



Spring 2025 Edition

The CA Quarterly Review

NORTH TAMPA HOUSING DEVELOPMENT CORPORATION

FROM THE DESK OF

LAYLA HAYAVI

NTHDC Director and Contract Administrator

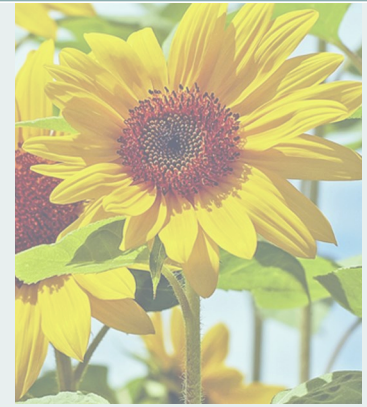
Dear Owners, Agents, and Industry Colleagues,

As we continue to navigate the evolving landscape of affordable housing, this quarterly newsletter is designed to keep owners and management agents informed and empowered.

In this edition, we'll cover key updates like HOTMA, UAF and OCAF Factors and other hot topics affecting our industry. We aim to provide you with the tools and knowledge to enhance your operations and commitment to keep you informed of the changing HUD regulatory landscape. Thank you for being a vital part of this community!

Layla Hayavi

NTHDC Director and Contract Administrator



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"If you change the way you look at things, the things you look at change." -Wayne Dyer

16TH ANNUAL GOLF TOURNAMENT FUNDRAISER

CGI Federal, as the Performance Based Contract Administrator (PBCA), helped to sponsor a golf fundraiser this past fall hosted by the Tampa Housing Authority (THA) which raised money for the following THA programs:

- Youth, Parents & Families: THA offers wrap-around programs and services to empower, educate, and elevate youth while engaging parents and families.
- Oaks at Riverview Community Center (ORCC): The ORCC is managed by THA and is home to a variety of resources and events for the community. Programs offered at this location include tutoring, recreational sports, summer programs, academic enrichment, and multi-purpose workshops.
- Youth financial Management: THA provides financial literacy programs and seminars to teach youth the importance of money management. Students learn about the significance of establishing bank accounts, savings, credit scores, and investments.
- Behavioral Health Services: THA provides services to our eligible youth who possess multiple risk factors of becoming delinquent and reside in high-risk zip codes. We provide case management, group counseling, school/home visits to support families in need.
- Intergenerational Programs: THA has developed intergenerational programs to engage our youth and senior relationships.



From left to right: Wilson Rosario, Angela Tabakian, Layla Hayavi, Elvin Maldonado



From left to right: Elvin Maldonado, Jerome Ryans, Angela Tabakian, Stephanie Gilmore Brown, Wilson Rosario

*To submit an idea or suggestions for future publications or to register for the mailing list,
Please visit the [NTHDC website](https://www.nthdc.org) or send an email to andrew.hill@cgifederal.com*

SPRINGTIME REMINDERS

Change Batteries

Be proactive this spring and be sure to change the batteries in all smoke detectors and carbon monoxide detectors/alarms to ensure exigent health and safety compliance.

Enjoy the Outdoors

Ensure sidewalks, parking lots, and all outdoor spaces are clean and free of hazards and are ready to be utilized and enjoyed by residents.

Safety First

Spring is a great time to check and service all dryers to ensure vents are clear of lint and change filters for heating/air systems.

General Maintenance

Spring is also a great time for preventative maintenance:

- Check the roof for leaks or broken shingles
- Eradicate excess moisture with dehumidifiers if necessary
- Clean out the gutters and foundation vents
- Replace damaged screens, windows and doors
- Clean and repair drainage systems
- Ensure all doors lock properly
- Check to be sure the fire system and fire extinguishers are in good working order
- Check that security systems/cameras etc. are in good working order
- Review indoor appliances and electrical systems

Taking care of your property as the seasons change will help to prevent structural damage, save energy and money, and keep the property's systems running smoothly. Cleaning, maintenance, servicing, and landscaping ensures that your property remains in good shape and is protected for the coming years.



FAQ: HUD-ASSISTED HOUSING AND MEDICARE ADVANTAGE SUPPLEMENTAL BENEFITS

HUD has released FAQs based on numerous inquiries from owners and managers of HUD-assisted properties, families receiving HUD rental assistance, and other stakeholders about the interactions between certain benefits provided under Medicare Part C, commonly known as “Medicare Advantage (MA),” and HUD rental assistance programs.

The inquiries revolved around the use of certain benefits that are part of a MA Plan and may not be obviously medical and/or health expenses and how they affect the income calculations used to determine a family member’s or individual’s eligibility and rent subsidy amounts. The FAQs specifically addresses enrollees’ use of certain benefits offered by MA plans and clarifies when the use of supplemental benefits will be included in the determination of income pursuant to federal regulations for determining eligibility and rent -subsidy provided to the tenant.

Click [here](#) to view the FAQs publication.

1.What are Medicare Advantage (MA) plans? And what are the supplemental benefits covered by these plans?

Medicare Advantage (MA) health plans cover [Medicare Part A \(Hospital Insurance\)](#), [Medicare Part B \(Medical Insurance\)](#), [Medicare Part D \(Drug Coverage\)](#), and may include supplemental benefits. These plans are generally offered by private companies that contract with Medicare and are regulated by the [Centers for Medicare & Medicaid Services \(CMS\)](#). There are several types of MA plans and a complete list can be found [here](#).

