

Memorandum



CITY OF DALLAS

DATE November 15, 2019

TO Honorable Mayor and Members of the City Council

SUBJECT **Update on HUD OIG CHDO Program Audit 2019-FW-1004**

On November 1, 2019, the Fort Worth HUD Office provided its response to the Office of Inspector General (OIG) Community Housing Development Organization (CHDO) Audit report issued on June 17, 2019 for the audit covering years 2016-2017. On May 29, 2018, City Council was notified via the Taking Care of Business (TCB) announcement that the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General (OIG) was conducting an audit of the City's administration of CHDOs. See link below to review the 06/01/2018 TCB memorandum:

https://dallascityhall.com/government/citymanager/Documents/FY17-18%20Memos/Takin-Care-of-Business-May-29,-2018_Memo_060118.pdf

HUD Fort Worth issued the following management decisions in a letter dated November 1, 2019 (attached) regarding the OIG audit report:

Finding 1: The City did not follow environmental requirements.

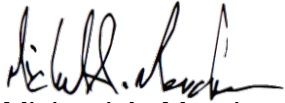
Finding 2: The City did not effectively manage its Community Housing Development Organizations (CHDO).

The City is working with HUD's Office of Community Planning and Development to resolve these findings and reduce potential repayments.

As is the standard practice with HUD audits and monitoring reports, a considerable amount of negotiation is undertaken to mitigate adverse effects or consequences of any finding. The length of time required for negotiations is uncertain and repayments made to HUD have historically been less than initially identified. If after all options have been exhausted and a return of funds is warranted, repayment must be made from general funds. Staff will keep apprised of our final negotiation.

DATE November 15, 2019
SUBJECT **SUBJECT**

For additional details please contact David Noguera, Director of Housing and Neighborhood Revitalization at david.noguera@dallascityhall.com or 214-671-5988.



Michael A. Mendoza

Chief of Economic Development and Neighborhood Services

c: T.C. Broadnax, City Manager
Chris Caso, City Attorney (Interim)
Mark Swann, City Auditor
Biliera Johnson, City Secretary
Preston Robinson, Administrative Judge
Kimberly Bizzor Tolbert, Chief of Staff to the City Manager
Majed A. Al-Ghafry, Assistant City Manager
Jon Fortune, Assistant City Manager

Joey Zapata, Assistant City Manager
Nadia Chandler Hardy, Assistant City Manager and Chief Resilience Officer
M. Elizabeth Reich, Chief Financial Officer
Laila Aleqresh, Chief Innovation Officer
M. Elizabeth (Liz) Cedillo-Pereira, Chief of Equity and Inclusion
Directors and Assistant Directors



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Fort Worth Regional Office, Region VI
Office of Community Planning and Development
801 Cherry Street, Unit #45
Suite 2500
Fort Worth, TX 76102
www.hud.gov

November 01, 2019

T.C. Broadnax, City Manager
City of Dallas
ATTENTION: Chan Williams
1500 Marilla, 4EN
Dallas, Texas 75201-6390

Dear Mr. Broadnax:

SUBJECT: Office of Inspector General for Audit
Audit Report Number: 2019-FW-1004
Management Decisions and Corrective Actions

On June 17, 2019, the United States Department of Housing and Urban Development's (HUD) Office of Inspector General for Audit (OIG) issued an audit report concerning the city's management of the environmental review procedures and requirements and the Community Housing Development Organizations (CHDO) program. The enclosed report contained two findings and twelve recommendations. This letter transmits the Fort Worth Field Office of Community Planning and Development's (CPD) management decisions and corrective actions that the city must take to clear the findings and address each of the recommendations.

In Table 1 below, CPD identifies the HOME projects included in the OIG report. The grant amounts identified in OIG's findings and recommendations may differ from the amounts included in CPD's management decisions because CPD used the amounts funded and drawn from HUD's Integrand Disbursement and Information System (IDIS), as of October 30, 2019.

OIG Finding 1: The city did not follow environmental requirements.

