

HEROS Kickoff for Partner Roll-Out

Internal Training

JANUARY 31, 2018



Changes on Feb. 1, 2018

- Consultants and PHAs working on Part 50 RAD environmental reviews are encouraged to start using HEROS on February 1
- Due to a technical issue, the rollout to FHA Multifamily programs is delayed
 - FHA Multifamily Partner rollout is anticipated in May 2018
 - Encourage you to attend today's training
 - Training will be recorded



HEROS Availability

HEROS was introduced to programs/users on a rolling schedule

For FHA Multifamily Production, HEROS officially replaced the 4128 with 2016 MAP Guide updates.

RAD has been using HEROS since Summer 2015.

With the latest system improvements, we can now roll out to Partner users (e.g. consultants, contractors, lenders, applicants, PHAs, etc.)

Partner use is optional, but encouraged.

Partners cannot use HEROS for any other HUD program at this time

- Healthcare and Hospital Programs currently use HEROS but will not be working with Partners in HEROS at this time.
- HUD plans to allow Partners to use HEROS for Public Housing and CPD reviews later in 2018



HEROS Partner Roll Out

What Changes

Partners can enter documentation directly into HEROS
HUD staff reviewing rather than uploading.

What does not Change

HUD staff still the preparer and legally responsible for environmental determinations.
Communication pathways between partners, program staff and ECO staff remain the same.

Environmental Reviews:

Partner Roll-Out

Applicants and their third party contractors/consultants may prepare supporting documentation.

HUD must **independently evaluate** their work & prepare the environmental reviews (i.e. supplement, correct, append, etc.)

Certain aspects of environmental review (e.g. contacting tribes) must be completed by HUD.

◦Correspondence and public notices must be sent under HUD's signature on its letterhead.

Who's Who in HEROS?



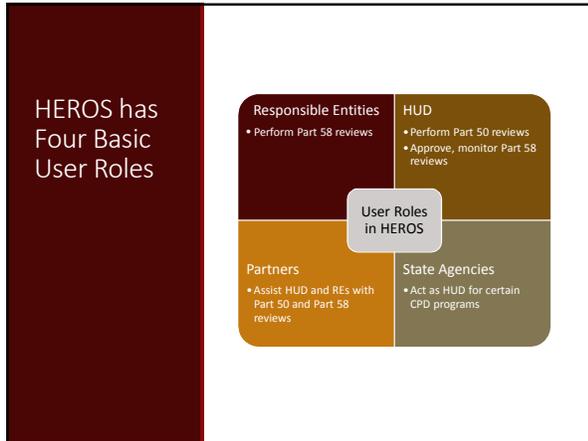
HUD Preparer
➤ You!

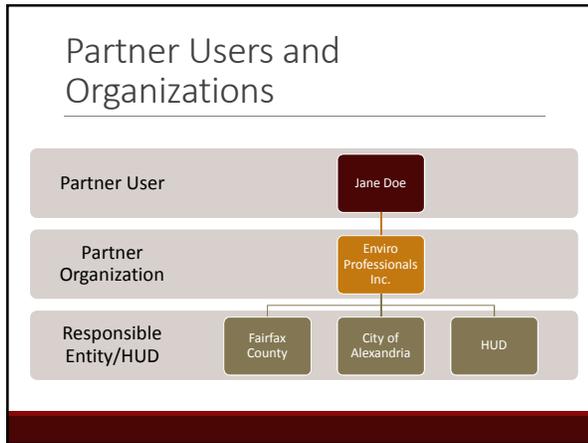


Partner
➤ 3rd Party Consultants
➤ PHAs
➤ Applicants



ECO
➤ FEO/REO review and comment on EAs over 200 units





HEROS Process for Partners

CURRENTLY

- Partners assemble data and documents and submit to HUD
 - Currently, this information is submitted to HUD and HUD staff enters all information and uploads all documents into HEROS. HUD recommends using [Partner Worksheets](#) to submit information

NEW PROCESS

- With this rollout, partners can now input this information directly into HEROS. HEROS screens are equivalent to the Partner Worksheets.

