

Fall 2023 Edition

The CA Quarterly Review



FROM THE DESK OF LAYLA HAYAVI NTHDC Director and Contract Administrator

Dear Owners, Agents, and Industry Colleagues,

On behalf of the NTHDC staff, I want to thank all the Owners and Agents for your continued hard work and dedication to your property and residents. There are numerous regulatory changes happening all at once, and it is going to take all of

us working together to navigate the new regulations and how they should and must be implemented at your properties. Please stay tuned for future updates and training opportunities.

Hot off the presses, HUD issued HUD <u>Notice 2023-10 Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)</u>. HOTMA is going to significantly change the way that we calculate income and assets for the recertification process, so be sure to get you and your staff up to date on all the new requirements. We have provided information on HOTMA in this edition of the CA Quarterly Review and will be providing more information as it relates to the Implementation Guidance in the next edition.

Again, thank you and we look forward to working with you as we implement the new changes.

Layla Hayavi NTHDC Director and Contract Administrator

"Autumn, the season that teaches us that change can be beautiful."

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HUD REMINDS OWNERS ABOUT COMMUNITY ROOM REQUIREMENTS FOR TENANT ORGANIZING ACTIVITIES

If your property is covered under §245 of 24 CFR, you and your agents must reasonably make available the use of any community room or other available space appropriate for meetings that is part of the multifamily housing project when requested by:

- Tenants or a tenant organization and used for activities relat-1. ed to the operation of the tenant organization; or
- Tenants seeking to establish a tenant organization or collec-2. tively address issues related to their living environment.

Under this regulation, tenants can engage in protected activity as outlined in the 24 CFR §245 as long as they are a legitimate tenant organization defined in §245.110.

There are important benefits to both the tenants and the property when tenants are allowed to participate in creating and maintaining a suitable living environment.

If your property is not covered by §245, you are not required by regulation to adhere to this section. However, HUD strongly urges you to do so to promote mutual respect and good faith between Owners/Agents and tenants.

To submit an idea or suggestions for future publications or to register for the mailing list, Please visit the NTHDC website or send an email to jenifer.marrs@cgifederal.com

THE IMPORTANCE OF UNIT INSPECTIONS FOR PROACTIVE PEST CONTROL As the leaves start changing and the temperature starts dropping, it's that time of year when pests, particularly rodents, start gravitating towards the indoors. Although pests can be a problem year-round in most places, some specifically move indoors in the Fall and Winter months to stay warm. It would be good practice, if not already done on a regular basis, to perform monthly pest/housekeeping inspections. Most properties, such as elderly/disabled buildings, usually engage in monthly or quarterly preventative treatments and pest/housekeeping inspections. One of the main reasons for this is that all residents are not always forthcoming on reporting pest issues for a variety of reasons, such as worried about cost, lease violations, etc. This is a good practice to help identify residents with housekeeping issues that may be lending to the pest problem in the building. This leads to the next issue, hoarding. The PBCA Call Center receives numerous hoarding problems in all states served which are contributing to massive pest issues on the properties and not enough is being done, in some cases, to address these issues. Hoarding things, regardless of what it may be, is also a huge fire hazard and potential liability for management. It also affects the ability for exterminators to properly treat a unit for mice, roaches, bed bugs, etc. Hoarding provides a perfect environment for pests. After a certain point, an exterminator will refuse to even treat an apartment if the housekeeping issues are not addressed by the tenant. So be sure to be proactive and inspect those units! 2

MEMBER SPOTLIGHT

Introducing Jasmine Coke

If you have ever called our office or are part of a property assigned to Jasmin, you have heard the friendly voice we are lucky to have as part of our team. Customer service is a high priority within NTHDC and Jasmin Is a great example the service we strive to provide.



Jasmine Coke, Central Contract Specialist

Explain your position with NTHDC? Central Contract Specialist – manage a portfolio of properties overseeing the contract renewals, rent adjustments, vouchering and special claims. I also manage the incoming mail and redirect calls to the appropriate staff.

How long have you been with NTHDC? 5 years.

What was your background prior to joining NTHDC? Before joining NTHDC, most of my experience was in the hospitality industry. I have worked for restaurants, hotels, and travel services.

What are your hobbies? Things you enjoy doing after you leave the office? Outside of work, I am passionate about health and fitness, entertainment (especially retro music and tv shows), food and travel.

