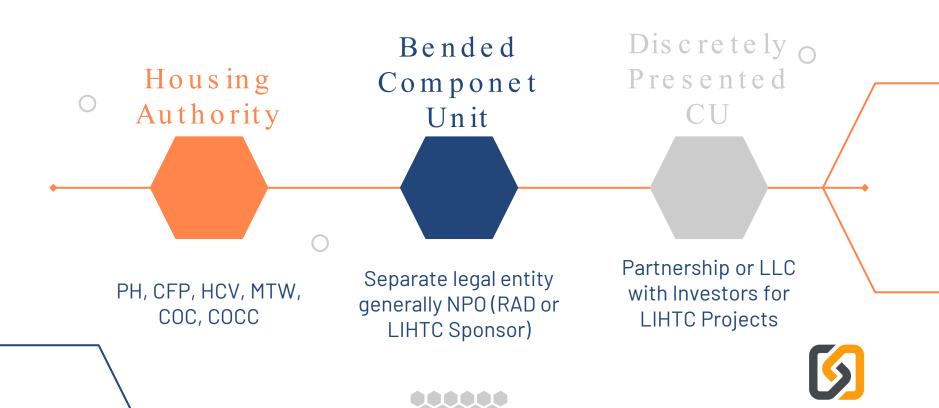
RAD & Multifamily Housing

What You Need to Know





HA vs CU...



smithmarion

SEPERATE REPORTING UNITS

OHOUSING AUTHORITY | CU

BA/SL	COCC	BCU	DPCU
Easiest and fast solution	If you have one also quick easy solution	Tricky sperate legal entity	Most complex option



Business Activities State and Local

Pros

Quick easy, no HUD approval to create, no separate bank account

Cons

Under EIN of HA, generally in HA pooled cash



COCC

Pros

Quick easy, defederalized fund

Cons

Under EIN of HA, generally in HA pooled cash



Blend Component Unit (Non-profit)

Pros

Legally separate entity, grant fundings not available to HA

Cons

Annual tax return, separate cash account



Discretely Presented Component Unit

(For-Profit)

Pros

Legally separate entity, generally fund by private equity

Cons Annual tax return, "partners" investors



USES FOR NPO IN HOUSING

Recapture

HUD Recapture settlement funds

Non HUD

Old LIHTC out of 15 year Development

RAD De a ls

Convert to RAD in PBRA or PBV

Grants

Grants not available to Housing Authorities

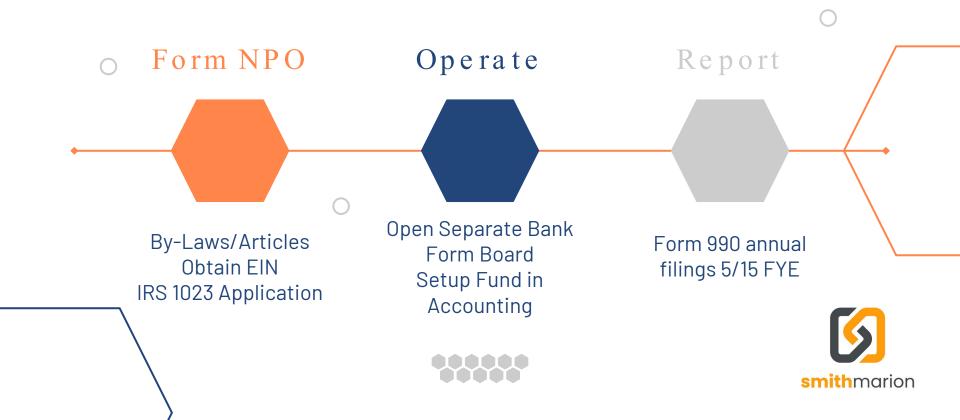


LIHTC

LIHTC require a NPO Sponsor



In the Beginning...





NPO

Forming a Nonprofit Organization



SEVERAL DIFFERENT TYPES

o 501 (C)

3	5	7	8
Charitable, Religious, Education (tax deductible)	Labor / Agriculture	Social and Recreation Clubs	Fraternal Beneficiary





THREE STEPS

BYLAWS

How the Nonprofit will operate.

