Housing for New Hope had adequate internal controls over the management of the Rapid Re-Housing Program.

This report presents the observations, results, and recommendations of the Housing for New Hope—Rapid Re-Housing Performance Audit. In response to this audit's recommendations, City Management concur with the recommendations made. The detailed Management Response to the recommendations is included with the attached report.

The Department of Audit Services staff would like to acknowledge the contributions of the staff from the Department of Community Development and Housing for New Hope in the completion of this audit.

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# Audit Report Highlights

## Background

The Department of Community Development is responsible for coordinating the City's community development and neighborhood stabilization and revitalization efforts including: 1) financial empowerment and home retention, 2) affordable housing, and 3) homelessness services programs. The City uses Emergency Solutions Grant (ESG) funds and Dedicated Housing funds (DHF) to support homelessness service programs. The City Council awarded a total of \$309,554 to Housing for New Hope, Inc. (HNH) for the period of March 1, 2017 to Feb 28, 2018 for this program.

## Purpose

The purposes of the audit were to:

1. Determine if adequate controls existed at the Department of Community Development to monitor activities carried out by Housing for New Hope specifically relating to the Rapid Re-Housing Program.
2. Determine if Housing for New Hope has adequate internal controls over the management of the Rapid Re-Housing Program.

## Why this audit was performed

This audit was performed to determine if controls were adequate to facilitate meeting outcomes around mitigating homelessness for the identified population.

## Highlights

Overall the Department of Community Development staff have adequate controls to monitor activities carried out by Housing For New Hope specifically related to the Rapid Re-Housing Program. A policy exists to provide guidance to Community Development Department staff on sub-recipient monitoring. Audit Services staff reviewed evidence to support the monitoring efforts for the contract. Appropriate documentation existed to support the adequacy of management's monitoring efforts. The City uses Emergency Solutions Grant (ESG) funds and Dedicated Housing funds (DHF) to support homelessness services programs. The City Council awarded a total of \$309,554; ESG (109,554) and City General Fund (\$200,000) to Housing for New Hope, Inc. (HNH) for the period of March 1, 2017 to Feb 28, 2018 to support this program.

Audit Services staff examined 20 client files and verified that eligibility was met and case management services were documented. No exceptions were noted.

# Audit Services Department

## Internal Audit

The Audit Services Department serves a three-fold role at the City of Durham. Our number one goal is to provide independent, objective assurance that City processes are working effectively. Secondly, we serve as internal fraud examiners when fraud, waste, or abuse is alleged against a City employee or department. Finally, in order to constantly foster high ethical standards, we provide in-depth ethical training to all City employees on a rolling basis. To learn more, visit our CODI site or our page on the [City of Durham's website](#).

## Audit Services Oversight Committee

In order to maintain its organizational independence, the Audit Services Department reports to the Audit Services Oversight Committee (ASOC) a minimum of four times a year. The ASOC approves all proposed audit plans and completed audits prepared by Audit Services staff.

The Audit Services Oversight Committee is made up of six members: two City Council Members, three resident members, and one alternate City Council Member. The current members include two certified public accountants and persons with business experience. The City Manager is an ex-officio, non-voting member of the ASOC.

