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District Inspector General for Audit

December 21, 2001

Audit Memorandum
No. 2002-PH-1801

MEMORANDUM FOR: Joseph J. O'Connor, Director, Community Planning and Development, Maryland State Office, 3BD

for J. Phillip Griffin

FROM: Daniel G. Temme, District Inspector General for Audit, Mid-Atlantic, 3AGA

SUBJECT: City of Baltimore
HOME Program
Baltimore, Maryland

We completed a limited review of the City of Baltimore HOME Program. We performed the review to determine whether the City is administering its HOME Program in compliance with HUD requirements.

Generally, we found the City is administering its HOME Program in compliance with HUD requirements. However, we did identify a number of areas where the City needs to make improvements in its administration of the Program. Specifically, the City needs to better monitor HOME loans and prospective program income; improve its fiscal management of HOME administrative costs and matching funds requirements; and increase its surveillance over HOME Program activities to ensure program objectives are met, property condition standards in assisted rental housing units are met, and Community Housing Development Organizations are properly certified. Details of our review can be found under the "Results of Review" section of this memorandum.

BACKGROUND

HOME provides formula grants to States and localities that fund a wide range of activities that build, buy and/or rehabilitate affordable housing for rent or home ownership or provide direct rental assistance to low-income people. HOME funds are allocated based on a formula to eligible State and local governments to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing for very low-income families. HOME recipients are required to reserve at least 15 percent of their allocation to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs).

The HOME Program is authorized under Title II of the Cranston-Gonzales National Affordable Housing Act, as amended. Title 24, Code of Federal Regulations, part 92 implements the statutory authority to manage the HOME Program.

The City of Baltimore operates under a mayor/city council form of government and has been a Participating Jurisdiction (a unit of local government approved by HUD to receive funding) under HUD's HOME Program since 1992. As such, the City receives formula based allocations of HOME funds. The funds are administered through the City's Department of Housing and Community Development (DHCD). For Fiscal Years 1992 through 2000, the City of Baltimore was authorized $69,246,000. As of August 2001, $56,449,566 has been disbursed.

The Baltimore City Board of Estimates is a City government entity that controls all City operating and capital budget requests, including those involving housing issues. Board members, including the Mayor, City Council President, Comptroller, Director of Public Works, and the City Solicitor meet regularly to discuss and approve all City expenditures and policy matters valued at $5,000 or more, including those related to the HOME Program.

Many of the HOME Program projects financed by the City of Baltimore are associated with Low-Income Housing Tax Credit (LIHTC). The LIHTC was enacted by Congress to encourage new construction and rehabilitation of existing rental housing for low-income households and to increase the number of affordable rental housing units. In establishing the tax credit incentive, Congress recognized that a private sector developer may not receive enough rental income from a low-income housing project to cover the cost of developing and operating the project and provide a return to investors sufficient to attract the equity investment needed for development. To spur investment, Congress authorized the States to allocate tax credits to qualifying housing projects. The Internal Revenue Service and State tax credit allocation agencies jointly administer the program. After the State agencies allocate tax credits to developers, developers typically sell the credits to private investors. The investors use the tax credits to offset taxes otherwise owed on their tax returns. The money paid by the investors for the tax credits is paid into the projects as equity financing.

CRITERIA

According to 24 CFR 92.504(a): "The participating jurisdiction is responsible for managing the day to day operations of its HOME Program, ensuring that HOME funds are used in accordance with all program requirements and written agreements, and taking appropriate action when performance problems arise. The use of State recipients, subrecipients, or contractors does not relieve the participating jurisdiction of this responsibility. The performance of each contractor and sub-recipient must be reviewed at least annually."

Title 24 CFR 92.508 states each Participating Jurisdiction must establish and maintain sufficient records to enable HUD to determine whether the Participating Jurisdiction has met the requirements of this part.

Program income is defined in 24 CFR 92.2 as gross income received by the Participating Jurisdiction directly generated from the use of HOME funds. Program income includes, among other items, payments of principal and interest on loans made using HOME funds or matching contributions. CPD Notice 97-9 also prescribes that a Participating Jurisdiction must be able to identify which projects generated program income, including the amount.