ARTICLES

Formal documents to create corporation

Employer ID Number

EIN registered with IRS





1002 E7	GROSS RECEIPTS	
1023 EZ	3 year under \$50,000	
3 pages	> \$250,000 assets	

1 ()	2		3	
26	p	a	g	e	S

Not meeting 1023EZ requirements







We Challenge Ourselves We Grow with our Team We Fulfill Commitments We Lead by Example

- returns
- · We are advisers
- We are committed to great work

Application for Tax-Exempt Status

1023-EZ \$1,000-1,500 1023 \$2,000-2,500

- File as 501(c)3
- · Past 3 years gross receipts under
- · Expected gross receipts under \$50,000 next 3 years
- · Organized as corporation, association or charitable trust

Short Form Tax Returns

990N 199N & \$225 RRF-1

- Gross receipts under \$50,000
- 990-EZ

199 & \$450-800 RRF-1

Long Form Tax Returns

990 199 & \$850-2,500 RRF-1

- All other organizations
 Grantors prefer this form





GUIDE STAR

www.guidestar.org

"This is the Future of Nonprofit Financial Reporting"





REPORTING

Back to the Professionals







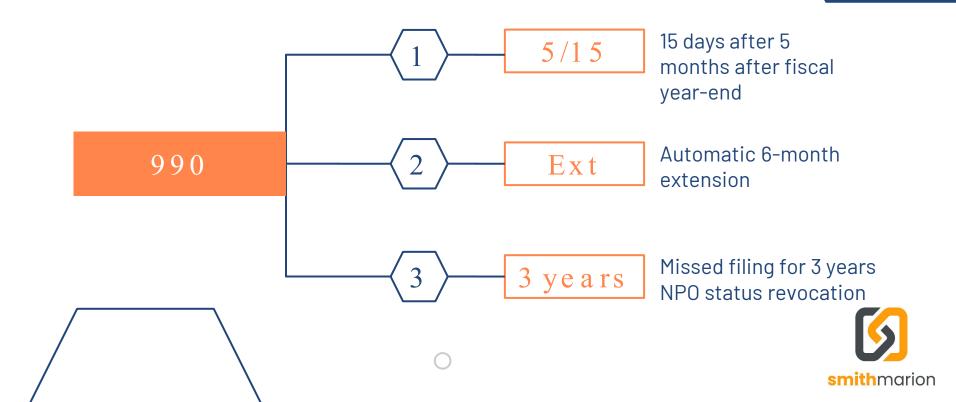


990N	Gross Receipts <\$50K	
990EZ	Gross Receipts <\$200K <u>&</u> Total Assets <\$500K	
990	Gross Receipts >\$200K <u>OR</u> Total Assets >\$500K	





IRS 990 DEADLINES



990T Form

Unrelated
Business Income
(UBIT)

Not purpose of NPO granted by IRS

Exemptions

Debt Free Building
Use of all Volunteers





DPCU

Forming a Partnership or LLC



SEVERAL DIFFERENT TYPES

• FOR PROFIT ENTITIES

LP	LLP	LLC
General	Limited Liability	Limited Liability
Partnership	Partnership	Corporation







THREE STEPS

BYLAWS

How the Entity will operate.

ARTICLES

Formal documents to create corporation

Employer ID Number

EIN registered with IRS

AUDIT LEVELS

Financial

Financial Statements are fairly stated



GAS (Yellow Book)