OIG Recommendations:

- A. Repay \$2,398,872 from non-Federal funds to the city's HOME program for funds committed to projects before completion of an environmental review or HUD approval.
- B. Support or repay \$424,325 from non-Federal funds to the city's HOME program for funds committed without documentation of an environmental review.
- C. Comply with HOME's environmental requirements, including restrictive contract language, and maintaining documentation of environmental reviews.

**Table 1
City of Dallas
OIG Finding #1
Summary of HOME Activities**

Project Name IDIS Activity #	Funds Committed	ER Completed	AUGF signed by HUD	Amount Funded per IDIS	Amount Drawn per IDIS
Builders of Hope – Prairie Creek Phase 3. #12029	9/10/2014	11/14/2014	12/24/2014	\$629,940	\$629,940.00
EDCO Scattered Sites (4 of 10 sites) #12606	4/18/2017	9/14/2017 (4 sites)	11/1/2017	\$586,778.44	\$486,778.44
EDCO Scattered Sites (6 of 10 sites) #12606	4/16/2017	Not provided.	3/2/2017	See above	See above
ICDC Scattered Sites (5 of 11 sites) #12303	8/30/2015	10/23/2015	12/10/2015	\$1,220,000	\$286,775.47
ICDC Scattered Sites (6 of 11 sites) #12303	11/7/2017	1/30/2018	3/21/2018	See above	See above
ICDC Pittman – Final Phase #s: 12286, 12287, 12288, 12289	7/1/2015	Not provided	7/30/2015	\$353,968.70	\$353,968.70
Total				\$2,790,687.14	\$1,757,462.61

The Fort Worth CPD Field Office consulted with HUD’s Office of Affordable Housing Programs (OAHP), the Office of General Counsel (OGC) in Washington DC, and the Headquarters’ and Fort Worth Offices of Environment and Energy (OEE) to review the city’s contracts, Requests for Release of Funds (RROF) and the Authority to Use Grant Funds (AUGF) to determine whether the environmental violations were regulatory or

statutory. The final decision was made by HUD's OGC. HUD will require the city to repay the HOME account for any violation that is determined to be statutory. A summary determination for each project is included below.

Builders of Hope – Prairie Creek – Phase Three

The City of Dallas signed an agreement with Builders of Hope for HOME funds for construction of 16 single family homes on September 10, 2014. HUD received the Request for Release of Funds December 8, 2014. Section 288(b) of the HOME Investment Partnerships Act states: "The Secretary shall approve the release of funds subject to the procedures authorized by this section only if, at least 15 days prior to such approval and prior to any commitment of funds to such projects the jurisdiction or insular area has submitted to the Secretary a request for such release accompanied by a certification which meets the requirements of subsection (c)," (certifying compliance with NEPA). 42 USC 12838(b). This is a statutory violation since the city committed HOME funds before submission of the RROF and subsequent approval of the AUGF.

It is also in violation of HUD's HOME regulations at 24 CFR 92.352(b) and environmental review regulations at 24 CFR 58.22(a). Both state that no funds may be committed until completion of the environmental review and approval of the request for release of funds and related certification.

Finally, CPD has issued clear guidance on environmental review for HOME projects (Notice CPD-01-11). In the Introduction, in Section I.B, Policy, it states (all emphasis in original):

Completion of the environmental review process is mandatory before taking a physical action on a site or making a commitment or expenditure of HUD or non-HUD funds for property acquisition, rehabilitation, conversion, lease, repair or construction activities. "Non-HUD funds" means any other Federal, state, local, private, or other funds. Further, participating jurisdictions, insular areas, state recipients, and subrecipients, may not commit HOME funds until HUD or the state has approved the Request for Release of Funds and related certification (RROF) unless the activity has been determined exempt in accordance with 24 CFR §58.34 and §58.35(b). Contractors, owners and developers (including Community Housing Development Organizations) may not commit or expend funds on HOME projects until the participating jurisdiction or state recipient has completed the environmental review process as defined below in Sections II and III.