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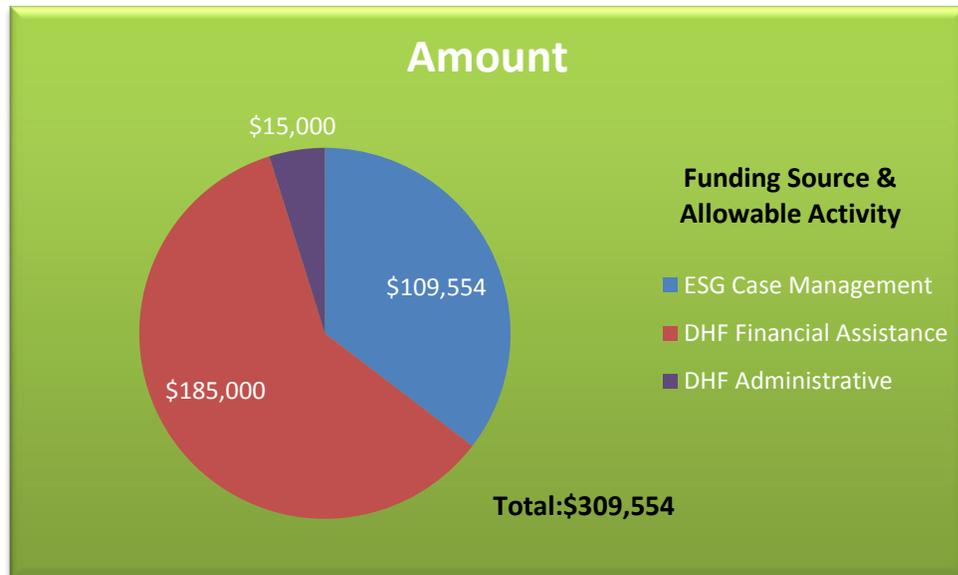
Thomas J. Bonfield  
*City Manager*

## Background

The Department of Community Development is responsible for coordinating the City's community development and neighborhood stabilization and revitalization efforts including: 1) financial empowerment and home retention, 2) affordable housing, and 3) homelessness services programs.

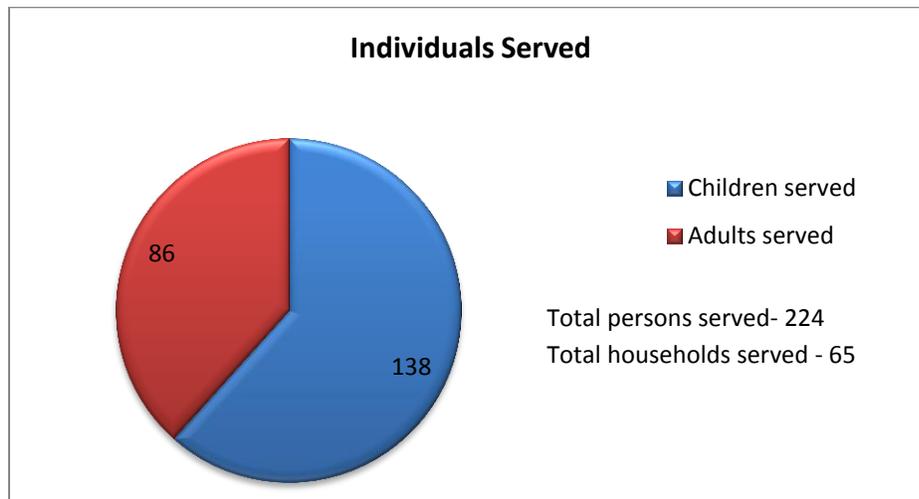
The City uses Emergency Solutions Grant (ESG) funds and Dedicated Housing funds (DHF) to support homelessness services programs. The City Council awarded to Housing for New Hope, Inc. (HNN) for the period of March 1, 2017 to Feb 28, 2018, a total of \$309,554; consisting of \$109,554 from ESG and \$200,000 from the City's General Fund. Graph 1 below shows the allowable activities the funds must be spent on:

Graph 1: Allowable activities



Graph 2 below shows the individuals served using ESG and DHF funds that were provided to Housing for New Hope by the City of Durham:

Graph 2: Individuals served with City and ESG funds



### **Housing for New Hope**

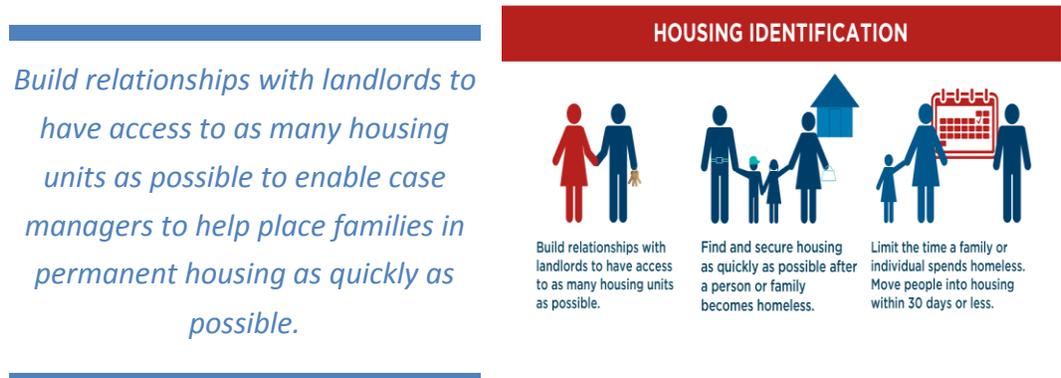
HNH is a 501 (c) (3) non-profit organization that aims to end homelessness via a collaborative effort with other agencies in the City of Durham. Housing for New Hope sees the individual or family as a unique unit with specific personal hardships that need addressing. The agency strives to empower clients and assist them in finding and maintaining housing. HNH uses the ESG and City funds to supplement their Rapid Re-Housing Program.

### **Rapid Re-Housing Program**

A housing first approach undergirds the City of Durham’s response to its homeless crisis issue of which rapid re-housing is a critical component. A key mission of the Rapid Re-Housing Program in Durham is to reduce the amount of time a person is homeless. Rapid re-housing connects families and individuals experiencing homelessness to permanent housing. Each family or individual is assigned a case manager who tailors assistance to the client using resources including time-limited financial assistance and targeted supportive services. Rapid re-housing programs help families and individuals living on the streets or in emergency shelters work through their barriers to obtaining permanent housing thus: 1) reducing the amount of time they experience homelessness, 2)

helping them avoid returning to homelessness; and 3) connecting them with partner organizations to make them aware of community resources that can enable them to achieve housing stability in the long-term. There are three components of the Rapid-Housing Program. See Figure 1: Housing Identification.

Figure 1  
Core Component #1: Housing Identification



National Alliance to End Homelessness. (2018). *Rapid re-housing works*. Retrieved from: <https://endhomelessness.org/rapid-re-housing-works/>.

The goal of housing identification is to find housing for people quickly. Housing identification services encompass helping households find appropriate rental housing in the community, contacting and recruiting landlords to provide housing opportunities for individuals and families experiencing homelessness, addressing potential barriers to landlord participation such as the concern about the short-term nature of rental assistance and tenant qualification; assisting households to complete applications and prepare for interviews with landlords; helping households to determine if a housing option meets their needs and preferences. This can be a challenging task, especially in high-cost, low vacancy markets. Programs have to recruit landlords continuously. The more partnerships that exist, the greater the opportunity to rapidly house clients when the need arises.

See Figure 2: Rent and Move-In Assistance.

Figure 2  
Core Component # 2: Rent and Move-In Assistance



National Alliance to End Homelessness. (2018). *Rapid re-housing works*. Retrieved from: <https://endhomelessness.org/rapid-re-housing-works/>.

The primary barrier to permanent housing for many families experiencing homelessness is their limited finances. To address this barrier, rapid re-housing programs offer financial assistance to cover move-in costs, deposits, and the rental and/or utility assistance necessary to allow individuals and families to transition immediately out of homelessness and become stabilized in permanent housing. The amount and duration of the assistance varies, but at a minimum, it should be enough to help the clients secure a place to live.

See Figure 3 below: Case Management

Figure 3  
Core Component # 3: Case Management



National Alliance to End Homelessness. (2018). *Rapid re-housing works*. Retrieved from: <https://endhomelessness.org/rapid-re-housing-works/>.