Internal Controls meet low level of risk threshold



Compliance Controls meet low level of risk threshold







Overvie w

General Knowledge







RADFoundation

Section 8

RAD is built on Section 8 platform

PBV vs PBRA

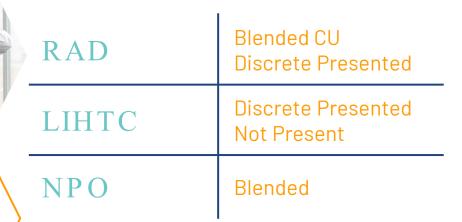
Have to choose one

Process

Application, CHAP, Update Plan, Provide Financing, Issue Commitment, Close



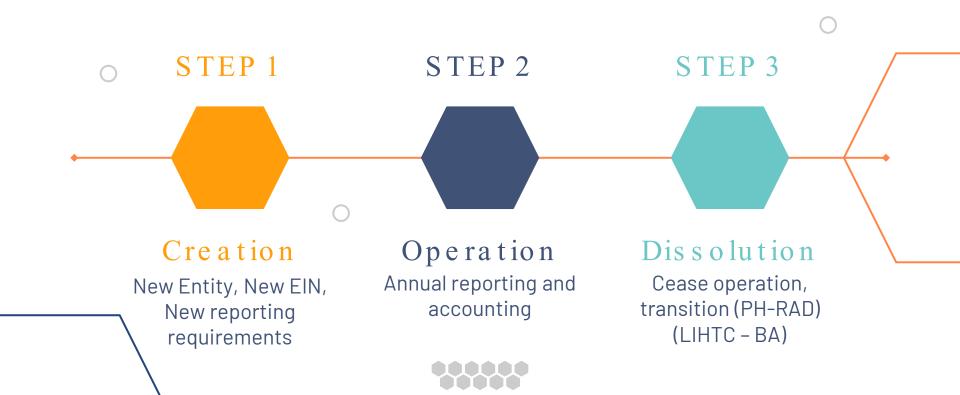


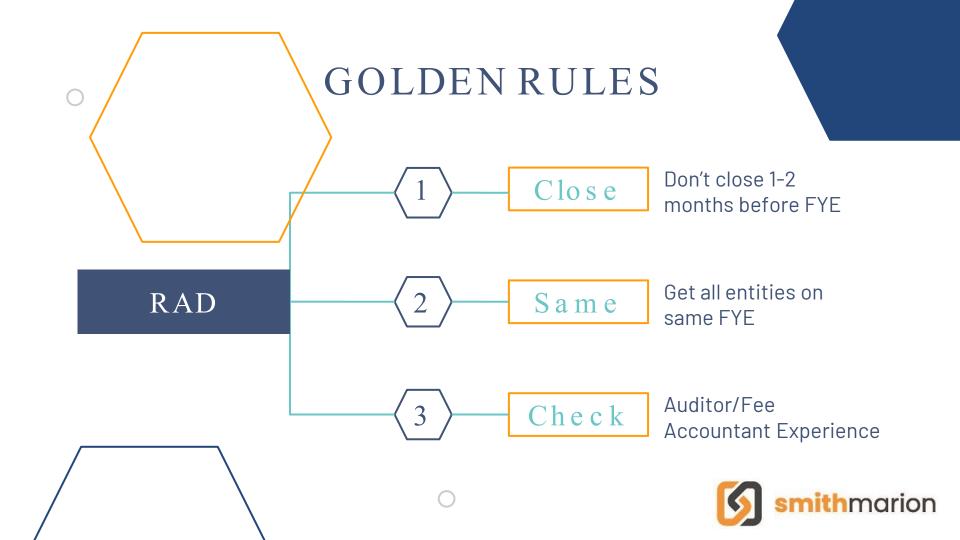






LIFE OF COMPONENT UNIT







PBRA



SEPARATE LEGAL ENTITY?

New EIN

Separate audit required for each EIN and taxes

Multi-family Under HA

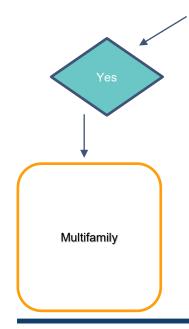
Owner Certified Submission

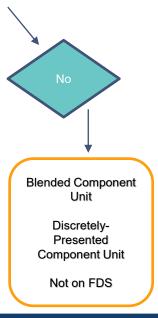






Will the project still be owned by the PHA and have the same TIN







PBRA PROS LIST

- Surplus cash can be unrestricted
- Source of Funding for Capital Improvements (R&R)
- No PRORATION
- Contract rents with allowable annual increases







PBRA CONS LIST

- Rent capped at FMR
- New HUD REAC and TRACs
- Only option if PH only HA
- Separate Audits (HA & New EIN)

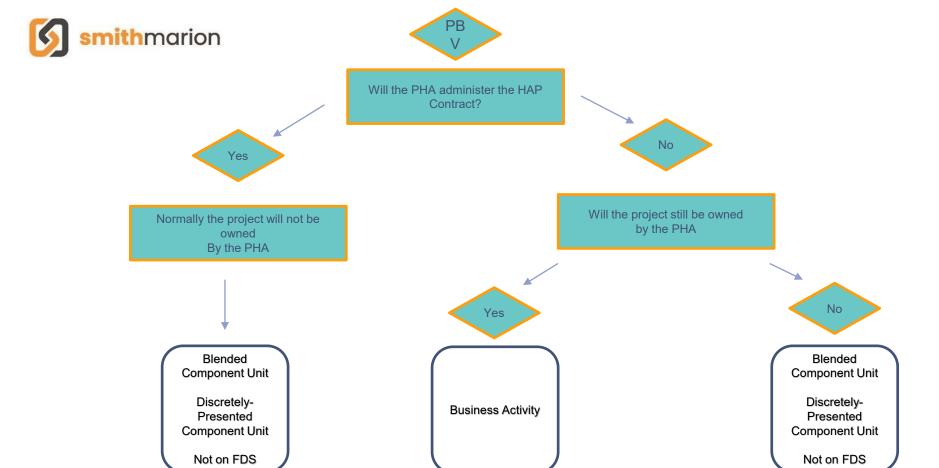




PBV









PBV PROS LIST

- HCV is already known by the team
- Limited learning curve, software conversion
- COCC fees are known