MA supplemental benefits must either be “[primarily health related](#),” or qualify as special supplemental benefits for the chronically ill (SSBCI). The eligibility criteria for SSBCI may vary by plan but in every case the benefits must have a reasonable expectation of improving or maintaining the health or overall function of the chronically ill enrollee. A non-exhaustive list of examples of non-primarily health related special supplemental benefits for the chronically ill can be found in the [April 24, 2019 Health Plan Management System \(HPMS\) Memorandum](#).

2.What MA supplemental benefits are included in income determinations under HUD’s requirements at 24 CFR § 5.609?

When enrollees use supplemental benefits from their MA Plans to pay for rent and utilities, that support cannot be excluded from income determinations performed by a housing provider or PHA. HUD requires that benefits or supports received **and used** for the purpose of paying rent and utilities – such as the supports that may be provided through an MA Plan with SSBCI – must be included in the calculation of income.

DIRECT ELECTRONIC SUBMISSIONS AS FOLLOWS:

VOUCHERS

voucher@cgifederal.com

SPECIAL CLAIMS

specialclaim@cgifederal.com

MOR RESPONSES

tampageneralmailbox@cgifederal.com



FAQ: HUD-ASSISTED HOUSING AND MEDICARE ADVANTAGE SUPPLEMENTAL BENEFITS CONTINUED

3. What MA supplemental benefits are excluded from income determinations under HUD's requirements at 24 CFR § 5.609?

PHAs and Owners and Managers of HUD-assisted properties should treat all other expenditures (except for rent and utility support) that qualify as supplemental benefits under an MA plan as excludable from annual income under 24 CFR § 5.609(b)(6).

4. What happens if the assisted family is a Medicare Advantage enrollee receiving a pre-loaded debit card (also known as a "Flex Card") with, for example, \$100 every month to administer benefits that include rent and utility support, but the preloaded amount is in the form of a use it or lose it benefit that does not roll over month to month or at the end of the plan year to create some larger resource for the assisted family?

As explained above, supplemental benefits received **and used** for rent and utilities by an eligible MA enrollee cannot be excluded from income. Accordingly, if an assisted family receives and uses rent and utility support as a supplemental benefit through, for example, a Flex Card, the dollar amount the family spends on such rent and utilities must be included as income.

Any benefits administered through a Flex Card other than rent and utility support payments, or unused benefits (e.g., any portion of the Flex Card amount that is unspent and the family loses at the end of the month or plan year) should not be counted in the family's income calculation. For example, if the family receives a \$100 Flex Card monthly and uses \$50 on other excludable health and medical care expenses but none towards rent and utilities, then the entire \$100 is excluded from the family's income calculation.

5. How should a housing provider verify MA supplemental benefits that are included in a family's income?

The vast majority of MA supplemental benefits will be excluded from income determinations, and thus do not need to be verified, including benefits on Flex Cards that are used for anything other than rent and utilities. If a family reports that they receive MA benefits to help pay for rent and utilities, PHAs and HUD-assisted owners must attempt to collect third-party documentation of the expenses and may accept the self-certification of the HUD-assisted family member when third-party documentation is not available.

As noted above, MA benefits administered through Flex Cards should be excluded from income without additional documentation unless available information indicates that the beneficiary is using the benefit for rent and utilities.

Housing providers should be aware that Medicare beneficiaries often receive benefits administered through Flex Cards in normal commercial transactions, such as using the card when checking out at the grocery store, purchasing a specialized food item recommended by their physician, or paying for over-the-counter medication. Beneficiaries should not be expected to keep a record of all purchases made and may not have straightforward access to such records from vendors that administer benefits through a Flex Card. Because only supplemental benefits for rent and utilities are relevant for income determinations, housing providers should generally assume that benefits administered through Flex Cards have not been used to pay for rent and utilities unless the housing provider has information to suggest otherwise, or the beneficiary has indicated that they receive and have used (or will use) the supplemental benefit for rent and utilities.

6. What if I have additional questions and concerns?

Should you have any additional questions or concerns, please contact your [local HUD Field Office](#).

THE SOCIAL SECURITY ADMINISTRATION ANNOUNCES THE 2025 COST-OF-LIVING-ADJUSTMENT

The Social Security Administration (SSA) has released its 2025 update that highlights all of the changes to the Social Security program for the upcoming year. Included in this update was the Cost-of-Living-Adjustment, or COLA, which was announced as 2.5% for 2025.

The COLA is an annual increase in social security and supplemental security income to account for the inflation faced by beneficiaries in 2024. This adjustment will begin with benefits payable to Social Security and Supplemental Security Income (SSI) beneficiaries in January 2025.

Where Can I Find the Announcement?

The SSA issued a press release announcing the COLA increase for the upcoming year on the SSA's [Cost-of-Living Adjustment \(COLA\) Information](#) webpage.

How Does the COLA Effect How I Process Recertifications?

SSA updates to data in the EIV system are only made periodically. Social security benefits that include the COLA are not available from SSA for uploading into EIV until the end of the calendar year.

