

ROAD HOME PROGRAM
REVIEW OF POLICY CHANGE APPROVAL PROCESS



PERFORMANCE AUDIT
ISSUED JUNE 13, 2007

**LEGISLATIVE AUDITOR
1600 NORTH THIRD STREET
POST OFFICE BOX 94397
BATON ROUGE, LOUISIANA 70804-9397**

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FOR QUESTIONS RELATED TO THIS PERFORMANCE AUDIT, CONTACT
PATRICK GOLDSMITH, PERFORMANCE AUDIT MANAGER,
AT 225-339-3800.

Under the provisions of state law, this report is a public document. A copy of this report has been submitted to the Governor, to the Attorney General, and to other public officials as required by state law. A copy of this report has been made available for public inspection at the Baton Rouge office of the Legislative Auditor.

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STEVE J. THERIOT, CPA
LEGISLATIVE AUDITOR

OFFICE OF
LEGISLATIVE AUDITOR
STATE OF LOUISIANA
BATON ROUGE, LOUISIANA 70804-9397

1600 NORTH THIRD STREET
POST OFFICE BOX 94397
TELEPHONE: (225) 339-3800
FACSIMILE: (225) 339-3870

June 13, 2007

Jerry Luke LeBlanc
Commissioner of Administration
Division of Administration

Dear Commissioner LeBlanc:

This report provides the results of our performance audit on the Road Home program policy change approval process. The audit was conducted under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended.

The report contains our conclusions and recommendations. Appendix A contains the Office of Community Development's response to the recommendations. I hope this report will benefit your legislative decision-making process.

Sincerely,

Steve J. Theriot, CPA
Legislative Auditor

SJT/dl

RHPCAP07

Office of Legislative Auditor

Steve J. Theriot, CPA, Legislative Auditor

Road Home Program

Review of Policy Change Approval Process

June 2007



Audit Control #07502516

Objectives and Results

We conducted a performance audit of the Road Home policy change process for 83 proposed Road Home policy changes as of February 13, 2007. These policy changes vary from procedures for ICF International's operations to major changes in the Road Home program policy. The objectives of our audit and a summary of our results are:

Objective 1: How many policy changes have been proposed in the Road Home program?

Results: As of May 10, 2007, there have been 124 proposed policy changes to the program. For the purpose of this report, we reviewed in detail 83 of the proposed policy changes as of February 13, 2007.

Objective 2: Does OCD have sufficient oversight over the policy change process?

Results: OCD needs to improve its oversight over the policy change process. During the time of our review, OCD did not have anyone specifically assigned to oversee the entire policy change process.

Objective 3: How many of these policy changes have been approved and implemented?

Results: We could not determine how many policy changes have been approved and implemented because of the following reasons:

- OCD did not always sign policy changes it approved in accordance with ICF's process. We found that 32 of 45 (71%) policy forms did not have evidence of OCD signatures. Instead of signed policy forms, OCD provided minutes of meetings as documentation of approval of policies. As a result, ICF's tracking log was not accurate.
- The forms ICF used to submit proposed policy changes were inconsistent and did not contain sufficient information. As a result, we could not determine if these policies had formally been approved.
- At the time of this review, ICF's tracking log did not show where policy changes were in the process or when policy changes were implemented. Therefore, we could not determine the status of policies.
- OCD did not provide criteria to ICF for who approves policy changes. Therefore, we could not evaluate which policy changes needed approval by OCD and LRA because no criteria exist for who should approve each policy change.

Objective 4: What was the cost impact of these policy changes on the Road Home program as documented on the policy change forms?

Results: We could not evaluate the documented impact each of these proposed policy changes would have on the Road Home program's budget because 73 out of the 83 (88%) proposed policy changes we reviewed did not have a cost impact section.

Objective 5: How are policy changes communicated to the legislature?

Results: Currently, ICF does not submit any of the proposed changes to the legislature for approval unless the proposed change requires an action plan amendment to the state's action plan approved by the U.S. Department of Housing and Urban Development. In addition, neither ICF nor OCD notifies the legislature about any of the proposed changes that do not require an action plan amendment.

Audit Initiation, Purpose, Scope and Methodology

This audit is the third in a series of reports that reviews various processes within the Road Home program. We reviewed the policy change process in response to a legislative request.

For this audit, our office analyzed and reviewed all policy change proposals we received from ICF as of February 13, 2007. We obtained the policy change forms from ICF because ICF is required to maintain all original and signed copies. We conducted a review of the current policy change process, analyzed the current policy changes, and corresponded with OCD and ICF staff for

information regarding the overall policy change process. We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. We followed the generally accepted government auditing standards as promulgated by the Comptroller General of the United States.

Appendix A contains OCD's response to the recommendations in this report. Appendix B contains a description of all proposed policy changes and their status as of February 13, 2007.

Impact of Policy Changes

The effective and efficient management and implementation of policy changes is important because of the high number of policy changes that have been made and the impact that these policy changes have on the program.

The large number of policy changes impacts Road Home employees as well as applicants. For example:

- Employees may need to be retrained to understand new policies.
- Changes may need to be made to program forms and other documents.
- Modifications may need to be made to information systems.
- Applicants may need to submit documentation that is no longer accepted.
- Applicants may need to submit additional documentation after they have completed the application process.
- Changes may result in additional program costs, time, and resources.

Because of these issues, it is vital that the change management process be effectively managed to ensure that policy changes are necessary to the program and implemented correctly.