What brings you the most satisfaction in your day-to-day tasks? I love playing a small part in providing safe and affordable housing to our community.

What is the best piece of advice that you could provide to an owner/ agent? We are all working as a team to complete our goals and provide the best service possible. Never be afraid to ask a question or to answer one coming from your CA.

FY2024 FMR PUBLISHED

FY2024 Fair Market Rents Published

HUD has posted the FY2024 Fair Market <u>Rents</u>, to be effective 10/01/2023.

HUD also posted FAQs on the FY24 FMRs available here.

DIRECT ELECTRONIC SUBMISSIONS AS FOLLOWS:

VOUCHERS voucher@cgifederal.com

SPECIAL CLAIMS

specialclaim@cgifederal.com

MOR RESPONSES

tampageneralmailbox@cgifederal.com

CSP CLAIMS

CSPClaims@cgifederal.com

HUD ANNOUNCES FUNDING TO SUPPORT ENERGY EFFICIENCY AND CLIMATE RESILIENCE IN MULTIFAMILY ASSISTED PROJECTS

HUD has awarded nearly \$18 million in funding and loan commitments under the <u>Green and Resilient Retrofit Program</u> (<u>GRRP</u>), which aims to provide funding for direct loans and grants to fund projects that improve energy or water efficiency, enhance indoor air quality or sustainability, implement the use of zero-emission electricity generation, low-emission build-ing materials or processes, energy storage, or building □electrification strategies, or address climate resilience, of eligible HUD-assisted multifamily properties.

There are more awards expected to be issued throughout 2023 and 2024. These investments will help combat the climate crisis and support equitable economic development in American communities. The funding enables building owners to invest in a range of technologies, such as geothermal energy systems, heat pumps, insulation and air sealing, wind- and fire-resistant roofing, low embodied carbon materials, and other measures, that will reduce energy costs and greenhouse gas emissions and make properties healthier and safer for residents in the face of more severe weather and changing climate. This is the first round of GRRP awards to be released, with additional rounds to be awarded throughout 2023 and 2024. You are encouraged to read HUD's Press Release.

The program's Notices of Funding Opportunity (NOFO) and additional guidance released on May 11, 2023, detail the multiple grant and loan funding options that property owners can apply for under the program's three categories:

- <u>Elements</u> provides funding to owners to include proven and meaningful climate resilience and utility efficiency measures in projects that are already in the process of being recapitalized.
- <u>Leading Edge</u> provides funding to owners with plans for ambitious retrofit activities to achieve an advanced green certification.
- <u>Comprehensive</u> provides funding to properties with the highest need for climate resilience and utility efficiency upgrades, regardless of prior development or environmental retrofit experience.

Property owners are strongly encouraged to continue to submit applications for grant awards or loans in any of the three categories. HUD is accepting applications under one category each month for the duration of funding availability. HUD expects to announce awards regularly throughout 2023 and 2024.



TREATMENT OF FINANCIAL BENEFITS TO HUD-ASSISTED TEN-ANTS RESULTING FROM PARTICIPATION IN SOLAR PROGRAMS

Last month HUD posted <u>HUD Notice 2023-00</u>, Treatment of Financial Benefits to HUD-Assisted Tenants Resulting from Participation in Solar Programs. This article aims to summarize that information, but it is recommended that you read the source guidance for full comprehension and how it impacts multifamily Project-Based Section 8 Projects. The notice provides guidance on the treatment of financial benefits received by HUD-assisted tenants from participation in a community solar program or the presence of an on-site solar facility. The notice helps the owner/agent community determine whether and how much of the financial benefits are factored into either the utility allowance baseline analysis for the project or individual tenant income calculations.

If a project has on-site solar panels, where electricity does not pass through a meter, the owner/agent must distribute these financial benefits to tenants regardless of whether or not the tenant units are individually metered. On the other hand, the project may be unsuitable for solar panels and therefore instead participates in a Community Solar Program of some sort. Community Solar Programs provides people residing in projects that are unsuitable for solar panels with the opportunity to subscribe to community solar arrays. Subscribers will then receive credits on their utility bills that are directly attributable to the solar project's energy generation. These subscribers may be tenants who receive financial benefits directly, either through individual metering or sub-metering, or owners of master-metered properties, who must then distribute such financial benefits to tenants.

