

REQUEST FOR PROPOSALS 2010-08

**HARDEST HIT FUND (HHF) PROGRAM
COMPLIANCE MONITORING SERVICES**

for

FLORIDA HOUSING FINANCE CORPORATION

July 23, 2010

SECTION ONE
INTRODUCTION

- A. On February 19, 2010, President Obama announced \$1.5 billion in funding called the Housing Finance Agency Innovation Fund for the Hardest-Hit Housing Markets (Hardest-Hit Fund) to help families in the five states that have been hit the hardest by the combination of housing price declines and unemployment. Of this \$1.5 billion, Florida was allocated \$418 million.

- B. Florida Housing proposed to the US Treasury (Treasury) a Mortgage Intervention Strategy designed to help unemployed or underemployed homeowners achieve the goal of sustainable homeownership by extending the time period for homeowners to become re-employed at a salary that is sufficient to either resume making full mortgage payments or qualify for a mortgage modification that will lower the payments and terms of the mortgage to an affordable level Treasury has given the Hardest-Hit Fund states the flexibility to modify or add additional strategies. Florida Housing may need to change or add additional provisions to the contract if pursuing additional strategies.

- C. Florida Housing Finance Corporation (Florida Housing) is soliciting competitive, sealed responses from qualified persons or entities to provide Hardest Hit Fund (HHF) Program services for Florida Housing in accordance with the terms and conditions set forth in this Request for Proposals (RFP), and any other term and condition in any contract subsequently awarded. Offerors shall be selected and determined through Florida Housing’s review of each response, considering the factors identified in this RFP and any other factors that it considers relevant to serving the best interests of Florida Housing and its mission. Florida Housing expects to engage the services of one or more qualified compliance monitors that propose to provide all of the services specified in this RFP throughout the state.

SECTION TWO
DEFINITIONS

For purposes of this document, the following terms shall be defined as follows:

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|----------------|---|
| “Board” | The Board of Directors of Florida Housing Finance Corporation. |
| “Client Files” | The files regarding HHF awards originated and serviced by Local Housing Counseling Agencies to eligible persons/households. |
| “Committee” | The review committee composed only of employees of Florida Housing that is established |

pursuant to Fla. Admin. Code, R. 67-49.007.

“Contract”	The document containing the terms and conditions of this Request for Proposals and any other term and condition that the parties agree to.
“Contractor”	A person or entity providing the professional services described in Section Four of this RFQ.
“Days”	Calendar days, unless otherwise specified.
“Effective Date”	The date the last party signs the Contract(s) that is (are) awarded as a result of this Request for Proposals.
“Florida Housing”	Florida Housing Finance Corporation, a public corporation and public body corporate and politic created by Section 420.504, Fla. Stat.
“Housing Finance Agency Innovation Fund for the Hardest- Hit Housing Markets “ or “Hardest-Hit Fund” or “HHF”	Federal funding program established in February 2010 under the Emergency Economic Stabilization Act of 2008 to provide targeted aid to families in the states hit hardest by the housing market downturn.
“Home Affordable Modification Program” or “HAMP”	Federal Mortgage modification program created by the U.S. Government under the Making Home Affordable Plan.
“Interested Party”	A person or entity that obtains a copy of the Request for Proposals from Florida Housing.
“Local Housing Counseling Agency”	Organizations that perform housing counseling services under contract with Florida Housing who responded to RFQ 2010-07 for the Mortgage Intervention Strategy of the Hardest Hit Fund Program.
“Mortgage Intervention Strategy” or “MIS”	Florida Housing’s U.S. Treasury approved HFA Hardest-Hit Fund Strategy.

“Monitoring Agent”	The Offeror(s) awarded a Contract by Florida Housing to provide the compliance monitoring services described in Section Four of this RFP.
“Offeror”	Any person or entity who has the capability in all respects to perform fully the requirements contained in this Request for Proposals and submits a response to this Request for Proposals.
“Response”	The written submission by an Offeror to this Request for Proposals.
“Review”	Consists of Items A. and B. of Section Four of this RFP.
“RFP”	This Request for Proposals, including all exhibits referenced in this document and all other documents incorporated by reference.
“Sample”	Those Local Housing Counseling Agencies, Recipient Files, or physical properties selected in accordance with the Work Plan.
“Staff”	Any employee of Florida Housing, including the Executive Director.
“Threshold Item”	A mandatory requirement of the RFP. Failure to meet any requirement in the RFP designated as a “Threshold Item” shall result in rejection (no further action) of a Response.
“Website”	The Florida Housing Finance Corporation website. The Universal Resource Locator (URL) of which is www.floridahousing.org