The Notice does allow for a commitment of HOME assistance conditioned upon the subsequent completion of the environmental review process. Section IV.C. The Notice states that the following language is acceptable:

Notwithstanding any provision of this Agreement, the parties hereto agree and acknowledge that this Agreement does not constitute a commitment of funds or site approval, and that such commitment of funds or approval may occur only upon satisfactory completion of environmental review and receipt by [the participating jurisdictions, insular area or state recipient] of a release of funds from the U.S. Department of Housing and Urban Development [or the State of.....] under 24 CFR

Part §58. The parties further agree that the provision of any funds to the project is conditioned on the [participating jurisdiction, insular area or state recipient's] determination to proceed with, modify or cancel the project based on the results of a subsequent environmental review.

None of the agreements signed by the City of Dallas before submission of the RROF contained this language or other language conditioning the use of the funds upon completion of the environmental review.

Innercity Community Development Corporation - Pittman – Final Phase

The City of Dallas signed an agreement with ICDC for \$415,898 in HOME funds for Pittman Final Phase for the construction of six single family homes on July 1, 2015. HUD did not receive the RROF until July 14, 2014. For the reasons explained above for Builders of Hope, this is also a statutory violation of the HOME Investment Partnerships Act. Similarly, it also violates the HUD regulations 24 CFR 92.352(b) and 24 CFR 58.22(a). The agreement also does not conform to Notice CPD-01-11 and/or include language conditioning the provision of HOME funds on subsequent completion of environmental review.

Innercity Community Development Corporation - Scattered Sites 5 and Scattered Sites 6

A Loan Agreement between the City of Dallas and the South Dallas Fair Park Inner City Community Development Corporation for \$320,000.00 in HOME Investment Partnership Program funds was signed on August 20, 2015, for the construction of five single family homes on the following scattered sites: 3727 Meadow; 3530 Dunbar; 2618 Marburg; 2715 Birmingham; and 3021 Birmingham. The Request for Release of Funds for these five properties was submitted to HUD on November 24, 2015, and the Authority to Use Grant Funds was signed December 10, 2015.

Section 288(b) of the HOME Investment Partnerships Act states: “The Secretary shall approve the release of funds subject to the procedures authorized by this section only if, at least 15 days prior to such approval and prior to any commitment of funds to such projects the jurisdiction or insular area has submitted to the Secretary a request for such release accompanied by a certification which meets the requirements of subsection (c),” (certifying compliance with NEPA). 42 USC 12838(b). Committing HOME funds for construction of these five houses before submission of the RROF is a statutory violation.

The Loan Agreements signed by the City on August 20, 2015 before submission of the RROF did not contain this language or other language conditioning the use of the funds upon completion of the environmental review.

On November 7, 2017, the City and ICDC signed the First Amendment to the earlier Loan Agreement. The Amendment added six more units to be developed and increased the amount of HOME Investment Partnership Program funds to \$1,220,000.00. The six additional sites are located at: 4015 Metropolitan; 4339 Metropolitan; 3810 Carl; 4000 Metropolitan; 3803 Metropolitan; and 3709 Carl.

A Request for Release of Funds for these six locations was submitted to HUD on March 5, 2018, after the City committed funds to these sites by signing the First

Amendment. For the reasons explained above, the entire amount of \$1,220,000.00 in HOME funds for all eleven project sites was committed in violation of the HOME Investment Partnerships Act (42 USC 12838(b)); HUD's HOME program regulations (24 CFR 92.352(b)); and HUD's environmental review regulations (24 CFR 58.22(a)); and in contravention of CPD guidance (Notice CPD-01-11).

East Dallas Community Organization Scattered Sites

On April 18, 2017, the City of Dallas and East Dallas Community Organization entered into a Loan Agreement for \$707,208.00 in HOME Investment Partnership Program funds and Neighborhood Stabilization Program funds for the construction of 10 single family homes at the following locations: 2404 Macon; 4508 Philip; 1115 Claude; 4922 Gurley; 4936 Gurley; 2410 Starks; 4523 Philip; 4902 Gurley; 4942 Gurley; and 1449 Barry. The Loan Agreement signed by the city was not conditioned upon completion of the environmental review.

