




The CA Quarterly Review

North Tampa Housing Development Corporation

Winter 2019

Inside this Issue...		From the Desk of Don Shea, NTHDC Director and Contract Administrator	
From the Desk of Don Shea	1		<p>As we start a new year, I want to thank all the Owners and Agents we worked with during the previous year. The time and effort you invest into your properties and residents does not go unnoticed. Too often it seems when attention is given the negative things seem to steal the spotlight. Your efforts to further the Affordable Housing industry is impacting lives now and for years to come. We had a strong finish and are already looking at ways we can make 2020 even better.</p>
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Best Wishes,
Don Shea
NTHDC Director and Contract Administrator

REMINDER!

Be sure to update NTHDC's address on form HUD-9887.

The change of address must be listed on all 9887s going forward or a finding may be issued.

New address:

1509 West Swann Avenue
Suite 250
Tampa, FL 33606





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Data Security

Data Security refers to the protective measures of securing data from unapproved access and data corruption. It is essential to safeguard all of your data both physically and online. HUD does require that Owner/Agents protect the privacy of individual's information and has provided some suggested guidance to better assist in enhancing the data security measures at your property. The steps that will be discussed to help ensure compliance include:

- Create (and adhere to) a written policy and procedures manual.
- Review HUD policy for safeguarding Personal Identifying Information (PII)
- Attend Security trainings
- Never send a document to the PBCA with PII

Protecting Privacy Information

The Department of Housing and Urban Development (HUD) is committed to protecting the privacy of individuals' information, stored electronically or in paper form, in accordance with the Privacy Act of 1974, as amended, and other federal privacy-related laws, guidance, and best practices. HUD expects its third party business partners who collect, use, maintain, or disseminate HUD information to protect the privacy of that information. Definitions that will be used through this article include:

- Personally Identifiable Information (PII). Defined in OMB M-07-16 as "...information which can be used to distinguish or trace an individual's identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother's maiden name, etc."
- Sensitive Personally Identifiable Information (SPII). PII that when lost, compromised or disclosed could substantially harm an individual. Examples of sensitive PII include social security or driver's license numbers, medical records, and financial account numbers (credit or debit card numbers).

Create a Written Data Security Policy

Chapter Nine, Section Four of the HUD Occupancy Handbook (4350.3) provides the guidance and security requirements that properties need to implement to safeguard EIV data. However, EIV policies and procedures should be a subset of an overall strategy and policy handbook to safeguard all potential tenant/applicant PII that HUD requires to be collected and maintained.

As the opening paragraph reminds, data security is much more than protecting PII, a comprehensive policy should discuss Phishing attempts, using Social Media, and protecting all forms of sensitive information that is maintained in your place of business. We strongly recommend a comprehensive written policy that takes into consideration multiple HUD sources that we will discuss in this article.

Review HUD Policy

HUD has created and published numerous handbooks and materials that discuss the various requirements for data security. When creating a comprehensive plan, be sure, at minimum to review these resources:

- HUD Handbook [4350.3 Rev-1 Change 4: Chapter 9](#) section four contains the required information to safeguard HUD's EIV information.
- HUD Handbook [4350.3 Rev-1 Change 4: Chapter 5](#) paragraphs 5-19, 5-20, 5-23 discuss the framework to ensure privacy of applicant and tenant information

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- HUD Handbook [4350.3 Rev-1 Change 4: Chapter 8](#) paragraph 8-14 emphasizes the importance of privacy requirements when obtaining criminal background reports and , 8-20 discusses EIV income reports
- Chapter Four of the [EIV Multifamily Program User Manual](#) provides specific Security information and guidance that must be adhered to when developing Policies and Procedures.
- [The Security Administration Manual for EIV Systems](#) provides an overview and details the process for how access to the EIV system is granted. The guidance found within this document should be reviewed when determining who to grant access to EIV, how to grant the applicable access, and how to terminate that access.
- HUD Handbook [2400.25 TECHNOLOGY SECURITY POLICY](#) is the comprehensive overview of all of HUD's policies and safeguards. This handbook should be reviewed by the person developing the project's policy and procedures documents as well as the person/company responsible for maintaining the property's computer system.

