MANAGEMENT OCCUPANCY REVIEW

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Who is CMS?

- Located in Bremerton, WA, Contract Management Services (CMS) is a division of the Bremerton Housing Authority since 2000, CMS serves as the Performance Based Contract Administrator (PBCA) for the Department of Housing and Urban Development (HUD) for Project Based Section 8 properties in Washington, Utah, Nebraska and sub-contractor for Hawaii.
- CMS currently has oversight responsibility for over 700 contracts, representing approximately 30,000 project-based Section 8 units throughout the states of Washington, Utah, Nebraska and Hawaii.
- CMS's philosophy in fulfilling its duties as HUD's PBCA is to maintain a service-oriented approach designed to assist property owners and agents in understanding and complying with the many complex federal housing regulations pertaining to their properties.



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COMMON MOD FINDINGS	
COMMON MOR FINDINGS	
□ Overview	
□ Application □ Tenant File	
□ EIV Reports and Security Documents	
□ Tenant Selection Plan □ Other Common Findings	
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COMMON MOR FINDINGS	
Findings Overview	
All findings are required by HUD to include:	
Condition: The problem description Criteria: The statutory regulatory or HUD Handbook requirements	
that were not met	
Cause: Why the condition occurred	
 Effect: What happened or what may happen as a result of the condition/finding 	
Corrective Action: How to address the cause to prevent re- converges with a time frame for the O/A to repeated.	
occurrence, with a time-frame for the O/A to respond	
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	<u> </u>
COMMON MOR FINDINGS	
Finally as Occasions	
Findings Overview	
Discussion of potential findings during exit interview does	
not mean those same findings will show on final MOR Finding Summary Report	
Corrective action most often does not need to begin until	
receipt of final MOR Report	
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Application · Questions relating to gender must be optional, if it is not · Application Reject Letter has no explanation of why a household was rejected <u>CMS</u> © 2017 Contract Management Services **Tenant Files** · Citizen forms are not updated when a status or HH composition

- is changed or information reported to TRACS does not match
- · Documents are not completed entirely (blank fields)
- · Missing Date and Time an application was received by OA
- · Incorrect address(es) on 9887
- Race and/or Ethnicity Codes do not match info reported on
- · Income, Asset, and/or Expense Calculation errors
- Security Deposit amounts in tenant files do not match
 - · Watch out for transferred households!

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EIV Reports and Security Documents

- Pull your monthly and quarterly reports no more and no less than what your policy states, but never less than **HUD** requirement
- · Income Report must be pulled within 90 calendar days (not 3 months)
- · Resolve any discrepancies that show up on any reports within 30 days

EIV User versus Non-User Documents - What do you need?

- Owner's Letter for HSC
 Original and Current CAAF/UAAF (including hard copy original user request)
 Rules of Behaviors who needs it and how often?
- Security Training Certificate who needs it and how often?



EIV Master File Reports • Minimum Master File Report Requirements: New Hire Report Quarterly · Multiple Subsidy Report Quarterly · Failed EIV Pre-Screening Report Monthly · Failed Verification Report Monthly · Deceased Tenant Report Quarterly · No Income Report Per OA's Policies and Procedures Documentation that was obtained to verify a discrepancy must be in the tenant file. © 2017 Contract Management Services <u>CMS</u> **EIV Income Discrepancy Report** • For discrepancies, owner must: • Print the Income Discrepancy Report at the same time they print the Income Report Review and Resolve any discrepancies at time of certification or within 30 days of the EIV Income Report date · Retain the Income Discrepancy Report and detailed information on the resolution of the discrepancy and whether or not it was found to • Ensure information in TRACS agrees with 50059 in tenant file -50059 must be corrected and retransmitted if differences is noted. © 2017 Contract Management Services **CMS** Tenant Selection Plan • Be specific about what income limit(s) apply to your • Pre-1981 Universe versus Post-1981 Universe · Extremely Low, Very Low, and Low Income Limit · Streamline SSN Rules • Equal Access Language

