Michigan's Housing Opportunities Promoting Energy Efficiency (MI-HOPE) 2022 RFP Q & A and Submission Guidance 8/10/2022

- 1. Q. Is it possible to access the xlsx file associated with Exhibit C to get a list of the zip codes in the presumed impacted eligible areas?
 - A. The spreadsheet is posted on the website: Moderate Income Zip Codes Excel Spreadsheet
- 2. Q. If we Submitted Part 1 of the application requesting a certain dollar amount. However, after the initial meeting today, we are looking at the possibility of increasing that amount. Are we able to increase amount requested or are we bound to the amount submitted in Part 1? In addition, if we are able to increase our request, do we just submit the Attachment 5 of Part 2 with the increased amount or is there something in Part 1 we need to revise?
 - A. You would need to redo the Part 1 and Part 2 must match the requested amounts.
- Q. I am a homeowner in Michigan. I need new roofing on my house and cannot afford it. Are there any programs available for assistance with something like that?
 A. Our MI-HOPE Program is accepting applications from non-profits, governments, and land banks only.
- 4. Q. When filling out he first steps of the application, it only allows you to select Rural or Urban area. The service area for our community action agency encompasses both urban and rural. Is there a way to apply for both?
 - A. For purposes of the MI-HOPE program, if an applicant's service area is comprised of both urban and rural then the applicant should select Urban.
- Q. Are accessibility handrails an eligible expense for MI-HOPE?
 A. Standalone Accessibility items are not currently eligible for the MI-HOPE program. All code related items are permitted when part of a larger scope of work.
- 6. Q. What details do you need for Leverage Funding on attachment 6 to account for staff time?

 A. Just include general estimate and explanation.
- 7. Q. Is an authorizing resolution required?
 - A. This requirement has been removed and not required.
- 8. Q. Can MSHDA NEP or MOD funding be considered leverage funds if the grant period overlaps?

 A. No, leveraging funds must be non MSHDA sources.
- Q. Can local ARP funding used for road/water/sewer projects in the same geographic area be considered as leverage funds?
 A. Yes
- 10. Q. What is the difference between emergency repairs and non-emergency repairs?A. Emergency repair examples: Structural components in critical condition, Mechanical systems for health and safety, temporary protection to mitigate against further damage, electrical

hazards that pose immediate health and wellbeing issues. Emergency Repairs are not, deferred maintenance items, lead paint abatement, demolition, security systems, sprinkler systems, AC installation, appliances, landscaping, or driveway repairs.

11. Q. Can previous NEP participants participate in MI-HOPE?

A. Yes.

12. Q. Does MI-HOPE require liens for participants?

A. No.

13. Q. Does in kind support have to be cash only?

A. No.

14. Q. For Rental Units, NEP has requirements for landlords to pay 50% of the repairs and lien requirements. Does MI-HOPE have the same requirements?

A. No.

15. Q. What type of project information is required prior to approving construction? If a furnace replacement or insulation is needed, does an audit need to take place or does a contractor need to recommend?

A. Energy audit is required. For furnace replacement-Contractor recommendation if not working Energy audit if working.

- 16. Q. Do potential savings (energy and dollars) need to be reported per installed measure?

 A. Yes, this data will be needed for the (final) outcome report.
- 17. Q. Do contractors need to be identified at time of application? Do they need to be on the contractor list on the MI-HOPE page?

A. No and No.

18. Q. Does the program prefer prioritizing a greater number of homes served or maximizing dollars per home?

A. MSHDA would like to help as many people as possible. Local need parameters of preference identified by sub-recipient.

19. Q. Can an entity offer a limited set of energy savings upgrades per home such as only HVAC or water heaters only?

A. Yes, sub-recipient can choose which items to offer and be more stringent on local program guidelines.

20. Q. How will you evaluate between applications in the same area; one that serves a wide range of residents I.e., county wide v urban and/or an application that serves neglected neighborhoods.

A. Each area's applications will be reviewed independently. If there is a possibility of multiple

applicants of an area apply, a collaborative strategy/discussion will be held to determine best approach.

21. Q. Is MSHDA looking for collaboration or independent grants?

A. There is no difference in selection of collaboration groups vs. Individuals. An entity may request a certain amount of funding, but that amount is subject to reduction as we determine the geographic distribution of funding.