HEROS Process for HUD Preparers

CURRENTLY

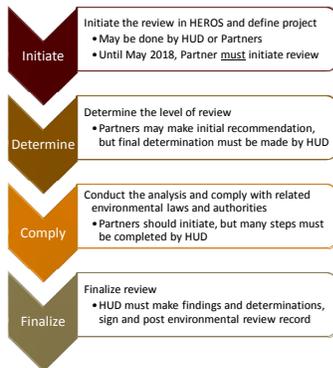
1. HUD preparer reviews information and completes analysis as needed
 - Follow up for any missing information
 - Uploads information into HEROS
 - Complete all findings and determinations that must be made by HUD
 - Get all required signatures in HEROS

NEW PROCESS

1. HUD preparer reviews information directly in HEROS
 - Follow up for any missing information
 - Complete all findings and determinations that must be made by HUD
 - Get all required signatures in HEROS

Working with Partners in HEROS

Steps in the Environmental Review



Initial Screen

Partner vs. HUD Preparer

Field on Screen 1105	Partner	HUD Staff
Project Name	Enter a name that all parties will recognize. Include the name of the current building and/or the AMP in the project name.	Confirm partner entry
Grant/Project ID Number	Enter the PIC ID/FHA Project Number	Confirm partner entry
HUD Program	Select Rental Assistance Demonstration (RAD) or Housing: Multifamily FHA, then the specific program (221(d)(4), 223(f), etc.)	Confirm partner entry
Estimated Total HUD Funded, Assisted, or Insured Amount	Enter 0	Enter the final (estimated) insured amount
Estimated Total HUD Project Cost	Enter 0	Enter the final (estimated) insured amount

Field on Screen 1105	Partner	HUD Staff
Does this project anticipate the use of funds or assistance from another Federal agency in addition to HUD?	Select "Yes" only if another federal agency (e.g. FEMA, EPA) is contributing funds to this project. Do not select "Yes" if the project is applying for LIHTC. The response will typically be "No" for RAD projects.	Confirm partner response
Does this project involve over 200 lots, dwelling units, or beds?	Select Yes or No	Confirm partner response
Applicant/Grant Recipient Information	Search for the Housing Authority (for RAD) or applicant (for FHA) by name and/or location. If it does not appear in the system, select "Other," and enter the Organization and contact name manually.	Confirm partner response (note that all Housing Authorities should appear in the system)
HUD Preparer	Provide the name of your Transaction Manager ("TBD" if unknown) or assigned underwriter or appraiser ("TBD" if unknown)	Confirm partner response and update as appropriate
Consultant Information	Enter the name of your firm and your name	Confirm partner response

Project Summary Screen

Partner vs. HUD Preparer

Field	Partner	HUD Staff
Description of the proposed project	Provide a project description that captures the maximum anticipated scope of the proposal. It should include all contemplated actions which logically are, either geographically or functionally, a composite part of the project, regardless of the source of funding. Describe all physical aspects of the project, such as plans for multiple phases of development, size and number of buildings, and activities to be undertaken. Include details of the physical impacts of the project, including whether there will be ground disturbance. If more space is required, upload a separate document below.	Review very carefully to ensure accuracy and completeness
Address	Provide a representative street address for the project	Confirm
Location Information	If the project involves new construction, affects more than one street address, or otherwise requires further explanation, describe the full geographic scope of the project in this space	Confirm
Upload	Upload any site maps, photos, and other information on the project description and location	Review attached documents
Field Inspection	Leave this section for HUD to complete	Enter field inspection information

Determining Level of Review

- Partners may make a preliminary level of review selection
- **Only HUD can make the final level of review determination, and must confirm Partner's selection**
- Refer to program guidance for information on determining level of review
 - Contact FEO/REO for help if unsure