Therefore, when processing recertifications that include social security benefits with an effective date of January 1, February 1, March 1 and April 1, owners must define the manner in which the COLA will be factored into the calculation of the SSA benefit, and the method of verification that will be used to support the calculation. In order to complete the recertification steps outlined in Chapter 7 of the HUD Handbook and provide the tenant with the required 30-day notice of any increase in rent, owners must use one of the methods below for determining the tenant's income:

1. Use the benefit information reported in EIV that does not include the COLA as third-party verification as long as the tenant confirms that the income data in EIV is what he/she is receiving;
2. Use the SSA benefit, award letter or Proof of Income Letter provided by the tenant that includes the COLA adjustment if the date of the letter is within 120 days from the date of receipt by the owner;
3. Determine the tenant's income by applying the COLA increase percentage to the current verified benefit amount and document the tenant file with how the tenant's income was determined; or
4. Request third party verification directly from SSA* when the income in EIV does not agree with the income the tenant reports he/she is receiving.

All recertifications effective after April 1 must reflect the SSA benefit that includes the COLA.

THE SOCIAL SECURITY ADMINISTRATION ANNOUNCES THE 2025 COST-OF-LIVING-ADJUSTMENT CONTINUED

***Requesting Third Party Verification Directly from the SSA**

When requesting verification from the SSA, owners must not send the tenant to the SSA office. Instead, the owner must ask the tenant to request benefit information from SSA using SSA's website or toll-free number.

The owner may assist the tenant in requesting benefit information from SSA, if the tenant requests their assistance in accessing the SSA website or has questions on completing the request.

To obtain benefit information using the SSA's website:



- Go to the [SSA's website](#)
- Log in to [my Social Security](#) to obtain a benefit verification letter.
- A tenant who has not set up an account can easily create one.

To obtain benefit information using the SSA's toll free number:



- Call the SSA at 1-800-772-1213
- Benefit verification letters may be requested 24 hours a day using the automated telephone service.
- TTY 1-800-325-0778 is available Monday through Friday between 7 a.m. and 7 p.m. for individuals who are deaf or hard of hearing.
- This information is free and the tenant should receive the letter in the mail within 10 days.

The tenant will provide the benefit verification letter to the owner for use in calculating their income. A copy of the letter will be retained in the tenant's file and the original returned to the tenant for their records.

Changes to Medicare Premiums

For Social Security beneficiaries receiving Medicare, Social Security will not be able to compute their new benefit amount until after the Medicare premium amounts for 2022 are announced. Final 2022 benefit amounts will be communicated to beneficiaries in December through the mailed COLA notice and [my Social Security's](#) Message Center. Information about Medicare changes for 2022, when announced, will be available at www.medicare.gov. Owners must also consider changes to Medicare premiums paid by elderly/disabled families when calculating medical expense deductions.

The information contained in this article is found in the HUD Handbook 4350.3 REV-1, Change 4, Chapter 9, Paragraphs 9-6 B.1.e. and 9-15.

IMPORTANT REMINDER: HAVING PBCA CONTACT CENTER FLYER POSTED FOR RESIDENTS

Dear Owners and Management Agents,

As Spring brings rain showers, it can also bring questions and concerns regarding a variety of topics including: rent calculation, maintenance, HUD Handbook 4350.3, and vouchering. As the Contract Administrator for your Section 8 Multifamily Housing properties, the PBCA Contact Center is ready to assist. Our team of Customer Relation Specialists serve as a neutral third-party to residents, owners, and the public to assist in ensuring HUD's mission of providing Decent, Safe, and Sanitary Housing.

The Contact Center needs your help to ensure that all residents are aware and have access to the contact information in order to reach out to our Customer Relation Specialists. Please make sure our Contact Center flyer is posted at your properties, so residents and applicants have access to this HUD required resource.

The Contact Center flyer is always available at the end of this Newsletter for your convenience.



WELCOME RAD PROPERTIES!

Please join us in welcoming Rental Assistance Demonstration (RAD) Owner/Agents to the Multifamily Housing Section 8 HAP community. We, the PBCA, are excited to work alongside you as we carry out our collective objective to preserve and provide decent, safe, and sanitary housing to the communities we serve.

As you become acclimated to this Section 8 HAP program, here are some helpful resources to assist you-

1. On this [webpage](#), under the Knowledge Center, there are direct links to pertinent processing documents, HUD Handbooks, Forms and Notices. This webpage is particularly used often amongst Owner/Agents as it holds required documents/forms, sample notices, and links commonly used in executing Rent Adjustments, Utility Allowance (UA) Analysis, Vouchers, and Management Occupancy Reviews (MOR). You will also find Special Claims resources, too! We highly suggest you bookmark this webpage and return to it frequently. We also update our webpage often with HUD news and announcements.

At some point, your Central Contract Specialist (CCS) or Local Contract Specialist (LCS) will likely refer you to the Knowledge Center if you have questions regarding the various tasks listed above. While you are on this webpage, please go ahead and sign up for the CA Quarterly Review to receive notifications via email when a new Quarterly Review is published.