Case management services may be provided to households to help the family members overcome and troubleshoot barriers to (re)acquiring and maintaining permanent housing. Case management services in rapid re-housing programs can help individuals and families select among various permanent housing options based on their unique needs, preferences, and financial resources. The City's Rapid Re-Housing Program does just that. In addition, staff at Housing for New Hope help families and individuals address barriers to housing (such as credit history, rent arrearages, and legal issues), negotiate manageable and appropriate lease agreements with landlords, and make appropriate and time-limited services and support available to families and individuals—and to the landlords who are partnering with the City's Rapid Re-Housing Program. Case management services can also monitor participants' housing stability after securing housing and during program participation, ideally through home visits and communication with the landlord. They can also be available to resolve housing-related crises should they occur. The goal of rapid re-housing case management is to help stabilize people once housed, by connecting them to services and support if needed.

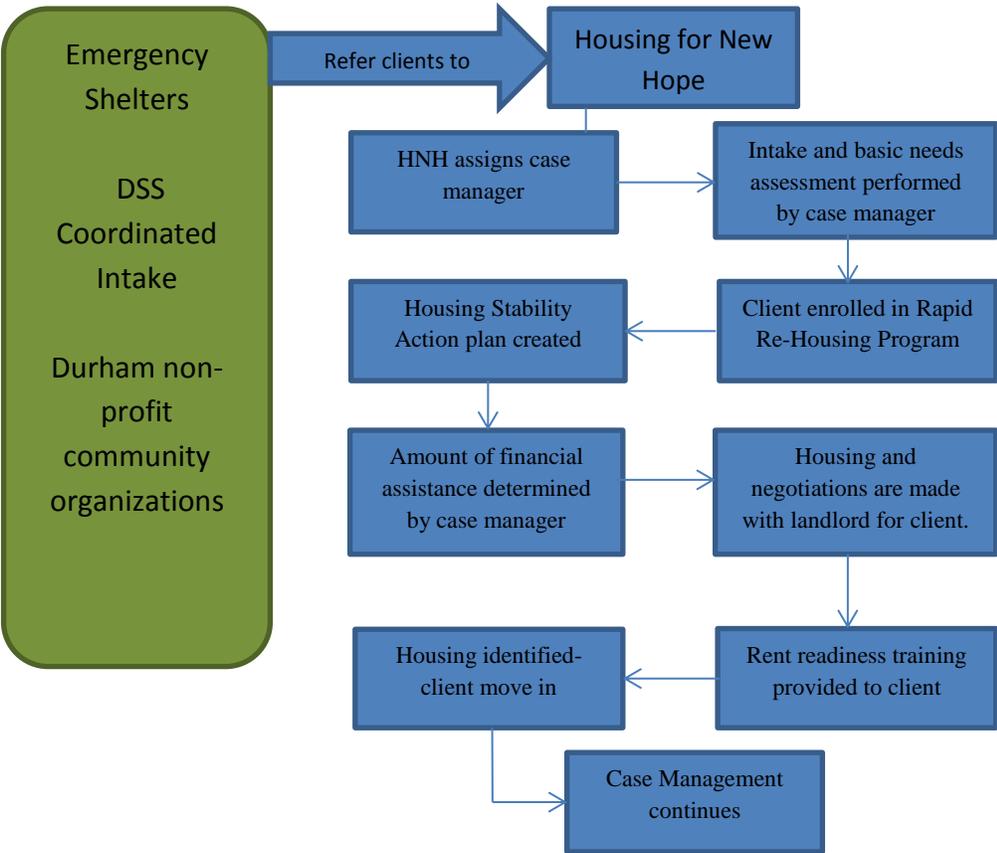
National Alliance to End Homelessness. (2018). *Rapid re-housing works*. Retrieved from: <https://endhomelessness.org/rapid-re-housing-works/>.