The city had previously submitted an RROF to HUD for seven properties on February 14, 2017: 4508 Philip; 4523 Philip; 1109 Claude; 1115 Claude; 2404 Macon; 2410 Starks; and 1449 Barry. (Only six of these are listed in the Loan Agreement; 1109 Claude is not listed in Exhibit K.)

The AUGF was issued on March 2, 2017 for these seven properties for \$440,026.20 in HOME funds and \$55,020.00 in NSP 1 funds. The April 18, 2017 commitment of funds complies with the HOME statute requirements regarding these seven properties.

On October 16, 2017, the City submitted an RROF to HUD for the four remaining properties listed in the April 2017 Loan Agreement: 4902 Gurley; 4922 Gurley; 4936 Gurley; and 4942 Gurley. The AUGF for these four properties was issued November 1, 2017 for \$251,440 in HOME funds. Because the RROF was submitted after the Loan Agreement, the City committed the funds for these four locations in violation of the HOME Investment Partnerships Act (42 USC 12838(b)); HUD's HOME program regulations (24 CFR 92.352(b)); and HUD's environmental review regulations (24 CFR 58.22(a)); and in contravention of CPD guidance (Notice CPD-01-11). According to IDIS, the city expended \$353,968.70 of HOME funds for the Gurley Avenue properties, which was determined to be a statutory violation.

CPD Management Decision:

- A. The city must repay \$1,603,576.96 from non-Federal funds to the HOME program account for the projects that had a statutory violation of the environmental requirements under 24 CFR 58.22. These include: (1) Builders of Hope – Prairie Creek Phase 3 (\$629,940); (2) ICDC Scattered Sites (\$286,775.47); ICDC Pittman Final Phase (\$353,968.70); and, ECDO Scattered Sites – Gurley Avenue Properties (\$332,892.79).
- B. The city must provide the Fort Worth Field Office the complete environmental review records for the EDCO seven scattered-site properties within 30 days of the

date of this letter (AUGF signed 3/2/2017). The city must also provide our office an assurance that these are the original records.

- C. The city must provide the Fort Worth Field Office documentation to support that no funds were expended prior to the date of the executed AUGF (3/2/2017) for each of the seven properties referenced in 1B above. Please provide the documentation within 30 days from the date of this letter.
- D. The city must deobligate and reprogram the unexpended HOME fund balances for the EDCO scattered-site and ICDC scattered-site projects. The city must provide the Fort Worth Field Office documentation that it followed the citizen participation requirements within 60 days from the date of this letter.
- E. The city must provide the Fort Worth CPD Office an assurance that it will not provide additional Federal funds to any of the projects identified in this Finding.
- F. The city must submit to the Fort Worth Field Office a final approved comprehensive environmental review policy and procedure for all HUD/CPD funded projects within 60 days. At a minimum, the policy must identify the city department/staff responsible for conducting reviews; coordination efforts with other city departments to identify projects; coordination efforts with project sponsors, CHDOs, CBDO, subrecipients; and other entities that receive HUD/CPD funds to ensure reviews are completed prior to committing funds; documentation requirements; location of documents; on-going staff training; and management review/approval of reviews. The submission must include an organizational chart and an environmental review process flow chart.
- G. The city must provide the Fort Worth Field Office an assurance that it will utilize the HUD Environmental Review Online System (HEROS) to submit and manage all HUD/CPD environmental review records within 30 days.
- H. The city must submit to the Fort Worth Field Office contract language that complies with 58.22 (d) and (f) for review and approval within 30 days and an assurance that it will incorporate this language in HUD/CPD contracts, when it is applicable. Please refer to Notice CPD-01-11, Section IV.C cited above.
- I. The city must submit the complete environmental review record and AUGF to the Regional Environmental Officer for the next three CHDO projects.

Finding 2: The city did not effectively manage its Community Housing Development Organizations.

OIG Recommendations:

- A. Support or repay \$1,959,913 from non-Federal funds to the City's Community Development Block Grant (CDBG) program for funds expended for Serenity Place Apartments because the city could not locate any of the project files.