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Other Common Findings

- AFHMP is older than 5 years old or not updated with new OA info
- Recertification Notices are missing or not given to households timely
- · Initial Lease Term is less than 1 year
- Move-In inspection was signed after the household's move-in date.
- Policy vs Addendum which one requires HUD approval?
- · Can we tell how old a verification document is?
- Tenant Files do not have current version of important documents:
 - · House Rules
 - · Pet Rules



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HOW TO CORRECT MOR FINDINGS

- □ Timeline & Basic
- □ Desk Review Items
- □ Corrections to Previous/Current Certifications
- ☐ Refund due to a Household
- □ Balance due to the Project
- □ 5% EIV Penalty



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HOW TO CORRECT MOR FINDING

Timeline & Basic

- $\boldsymbol{\cdot}$ 30 days from the date an MOR report is provided
- Respond using item numbers
- MOR remains in an "OPEN" status until all findings are closed

Who needs to provide responses?

Everyone!

No matter how good or bad your MOR score is, if there are any findings listed, they must be addressed!



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Desk Review Items

- If you received findings for onsite documents, such as TSP, House Rules, EIV Policies and Procedures, etc:
 - Update the form according to the HUD 4350.3 and bring them to
 - · Submit the updated document

If you received a finding for failure to provide required document, simply provide it along with other corrected items. The document will be reviewed in accordance to HUD 4350.3. If it is determined that the document is not in compliance, you will be required to make necessary updates.



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Correction to Previous/Current Certs

- · Obtain necessary document to clarify any missing information
- Complete a corrected 50059 and re-submit the certification to TRACS
- Updated Income Information
- · Updated Asset Information
- Updated Household Member Information, such as Citizenship Status, DOB, etc.
- Adjusting a MO Date submitted to TRACS and make adjustment to upcoming Voucher Request

What do you do for time-sensitive items?

You cannot do anything about what already happened in the past. Examples include a rejected application or a missing application in a current tenant file.

To close these types of findings, certify as to what the policy is going forward to ensure that these issues will not be repeated.



Refund Due to a Household

· Provide information as to how and when the refund was processed

FAQ:

Can the O/A make adjustment to the upcoming voucher to collect the differences after the corrected 50059 is submitted to TRACS?



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5% EIV Penalty · What causes it? · Not having access to EIV · Not using the EIV system in its entirety · What happens next? Once all EIV findings are closed, the voucher team will be notified that your property is no longer subject to the penalty • You can get your money back...for now <u>CMS</u> © 2017 Contract Management Services **EIV DOCUMENTATION** □ EIV User Types □ EIV Reports □ Example EIV Documentation □ TRACS Rules of Behavior □ EIV Rules of Behavior □ Security Awareness Training © 2017 Contract Management Services <u>CMS</u> **EIV User Types** • User Administrator (EIV Coordinator) Grants Access & Assigns Roles to EIV Approves EIV User's electronic UAAF · Request User re-certification bi-annually • User (EIV User) • Access to view Tenant Income & extracts reports • Reviews property reports at MOR (CA) • Reviews property access roles & documents · User must Recertify Bi-annually <u>CMS</u> © 2017 Contract Management Services

EIV Reports · Existing Tenant Search - Identifies applicants already listed as a tenant in HUD databases · Run report at time of application for admission • Retain search results and supporting documentation for 3 years - If admitted, retain this documentation for term of tenancy plus 3 years · Household Summary Report · Provides summary of current, active certifications in TRACS Shows whether each member is Verified, Failed, Not Verified, or Deceased · Run report at time of recertification · Retain report with supporting documentation in tenant's file for term of tenancy plus 3 years <u>CMS</u> © 2017 Contract Management Services **EIV Reports** · Income Report • Provides employment and income information for each household member from HHS and SSA Identifies household members who may not have reported complete and accurate income information and may be receiving multiple subsidies · Serves as third-party verification of employment and income · Run report within 90 days after move-in is transmitted to TRACS, at each annual and interim recertification, and as needed according to · Retain with applicable 50059 for term of tenancy plus three years © 2017 Contract Management Services **CMS EIV Reports** • Failed EIV Pre-Screening Report • Identifies household members with missing or invalid personal identifiers such as last name, date of birth, or SS number in TRACS • Follow up with household if new documentation needs to be obtained to update TRACS • Note exemptions from SSN requirements on the report · Run report on a monthly basis • Retain report in master file for 3 years and related documentation in in each applicable tenant file for term of tenancy plus 3 years

