City of Toronto's Modular Housing Initiative: The Need to Balance Fast Delivery with Stronger Management of Contracts and Costs – Management Status Update on Recommendations

Date: January 29, 2025
To: Audit Committee
From: Executive Director, Housing Secretariat and Executive Director, Corporate Real Estate Management
Wards: All

SUMMARY

On June 21, 2023, the Office of Auditor General (AGO) issued an audit report titled "City of Toronto's Modular Housing Initiative: The Need to Balance Fast Delivery with Stronger Management of Contracts and Costs" in relation to City's Modular Housing Initiative (MHI).

As a result of this audit, the AGO provided twenty (20) recommendations to enhance the efficiency and effectiveness of the MHI projects. In response to these recommendations, Housing Secretariat (HS), in collaboration with Corporate Real Estate Management (CREM) and CreateTO, formally committed to strategizing and developing a comprehensive implementation plan. The HS and CREM divisions have been engaged in a series of coordinated efforts to establish a more robust framework of policies, processes, programs and tools targeted at MHI projects. These measures ensure alignment with the recommendations and effectively address the key areas identified for improvement. HS and CREM remain focused on promoting sustainable improvements and are actively working to ensure that all the actions taken are in full compliance with the audit recommendations.

Council requested staff to provide a status update on the implementation of the recommendations to Audit Committee by the end of 2024. In response to that direction, this report presents a comprehensive overview of the implementation plan, providing a detailed account of the status of the recommendations. It outlines the progress made to date, categorizing the recommendations as fully implemented or partially implemented. The report further highlights the key milestones achieved, as well as ongoing efforts aimed at ensuring the full realization of the remaining recommendations, in alignment with the audit's objective.

Out of the twenty (20) recommendations, the divisions have self-assessed fifteen (15) recommendations as fully implemented. Work completed to implement recommendations

includes establishing improved financial and project controls and enhanced due diligence measures to ensure projects are executed more efficiently and meet quality standards, while minimizing risk and enhancing accountability through the clear articulation of roles and responsibilities. Five (5) recommendations are partially completed and are on track for completion before the end of 2025. These recommendations relate to tracking expenditures, ensuring the use of shared financial data, standard file documentation and retention, and a consideration of lessons learned from past modular housing projects.

Notably, these status updates have not yet been verified by the AGO. The AGO has a separate process to follow up on audit recommendations.

RECOMMENDATIONS

The Executive Director, Housing Secretariat and Executive Director, Corporate Real Estate Management recommend that:

1. City Council receive this report for information.

FINANCIAL IMPACT

This report has no financial impact.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in the Financial Impact section.

DECISION HISTORY

At its meeting on July 19, 2023, City Council adopted item AU2.7 - City of Toronto's Modular Housing Initiative: The Need to Balance Fast Delivery with Stronger Management of Contracts and Costs, which summarized twenty (20) recommendations from the Auditor General to enhance, both the efficiency and effectiveness of the Modular Housing Initiative projects. Through adoption of the item, Council directed the Executive Director, Housing Secretariat, Executive Director, Corporate Real Estate Management, and Chief Executive Officer, CreateTO to implement the recommendations as result of the audit.

https://secure.toronto.ca/council/agenda-item.do?item=2023.AU2.7

COMMENTS

Background

In April 2020, the City launched MHI as an urgent response to the COVID-19 pandemic to create new supportive homes quickly to relieve pressure on the City's shelter system and provide urgently needed homes with supports for residents experiencing homelessness. Modular housing, which is prefabricated housing built in a factory that is then transported to the project site where it is assembled, is considered a faster and a more cost-effective construction option than conventional construction methods. As showcased in many jurisdictions in North America, modular housing provides an opportunity to respond rapidly to the city's housing and homelessness crisis.

MHI aimed to rapidly create at least 250 new rent-geared-to-income and supportive homes across five projects. MHI combines federal grant and loan funding from Canada Mortgage and Housing Corporation (CMHC) with City capital grant funding and incentives. Four of five development projects under the MHI have now completed construction, providing 216, safe affordable homes with support services for people who were experiencing homelessness, previously living in shelters, or sleeping outdoors.

The Office of Auditor General performed an audit of five MHI project sites. The aim of this audit was to answer following questions:

1. Did the City comply with appropriate purchasing policies and procure modular home contracts in an open, fair, competitive, and transparent manner?