Title 24 CFR 92.207 allows a Participating Jurisdiction to expend up to 10 percent of HOME Program funds for payment of reasonable administrative and planning costs necessary to carry out the program.

According to 24 CFR 92.504, before disbursing any HOME funds to any entity, the Participating Jurisdiction must enter into a written agreement with that entity.

Title 24 CFR 85.36(b)(2) states Grantees and subgrantees will maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders." Also, 24 CFR 85.36(c)(1) provides all procurement actions will be conducted in a manner providing full and open competition.

According to 24 CFR 92.218 through 222, the Participating Jurisdiction is to make contributions to housing that qualifies as affordable housing under HOME Program guidelines. During a fiscal year, the contributions must total at least 25 percent of the HOME funds drawn from the Participating Jurisdiction's HOME Program account unless the Participating Jurisdiction has received a reduction in the match requirement. CPD Notice 97-4 states that the City of Baltimore meets the criteria for a fiscally distressed local government and allowed its matching requirement to be reduced by 50 percent. Therefore, the City is only required to make contributions of at least 12.5 percent of its HOME fund expenditures. These matching contributions can be made as cash contributions from non-federal sources, forbearance of fees, or as donated property.

OBJECTIVES, SCOPE AND METHODOLOGY

The primary objective of our review was to determine whether the Grantee administered its HOME Program in compliance with HUD requirements. To accomplish our objective, we:

- Interviewed HUD Community Planning and Development and DHCD staff;
- Reviewed HUD automated system reports;
- Reviewed pertinent project records, loan agreements, and monitoring reports;
- Reviewed HUD HOME Program policies and procedures;
- Tested transactions relating to program income, administrative expenses, matching funds, and CHDO activity:

- Reviewed a judgmentally selected sample of completed and on-going acquisition, new construction, and rehabilitation rental and home ownership projects;

- Reviewed loan agreements for all projects that were associated with Low Income Housing Tax Credits, and;

- Conducted physical inspections and tenant file reviews at selected projects.

RESULTS OF OUR REVIEW

Generally, we found the DHCD is administering its HOME Program in accordance with HUD requirements. However, our review identified four areas where the DHCD needs to improve procedures and increase management emphasis in the administration of its Program. Specifically, our review showed:

1) Loan agreements and potential HOME Program income (payment of principal and interest) are not monitored and tracked.

2) Administrative expenditures are not adequately reviewed to ensure contracts are (i) formally established to acquire professional services; (ii) contract rates for technical inspection services are within approved limits and clearly defined; and (iii) invoices are sufficiently reviewed prior to payment.

3) Matching fund requirements are not properly applied to ensure accurate accountability.

4) HOME Program activities are not sufficiently monitored to ensure projects meet program objectives and CHDOs are certified in accordance with local policies.

Details of these matters follow.

<u>Loan Agreements and Program Income Were Not Monitored</u>

Our review of HOME project activity showed the City funded eligible activities by providing grants and loans to qualified beneficiaries to further low income rental and home ownership opportunities. Our analyses of loan activity showed HOME funding for projects involving LIHTC's was provided through loans that generally required the payment of principal and interest. HOME funds were also used to provide loans for projects not involving LIHTC's, but generally included debt forgiveness provisions so long as low income objectives were achieved. Accordingly, we only reviewed loans provided in conjunction with LIHTC's since these agreements usually included repayment terms and likely would generate program income.

During the period November, 1993, to August, 2001, the DHCD provided 51 HOME loans valued at $34.9 million that financed 41 LIHTC projects. We reviewed the loan agreements and case files for the 51 loans and determined that 48 were long term and 41 included interest-bearing provisions[1]. Additionally, terms in 17 of the loans required loan payments subject to the availability of surplus cash. When we questioned responsible DCHD personnel on how these loans and prospective HOME Program income were managed, we were told they were not aware of any income producing projects, and as such a loan management system had not been developed to track and monitor loans and the payment of principal and interest, or to examine the financial and cash status of relevant projects. DHCD officials indicated that in order to qualify for maximum LIHTC's, project funds generally had to be secured by a formal loan agreement. However, in our review we identified HOME funds totaling $1.2 million that were provided in support of 3 projects that were not fully secured by written loan agreements. Further, none of these loans were amended to fully secure additional funds provided or additional loans for the same project were not secured with written agreements. Officials also stated that even when loan arrangements were made, they did not intend to collect any principal and interest and instead would ultimately forgive the debt.