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EIV Reports Income Discrepancy Report Identifies households where there is a difference of \$2,400 or more between what was reported in EIV and TRACS Discrepancies must be reviewed and resolved at time of recertification or within 30 days of income report date Run report at same time as income report and for every annual and interim recertification, at minimum Retain report and any documentation related to resolution of discrepancies in tenant file for term of tenancy plus 3 years

EIV DOCUMENTATION

EIV Reports

- · New Hires Report
 - Identifies household members who have new employment within last 6 months and helps ensure changes in income are being reported properly

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- If report shows new employment, contact identified member to provide supporting documentation of income
- · Run report on a quarterly basis
- Retain report in master file for 3 years along with notes as needed
- Retain New Hires Detail Report in applicable tenant file and correspondence with member, third-party verifications, and 50059(s) for the identified households for the term of tenancy plus three years

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EIV DOCUMENTATIO

EIV Reports

- · Multiple Subsidy Report
 - Identifies household members who may be receiving rental assistance at more than one location
 - Unlike the Existing Tenant Search, this report provides ongoing checks of current tenants
 - If a match is found, obtain more information and give member opportunity to explain the situation and take action where needed
 - · Run report on quarterly basis
 - Retain report in master "Multiple Subsidy Report" file for 3 years
 - Retain Multiple Subsidy Detail Report for the identified households for term of tenancy plus 3 years in applicable tenant file



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EIV Reports • Deceased Tenant Report • Identifies members reported

- · Identifies members reported by SSA as being deceased
- Identifies members reported by SOA as being deceased
- Confirm status of any identified members in writing with head of household, next of kin, or contact person provided
- If confirmed, complete recertification for household within 30 days or a move-out dated to the earlier of 14-days after date of death or date unit was vacated
- Correct all discrepant information in TRACS including overpayment of subsidy within 30 days from date of report
- · Run report on quarterly basis
- · Retain in master EIV file



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EIV Reports

No Income Reported in 50059

Identifies household members who passed identity match against SSA's records but do not have income in TRACS

Run report according to site policy requirements

Retention of this report is not required

No Income Reported by HHS or SSA

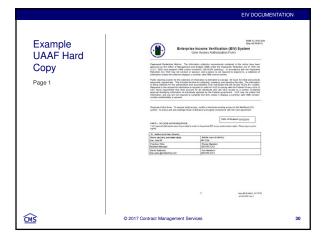
Identifies household members who passed SSA identity test but no income was reported by HHS or SSA

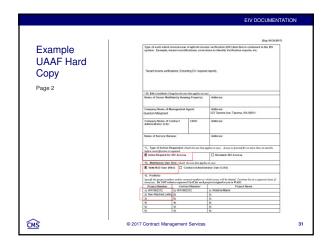
Owner must verify each individual list discloses income and obtain written third-party verification

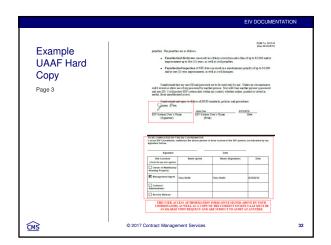
Run report according to site policy requirements

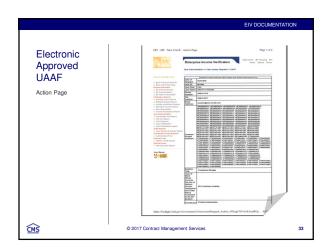
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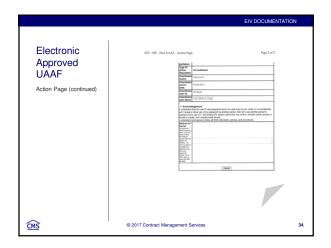
· Retention of this report is not required