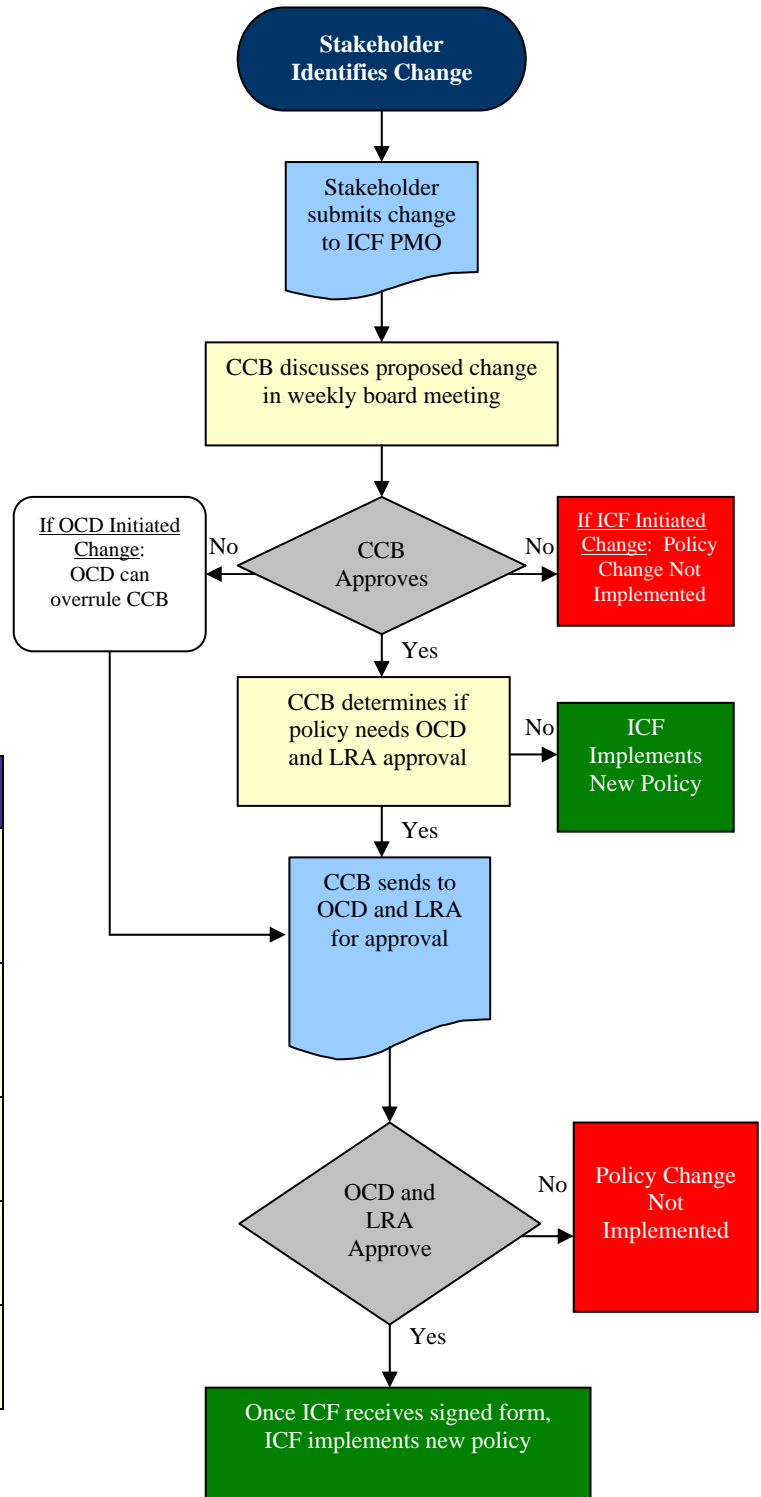
Overview of Policy Change Process and Description of Proposed Policies

As part of ICF’s contract with OCD, ICF is required to prepare policy change management requests using a web-based process. To fulfill this deliverable, ICF internally developed a policy change process to identify and seek concurrence on changes to the program related to policy, procedures, operations, and/or contracts.

The chart below outlines the participants and their corresponding role in the policy change process.

Participants	Role in Management Process
1. Stakeholders (Governor, LRA, State Agencies, OCD)	1. Define or refine LA Road Home policies
2. Office of Community Development (OCD)	2. Responsible for working with ICF on revised policies, operations, and procedures
3. ICF Executive Management	3. Responsible for execution of the LA Road Home program
4. ICF Change Control Board (CCB)	4. Analyzes, reviews, and renders final dispositions on all proposed changes
5. ICF Program Management Office (PMO)	5. Manages the change process

The following flow chart outlines the Road Home policy change process:



Objective 1: How many policy changes have been proposed in the Road Home Program?

As of May 10, 2007, there have been 124 proposed policy changes to the program. For the purpose of this report, we reviewed in detail 83 of the proposed policy changes as of February 13, 2007. These policy changes vary from procedures for ICF International's operations to major changes in Road Home program policy. Appendix B contains a description of these policies.

Some examples of these policy changes include:

- Pre-Storm Value Determination
- Homeowners' mineral rights on property
- Affordable Compensation Loan calculation for homeowners who receive elevation grant
- Using pre-storm value for relocation and sell option
- Recommended protocols for conducting home evaluations on single-family, multi-unit attached structures
- Policy for applicants in Murphy Oil Zones

Objective 2: Does OCD have sufficient oversight over the policy change process?

OCD has delegated the management of the change management process to ICF. During the time of our review of the policy changes, OCD did not have anyone specifically assigned to oversee the entire policy change process. OCD did have staff

to review and approve policies, but it did not have one person assigned to ensure this review was completed and that approved forms were sent back to ICF. As a result, OCD relied wholly on ICF to effectively manage this process and track the status and approvals of policy changes. Because OCD is responsible for overseeing ICF, it should take a more proactive role in overseeing this process.

Recommendation 1: OCD should develop a system to oversee the entire change management process. This system should include designating one person as the administrator for the policy change process.

Management's Response: OCD agrees with this response and has designated an administrator to oversee the review of CCB logs and coordinate policy changes with the designated person for each program area.

Objective 3: How many policies have been approved and implemented?

We could not determine whether many proposed policy changes were approved and implemented for the following reasons:

OCD did not always sign policy changes it approved in accordance with ICF's process. According to ICF, policies that are not signed by OCD or LRA are technically not approved. Therefore, ICF's change management process requires that policies that are elevated to the client (OCD and LRA) be signed and returned to ICF with the appropriate signatures. ICF sent 45 of the 83 policies we reviewed to OCD for approval. Of these, we found that OCD did not indicate a decision on 32 (71%) of them. Although OCD provided evidence that most of these 32 proposed policy

changes were either cancelled, rejected, or approved during meetings with ICF, OCD could not provide us with a signed copy indicating its decision on the proposed policy change form. Since OCD did not return signed copies of the approved policy change to ICF as required by the policy change process, ICF's tracking log was inaccurate.

Because of the numerous policy changes that are made in this program, it is important that OCD have an efficient system to approve or disapprove policy changes. There is also a risk that some policy changes may be implemented by ICF without having written evidence of OCD and LRA approval or disapproval. As noted in the previous section, neither OCD nor ICF have a system to track the status or implementation of policy changes so we were unable to tell which specific ones have actually been implemented.

Recommendation 2: OCD needs to follow the process that it required ICF to develop as a deliverable in its contract with ICF and return all signed proposed policy change forms to ICF. ICF needs the evidence of approval or rejection to implement the policy change.

Management's Response: OCD agrees with this recommendation and stated it has already implemented this recommendation.