2. Is the City effectively managing its modular housing contracts and costs to ensure contract requirements are met?

3. Does modular housing result in faster delivery of housing and lower cost than traditional construction methods?

The audit was scoped to focus on projects funded under MHI, approved by City Council in April 2020 with funding from CMHC via the Affordable Housing Innovation Fund. This included five projects:

    a. 11 Macey Avenue
    b. 321 Dovercourt Road
    c. 540 Cedarvale Avenue
    d. 39 Dundalk Drive
    e. 175 Cummer Avenue

The Auditor General made twenty (20) recommendations to improve the management and delivery of the program, which were accepted by City staff and adopted by City Council.

Current Status of Recommendations

The following sections summarize management's assessment on the status of implementation of the twenty (20) recommendations detailed in item AU2.7, categorized in the five areas of opportunity identified by the Auditor General to strengthen controls over modular housing contracts and costs, as well as enhance the quality of reporting to City Council. The five areas of opportunity are:

A. Better Project Planning Before Budget Preparation
B. Strengthening Tracking, Monitoring, and Reporting of Project Costs
C. Establishing Contract Management Policies and Procedures
D. Strengthening Documentation of the Procurement Process
E. Better Information and Analysis to Assess Overall Program Effectiveness

Out of the twenty (20) recommendations, HS and CREM have self-assessed fifteen (15) recommendations as fully implemented. Work completed to implement recommendations includes establishing improved financial and project controls and enhanced due diligence measures to ensure projects are executed more efficiently and meet quality standards, while minimizing risk and enhancing accountability through clear articulation of roles and responsibilities. Five (5) recommendations are partially completed and are on track for completion before the end of 2025. These recommendations relate to tracking expenditures, ensuring the use of shared financial data, standard file documentation and retention, and a consideration of lessons learned from past modular housing projects. A detailed assessment of the status of implementation of each recommendation can be found in Attachment 1.

The below section highlights some of the key achievements made so far by fully implementing the fifteen (15) recommendations.

Key Achievements:

Better Project Planning and Budgeting Needed

HS and CREM have implemented a series of strategies, processes, and procedures to enhance project planning and budgeting, ensuring greater precision and alignment with best practices within the MHI. These includes:

- **Pre-Site Selection Due Diligence**: HS & CREM have enhanced surface investigations and due diligence on critical factors such as land and soil conditions, infrastructure, and servicing constraints prior to finalizing site selection. This proactive approach mitigates unforeseen challenges and ensures the feasibility of the selected site.

- **Cost Estimate Analysis**: HS integrates detailed cost estimates analysis into the site due diligence processes. This includes the assessment and inclusion of all financial implications associated with the preparation and development of project sites.

- **Comprehensive Cost Review**: HS has rigorous review and documentation process to account for all cost elements expected during the preparation of sites for operation. This ensures that all foreseeable expenses are identified and accounted for, thereby significantly reducing the risk of a budget deficit.

- **Program Governance Framework**: Through the implementation of a detailed Program Charter and Responsibility Assignment Matrix (i.e. a matrix that identifies parties responsible, accountable, consulted, and informed) for the MHI, HS and CREM have clearly defined the roles and responsibilities of all stakeholders. This framework

enhances accountability and ensures streamlined decision-making process.

- **Rezoning Compliance and Risk Mitigation**: HS and CREM ensure that rezoning requirements are in effect before the commencement of construction, including off site or factory construction. This significantly reduces the risk of potential delays, cost escalations and the need for storage or other unforeseen contingencies.

- **Council Updates**: To maintain transparency and compliance with the Council requirements, HS and CREM provide, at a minimum, annual progress reports to Council on modular housing projects that are in development, ensuring all stakeholders, including the public, remain informed of project progress and key developments.

Strengthening the Tracking, Monitoring, and Reporting of Project Costs

HS and CREM have undertaken several initiatives to enhance the tracking, monitoring, and reporting of project costs for MHI. These measures are aimed at improving financial oversight, ensuring accuracy, and fostering accountability across all stakeholders involved in the MHI projects. Below are some key outcomes:

- **Identification of Gaps and Development of Financial Tools**: A comprehensive mapping of MHI financial processes has been conducted to identify existing gaps and clarify the roles and responsibilities of all stakeholders. This exercise has facilitated the development of financial tools, templates and streamlined processes, enabling greater insight into project costs, and eliminating redundancies.