- B. Support or repay \$1,402,875 from non-Federal funds to the City's HOME program for CHDO draws paid with no supporting documentation.
- C. Support or repay \$80,842 in program income from non-Federal funds to the City's HOME program.
- D. Repay \$105 in ineligible costs to the City's HOME program.
- E. Strengthen and comply with its underwriting and project evaluation policies and procedures, including ensuring that when it signs and commit funds, project construction can begin within 12 months.
- F. Develop and implement policies and procedures on documentation required to support draws.
- G. Comply with requirements to obtain the required income documentation, including employees know and apply the requirements.
- H. Develop and implement policies and procedures to review source income documentation as required by the HOME regulations.
- I. Develop and implement policies and procedures for documenting the results of the recertification procedures, including documenting the results of unpaid taxes, the resolution of audit findings, and the resolution of ineligible CHDO board members or employees because of a SAM search.

In Table 2 below, CPD identifies the Community Development Block Grant (CDBG) project, City Wide Community Development Corporation, Serenity Place Apartments, which was included in the OIG report. According to the OIG Report, the city could not locate any records for this CDBG-funded project. Subsequently, the Serenity contracts and AUGF was provided to this office. OGC has since determined that the city did not commit a statutory violation of the environmental requirements. However, OIG could not determine if the city maintained documentation to support the eligibility of this project or the CDBG costs associated with construction. The city must provide the support documentation outlined in CPD Management Decisions 2A through D below within 30 days from the date of this letter.

Table 3 includes the HOME projects identified in Finding 2 of the OIG Report. The grant amounts identified in OIG's findings and recommendations may differ from the amounts included in CPD's management decisions because CPD used the amounts funded and drawn from HUD's Integrand Disbursement and Information System (IDIS), as of October 30, 2019. Also, HOME projects that were determined to violate a statutory violation of the environmental requirements are noted in Table 3. CPD will not require the city to submit supporting documentation for those projects since they are subject to repayment.

Table 2 City of Dallas OIG Finding #2 Summary of CDBG Activity					
Project	Amount Questioned by OIG	IDIS Activity Number	Funds Committed	Amount Funded per IDIS	Amount Drawn per IDIS
Citywide CDC – Serenity Place	\$1,959,913	11970	CDBG	\$1,744,142	\$1,744,142

Table 3 City of Dallas OIG Finding #2 Summary of HOME CHDO Activities						
CHDO	Project Name	Amount Questioned by OIG	IDIS Activity Number	Amount Funded per IDIS	Amount Drawn per IDIS	Advance per OIG
EDCO	Bexar Street Seniors	\$188,545	12304	\$203,058.69	\$203,058.69	\$150,000
EDCO	Townhomes	\$150,000	12423	\$198,255.60	\$198,255.60	\$150,000
ICDC	Frank Street	\$416,108.50	12612	\$567,898.50	\$567,898.50	\$227,099
Citywide CDC	Runyon Springs	\$295,295	12297	\$340,000	\$315,294.87	NA
SouthFair	Six Lots	\$346,296	12302	\$767,094.50	\$652,427.50	\$72,000
Builders of Hope	Toplez III	\$5,656	12047	\$675,485.83	\$675,485.83	
Total Amounts		\$1,401,901		\$2,751,793.12	\$2,612,420.99	\$599,099

CPD Management Decisions:

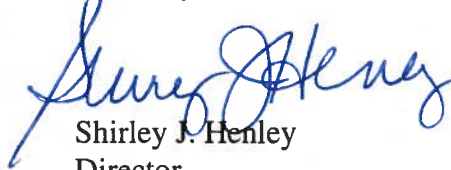
- A. The city must provide the Fort Worth Field Office documentation to support each of the drawdowns listed in Attachment A, Serenity Place CDBG Drawdowns by Voucher Number and identified in Table 2 in the amount of \$1,744,142.
- B. The city must provide the Fort Worth Field Office documentation to support that the Serenity Place project meets the eligibility requirements under 24 CFR 570.204.
- C. The city must provide the Fort Worth Field Office the complete environmental review records for the Citywide Serenity Place project within 30 days. The city must also provide our office an assurance that these are the original records.