Level of Review Guidance

Categorically Excluded not Subject to 50.4 (CENST)	Categorically Excluded Subject to 50.4 (CEST)	Environmental Assessment (EA)
<ul style="list-style-type: none"> • Already in HUD's portfolio: An ER was already completed AND • Routine maintenance* only: No new impacts • Only flood insurance required (floodplain may have moved) • 223(a)(7) refinances and 223(f)s in HUD's portfolio with only routine maintenance* • No RAD conversions are CENST 	<ul style="list-style-type: none"> • Not yet in HUD's portfolio: New ER required regardless of whether project involves minor rehab or only routine maintenance* • "Part A" of 4128 • 223(f) refinance/purchase without major rehab • RAD conversions without new construction or major rehab • Minor repairs at any time 	<ul style="list-style-type: none"> • New construction or major rehab • 221(d)(4) • "Part B" of 4128 • Full NEPA review • ECO signoff is required if 200+ units
		Environmental Impact Statement (EIS)
		<ul style="list-style-type: none"> • New construction or sub rehab affecting 2,500+ units/beds or with a <i>significant impact</i> • See CEQ regs

Section 50.4 Requirements:

Partner Initiated

Historic Properties	Farmlands Protection
Floodplains	Noise
Coastal Zone Management	Explosive & Flammable Hazards
Coastal Barrier Resources	Airport Clear Zones
Sole Source Aquifers	Contaminated Sites
Endangered Species	Environmental Justice
Wild & Scenic Rivers	Flood Insurance
Air Quality	Wetlands

Additional MAP Requirements:

Partner Initiated

Chapter 9 of the MAP Guide imposes additional environmental review requirements beyond those in 24 CFR Part 50:

- Lead-based paint (9.5.A)
- Asbestos (9.5.B)
- Radon (9.5.C)
- Towers (9.5.P)
- Oil or Gas Wells (9.5.F)
- Pipelines (9.5.P)
- Transmission Lines (9.5.P)

In some cases, it will also place additional requirements on the 50.4 laws and authorities not otherwise required of HUD projects.

- Contamination requirements in 9.3 and 9.4
- Floodplain requirements in 9.5.E
- Explosive/Flammable Hazards in 9.5.I

Additional RAD Requirements

RAD follows the MAP guide with two exceptions for PBRA with no FHA:

- The PHA or owner may provide either an ASTM 1527-13 Phase 1 OR an ASTM E 1528-14 transaction screen
- Radon testing is encouraged but not required

Related Laws and Authorities and Partners

- A Partner cannot legally complete the full analysis and compliance steps for all laws and authorities
 - E.g. Section 106 consultation, 8-Step Process
 - Partners may make suggestions and initial analysis, but HUD will make final determinations
 - To ensure that HUD reviews each related law and authority, Partners may *not* reply to the final question on each screen ("Are formal compliance steps or mitigation required?")
- **However**, HEROS requires that each screen be fully complete before you can upload documents
 - Partners should respond to all questions using their best suggestions for HUD
 - In the compliance determination box, Partners should explain their actions and suggestions
 - HUD staff will use their feedback to complete the screens

Uploading Documents

- HUD is asking Partners to upload each document on the corresponding screen
- This will facilitate HUD's review and minimize delays
- No longer accept a single Phase 1 upload with page numbers in compliance factors.
- Be aware of prompts within screens to determine what documentation required to move forward.