SECTION THREE
PROCEDURES AND PROVISIONS

A. An Offeror must submit an original and five (5) copies of the Response in a sealed envelope marked “RFP 2010-08.” In addition, a copy of the Response in an electronic format must be submitted on a compact disc at the time of submission. Each envelope or package containing Responses must clearly state the name of the Offeror. The Response that is the original must clearly indicate “Original” on that Response. Florida Housing shall not accept a faxed or e-mailed Response. Florida Housing must

receive any Responses on or before 2:00 p.m., Eastern Time, on Friday, August 13, 2010. Responses shall be opened at that time. Responses must be addressed to:

Sherry Green
Contracts Administrator
Florida Housing Finance Corporation
227 North Bronough Street, Suite 5000
Tallahassee, FL 32301-1329
(850) 488-4197; Fax (850) 414-6548
Email: sherry.green@floridahousing.org

B. This RFP does not commit Florida Housing to award a Contract to any Offeror or to pay any costs incurred in the preparation or mailing of a Response.

C. All services under the Contract awarded are to be performed solely by the contractor, and may not be subcontracted or assigned without the prior written approval and consent of Florida Housing.

D. Florida Housing reserves the right to:

1. Waive minor deficiencies and informalities;
2. Accept or reject any or all Responses received as a result of this RFP;
3. Obtain information concerning any or all Offerors from any source;
4. Schedule an oral interview before the Committee and/or the Board from any or all Offerors;
5. Select for Contract negotiation or for award, a Response other than that with the highest score if, in the judgment of Florida Housing, its and the public's interest shall be best served; and
6. Negotiate with the successful Offeror(s) with respect to any additional terms or conditions, including the fees, prior to entering into the Contract.

E. Any Interested Party may submit any question regarding this RFP in writing via mail, fax, or e-mail to Sherry Green at the address given in Section Three, paragraph A. All questions are due by 5:00 p.m., Eastern Time, on Friday, July 30, 2010. Phone calls shall not be accepted. Florida Housing expects to respond to all questions by 5:00 p.m., Eastern Time, on Wednesday, August 4, 2010. Florida Housing shall post a copy of all questions received and their answers on Florida Housing's Website at:

<http://www.floridahousing.org/Home/BusinessLegal/Solicitations/RequestForProposals.htm>.

Florida Housing shall also send a copy of those questions and answers in writing to any Interested Party that requests a copy. Florida Housing shall determine the method of

sending its answers, which may include regular U.S. mail, overnight delivery, fax, e-mail or any combination of the above. Only written responses or statements from Sherry Green or her designee that are posted on the Website shall bind Florida Housing. No other means of communication, whether oral or written, shall be construed as an official response or statement from Florida Housing.

F. Any person who wishes to protest the contents of this RFP or other specifications, including addenda, must file a protest in compliance with Section 120.57(3), Fla. Stat., and Fla. Admin. Code R. 28-110. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

G. The term of the Contract shall be for five (5) years or as long as there are funds available and contingent upon satisfactory performance evaluations by Florida Housing.

SECTION FOUR **SCOPE OF SERVICES**

Review of HHF Mortgage Intervention Strategy Implementation by Local Housing Counseling Agencies:

The Review of Local Housing Counseling Agencies' Client Files and management procedures shall be completed through a desk or on-site Review as directed by Florida Housing. Florida Housing requires the Review of no less than the minimum number of HHF Client Files as stated in the Work Plan (Exhibit A which may be amended from time to time.

A. **Review of HHF Client Files**

1. Review of Client Files to determine that sufficient documentation is included;

When applicable, Client File documentation shall include, but is not limited to, the following:

- a. Application;
- b. Property Deed;
- c. Real Estate Tax Information (if not escrowed);
- d. Homeowner's Letter of Circumstance;
- e. Verification of Circumstances (layoff notice, letter from doctor, receipts, etc.);
- f. Client Information Release Authorization Form
- g. Mortgage Verification;
- h. Deposit/Loan Verification;
- i. Income Verification (paystubs, checks, income statements);

