

RESOLUTION 49(23)

RESOLUTION APPROVING THE FEBRUARY 2023 COMMUNITY DEVELOPMENT BLOCK GRANT-DISASTER RECOVERY INTERNAL AUDIT REPORT

WHEREAS, the City has hired Weaver and Tidwell, LLP to complete an internal audit for the Community Development Block Grant-Disaster Recovery

WHEREAS, Weaver and Tidwell, LLP has provided an internal audit report for the months of July 2022 through February 2023 and the City has responded and prepared a course of action

NOW, THEREFORE, BE IT RESOLVED, by the Mayor and City Council of the City of Moore, Oklahoma, as follows:

ADOPTED, this 17th Day of April 2023, at a regularly scheduled meeting of the governing body in compliance with the Open Meeting Act, 25 O.S. SS301-314 (2001).

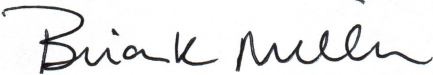

VANESSA KEMP, CITY CLERK



GLENN LEWIS, MAYOR

Adam Webb, Vice Mayor

Approved as to form and legality this 17th day of April, 2023.


BRIAN MILLER, CITY ATTORNEY

City of Moore, Oklahoma

Plaza Towers Water Line Replacement Project

February 8, 2023

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Kahley Gilbert
Projects Grant Manager
City of Moore, Oklahoma
301 N. Broadway
Moore, OK 73160-5130

This report presents the results of the Internal Audit procedures performed for the City of Moore, Oklahoma's CDBG-DR Plaza Towers Water Line Project from August 31, 2022 to February 8, 2023, relating to the Housing and Urban Development (HUD) Community Development Block Grant - Disaster Recovery (CDBG-DR) program funding the City of Moore (City) received for the period of December 21, 2015 to September 16, 2022.

The objectives of the Internal Audit performed were as follows:

- A. Review and evaluate the City of Moore Policies and Procedures to verify compliance with CDBG-DR requirements for the project.
- B. Review and verify that internal controls, policies and procedures, and applicable CDBG-DR, city, and state requirements were followed for the project, including initiation to closeout procedures.
- C. Evaluate a sample of transactions from the project and test against the criteria to ensure the processes and procedures were performed according to applicable CDBG-DR, city, and state requirements.

To accomplish these objectives, we conducted interviews with select City of Moore employees and reviewed specific process level and project transaction documentation. In addition, we tested specific project transactions against supporting documentation, verified compliance with applicable CDBG-DR, City, and State policies and procedures, verified actual expenditures were within the approved project budget, and reported within the appropriate period.

The procedures were performed based on general guidelines provided by HUD CDBG-DR, the City of Moore, and State of Oklahoma. We were not engaged to, and did not perform an audit, in which the objective would be the expression of an opinion. Accordingly, we do not express such an opinion.

This report is intended solely for the use of the City of Moore and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes. The following report summarizes the procedures performed, observations and findings.

Weaver and Tidwell, L.L.P.

Weaver and Tidwell, L.L.P.
Houston, Texas
February 8, 2023

Weaver and Tidwell, L.L.P.
4400 Post Oak Parkway, Suite 1100 | Houston, Texas 77027
Main: 713.850.8787

CPAs AND ADVISORS | WEAVER.COM

City of Moore, Oklahoma

Plaza Towers Water Line Project Review

HUD CDBG-DR

February 8, 2023

Summary and Background

In May of 2013 the City of Moore Oklahoma was hit by a mile wide F-5 Tornado and experienced winds up to 200 MPH, resulting in the loss of 24 citizens, 2 schools, a school administration building, a regional hospital, 90 businesses and 2,400 housing units being damaged or completely destroyed. In January 2013 Congress passed, and the President signed into law, The Disaster Relief Appropriations Act, also known as Public Law 113-2 (the "Act"), which appropriated approximately \$50 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act, as well as disasters occurring in the remaining months of Fiscal Year 2013. Of those funds, approximately \$16 billion was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG-DR Program"), to be administered by the United States Department of Housing and Urban Development ("HUD"). The Moore tornado and other tornadoes affecting Oklahoma during the period April 19th through May 31st, 2013 were included by HUD in the allocation created by the Act. The City's total HUD CDBG-DR funding received equals \$52.2 million, which are subject to federal compliance requirements based on the approved Action Plan and allocated for infrastructure, housing, and public service projects.