The most succinct publication for protecting privacy information can be found in HUD's 2015 [Protecting PII Capacity Building Guidance](#) document distributed by HUD. For your convenience, we have summarized this document's guidance here:

Manage Access to Sensitive PII

- a. Only share or discuss sensitive PII with those who have a need to know for work purposes.
- b. Do not distribute or release sensitive PII to others until the release is authorized.
- c. Before discussing sensitive PII on the telephone, confirm that you are speaking to the right person and inform him/her that the discussion will include sensitive PII. Do not leave messages containing sensitive PII on voicemail.
- d. Avoid discussing sensitive PII if there are unauthorized persons in the adjacent cubicles, rooms, or hallways who may overhear your conversations.
- e. Hold meetings in secure spaces (no unauthorized access or eavesdropping possible) if sensitive PII will be discussed.
- f. Treat notes and minutes from such meetings as confidential unless you can verify that they do not contain sensitive PII. Record date, time, place, subject, chairperson, and attendees at any meeting involving sensitive PII.

Protect Hard Copy and Electronic Files Containing Sensitive PII

- a. Clearly label all files containing sensitive PII. Examples of appropriate labels might include – For Official Use Only, or For [Name of Individual/Office] Use only.
- b. Lock up all hard copy files containing sensitive PII in secured file cabinets. Do not leave sensitive PII in an open area unattended.
- c. Protect all media (e.g., thumb drives, CDs, etc.) that contain sensitive PII and do not leave unattended. This information should be maintained either in secured file cabinets or in computers that have been secured.
- d. Keep accurate records of where PII is stored, used and maintained.
- e. Periodically audit all sensitive PII holdings to make sure that all such information can be readily located.
- f. Secure digital copies of files containing sensitive PII. Protections include encryption, implementing enhanced authentication mechanisms such as two-factor authentication and limiting the number of people allowed access to the files.
- g. Store sensitive PII only on workstations that can be secured, such as workstations located in areas that have restricted physical access.

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Protecting Electronic Transmissions of Sensitive PII via fax, email, etc.

- a. When faxing sensitive PII, use the date stamp function, confirm the fax number, verify that the intended recipient is available, and confirm that he/she has received the fax. Ensure that none of the transmission is stored in memory on the fax machine, and that all paper waste is disposed of properly (shredded). If possible, use a fax machine that uses a secure transmission line.
- b. When sending sensitive PII via email or via an unsecured information system, make sure the information and any attachments are encrypted.
- c. If a secure line is not available, contact the recipient office prior to faxing to inform them that information is coming. Then, contact the recipient office following transmission to ensure they received it. For each event, the best course of action is to limit access of PII only to those individuals authorized to handle it, create a paper trail, and to verify information reached its destination.
- d. Do not place PII on shared drives, multi-access calendars, the Intranet, or the Internet.
- e. Do not let PII documents sit on a printer where unauthorized employees or contractors can have access to the information.

Protecting Hard Copy Files Containing Sensitive PII

- a. Do not remove records with sensitive PII from facilities where HUD information is authorized to be stored, or access remotely (i.e., from locations other than such physical facilities), unless approval is first obtained from a supervisor.
- b. Do not use interoffice or translucent envelopes to mail sensitive PII. Use sealable opaque solid envelopes. Mark the envelope to the person's attention.
- c. When using the U.S. postal service to deliver information with sensitive PII, double wrap the document (use two envelopes – one inside the other) and mark only the inside envelope as confidential with the statement – To Be Opened by Addressee Only.
- d. If PII needs to be sent by courier, mark "signature required" when sending documents, in order to create a paper trail in the event items are misplaced or lost.

Records Management, Retention and Disposition

- a. Follow all applicable records management laws, regulations, and policies.
- b. Do not maintain records longer than required.
- c. Destroy records after retention requirements are met.
- d. Dispose of sensitive PII appropriately – permanently erase electronic records. Shred hard copy records.

Attend Additional Security Trainings

HUD requires all TRACS users and EIV users (or those that view EIV reports) to sign a Rules of Behavior form and complete an annual security awareness training. Users must complete the [FY2020 Cyber Awareness Challenge](#). Users are reminded of the requirement to print and maintain the certificate as this will be requested during the onsite portion of the MOR.

