



Winter 2023 Edition

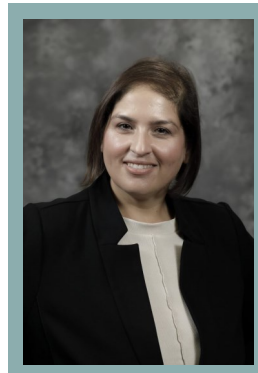
The CA Quarterly Review

NORTH TAMPA HOUSING DEVELOPMENT CORPORATION

FROM THE DESK OF

LAYLA HAYAVI

NTHDC Director and Contract Administrator



Dear Owners, Agents, and Industry Colleagues,

As we wind down 2023, we are reflecting on all the hard work and success we have had this year and look forward to another great year of industry and HUD partnership.

In 2023, NTHDC completed another successful year as your PBCA. This year we:

- Serviced over 440 resident calls
- Processed and paid over 5,300 monthly vouchers
- Completed over 400 Rent Adjustments
- Conducted nearly 300 Management and Occupancy Reviews
- Executed over 50 HAP Contracts
- Processed and paid 45 Coronavirus Supplemental Payments

Best wishes to you all and may 2024 bring us joy, friendship and success. May you all enjoy the holidays and have a Happy New Year!

Layla Hayavi

NTHDC Director and Contract Administrator



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“Approach the New Year with resolve to find the opportunities hidden in each new day.”

~Michael Josephson

WINTER QUICK TIPS

As we enter another winter season, the days become both cooler and shorter. Here are a few quick tips for the winter season and colder weather.

- Provide instructions regarding the proper disposal of Holiday decorations (including Christmas Trees/Wreaths) to your tenant population.
- Remind tenants of any House Rules with respect to ornaments or decorations around their door or hallways, and to check lighting for frayed wiring (which may create a fire hazard).
- Remind residents to check/test the batteries on their smoke alarms.
- Decide if your property allows space heaters and if tenants need management approval for them.
 - ◊ If space heaters are allowed, communicate to your tenants the acceptable space heaters to use;
 - ◊ Along with this, provide some fire prevention tips when using space heaters. For example place space heaters in an open location on sturdy ground, away from walls and furniture. Ensure that space heaters are never left on when you leave your apartment.
- Make sure your residents are aware of who to call for ‘no heat’ emergencies. Be sure that number is posted and easy to find after hours.

*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 andrew.hill@cgifederal.com*

NEW ENERGY AND WATER BENCHMARKING SERVICE

HUD announced December 6th a new service available for properties participating in its Multifamily project-based rental assistance programs – Energy and Water benchmarking Service. This new service is free and provides participating multifamily property owners with data on energy and water consumption at their properties. This data provided through the Energy and Benchmarking Service will aid property owners in identifying opportunities for energy efficiency improvements that can benefit residents and promote green investments in individual properties or entire property portfolios. The data can also be used to assess rehabilitation efforts that may be eligible for grant or loan funding under HUD’s Green and Resilient Retrofit Program (RRP) or other sources of funding.

Funded with \$42.5 million through the Biden-Harris Administration’s Inflation Reduction Act, the benchmarking service announced today is free for owners of properties participating in HUD’s Multifamily Assisted Housing programs, including Section 8 project-based rental assistance, Section 202 Housing for Low-Income Elderly, Section 811 Housing for Low-Income Persons with Disabilities, and Section 236 Preservation programs.

Why you should participate in the Energy and Water Benchmarking Initiative? Well, the HUD Energy and Water Benchmarking Initiative can provide a variety of benefits to multifamily property owners, including:

- Receiving an annual property analysis report with usage trends and identifying opportunities for energy and water savings in your building(s)
- Establishing eligibility or preparing you to make use of federal, state, and utility energy efficiency programs, such as HUD’s Multifamily Green and Resilient Retrofit Program and EPA’s Greenhouse Gas Reduction Fund.
- Supporting early compliance with local ordinances as more localities across the country take interest in energy usage data of multifamily properties.

Owners can opt-in to the program or ask questions by emailing MFBenchmarking@HUD.gov. Review the full Press Release [here](#).