The Plaza Towers Water Line Replacement Project included the replacement of the water lines in the Plaza Towers Neighborhood of Moore, Oklahoma. The water lines that were replaced run along SW 5th to Penn Lane, then from Penn Lane to SW 11th Street. Also, the water lines that run along Newport Avenue and SW 10th Street were replaced. The water lines that were replaced are 3,750 feet in length and eight inches in size. The purpose of the project was to replace the water lines due to the lines reaching their age for maximum efficiency and were damaged by debris from the 2013 tornado.

Scope and Objectives

The scope of this internal audit focused on the City of Moore, Oklahoma's coverage of the existing and applicable policies and procedures for CDBG-DR compliance and the Plaza Towers Water Line Replacement Project. We evaluated the processes and procedures performed from initiation to close out of the project along with compliance with relevant CDBG-DR requirements. The following are the areas that were evaluated as part of the internal audit:

- Policies and Procedures
- Procurement Requirements, including solicitation, selection, and contracting.
- Monitoring and Managing Progress and Compliance for all applicable CDBG – DR requirements
- Project Closeout and Completion

The objectives of our procedures are as follows:

- A. Review and evaluation of the City of Moore Policies and Procedures to verify compliance with CDBG-DR requirements applicable for the project, including the following:
 - Financial Management
 - Internal Controls
 - Payment and Financial Reporting
 - Improper Payments
 - Program Income
 - Revision of Budget and Program Plans
 - Period of Performance
 - Record Retention and Access

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- Audit Requirements
 - Procurement Process
 - Prevention of Duplication of Benefits
 - Timely Expenditures
 - Maintaining a Comprehensive Website
 - Detecting Fraud, Waste, and Abuse of Funds
 - General Program Requirements
 - Other Program Requirements
- B. Review and verify that internal controls, policies and procedures, and applicable CDBG-DR, city, and state requirements were followed for the project, including initiation to closeout procedures. The following were performed:
- Evaluated internal controls for construction management and monitoring
 - Evaluated policies and procedures for CDBG-DR requirements
 - Evaluated the procurement performed to verify solicitation, selection, and contracting are in compliance with CDBG-DR, city policies, and applicable regulations
 - Evaluated contractor and subcontractors for compliance with CDBG-DR requirements, including Davis Bacon Act and Section 103
 - Evaluated contract closeout procedures and reporting
- C. Evaluate a sample of transactions from the project to ensure the processes and procedures were performed according to applicable CDBG-DR, city, and state requirements. The following were evaluated:
- Coding and classification of transactions
 - Authorization and allowability
 - Completeness and accuracy of forms and applicable supporting documentation
 - Transactions were recorded timely in the appropriate period.

To complete these objectives, we conducted interviews with select City of Moore employees and reviewed specific process level and project transaction documentation. In addition, we tested specific project transactions against supporting documentation, verified compliance with applicable CDBG-DR, City, and State policies and procedures, verified actual expenditures were within the approved project budget, and reported within the appropriate period.

Results

Through our interviews, walkthroughs, evaluation of policies and procedures, internal controls, and testing of transactions for the three objectives, we identified five observations.

The issues identified in our audit are classified as either Findings or Observations which are defined as follows:

- **Finding:** The internal audit areas identified are considered to be non-compliance issues with documented City policies and procedures, State or Federal rules and regulations required by law, or where there is a lack of procedures or internal controls in place to cover risks to the City. These issues could have significant financial, operational, or compliance implications.

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- **Observation:** The internal audit areas identified are not considered to be non-compliance issues with documented City policies and procedures, State or Federal rules and regulations required by law. These are considered to be process improvement observations and the intent for the recommendation of the observation is to strengthen the City's current policies, processes, procedures, or internal controls in place to cover risks to the City. These issues do not have significant financial, operational, or compliance implications.