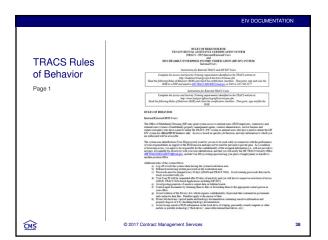


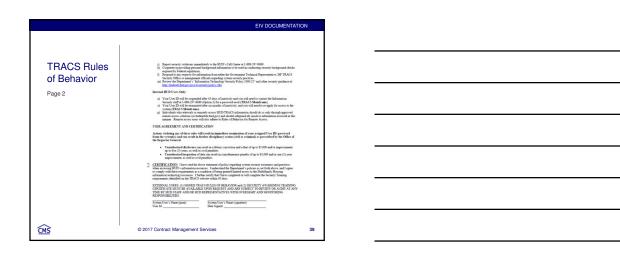


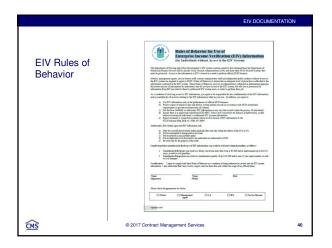


EIV DOCUMENTA	TION
Documents Onsite	
CAAF (Coordinator Access Authorization Form) Hard Copy Request Form Electronic Approval	
 http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/coordinatoraccess.pdf 	
UAAF (User Access Authorization Form) Hard Copy Request Form	
 Electronic Approval http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/useraccess.pdf 	
 EIV Application and Online Access for Multifamily Housing Programs 	
 http://portal.hud.gov/hudportal/HUD?src=/program offices/housing/n h/rhiip/eiv/eivapps 	<u>nf</u>
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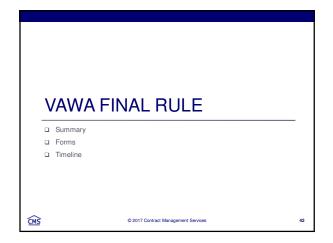
TRACS Rules of Behavior Tenant Rental Assistance Certification System (TRACS) HUD's database for storing tenant information originating from the 50059 form. integrated Multifamily Access eXchange (iMAX) Software system used to transmit tenant 50059s and HAP Payments (Vouchers) to TRACS. Acceptable TRACS Rules of Behavior Forms Rules of Behavior for Tenant Rental Assistance Certification System Rules of Behavior for Use of Enterprise Income Verification (EIV) Information (for individuals without access to EIV Systems)











Summary • Final rule published November 16, 2016 · Protects housing for survivors of domestic and dating violence, sexual assault, and stalking · Makes new emergency transfers available for survivors · Includes Low-Barrier Certification: · Under most circumstances, survivors only need to self-certify · Ensures third party documentation does not create a barrier for a survivor expressing their rights Requirements must be completely implemented by December 16, 2017 © 2017 Contract Management Services <u>CMS</u> **Forms** · VAWA - Appendix A (HUD Form 5380) Notice of Occupancy Rights · Must be customized by property • Replaces HUD Form 91066 VAWA - Appendix B (HUD Form 5381) Model Emergency Transfer Plan • VAWA - Appendix C (HUD Form 5382) Certification Forms · Must be attached to HUD 5380 Notice VAWA - Appendix D (HUD Form 5383) Emergency Transfer Request • HUD Form 91067 Lease Addendum HUD plans to provide further written guidance this year to include a sample lease addendum before updating the current form © 2017 Contract Management Services <u>CMS</u> **Timeline** • Between December 16, 2016 - December 15, 2017: O/As must provide Notice (Appendix A) and Certification forms (Appendix C) to each household during the annual recertification or lease renewal process or through other means during first year rule is effective After December 16, 2017: · Appendix A and Appendix C must be provided to all tenants at move-in or when assistance is being denied

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