- **Site-Specific Cost Tracking**: To improve cost allocation and monitoring, HS has established site specific cost accounts in the City's accounting system for tracking expenses at the site level. This ensures that costs are accurately identified and booked, providing a more granular understanding of actuals. Additionally, processes have been implemented to ensure actuals are consistently booked to the corresponding cost accounts.

- **Reconciliation of Historical Costs**: A thorough review and reconciliation of costs for the MHI projects have been completed to validate the accuracy of costs allocations within the City's accounting system. This ensures that all expenses are correctly booked to their respective cost centers, thereby improving financial accuracy and reliability.

- **Ongoing Review and Validation of Expenses**: HS and CREM have established a rigorous process for reviewing, analyzing and validating MHI project expenses to maintain accurate cost tracking. This includes verifying that costs are appropriately assigned to the correct accounts and conducting detailed reviews of invoices and their supporting backup documentation.

Strengthening the Review Processes for Change Orders and Invoice Payments

HS and CREM have established proactive measures to ensure robust oversight and accountability in handling change orders and invoice payments within the MHI projects. Some of the measures include:

- **Procedures and Processes**: CREM has made significant efforts in strengthening its review processes for change orders and invoice payments in MHI projects, to ensure accountability and accuracy. A robust "Change Control Plan Procedure" has been developed and implemented, clearly outlining the specific steps for executing change orders, including staged approval steps from change consideration to its full implementation.

- **Payment Certifier**: CREM has engaged a Contract Administrator who serves as Payment Certifier for the program. A detailed process has been established for the review of progress payments. This includes verifying that the progress of work aligns with what is being billed, and that the City has all required documentation before payment processing.

- **Over Payment Recovery**: CREM has received validated credits for projects, based on the markup charges identified by the Auditor General, where recoverable funds were available.

- **Contract Amendment**: The Supplementary Conditions to the contract language was amended to include and clarify project management fees and markups against Change Orders for our modular projects.

Establishing Formal Contract Management and Project Management Policies and Procedures

CREM and HS have made significant changes and introduced several procedures to implement formalized policies and procedures related to contract and project management for MHI projects. Key improvements include:

- **Project Delivery Process Map**: CREM has implemented a comprehensive Project Delivery Process Map that is supported by formalized and documented procedures for the program. These procedures include:
  o Control and monitoring processes to enhance vendor management and budget management, including implementing Procurement Management and Materials Division's process on vendor performance management which is aligned with the trade agreements with the City; and
  o Financial and Administrative close out process to enhance project reconciliation and hand over procedures.

- **Key Performance Requirements and Deliverables**: For existing and future modular and rapid build projects, the key performance requirements and deliverables will be outlined to the supplier through the Request for Proposal process, which will also form a component of the contract language. Contractor Performance Evaluation Forms are also used to track supplier performance and provide feedback for improvement and corrective actions. Contractor reviews are performed by the CREM project team and third-party consultants to ensure the quality and design of the components being manufactured meet the performance requirements during construction as well as after completion.

- **Document Sharing and Retention**: HS and CREM have created a joint shared SharePoint site to document and house all the MHI project related information. Additionally, HS has created a Document Process Guide, taking into consideration the Toronto Municipal Code, Chapter 217. The purpose of this site is to:
  o Establish a framework for file documentation, retention, and creation;
  o Identify roles and responsibilities of all the stakeholders in document management; and,
  o Establish efficient process in relation to document sharing and collaborative working.

- **Warranty Management**: A Warranty Management process was developed for MHI projects which ensures:
  o The housing provider is familiar with the warranty process and the operations & maintenance manual is shared with the operator; Additionally, a building walkthrough to be conducted with the operator.
  o Efficient tracking and monitoring of warranty claims and effectively addressing any tenant and operator issues.
  o All project documentation pertaining to warranty and close out are retained within the site-specific project folder.

Status of Outstanding Recommendations

Work is underway to fully implement the following five (5) outstanding recommendations:

Recommendation # 7.b: *Develop and implement a process to ensure consistent financial data is shared and used by all parties for reporting purposes of modular housing projects.*

- This recommendation is partially implemented and is expected to fully implemented by the second quarter of 2025.

- HS and CREM have developed several financial tools to monitor and track financial information for MHI projects. This is an ongoing effort as teams are developing more financial templates to ensure consistent use and sharing of the financial data.