- D. The city must provide the Fort Worth Field Office documentation to support that no Federal funds were expended prior to the date of the executed AUGF for the City-Wide Serenity Place project.
- E. The city must provide the Fort Worth Field Office documentation to support each of the drawdowns listed in Exhibit B, CHDO Drawdowns by Voucher Number and identified in Table 3.
- F. The city must provide the Fort Worth Field Office documentation to account for program income of \$120,204 generated by Builders of Hope and \$59,847 generated by Citywide identified in Appendix D of the OIG report.
- G. The city must provide the Fort Worth Field Office documentation that it reimbursed the HOME program account for \$105 from non-Federal funds for the Runyon Springs CHDO activity.
- H. The city must provide the Fort Worth Field Office a written assurance that it has reviewed its underwriting and project evaluation policies and procedures to ensure that they comply with the HOME program requirements at 24 CFR 92.250 and 922.254 and CPD Notice 15-11, Requirements for the Development and Implementation of HOME Underwriting and Subsidy Layering Guidelines. In addition, the city must provide a written assurance that it will follow its underwriting policies and procedures within 60 days from the date of this letter.
- I. The city must develop and implement policies and procedures for obtaining, submitting, reviewing and approving documentation to support HOME program draws. The city must also develop and implement a policy and procedure for making cash advances. The city must submit its approved policies and procedures within 60 days to this office.
- J. The city must provide the Fort Worth Field Office a written assurance that it has reviewed its policies and procedures for obtaining, reviewing and documenting income for compliance with 24 CFR 92.203 and 92.508. In addition, the city must provide a written assurance that it will train its employees and CHDO staff on the policies and procedures within 60 days of submission of the policy and procedure identified in I above.
- K. The city must develop and implement policies and procedures for documenting the results of the CHDO recertification procedures, including but not limited to documenting the results of unpaid taxes, the resolution of audit findings, and SAM searches. The city must submit its approved policy and procedure within 60 days to this office.

- L. The city must provide the Fort Worth Field Office a written assurance that it has conducted a SAM search for all current CHDOs, including principal staff and board members and that there are no active exclusions listed. Please provide the assurance and a summary report for each CHDO within 30 days.

Jerry Jensen, Program Manager will be the primary point of contact to resolve each of the management decisions identified in this letter. We would like to meet with city management and staff at your earliest convenience to discuss the corrective actions, timeframes, and coordination for submission and review of documentation. We will contact the city to set up the meeting. You may contact Mr. Jensen at (817) 978-5940 or via email at gerald.r.jensen@hud.gov oif you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shirley J. Henley".

Shirley J. Henley
Director

Enclosures

Attachment A
City Wide -Serenity Place
CDBG Drawdowns by Voucher Number

IDIS Voucher #	Line Item #	Creation Date	IDIS Activity Number	Grant Number	Activity Name	Line Item Status	Drawdown Amount
5783983	3	2/25/2015	11970	B13MC480009	CWCDC - Serenity Project (CBDO)	Completed	\$380,861.14
5820554	3	6/18/2015	11970	B13MC480009	CWCDC - Serenity Project (CBDO)	Completed	\$825,113.99
5831156	1	7/22/2015	11970	B13MC480009	CWCDC - Serenity Project (CBDO)	Completed	\$355,164.16
5897722	1	2/18/2016	11970	B14MC480009	CWCDC - Serenity Project (CBDO)	Completed	<u>\$183,002.71</u>
Total							\$1,744,142.00