2. [HUD's Client Information Policy Systems](#) (HUDCLIPS) is another online resource for HUD Forms, Handbooks, Policies, and other related information. If you ever find yourself searching for a HUD form, you'll likely find it here. The forms resource page allows you to search for HUD forms by form numbers. Also, links to HUD policies and regulations disseminated through Handbooks, Guidebooks, Notices, Letters, Acts and Bulletins are located on HUDCLIPS. HUDCLIPS is your one-stop-shop to HUD's publications, forms, and more!
3. Here's another webpage you may be familiar with- [RAD Multifamily Housing](#). On this webpage you'll find RAD conversion resources such as an RAD conversion overview recording, presentation slides and Q&A (under *RAD for Section 202 PRAC*), and guidance specific to your PBRA HAP Contract (under *RAD for Mod Rehabilitation*). Although you have already converted programs and are now working with the PBCA (we've got you covered!), you can always refer to the original resources you used during the conversion for a refresher on what's required under this Section 8 program.
4. Don't forget the [RAD Policy Quick Reference Guide to Multifamily Housing \(PBRA\) Requirements](#). This is the Policy Quick Reference Guide HUD published which summarizes key program requirements and should be used as a starting point for Owners to become familiar with HUD Multifamily Housing.

Just one last thing while we have you...on the HUD-9887 *Notice and Consent for the Release of Information* form, please enter the following PBCA name and address in the PHA location instead of the PHI name and address you previously used:

**North Tampa Housing Development Corp.
ATTN: Jerome Ryans
4300 West Cypress Street, Suite 300
Tampa, Florida 33607**

The PBCA appreciates the effort RAD Owner/Agents has put into their conversion. Please continue to work closely with your CCS and LCS. We are more than happy to help and looking forward to working with each of you!

HUD PUBLISHES FINAL RULE FOR 30-DAY NOTIFICATION REQUIREMENT PRIOR TO TERMINATION OF LEASE FOR NONPAYMENT

This Final Rule mandates that owners must provide written notification to tenants facing eviction for nonpayment of rent 30 days prior to filing a formal judicial eviction procedure.

This Final Rule largely adopts the proposed rule with revisions based on public comments. With this Final Rule, HUD seeks to remove the variable patchwork of notice requirements and reduce the number of preventable evictions filed against HUD-assisted tenants. The Final Notice highlights three specific aspects:

First, the final rule clarifies that Owners must not provide tenants with a termination notice before the day after the rent is due according to the lease, and the owner must not proceed with filing an eviction if the tenant pays the alleged amount of rent owed within the 30-day notification period.

Second, the Final Rule clarifies that the notification must be provided before a formal judicial eviction can be filed.

Lastly, the Final Rule requires the 30-day notice to include an itemized amount, which is separated by month, of alleged rent owed by the tenant, along with any other unpaid charges (referred to as arrearages in Notice) allowed by HUD and included in the lease which must also be separated by month, and the date by which the tenant must pay the amount of rent owed before a formal judicial eviction can be filed for nonpayment of rent. The unpaid charges, which might include late fees or other fees, must also be itemized separately from the alleged rent amount owed by the tenant. If the tenant pays the full amount of the alleged rent owed but not the unpaid charges, the nonpayment will still be considered cured, and an eviction for nonpayment of rent cannot be filed.

HUD emphasizes that the protections in this rule do not apply to other types of evictions that result from non-rent lease violations, such as nonpayment of arrearages if allowed under the applicable HUD program and specified in the lease.

[Click here](#) to review the Final Rule posted in the Federal Register December 13, 2025.

Owner compliance with this rule is required no later than January 13, 2025. PBRA owner compliance with certain requirements in new 24 CFR 880.606 (b), 884.215, 886.127(c), 886.327(c), and 891.425(d), is required no later than 14 months from the date that HUD publishes final model leases that incorporate these requirements.



HUD PUBLISHES THE FY2025 OCAF FACTORS

The Operating Cost Adjustment Factors (OCAFs) for fiscal year (FY) 2025 were published on December 11, 2024, in the [Federal Register](#).

OCAFs are annual factors that are part of an allowable method of adjusting the rents under the Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRA), as amended, for projects assisted with Section 8 Housing Assistance Payments. MAHRA gives HUD broad discretion in setting OCAFs. The sole limitation to this grant of authority is a specific requirement in each of the foregoing provisions that application of the OCAF “shall not result in the negative adjustment.” The OCAF factors are effective February 11, 2025.

The 2025 OCAF for FL is: 5.7

At the time of publishing this article, HUD has not yet updated the FY25 UAF (Utility Allowance Factor). Click [here](#) to continue to monitor for the updated UAF.

HUD PUBLISHES THE FY2025 UAF FACTORS

HUD published the FY2025 Utility Allowance Factors (UAF) which became effective February 11, 2025.

Click [here](#) to view the UAF Factors.

As a reminder, [HUD Notice 2015-04](#) requires that whenever an adjustment to the utility allowance results in a decrease, both a 30-day Tenant Notification and Owner’s Certification of Compliance are required.

SECTION 8 HOUSING ASSISTANCE PAYMENTS PROGRAM ANNUAL ADJUSTMENT FACTORS, FISCAL YEAR 2025

HUD announces FY 2025 AAFs for adjustment of contract rents on the anniversary of those assistance contracts. The FY 2025 AAFs are effective December 3, 2024.