You may be working in a project that has either on-site solar panels or access to a community solar program. This is becoming more and more common as we strive to use cleaner self-sustaining energy. Project owners of multifamily housing that participate are providing a valuable service to their tenant population. They are lowering their carbon foot print by participating in solar programs. There have been numerous sources of funding for such programs, many being funded by grants. Some of these grant programs require that the owner pass along the financial benefits to the tenant population, which is what is addressed in HUD Notice 2023-09. Tenants in HUD assisted projects that participate in either community solar or on-site solar will either:

Receive a direct financial benefit, like a credit on their utility bill Receive an indirect financial benefit, some sort of benefit distributed by the owner/agent

The question that the owner/agent must then ask themselves: will that financial benefit be factored into the tenant's utility allowance or included in the tenant's annual adjusted income?

The following step by step guidance is direct from the HUD Notice for the owner/agents to make these determinations.

Step One: Determine if Solar Credits Affect Utility Allowance Calculation

Step One is a test for determining the solar credit's relationship to the utility allowance calculation. To understand the effect of a community solar credit on a unit's utility allowance calculation, you will need a copy of the tenant's electricity bill (this can be accessed by the utility company if it is not already available). Per this guidance, you will not need any additional information as the solar credit will appear as a negative amount on the tenant's electricity bill.

If the credit reduces the cost of energy consumption by lowering actual utility rates, then the owner is required to submit a new baseline analysis in accordance with Housing Notice 2015-04, regardless of when the last analysis was submitted to HUD/Contract Administrator for approval.

Factors for determining whether the credit is tied to the cost of consumption:

- Is the credit a third-party payment (e.g., not from the electricity provider) on behalf of the tenant rather than a reduction in the cost of utilities?
- If "yes," then the credit is not considered to reduce the cost of energy consumption as the cost for the utility provider to provide the consumed energy does not change. The owner is not required to submit a new utility allowance baseline analysis
- If "no," then the credit may be tied to the cost of consumption. Proceed to question B below
- Does the credit amount fluctuate every month based on consumption (i.e., not based on solar output) and/or does the electric bill show a lowered utility rate per kilowatt-hour?
- If "yes," then the credit is tied to the cost of utility consumption. The owner is required to submit a new utility allowance baseline analysis.
- If "no," then the credit is not tied to the cost of utility consumption. The owner is not required to submit a new utility allowance baseline analysis.



Step Two: Determine if Solar Credits Should be Considered Annual Income for Rent Calculation or Determining Eligibility for HUD-assisted Multifamily Programs

The second step is to determine if the credits fall within HUD's definition of annual income. In all foreseeable instances as of the date of this Notice, if the solar credit is tied to the cost of consumption (i.e., utility allowance is affected) (addressed in Step One), then the credit will not count toward income.

If a solar benefit appears on a household's electricity bill as an amount credited from the total cost of the bill, HUD has determined that the credit should be treated as a discount or coupon to achieve a lower energy bill (rather than a cash payment or cash-equivalent payment being made available to a resident). In this case, the credit will not be counted toward income, as discounts on items purchased by a tenant are not viewed as "annual income" to the family. Generally, income is not generated when a family purchases something at a cheaper rate than it otherwise would. Note that if the credits are found to be third-party payments based on Step One, there may be instances when the credits are not mere discounts and must be treated as income. For instance, a recurring monthly utility payment made on behalf of the family by an individual outside of the household is not considered a discount but is considered annual income to the family.

The notice concludes by discussing indirect benefits received by the tenants and whether or not the owner/agent should factor these into the tenant's income calculations. There is a chart outlining the different indirect benefits that could be achieved from participation in solar programs and whether or not those should be considered when calculating a tenant's income. Again, it is recommended that you read the full <u>HUD Notice 2023-09</u> for complete guidance.



REVIEW OF SPECIAL CLAIMS SUBMISSION REQUIREMENTS

As summer comes to an end, you may find yourself with a lot of special claims to file after a season of move-outs and move-ins. If that is the case, please review the required submissions below in order to expediate the processing of your special claim.