HUD NOTICE: REQUIRED USE OF PORTFOLIO MANAGER FOR GREEN MORTGAGE INSURANCE PREMIUM COMPLIANCE REPORTING

On November 20, 2023, HUD’s Office of Multifamily Housing Programs and Office of Residential Care Facilities published a Housing Notice titled Required Use of Portfolio Manager for Green Mortgage Insurance Premium Compliance Reporting, which pertains to changes to annual compliance reporting for Green Mortgage Premium (MIP) rate recipients. The Notice replaces previous instructions provided to Multifamily and Section 232 properties.

As previously required, the Statement of Energy Performance (SEP) must be submitted by March 31 of the subsequent year after the 12-month data collection period of January 1 to December 31. Instead of exporting and emailing compliance data to HUD, however, property owners are now required to use Portfolio Manager’s data sharing function to share compliance data with HUD. This one-time action will replace annual exports by property owners, ensuring easier and more reliable reporting. This process applies to SEPs due March 31, 2024, as well as all subsequent submissions until otherwise amended. Detailed instructions on how to connect with the HUD accounts are available [here](#) under “How to Register and Benchmark Multifamily Properties in Portfolio Manager.”

Read the full Notice [here](#).

HUD PUBLISHES FAQ TO GUIDE OWNERS AND OPERATORS WHO SEEK TO MAKE NALOXONE (NARCAN) AVAILABLE IN THEIR COMMUNITIES

To help support the Public Health Officials’ efforts across the country to improve public safety, HUD published an FAQ on October 31, 2023 to guide Owners/Management Agents who seek to make Naloxone (Narcan) available in their communities. HUD recognizes the importance of national and local efforts to prevent overdose tragedies that impact too many of us, our loved ones, and our communities. Naloxone is a life-saving medication that can reverse an overdose from opioids, including heroin, fentanyl, and prescription opioid medications, if given in time. Like Automatic External Defibrillators (AEDs) or EpiPens, Naloxone is a valuable tool to provide an extra layer of protection for people at risk of overdose. Read HUD’s FAQ guide [here](#) for more information.

DIRECT ELECTRONIC SUBMISSIONS AS FOLLOWS:

VOUCHERS

voucher@cgifederal.com

SPECIAL CLAIMS

specialclaim@cgifederal.com

MOR RESPONSES

tampageneralmailbox@cgifederal.com

CSP CLAIMS

CSPClaims@cgifederal.com



HOTMA UPDATES: NOTICE 2023-10

The purpose of the most recent HOTMA related notice ([Notice 2023-10](#)) from HUD is to provide guidance to Multifamily Housing (MFH) Owners on the implementation of the many program changes brought about by the Housing Opportunity Through Modernization Act of 2016 (HOTMA) sections 102 and 104 and detailed in the Final Rule published in the *Federal Register* on February 14, 2023.

HUD recognizes that HOTMA includes significant program and system changes and that Owners and families need time to understand the changes and implement them. HUD understands that the system development timeframe for the Tenant Rental Assistance Certification System (TRACS) to make full implementation and compliance with the final rule by the January 1, 2024 deadline unlikely. Additionally, because these HOTMA changes apply to all current participants and new admissions, implementation of the HOTMA final rule cannot be achieved immediately on a universal basis but rather is an ongoing process that will happen over the course of a year as routine program.

Section 6.2 of the Notice is specific to our MFH Owners. This section outlines the first actions HUD is requiring of the new year. By March 31, 2024, Owners must update their Tenant Selection Plans and EIV Policies and Procedures to reflect all HOTMA changes. While these documents must be updated, Owners must continue to follow their existing Tenant Selection Plans and EIV Policies and Procedures until their software is compliant with TRACS 203A. HUD has also updated their [HOTMA webpage](#) which provides guidance for Owners when updating their Tenant Selection Plan and EIV Policies and Procedures.