The forms ICF used to submit proposed policy changes were inconsistent and did not contain sufficient information. Currently, stakeholders submit proposed changes on a policy change form. The form is intended to document the proposed policy change and provide the appropriate approval signatures of CCB, OCD, and LRA. Of the 83 proposed policy changes, we found the following:

- Twenty-six (31%) showed evidence of appropriate CCB, OCD, and LRA approval.
- Six (7%) were put on hold but did not indicate on the form why they were on hold.
- One (1%) was rejected.
- Thirty-two (39%) are awaiting OCD and LRA approval.¹
- Sixteen (19%) are awaiting CCB approval.
- One (1%) form was duplicate of a previous form.
- One (1%) form was not sent to CCB.

It was difficult to determine the status of each proposed change. Several different forms were used that contain varying levels of detail. Some of the older forms contain more detail, such as the date each stakeholder reviewed the policy change and its decision (approve, reject, or put on hold). However, the newer forms only have a place for signatures.

Many of the forms were not properly completed. For example, 16 forms had no evidence of review by any of the stakeholders (including the CCB). However, according to ICF officials, all 83 forms were reviewed by CCB.

The tracking log ICF maintains does not contain sufficient detail. The policy tracking log maintained by ICF lists whether a proposed policy has been "Signed by Client" or "Rejected by Client" and the date submitted to the client for approval. However, it does not indicate where policy changes are in the process. Therefore, we could not use the log to verify that the 32 policy changes that we identified as waiting

¹ OCD and LRA approved seven out of the 32 changes that required OCD and LRA approval in March 2007.

POLICY CHANGE APPROVAL PROCESS

on OCD and LRA approval are actually waiting for signature.

After our review, we discussed our concerns with ICF about its tracking system and ICF developed a new tracking form. This form includes the following fields: the date initiated, who initiated the proposed policy change, the Road Home program the proposed change relates to, the title and description of the proposed policy, the CCB status, the signed date, the implementation date, and the implementation status.

Recommendation 3: OCD should require ICF to develop a system that will help ensure that all proposed policy changes are managed efficiently and effectively and show evidence of status. To do this, OCD should ensure that each policy change form includes the following information:

- The date CCB met to discuss the policy and its corresponding decision on the policy
- Whether or not the proposed policy was elevated to OCD and the reasons it was elevated
- The date ICF sent the CCB approved proposed policy to OCD and LRA for approval
- The date OCD and LRA returned the signed policy form with their decision noted
- Detailed information on the programmatic and financial impact of the proposed policy change
- The date ICF implemented the policy

Management's Response: OCD agrees with this recommendation and has established a new process to track CCB forms by program area.

No criteria exist for which stakeholders should approve proposed policy changes. The current process for reviewing proposed policy changes requires that some proposed changes be approved by ICF only and some be approved by both ICF and the state (OCD and LRA). As stated previously, these policy changes can vary from procedures for ICF's operations to major Road Home program changes. However, neither OCD nor ICF has criteria for which types of policy changes should be approved by only ICF and which types should be approved by OCD and LRA. Therefore, we could not evaluate whether policy changes were approved by the appropriate entity. According to ICF, the decision of who approves policy changes is largely subjective.

Recommendation 4: OCD should require that ICF develop written criteria that specify what types of proposed policy changes require OCD and LRA approval.

Recommendation 5: OCD should require that ICF send all policy changes to them with the developed criteria from Recommendation 4 and let OCD decide whether the approval criteria applies to them.

Management's Response: OCD agrees with both of these recommendations and has required ICF to submit all future policy changes to OCD for its review and approval.

Objective 4: What is the cost impact of policy changes as documented on the policy change forms?

Because of the lack of information on the proposed policy change forms, we could not determine the cost impact of these policy changes to the Road Home program.

After reviewing all 83 proposed policy changes, we found the following:

- Seventy-three of the 83 (88%) proposed policy change forms did not have a section for cost impact.
- Two of the 83 (2%) proposed policy change forms did have a section for cost impact, but the author did not fill it out.
- Eight of the 83 (10%) proposed policy change forms had a completed section for cost impact. In many of these, the form stated that there was no cost impact to the program.

Including a cost impact analysis is important because it allows OCD to evaluate the cost effectiveness of the proposed policy change that would help determine if the policy change is necessary.

Recommendation 6: OCD should ensure that the change control form include a section on cost impact. OCD should also ensure that this section is completed on every form.

Management's Response: OCD agrees with this recommendation and notes that current CCB forms contain a budget impact section.

Objective 5: How are policy changes communicated to the legislature?

Currently, legislators and their staff do not have access to much of the policy change information. The only policy changes submitted to the legislature are those that require an action plan amendment. In addition, legislative staff do not have access to ICF's portal, which contains all proposed and approved policy changes.

During discussions with legislative staff, they told our auditors that they needed better access to policy change information.

Having access to proposed and approved policy changes would help legislative staff and the legislature keep informed about the Road Home program and all key policy changes.

Recommendation 7: OCD should require ICF to develop a standard reporting tool for new policy changes and periodically send it to all legislators.

Management's Response: OCD agrees with this recommendation but states that they currently already conduct several outreach efforts to legislators.

Recommendation 8: OCD should direct ICF to give key legislative staff access to the portal. This access will open the lines of communication between the legislature and the Road Home staff.

Management's Response: OCD disagrees with this recommendation because the portal is currently utilized as an internal management tool to review working documents and policies. Providing access to the site may create confusion regarding the status of program procedures, and increases the potential for legislators to become misinformed on issues related to the Road Home Program.

Legislative Auditor's Additional Comments: Legislators need information regarding policies and policy changes. The portal contains all information regarding policies and policy changes. Therefore, the portal appears to be the best source for key legislative staff to obtain the most complete information regarding policies and policy changes. The access given to key legislative staff can be restricted to certain sections of the portal.

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APPENDIX A: MANAGEMENT'S RESPONSE



Kathleen Babineaux Blanco
GOVERNOR

State of Louisiana
DIVISION OF ADMINISTRATION

OFFICE OF COMMUNITY DEVELOPMENT

Jerry Luke LeBlanc
COMMISSIONER OF ADMINISTRATION

June 6, 2007

Mr. Steve J. Theriot, CPA
Legislative Auditor
1600 North Third Street
P.O. Box 94397
Baton Rouge, LA 70804-9397

**RE: OCD Response to May 2007 Audit conducted by the Office of Legislative Auditor
Audit Control # 07502516 Road Home Program
Review of Policy Change Approval Process**

Dear Mr. Theriot:

This letter is written in response to your performance audit of eighty-two (82) Road Home Policy changes and the status of these changes as of February 13, 2007. The process reviewed by your office included Change Control Board (CCB) procedures for the Homeowner Program, Small Rental Program, and internal policy changes within ICF. While each of the CCB review processes vary according to the program area, the Office of Community Development (OCD) works in conjunction with the LRA and ICF. ICF was directed by OCD to create and manage a change management process in order to ensure interagency consistency in review, approval, tracking, and implementation of Road Home policies.