### **Rapid Re-Housing Program at Housing for New Hope**

The City of Durham utilizes a Coordinated Entry System. Coordinated Entry is a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed, referred, and connected to housing and assistance based on their strengths and needs. Clients in need are directed to contact the Department of Social Services. The Department of Social Services staff utilize the Homeless Management Information System (HMIS) to capture client information. The Department of Social Services staff determine if crises can be met with DHHS resources. If needs are such that they cannot accommodate the client, a referral is made to the Homeless Division Case Manager at Urban Ministries. Clients are housed in emergency shelters or placed on a waiting list for shelter. The emergency shelters administer the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) that is used to capture acuity of an individual or

family to assist in determining eligibility for the Rapid Re-Housing program. Monthly meetings are held with representatives from Housing for New Hope, Urban Ministries, and Families Moving Forward, as well as other organizations. Determination is made on how to prioritize client needs against what is available. Referrals are made to Housing for New Hope if clients are eligible for the Rapid Re-Housing Program. Housing for New Hope staff perform intake and provide housing identification, rent, move-in assistance and case management. See Figure 4 below for a flowchart of the process:

Figure 4



## Objectives

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The objectives of the audit were to:

- Determine if adequate controls existed at the Department of Community Development to monitor activities carried out by Housing for New Hope specifically relating to the Rapid Re-Housing Program; and
- Determine if Housing for New Hope has adequate internal controls over the management of the Rapid Re-Housing Program.

## Scope, Methodology, and Compliance

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### Scope

The scope of the audit included examining the Housing for New Hope contract for the period March 1, 2017 to February 28, 2018 and also reviewing current practices as it related to administering the Rapid Re-Housing Program. The scope of the audit was limited to City of Durham funds provided to Housing for New Hope.

### Methodology

Audit Services Department staff performed the following procedures to accomplish the objectives of the audit:

- Interviewed staff responsible for monitoring Housing for New Hope activities at the Department of Community Development;
- Inquired about controls in place to monitor the contract with Housing for New Hope;
- Reviewed executed contract documents between the City and Housing for New Hope to identify terms and conditions that the contractor should have complied with;
- Documented and verified processes used by Community Development staff to ensure contractors complied with terms and conditions of the contract;

- Verified documentation to validate performance monitoring performed by department staff (site visits, review of reports, status updates, etc.);
- Verified internal contract monitoring through reports, performance measures, management information on contracting activities and performance;
- Reviewed the payment approval process;
- Selected a sample of payments and verified:
  - a. Approvals;
  - b. Supporting documentation; and
  - c. The propriety of payments per the contract requirements;
- Interviewed staff responsible for administering the Rapid Re-Housing Program at Housing for New Hope;
- Interviewed clients that received assistance from Housing for New Hope;
- Reviewed 20 client files and verified that documentation existed to support the:
  - a. Client eligibility;
  - b. Verification of homelessness;
  - c. Rent Reasonableness comparison;
  - d. Housing Assistance Payment (HAP) agreement;
  - e. Housing Inspection Certificate;
  - f. Lead Based Paint Screening Worksheet;
  - g. Lease Agreement;
  - h. VI-SPDAT assessment;
  - i. Duration and amount of assistance provided;
  - j. Amount paid was in accordance with the assessment of financial assistance provided; and
- Reviewed information on clients served using City funds.

During the audit, Audit Services Department staff also maintained awareness to the potential existence of fraud.

## **Compliance**

Audit Services staff conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that Audit Services staff plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objectives. Audit Services staff believe that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

### Objective 1 Results Summary

TO DETERMINE IF ADEQUATE CONTROLS EXISTED AT THE DEPARTMENT OF COMMUNITY DEVELOPMENT TO MONITOR ACTIVITIES CARRIED OUT BY HOUSING FOR NEW HOPE SPECIFICALLY RELATING TO RAPID RE-HOUSING.