Section 6.2 of the Notice continues with the HUD HOTMA requirements for Owners for only after their software is HOTMA compliant. First, Owners will begin using the updated HUD Model Lease after at least a 60-day notice to tenants that their lease will be modified at the end of their current least term. Second, Owners can begin implementing their revised Tenant Selection Plan and EIV Policies and Procedures. Lastly, once an Owner's software is HOTMA compliant, Owners must submit tenant data in compliance with HOTMA regulations and inform tenants, prior to their first reexamination under HOTMA, that their income determinations will be conducted in accordance with the HOTMA final rule.

The notice then contains a review of all the updates and changes that will come with HOTMA:

Asset Limitation – HOTMA will create a restriction on the eligibility of a family to receive assistance if the family owns real property that is suitable for occupancy by the family as a residence or has assets in excess of \$100,000. Owners are given discretion at reexamination in enforcing the asset limitation on eligibility for assistance. HUD will issue additional guidance on the use of this discretionary authority.

Calculating Income – New Admissions and Interim Reexaminations will remain consistent with the pre-HOTMA process. For Annual Reexaminations, Owners must first determine the family's income for the previous 12-month period and use this amount as the family income for annual reexaminations; however, adjustments to reflect current income must be made.

-Owners will not be considered out of compliance solely due to de minimis errors in calculating family income. De minimis errors occur when an Owner's determination of a family's income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (or \$360 in annual adjusted income). While Owners will not be issued a finding for de minimis errors in income calculation, they are obligated to correct the error(s) retroactive to the effective date of the action the error was made regardless of the dollar amount associated with the error.

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.

-Concurrently with this increase, the regulations provide financial hardship exemptions for unreimbursed health and medical care expenses, and for reasonable attendant care and auxiliary apparatus expenses for eligible families. A family will benefit from this hardship exemption only if the family has eligible expenses that can be deducted in excess of 5 percent of annual income.

.....Continued on page 5

HOTMA UPDATES: NOTICE 2023-10 (CONTINUED)

Income – Imputed returns on net family assets are included in annual income only when net family assets exceed \$50,000 (a figure that is annually adjusted for inflation) and actual asset income cannot be calculated for all assets. 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 \$50,000 (as adjusted for inflation);
- The specific asset is included in net family assets; and
- Actual asset income cannot be calculated for the specific asset.

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 inflation-adjusted items in the table below no later than September 1, and the updated values will be shared online at the HUDUser Web site. The revised amounts will be effective on January 1 of the following year. The first set of adjustments for inflation will be made effective January 1, 2025.

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. When the Owner determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income. 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:

- PHAs/MFH 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

- PHAs/MFH 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 a consent form either on or after January 1, 2024, 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. Owners must still attempt to gather third-party verification of SSN prior to admission; however, they will also have the option of accepting a self-certification and a third-party document with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA/MFH has exhausted all other attempts to obtain the required documentation.

For more information, be sure to read Notice 2023-10 in its entirety and keep up-to-date with HUD communications.

HUD PROVIDES HOTMA SUPPLEMENTAL GUIDANCE UPDATE

On November 29th, HUD sent out communication about the Supplemental Guidance that was promised in Notice 2023-10. HUD is working to release supplemental guidance related to HOTMA, specifically related to the asset limitation described in Attachment A in Notice H 2023-10. This supplemental guidance will describe the discretion owners have regarding implementation and enforcement of the provision (24 CFR §§ 5.100; 5.603; and 5.618).

It is strongly recommended that Owners wait to review this supplemental guidance before making any change to current management policies. As a reminder, full compliance with the HOTMA final rule is mandatory effective January 1, 2025.

Until new guidance is released, please be aware of the following:

MFH Owners must not enforce the asset limitation or the real property exemption until both the owner's software is HOTMA compliant (with TRACS 203A), and the family has signed a model lease detailing the new HOTMA provisions.



HUD PUBLISHES THE FY2024 OCAF AND UAF FACTORS

The Operating Cost Adjustment Factors (OCAFs) for fiscal year (FY) 2024 were published on November 30, 2024, in the [Federal Register](#).