As you are aware, the first page of the report outlines the results of the audit and concludes that OCD should improve oversight over the CCB process and states that OCD did not have anyone specifically assigned to oversee the policy change process. In response to this audit observation it is important to reiterate that ICF developed the CCB process at OCD's direction in order to document program policy changes being managed under contract signed between ICF International and the State of Louisiana. It is important to note that ICF currently follows very specific internal procedures regarding these changes as outlined in the "LA Road Home Change Management Process". Therefore, the process that is currently in place has developed as a result of ICF's effort to facilitate an effective interagency review process. As a part of this process, OCD has tasked the managers of the Homeownership and Small Rental Programs with oversight of policies changes within their respective areas in order to ensure that changes to program policies are monitored and tracked by program area in accordance with the state's Disaster Recovery Action Plan and Community Development Block Grant (CDBG) guidelines. For this reason, OCD maintains internal review and approval policies for CCBs by program area. These policies specifically address the process and designate a person responsible for coordinating program changes within each department. These policies are attached to this letter as Exhibit A.

Mr. Steve J. Theriot
June 4, 2007
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In addition to oversight of the CCB process, the audit, as outlined in the May 2007 report, stated that it was difficult to determine which policy changes were approved and implemented. In response to these observations OCD concurs that the overall policy change process and forms have been modified as the CCB process has evolved in response to the number and types of changes occurring within the Road Home Program. These changes were implemented in order to create a better system of change management and improve tracking of policy changes. The current system includes ICF tracking of CCBs by program area, type of change, dates sent and signed, CCB status, and implementation. The log and associated CCBs are updated daily and posted on the portal for review and tracking by ICF, OCD, and LRA. In addition, internal tracking logs are maintained by OCD's Homeownership and Small Rental Programs. These logs track the review process in more detail and enable each department to document the status of proposed policy changes. It should be noted that many of the policies that were reviewed as part of the audit were ongoing policy issues currently being debated among stakeholders resulting in the tracking log, as maintained by ICF, showing incomplete status for these items as no action had been taken at the time of the audit. In some instances, stakeholders could not reach consensus on the proposed changes with some CCBs being cancelled or rejected as a result. Of the eight-two (82) changes reviewed, forty-four (44) or 54% of the CCBs were approved, sixteen (16) or 20% were cancelled, nine (9) or 11% were rejected, with seven (7) listed as outstanding. Of the total CCBs reviewed, six (6) of the changes were internal to ICF.

The audit also states that the cost impact to policy changes on the Road Home Program were not documented on the policy change forms. While this statement is true for earlier CCB forms, most CCBs at this time dealt with the interpretation of existing policies or internal administrative processes that did not impact the Road Home budget. Earlier CCBs that impacted the budget typically contained notes regarding policy impact in the text of the request or were specifically addressed in an "Additional Analysis/Impacts" section of the form. In some instances notes regarding impact were written on the bottom of CCB forms. As a result of the projected budget shortfall, all future CCBs will outline the potential budget impact of proposed policies if implemented.

As a result of the audit, several recommendations were made to the Office of Community Development (OCD). These recommendations are addressed in the order presented in the audit report as follows:

Recommendation 1: *OCD should develop a system to oversee the entire change management process. This should include designating one person as the administrator for the policy change process.*

OCD Response: OCD agrees. Tom Brennan, Deputy Executive Director, of OCD will oversee the review of CCB logs once per week and coordinate policy changes with the designated person for each program area.

Recommendation 2: *OCD needs to follow the process that they required ICF to develop as a deliverable in their contract with ICF and return all signed proposed policy change forms to ICF. ICF needs evidence of approval or rejection in order to implement the policy change.*

OCD Response: OCD agrees. These changes have already been implemented for all CCB policy decisions.

Recommendation 3: *OCD should require ICF to develop a system that will help ensure that all proposed policy changes are managed efficiently and effectively and show evidence of status. To do this, OCD should ensure that each policy change form includes the following:*

- The date the CCB met to discuss the policy and their corresponding decision on the policy.
- Whether or not the proposed policy was elevated to OCD and the reasons it was elevated.
- The date ICF sent the CCB approved proposed policy to OCD and LRA for approval.
- The date OCD and LRA returned the signed policy form with their decision noted.
- Detailed information on the programmatic and financial impact of the proposed policy change.
- The date that ICF implemented the policy.

OCD Response: OCD agrees. OCD and ICF have been working to establish a more efficient tracking system. A new process has been established where CCB items are tracked by program area (i.e. ICF internal CCBs, Single Family Housing CCBs, Rental CCBs), CCB type (policy or implementation), date submitted and signed, status, and implementation. This system has enabled OCD to more readily identify action items, track the approval process, and implementation status.

Recommendation 4: *OCD should require that ICF develop written criteria that specify what types of proposed policy changes require OCD and LRA approval.*

OCD Response: OCD agrees. OCD will review and sign all policy changes in the future whether procedural, policy or implementation related. Therefore, development of written criteria will not be necessary.

Recommendation 5: *OCD should require that ICF send all policy changes to them with the developed criteria from recommendation #4 and let OCD decide whether the approval criteria applies to them.*

OCD Response: As stated above, OCD will review and sign all future CCBs.

Mr. Steve J. Theriot
June 4, 2007
Page 4

Recommendation 6: *OCD should ensure that the change control form include a section on cost impact. OCD should also ensure that this section is completed on every form.*

OCD Response: OCD agrees. Current CCB forms contain a Budget Impact section which is typically completed when a policy change has an impact. OCD will continue to ensure that this section of the CCB form is consistently completed prior to signing the form.

Recommendation 7: *OCD should require ICF to develop a standard reporting tool for new policy changes and periodically send it to all legislators.*

OCD Response: OCD agrees that legislators should be informed. ICF currently conducts several outreach efforts to legislators such as E-Outreach which is a weekly communiquéé to approximately 1,100 legislators, staffers, and community leaders informing them of program updates and details. In addition, ICF provides program information to legislators as requested during the legislative session.

Recommendation 8: *OCD should direct ICF to give key legislative staff access to the portal. This will open the lines of communication between the Legislature and Road Home staff.*

OCD Response: OCD disagrees with this recommendation as the portal is currently utilized as an internal management tool to review working documents and policies. Providing access to the site may create confusion regarding the status of program procedures, and increases the potential for legislators to become misinformed on issues related to the Road Home Program.