- 22. Q. I'm working on a submission MI-HOPE funding. Who should the letters of Support be addressed to?
 - A. MSHDA-NHID
- 23. Q. Please confirm if this analysis is correct:
 - \$1,000,000 max award 5% admin = \$50,000 for admin and \$950,000 for Project costs
 - \$950,000 (project costs) with a max of \$25,000 per property.
 - Within the \$25,000 cap per property: 10% can be used for Activity Delivery Costs and 90% can be used for project hard costs
 - Of the project hard costs, at least 75% must be used for energy improvements
 - Up to 25% can be used for emergency repairs
 - A. Yes, it could be structured this way however there are soft costs allowed which is not identified in your scenario.
- 24. Q. Is a Regional Planning agency with experience administering similar programs eligible to apply?
 - A. Yes, we are encouraging any government agency or any non-profit 501C agency to apply across the state except for agencies serving the City of Detroit. This money cannot be used within the City of Detroit's boundaries as they are receiving their own funding of \$15 million dollars through the program.
- 25. Q. I see that leveraging funds is encouraged, can we braid funding from other grants with HOPE in the same project?
 - A. Yes, we encourage leveraging of funding. We want to stretch the dollars to help as many people as possible.
- 26. Q. If the total repair costs for a given property exceed the \$25,000 max with this program, would there be any prohibition if the program administrator uses funding from another program to supplement / leverage the MI-HOPE funds? Would it matter if the other funds were backstopped by ARP \$'s (but provided by another government agency)?
 - A. We will allow that. You can use other ARP dollars as match. We are encouraging collaborations between all the agencies in the area.
- 27. Q. Can a new program that hasn't had an audit yet apply for funding?

A. Yes, we're encouraging newly formed agencies to apply as well. If you don't have an audit, you will need to submit a statement on your letterhead that states when your agency was created and that an audit has not been prepared. This statement will be uploaded to your Partnership Profile when you are ready to submit your Partnership Profile.

- 28. Q. Is our organization able to determine what repairs will be made or are certain repairs required as part of the grant?
 - A. On page 5 of the <u>Term Sheet</u> you'll see a list of all of the eligible activities. You can pick and choose from that list, you don't have to use them all. You can choose 1 or 2 or you can use the entire list. The list of items on the Terms Sheet are the only items this money can be used for.
- 29. Q. How do you do complete Part 3, does it open up after we do Part 1 and 2?
 - A. Parts 1 and 2 have to be completed first. Note: to access part 3, the system access form has to be submitted to MSHDA-MI-HOPE@michigan.gov
- 30. Q. The program description states: "no carryover waitlists from previous non-MI-HOPE programs/applications allowed unless identified within the program guidelines". Please provide additional information about this. Many agencies have managed similar programs funded by ARP \$'s that cycled through other government entities (city and/or county programs). The 501(c)(3) administrators have more people on their wait lists than the number of households that can be assisted with the previous ARP \$'s. It would stand to reason that MSHDA's MI-HOPE program should be available to assist the folks on current waiting lists.
 - A. As you can see from our statement we said unless it's in the Program Guidelines. The Program Guidelines are approved by our staff on an individual basis. We do not want a waiting list from 20 years ago being used. This new funding source must be made available to all the residents in the area and on an even playing field. If you have a brand-new ARP waiting list that was created in the last year and it was for the same exact funding activities, that would be reasonable, and we would allow that. If you a waiting list for a program that is closely aligned with this program or doesn't include an energy efficiency component, that waitlist will not be allowed. We want everyone to have free and equal access to these funds.
- 31. Q. Will this grant allow windows to be done as a standalone project or would they need to be combined with another project.
 - A. If you have an energy audit and there is an identified need for standalone windows and there is nothing else needed to make that house energy efficient, that will be allowed.
- 32. Q. Is it possible to raise the admin amount?
 - A. Page 17 of the <u>Application Instructions</u> Exhibit G covers this in depth. Up to 5% can be billed as program administration costs that are for the program as a whole and cannot be tied to a specific project address. This is for general management and oversite of the program, that can include marketing, monitoring, and evaluation. In addition to the 5% we allow 10% for Activity delivery costs on those projects by address. We also allow soft costs. These are fees that are

incurred that can be tied to a specific address. This includes inspecting the property to ensure that the construction work is complete, ensuring paperwork has been completed for a specific address. These costs must be reasonable, and the costs must be documented.