Overall the Department of Community Development staff have adequate controls to monitor activities carried out by Housing For New Hope specifically related to the Rapid Re-Housing Program. A policy existed to provide guidance to Community Development Department staff on sub recipient monitoring. Audit Services staff reviewed evidence to support the monitoring efforts for the contract. Appropriate documentation existed to support the adequacy of management's monitoring efforts. Community Development staff performed site visits and reviewed documentation to support eligibility for clients served using City awarded funds. Audit Services staff verified a sample of payment requests for proper approval of payments and reviewed the adequacy of documents to support payment requests. No exceptions were noted. An area for enhancement was identified.

### Area for Enhancement 1

#### **Audit Services staff found:**

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*A process did not exist to evaluate and interpret performance measurement results and identify actions to improve results.*

Performance improvement is a cycle that involves setting goals, evaluating and implementing a plan after using benchmarks to determine program effectiveness. Staff should use resultant information to create a performance improvement plan. Once the plan is actionable, staff should continue to evaluate and improve the plan once implemented. Performance measures were established by the Department of Community Development staff to monitor outcomes for funds awarded to Housing for New Hope. Housing for New Hope was required to report on 15 performance measures. Targets were not met for three of the 15 measures. Evidence did not exist to support actions taken by the Community Development staff to address underlying conditions that lead to Housing for New Hope not meeting established targets. Targets were not revised nor were action plans created to ensure targets would be met subsequently. The performance measures follow.

**100% of households will be identified and referred using the Homeless Services Advisory Committee’s Adopted Prioritization Policy and the Associated with Adopted by Name List Processes.**

Only 84% of households were identified using the Homeless Services Advisory Committee’s Adopted Prioritization Policy and the Associated with Adopted by Name List Processes. Per Housing for New Hope staff, they prioritized 28 of 33 households, using the By-Name List (consisting of homeless households staying at local emergency shelters) managed by the Department of Community Development staff. Five (5) households where residents were verified homeless had completed the coordinated intake process and were referred by other nonprofit community partners.



84%



**90% of households served will have a state of North Carolina issued driver’s license or identification card with a Durham County address with an issued date no less than six months prior to program entry.**

Only 70% of households served met this criterion. According to Housing for New Hope staff, their success on this measure has been less than anticipated due to inconsistent application of residency requirements for recent homeless individuals. This is a system issue as emergency shelters accept individuals regardless of how long they have lived in Durham. This practice impacts the Rapid Re-Housing Program’s ability to deny service to households that have not lived in Durham for a minimum of six (6) months. To deny service due to a household’s length of time in Durham is in conflict with the Housing First Philosophy. [The Housing First Philosophy is grounded in the belief that above all else, homelessness is a crisis best responded to by providing housing as quickly as possible to those in need.]



70%



**100% of households served will have a date entered housing that is 30 days or less from the program entry date.**

Only 52% of households served had an entry date for housing that was 30 days or less. According to Housing for New Hope staff, the average length of time between program entry date and move in date for their re-housing program is 43 days. The Rapid Re-Housing program staff increasingly work with households with multiple barriers to housing— such as zero or low income, poor



52%



work history, multiple evictions, criminal background, and large family size. In direct conflict with the Housing First Philosophy, most property management companies and private landlords are unwilling to lease to a household that does not demonstrate sufficient income upon entry. In order to achieve the housing goal of 30 days or less, the program would have to commit to providing a longer term of financial support to clients which would drastically reduce the number of clients they serve annually.

## **Objective 2 Results Summary**

DETERMINE IF HOUSING FOR NEW HOPE HAS ADEQUATE INTERNAL CONTROLS OVER THE MANAGEMENT OF THE RAPID RE-HOUSING PROGRAM.

Overall, Housing for New Hope is complying with the requirements of the contract with the City of Durham and expending funds in accordance with ESG guidelines. Assistance was provided to only eligible clients per ESG guidelines and funds were expended for eligible activities. Audit Services staff examined 20 client files and verified that eligibility was met and case management services were documented. No exceptions were noted. In addition, a Housing Inspection Certificate was also present in each file. Client files were well organized and contained all relevant information.