Key Things to look for as HUD Preparer

- Check initial screens and fill in missing information (e.g. cost estimates, site visit)
- Confirm level of review
- Click through each related law and authority screen, evaluate all documents and info, and remove any placeholders
- Complete any consultation and make all determinations (e.g. floodplain management, wetlands protection, historic preservation, endangered species)
- Check mitigation measures
- Make a finding (e.g. FONSI)

Floodplain Management

[Instructions for Partners](#)

Partners should [create a FIRMeTte](#) with the site marked and identify whether the project site contains any floodplains

- Make a preliminary suggestion as to whether an exception in 24 CFR 55.12 applies
- If the 8-Step or 5-Step Process is required, work with HUD to complete that process
- Partners should not conduct any part of the 8- or 5-Step Process without first consulting with HUD

HUD Preparer should review and evaluate all information provided and complete 8-Step or 5-Step Process as required

Wetlands Protection

Instructions for Partners

If project involves ground disturbance:

- Use the [National Wetlands Inventory](#) as a preliminary screening tool to determine whether the site contains a wetland
- If so, consult with HUD to determine whether to consult with US Fish and Wildlife or complete a wetlands delineation survey
- If 8-Step Process is required, coordinate with HUD: only HUD may complete the 8-Step Process

HUD Preparer should review and evaluate all information provided and complete 8-Step or 5-Step Process as required

Endangered Species

Instructions for Partners

Partners should not contact the US Fish and Wildlife Service or NOAA Fisheries.

- If consultation is required, Partners should coordinate with HUD.

HUD Preparer should review and evaluate all information provided and consult with the Services as required

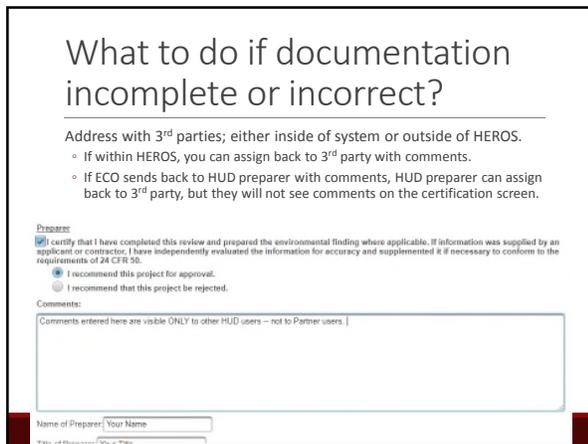
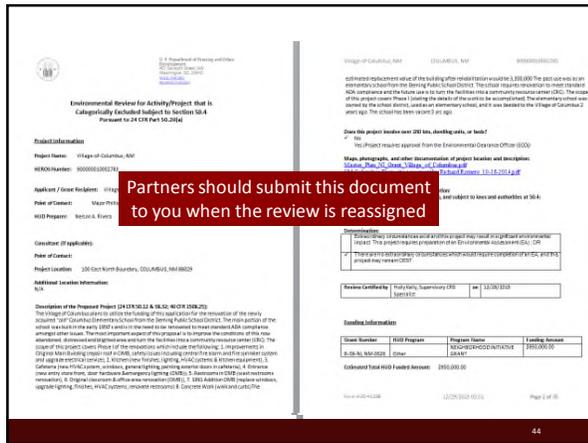
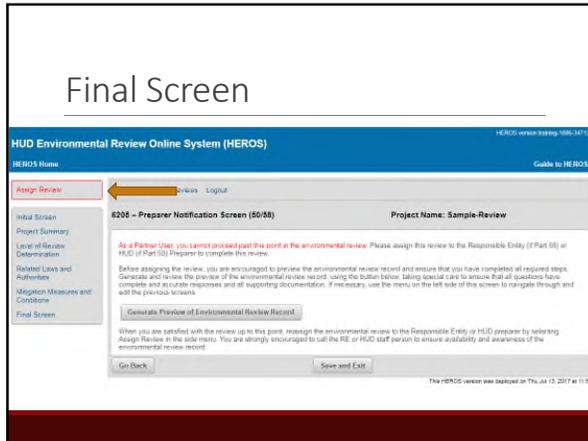
Historic Preservation

Instructions for Partners

Partners should not contact State Historic Preservation Officers (SHPOs) or Tribal Historic Preservation Officers (THPOs)

- Make a preliminary suggestion regarding the consulting parties and the effects determination
- Describe your conclusions
- If the project includes ground disturbance or is in or near a historic building or a historic district, coordinate with HUD as soon as possible

HUD Preparer should review and evaluate all information provided and complete Section 106 consultation as required



Posting to the HUD Exchange

Completed Part 50 and 58 reviews will be archived on HUD Exchange for a year.