Sincerely,



Thomas Brennan
Deputy Executive Director
Office of Community Development

TB/lr


cc: Suzie Elkins, OCD Executive Director
Mike Taylor, DRU Executive Director
Mike Spletto, Senior Housing Manager
Calvin Parker, Small Rental Program
Isabel Reiff, ICF

Interoffice Policy and Procedure for handling RH Single Family CCB's

May 2nd, 2007

Prepared by Michael Spletto, Senior Housing Manager

1. All CCB's will be created on the ICF CCB Form
2. ICF, OCD or LRA may initiate a CCB
3. The initiator will discuss the CCB with ICF for ICF to prepare the CCB on the form
4. ICF will follow their internal policy for reviewing the new CCB
5. Once ICF approves or disapproves the CCB through their internal process they will forward it on to LRA and OCD for review (email sent to Lara Robertson and Adam Knapp)
6. Lara Robertson has been designated to review CCB for OCD
7. Adam Knapp has been designated to review CCB for LRA
8. Adam and Lara will discuss the CCB and determine if any changes are needed prior to Directors or Managers review. If a larger discussion group is necessary to discuss the CCB, a meeting will be requested with other interested parties
9. If any changes are suggested, the CCB must be returned to ICF to make changes and run through their internal process again
10. If no changes are necessary, Adam Knapp will review the CCB with Andy Kopplin for his signature
11. LRA will send over their signed copy to Lara Robertson for OCD signature and approval
12. Lara Robertson will discuss the CCB with Michael Spletto, who will review one last time and if no changes are necessary will review CCB with Suzie Elkins for her signature
13. If changes are still necessary, the process will start over again with ICF internal policy
14. Once both signatures are on the CCB it will be sent to LRA, ICF and a copy retained at OCD for their files
15. The LRA signature on the CCB form indicates that the LRA agrees with the policy, the OCD signature on the CCB indicates that the OCD agrees to implement the policy


Michael Spletto, Senior Housing Manager

5/2/07
Date


Mike Taylor, Director, DRU

5/2/07
Date


Suzie Elkins, Director, OCD

5/2/07
Date

Interoffice Policy and Procedure for handling RH Single Family CCB's
January 18th, 2007
Prepared by Michael Spletto, Senior Housing Manager

1. All CCB's will be created on the ICF CCB Form
2. ICF, OCD or LRA may initiate a CCB
3. The initiator will discuss the CCB with ICF for ICF to prepare the CCB on the form
4. ICF will follow their internal policy for reviewing the new CCB
5. Once ICF approves or disapproves the CCB through their internal process they will forward it on to LRA and OCD for review
6. Michael Spletto has been designated to review CCB for OCD
7. Adam Knapp has been designated to review CCB for LRA
8. Adam and Michael will discuss the CCB and determine if any changes are needed prior to Directors review. If a larger discussion group is necessary to discuss the CCB, a meeting will be requested with other interested parties
9. If any changes are suggested, the CCB must be returned to ICF to make changes and run through their internal process again
10. If no changes are necessary, Adam Knapp will review the CCB with Andy Kopplin for his signature
11. LRA will send over their signed copy to Michael Spletto for OCD signature and approval
12. Michael Spletto will review one last time and if no changes are necessary will review CCB with Suzie Elkins for her signature
13. If changes are still necessary, the process will start over again with ICF internal policy
14. Once both signatures are on the CCB it will be sent to LRA, ICF and a copy retained at OCD for their files
15. The LRA signature on the CCB form states that the LRA agrees with the policy, the OCD signature on the CCB that the OCD agrees to implement the policy


Michael Spletto, Senior Housing Manager

11/18/2007
Date


Mike Taylor, Director, DRU

11/18/2007
Date


Suzie Elkins, Director, OCD

11/19/07
Date

OFFICE OF COMMUNITY DEVELOPMENT DISASTER RECOVERY UNIT

CCB POLICY/SMALL RENTAL PROPERTY PROGRAM

SUBJECT: LCD/DRU PROCEDURES FOR PROCESSING/IMPLEMENTATION OF CCB'S

AUTHORIZATION: CALVIN PARKER, SRPP MANAGER

I. PURPOSE

ICF, as a contractor for the Road Home Program, has developed internal Change Control Policy (CCB) for the Small Rental Property Program (SRPP) that requires the participation of OCD/DRU and LRA. The purpose of this policy is to establish the process for documenting and what actions are being taken to implement the CCB policy for each round.

II. APPLICABILITY

This policy applies to all employees of OCD/DRU assigned to the SRPP. Lisa Bergeron has been designated as the internal SRPP administrator for CCBs; Wil Jacobs for the LRA; Lilly Shoup for ICF.

III. CCB PROCEDURE

1. CCBs are generally generated by ICF on a form that was created by them, pursuant to ICF policy, which may or may not involve prior discussions with OCD/DRU and/or LRA. LRA or OCD/DRU may initiate a policy change that will result in a CCB. Additionally, ICF generates and circulates, on a weekly basis, a CCB tracking log to assist in the management of the policy changes.
2. ICF will deliver to Lisa Bergeron /Bob Barbor via email a proposed CCB, regardless of which organization originated the proposed policy. The CCB is circulated to all members of the OCD/DRU SRPP team for review and comment. Additionally, a hard copy is maintained in a CCB book maintained by Lisa Bergeron.
3. Lilly Shoup provides OCD/DRU with a tracking log specifically designed for SRPP, showing which are outstanding, needing further discussion, approval, or rejection.
4. Each Thursday, an SRPP policy meeting is held between ICF, OCD/DRU, and LRA, which includes outstanding CCBs. If a change is recommended, the CCB is amended accordingly and resubmitted to OCD/DRU and LRA or deferred for further discussion with all parties.
5. If no changes are needed, and OCD/DRU and LRA are in agreement, ICF will forward the CCB via email to Wil Jacobs of LRA. ICF will "cc" Lisa Bergeron and Bob Barbor. CCBs must be executed and signed by Andy Kopplin of LRA prior to OCD's approval.

6. Lisa Bergeron follows up each week via email to Wil Jacobs to obtain a status of outstanding CCBs. There is also discussion at each weekly meeting regarding the outstanding CCBs, and where they stand with Andy Kopplin.

7. After signature by Andy Kopplin, the signed CCB is sent to Lisa Bergeron for signature by Suzie Elkins of OCD. If any changes deemed needed by Suzie Elkins or Andy Kopplin, then the CCB is returned to ICF for further discussion at the following weekly meeting.

8. If both the LRA and OCD have agreed to and signed off on the CCBs, Lisa Bergeron will forward those to ICF via email and maintain the hard copy in the CCB book.

9. Executed CCBs are posted on the ICF portal by Elizabeth Norton and the tracking log is updated accordingly.

10. Lisa Bergeron shall prepare a weekly summary of all outstanding CCBs, their location, execution status, and any other relevant information.

IV. CCB MONITORING

1. OCD/DRU will monitor ICF's internal process for tracking and seeking approval of policy changes. This will include all CCB policy changes whether limited to ICF or applicable to OCD/DRU and LRA.