The AAFs are applied at the anniversary of Housing Assistance Payment (HAP) contracts for which rents are to be adjusted using the AAF for those calendar months commencing after the effective date of this notice. AAFs are distinct from, and do not apply to the same properties as, Operating Cost Adjustment Factors (OCAFs).

The amount that an owner is required to deposit to the Reserve for Replacement account is also adjusted annually by the most recently published AAF, at the HAP contract anniversary. The amount of the deposit to the Reserve for Replacement account must be increased annually using the most recently published “AAF with Highest Utility Excluded” for the Metropolitan/Region in which the project is located as described in Section IV below. This adjustment must be made without regard to vacancies.

To make certain that they are using the correct AAFs, users should refer to the Area Definitions Table section at <https://www.huduser.gov/portal/datasets/aaf.html>. Furthermore, users can also search for AAF area definitions using an online lookup tool available on HUD User at the link in the previous sentence. There are two numeric columns in each AAF table. The first column is used to adjust contract rent for rental units where the highest cost utility is included in the contract rent, *i.e.*, where the owner pays for the highest cost utility. The second column is used where the highest cost utility is excluded in the contract rent, *i.e.*, where the tenant pays for the highest cost utility.

Click [here](#) to review the announcement in the Federal Register.

GET READY FOR SPRING CLEANING—RECORDS RETENTION REQUIREMENT REMINDERS

As we enter the spring months, now is the perfect time to conduct a thorough spring cleaning of your files. In order to facilitate your ‘out with the old, in with the new’ spring attitude, here are some reminders about record retention requirements.

Applicant File Retention –

Applicant Files must be maintained from the time the application is accepted, through the wait list period and for three years after the applicant is removed from the waiting list.

HUD Handbook 4350.3 Chapter 4, 4-22

- The owner must retain current applications as long as their status on the waiting list is active.
- *Once the applicant is taken off the waiting list, the owner must retain the application, *form HUD-92006 completed by the applicant*, initial rejection notice, applicant reply, copy of the owner’s final response, and all documentation supporting the reason for removal from the list for three years.*
- *When an applicant moves in and begins to receive assistance, the application *and form HUD-92006 completed by the applicant* must be maintained in the tenant file for the duration of the tenancy and for three years after the tenant leaves the property.*

Resident File Retention –

Resident files (all documentation) must be maintained for the term of tenancy plus three years thereafter.

HUD Handbook 4350.3 Chapter 5, 5-23

- Owners must keep the following documents in the tenant’s file at the project site:
 1. All original, signed forms HUD-9887 and HUD-9887-A;
 2. A copy of signed individual consent forms;
 3. **A copy of the EIV Income Report, regardless of whether or not any income is reported for the household, along with the HUD-50059 and any other documentation obtained supporting income and rent determinations; and*
 4. *Third-party verifications received from third-party sources.**
- Owners must maintain documentation of all verification efforts throughout the term of each tenancy and for at least three years after the tenant moves out

Retention of EIV Reports –

HUD Handbook 4350.3 Chapter 9, 9-14

- Owners must retain:
 1. *The Income Report, the Summary Report(s) showing Identity Verification Status as “Verified” and the Income Discrepancy Report(s) and supporting documentation must be retained in the tenant file for the term of tenancy plus three years.*

GET READY FOR SPRING CLEANING—RECORDS RETENTION REQUIREMENT REMINDERS CONTINUED

2. Any tenant provided documentation, or other third party verification of income, received to supplement the SSA or NDNH data must be retained in the tenant file for the term of tenancy plus three years.

3. Results of the Existing Tenant Search must be retained with the application:

(a) If applicant is not admitted, the application and search results must be retained for three years.

(b) If applicant is admitted, the application and search results must be retained in the tenant file for the term of tenancy plus three years.

4. The master files for the New Hires Report, Identity Verification Reports, Multiple Subsidy Report and Deceased Tenants Report must be retained for three years.

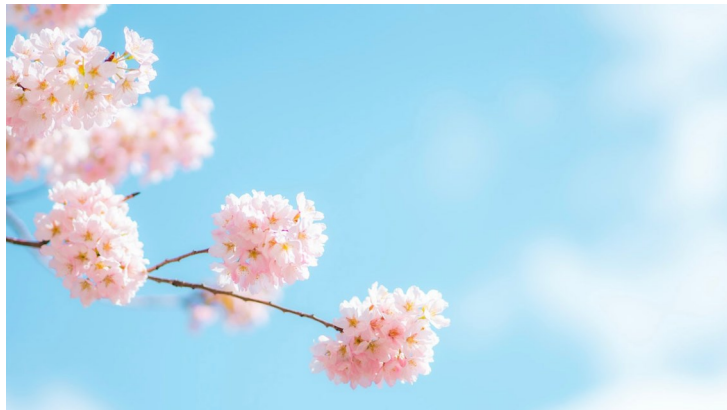
Disposing of Files –

HUD Handbook 4350.3

Once the retention period has expired, owners must dispose of the data in a manner that will prevent any unauthorized access to personal information, e.g., burn, pulverize, shred, etc.