Attachment B

CHDO Drawdowns by Voucher Number

EDCO Bexar Street Seniors

IDIS Activity # 12304

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>
	5843887	1	9/1/2015	12304 M09MC480203	EDCO - Bexar Seniors (HM)	Completed	\$1,486.84
	5846878	1	9/11/2015	12304 M09MC480203	EDCO - Bexar Seniors (HM)	Completed	\$1,410.91
	5857510	1	10/14/2015	12304 M09MC480203	EDCO - Bexar Seniors (HM)	Completed	\$254.03
	5869131	10	11/18/2015	12304 M15MC480203	EDCO - Bexar Seniors (HM)	Completed	\$50.00
	5878172	2	12/16/2015	12304 M15MC480203	EDCO - Bexar Seniors (HM)	Completed	\$7,560.00
	5890892	1	1/28/2016	12304 M09MC480203	EDCO - Bexar Seniors (HM)	Completed	\$7,500.00
	5945983	6	7/19/2016	12304 M15MC480203	EDCO - Bexar Seniors (HM)	Completed	\$1,827.50
	5982294	1	11/10/2016	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$362.50
	5986276	1	11/23/2016	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$3,305.00
	6003098	11	1/19/2017	12304 M16MC480203	EDCO - Bexar Seniors (HM)	Completed	\$3,305.00
	6019564	1	3/9/2017	12304 M16MC480203	EDCO - Bexar Seniors (HM)	Completed	\$1,726.66
	6029240	1	4/10/2017	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$9,907.50
	6030981	1	4/13/2017	12304 M16MC480203	EDCO - Bexar Seniors (HM)	Completed	\$345.00
	6063084	1	7/21/2017	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$5,625.00
	6068089	1	8/8/2017	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$8,938.00
	6077064	1	9/6/2017	12304 M12MC480203	EDCO - Bexar Seniors (HM)	Completed	\$146,396.06
	6120162	1	2/2/2018	12304 M13MC480203	EDCO - Bexar Seniors (HM)	Completed	\$1,225.00
	6214284	1	12/5/2018	12304 M14MC480203	EDCO - Bexar Seniors (HM)	Completed	<u>\$1,833.69</u>
Total							\$203,058.69

EDCO Town Homes

IDIS Activity # 12423

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>
	5904995	1	3/11/2016	12423 M15MC480203	EDCO - Townhomes Final Phase	Completed	\$22,398.12
	5910134	6	3/28/2016	12423 M15MC480203	EDCO - Townhomes Final Phase	Completed	\$7,205.73
	5950701	1	8/3/2016	12423 M09MC480203	EDCO - Townhomes Final Phase	Completed	\$2,025.00
	5965938	3	9/21/2016	12423 M09MC480203	EDCO - Townhomes Final Phase	Completed	\$3,467.16
	5965938	4	9/21/2016	12423 M12MC480203	EDCO - Townhomes Final Phase	Completed	\$6,207.84
	6069774	5	8/14/2017	12423 M13MC480203	EDCO - Townhomes Final Phase	Completed	\$4,638.00
	6072982	1	8/23/2017	12423 M12MC480203	EDCO - Townhomes Final Phase	Completed	\$124,648.81
	6072984	1	8/23/2017	12423 M13MC480203	EDCO - Townhomes Final Phase	Completed	\$25,351.19
	6079363	2	9/15/2017	12423 M11MC480203	EDCO - Townhomes Final Phase	Completed	<u>\$2,313.75</u>
Total							\$198,255.60

**ICDC Frant Street
IDIS Activity # 12612**

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>
6067572	1	8/4/2017	12612	M10MC480203	ICDC - FRANK ST PROJECT	Completed	\$73,610.35
6068080	1	8/8/2017	12612	M11MC480203	ICDC - FRANK ST PROJECT	Completed	\$20,849.40
6076815	1	9/6/2017	12612	M11MC480203	ICDC - FRANK ST PROJECT	Completed	\$42,649.60
6076815	2	9/6/2017	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$184,449.40
6095266	1	11/13/2017	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$15,944.00
6120164	1	2/2/2018	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$20,000.00
6158461	1	5/30/2018	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$21,058.20
6161325	1	6/8/2018	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$25,710.00
6195266	1	9/28/2018	12612	M12MC480203	ICDC - FRANK ST PROJECT	Completed	\$20,905.35
6212709	5	11/29/2018	12612	M14MC480203	ICDC - FRANK ST PROJECT	Completed	\$1,925.00
6246954	2	3/20/2019	12612	M15MC480203	ICDC - FRANK ST PROJECT	Completed	\$4,618.50
6298372	1	8/23/2019	12612	M15MC480203	ICDC - FRANK ST PROJECT	Completed	\$18,667.00
6307112	1	9/20/2019	12612	M14MC480203	ICDC - FRANK ST PROJECT	Completed	\$65,518.05
6309317	1	9/27/2019	12612	M14MC480203	ICDC - FRANK ST PROJECT	Completed	\$31,340.55
Total							\$547,245.40