2. OCD/DRU shall maintain an updated copy of ICF's change management procedures.

3. Periodically, OCD/DRU staff will review with ICD staff the CCB internal policy to insure the accuracy of the process and reporting procedures.

4. ICF and OCD/DRU shall create criteria for which types of policy changes should be approved by only ICF and which types should be approved by OCD/DRU and LRA.

5. ICF shall provide OCD/DRU with all policy changes, referred to in item #4 above, to insure compliance therewith.

EFFECTIVE DATE: May 4th, 2007



Calvin Parker,
Manager Multifamily Housing Programs

5/4/2007

Date



Mike Taylor, Director, DRU

5/4/2007

Date



Suzie Elkins, Director, OCD

5/4/07

Date

**OFFICE OF COMMUNITY DEVELOPMENT
DISASTER RECOVERY UNIT**

CCB POLICY/SMALL RENTAL PROPERTY PROGRAM

**SUBJECT: OCD/DRU PROCEDURES FOR
 PROCESSING/IMPLEMENTATION OF CCBs**

AUTHORIZATION: CALVIN PARKER, SRPP MANAGER

I. PURPOSE

ICF, as the contractor for the SRPP, has developed an internal policy control procedure that requires the participation of OCD/DRU and LRA. The purpose of this policy is to establish the internal DRU process for handling, documenting, and acting on all CCBs that require DRU action.

II. APPLICABILITY

This policy applies to all employees of DRU assigned to the SRPP. Lisa Lester has been designated as the internal SRPP administrator for CCBs.

III. PROCEDURE

1. CCBs (on ICF form) are generally generated by ICF pursuant to ICF policy (which may or may not involve prior discussions with OCD/DRU and LRA). However, LRA or OCD/DRU may also initiate a policy change (on ICF form or email) that will result in a CCB. Additionally, ICF generates and circulates, on a periodic basis, a CCB tracking log to assist in the management of the policy changes.
2. Upon receipt of a proposed CCB by DRU (delivery by email from ICF Small Rental Team to Lisa Lester/Bob Barbor), the CCB is circulated to all members of the DRU SRPP team for review and comment. Additionally, a hard copy is maintained in the CCB book maintained by Lisa Lester.
3. If changes are suggested and agreed to by the SRPP Manager, then the proposed changes are communicated to ICF and the CCB is amended accordingly and resubmitted to DRU/LRA or elevated for further discussion with ICF, DRU and LRA. Additionally, LRA may have suggested changes to the CCB, which are resubmitted to ICF and/or elevated for joint discussion.

- 4. If no changes are needed, and DRU and LRA are in agreement, the CCB must be executed by LRA (Andy Kopplin) and OCD/DRU (Suzie Elkins).**
- 5. If the CCB is initially signed by LRA, the CCB is sent to DRU (Lisa Lester) for signature by OCD (Suzie Elkins). If a CCB is signed by OCD prior to LRA, it is sent to LRA for execution. If any changes are required by either Andy Kopplin or Suzie Elkins, then the CCB is returned to ICF for further handling.**
- 6. Fully executed CCBs are sent by Lisa Lester to LRA and ICF, with a hard copy maintained at DRU.**
- 7. Executed CCBs are posted on the portal by ICF and the tracking log updated accordingly.**
- 8. OCD/DRU staff will also review CCBs and the tracking log to determine if any are no longer applicable or have become an inaccurate statement of policy by subsequent policy changes, CCBs or program developments. Any such CCBs on the portal or tracking log will be marked as such and appropriately linked to any subsequent CCB that reflects current policy.**

**APPENDIX B: PROPOSED POLICY CHANGES
AND THEIR STATUS
AS OF FEBRUARY 13, 2007**

CCB #	Date Submitted	Title	Description
1	9/13/2006	Changing procedures for submitting work order to Home Eval team	Include a data verification step before work order is sent to the home evaluator and the type of elevation is determined
2	9/13/2006	Provide Homeowners with Home Evaluation document	Determine whether or not to provide all homeowners with the home evaluation document
3	9/13/2006	Affordable Loan Compensation to not include elevation cost	Determine whether to include the elevation cost estimate in the Affordable Loan Compensation grant
4	9/28/2006	Calculation of benefits for owners of manufactured homes and leased land	Policy recommendation for calculating benefits for manufactured homeowners who own the land and also lease out the land
8	9/28/2006	Checkbox for Household Income	Application currently does not have a place to indicate household income
8-Rev1	10/5/2006		
13	9/28/2006	Clarification of Eligibility Rules and Rules for Calculator	Clarify and finalize policies involving the Calculator
14	9/20/2006	Reimbursing Non-Profit Agencies	Determine whether non-profit agencies are allowed to obtain and verify programmatic assistance from the Road Home program
15	9/20/2006	Immigration status re applicants	Determine policy to assist illegal immigrants seeking applications
15-Rev1	10/17/2006		Road Home will accept any government issued photo ID
16	9/20/2006	Elderly Exemption	Exemption from penalty for choosing "sell" for those 62 yrs older or more
17	9/29/2006	Eligibility of 3 and 4 unit owner occupants	Determine policy regarding the discrepancy of Small Rental program and Homeowner program involving eligibility of 3 and 4 unit owner occupants
18	9/20/2006	Insurance Deductions for unattached structures and architectural details	Determine whether it is permissible to deduct unattached structures and architectural details from award grant, as many are covered by homeowner insurance companies
19	9/20/2006	Buyouts with no sale of land	Determine whether homeowners can sell their homes but keep the land on which it sits

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

POLICY CHANGE APPROVAL PROCESS

CCB #	Date Submitted	Title	Description
19 A	2/7/2007		
20	10/2/2006	Evaluator Risk Mitigation Plan	Utilize tracking methods to compare trends of individual evaluators to the state, parish, and zip code level
21	9/28/2006	Market Adjustment of Appraisal to establish Pre-Storm Value	Adjust appraisals provided by homeowner to reflect the market rate as of August 2005
22	9/28/2006	Using Pre-Storm Value for relocate and sell option	Funding assistance calculation is adjusted so that the funding for homeowners whose homes are equal to or greater than 51% damaged and choose Options 2 or 3 will be based on pre-storm value
23	9/28/2006	Home Evaluation Methodology	Determine home evaluation policy between the client and The Road Home program
24	9/28/2006	Affordable Compensation Loan Calculation for Homeowners who receive Elevation Grant	Determine whether the Road Home program pays for unmet mitigation needs beyond the \$30K for those that are eligible for the loan
24-Rev1	10/2/2006		Will include unmet mitigation as part of the loan calculation
24-Rev2	10/11/2006		Unmet elevation costs covered under ACL are capped at elevation cost estimate under Rebuild
25	9/28/2006	Assignability	Determine whether new homeowner is eligible to participate in the Road Home program if the original homeowner sold the home and assigned rights to the new homeowner
25-A	11/3/2006		Allows homeowners to assignee their rights to RH assistance to a buyer prior to receiving RH benefits
25-B	11/12/2006		Created Assignability legal document
25-C	12/4/2006		Finalized the policy for assignment to include in the Action Plan
26	9/28/2006	Clearance of Properties	Determine policy regarding how to handle properties prior to and following acquisition taking into account environmental and SHPO review