We believe HOME loans should be monitored and tracked, particularly in light of the long-term nature of the agreements[2], to ensure: loan provisions are enforced; payment of principal and interest is properly accounted for as HOME Program income; additional funds provided to existing projects are fully secured with written agreements; and the interests of the HOME Program and the DHCD are protected.

Because HOME Program loans are not monitored, there are minimal assurances that the $34.9 million in principal and projected $182.6 million in potential interest for the 51 loans we reviewed will be properly accounted for and re-programmed for HOME activities as appropriate. Further, to protect the Program's investment against default, additional HOME funds loaned in support of existing projects should be properly secured with fully executed deeds of trust. Specific details concerning the project, term, principal, interest, potential end-of-term payment amount, and projects with loan amounts unsupported by written agreements for each of loans we reviewed are summarized in Appendix A.

<u>Administrative Expenses Relating to the Procurement of Services were not Adequately Reviewed</u>

From February 1993 through May 2001, the City expended $4.8 million in HOME Program funds for administrative costs necessary to carry out the Program. The following chart summarizes the number of administrative transactions made and the amount of expenditures by category:

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[1] Although 41 of the 51 loans contained interest-bearing provisions, 47 required the repayment of the principal amount. Four loans contained debt forgiveness provisions and did not require repayment of the loan amount.

[2] Loan terms ranged from 1 to 45 years.

Cost Category	Transactions	Amount
Direct Salary	16,472	$ 1,131,523
Indirect Salary	65	1,591,087
Other Expenses	1,508	2,069,560
TOTAL	18,045	$ 4,792,170

Although our analyses of direct and indirect salary charges showed that the costs were properly supported, our review of 163 of the 1,508 "other" administrative transactions (valued at $1,185,092) showed the DHCD acquired professional services without formal, written agreements. The review also showed contracts contained unauthorized and conflicting rates, and contractors overcharged and were paid rates in excess of contracted rates. Details of these transactions follow:

- We noted 18 of the 163 transactions we reviewed were payments to two different firms for loan and legal services not identified and formalized in written agreements. As a result, we reviewed all payments (totaling $506,405) to these two firms. During the period of February 1994 through June 2001, the DHCD paid $214,513 to one company for loan servicing. Also, from September 1993 through April 2001, the DHCD paid $291,892 to another company for legal services.

  Although a significant number of administrative expense transactions were processed for these two companies, we could not find any evidence written agreements were established or that the services were competitively bid. DHCD personnel indicated formal procedures were not in place to review and evaluate administrative expenses that might be better obtained through a procurement process. Because contracts were not formally established, the nature and extent of the loan and legal services required by the DHCD was not documented and full and open competition was not fostered in obtaining these services. Consequently, we question whether the interests of the DHCD and HOME Program are being adequately protected and the services were obtained at a reasonable price.

- We noted 77 of the 163 transactions we reviewed were used to pay for contracted technical inspection services. Our review of the invoices and contract documents showed:

  - in 5 of the 77 transactions, contract rates were higher than those authorized by the Board of Estimates. In June 1999, the Board of Estimates authorized the DHCD to award contracts for construction and rehabilitation inspection services at rates not to exceed $150 per hour. In 5 of the 77 transactions we reviewed, rates were established at $200 per hour, which resulted in $1,750 in overpayments.

- 7 of the 77 transactions were associated with poorly written agreements that contained conflicting pay rates in different sections of the contract.

- 4 of the 77 transactions were incorrectly computed by the vendor and paid by the DHCD, resulting in overcharges totaling $3,585.

DHCD officials stated contracts and invoices were not adequately reviewed prior to execution and payment. Consequently, $5,335 was paid for technical inspection services at rates exceeding approved authorizations.