<https://www.hudexchange.info/environmental-review/environmental-review-records/>

The screenshot shows the HUD Exchange website interface. At the top, there is a navigation bar with 'HUD EXCHANGE' and 'My HUD Exchange' tabs. Below this, the 'Environmental Review Records' section is displayed. It features a search bar and a 'Filter By' section with dropdown menus for 'All Report Durations' and 'All Status'. A list of records is visible, including one from 'West 2nd North Street School' with a 'Completed' status and a public comment available until 04/20/17. A 'Related Resources' sidebar on the right lists 'Environmental Review FAQs' and 'Environmental Review Submittals'.

Tools and Resources

This slide contains the text 'Tools and Resources' centered on a white background with a dark red footer bar.

HEROS Resources

Training materials on the HUD Exchange include:

- User Guide: <https://www.hudexchange.info/resource/3150/heros-user-guide>
- How-To Videos: <https://www.hudexchange.info/resource/3848/heros-e-tutorials/>
- FAQs: <https://www.hudexchange.info/heros/faqs>
- HUD Exchange "Ask A Question": <https://www.hudexchange.info/program-support/my-question/>
- Live Q&A Webinars
- HEROS Worksheets: <https://www.hudexchange.info/resource/5119/environmental-review-record-related-federal-laws-and-authorities-partner-worksheets/>

Materials are available at: <https://www.hudexchange.info/environmental-review/heros>



WISER Modules

Getting Started (Part 50 and Part 58)	Environmental Justice
Tools and Resources	Environmental Assessment Factors/Site Planning
Airport Hazards	Explosive and Flammable Facilities
Endangered Species	Wild & Scenic Rivers
Noise Abatement and Control	Farmland
Water Elements	Air Quality
• Floodplain Management	Historic Preservation: The Section 106 Process
• Flood Insurance	Site Contamination
• Coastal Barrier Resources	
• Coastal Zone Management	
• Sole Source Aquifers	
• Wetlands	

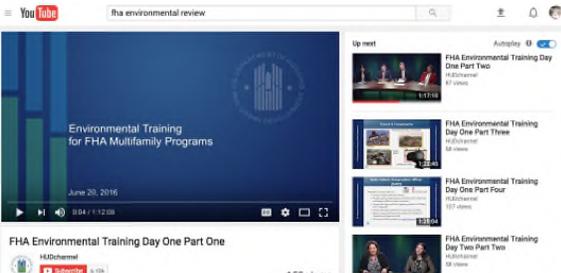
Program Environmental Resources

2016 MAP Guide: <https://www.hud.gov/sites/documents/4430GHSGG-BM.PDF>

Environmental Review Requirements for RAD Transactions: <https://www.hudexchange.info/resources/documents/Environmental-Review-Requirements-for-RAD-Transactions.pdf>

Extended FHA Environmental Review Training

<https://www.youtube.com/watch?v=koGldiHziVI>



HEROS Quick Links

OEE on the HUD Exchange:
<https://www.hudexchange.info/environmental-review/>

HEROS on the HUD Exchange:
<https://www.hudexchange.info/environmental-review/heros/>

FAQs: <https://www.hudexchange.info/heros/faqs>

Log into HEROS: <https://heros.hud.gov/> or
<https://heros.hud.gov/ssoheros/>

Questions?

Technical questions about HEROS should go to Ask A Question at
<https://www.hudexchange.info/get-assistance/my-question/>.

Project-specific or environmental review questions should go to
your HUD Program contact.