Conclusion

Based on our evaluation, we identified that the Plaza Towers Water Line Replacement Project was appropriately procured, effectively and appropriately managed, and was performed according to CDBG-DR, State and City requirements. However, we identified opportunities to enhance existing processes to include adequate support and documentation, along with incorporating processes to validate the completeness and accuracy of completed checklist/forms.

Detailed Procedures Performed, Findings, Observations, and Management Response

Policies and Procedures Review

Objective A: Review and evaluation of the City of Moore Policies and Procedures to verify compliance with CDBG-DR requirements applicable for the project.

Procedure Performed: We obtained and examined the City of Moore's Policies and Procedures to determine if the City's policies and procedures address HUD CDBG-DR and State of Oklahoma requirements, including applicable sections of:

- 2 CFR 200.302, 303, 305, 308, 309, 318, through 326, 400-475, 501, 510-512
- 2 CFR 91.505
- 24 CFR 58
- 24 CFR 570.200, 490, 500, 502, 503, 504, 506, 570, 902
- 24 CFR 85.32, 91
- FR-5582-N-01, FR-5696-N-01, FR-5710-N-01

The policy and procedure review included an evaluation of coverage of the following areas:

- Financial Management
- Internal Controls
- Payment and Financial Reporting
- Improper Payments
- Program Income
- Revision of Budget and Program Plans
- Period of Performance
- Record Retention and Access
- Audit Requirements
- Procurement Process
- Procedures for the Prevention of Duplication of Benefits
- Procedures to Determine Timely Expenditures
- Procedures to Maintain a Comprehensive Website
- Procedures to Detect Fraud, Waste, and Abuse of Funds

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- General Program Requirements
- Other Program Requirements

Results of Procedure: No findings identified.

Objective B: Review and verify that internal controls, policies and procedures, and applicable CDBG-DR, city, and state requirements were followed for the project, including initiation to closeout procedures.

Procedures Performed:

- A.** Evaluation of Internal controls for construction management and monitoring, including:
- Segregation of duties
 - Delegation of authority
 - System and user access
 - Safeguards of data and information

Results of Procedures: No Findings Identified.

- B.** Evaluation of policies and procedures for CDBG-DR requirements

Results of Procedures: Refer to the results of the Policy and Procedure review above

- C.** Evaluation of the procurement process performed to verify solicitation, selection, and contracting are in compliance with CDBG-DR, city policies, and applicable regulations, including:
- Preparation of the sealed bid, RFO, or RFQ
 - City required forms
 - Soliciting proposals
 - Procurement reviews
 - Price/cost analysis
 - Awards
 - Contract negotiation
 - Contracting

Observation #1: Through our evaluation of the sealed bid solicitation for the Veolia contract, we identified that there is no documented evidence of the Conflict of Interest Certification being performed and included in the RFQ, as required by the City of Moore's Disaster Recovery Manual, Chapter IX. Procurement, Subsection 1. However, the City's Disaster Recovery Policies and Procedures were not developed until 2015 and the RFQ that resulted in procuring Veolia was developed and advertised in 2014. Therefore, at the time of the RFQ, the City did not have documented procedures in place that mandated the inclusion of the Conflict of Interest Certification in the RFQ

Recommendation: We recommend that the City add a memorandum to the procurement file documenting the reasoning, due to timing differences, for the Conflict of Interest Certification not being performed and included in the RFQ.

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Management Response: The City will create a memo explaining the RFQ for this project was published before the Conflict of Interest Certification was added to the procurement policies and procedures.

Implementation Date: April 30, 2023

Responsible Party: Kahley Gilbert, Project – Grants Manager

Observation #2: Through our evaluation of the City's procurement procedures and the Veolia Contract, we identified that the RFQ did not include the amount budgeted for the proposed scope of service or the method of payment to be used, as required by the City of Moore's Disaster Recovery Manual, Chapter IX. Procurement, Subsection 1.