- Although HS and CREM have developed the SharePoint site to share and document information pertaining to MHI programs, additional work is required to create the necessary subfolders to house financial data and grant access to relevant stakeholders.

Recommendation # 11: *City Council request the Executive Director, Housing Secretariat to develop formal policies and procedures and reporting templates for the purpose of tracking actual expenditures against initial budgets on a line-by-line basis (e.g. permit fees, manufacturing costs), on a project site basis and on an overall project basis.*

- This recommendation is partially implemented and is expected to be fully implemented by the first quarter of 2025.

- HS has developed new templates for tracking projects. Actual project and program expenditures can now be tracked and compared against the project budgets. The

division is currently engaged in developing a comprehensive process guide that will enable the tracking of project budgets on a line-by-line basis.

Recommendation # 17: *City Council request the Executive Director, Housing Secretariat, in conjunction with the Executive Director, Corporate Real Estate Management Division, and CEO, CreateTO, to develop, implement, and comply with a standard file documentation and retention policy for the program, aligned with the City's policy on record retention. The policy should specify documents to be created and retained (and retention length), especially for any information supporting significant decisions made during the process.*

- This recommendation is partially implemented and is expected to be fully implemented by the second quarter of 2025.

- Although HS and CREM have developed the SharePoint site to share and document information pertaining to MHI programs, additional work is required to create necessary subfolders and grant access to relevant stakeholders.

Recommendation # 19.C: *A consideration of lessons learned from past projects.*

- This recommendation is partially implemented and is expected to be fully implemented by the second quarter of 2025.

- HS has developed a comprehensive "Lessons Learned Manual" and has begun carrying out assessments of completed MHI projects. Going forward, the Division will complete a lesson learned for each MHI project within one year of project completion. The lessons learned manual provides a formalized approach to identifying and implementing lessons learned in the delivery of modular housing.

- This manual provides a guide on how to identify lessons learned from completed projects, and forms part of the project management process. This manual and related documentation will allow stakeholders to review best practices and required tasks prior to proceeding on to future project stages.

Recommendation # 20.a: *Tracking and monitoring overall costs, including the long-term maintenance and capital cost requirements of completed modular housing.*

- This recommendation is partially implemented and is expected to be fully implemented by the third quarter of 2025.

- CREM currently manages and tracks the overall project construction budget for MHI projects. HS has worked with CREM to establish a live budget tracker on each project to monitor construction costs, housed within the shared SharePoint site. HS will work with CREM to establish a reporting cycle through the lessons learned document at the end of each project to better analyze and determine if modular housing is more cost effective and efficient to build in comparison to other rapid build options and traditional construction. This is in a template form and will be used to review other modular

projects.

- HS will lead a process, in collaboration with other City Divisions and stakeholders, to document, analyze, and report back on the long-term maintenance and capital cost requirements of completed modular housing.

With the implementation of the fully addressed recommendations, HS and CREM the divisions have established several efficient processes that contribute towards the success of MHI projects. The divisions are committed to addressing the outstanding recommendations before end of 2025.

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ATTACHMENTS

Attachment 1: Management's Assessment of the Status of Recommendations – To Be Verified by the Auditor General's Office

ATTACHMENT 1: MANAGEMENT'S ASSESSMENT OF THE STATUS OF RECOMMENDATIONS – TO BE VERIFIED BY THE AUDITOR GENERAL'S OFFICE

Rec. No.	Theme	Recommendations	Status
1	Better Project Planning Needed Prior to Preparation of Project Budget	City Council request the Executive Director, Housing Secretariat, through the Executive Steering Committee for site selection, to: a. Perform subsurface investigation and due diligence on land/soil and infrastructure and servicing constraints prior to the final decision on site selection;	Fully Implemented
		b. Obtain from the Corporate Real Estate Management Division a cost-estimate analysis of site remediation to be included in the development of site budgets; and	Fully Implemented
		c. Provide the above information to the proponents in the request for proposal (or to the contractor early on in the project) to facilitate a more accurate price quote and project cost estimate.	Fully Implemented
2	Better Project Planning Needed Prior to Preparation of Project Budget	City Council request the Executive Director, Housing Secretariat and the Executive Director, Corporate Real Estate Management Division, in the budget development process for future modular housing projects, to: a. Conduct a review to understand all cost elements (construction and non-construction) that would be expected to be incurred in preparing a site ready for operation;	Fully Implemented
		b. Include the above cost elements for budget development;	Fully Implemented
		c. Document assumptions used for the estimated budget numbers; and	Fully Implemented
		d. Clearly define which party is responsible for managing each cost item within the budget.	Fully Implemented