In addition to the required training session, there are a few additional trainings located at the IASE web page. It is highly suggested to have staff members also complete the following training modules:

Phishing Awareness Version 4

This training was created to enable users to recognize phishing, spear phishing, and whaling attempts, determine the steps to take when targeted in a phishing attempt, and to take appropriate actions to avoid the potential losses that these social engineering scams can cause. The user is provided with examples of different types of phishing, as well as techniques used to conduct phishing, including deceptive e-mails, websites, and browser "tab nabbing". Finally, the course reviews ways to combat phishing attempts, even from people within their own organization. (Length - 30 Min)

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Identifying and Safeguarding Personally Identifiable Information (PII) Version 3

This course explains the responsibilities for safeguarding PII and PHI on both the organizational and individual levels, examines the authorized and unauthorized use and disclosure of PII and PHI, and the organizational and individual penalties for not complying with the policies governing PII and PHI maintenance and protection. This training is intended for DoD civilians, military members, and contractors using DoD information systems. This course may also be used by other Federal Agencies. (Length- 1 hr.)

Never send a document to your PBCA that contains PII that has not been redacted

Despite the information contained within our letters and reports, there are still occasions when Owners will send documents to the PBCA that contain PII. Please update your procedures to address the following concerns.

MOR responses

Never send a paper certification to respond to a finding on an MOR. All corrected certifications can be reviewed and verified within our vouchering software. The finding will be closed out once the corrected certification is transmitted and approved via the typical vouchering protocol.

Never send any form of EIV report with your response. Although the Handbook and HUD specifically focus on income reports when discussing PII, the PBCA requests that no EIV reports are ever electronically submitted to the PBCA. The PBCA, if needed, can either verify via the EIV system or via the tenant file documentation during a subsequent visit to the property.

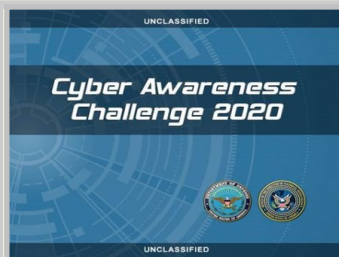
Special Claims Submissions

In our experience, the single largest breach of HUD's security policy occurs when Owner/Agents submit materials to support a special claim. Prior to sending information to the PBCA, **REDACT** all information from Section C, Section D, and Section E from the MI 50059. This information is not required for the review and approval of the special claim.

In addition to this specific item, ensure that all potential Personal Information is redacted from all documents sent to support a special claim. If in doubt, redact from the document prior to submission and error on safeguarding tenant PII. If needed, the PBCA can follow-up with a phone call to discuss a specific omission.

Take a moment to review the policies and procedures that are currently in place at your property, review the resources that have been mentioned in this article, update your documents accordingly, and disseminate/educate all of your employees of the expectations to maintain the integrity of the data security at your place of business.

Remember, in today's world it is easy to be tricked, and it only takes once. If you receive a call or a formal written request for information, make sure to get all of the pertinent information from the person inquiring. When in doubt, always ask questions. Request the person's contact information, confirm why they need the requested information or documents. If there is a concern, reach out to HUD, provide the information to the Account Executive, and enable the AE to respond.



Cyber-Awareness Challenge

The Cyber-Awareness Challenge, which is required for EIV users to satisfy annual online security training, has changed locations. The training is now titled "Cyber Awareness Challenge 2020" and is located [here](#).

EIV users must complete this training annually. The certificate of completion must be printed and retained and made available for review during an audit.



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Best Practices When Responding to an MOR

When an Owner/Agent receives the Summary Report and there are no deficiencies noted on the report, *no additional action is required*. When an Owner/Agent receives the Summary Report and deficiencies are noted, *the Owner/Agent must take action to resolve the deficiencies*. Targeted Completion Dates (TCD) will be noted for all deficiencies identified during the review and will not exceed 30 calendar days. Owner/Agents must provide documentation to support that the deficiencies have been corrected by the TCD noted on the Summary Report.

The Owner/Agent response needs to include all items that had been requested in the corrective action portion for each finding identified in the report. Some corrective actions may only require an explanation and certification, while others may require supporting documentation. It is important to read each corrective action carefully to ensure the proper documentation is submitted with the owner/agent response. Each finding needs to be addressed and an explanation provided along with the progress on each finding that has not been completed. As required, follow-up will occur every 30 days until each discrepancy, as noted on the report, has been resolved. A proper response should have three basic components including the cover letter, supporting documentation, and a written certification for each finding.