## **Area for Enhancement 2**

### **Audit Services staff found:**

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*Documentation did not exist to support changes made to the initial assessment of financial assistance.*

The appropriate level of financial assistance and/or housing relocation and stabilization services should be based on a participant's specific needs. Recipients or sub recipients must assess a household's need at initial assessment to establish the amount and types of assistance needed to obtain housing, and at the reevaluation phase to establish the amount and types of assistance needed for retaining housing. While a household may have been approved for a full or deep subsidy during the original intake, it is important for case managers to determine during each recertification if circumstances have changed and how much assistance a household actually needs to be stabilized at that point.

Assistance levels can be adjusted at that time to be more or less than the original financial assistance. Upon review of client files it was noted that in some instances initial determination of the assistance to be provided was carried out and it stated that they would reevaluate the assistance amount after a specified period of time. Documentation did not exist to support changes in financial assistance after the initial assessment. Documentation should exist to support any changes. Since, the determination of financial assistance is at the discretion of the case manager, justifications for changes should be documented in writing for transparency of contract compliance and examination by third party reviewers. Currently, per Housing for New Hope staff, clients are notified verbally of the change to assistance.

### **Area for Enhancement 3**

#### **Audit Services staff found:**

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*The agreement between Housing for New Hope and the landlord is not filled out accurately*

Housing for New Hope staff work with clients and landlords to secure housing units for the clients enrolled in the Rapid Re-Housing Program. Housing for New Hope enters into a Rental Assistance Agreement with the owner/landlord. The purpose of the agreement is to assist the tenant identified in the agreement to lease and maintain a lease from the landlord in a safe and sanitary dwelling unit. It also notifies the landlord/owner that Housing for New Hope will make ESG rapid re-housing or homelessness prevention rental assistance payments to the owner/landlord on behalf of the tenant in accordance with the agreement. These agreements were present in all the files reviewed. However, they were not completed correctly. For example, the amount of rental assistance payments to be provided by Housing for New Hope to the landlord was not stated correctly. In addition, the portion of rent payable by the tenant to the owner/landlord was also not stated correctly. Since these are legally binding agreements it is important to complete the agreements accurately to ensure the total amounts due the landlord are clearly defined. Inadequate staff training may have contributed to the agreements not being completed correctly.

## Conclusion

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Overall the Department of Community Development staff have adequate controls to monitor activities carried out by Housing for New Hope specifically related to the Rapid Re-Housing Program. A policy existed to provide guidance to Community Development Department staff on sub recipient monitoring. Audit Services staff reviewed evidence to support the monitoring efforts for the contract. Appropriate documentation existed to support the adequacy of management's monitoring efforts. An area for enhancement was noted. A process did not exist to evaluate and interpret performance measurement results and identify actions to improve results. Performance measures were established by the Department of Community Development staff to monitor outcomes for funds awarded to Housing for New Hope. Housing for New Hope was required to report on 15 performance measures. Targets were not met for 3 of the 15 measures. Evidence did not exist to support actions taken by the Community Development staff to address underlying conditions that lead to Housing for New Hope not meeting established targets. Targets were not revised or action plans were not created to ensure targets would be met subsequently.

In addition, Housing for New Hope is complying with the requirements of the contract with the City of Durham and expending funds in accordance with ESG guidelines. Assistance was provided to only eligible clients per ESG guidelines and funds were expended for eligible activities. Audit staff examined 20 client files and verified that eligibility was met and case management services were documented. No exceptions were noted. Housing Inspection Certificates were also present in each file. Client files were well organized and contained all the relevant information. A few areas for enhancement were noted:

- 1) Documentation did not exist to support changes made to initial assessment of financial assistance. The appropriate level of financial assistance and/or housing relocation and stabilization services should be based on a participant's specific needs. Assistance levels can be adjusted at that time to be more or less than the original financial

assistance. Documentation should exist to support the change. Since the determination of financial assistance is at the discretion of the case manager, justifications for changes should be documented in writing for transparency of contract compliance and examination by third party reviewers.