Recommendation: We recommend the City modify the Disaster Recovery Manual by delineating the differing procurement requirements between RFQ's and RFP's, including RFQ's goal is to establish a pool of vendors based on experience and qualifications. Additionally, RFQ's are not required by Uniform Guidance 2 CFR 200 or other federal regulations to include the budgeted amount, which should be clarified in the Disaster Recovery Manual.

Management Response: The City will update its policy and procedure manual to establish the difference in requirements between RFQ's and RFP's. This update will include establishing when a budgeted amount will be required for submittals.

Implementation Date: April 30, 2023

Responsible Party: Kahley Gilbert, Project – Grants Manager

Observation #3: Through our evaluation of the City's procurement procedures and the Veolia Contract, the City provided a memo stating that Veolia was the only bidder. However, there is no documented evidence that an evaluation committee completed the evaluation documentation for Veolia's bid, as required in the City of Moore's Disaster Recovery Manual, Chapter IX. Procurement, Subsection 4.

Recommendation: We recommend that the City add a memorandum to the procurement file documenting the reasoning for not performing the bidder evaluation by the evaluation committee, due to a singular bid being received. Additionally, the City should revise the Disaster Recovery Manual to include procedures and documentation requirements for procurements that do not receive the minimum number of bidders.

Management Response: The City will create a memo explaining the bidder evaluation and will update the policy and procedure manual defining the necessary documentation for procurements that did not receive multiple bids.

Implementation Date: April 30, 2023

Responsible Party: Kahley Gilbert, Project – Grants Manager

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D. Evaluation of contractor and subcontractors for compliance with CDBG-DR requirements, including Davis Bacon Act and Section 103, including:

- Labor Standards & Davis Bacon Acknowledgment
- Section 3 Training Acknowledgement
- Written Authorization Request
- Business Certification Questionnaire
- ACH Authorization Form
- Federal Labor Standards Provisions
- Progress Reports
- MOB or WOE Report

Results of Procedures: No Findings Identified.

E. Evaluation of contract closeout procedures and reporting, including:

- Master Checklist was approved by authorized personnel
- Each closeout checklist was finalized, signed by the correct personnel, and within the project file
- All required documents were approved and within the project file

Observation #4: During our review of the completed Financial Checklist and applicable supporting documentation for the Plaza Tower Waterline Project, we identified that the checklist stated liens were not applicable to this project. However, the supporting documentation did not include support validating that no liens were present or needed to be removed as part of the project. Although the City doesn't file a lien unless there is an issue with the project, documentation for the determination that no liens were established should be documented in the project files.

Recommendation: We recommend the City document within the project file the justification for indicating certain fields as not applicable for the project within the Financial Checklist, including explanatory notes or comments within the checklist.

Management Response: The City will add an explanation for fields that are not applicable to the financial checklist.

Implementation Date: March 15, 2023

Responsible Party: Kahley Gilbert, Project – Grants Manager

Observation #5: During our review of the CDBG-DR Contracting Checklist and applicable supporting documentation, we identified that the checklist states the date of contract signature to be 12/21/2015, but the contractor, Veolia, signed the contract on 12/30/2015.

Recommendation: We recommend the City add a memorandum to the procurement file documenting the reasoning for the differing contract date entered into the Contracting Checklist and validating the correct contract signature date to be included in the project file.

Management Response: The contract date was entered incorrectly on the checklist. The City will revise the checklist with the correct date and attach a memo explaining the revision.

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Implementation Date: March 30, 2023

Responsible Party: Sky Larson, Administrative Assistant

Objective C: Evaluate a sample of transactions from the project to ensure the processes and procedures were performed according to applicable CDBG-DR, city, and state requirements.

Procedures Performed:

A. Payroll Testing: Evaluate payroll transactions for compliance with David Bacon Act, Section 103, and relevant CDBG-DR requirements, including:

- Payroll Register approved by appropriate personnel
- Rate of pay is greater than or equal to the standards set by the Federal Labor Standards Provisions
- Gross amount earned for the project is accurate
- Payroll Deduction Authorization is appropriately approved
- Deductions are accurate and agree to the Payroll Deduction Authorization

Results of Procedures: No Findings Identified.

B. Project Ledger, Invoices, and Drawdowns Testing: Evaluate project ledger, invoices, and drawdowns for completeness, accuracy, appropriate approvals, and timely payment.