Regular Vacancy Claim

- Occupieted, signed, and dated HUD-52670-A Part 2
- \Diamond ~ Completed, signed, and dated HUD-52671-C ~
- ◊ Completed Special Claim for Regular Vacancies Checklist
- Copy of the signed Move-in HUD-50059 (MI certification) for the former tenant (move-out tenant) that shows the amount of the security deposit
 - ◊ Please ensure all PII is redacted prior to sending
- \diamond Documentation that the appropriate security deposit was collected from the move-out tenant
- O Possible documents—copy of original lease, copy of the tenant's ledger, copy of the receipt(s) of payment
- ♦ Copy of the Security Deposit Disposition Notice provided to the tenant which includes the following:
 - -Move-out date
 - -Amount of security deposit collected at MI
 - -Amount of security deposit returned

-List of any charges withheld from the security deposit for unpaid rent, tenant damages, or other charges due under the lease

- Copy of the waiting list that <u>includes the move-in tenant</u> and enough of the surrounding waiting list to provide clear evidence that tenant was selected in proper order
 - Best practice—At a minimum you should provide the <u>month prior</u> to application, the <u>application month</u> and then the <u>month following application</u>
 - \diamond If the unit was not filled from a waiting list, provide documentation of marketing efforts
 - Possible documentation—copies of advertising or invoices for advertising expenses that provide the date marketing occurred in accordance with the AFHMP
- \diamond Reconditioning Log or Maintenance Record that verifies the date the unit was ready for occupancy

Unpaid Rent Claim

- Occupieted, signed, and dated HUD-52670-A Part 2
- ♦ Completed, signed, and dated HUD-52671-A
- Occupied Special Claim for Unpaid Rent Checklist
- Copy of the signed Move-in HUD-50059 (MI certification) for the former tenant (move-out tenant) that shows the amount of the security deposit
 - ◊ Please ensure all PII is redacted prior to sending
- Occumentation that the appropriate security deposit was collected from the move-out tenant
 - O Possible documents-copy of original lease, copy of the tenant's ledger, copy of the receipt(s) of payment
- ♦ Copy of the Certified Letter sent to the tenant including the following:
 - -Detailed list of unpaid rent and other charges due under the lease
 - -The disposition of the security deposit
 - -A demand for payment
 - -Warning that a failure to pay the sums due will result in the matter being turned over to a collection agency

-Explanation of the former tenant's right to discuss the charges with the O/A

- Occumentation that the matter was turned over to a collection agency AND documentation that the collection agency has attempted to collect the debt
- ♦ Possible documentation—copy of the agency's first demand letter
- ◊ If applicable, documentation of HUD approval for other charges that were due under the lease
- ♦ Reconditioning Log or Maintenance Record that verifies the date the unit was ready for occupancy

Tenant Damage Claim

- ♦ Completed, signed, and dated HUD-52670-A Part 2
- \diamond Completed, signed, and dated HUD-52671-A
- Ocompleted Special Claim for Unpaid Rent and Tenant Damages Checklist
- Copy of the signed Move-in HUD-50059 (MI certification) for the former tenant (move-out tenant) that shows the amount of the security deposit
 - \Diamond \quad Please ensure all PII is redacted prior to sending
- \diamond $\;$ Documentation that the appropriate security deposit was collected from the move-out tenant
 - Possible documents—copy of original lease, copy of the tenant's ledger, copy of the receipt(s) of payment
- Copy of the Certified Letter sent to the tenant including the following:
 -Detailed list of unpaid rent and other charges due under the lease
 - -The disposition of the security deposit
 - -A demand for payment
 - -Warning that a failure to pay the sums due will result in the matter being turned over to a collection agency

-Explanation of the former tenant's right to discuss the charges with the O/A

- Documentation that the matter was turned over to a collection agency AND documentation that the collection agency has attempted to collect the debt
 - ◊ Possible documentation—copy of the agency's first demand letter
- 8 Reconditioning Log or Maintenance Record that verifies the date the unit was ready for occupancy
- ♦ Copy of the Move-in and Move-out Inspection Reports
- ◊ Itemized list of damages
- Observation Breakdown of costs to repair the damages
 - ◊ Possible documentation—invoices, receipts, copies of work orders, or maintenance records
- Copy of the Security Deposit Disposition Notice provided to the tenant that includes the following:
 -Detailed list of unpaid rent and other charges due under the lease
 - -The disposition of the security deposit
 - -A demand for payment
 - -Warning that a failure to pay the sums due will result in the matter being turned over to a collection agency