33. Q. How do we get to Part 3 (Partnership Profile)?

A. If you currently have access to the MATT system, you can login and start filling out the Partnership Profile once you're done with Parts 1 and 2. If you are new and do not have access to the MATT system yet you will need to complete the System Access Form (Exhibit F in the <u>Application Instructions</u>) and submit it to the MI-HOPE email box.

MSHDA-MI-HOPE@michigan.gov

If you need help completing the <u>Partnership Profile</u>, we have a video on the process.

34. Q. If we are an existing MSHDA grantee with a current Partnership Profile, do we need to create a new one?

A. If you have an existing Partnership Profile that was approved within the last year, you do not need to create another one, you are done with Part 3. If your most recent Partnership Profile was approved more than a year ago, you will need to complete a new one.

35. Q. If multiple organizations are working together how does it work?

A. You will need to identify 1 lead organization and just have the other organizations included in the application with the lead organization. You will need letters of support from each of the other organizations. The support letters can be in e-mail format.

- 36. Q. Can this funding be used for Mobile homes?
 - A. No, Phase 1 is not eligible for mobile homes.
- 37. Q. What are we looking for in terms of long-term impact measurements?

A. We put that in there so that you could tell us if you already have measurables identified. We will be giving you a list of what measurables and outcomes that we want tracked as part of the next training session for selected applicants. There will be no tracking of households after the fact, it'll be projected cost savings.

- 38. Q. If multiple agencies in the same area apply for and receive HOPE funds, do we need to confirm that a household has not received assistance through the other agency? Will there be a mechanism to do so?
 - A. Multiple agencies will not be able to service the same area boundaries.
- 39. Q. Will our organization be able to determine the repairs made or does the grant require certain repairs to be made?

A. We are going to allow each subrecipient to decide what repairs are necessary and reasonable to be, that will be a local decision. Our Construction Manager will be going on site to see the finished projects. He will be visiting each subrecipient during the grant term.

- 40. Q. If we have a current program application for home repairs/weatherization, can we amend this application to cover HOPE as well, or do we have to use the HOPE application documents as a stand-alone application?
 - A. The MI-HOPE application is a standalone application, Weatherization has their own separate application. We are encouraging people who are utilizing Weatherization to use this funding because the funding items are deferral items for Weatherization so to be able to access Weatherization funds these households will need these items to be completed.
- 41. Q. What information will need to be collected and reported from homeowners?
 - A. If you go to the <u>Application Instructions</u> Exhibit D (pages 10-12), you can see the data we will need collected.
- 42. Q. Can you provide a definition of Material as used in the definition for Qualified Financial Hardship (i.e., a material reduction in income or material increase in living expenses)?A. The definition of material is these boxes on the Term sheet. They need to check one of these boxes as to which one is applicable to them.
- 43. Q. I the application it talks about the Housing Community Development Fund, missing middle, Energy Efficiency. If we are applying for those funds, how do they relate, do you have a sense of when the documentation will be out for all the other funds?
 - A. They will be out this fall. This is for informational purposes only; we want to make sure that people are aware it's coming.
- 44. Q. When will the recording be available.
 - A. We will not be releasing the recording due to issues with sending the recording outside of the State of Michigan system.
- 45. Q. How do we calculate the energy cost savings?
 - A. We will be giving you some guidance on that. It isn't something you need to provide as part of the application.
- 46. Q. Our construction team does assessments, and they are able to determine what repairs are to be completed. If there is work that we don't necessarily do will be required to do it, like appliances is that something that we have to include?
 - A. You can choose which of the options you will perform. For example, if you wanted this to be a roof only program you could do that.
- 47. Is there a certain number of quotes required?
 - A. Yes, we require a minimum of two unless there is more than a 25% difference between them in which case, you'll need a third quote and/or it will be reviewed by our Construction Manager.
- 48. Q. We're working with a group that does work county wide, how are we going to get a letter from each individual municipality.
 - A. You can get a letter from the County Administrator.

- 49. Q. It's not in the instructions, but the sample evaluation sheet notes that letters of support from the agency needs to include every unit of government for areas a non-profit intends to provide services, is this true for non-profits that serve multi-county areas of the state?
 A. If you're a non-profit and you service a certain area of the state you do not need to get letters from every municipality within that boundary, however if you are going to be working with someone who is leveraging funds with you or providing a service you need a letter from them.
- 50. Q. Can you talk about what level of energy modeling will be required?