Results of Procedures: No Findings Identified.

C. Change Orders Testing: Evaluate Change Orders for compliance with required CDBG-DR procedures for proper approvals and appropriate supporting documentation.

Results of Procedures: No Findings Identified.

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The Curve – Tenant Application Monitoring
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Appendix...5



Kahley Gilbert
Projects Grant Manager
301 N. Broadway
Moore, OK 73160-5130

This report presents the results of the Internal Audit procedures performed for the City of Moore, Oklahoma's The Curve – Tenant Application Monitoring from July 6, 2022 to February 8, 2023, relating to the Housing and Urban Development (HUD) Community Development Block Grant - Disaster Recovery (CDBG-DR) program funding the City of Moore (City) received for the period starting December 12, 2018 to present.

The objective of the Internal Audit performed was to evaluate Belmont Development's execution of responsibilities related to the review and acceptance of applicants for the Curve property. To accomplish this objective, we tested tenant applications and supporting documentation to verify compliance with applicable CDBG-DR, City, and State policies and procedures.

The procedures were performed based on general guidelines provided by HUD CDBG-DR, the City of Moore, and State of Oklahoma. We were not engaged to, and did not perform an audit, in which the objective would be the expression of an opinion. Accordingly, we do not express such an opinion.

This report is intended solely for the use of the City of Moore and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes. The following report summarizes the procedures performed, observations and findings.

Weaver and Tidwell, L.L.P.

Weaver and Tidwell, L.L.P.
Houston, Texas
February 8, 2023

Weaver and Tidwell, L.L.P.
4400 Post Oak Parkway, Suite 1100 | Houston, Texas 77027
Main: 713.850.8787

CPAs AND ADVISORS | WEAVER.COM

City of Moore, Oklahoma
 The Curve –Tenant Application Monitoring
 HUD CDBG-DR
 February 8, 2023

Summary and Background

In May of 2013 the City of Moore Oklahoma was hit by a mile wide F-5 Tornado and experienced winds loss of 24 citizens, 2 schools, a school administration building, a regional hospital, 90 businesses and 2,400 housing units being damaged or completely destroyed. In January 2013 Congress passed, and the President signed into law, The Disaster Relief Appropriations Act, also known as Public Law 113-2 (the "Act"), which appropriated approximately \$50 billion for recovery efforts related to Hurricane Sandy and other natural disasters specified in the Act, as well as disasters occurring in the remaining months of Fiscal Year 2013. Of those funds, approximately \$16 billion was set aside for the Community Development Block Grant - Disaster Recovery Program (the "CDBG-DR Program"), to be administered by the United States Department of Housing and Urban Development ("HUD"). The Moore tornado and other tornadoes affecting Oklahoma during the period April 19th through May 31st, 2013 were included by HUD in the allocation created by the Act. The City's total HUD CDBG-DR funding received equals \$52.2 million, which are subject to federal compliance requirements based on the approved Action Plan and allocated for infrastructure, housing, and public service projects.

The Curve is located at SW 17th and Janeway Avenue, where the Royal Park Mobile Home community once stood. The site sits on over 14 acres and includes three buildings, including 4,650 square feet of commercial/retail space. There are 244 total units, including 219 affordable units and 25 market rate units. The total development cost will be \$49,725,887, which includes a \$15,840,362 subsidy provided by the CDBG-DR funds. The Curve development will be one of the final and largest projects that will be funded by CDBG-DR fund for the City of Moore. The City purchased the land in 2015 and has since completed demolition, utility installation, a masterplan for the project, and initiated construction of the project. The City selected Belmont Development on December 17, 2018 to design, finance, build, and manage the mixed-use, mixed income project. The following are the details of the project funding sources, including estimated remaining drawdowns:

The Curve – Construction and Development (SW 17th / Janeway Redevelopment) – Total \$49,725,887		
Funding Sources	Project Budget	Percent
City of Moore (CDBG-DR Funds)	\$15,840,362	32%
Perm Construction Loan - Freddie TEL (rate lock)	\$17,958,000	36%
Freddie Earn out Construction Loan (at conversion)	\$1,795,800	3.6%
LIHTC Equity	\$12,003,806	24%
Deferred Developer Fee	\$2,127,919	4.4%

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Scope and Objectives

The scope of the internal audit focused on assessing tenant application compliance for the City of Moore, Oklahoma's Curve Project to ensure the applications were complete, accurate, and compliant.