Matching Contribution Procedures Were Not Followed

In accordance with HOME Program regulations regarding Participating Jurisdiction matching contributions, the DHCD made cash contributions obtained from the issuance of municipal bonds and claimed as matching contributions those funds that were used to finance eligible affordable housing projects. However, contrary to prescribed procedures, the DHCD prematurely declared and duplicated match claims. During the period July 1996 through June 2001, the DHCD made 16 matching contribution transactions totaling $2.8 million. We analyzed these transactions and the procedures used by responsible personnel and found in 4 of the 16 transactions, authorized amounts exceeded expenditures by $46,114. HOME Program guidelines state that matching contributions can only be claimed to the extent that the funds are expended. Additionally, one transaction valued at $100,000 was claimed twice. As a result, as of June 30, 2001, the DHCD overstated its matching contributions by $146,114. A detailed summary of the overstated matching contribution amounts is as follows:

Project	Authorized Funding (Match Claimed)	Actual Cost	Overstatement of Match Claim
1413 Druid Hill Ave	$ 200,000 [a]	$ 100,000	$ 100,000
Osborne Payne	160,000	134,347	25,653
Mt. Pleasant Apts.	462,711	445,820	16,891
318 S. Broadway	256,652	253,084	3,568
Brunt Manor II	250,000	249.998	2
TOTAL			$ 146,114

a – Authorized amount of $100,000 was claimed twice

Although the DHCD had more than enough matching contributions to meet prescribed minimums, even when taking into account the $146,114 overstatement identified during the audit, surplus conditions may not always prevail as projects may be significantly reduced in scale or canceled. Accordingly, the DHCD should amend matching contribution procedures and only make matching claims when authorized funds are expended.

HOME Program Activity and CHDO Monitoring Needs Improvement

Based on 1999 HUD CPD performance assessments of the City's HOME Program, the DHCD experienced significant problems in maintaining an effective and comprehensive HOME Program and CHDO monitoring system. According to the DHCD, resource and personnel shortages precluded the implementation of an effective monitoring program. Further, the DHCD did not establish formal monitoring procedures. In January 2000, the DHCD developed procedures, and established and resourced a formal monitoring program. Our analyses of monitoring initiatives completed through October 2001 showed that the DHCD, while experiencing some difficulties in implementing the procedures during 2000, made much improvement in 2001. For example, of the 157 project reviews required in three monitoring areas during 2000, 51 (32 percent) were not completed. During 2001, only 6 of 154 (4 percent) were not completed. Details are summarized as follows:

Summary of Project Monitoring Reviews Completed During 2000 and 2001

	Monitoring Reviews - 2000			Monitoring Reviews - 2001		
Monitoring Area	**Required**	**Completed**	**Not Completed**	**Required**	**Completed**	**Not Completed**
Desk Review - Rent Rolls	75	57	18	64	64	0
Housing Quality Inspections	41	21	20	45	45	0
On-Site Verification - Rent Rolls/Income Certifications	41	28	13	45	39	6
TOTALS	**157**	**106**	**51**	**154**	**148**	**6**
PERCENT	**100.00%**	**67.52%**	**32.48%**	**100.00%**	**96.10%**	**3.90%**

While significant improvement was made in 2001, we found 6 of 154 reviews were not completed as the DHCD waived on-site monitoring visits at projects not having documentation and procedures to demonstrate the achievement of low-income affordability objectives. We believe monitoring reviews should have instead been completed and used to compel project managers to adhere to Program guidelines.

Further, our review of DHCD monitoring efforts showed the DHCD did not sufficiently monitor CHDOs to ensure they were certified on an annual basis as required by their own HOME guidelines. For example, as of August 2001, 5 of the 15 active CHDOs had expired certifications.

Unless more effort is dedicated to fully implement its monitoring program, the DHCD cannot be assured HOME Program activities will meet their objectives. Although the DHCD has made progress in establishing and implementing a HOME monitoring program, it needs to place more emphasis on its monitoring responsibilities to ensure required project reviews are completed and used to improve project compliance with Program objectives, and to ensure CHDOs are properly certified.

Recommendations:

We recommend you require the City to:

1A. Develop and maintain a loan management system designed to track, monitor and report the status of HOME Program funds loaned to eligible entities. At a minimum, ensure that the system maintains visibility over:

- Loan terms (project, principal, interest, time period, and special conditions);
- Prospective program income; and,
- Project financial status and surplus cash (when appropriate).

1B. Strengthen procedures to ensure that all HOME Program funds loaned to eligible entities are fully and properly secured with written agreements. Ensure formal loan agreements are established with those projects identified during the audit as having been provided unsecured HOME Program funds.