3	Manufacturing of Modular Units Should Not Start until after Re-Zoning Approval of Project Site	City Council request the Executive Director, Housing Secretariat to ensure the re-zoning is in effect before beginning construction of future modular units, to reduce the risk of potential delays and additional costs related to storage, transportation, and other costs that may be incurred in trying to re-purpose or sell the modules.	Fully Implemented
4	Manufacturing of Modular Units Should Not Start until after Re-Zoning Approval of Project Site	The City Council requests the Executive Director, Housing Secretariat to continue to discuss and negotiate with funding provider(s) more reasonable timelines for future modular housing projects.	Fully Implemented
5	Requesting Approval of City Council for Increased Budgets and Keeping Them Informed	City Council request the Executive Director, Housing Secretariat to improve reporting processes and transparency in the budget development process by submitting: a. An updated site-specific budget to City Council at the time of site selection, after conducting the necessary due diligence work, and in compliance with any funding agreements executed between the City and other orders of government or funder(s); and	Fully Implemented
		b. For City Council's approval, any financially material request(s) to increase the budget by modular housing project site and the rationale for the additional budget request(s).	Fully Implemented
6	Requesting Approval of City Council for Increased Budgets and Keeping Them Informed	City Council request the Executive Director, Housing Secretariat to report to City Council regularly on the progress of the modular housing projects. Such reports are to include, but not be limited to: a. Comparison of original timeline and actual schedules, with explanations for significant delays;	Fully Implemented
		b. Actual final costs for completed sites and projected costs for ongoing sites, compared with initial budgets, with explanations for any significant variances; and	

		c. Details of funding being allocated or reallocated to cover the additional costs.	
7	Develop a Process to Ensure Consistent Financial Data Is Used in Reporting	City Council request the Executive Director, Housing Secretariat, in conjunction with the Executive Director, Corporate Real Estate Management Division and the CEO, CreateTO, to: a. Clarify in writing, the roles and responsibilities for each of the parties involved in the modular housing project management process, ensuring they are clearly understood; and	Fully Implemented
		b. Develop and implement a process to ensure consistent financial data is shared and used by all parties for reporting purposes of modular housing projects.	Partially Implemented
8	Revising the Financial System Coding Will Facilitate Better Tracking and Monitoring of Project Costs	City Council request the Executive Director, Housing Secretariat to revise the financial system coding (i.e. cost centres) to assign future budget and actual costs by site, in order to reflect the accurate budget and most up-to-date costs in the financial system.	Fully Implemented
9	Perform Variance Analysis to Monitor Project Costs and Identify Cost Drivers	City Council request the Executive Director, Housing Secretariat in conjunction with the Executive Director, Corporate Real Estate Management Division to conduct a thorough review and reconciliation of existing costs in the system to ensure all costs incurred to date for Phase One and Phase Two modular housing projects have been captured and allocated to the correct accounts.	Fully Implemented
10	Perform Variance Analysis to Monitor Project Costs and Identify Cost Drivers	City Council request the Executive Director, Housing Secretariat to: a. Develop and implement a process for cost recording of modular housing projects to ensure all future costs (including all hard and soft costs) are captured and allocated to the correct site-specific cost centre and cost account;	Fully Implemented

		b. Perform timely and regular cost allocation to sites specific cost centers for future invoices that contain costs for multiple sites; and	Fully Implemented
		c. Develop a process to review the entries booked by other divisions in the financial system to ensure their accuracy and completeness.	Fully Implemented
11	Perform Variance Analysis to Monitor Project Costs and Identify Cost Drivers	City Council request the Executive Director, Housing Secretariat to develop formal policies and procedures and reporting templates for the purpose of tracking actual expenditures against initial budgets on a line-by-line basis (e.g. permit fees, manufacturing costs), on a project site basis and on an overall project basis.	Partially Implemented
12	Change Orders Should Be Reviewed and Approved Prior to Payment	City Council request the Executive Director, Corporate Real Estate Management Division, in consultation with the Executive Director, Housing Secretariat, to ensure consistent compliance with the new change order process for all future modular housing projects by finalizing the development of the change control process and protocols, and including the following steps: a. Complete the negotiation of change order work on a timely basis and ensure work is not started until the Executive Director, Corporate Real Estate Management Division approves the change order request;	Fully Implemented
		b. Obtain and review supporting documents from the contractor for each change order and require approval of change orders before payment is made; and	Fully Implemented
		c. Clearly define the roles and responsibilities of the third-party contractor, if one is employed as the Payment Certifier or Contract Administrator on behalf of the City for both payment certification and the review and approval of change orders.	Fully Implemented