Cover Letter

The cover letter should provide a response overview and detail the items that are being submitted. If appealing a 'Below Average' or 'Unsatisfactory' overall MOR score, be sure to clearly state at the beginning of the cover letter that the MOR is being appealed and specifically identify what is being appealed. Appealing an MOR does not usurp the requirements to respond to the items listed on the MOR with the target completion date as identified on the MOR report. The cover letter should designate the staff member assigned to close out the MOR and provide his or her contact information. The owner and/or the owner's designee must sign the cover letter.

Supporting Documentation

Include all items requested for each corrective action and clearly label each supporting document(s) with the finding item number for which they coincide. If appealing, be sure to include supporting documents to support the appeal and clearly label the documents accordingly. Basic supporting documentation requested in a corrective action typically includes:

1) Policy and Procedures

Policy and procedures are written instructions to be followed by site staff for a particular item. A corrective action will tend to require either the creation of new procedures or the revision of existing procedures. When responding, be sure to include the updated procedure in the response.

2) Documents

Each corrective action will specifically describe the documents that were missing or erroneously completed at the time of the on-site review. Responding to these corrective actions typically require the following tasks:

- Locate missing document
- Revise an existing document
- Create a document
- Execute a document

3) Specific Documentation

Specific Documentation that is required to demonstrate a finding has been cured will be explicitly described in each corrective action as to what to provide. Examples include:

- Completed work order or completed vendor invoice.
- Voucher adjustments:
- Clearly identify what the adjustment is for on the voucher.
- Reviewer will determine if it is the correct amount and will verify with the Voucher Specialist that the adjustment has been correctly processed.
- Documentation of a tenant refund
- Copy of check to tenant for total amount of refund
- If tenant requested the refund in the form of a rent credit, a copy of the tenant ledger showing the total rent credit.

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Best Practices When Responding to an MOR (continued)

Due to Privacy Act Issues

- **Do not send copies of corrected 50059s** to the PBCA as part of a close out. All adjustments to the voucher can be viewed, submitted and reviewed via vouchering software tools.
- **Do not submit any copies of EIV reports** as a response to an MOR Finding.
- **Redact any personal identifiers** that may be included on any of the supporting documentation.

Corrective Action Plans

Occasionally, a corrective action will require additional time to correct the deficiencies noted in the report. In these situations the PBCA will request a corrective action plan to resolve the noted deficiency. These findings can include a 100% file review to resolve a recurring issue identified in the file review, multiple maintenance issues and/or high cost maintenance issues that need to be addressed or for security issues. When submitting a corrective plan the Owner/agent will be requested to:

- Include each item to be addressed or task to be performed.
- Identify staff that will be responsible for follow up and staff that will assist in resolving each issue.
- Include estimated start and completion times for each item included in the plan.

Appealing an MOR

If an owner/agent receives an overall score of 'Below Average' or 'Unsatisfactory' as indicated on HUD form 9834 Summary Report, the owner/agent may appeal the rating using the following process:

Initial Appeal to the Contract Administrator

- The Initial appeal must be in writing, forwarded to the PBCA, and postmarked within 30 calendar days from the date of the report.
- The appeal letter must explain the factual basis supporting a change in the rating, with sufficient specific examples provided to warrant further evaluation.
- The PBCA is responsible for evaluating the additional information, including another on-site visit for only those items in dispute, if necessary and if resources are available.
- The initial appeal decision must be in writing and transmitted to the owner/agent by the CA within a 45 calendar day period following receipt of the appeal.

Final Appeal to HUD

- If the owner/agent does not agree with the CA appeal decision, they must submit a final appeal to the Multifamily Hub Director.
- The final appeal must be in writing and postmarked within 15 calendar days of the transmittal date of the initial appeal decision letter from the CA.
- The Multifamily Hub Director will be responsible for obtaining all information from the Contract Administrator performing the original management review and initial appeal determination.
- The owner/agent may request a meeting with the Multifamily Hub Director (or, at the discretion of the Multifamily Hub Director, a representative) to present verbal arguments, however the meeting must be requested and scheduled during the 30 calendar day period following the transmittal date of the initial appeal decision letter.
- The final appeal decision must be in writing and transmitted to the owner/agent by the HUD Multifamily Hub Director within a 45 calendar day period following receipt of the final appeal letter or 45 calendar days upon conclusion of the meeting with the owner/agent.