-Explanation of the former tenant's right to discuss the charges with the O/A

Certification that the damages are not a result of normal wear and tear or routine maintenance



VOUCHERING TIPS: TRACS VERSION 203A UPDATES

The current TRACS Version 202D, is being upgraded to 203A in order for HUD to accept data from Multifamily Housing (MFH) business partners that complies with updated policies and procedures. This upgrade will also encompass all requirements and changes under the *Housing Opportunity Through Modernization Act of* 2016 (HOTMA) *Final Rule* published in ther Federal Register on February 14, 2023 <u>Federal Register Volume 88</u>, <u>Issue 30</u>

TRACS VERSION 203A IMPLEMENTATION TIMELINE

Note: Dates are subject to change based on stakeholder feedback and/or OMB Forms approval.

TRACS 203A MAT User Guide - Specifications and Edits to the MAT Guide:

- Expected to be completed and posted to TRACS Documents page: <u>Multifamily Housing TRACS Documents -</u> <u>HUD</u> by June 30, 2023.
- This is assuming that OMB has approved all Voucher forms (50059, 50059-A, 52670, and Special Claim forms).

203A Testing - TRACS Database made available for both CA and OA software testing.

- Test phases will be rolled out in Sprints to encompass all 203A changes and HOTMA requirements.
- Testing dates are currently TBD.

203A Go Live Transition

- Proposed go live date is 12/1/23 (tentative).
- Go Live date is tentative as it is dependent on OMB forms approval.
- TRACS and CA software begins accepting both 202D and 203A Voucher and Certification transmissions.
- OA transition period will be determined and announced later.
- All certifications with an effective date of 1/1/24 and after <u>must</u> follow HOTMA rules.
 - All certifications that are effective in 2023 and submitted under 203A, pre-HOTMA rules are applied per the 203A MAT User Guide.
 - All certifications effective from 1/1/2024 through 4/30/2024 and submitted under version 202D, must be resubmitted as a correction within three months (the first three voucher submissions) of implementing 203A.
 - New HOTM Miscellaneous Adjustment Code:

If 203A certification corrections cannot be completed in 30 days or more prior to the effective date of the 2024 certification and if there is an increase to Tenant Rent, the OA has 90 days (three voucher submissions) to submit an HOTM Miscellaneous Accounting Request to offset the retroactive increase.

• Since 2023 vouchers are submitted using Pre-HOTMA rules, the HOTM Misc. Accounting Request Code is not valid on a 2023 voucher.

UPDATE: PREPARING FOR HOTMA

As summer concludes, all anyone can still talk about is the upcoming effective date of HUD's HOTMA Final Rule which will go into effect with certifications **effective January 1**, **2024**. With the implementation of Section 102 and 104 of HOTMA (Housing Opportunity Through Modernization Act of 2016), HUD will be making sweeping changes to streamline administrative processes and reduce burdens on PHAs and owners of housing assisted by Section 8 programs.

Owners must begin implementing the revised regulations for all tenant certifications of income effective January 1, 2024, and after. HUD has posted that a supplemental notice authored by MFH and PIH will provide additional implementation guidance to owners and PHAs. We expect HUD to provide the additional information this calendar year. For now, along with the resources and guidance provided on the <u>HUD HOTMA webpage</u>, here is some details about the changes that will need to be implemented starting with certifications effective January 1, 2024.

Under Section 102: Income Reviews

Annual Recertifications -

Family income determinations will be made using anticipated income for new admissions and interim reexaminations, and prior-year income for annual reexaminations.

New Income Exclusions -

HOTMA establishes new income exclusions, including payments related to civil rights settlements or judgments, veterans aid and attendance income, loan proceeds (such from student loans, car loans, etc.), distributions of principal from irrevocable trusts (including special needs trusts), and State or Tribal kinship or guardianship care payments.

Interim Recertifications -

Fewer IR's will be required as a tenant's adjusted annual income must show an increase/decrease of at least 10%. In addition, when considering an increase of adjusted annual income, an **O/A may not consider any increase in the earned income of the family** (unless the family has previously received an interim reduction during the current certification period) and can choose not to conduct an IR if within three months of next AR.