1C. Develop administrative cost review procedures that will allow for periodic analyses of expenses to make sure procurement procedures are used to the maximum extent practical. Ensure loan and legal service requirements, if needed, are formalized and contracts are competitively awarded to obtain these services.

1D. Ensure all existing technical inspection service contracts contain rates that are within Board of Estimates approved thresholds and contain contract specifications that are clear and consistent.

1E. Enhance invoice review procedures to ensure payments are made in accordance with contract rates and provisions.

1F. Amend existing matching fund contribution procedures so that match claims are processed when project funds have been expended. In addition, decrease the matching contribution amount claimed as of June 30, 2001 by $146,114 for those projects identified during the audit as having less than expected expenditure amounts.

1G. Place more emphasis on HOME project and CHDO monitoring to ensure that required reviews are performed and used to enforce project compliance with HOME Program objectives and to ensure CHDOs are annually certified.

The results of our review were discussed with DHCD and CPD officials during the review and at an exit conference held on December 13, 2001. DHCD officials stated they agreed with the review and have initiated actions to implement the recommendations made in this audit memorandum. DHCD officials acknowledged their verbal concurrence with the issues and recommendations as representative of their formal position and elected not to provide written comments.

If you have any questions, please contact Cliff Cole, Assistant District Inspector General for Audit at (804) 771-2100, extension 3794.

Summary of Loans Reviewed and Estimated Program Income Amounts

PROJECT	LOAN AMOUNT	LOAN TERM (YEARS)	INTEREST RATE	PRINCIPAL REPAYMENT PROVISIONS	INTEREST REPAYMENT PROVISONS	DUE DATE	PRINCIPAL - INTEREST DUE AT MATURITY
CHA II	$282,000	40	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	10/31/36	$419,860
919-931 N Broadway	$1,410,000	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	05/31/24	$1,900,467
221-223 E Preston	$180,000	25	1.00%	Deferred Until Maturity	Unspecified	05/31/20	$230,838
2321-2323 Maryland Ave	$200,000	25	1.00%	Deferred Until Maturity	Unspecified	10/31/20	$256,486
Royalton Arms	$450,000	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	06/30/25	$606,532
Royalton Arms	$173,937	1		Due by June 22, 1995		06/22/95	$173,937
Johnston Square	$1,320,000	20	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	12/31/14	$1,610,651
Maxwell I	$180,000	45	6.25%	Repaid with Int during final 30 years	Accr/Def for 15 years, then added to principal. Then accrue and pay for 30 years.	05/31/40	$2,754,703
Maxwell II	$532,000	20	6.13%	Deferred Until Maturity	Accrued and Deferred Until Maturity	12/31/15	$1,746,891
Res Hill VIII	$383,880 (a)	20	6.13%	Deferred Until Maturity	Accrued and Deferred Until Maturity	10/31/15	$1,260,519
Harford Commons	$900,000	30	1.00%	Annual Payments Subject to Available Net Cash Flow, Otherwise Deferred	Annual Payments Subject to Available Net Cash Flow, Otherwise Deferred	08/31/26	$1,213,064
Renaissance Plaza	$3,986,058	30	8.07%	Annual Payments Subject to Available Net Cash Flow, Otherwise Deferred	Annual Payments Subject to Available Net Cash Flow, Otherwise Deferred	02/28/27	$40,897,632
Oliver Plaza	$1,350,000	40	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	11/30/36	$2,009,966
Highlandtown Coop	$2,220,000	40	1.00%	Forgiven at Maturity		06/30/36	$0
Mt. Pleasant	$100,000	40	0.00%	Forgiven at Maturity			$0
Mt. Pleasant	$150,000	40	0.00%	Monthly Payments		10/31/37	$150,000
Mt. Pleasant	$400,000	40	0.00%	Monthly Payments (described as "must repay" in Deed of Trust Note)		10/31/37	$400,000
Mt. Pleasant	$600,000	40	0.00%	Monthly Payments Subject to Available Net Cash Flow, Otherwise Deferred		10/31/37	$600,000
Broadway North	$50,000	40	0.00%	Forgiven at Maturity			$0
Broadway North	$450,000	40	6.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	02/28/38	$4,628,573
Bon Secours	$230,000	40	6.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	07/31/38	$2,365,715
Pembrooke Apartments	$270,000	40	0.00%	Deferred Until Maturity		06/30/39	$270,000
Res Hill IX	$332,000	40	6.55%	Monthly Payments	Accr/Def for 15 years, then added to principal. Then accrue and pay for 25 years.	09/30/38	$4,200,261
Res Hill X	$298,000	40	6.55%	Monthly Payments	Accr/Def for 15 years, then added to principal. Then accrue and pay for 25 years.	10/31/39	$3,770,114
Bon Secours II	$250,000	40	6.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	11/30/39	$2,571,429
Park Heights Senior	$650,000	40	6.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	05/31/39	$6,685,717
Polish Natl Alliance	$153,400	30	1.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	07/31/30	$206,760