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Customer 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 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.

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.



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Member Spotlight Introducing Antonia Avila

Antonia is a Local Contract Specialist with NTHDC. She has been conducting MORs in South Florida for over 2 years. What she enjoys most about her current position is traveling to various locations and having the opportunity to meet the Owners and Agents. Antonia finds it gratifying to share her knowledge and assist management staff in understanding HUD policy and procedures.

Prior to NTHDC, Antonia worked within the Section 8 Program and HUD placing homeless individuals in affordable housing. She also has over 10 years of Property Management experience.

Her hobbies are photography, crafts, going to the beach and watching movies. She also enjoys visiting the different lighthouses in Florida.



Reminder on Utility Allowance Data

For many properties, this year marks the year for a required Baseline Utility Allowance Submission. A Baseline year requires the Owner/Agent to conduct a full analysis as detailed in [HUD Notice 2015-04](#) for all unit types. In this Baseline cycle, the outcome of the full utility analysis establishes the utility allowance for each bedroom type.

As a reminder, HUD does not require the Owner/Agent to submit full data (utility bills) to the Contract Administrator (CA). If the Owner/Agent obtained actual monthly utility bills from a tenant, the Owner/Agent may submit a spreadsheet summarizing the average of the monthly bills. It is recommended to utilize the tool published with HUD Notice 2015-04. However, Owner/Agents may develop their own worksheets to suit their needs, as long as they provide HUD/CA with adequate documentation. If Owner/Agents elect to submit a spreadsheet, the actual utility bills may be requested at the discretion of HUD/CA. These bills, regardless of whether they are provided to HUD/CA, must be retained by the Owner/Agent for three years.

Should you have any questions regarding the submission of a baseline analysis for your property, contact your [contract specialist](#).



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Spotlight on the Section 8 Renewal Policy Guide

The HUD Section 8 Renewal Policy Guide provides comprehensive guidance for renewing expiring Section 8 HAP contracts and incorporates all procedures contained in previous Section 8 expiring contract Housing Notices. The Policy Guide is a living document that is expected to over time contain nearly all of the information related to the renewal of expiring Section 8 HAP contracts.

Owners and Agents of Section 8 properties are encouraged to become familiar with the guidance found in the Renewal Policy Guide. HUD occasionally updates the guidance and posts the new Renewal Policy Guide along with a Transmittal of Changes to the [Section 8 Renewal Policy Guide website](#). This article touches on various owner/agent responsibilities but is not meant to be an all-encompassing resource that outlines each of the owner/agent duties. You are reminded to bookmark and frequently visit the Section 8 Renewal Policy Guide in its entirety when seeking guidance related to the Section 8 HAP contract.

Owners are reminded that if the project's HAP contract is expiring they must give a one-year written notice to the tenants of the contract's termination or expiration. The one-year notification letter must state the owner's intentions to renew or not renew at the time of the contract's expiration (Section 11-4). However, a one year notification is not required when an owner is terminating a contract early to renew the contract for 20 years or the remaining life of the use agreement. Appendix 11-2 of the Section 8 Renewal Policy Guide is a sample One-Year Notification Letter to be used when the Owner intends to renew.

Owners who are submitting a budget-based rent increase or a Mark Up To Market (MUTM) increase must follow the tenant notification procedures outlined in 24 CFR Part 245 Subpart D. A copy of the 30 day notice provided to the tenants as well as the Owner's Certification of Compliance with the tenant comment period must be included to the Contract Administrator as part of your submission (Section 2-17 A. 1.).

For projects that have paid tenant utilities, the owner must submit an analysis of the project's Utility Allowance (See HUD Notice 2015-04) so that processing may be completed any resulting change be effective on the date of the contract anniversary. Owners are encouraged to submit their Utility analysis prior to 150 days from contract anniversary, but should not submit more than 180 days from the contract anniversary. In the event that the owner's utility analysis results in a possible decrease in the utility allowance(s) to the tenants, owners must follow the tenant notification procedures in 24 CFR Part 245. A copy of the 30 day notice provided to the tenants as well as the Owner's Certification of Compliance with the tenant comment period must be included in your submission to the Contract Administrator (Section 2-17 B. 1.)