Deductions (Adjusted Income) -

The Elderly/Disabled Family Deduction will increase to \$525 (from the original \$400).

The \$480 Dependent Deduction will be adjusted annually for inflation.

HOTMA establishes a new hardship exemption for families ineligible for the Child-Care Expense Deduction. Families will continue to receive this deduction if they are unable to pay rent due to the loss of the deduction. This hardship exemption will be reevaluated after 90 days and may be extended for additional 90-day periods.

The Health and Medical Expenses and Auxiliary and Attendant Care Expenses Deduction will be increase from 3% of annual income to 10% of annual income—this change will be phased in over a two-year period: starting 1/1/2024 (and for the entire 2024 fiscal year) the **threshold will be 5%**.

HOTMA establishes hardship relief for families with increased medical/disability expenses or families who experience a financial hardship due to a change in circumstances, as defined in the owner's policies, that would not otherwise trigger an interim reexamination. Eligible families will receive a deduction for eligible expenses that exceed 5% of annual income. Hardship relief ends at the sooner of 90 days or when the hardship circumstance no longer applies. Owners may extend relief for additional 90-day periods while the hardship continues.

Calculation or Reporting Error -

HUD will overlook/forgive an error that results in a difference in the determination of a family's adjusted income of \$30 or less per month (\$360 in annual adjusted income).

Verification and Consent Forms -

EIV will no longer be required to be run at any point during an IR, but still for all other types of certifications.

Tenants must sign a consent form on or after January 1, 2024 (at their next recertification), but then never again during their tenancy—once the HUD-9887 has been signed come the new year, it will not need to be signed at any of the following recertifications.

Under Section 104: Asset Limitation and Program Eligibility

At a family's next reexamination after 1/1/2024, the family will be evaluated for compliance with the new asset limitations requirements and changes that include:

- Families who have net family assets that exceed \$100,000 will not be eligible for Section 8 assistance;
- Families who own real property suitable for occupancy are ineligible for admission to or continued occupancy in the Section 8 project-based rental assistance program;
- Owners may delay initiation of termination of assistance/eviction for no more than 6 months for families who are no longer eligible based on assets;
- When calculating income from assets, a family's imputed asset threshold has increased from \$5,000 to \$50,000 –Owners will no longer need to use the greater of actual income from assets or imputed asset income to determine total income from assets (unless asset cash value exceeds \$50,000);
- Retirement accounts and educational savings accounts will not be considered a net family asset; and
- Owners may accept self-certification of net family assets equal to or less than \$50,000 and only verify all assets every three years.

What can MFH owners due to prepare?

While it is important for owners to prepare and be well-informed, it is equally important **that none of these changes go into effective until a certification that occurs effective January 1, 2024 or after**.

In a Q&A, HUD made the following suggestion:

HUD recommends that owners review the rule carefully, take advantage of the training opportunities that HUD will offer prior to January 1, 2024, and submit questions as directed in HUD's forthcoming implementation notice and via the Multifamily HOTMA web page.



WHAT AREAS SHOULD YOU EXPECT TO BE VISITED DURING AN MOR?

Early in the pandemic, the PBCA had been conducting low-touch MORs; however, the PBCA now conducts full MORs which includes inspecting vacant units and units with EH&S and other REAC deficiencies as sited on your most recent REAC report. So, what areas of the property should you expect to be visited during your on-site MOR? Let's discuss the key areas-

At the discretion of your Reviewer:

- 1. The PBCA will visit and inspect 2 vacant units. If there are at least 2 vacant units that are ready for occupancy, your Reviewer will likely inspect 2 of those vacant units; however, if there are no units ready for occupancy, your Reviewer will inspect 2 vacant units that are in the process of being prepared for occupancy. Some things your Reviewer will consider: are the vacant units that are considered to be ready for occupancy in decent, safe, and sanitary condition? Are the vacant units being turned over in a timely manner? Please note, your Reviewer may preselect the vacant units to be visited prior to the on-site MOR, but you should have a list of vacant units readily accessible during your MOR.
- 2. Your Reviewer will have a sample of EH&S deficiencies, and other REAC deficiencies, if any, from your most recent REAC report to follow up on during the MOR. Your Reviewer may visually inspect the area of concern (including tenant units) or reach out to the tenant if your Reviewer finds their assessment of the associated work order to be insufficient. Your Reviewer's main objective is to ensure the Owner/Agent is accurately self-reporting to HUD that the deficiencies were indeed mitigated at the time the Owner/Agent certified it. For unresolved deficiencies, your Reviewer must confirm the Owner/Agent's methods and efforts to resolve the deficiency.
- 3. Your Reviewer will include a sampling of Call Center inquiries to look into during the MOR process. Your Reviewer will be looking to verify the mitigation of the concern, or verify what's being done to resolve the complaint. Please be especially prepared to address life-threatening calls as your Reviewer is likely to delve into these types of complaints. If needed, your Reviewer may need to visually inspect the area and/or work order, to confirm the issue no longer exists.
- 4. Lastly, as for areas visited during your MOR, your MOR will include a walkthrough of the property. Your Reviewer will walk the premises and inspect common areas including, but not limited to, the building exterior, hallways, laundry rooms, elevators, stairwells, the management office, and community rooms. It is encouraged that maintenance is available for the walkthrough to answer the Reviewer's questions concerning repairs, work orders, etc.

As a reminder, per the scheduling email sent by your Reviewer, you are required to advise tenants 24 hours prior to our arrival that a MOR will be in effect, and that unit inspections are included in the MOR process. If during your MOR, the Reviewer requests to visit a unit but the tenant is not present, or an unaccompanied minor answers the door, the PBCA cannot go into the unit. Additionally, if the Reviewer finds there to be a security concern at the property, the Reviewer can withdraw from inspecting units and/or common areas, and this security concern will be noted on your MOR report.

**Please note, this article only addresses areas to be visited during an MOR and therefore, does not incorporate the new inspection model, NSPIRE.

POST 10/1/2023 MOR GUIDANCE

As the baseline year of the performance-based MOR scheduling is coming to an end, HUD has updated its MOR guidance and is **now requiring that the tenant file review during a Management and Occupancy Review (MOR) include a sample of files going back to the date of the last MOR** (last exit meeting). Beginning with all MORs with a work plan effective date of 10/1/2023 and after, Owners will need to be prepared for the MOR Reviewer to request a sample of tenant files that covers the time since the previous MOR. For example, if the MOR is scheduled for October 2, 2023 and the last MOR was completed December 1, 2021, the MOR Reviewer will request to review all certifications effective from December 1, 2021 through the date of the current onsite review.



ALL RESIDENTS OF H.U.D. SUBSIDIZED PROPERTIES

North Tampa Housing Development Corporation (NTHDC) is the HUD Contract Administrator and is responsible for responding to resident concerns. NTHDC Call Center has a team of Customer Relation Specialist (CRS) that will receive, investigate and document concerns such as, but not limited to the following:

- Questions or concerns regarding work order follow-up.
- Questions regarding the calculation of your rent.
- Address health & safety and HUD Handbook 4350.3 concerns.

Call Center Purpose:

- Call Center aids in ensuring HUDs mission of providing Decent, Safe and Sanitary Housing.
- Serve as a neutral third party to residents, owners and the public.
- Assist with clarifying HUD Occupancy Handbook 4350.3 requirements.

Call Center Contact Information and Business Hours:

- Hours of Operation: Monday Friday, 8:30am to 5:30pm
- Contact Numbers: 800-982-5232 fax: 614-985-1502
- Written Summaries: 107 South High Street, 2nd Floor, Columbus, Ohio 43215
- Email: <u>PBCAContactCenter@cgifederal.com</u>
- Website: www.nthdc.org

Concerns can be submitted by the following:

- ♦ Phone
- ♦ Fax
- ♦ Mail
- ♦ Email
- ♦Voicemail
- ♦ FOIA- Freedom of Information Act request must be submitted directly to HUD

Required Information to open an inquiry:

- ♦ Property name
- ♦ Caller's name (anonymous calls accepted)
- ♦ Caller's telephone number with area code
- ♦ Caller's address including apartment number
- A brief, detailed description of the caller's concern(s)

EQUAL HOUSING OPPORTUNITY

4300 West Cypress Street, Suite 300, Tampa Florida 33607 Tele: (813) 877-1434 | Fax: (813) 877-1412 | TTY English: (800) 955-8771 | TTY Español: (877) 955-8773 | Contact Center (800) 982-5232