Summary of Loans Reviewed and Estimated Program Income Amounts

PROJECT	LOAN AMOUNT	LOAN TERM (YEARS)	INTEREST RATE	PRINCIPAL REPAYMENT PROVISIONS	INTEREST REPAYMENT PROVISONS	DUE DATE	PRINCIPAL - INTEREST DUE AT MATURITY
Butcher's Row II	$306,600	30	6.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	07/31/31	$1,760,954
Bennett House	$250,000	40	6.00%	Deferred Until Maturity	Construct Loan period interest Accr/Def until perm loan. All interest accrued and deferred until maturity.	10/31/40	$2,571,429
Res Hill XI	$272,000	30	5.92%	Monthly Payments	Accr/Def for 15 years, then added to principal. Then accrue and pay for 15 years.	04/30/30	$1,527,243
Bon Secours III	$250,000	40	6.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	07/31/41	$2,571,429
Park View at Coldspring	$675,000	40	1.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	06/30/41	$1,004,983
C.R. Uncles Senior	$1,000,000	40	1.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	06/30/42	$1,488,864
Coel-Grant-Higgs Senior	$1,300,000	40	6.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	11/30/42	$13,371,433
Forest Park Senior	$1,900,000	40	1.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	05/31/42	$2,828,841
Res Hill XII	$348,502	45	6.00%	Repaid with Int during final 25 years.	Accr/Def for 20 years, then added to principal. Then accrue and pay for 25 years.	08/31/46	$4,796,994
Pratt St Transitional	$639,102	40	6.00%	Annual Payments from Surplus Cash	Annual Payments from Surplus Cash	08/21/42	$6,573,623
St. Elizabeth's	$450,000	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	09/05/27	$606,532
Belair Elderly	$1,065,828	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	02/06/27	$1,436,575
Hillside Park	$45,000	40	0.00%	Forgiven at Maturity			$0
Hillside Park	$454,900	40	10.50%	Annual Payments from Surplus Cash	Construct Loan period interest Accr/Def until perm loan. Annual Payments from Surplus Cash	11/30/38	$24,683,518
Hillside Park	$354,331 (a)						$354,331
Druid House Transitional	$404,768	40	6.25%	Annual Payments from Surplus Cash	Construct Loan period interest Accr/Def until perm loan. Annual Payments from Surplus Cash	05/31/40	$4,574,712
Eutaw Place	$606,593	40	8.01%	Annual Payments from Available Net Cash Flow	Annual Payments from Available Net Cash Flow	11/30/36	$13,226,838
Eutaw Place	$1,433,407	40	8.01%	Annual Payments from Available Net Cash Flow	Annual Payments from Available Net Cash Flow	11/30/36	$31,255,623
Esplanade Apartments	$2,590,000	30	6.33%	Annual Payments from Available Net Cash Flow	Annual Payments from Available Net Cash Flow	11/30/25	$16,329,549
Bon Secours at Liberty	$400,000	30	6.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	12/31/30	$2,297,396
Bowley's Lane	$800,000	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	02/28/28	$1,078,279
Bowley's Lane	$762,708 (a)						$762,708
Burdol (Burleith)	$473,119	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	04/30/28	$637,693
Burdol (Dolfield)	$626,881	30	1.00%	Deferred Until Maturity	Accrued and Deferred Until Maturity	04/30/28	$844,941
TOTAL	**$34,910,014**						**$217,514,603**

(a) = Additional HOME funding provided that was not secured with a fully executed deed of trust

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