For contracts that are expiring, at least 120 days prior to but no earlier than 180 calendar days before expiration of the Section 8 Contract the owner must submit (Section 2-17 A. 2.):

- Contract Renewal Request Form, HUD 9624
- An analysis of the project's Utility Allowances (See HUD Notice 2015-04)
- If applicable:
 - a. The OCAF Rent Adjustment Worksheet, HUD 9625;
 - b. A RCS; and/or
 - c. A budget-based rent increase request prepared in accordance with Section 2-15 of the Section 8 Renewal Policy Guide

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If you are not already receiving this publication via e-mail, or if you have ideas, suggestions or questions for future publications, we'd like to hear from you.

Please visit the [NTHDC website](#) OR send an email to michelle.thomas@cgifederal.com



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Spotlight on the Section 8 Renewal Policy Guide (continued)

Projects that are eligible for the auto OCAF rent adjustment in years of Amend Rents should expect to receive an auto OCAF letter from your Contract Administrator at approximately 150 calendar days before the anniversary date of the contract. Upon receipt of the auto OCAF letter and Exhibit A, the owner will review the OCAF adjusted rents and will (Section 2-17 B. 3.):

- a. Elect to receive the auto OCAF rent adjustment, or
- b. Request a budget-based rent adjustment (if permitted under the terms of the renewal contract). An owner/agent may request a zero budget-based rent adjustment to maintain rents at current levels. The owner/agent does not need to submit a budget if they check the appropriate box on the auto OCAF letter and return it to the Contract Administrator.

If the owner/agent wishes to move forward with the application of the auto OCAF, they must return the auto OCAF letter to the Contract Administrator with the appropriate box checked.

If the owner/agent wishes to move forward with a budget-based rent adjustment, they must return to the Contract Administrator the signed auto OCAF letter indicating the want for a budget based rent adjustment as well as all documentation required for a budget-based rent adjustment as defined in HUD Handbook 4350.1 Chapter 7.

Projects that are not participating in the auto OCAF rent adjustment in years of Amend Rents must again follow the tenant notification procedures in 24 CFR Part 245 Subpart D if the rent increase is not an OCAF adjustment. Whenever an owner's utility analysis results in a possible decrease in the utility allowance(s) to the project tenant notification procedures in 24 CFR Part 245 must also be followed even if the rent adjustment type is an OCAF adjustment. Should a notice need to be issued for both a rent increase and a utility allowance decrease, a single notice is sufficient so long as the owner clearly identifies both items within the notice. A copy of the 30 day notice provided to the tenants as well as the Owner's Certification of Compliance with the tenant comment period must be included in your submission to the Contract Administrator (Section 2-17 C. 1.).

Owners must submit the package to the contract administrator at least 120 days prior to but no earlier than 180 days before the anniversary date of the contract:

- OCAF Rent Adjustment Worksheet , HUD 9625;
- An analysis of the project's Utility Allowances (See HUD Notice 2015-04)
- If applicable:
 - a. An RCS; and/or
 - b. A budget based rent adjustment, prepared in accordance with Section 2-15 of the Section 8 Renewal Policy Guide or a RHS approved budget that does not exceed comparable market rents.

If your project is subject to a Rent Comparability Study and is in a multiyear long term contract under Option One, Mark-Up-To-Market, Option Two, Contract Renewals for Other Projects with Current Rents at or Below Comparable Market Rents, or Option Five, Portfolio Re-engineering Demonstration Program (Demo) Contracts, the owner must (Section 2-17 C. 4.):

- Submit a new RCS at the end of each five-year life cycle of the Rent Comparability Study. The new RCS must be reviewed in accordance with the instructions found in Chapter 9 of the Section 8 Renewal Policy Guide.

Again, the information included in this article is a brief summary of owner/agent requirements and is not meant to be an all-encompassing document. This does not replace the requirement for the owner/agent to be familiar with and follow the regulations outlined in the Section 8 Renewal Policy Guide.



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

1509 W. Swann Ave. Suite 250, Tampa, Florida 33606
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