- j. Federal Income Tax Returns (last 3 years);
 - j. Monthly Statements of Charge Accounts and Loans;
 - k. Foreclosure Notice (if filed);
 - l. Homeowner's Insurance policy;
 - m. Bankruptcy Information (if applicable);
 - n. Credit Report;
 - o. Other Documentation;
 - p. Verify compliance with Dodd/Frank Act regarding criminal history.
 - q. Counselor recommendation based on facts provided.
2. Verification of homeowner eligibility, including verification of income or lack thereof;
 3. Verification that individual mortgages do not exceed the maximum allowable amount for the county;
 4. Verification that mortgage expenditures do not exceed the stated required payments;
 5. Verification of whether the applicant was ever able to afford the home in question;
 6. Recalculation of:
 - a. current loan-to-value;
 - b. level of consumer debt;
 - c. number of months in arrears; and
 - d. any other items to help determine whether sustainable homeownership is a realistic goal for the applicant; and
 7. Determination that award limits were not exceeded.

B. Review of HHF Program Management Practices:

1. Review of written procedures regarding all program processes, including intake, screening, approvals and denials;
2. Review of service providers' record keeping including tracing a sample of reported items to supporting documentation and vice versa;

C. Written Report of Findings for the HHF Program

The Monitoring Agent shall conduct a desk or on-site Review as directed by Florida Housing and electronically submit to the Local Housing Counseling Agency and to Florida Housing a written report regarding HHF Program compliance, and advise the Local Housing Counseling Agency at the exit interview of all findings noted during the Review known at that time. The Monitoring Agent shall provide the report to the Local Housing Counseling

Agency and Florida Housing on or before fifteen (15) business Days from the completion date. The written report shall specify a due date that is thirty (30) Days from the date of the report for written response from the Local Housing Counseling Agency. The response shall be required to address each report finding. The Local Housing Counseling Agency shall have a sixty (60) Day remedial period to implement corrective action on any and all findings from the date of the written report.

D. Follow-up Reviews/Written Report for the HHF Program

Based on the quantity and nature of the errors found in a Review and on the adequacy of the response, a follow-up desk or on-site Review may be required by Florida Housing at any time.

1. This Review may consist of re-examining previously reviewed files to ensure required corrections were made and/or to Review additional files to determine whether proper procedures have been implemented and adhered to in addition to any items required to be reviewed by Florida Housing.
2. In cases where it appears that there is a pattern of violation of criteria, Florida Housing may request additional follow-up Reviews.

E. Additional Miscellaneous Duties of the Monitoring Agent

1. Advising Florida Housing of regularly scheduled monitoring activity, of any problems or changes, and returning phone calls to Florida Housing by 5:00 p.m. Eastern Time the next business Day.
2. Instructing Local Housing Counseling Agency personnel on compliance requirements during the HHF Program Review or as deemed necessary by Florida Housing.
3. Attending Florida Housing meetings, conferences and workshops as needed and determined by Florida Housing.
4. Conducting, upon request of Florida Housing, investigations of complaints. Within fifteen (15) Days of notification by Florida Housing, conduct initial investigation and verbally report to Florida Housing. A final investigation and written report to Florida Housing is due on or before forty-five (45) Days from the request date determining whether the Local Housing Counseling Agency has violated program criteria.
5. Coordinating with the technical assistance provider under contract with Florida Housing pursuant to Section 420.606, Fla. Stat.

SECTION FIVE
CERTIFICATION

Do not reproduce the language of Section Five in the Response. By inclusion and execution of the statement provided in this Section each Offeror certifies that:

A. The Offeror submits this Response without prior understanding, agreement, or connection with any person or entity submitting a separate Response for the same services. However, any agreement with a person or entity with whom the Response is jointly filed and such joint filing is made clear on the face of the Response shall be an exception so long as the Response is in all respects fair and without collusion or fraud.

B. Any material submitted in response to this RFP is a public record pursuant to Chapter 119, Fla. Stat., and subject to examination upon request, after Florida Housing provides a notice of decision pursuant to Section 120.57(3), Fla. Stat., or within 10 Days after the Response is opened, whichever is earlier.

C. The Offeror is in compliance with Section 420.512(5), Fla. Stat., which provides:

“Service providers shall comply with the following standards of conduct as a condition of eligibility to be considered or retained to provide services. For purposes of paragraphs (a), (b), and (c) only, the term ‘service provider’ means and is limited to a law firm, an investment bank, or a credit underwriter, and the agents, officers, principals, and professional employees of the service provider.