It is recommended to review the above requirements once a year to ensure unnecessary documentation is being kept and stored on-site. Many residents may reside at a property for multiple years and this will cause the resident file to become quite large. Owners may choose to move/reduce the files located at the property; however, it is recommended to keep all move-in documentation along with the most recent five years' worth of recertifications. If file documentation is removed from the property, it must be kept in secure storage, the documentation cannot be destroyed. It is recommended to include this policy in an owner/agents written management procedures.

Happy Spring cleaning!



REVISED COMPLIANCE DATE FOR NSPIRE NEW AFFIRMATIVE REQUIREMENTS

As you are aware, NSPIRE Standards include new affirmative requirements defined generally as property attributes or requirements that must be met. When a property does not meet these requirements, it constitutes a defect and is noted within their inspection report.

HUD understands that owners, managers, and staff are still in the process of complying with these new affirmative requirements. That being the case, the compliance date for the new affirmative requirements under NSPIRE has been extended until **October 1, 2025** (see [H 2024-11](#)).

These new affirmatives, not previously subject to inspection, include the HVAC minimum interior temperature requirement of 68° Fahrenheit (anything below 64° Fahrenheit requires repair within 24 hours), smoke alarm location and type, fire sprinkler assembly, and call-for-aid systems. For detailed descriptions of each category and the associated defects to which the revised compliance date applies, refer to Section IV.D. of the [NSPIRE Scoring Notice](#).

Additionally, for a better understanding and overall picture of what will cause a property to ‘fail’ an inspection, the PBCA highly recommends property managers to utilize the following resources:

- **NSPIRE Standards webpage.** The NSPIRE Standards webpage consolidates and aligns housing quality requirements and associated inspection Standards across all programs. Each Standard is organized into two sections that present key components of an inspectable element under the NSPIRE program. The front matter at the beginning of the Standard describes attributes of the inspectable item and summarizes the defects that are citable as deficiencies. The second section provides further detail on each applicable deficiency by its inspectable location(s).
- **Inspection Checklist.** The Inspection Checklist also provides deficiency descriptions for each NSPIRE Standard. The Inspection Checklist associates the severity level (Life-Threatening, Severe, Moderate, Low) with each deficiency located in a unit, inside, or outside of the property. The severity level, which is identified as *Health & Safety Designation* on the Inspection Checklist, determines the time frame each deficiency must be corrected (24 hours, 30 days, or by the next scheduled inspection indicated by N/A). Please be aware, there is a significant increase to deficiencies required to be corrected within 24 hours as compared to previous HQS regulations.

HOTMA REMINDERS AND 2025 INFLATION-ADJUSTED VALUES

As you work diligently to become HOTMA compliant, please review these vital reminders:

HOTMA Full Compliance Date

HUD [Notice H 2024-09](#) issued on September 20, 2024 updated the HOTMA full compliance date from January 1, 2025 to **July 1, 2025**.

HOTMA Forms and Systems Changes

As we approach the full compliance date, we expect the following forms and systems to be released soon:

- HUD-50059, HUD-50059A, HUD-9887, HUD-9834, and the HUD Model Leases. Updated forms will be published to HUDCLIPS.
- TRACS 203A. TRACS specifications will be published to the [MFH TRACS webpage](#).
- MFH plans to update HUD's Occupancy Handbook (HUD Handbook 4350.3) to reflect changes required due to HOTMA.

Documentation in Tenant Files

Per [HUD's Memo](#) to the housing industry in February of 2024, Owners who implement HOTMA prior to the release of TRACS version 203A must annotate tenant files with the following information:

1. Which HOTMA and other Notices H 2023-10 provisions were implemented, regardless of whether they resulted in a different tenant rent than would have resulted using pre-HOTMA rules (owner are cautioned that many aspects of HOTMA are interrelated; implementation of some without others may be feasible and/or may affect tenant rents);
2. How the family's income, assets, and mandatory deductions were determined under the implemented HOTMA provisions; and
3. If applicable, what the tenant rent would have been under the pre-HOTMA rules, and the HOTMA tenant rent amount that was entered using the 'rent override' function.

NOTE: The TSP and EIV P&P compliance date noted in the HUD Memo was revised to 5/31/2024 as per HUD Notice [H 2024-04](#).

TRACS Rent Override Function

Implementing HOTMA prior to the release of TRACS version 203A requires Owners to use the "rent override" function in TRACS if a family's HOTMA-calculated tenant rent differs from their pre-HOTMA calculated tenant rent. An owner employing the rent override function must:

1. Submit accurate information in Sections B (Summary) and C (Household Information) of the 50059. Section C must accurately reflect the circumstances of the household so that HUD can continue income data-matching with other agencies;
2. Enter the data in the remaining sections D (Income Information), E (Asset Information), and F (Allowances & Rent Calculations) of the 50059 from the family's most recent reexamination (either annual or interim); and

HOTMA REMINDERS AND 2025 INFLATION-ADJUSTED VALUES CONTINUED

3. Submit non-interim transactions (see subtopic I.4 in Attachment I of [Notice H 2023 –10](#)) as interim reexaminations, when applicable.

Important factors to keep in mind:

- Intake forms used to receive and process owner vouchers will not be updated until the TRACS update.
- Enforcement of the asset limitation is permitted only once tenants have signed the new HUD-approved Model Lease.