**City Wide - Runyon Springs
IDIS Activity # 12297**

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>
5935628	1	6/16/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$27,535.00
5945983	9	7/19/2016	12297	M15MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$20,733.00
5947288	1	7/22/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$53,923.50
5957927	1	8/25/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$62,821.89
5963951	1	9/15/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$4,558.00
5966058	1	9/21/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$14,377.50
5974477	3	10/18/2016	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$20,474.71
5982146	1	11/9/2016	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$8,633.00
5982150	1	11/9/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$24,959.16
5984565	1	11/17/2016	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$3,244.11
6012232	6	2/15/2017	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$1,785.00
6017498	1	3/2/2017	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$15,477.50
6024673	11	3/27/2017	12297	M15MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$10,000.00
6029238	6	4/10/2017	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$31,725.00
6030981	2	4/13/2017	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$1,522.50
6075386	1	8/30/2017	12297	M16MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	\$10,000.00

	6161327	1	6/8/2018	12297	M12MC480203	CWCDC- RUNYON SPRINGS PROJEC	Completed	<u>\$3,525.00</u>
Total								\$315,294.87

**SouthFair - Six Lots
IDIS Activity # 12302**

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>	
	5869131	13	11/18/2015	12302	M15MC480203	Southfair- 6 Lots	Completed	\$5,166.63
	5945983	17	7/19/2016	12302	M11MC480203	Southfair- 6 Lots	Completed	\$2,500.00
	5957916	10	8/25/2016	12302	M12MC480203	Southfair- 6 Lots	Completed	\$760.00
	6017498	10	3/2/2017	12302	M12MC480203	Southfair- 6 Lots	Completed	\$4,500.00
	6024673	8	3/27/2017	12302	M12MC480203	Southfair- 6 Lots	Completed	\$24,000.00
	6069806	1	8/14/2017	12302	M13MC480203	Southfair- 6 Lots	Completed	\$72,000.00
	6115476	1	1/22/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$13,500.00
	6115686	1	1/22/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$3,073.37
	6139298	1	4/2/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$2,347.20
	6156424	1	5/23/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$29,640.25
	6195006	1	9/27/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$24,218.10
	6195077	1	9/27/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$14,326.80
	6195247	1	9/28/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$17,468.10
	6196509	1	10/3/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$64,579.36
	6212709	1	11/29/2018	12302	M14MC480203	Southfair- 6 Lots	Completed	\$24,427.50
	6220803	1	12/26/2018	12302	M15MC480203	Southfair- 6 Lots	Completed	\$312,081.98
	6244960	1	3/14/2019	12302	M15MC480203	Southfair- 6 Lots	Completed	\$33,878.50
	6263509	1	5/7/2019	12302	M15MC480203	Southfair- 6 Lots	Completed	<u>\$3,959.71</u>
Total								\$652,427.50

**Builders of Hope - Toplez III
IDIS Activity # 12047**

<u>IDIS Voucher #</u>	<u>Line Item #</u>	<u>Creation Date</u>	<u>IDIS Actv ID</u>	<u>Grant Number</u>	<u>Activity Name</u>	<u>Line Item Status</u>	<u>Drawdown Amount</u>	
	5925100	3	5/12/2016	12047	M15MC480203	BOH - TOPLETZ III (FINAL)	Completed	\$11,945.70
	5925360	1	5/12/2016	12047	M15MC480203	BOH - TOPLETZ III (FINAL)	Completed	<u>\$22,883.40</u>
Total								\$34,829.10