 A. We are still determining that, we're looking at HERS rater but that hasn't been determined yet. That will be part of the next steps for subrecipients. If you have a recommendation of what you would like to see, send it to the MI-HOPE email box, we would like suggestions.

 MSHDA-MI-HOPE@michgian.gov
- 51. Q. If we apply for a higher level of funding, is it possible that we would get a partial award? Would this be more dependent on the number of applicants?A. We have \$10 million dollars, and we want to do geographic distribution of the funding and spread it throughout the entire state. You should ask for what you have the capacity to get out the door in an expedited time frame. Don't ask for more expecting a cut, we will be looking at each application to ensure that they are realistic.
- 52. Q. Can an energy assessment qualify as a soft cost or service delivery cost as long as it is reasonable?A. As long as it is tied to a specific address you can bill that as either one though I would encourage you to bill it as a soft cost so it's the same across the board. Whatever costs that you start billing as activity delivery must be billed the same way for every address.
- 53. Q. Can program income funds we used as leverage for this program.

 A. If you are talking about CDBG program income that you have retained locally and is not being reported to MEDC currently then this would be an eligible activity. If you are talking about CDBG program activity that you are reporting to MEDC then you would need to consult with them to determine if this would be eligible. We aren't prohibiting it, but any other agencies funding rules would remain in effect.
- 54. Q. If an agency requests funding for an entire county and another applicant requests funding for a specific neighborhood or community within that county could both applications be approved?

 A. No. If both applicants, make the cut we will have a collaborative meeting where we will determine the boundaries that each agency will have but there will be no overlap of boundaries.
- 55. Q. If the nonprofit is owned by a person who has a builder's license to do the work themselves are they able to do the work themselves and the money goes back into the nonprofit?

 A. You would have to write a conflict-of-interest statement to disclose it and it would go to our legal team to review.

- 56. Q. What are the payment options for the contractors?
 - A. You would be able to define the payments terms in the contract with the contractor.
- 57. Q. Are applicants working within the City of Detroit sending their information into the same email address once we get past this stage?
 - A. No, if you are serving the area within the City of Detroit boundaries you will have a separate application process. We are not a part of that process.
- 58. Q. Do you know when that application for programs within the City of Detroit will be available?
 - A. We don't know that though they will not have access to the funds until after September 1st.
 - *Colundra Jones from ECOWORKS mentioned that she could help give people information about the Detroit program. Her email address is cjones@ecoworksdetroit.org.
- 59. Q. If we have construction staff who are licensed builder and contractors can they provide one of the quotes.
 - A. Yes, they can provide one of the quotes.
- 60. Q. If we are nonprofit, who do we need to get support letter from.
 - A. You need one letter from you Authorized Official, that would be whoever is at the top of your agency, saying they support this submission. You would also need one from the community you are serving and if you are using leveraged funds, you will need a commitment letter from the organization supplying those funds.
- 61. Q. Will we be penalized in our application for not including energy assessments, since it's not determined yet?
 - A. No.
- 62. Q. Is part 1 of the application process being considered in the final scoring of the proposal or is just a way to get access to SharePoint to get access to the final proposal?A. The scoresheet is included in the Application Instructions on pages 13-15. Part 1 is pass/fail.
 - If you fail, we will not keep looking at your application, so you need to answer them carefully. To be determined is probably not enough.
- 63. Q. If we wanted to apply for funding for outside of the city of Detroit and still apply for the Detroit money is that allowed, or do you need to apply for it all as one?
 - A. You can do anything outside of the City of Detroit with this application, but you should not include the City of Detroit in this application. You will need to apply for that separately. You can include in your application you will also be applying for City of Detroit funding but leave the information for Detroit out.
- 64. Q. Will the funding for the Detroit grant end around the same time or will it start at a different time?

- A. The funding must be formally under contract by September 1, 2022. It will need to be fully expended by May 30, 2026.
- 65. Q. As an Economic Development agency, we service six counties. Are we able to able for all six counties in the one application and if so, are the application requirements the same?

