

HUD Audit Guide – Chapter 3

HUD Multifamily Housing Programs

[Text in this font is information from the new Chapter 3. Text in this font is guidance from other sources.]

1

3-1. BACKGROUND. This chapter contains the U.S. Department of Housing and Urban Development's (HUD) requirements for conducting the compliance portion of the annual financial audits of profit-motivated and limited-distribution entities participating in HUD's Federal Housing Administration (FHA) multifamily housing programs "except for hospitals, which are covered by chapter 4 of this guide. For audits performed under this chapter, which include many different types of projects, the required compliance testing must be done for each project on an individual basis except when the project is owned and/or managed by an entity that owns and/or manages multiple HUD/FHA-assisted projects. When this condition exists, audit guide compliance sections, paragraph 3-5.L, Tenant Application, Eligibility, and Recertification; paragraph 3-5.I, Tenant Security Deposits; and paragraph 3-5.M, Management Functions, can be audited on an individual project basis or can be sampled using a group project-basis sample (defined later in this section) if

2

A. The same system is used by management for the compliance section for all projects selected for inclusion in this group project-based sample.

AHACPA Note – The definition of what constitutes a "same system" has not been outlined by the OIG. The degree of acceptability could vary by practitioner. The auditor is cautioned to exercise professional judgment in making this assessment.

B. For the projects that are to be included in the population and sample, the compliance section has the same supervisor for all projects, the procedures followed are identical, and the test of internal controls did not disclose any weaknesses.

C. The owner(s) agrees to the project-based sample method.

AHACPA Note – The consensus among practitioners is that this approval is best documented in the engagement letter. If the engagement letter is signed by the management company, a separate letter must be obtained by the CPA from the owner agreeing to the group-based sample. Further, owners and CPAs should be aware of the potential finding consequences due to non-compliance of other owners in the sample that could impact their compliance reports.

D. The auditor fully documents in the work papers the above information upon which the determination was made, including the owner's signed agreement.

3

All other compliance sections except for the three cited above must be performed on each project.

When a condition or weakness is found during the testing that is required to be reported, it must be reported in the audit report for each project in the population. Reference should be made to each report that contains that type finding. If dollars are

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Didier Musso

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