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

CCB #	Date Submitted	Title	Description
27	9/28/2006	No Build Zones--Community Determined	No Build Zones to be voluntarily created by homeowners and local governments prior to Road Home benefits calculation
28	9/28/2006	Credit to Homeowners for legal fees associated with obtaining insurance proceeds	Consider adjusting the amount of insurance deducted from award as "duplication of benefits" by the amount of legal fees paid by homeowners to attorneys to collect the insurance
29	10/3/2006	Save a Hard Copy of Application after data entered into E-Grants	Determine what to do with hard copy applications following being entered into E-Grants
30	10/23/2006	Replace "Appraisal Value of Replacement Home" with "Pre-Storm Value of storm damaged residence" in Calculator	Ensures RH program does not provide undeserved compensation to a homeowner who chose to purchase a home that was worth less than their storm damaged residence
30-A	10/23/2006		Continue to use the estimated cost to repair/rebuild the property as the basis for the Affordable Compensation Loan calculation for Homeowners choosing option 1
30-B	12/12/2006		Decided to cap ACL to \$50K, so it's unnecessary to obtain appraisal value of the replacement home
31	10/24/2006	Alternative Buyout Option - Retain Land	Determine whether homeowners with large plots of land can sell their homes but retain the land used for economic or agricultural gain
31-A	12/4/2006		Reconsiders different options of buying out and allowing applicant to keep productive land
31 B	2/7/2007		
32	10/26/2006	Prioritization for Ordering Home Evaluations	Focus on applications with higher probability of reaching award calculation in order to forestall delays
33	10/26/2006	Signed Statements for Verification	Accept signed statements from homeowners for calculation and verification of insurance payments and FEMA payment to be done before closing
34	10/26/2006	Approve New Evaluation Subcontractors	Approve the use of new home evaluation subcontractors

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POLICY CHANGE APPROVAL PROCESS

CCB #	Date Submitted	Title	Description
35	10/26/2006	Improve Data Matching	Improve data matching algorithms and hastening data collection
36	10/26/2006	Use of Aerial Photography	Minimize need for home evaluation prior to calculation by using aerial photography to calculate square footage in order to determine the rebuild cost
37	10/26/2006	Sourcing for Square Footage	Acquire square footage from a variety of sources
38	10/26/2006	Express Appointments	Create an express appointment for homeowners who have all their documents and choose to bypass counseling at the intake stages
40	10/26/2006	Increased Advisor Productivity	Increase productivity of housing advisors by shortening appointments and enabling advisors to see 5 applicants per day
41	10/26/2006	Phone-In Applications	Initiate a process to allow homeowners to phone in their applications
43	10/26/2006	Additional New Orleans Center	Ensure a second New Orleans Housing Assistance Center with Sunday capacity to be open by December 15, 2006
44	11/21/2006	Award Amounts to include ACLs	Include the dollar value of Affordable Compensation Loans for low/mod income households in the weekly pipeline report
45	11/20/2006	Disbursement of Funds Directly to HO if \$7,500 or less	Permit funds to be disbursed at closing directly to homeowner without deposit into a disbursement account
45-A	11/28/2006		Permit funds to be disbursed at closing for \$7,500 or less
45-B	12/12/2006		Finalized policy to allow disbursement of funds for \$10,000 or less
46	11/28/2006	Submittal of Home Evaluation Report Clarification	Determine various policies regarding the Home Evaluation Report (aka CADs) including the amount of information included, when distributed, and whether to distribute a cost breakdown
47	11/17/2006	Closing with homeowner's self-certified insurance data	Allow for calculations of homeowner awards based on insurance information provided by the homeowner's applications
48	11/29/2006	Collecting Income Information	Request homeowners submit the CDGB reporting form indicating their household income ranges and provide supporting documentation

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

CCB #	Date Submitted	Title	Description
49	11/30/2006	Allow homeowners to provide their own post-storm appraisals	Allow homeowners to provide as evidence of pre-storm value an appraisal made after the storm and paid for by the homeowner
49-A	12/12/2006		Accept alternative pre-storm value determinations
50	12/5/2006	Repair/Replace Policy for Duplex Structures	Determine policy for multiple unit duplexes with variety of homeowner options--single or multiple owners
51	12/5/2006	Repair/Replace Policy for Mobile Homes	Determine policy for damaged manufactured or mobile homes
52	12/6/2006	Information Management Policy Finalization	Determine final changes to the Information Management policies and load onto portal
53	12/5/2006	Requesting Funding after document have been executed	Request funding after the homeowners have signed their closing documents
54	12/12/2006	Determination of FEMA 'major' or 'severe' if the home has been demolished	Finalize policy regarding what to do when the house has been cleared or demolished and the program must make assumption that the home was cleared due to the storm
55	12/12/2006	Homeowner Compensation Assistance for Condominiums	Condos must meet the same eligibility for Homeowner Assistance as other homeowners, but Option 1 selections must include all owners in the condominium complex
55 A	1/23/2007	Condominium Policy	Condominium units are a unique form of a single family property, requiring different considerations for applicants; offers several options for Homeowner program
55 B	1/24/2007		
55 C			
56	12/15/2006	Allowing applicants without clear title to apply to Small Rental	If the property owner does not have clear ownership of a property, the applicants should be allowed to submit their applications to the Small Rental Property Repair program
57	12/15/2006	Homeowners applying for the Rental Program	Homeowners who apply for Homeowner assistance but do not receive an award may apply for the rental program to repair their former homes and then rent the homes out