These factors are used for adjusting cost-adjustment-factors-for-2024 or establishing Section 8 rents under the Multifamily Assisted Housing Reform and Affordability Act of 1997 (MAHRA), as amended, for projects assisted with Section 8 Housing Assistance Payments. The OCAF factors are effective February 11, 2024.

The 2024 OCAF for FL is: **5.2**

HUD also published the corresponding FY 2024 UAF factors, which will also be effective February 11, 2024, and can be found [here](#).



ELIMINATING THE ASSURANCE OF COMPLETION ON A SECTION 223(F) WITH NEW LIHTC

HUD's Office of Multifamily Housing published a Housing Notice (2023-12) announcing the elimination of the 10 percent Assurance of Completion escrow in certain Multifamily 223(f) transactions that include new Low Income Housing Tax Credit (LIHTC) proceeds. Multifamily Production has considered the current affordable rental housing market conditions utilizing LIHTC and determined that removing the 10% assurance of completion escrow from 223(f) new LIHTC transactions will further incentivize borrowers and lenders to use HUD's 223(f) financing authority to promote affordable housing, with minimal increased risk to the Department. This change only applies to 223(f) applications for projects that are utilizing the new LIHTC with payment and performance bonds or a letter of credit. This change became effective on December 4, 2023. Click [here](#) to read the entire Notice.



CA CONTACT CENTER

The role of the Contact Center is to support and service our industry stakeholders by addressing inquiries received. The PBCA understands the critical nature of addressing inquiries timely to ensure that prompt resolutions are attained. When an industry partner needs assistance, you can reach us by email, phone or fax. The Contact Center will respond promptly to all inquiries with continued follow-up until we reach an agreed delivered resolution. We achieve these aims by employing three fundamental principles.

The first principle we follow is to **facilitate resolutions**. Per HUD requirements, PBCAs are expected to respond, research, and communicate reasonable solutions. We fulfill this requirement by ensuring accurate information is documented, verified, and communicated with all interested parties. We do so to provide a full understanding of all reported concerns. Our team employs the use of various research sources such as the CFR, HUD handbooks, HUD notices, state and local laws that inform us of the requirements to maintain compliance and meet guidelines. Ultimately, in our effort to reach a final resolution, we detail the information to all stakeholders and refer them to the applicable guidelines. We then follow-up and verify the appropriate action is taken. This follow-up assists in reducing systemic issues.

“The PBCA understands the critical nature of addressing inquiries timely to ensure that prompt resolutions are attained.”



Secondly, the PBCA is an **industry resource**. As a dependable resource, it is imperative that we stay abreast of current housing policies, state and local laws, and notices. In addition, our Training and Compliance team, as well as our in-house experts make themselves available to the industry and to our Contact Center providing periodic industry updates and required training. A critical area in which we focus our efforts is the accuracy and timeliness of addressing health and safety issues. With these foundational pillars, we are able to make ourselves available to the industry in various ways including through our Contact Center, webinars, industry workshops or conferences, and through our PBCA quarterly newsletter.

Thirdly, we **foster relationships**. In the delivery of the PBCA requirements, there is tremendous value in connecting with all stakeholders. The Contact Center is in a privileged position where we connect with more industry stakeholders than any other group on a given day. Daily we connect with residents, owner/agents, HUD, PHAs, Congressional, state and local officials, and non-industry partners. Therefore, it is important for the Contact Center to calibrate all communications in light of HUD’s goal of providing decent, safe, and affordable housing. Recognizing this critical starting point allows the relationship to grow and develop, as we are focused on the same goal. This allows us to continue year over year to foster excellent relations.

Following these principles, guarantees that stakeholders are provided accurate and timely information. This information reduces the necessity of utilizing other resources in addressing questions or concerns or obtaining a resolution. We take great pride in incorporating this three-principle approach and being available as an extended affordable housing resource supporting stakeholders in delivering on HUD Housing mandates.



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: 8760 Orion Place, Suite 110, Columbus, Ohio 43240
- ◆ Email: PBCAContactCenter@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

Tele: (813) 877-1434 | Fax: (813) 877-1412 | TTY English: (800) 955-8771 | TTY Español: (877) 955-8773 |
Contact Center (800) 982-5232