13	Reviewing Monthly Invoices and Inspection of Work Progress Documentation	City Council request the Executive Director, Corporate Real Estate Management Division for Phase Two and future modular housing projects to: a. Develop and implement a process to review the process payment invoice to ensure it is accurate and reflects the updated work progress;	Fully Implemented
		b. Verify work progress through on-site inspections and document the review; and	Fully Implemented
		c. Ensure all file review questions and comments are adequately addressed, documented and retained.	Fully Implemented
14	Clarification Required for Markups and Project Management Fees	City Council request the Executive Director, Corporate Real Estate Management Division, in consultation with City Legal Services, to: a. Assess whether the project management fees and markups were reasonably charged;	Fully Implemented
		b. Seek to recover any overpayment, if the project management fees and markups are not reasonably charged by the contractor; and	Fully Implemented
		c. Assess whether there is a need to amend future contracts for project management fees and change order markups in order to provide clarity on interpretation.	Fully Implemented
15	Formal Contract Management and Project Management Processes Should Be in place	City Council request the Executive Director, Corporate Real Estate Management Division, in consultation with Chief Procurement Officer, for Phase Three and future modular housing projects to: a. Implement a vendor performance management process to address the unique requirements of modular housing projects;	Fully Implemented
		b. Summarize a list of key performance requirements and deliverables from the modular housing contracts;	Fully Implemented

		c. Monitor and evaluate the contractor's performance and quality of design and manufacturing throughout and after the completion of the project; and	Fully Implemented
		d. Identify, document, and resolve any contractor performance, design, and manufacturing issues.	Fully Implemented
16	Formal Contract Management and Project Management Processes Should Be in Place	City Council request the Executive Director, Corporate Real Estate Management Division, in consultation with the Executive Director, Housing Secretariat, to finalize its project management processes, including but not limited to project cost tracking, progress payment invoice review, project close-out and contractor performance monitoring, and ensure compliance with those processes.	Fully Implemented
17	Need to Standardize Policies and Procedures on Document Retention	City Council request the Executive Director, Housing Secretariat, in conjunction with the Executive Director, Corporate Real Estate Management Division, and CEO, CreateTO, to develop, implement and comply with a standard file documentation and retention policy for the program, aligned with the City's policy on record retention. The policy should specify documents to be created and retained (and retention length), especially for any information supporting significant decisions made during the process.	Partially Implemented
18	Develop Guidelines on Warranty Management	City Council request the Executive Director, Corporate Real Estate Management Division, in consultation with the Executive Director, Housing Secretariat, to develop a warranty management process, including actively monitoring any event(s) of repairs and damages on the modular housing buildings after building occupancy.	Fully Implemented

19	Lessons Learned Could Be Timelier and Include More Areas of Review	City Council request the Executive Director, Housing Secretariat to conduct and document on a timely basis, a more formalized lesson learned review after each past and future modular housing project is completed, to be completed within one year of the modular housing project completion and by the end of the second quarter of 2025 for all previous modular housing projects, which should include: a. Inputs from all participating divisions of the project team;	Fully Implemented
		b. A review of contract design, procurement of the contractor, cost and budget management, contractor performance, and operations; and	
		c. A consideration of lessons learned from past projects.	Partially Implemented
20	Modular Housing versus Traditional Housing Construction to Achieve Supportive Housing Supply Goals	City Council request the Executive Director, Housing Secretariat to analyze and determine if it is more cost effective and quicker to build using modular construction, when compared with traditional methods, by: a. Tracking and monitoring overall costs, including the long-term maintenance and capital cost requirements of completed modular housing; and	Partially Implemented
		b. Obtaining more external benchmarking information as it becomes available.	Fully Implemented