(a) A service provider may not make contributions in any amounts, directly or indirectly, for or on behalf of candidates for Governor, nor shall any service provider make a contribution in excess of \$100 to any candidate for a member of the State Board of Administration other than the Governor in Florida while the service provider is included in an applicant pool from which service providers are selected to provide services to the corporation, while the service provider provides services to the corporation, and for the longer of a period of 2 years thereafter or for a period through the next general election for Governor.

(b) The service provider shall not participate in fundraising activities for or on behalf of candidates for Governor in Florida while the service provider is included in an applicant pool from which service providers are selected to provide services to the corporation, while the service provider provides services to the corporation, and for the longer of a period of 2 years thereafter or for a period through the next general election for Governor.

(c) Service providers shall provide to the corporation a statement that the service provider has not contributed to candidates for Governor or contributed in excess of the amounts allowed by this section for a member of the State Board of Administration or engaged in fundraising activities for or on behalf of candidates for Governor in Florida since the effective date of this section or during the 24 months preceding the service provider's application to provide services to the

corporation, whichever period is shorter.

(d) The service provider may not engage in prohibited business solicitation communications with officers, members, or covered employees of the corporation.

(e) If a service provider is in doubt as to whether its activities, or the activities of its principals, agents, or employees, violate the provisions of this section, it may request a declaratory statement in accordance with the applicable rule and Section 120.565, Fla. Stat.

(f) If the corporation determines that a service provider has failed to meet the provisions of this section, it shall consider the magnitude of the violation and whether there has been a pattern of violations in determining whether to terminate or decline to enter into Contracts with the service provider.”

D. For the purpose of Section 420.512(5), Fla. Stat., “Prohibited Business Solicitation Communications” is defined by Section 420.503(31), Fla. Stat., which provides:

“‘Prohibited business solicitation communication’ means a private written or verbal communication between a member, officer, or covered employee of the corporation and a service provider regarding the merits of the service provider and whether the corporation should retain the services of the service provider.

The term does not include:

- (a) A verbal communication made on the record during a public meeting;
- (b) A written communication provided to each member and officer of the corporation and made part of the record at a public meeting;
- (c) A written proposal or statement of qualifications submitted to the corporation in response to a corporation advertisement seeking proposals or statements of qualifications as part of a competitive selection process.
- (d) A verbal or written communication related to the contractual responsibilities of a service provider who was selected to provide services or who was included in a pool of service providers eligible to provide services as a result of a competitive selection process, so long as the communication does not relate to solicitation of business.
- (e) A verbal or written communication related to a proposed method of financing or proposed projects, so long as the communication does not relate to solicitation of business.”

E. The Offeror is in compliance with Section 287.133(2)(a), Fla. Stat., which provides in part:

A person or affiliate, who has been placed on the convicted vendor list, following a conviction for a public entity crime, may not:

- a. submit a bid on a contract to provide any goods or services to a public entity;
- b. submit a bid on a contract with a public entity for the construction or repair

of a public building or public work;

c. submit bids on leases of real property to a public entity;

d. be awarded or perform work as a contractor, supplier, subcontractor, or consultant under a contract with any public entity, and;

e. transact business with any public entity in excess of the threshold amount provided in Section 287.017, Fla. Stat., for CATEGORY TWO: \$25,000, for a period of 36 months from the date of being placed on the convicted vendor list.

F. The Offeror acknowledges that any Offeror selected shall be prohibited from engaging in activities in connection with services related to Florida Housing transactions that produce direct or indirect financial gain for the Offeror other than the compensation agreed upon in the Contract that results from this RFP, unless that Offeror has written consent from Florida Housing's Executive Director after Florida Housing has been fully informed of such activities in writing.

G. In addition to the conflict of interest rules imposed by the Florida Statutes, the Offeror(s) that is (are) selected to provide these services may not engage in any actual, apparent, or potential conflict of interest. Should any such actual apparent, or potential conflict of interest come into being subsequent to the effective date of the Contract and prior to the conclusion of the Contract, the Offeror shall provide notification (Notice of Conflict of Interest) to Florida Housing, through first class certified mail, return receipt requested, within 10 working days, seeking written consent from Florida Housing's Executive Director. If the Offeror is found to be in non-compliance with this provision, without written consent from Florida Housing's Executive Director, any compensation received in connection with the Contract shall be subject to forfeiture to Florida Housing.