2025 HUD Inflation-Adjusted Values (Table 1): Effective January 1, 2025

HUD has published the eight [Inflation-Adjusted Values](#) effective January 1, 2025. However, if an Owner is not yet complying with Section 102 and 104 of HOTMA, Owners must not utilize the new values. Annual inflationary adjustments, the new thresholds (e.g., asset limitation), and the requirement to use the passbook rate are among the provisions of Sections 102 and 104 of HOTMA.

Review of HOTMA Changes

Asset Limitation –If the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$103,200 (*[new 2025 inflation adjusted value](#)), they will not be eligible for assistance (Owners are given discretion at reexamination when enforcing the asset limitation). This MUST NOT be enforced until HUD has published the new Model lease.

Calculating Income –At Annual Reexaminations, Owners must first determine the family's income for the previous 12-month period (with attention being paid to current income) and use this amount as the family income. New Admissions and Interim Reexaminations will remain consistent with the pre-HOTMA process.

-When calculating income, Owners will not be considered out of compliance solely due to de minimis errors in calculating family income (errors no more than \$30 per month in monthly adjusted income or \$360 in annual adjusted income). While de minimis errors will not result in a finding, Owners are required to correct the error retroactively.

Deductions and Expenses –

-The elderly/disabled family deduction will increase from \$400 to \$525.

-The sum of unreimbursed health and medical care and reasonable attendant care and auxiliary expenses will change to what exceeds 10 percent of the family's annual income can be deducted from annual income.

-Some financial hardship exemptions will be available for eligible families.

Imputed Income –Imputed income from assets is no longer determined based on the greater of actual or imputed income from the assets. Instead, imputed asset income must be calculated for specific assets when three conditions are met:

- The value of net family assets exceeds \$51,600 (*[new 2025 inflation adjusted value](#));
- The specific asset is included in net family assets; and
- Actual asset income cannot be calculated for the specific asset.

HOTMA REMINDERS AND 2025 INFLATION-ADJUSTED VALUES CONTINUED

Income Exclusions – HUD is clarifying and adding some exclusions when it comes to a family's Net Family Assets. One example is the nonrecurring income exclusion which replaces the former exclusion for temporary, nonrecurring, and sporadic income (including gifts), but it provides a narrower definition of excluded income.

Inflationary Adjustments – HUD will annually publish the eight inflationary adjustments. These adjustments will be found [here](#).

Interim Reexaminations – The final rule changes the conditions under which interim reexaminations must be conducted, codifies when interim reexaminations should be processed and made effective, and requires related changes for annual reexaminations and streamlined income determinations.

-Owners must conduct an interim reexamination of family income when they become aware that a family's annual adjusted income has changed by an amount that the Owner estimates will result in a decrease of 10 percent or more in annual adjusted income or a lower threshold set by HUD or the Owner in their TSP.

-Owners must also conduct an interim reexamination of family income when the Owner becomes aware that the family's adjusted income has changed by an amount that the Owner estimates will result in an increase of 10 percent or more in annual adjusted income or another amount established through a HUD notice, with the following exceptions:

- Owners may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle; and
- Owners may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

Verification – The final rule updated verification of income requirements. All applicants must sign the consent form at admission, and participants must sign the consent form no later than their next interim or regularly scheduled income reexamination. After an applicant or participant has signed and submitted the updated consent form, they do not need to sign and submit subsequent consent forms at the next interim or regularly scheduled income examination except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a member of the family turns 18 years of age; and
- As required by HUD or the PHA in administrative instructions.

The regulation clarifies that Owners must use EIV to verify tenant employment and income information at annual and streamlined reexaminations of family composition and income. However, Owners are no longer required to use EIV to verify tenant employment and income information during an interim reexamination of family composition and income. Lastly, HUD is adjusting what the Department considers acceptable documentation of SSN to make it easier for applicants to access programs even if they do not have access to their Social Security card or other documentation acceptable to HUD.

HOTMA REMINDERS AND 2025 INFLATION-ADJUSTED VALUES CONTINUED

Available HOTMA Resources

1. HUD's [HOTMA Webpage](#)- The HUD Webpage provides a wealth of information and links to all pertinent notices and documents, including training videos and resources found [here](#).
2. Notice [H 2023-10](#)- This notice provides guidance to Multifamily Housing (MFH) Owners on the implementation of the many program changes brought about by the Housing Opportunity Modernization Act of 2016 (HOTMA) section 102 and 104 and detailed in the final rule published in Federal Register Notice 88 FR 9600 on February 14, 2023.
3. HUD's Office of Multifamily Programs has recognized that there are a lot of questions concerning the implementation of the Housing Opportunity Through Modernization Act of 2016 (HOTMA). In turn, they have developed a series of [Frequently Asked Questions](#) (FAQs) that have been received from the industry. This new resource includes clarifying guidance on the HOTMA compliant Tenant Selection Plans (TSP) reviewed during Management and Occupancy Reviews (MOR). There is additional information on the phase-in hardship relief provision, as well as the use of rent override function in TRACS 202D. It is recommended that owners and agents of Section 8 projects become familiar with the HOTMA guidance and the recent FAQs. The full FAQs can be found [here](#).



ENTERPRISE INCOME VERIFICATION (EIV) SYSTEM

What is EIV?