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

POLICY CHANGE APPROVAL PROCESS

CCB #	Date Submitted	Title	Description
57-A			Properties which were used as Primary residences before the storm are not eligible to apply for the Rental Repair Program in Round I
58	12/19/2006	Option 2: Relocate--Closing Process	Explains how the Road Home program will execute the closing process for homeowners in different situations under Option 2: Relocate
59	12/20/2006	Mobile Home compensation grant and affordable compensation loan awards and program requirements	Provide mobile homeowners with enough funding to obtain replacement housing
60	12/20/2006	Duplication of Benefits	Requesting determination from HUD that the awards given to property owners are "recovery incentives" and therefore not subject to the duplication of benefits requirements of the Stafford Act
60-A			Requesting clarification from HUD that awards are a CDGB eligible activity
61	12/20/2006	Eligible structures for the Rental Program	No mobile homes are eligible, modular homes are eligible for repair, and no condos are eligible
62	12/20/2006	Tardy and/or incomplete application policy	Paper applications are accepted postmarked by the date of the end of the round; incomplete applications will not be entered into the system
62-A			Paper applications will be accepted by 5 p.m. on the date of the end of the round; incomplete paper applications will not be entered into the HDS system
62-B			Paper applications will be accepted by 5 p.m. on the date of the end of the round; rental program will keep the application and include it in the following rounds and send the applicant a letter indicating that the application will be re-entered
63	1/2/2007	Tracking LMI for applicants and borrowers	A decision is needed regarding the tracking of applicants and/or borrowers' LMI status
63-A			Recommend tracking the LMI status of borrowers who pass threshold and continue through the funding process, rather than all of the applicants

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CCB #	Date Submitted	Title	Description
64	1/2/2007	Eligibility for Divorced Owners	For Round I, applicants may plead their cases to the appeals board or re-apply in future rounds
64-A			Allow divorced owners to apply when one partner has received full ownership of the property after the storm in a divorce settlement; proof of settlement is required
65	1/2/2007	Ownership entities as owner occupied applicants	Determine whether partnerships, corporations and nonprofits can apply as owner-occupied properties.
65-A			Allow partnerships, corporations and nonprofits to apply as owner-occupied applicants as long as they can prove their homestead exemption certificate of the property.
66	1/2/2007	Tracking paper applications during Round I	Need to develop a process and procedure to manage paper applications for a minimum of thirty days.
67	1/2/2007	Naming convention for asset management	Develop a naming convention for applications and loans.
68	1/2/2007	Name Change for Rental Program	All marketing and outreach material refer to the program as "The Road Home's Rental Property Repair Program"
68-A			" "
69	1/3/2007	Closing of Road Home award and enhanced award	A determination on the timing for the closing of the Road Home award and enhanced award needs to be made; recommend closing in conjunction with lender's construction loan but not advance funds at the closing; funding occurs at the end of all construction activity and final inspection
70	1/4/2007	Limiting First Round eligibility to owner occupants	Recommend to limit Round I to owner occupants of 3 or 4 unit properties, include only paper applications and be 30 days long, running from January 29 to March 1, 2007.
72	1/5/2007	Case by Case change of a home evaluation from Type 1 to Type 2	There are legitimate occasions where changing to a Type 2 evaluation is warranted based on site observations
73	1/8/2007	Process for Owner-Occupied 3 and 4 Unit properties	Clarifies the processing of multiple unit properties with owner occupants by providing a single focal point and process via the Rental Program

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POLICY CHANGE APPROVAL PROCESS

CCB #	Date Submitted	Title	Description
74	1/9/2007	Recommended protocols for conducting home evaluations on a single family, multi-unit attached structures	Complex wall, roof, and elevation sharing scenarios require a protocol for conducting home evaluations on attached row homes
74-A	1/13/2007		Proposes two options regarding elevation for townhomes
74 B	2/7/2007		
75	1/11/2007	Permit homeowners to appeal their benefits after they have received Road Home benefits	Allows homeowners to go to closing with the benefits calculation provided to them and to appeal the level of benefits after they have received the initial funds
75 A			
76	1/15/2007	Non-Profit Application	Allows nonprofit organizations their own separate application and is offered later in the program
77	1/16/2007	Owner-occupied 3 and 4 unit properties with non-rental units	Owner-occupants who occupy a structure with other units housing family members must demonstrate that those family members qualify as low-income tenants in order to receive Road Home assistance
78	1/16/2007	Multiple Owner-Occupants in 3 and 4 unit properties	Co-owners who reside in a multiple unit property will submit one application for assistance; each owner-occupant unit is eligible for \$150K
80	1/16/2007	Permit homeowners to close under Option 2 even if they have not purchased a new home	Allows homeowners to schedule and execute a closing prior to the purchase of a new home
80 A			
82	1/16/2007	Implementation of rehabilitation/reconstruction minimum standards and ineligible work items	Minimum standards for rehabilitation of rental properties will ensure that the assisted stock is decent, durable, livable housing
83	1/18/2007	Definition of ownership size	Need final policy determination as to how to determine rental property size

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

CCB #	Date Submitted	Title	Description
84	1/18/2007	Enhanced Awards	Enhanced awards will not be offered in the small rental program; awards will be forgivable loans lasting 10 years
85	1/18/2007	Three Award Tables	Three tables established for the 13 eligible parishes based on AMI levels and expected rents
86	1/24/2007	Trumping of homeowner provided FEMA and Insurance data	Allow RH to change insurance proceed amount/FEMA proceed amount if the homeowner provides documentation demonstrating the 3rd party verified amount in inaccurate
86 A			
88	1/24/2007	IMM revision of Final Policies	IMM grant funds may be disbursed to the applicant in conjunction with the disbursement of the other Road Home funds without a global match from GOHSEP and FEMA
89/55		Condo Policy--please refer to CP 55	
90	1/31/2007	Use of BPOs/Appraisals for Mobile Homes	Use a BPO/Appraisal first when determining PSV, and use the NADA guide if the BPO or appraisal method is not feasible
91	1/31/2007	Determination of square footage used for Type 1 rebuild calculations	Consider using square footage data from sources other than that determined by home evaluators on a case-by-case basis
92	1/31/2007	Calculation of damage to structures added to mobile homes	If an addition is added to a mobile home using "sticks," consider the stick built allowance using square footage rates
92 A	2/7/2007		Evaluate mobile homes with stick built additions as mobile homes, allowing homeowners to contest this policy during the appeals process
93	1/31/2007	Finalization of process delivering approved CCB forms to the client	PMO assumes responsibility for sending and receiving approved/signed CCB forms in an effort to better coordinate and control information
94	2/7/2007	Subordination After Closing	Allow First American to close prior to receiving the signed subordination documents from the lender
94 A			
94 B			

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.

POLICY CHANGE APPROVAL PROCESS

CCB #	Date Submitted	Title	Description
95	2/7/2007	Policy for applicants in Murphy Oil Zones	Applicants in the Murphy Oil Zones will be processed differently depending upon whether or not they choose Option 1 or Options 2 and 3
96	2/7/2007	Reserve mineral rights on property being transferred to the RH program under buyout option	Allows homeowners to reserve their mineral rights on property being sold to the RH program under the buyout option

Note: Multiple listing for one proposed policy change indicates multiple revisions within that policy.