H. Certification Statement

THE FOLLOWING SHALL BE REPEATED IN THE APPLICANT'S RESPONSE AND SIGNED BY AN INDIVIDUAL AUTHORIZED TO BIND THE APPLICANT. FAILURE TO INCLUDE THE CERTIFICATION STATEMENT BEARING AN ORIGINAL SIGNATURE SHALL RESULT IN REJECTION OF THE RESPONSE.

“I agree to abide by all conditions of RFP 2010-08 and certify that all information provided in this Response is true and correct, that I am authorized to sign this Response as the Applicant and that I am in compliance with all requirements of the RFP, including but not limited to, the certification requirements stated in Section Five of this RFP.”

Authorized Signature (Original)

Print Name and Title

SECTION SIX
INFORMATION TO BE PROVIDED IN RESPONSE

A. COVER LETTER

Each proposal must be accompanied by a cover letter that contains a general statement of the purpose of submission and includes the following information. Failure to provide this information shall result in rejection of the Response.

1. The name, job title, address, office and cellular telephone numbers, fax number, and e-mail address of a primary contact person, who will be responsible for day-to-day contact with Florida Housing, and any backup personnel who would be accessible if the primary contact cannot be reached.
2. Legal business status (individual, partnership, corporation, etc.) and address and telephone number of the Offeror.

B. GENERAL INFORMATION

In providing the following information, restate each item and sub-item (with its letter and number), limit your Response to one bound volume. Responses to the items must be included immediately after the restated items without any reference to any appendix.

1. Provide a brief history of the Offeror, including the year organized, ownership, and the total number of employees, and the total number of employees who will be providing monitoring agent services.
2. Describe the Offeror’s ability to provide the services requested in Section Four of this RFP immediately upon award of the Contract.

3. Provide proof of current professional liability errors and omissions insurance to include the following:

Name of carrier and policy number;
Effective date of insurance;
Policy exclusions, if any;
Current coverage amounts;
Staff covered; and
Type of coverage.

4. Provide a statement of any other qualifications or services, which the Offeror considers to be significant, innovative or otherwise relevant to Florida Housing.
5. Provide evidence of certification that the Offeror is qualified to do business in the State of Florida.

C. EXPERIENCE/QUALIFICATIONS

1. Describe the Offeror's experience in housing finance and applying income guidelines of state, federal and local affordable housing programs. Information regarding the length of service and a detailed, specific description of past experience and responsibilities of the Offeror for each area listed in Section Four of this RFP.
2. Provide the qualification of individuals to be assigned to this account. The proposal must also include a copy of the Offeror's organizational chart. The individuals who shall be assigned to this account must be designated in writing. Resumes of all individuals (including education, employment history and professional certifications) that will perform compliance monitoring services under this RFP.,

D. MONITORING PLAN

The monitoring plan, which defines how the monitoring services will be accomplished, must include and describe the following:

1. The monitoring plan must provide sufficient detail to identify and describe the specific tasks to be undertaken and the method the Offeror proposes to apply in completing the tasks.

2. The maximum number of Reviews the Offeror can perform in a calendar year. This shall be described as the total number of days available for on-site visits, desk Reviews and report filing.

E. FEES

Fees shall be proposed by the Offeror on a per file basis for desk Reviews; and an additional fee per on-site visit/Review. All fees shall be negotiable and subject to approval by Florida Housing.

F. DRUG-FREE WORKPLACE

If the Offeror has implemented a drug-free workplace program, pursuant to Section 287.087, Fla. Stat., the Offeror must submit a valid affidavit to demonstrate its status.

G. MINORITY BUSINESS ENTERPRISE

If the Offeror is a minority business enterprise as defined in Section 288.703, Fla. Stat., the Offeror must submit a valid affidavit to demonstrate its status.

H. Certification (**Threshold Item**):

FAILURE TO INCLUDE THE CERTIFICATION STATEMENT LOCATED IN SECTION FIVE OF THIS RFP BEARING AN ORIGINAL SIGNATURE SHALL RESULT IN REJECTION OF THE RESPONSE.