The Enterprise Income Verification (EIV) System provides a comprehensive on-line system for the determination and verification of various resident information and income used when determining rental subsidy. Additionally, EIV collects supplemental employment and benefit information through data sharing agreements with the Social Security Administration (SSA) and the Department of Health and Human Services (HHS). These agreements, in combination with HUD's Secure Systems, provide an analysis of income and benefit information that helps to identify and resolve certain regulatory deficiencies and to implement proactive measures to effectively mitigate risk and program waste, fraud and abuse.

The use of the EIV system by O/As has been mandatory since HUD published the *"Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification System--Amendments; Final Rule"* in December of 2009, and must be used in its entirety:

- As a third-party source to verify tenant employment and income information during mandatory recertifications of family composition and income, in accordance with §5.236, and administrative guidance issued by HUD; and
- To reduce administrative and subsidy payment errors in accordance with HUD administrative guidance. (24 CFR §5.233)

EIV Application and Online Access for Multifamily Housing Programs

Initial Access

In order to gain access to the Enterprise Income Verification (EIV) System, you must apply for such access.

- If you would like to apply for EIV Coordinator access authorization rights, you must complete the [Coordinator Access Authorization Form \(CAAF\)](#) and submit the a hardcopy of the form to: HUD's Multifamily Helpdesk by fax at 202-401-7984 or by email at Mf_eiv@hud.gov.
- If you would like to apply for EIV User access authorization rights, you must complete the [User Access Authorization Form \(UAAF\)](#) and submit it to your EIV Coordinator who will approve your form and grant your EIV access rights.
 - o To apply for access to the EIV System, applicants must have 'active' WASS User IDs (M-ID) that were issued to them by HUD, based on Owner authorization.
 - o EIV Coordinators must also have been assigned the WASS Coordinator role.
 - o To access HUD Secure Systems or register for a WASS User ID click [here](#).

Individuals wanting to become EIV Coordinators and Users should read the instructions for applying for EIV access:

- [External \(Non-HUD Coordinator/User\) Instructions for Applying for EIV Access for Multifamily Housing Programs](#)
- [System User Manual For Multifamily Housing Program Users 9.8](#)
- [External User Administration Manual For Multifamily Housing Programs 9.9](#)
- [Multifamily Housing Programs Security Administration Manual 9.9\(a\)](#)

Recertification of EIV System Access

A Coordinator(s), contract(s) and/or property(ies) must be recertified annually for continued access to EIV. The Coordinator is required to log into EIV system and utilize the Coordinator

ENTERPRISE INCOME VERIFICATION (EIV) SYSTEM CONTINUED

Access Request menu to request recertification or application of a new contract or property by submitting an online CAAF to HUD's Multifamily Help Desk for approval. The ability for Users to complete and submit their UAAs online also exists, which is submitted in EIV system online to the Coordinator for approval.

- Coordinators are required to recertify annually, with a 30-day grace period, or will lose full EIV access.
- Users must request and Coordinators must re-certify their EIV Users through the User Certification feature in the EIV system no later than the 30-day grace period Semi annually.

Maintaining EIV Access Documentation

Upon obtaining EIV access, the following documents must be retained and made available:

- Written authorization from the owner to access EIV data for the property
- List of EIV Coordinator(s) and EIV User(s) who currently have access to the EIV system
- HUD approved EIV Coordinator Access Authorization Form(s) (CAAFs) for each EIV Coordinator assigned to the property (original and current)
- EIV Coordinator approved EIV User Access Authorization Form(s) (UAAs) for each employee assigned access to EIV data for the property (original and current)
- Signed Rules of Behavior document for each person who does not have access to the EIV system, but will be reviewing EIV data for authorized purposes
- "Certificate of Completion" of the online Cyber Awareness Challenge training o Annual Cyber Awareness Challenge Training

Secure Systems users and coordinators who access HUD's Enterprise Income Verification System (EIV) or the Tenant Rental Assistance Certification System (TRACS) are required to complete the Cyber Awareness Challenge **each year**. Staff with access to EIV reports, because they have access to tenant files, are required to complete this training as well. To complete online security training please follow the steps below:

- Follow the link: [Cyber Awareness Challenge – DoD Cyber Exchange](#)
- Click the '**All Other Users**' Icon
- Click on '**Start New Session**' to proceed with the training
- Print and maintain the *Certificate of Completion*

Management and Occupancy Review (MOR) Compliance

The MOR includes a thorough evaluation of how owner/agents are running and using EIV reports, whether or not they are documenting the actions they have undertaken to investigate discrepancies, and how they are storing the reports. The MOR will include a review of the property's EIV Policies and Procedures, its Master EIV Binder/Files with all required EIV Reports retained for three years, and the required EIV Reports to be maintained within the respective tenant file.

To stay compliant with [HUD Handbook 4350.3 Chapter 9](#), owner/agents must use EIV in its entirety, this means running the reports in accordance with Chapter 9 and their own Policies and Procedures. The handbook includes [Exhibit 9-5](#) which is a valuable resource on EIV report usage, file documentation, and retention requirements.



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: PBACContactCenter@cgifederal.com
- ◆ 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

Contact Center (800) 982-5232

Fax: (614) 985-1502 | TTY English: (800) 955-8771 | TTY Español: (877) 955-8773 |