 A. You can do just one application for all 6. Please include what your prioritization is of 1-6 in case we can't fund all 6 and we have to make a cut.
- 66. Q. What counties are these funds for?
 - A. The funds are for anywhere in the State of Michigan except for within the City of Detroit. It can be a county, city, village, or township, any government entity can apply. 30% has to go to rural areas and 5% to the Upper Peninsula.
- 67. Q. Do you have to go with the lowest qualified bid/estimate from licensed contractor? Or can the applicant/homeowner select who they want of the 2-3 estimates?
 - A. You are allowed to select who you want to perform the work as long as it's cost reasonable.
- 68. Q. What if we already have an award letter from a funder. Can we use that instead of getting a new letter?
 - A. Yes if it is dated within 120 days, otherwise you can get an email that says the letter is still valid and attach it to that letter.
- 69. Q. If there are two otherwise qualified applicants for the same geographical area/county, what is the process for resolving that? Would MSHDA mediate a solution, would it be remanded to the agencies to negotiate, or would there be some other administrative solution implemented? A. If internally, we determine that there is an overlap we will have a phone call including both organizations to determine how we will strategize the collaboration.
- 70. Q. What entity will approve the Detroit applications?
 - A. We are not involved with the City of Detroit process.
- 71. Q. Will there be an RFP for grant administrators to help new programs learn the systems?

 A. No, this is a local decision. We will be training new organizations.
- 72. Q. It was mentioned that at least 75% of the grant must be used for energy improvements but you have also that we could do a roof replacement only program and that would be acceptable. These 2 statements seem to be at odds to be, can you clarify?
 - A. The entire project, outside of administration, must be for energy improvements. We have defined all of the eligible activities as being for energy efficiency.

73. Q. Do we know yet what the reporting requirements will be?

A. There will be an outcome report and we are working on an Excel spreadsheet to collect the data we need to send to the US Treasury. We will be reporting on Subrecipient level not activity level.

74. Q. Can you spell out what SLFRF stands for?

A. United States Department of the Treasury American Rescue Plan (ARP) Coronavirus State and Local Fiscal Recovery Funds.

- 75. Q. What types of supporting documentation are required to certify financial hardship apart from exhibit D or to certify occupancy prior to March 3, 2021?
 - A. They should be able to give you an electric or mortgage bill or tax documents from before March 3, 2021, that proves that they lived there. We cannot change the date.
- 76. Q. Our Nonprofit is located in Detroit, can we service counties?

A. You can service Wayne County as long as you have proposed only service boundaries that are outside of the city limits.

77. Q. How long will it take for staff to turn around part 1 of the application.

A. It should be within 24 hours. If it takes more than 24h there is a problem, and you need to call us. You can call Tonya at 517-335-4337.

78. Q. What exactly does the energy assessment audit look like.

A. The best energy audit would include someone coming out and evaluating all of the home components including the ductwork, furnace, hot water heater, any air infiltration in the house that they could physically see. This way you can target your renovation to those areas. We encourage everyone to get a HERS Rater. This is the easiest way to populate an outcome report to show that you have increased the energy efficiency of a certain house. The energy audit is also nice because many of the things on the list are things that can easily be done by the homeowner, and they can choose to work on those things to improve the home as well. Further guidance will be provided to all selected entities.

- 79. Q. Are these funds available to households that do not have a financial hardship but still qualify at or below the 300% poverty level?
 - A. No, that would be difficult to find based on the definition of a Coronavirus hardship. Anyone who buys groceries, drives a car, or takes the bus has been negatively impacted by Coronavirus with prices going up. Use the Other box if they do not qualify for any of the other options and each will be evaluated on a case-by-case basis.
- 80. Q. How do you certify the financial hardship. Do you need documentation to prove it?

 A. No, this is a self-attestation certification form. Not additional documents are needed. We do not want to run into issues where we are collecting medical data which is PII.

- 81. Q. Are we able to set a technical Assistance call up?
 A. If you send a request to the MI-HOPE email box a meeting will be scheduled with our MI-HOPE team. MSHDA-MI-HOPE@michgian.gov
- 82. Q. To conduct an energy audit, do you need to be licensed or certified to do that? Can you contract that out as a soft cost?
 - A. It can be contracted out as a soft cost. It does need to be conducted by a legitimate person so if you have an issue with their qualifications, you can send the question to our Construction Manager. Most Community Action Agencies have someone on staff who can do that for you. You may also be able to partner with utility companies.
- 83. Q. Besides MSHDA funds are there any other funds that are unallowable to use as leverage/braiding funding?