SECTION SEVEN
EVALUATION PROCESS

Individual Committee members shall evaluate and rank the Responses independently. As indicated in this section, points shall be assigned to certain items presented in Section Six of this RFP. The individual Committee members shall evaluate the Responses by reviewing the answers to each of the items and assigning points up to the maximum points allowed for each item. The Committee shall not use those items without points assigned in computing the numerical score, but shall use them as part of their evaluation and recommendation process, for informational purposes, or as a basis for possible disqualification. The Committee shall also use the various scored items as a part of its evaluation and recommendation process. Based on the criteria for selection, committee members shall rank each Response with the highest rank being “1”. The Committee may conduct one or more public meetings during which members may discuss their evaluations, make any adjustments deemed necessary to their evaluations to best serve the interests of Florida Housing’s mission, interview Offerors, observe presentations by

Offerors, and develop a recommendation or series of recommendations to the Board. The Committee and/or Staff may make a recommendation, in addition to providing the ranking information and the information from the non-scored items to the Board for the Board to use in making the final selection. The Committee and/or Staff may also give the Board a written and/or verbal narrative describing the reasons for any recommendation. In the event of a tie, Florida Housing shall give preference to the Response certifying a drug-free workplace has been implemented in accordance with Section 287.087, Fla. Stat. If a tie continues to exist, Florida Housing shall give preference to minority business enterprises as defined in Section 288.703, Fla. Stat. Staff may recommend that the Board conduct oral interviews as part of the evaluation process to select the Offeror. The Board may use the Responses, the Committee’s ranking, the non-scored items in the Responses, any other applicable or relevant information or recommendation provided by the Committee or Staff, any oral presentations of Offerors and any other information the Board deems relevant in its selection of Offerors to whom to award a Contract.

The Board may use the Responses, the Committee’s scoring, the non-scored items in the Responses, any other applicable or relevant information or recommendation provided by the Committee or Staff, any oral presentations of Offerors and any other information the Board deems relevant in its selection of Offerors to whom to award a Contract.

<u>Section Six</u> <u>Item Reference</u>	<u>Maximum Points</u>
B. General Information (Items 1,2,& 4)	15
C. Experience/Qualifications (Items 1 & 2)	40
D. Monitoring Plan (Items 1 & 2)	45
Total Points Available	100

**SECTION EIGHT
AWARD PROCESS**

Florida Housing shall provide notice of its decision, or intended decision, for this RFP on Florida Housing’s Website the next business day after the applicable Board vote. After posting, an unsuccessful applicant may file a notice of protest and a formal written protest in accordance with Section 120.57(3), Fla. Stat., et. al. Failure to file a protest within the time prescribed in Section 120.57(3), Fla. Stat., et. al. or failure to post the bond or other security required by law within the time allowed for filing a bond shall constitute a waiver of proceedings under Chapter 120, Fla. Stat.

Exhibit A
Work Plan

- A. The initial desk Review shall be triggered once Florida Housing has confirmed a minimum of fifty (50) fully- completed applications submitted to a given Local Housing Counseling Agency. Florida Housing will select a sample of thirty (30) files to be reviewed from all completed applications whether accepted or rejected.
- B. The first annual desk Review shall take place approximately twelve (12) months after the initial desk Review. Florida Housing will select a Sample of between forty-five (45) and sixty (60) files to be reviewed, as follows:
 - a. fifteen (15) files of accepted or rejected completed applicant files,
 - b. thirty (30) files of approved “in-process” Client Files, and
 - c. up to fifteen (15) Client Files for individuals that have finished receiving financial assistance through the Program.
- C. The second annual desk Review shall take place approximately twenty-four (24) months after the initial desk Review. Florida Housing will select a Sample size of fifty (50) files to be reviewed, as follows:
 - a. five (5) files of accepted or rejected completed applicant files,
 - b. fifteen (15) files of approved “in-process” Client Files, and
 - c. thirty (30) Client Files for individuals that have finished receiving financial assistance through the program.
- D. Subsequent annual desk Reviews (if needed) shall follow the second annual desk Review in Sample size and scope.
- E. At Florida Housing’s discretion, follow-up Reviews may be required. Florida Housing will select a Sample of approximately one half of the size of the initial or annual Review, as applicable. The Sample may include a selection of files related to the findings from the prior Review.
- F. At Florida Housing’s discretion, on-site inspections may be required. Florida Housing will select a Sample commensurate in size and scope to the nature of the on-site inspection, and may require limited physical property confirmations.
- G. At Florida Housing’s discretion, investigative Reviews may be required. Florida Housing will select a Sample commensurate in size and scope to the nature of the investigative Review. It is expected that any investigative Reviews will be both few in number and in size.