The objective of the audit was to evaluate Belmont Development's execution of responsibilities related to the review and acceptance of applicants for the Curve property. The following procedures were performed:

- Selected a sample of approved and processed Tenant Applications for the Curve property
- Reviewed the tenant application files to ensure they were complete, including appropriate supporting documentation, approved, and were processed according to applicable affordable housing standards.

To complete this objective, we tested tenant applications and supporting documentation to verify compliance with applicable CDBG-DR, City, and State policies and procedures.

Results

Through our testing of applications for the objective, we identified one finding.

The issues identified in our audit are classified as either Findings or Observations which are defined as follows:

- **Finding:** The internal audit areas identified are considered to be non-compliance issues with documented City policies and procedures, State or Federal rules and regulations required by law, or where there is a lack of procedures or internal controls in place to cover risks to the City. These issues could have significant financial, operational, or compliance implications.
- **Observation:** The internal audit areas identified are not considered to be non-compliance issues with documented City policies and procedures, State or Federal rules and regulations required by law. These are considered to be process improvement observations and the intent for the recommendation of the observation is to strengthen the City's current policies, processes, procedures, or internal controls in place to cover risks to the City. These issues do not have significant financial, operational, or compliance implications.

Conclusion

Based on our evaluation, we identified areas for improvement pertaining to Belmont Development's execution of procedures for maintaining compliance with CDBG-DR requirements which encompasses the management of tenant applications. Additional monitoring procedures by the City of Moore should be implemented to ensure future compliance with Belmont Development and CDBG-DR requirements for the Curve Project.

City of Moore, Oklahoma
The Curve –Tenant Application Monitoring
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Detailed Procedures Performed, Findings, Observations, and Management Response

Objective: Evaluation of Belmont Development's execution of responsibilities related to the review and acceptance of applicants for the Curve property.

Procedures Performed:

- A. Selected a sample of approved and processed Tenant Applications for the Curve property
- B. Reviewed the tenant application files to ensure they are complete, including appropriate supporting documentation, approved, and were processed according to applicable affordable housing standards.

Results of Procedures:

Finding #1: We selected an initial 20 applications from the 109 applicants listed in the Resident Tag Listing, which included affordable, market rate, and special accommodation units for testing, to validate that the applications were complete, from eligible applicants, and processed timely. However, 17 of the 20 applications selected have inconsistent or missing information and/or missing documentation. From the supporting documentation provided by Belmont Management, we identified the following:

- One of the twenty samples is missing the required Student Verification (BMT201) form
- Eight of the twenty samples are missing signatures on various required forms with 10 total instances identified
- Ten of the twenty samples have inconsistent information reported between documents and forms with 23 total instances identified
- Thirteen of the twenty samples have documents with missing information with 22 total instances identified
- Two of the twenty samples appear to be ineligible applicants that were self-identified by Belmont but approved for residency
- One of the twenty samples demonstrates the verification of an applicant's eligibility based on 2022 income limits (which go into effect June 15), but the application was reviewed and approved on June 6, 2022

Recommendation: We recommend that the City of Moore coordinate with Belmont Property Management to reassess review procedures to ensure complete, consistent, and accurate applications. Also, monitoring procedures of applicants should continue and be performed on a routine basis to evaluate applicant files. Follow-up procedures of the applicants reviewed should be performed timely to ensure corrective action occurred and the applicant files are complete.

Management Response: The City has scheduled a monitoring to follow up on the applicant files reviewed for this report to ensure corrective action has taken place on March 21, 2023. While on site, city staff will review application and applicant file procedures with property management staff to ensure accuracy and consistency.

Responsible Party: Ryan Coggins, Compliance Specialist

Implementation Date: March 21, 2023