 A. No.
- 84. Q. Is the City of Hancock eligible for this program?A. All areas of the state are eligible. We have a goal of assisting every county in Michigan.We are highly encouraging any programs located in counties that have not received funding in the past to apply.
- 85. Q. Can you give the names of the counties who have not received funding from the division? A. Yes, you can see the names of the counties where we have not funded any programs on the Counties Reached by Neighborhood Housing Initiatives Division Grants map on our website.
- 86. Q. Is there someone I can talk to who works in the region with Idlewild who can talk to them to help bring them on board?
 - A. You can tell them that this is the same division who they received their grant from in the past in 2014. That was for demolition and blight removal.
- 87. Q. Regarding leverage funds what is the ratio to amount asking for in grant?
 - A. This MI-HOPE grant does not require leverage; however, our team recommends leverage to maximize household energy savings impact. Leveraged funds are being used as bonus points within the scoring so it is to your advantage to include all dollars and sources to the greatest extent possible.
- 88. Q. We are a Habitat affiliate covering two counties and would like to serve the rural communities is these two counties do we need supporting letters from every city, township, village?
 - A. You only need Letters of support from county administration. Cities, villages, or townships would be good but not necessary.

- 89. Q. Our City shares zip codes with another, but we are not proposing that same area. Just do not want to be appearing to have a competing service area request.
 - A. We are not going to be looking at zip codes when we evaluate service area overlaps so it should not be an issue as we will just be looking at geographic boundaries.
- 90. Q. We see that 25% of the MI HOPE grant funds can be used for emergency repairs. Our team is wondering if the audit requirement will be waived for these cases. We are thinking for example, if a client has a furnace that stops working in the winter, having to wait for an audit to be completed will cause the repairs to be put off and may put the client and their home in a high-risk situation.
 - A. Energy audits are required for the outcome report and, the energy audit should take minimal time to complete. If you do not have time to perform a NEAT or HERS audit, please utilize Home Energy Saver (lbl.gov), it is very quick to perform and will give your owner needed information for energy saving activities moving forward.
- 91. Q. We have identified some additional leveraged funds. Should we go ahead and include that in Attachment A, even though it will not match our initial application details? Or should we just report it later as part of our outcomes report
 - A. I recommend that you just include any secured leverage in Attachment A and include a note that it is different from Part 1. Leveraged funds are being used as bonus points within the scoring so it is to your advantage to include all dollars and sources to the greatest extent possible.
- 92. Q. We have a UEI number but are unable to activate our SAM account as they are having issues verifying our agency: (Rather than the SAM.gov screenshot can we submit the email showing our verified UEI number? We are hoping our verification issues will soon be resolved but do not want to miss the deadline.
 - A. Yes
- 93. Q. Expanding on question 9 on the FAQ sheet, would local ARPA funding being utilized for blight elimination be eligible to be considered as leveraged funds?
 - A. Yes
- 94. Q. From our research, we have received informal estimates for HERS audits of \$1750 and \$2499 per home. At this price, the minimum grant a homeowner could receive for the soft cost allowance to cover the audit is \$18,000, which may not be necessary for all recipients. This could price out recipients that may only need one or two critical repairs. Does MSHDA have a recommended alternative to HERS to perform the audit.
 - A. You can use <u>Home Energy Saver (lbl.gov)</u> instead of HERS with minimal cost or time. This tool will satisfy the project outcome reports.

Submission Guidance:

- Part 1 and Part 2 must be completed <u>in their entirety</u> or scoring will not be undertaken. Any differences between the two submissions needs to be clearly identified within Attachment 1 of Part 2.
- If you run into issues with Part 3 please notify us via the MSHDA-MI-HOPE@michigan.gov mailbox which is being actively monitored.
- Letters of support are acceptable in e-mail format.
- The page limits were established to alleviate people from sending in 1,000s of pages for minimizing scoring time. If your attachment is less than 3 pages over the limit that is acceptable however meeting page limit parameters is encouraged. Note: organizational charts are not included in the page count.
- If you have any technical issues please let us know ASAP the MSHDA-MI-HOPE@michigan.gov mailbox is being actively monitored.