- 2) The agreement between Housing for New Hope and the landlord is not filled out accurately. Since these are legally binding agreements it is important to complete the agreements correctly. Housing for New Hope enters into a Rental Assistance Agreement with the owner/landlord. The purpose of the agreement is to assist the tenant identified in the agreement to lease and maintain a lease in a safe and sanitary dwelling unit from the landlord. It also notifies the landlord/owner that Housing for New Hope will make ESG rapid re-housing or homelessness prevention rental assistance payments to the owner/landlord on behalf of the tenant in accordance with the agreement. These agreements were present in all the files reviewed. However, they were not completed correctly.

## Recommendation 1

The Department of Community Development staff should evaluate and interpret performance measurement results and identify actions to improve results.

**Value Added:** *Risk Reduction, Efficiency*

## Recommendation 2

The Department of Community Development staff should require Housing for New Hope staff to document reasons for changes to financial assistance provided to clients. The documentation could be part of case management notes or a form could be created to capture any changes to financial assistance. Further, the landlord should also be notified of the changes or the initial Rental Assistance Agreement should be amended to include the change in assistance.

**Value Added:** *Risk Reduction*

## Recommendation 3

The Department of Community Development staff should review the Rental Assistance Agreement with Housing for New Hope staff and determine if it needs to be revised. If revisions are not made to the document, Housing for New Hope staff should be trained to ensure that the current Rental Assistance Agreements are completed accurately.

**Value Added:** *Risk Reduction*

### Value Added Legend



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## Management Response

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**Date:** August 21, 2018

**To:** Dr. Germaine F. Brewington, Director of Audit Services  
**Through:** Keith Chadwell, Deputy City Manager  
**From:** Reginald J. Johnson, Director  
**Subject:** Management's Response to Recommendations  
Performance Audit June 2018

The following is the management's response to the Housing for New Hope – Rapid Re-Housing Audit June 2018.

**Recommendation 1:** The Department of Community Development (DCD) staff should evaluate and interpret performance measurement results and identify actions to improve results.

**Management's Response:**

In response to the draft recommendations, the Department noted that DCD staff had reviewed prior contract performance information with Housing for New Hope staff during the process of preparing a new contract in early 2018 (Matt Walker E-mail to Sonal Patel 7-10-18). However, the Department recognizes that an annual review is not sufficient and concurs with the need to review and provide feedback on performance results more frequently during the contract period.

*Effective date:* 9/1/18

*Responsible staff:* Matt Walker, Senior Project Manager

**Recommendation 2:** The Department of Community Development staff should require Housing for New Hope staff to document reasons for changes to financial assistance provided to clients. The documentation could be part of case management notes or a form could be created to capture any changes to financial assistance. Further, the landlord should also be notified of the changes or the initial Rental Assistance Agreement should be amended to include the change in assistance.

**Management's Response:**

DCD concurs. Housing for New Hope has already responded to this recommendation by requiring all financial changes be documented in case management notes. Additionally, landlords will be notified as necessary. The Department will verify that these policies are being implemented consistently during regular monitoring.

*Effective date:* 9/1/18

*Responsible staff:* Matt Walker, Senior Project Manager

**Recommendation 3:** The Department of Community Development staff should review the Rental Assistance agreement with Housing for New Hope staff and determine if it needs to be revised. If revisions are not made to the document, Housing for New Hope staff should be trained to ensure that Rental Assistance agreements are completed accurately.

**Management's Response:**

DCD concurs.

*Effective date:* 10/1/18

*Responsible staff:* Matt Walker, Senior Project Manager

## Distribution of Report

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**Kim Anglin, CPA, Chair**

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