PBV CONS LIST

- Rent capped reasonable rents
- Admin fee and related proration
- 1 year till mobility







CONVERT

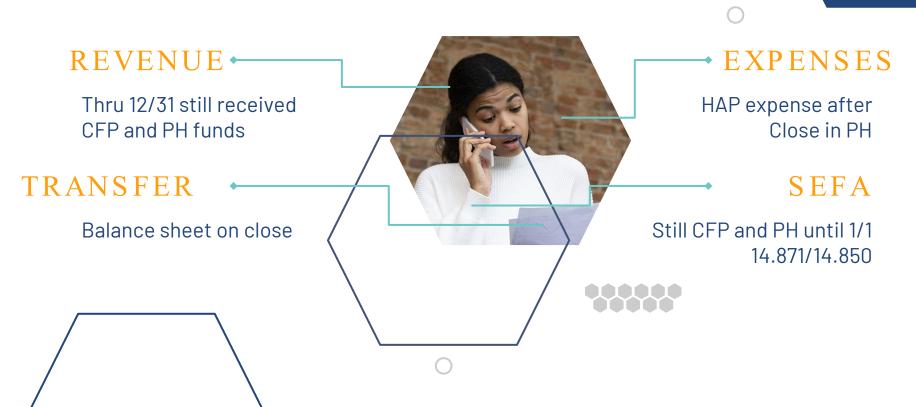
Moving To Work's Impact on Accounting







YEAR OF CONVERSION



Housing Authority converts to RAD mid-fiscal year. The first 9 months are Public Housing's last 3 months are PBV. The project is disposed to a Blended Component Unit (BCU). As of Year-End all Assets, Liabilities, and Net Position would be transferred to BCU.

	Public	Blended		
FDS	Housing	CU	Elimination	Totals
70600	12,000			12,000
70800	-	3,000	(3,000)	-
97300	(3,000)		3,000	-
	9,000	3,000	-	12,000
		_		



Housing Authority converts to RAD mid-fiscal year using Business Activity. No new entity simply moves from column A to column B.

Pusinoss Activitios

	Business Activities				
_	PH 2020	BA 2020		PH 2021	BA 2021
Cash	7,000	-		-	7,000
Cash Restricted	3,000	-		-	3,000
Accounts Receivable	1,000	-		-	1,000
Capital Assets	1,500,000	-		-	1,500,000
Accounts Payable	(2,000)	-		-	(2,000)
Security Deposits	(3,000)	-		-	(3,000)
Net Position	(1,506,000)	-		-	(1,506,000)
					`
Tenant Rent	(150,000)	-			(150,000)
HUD Grants	(350,000)	-		(350,000)	-
Admin	125,000	-			125,000
Maintenance	225,000	-			225,000
Depreciation	175,000	-			175,000
Housing Assistance Payments	-	-		350,000	(350,000)
Change in Net Position	25,000	-		-	25,000



Housing Authority converts to RAD mid-fiscal year using Multifamily under PHA EIN.

No new entity simply moves from column A to column B.

	Multifamily Program (PHA EIN)					
					HUD MF	
				HUD R	EAC	
_	PH 2020	MF 2020		PH 2021	MF 2021	
Cash	7,000	-		-	7,000	
Cash Restricted	3,000	-		-	3,000	
Accounts Receivable	1,000	-		-	1,000	
Capital Assets	1,500,000	-		-	1,500,000	
Accounts Payable	(2,000)	-		-	(2,000)	
Security Deposits	(3,000)	-		-	(3,000)	
Net Position	(1,506,000)	-		-	(1,506,000)	
Tenant Rent	(150,000)	-			(150,000)	
HUD Grants	(350,000)	-		(350,000)	-	
Admin	125,000	-			125,000	
Maintenance	225,000	-			225,000	
Depreciation	175,000	-			175,000	
Housing Assistance Payments	-	-		350,000	(350,000)	
Change in Net Position	25,000	-		-	25,000	



Housing Authority converts to RAD mid fiscal year using Component Unit.

New entity still simple moving from column A to column B.

NEW EIN

Component Unit

NEW EIN

(350,000)

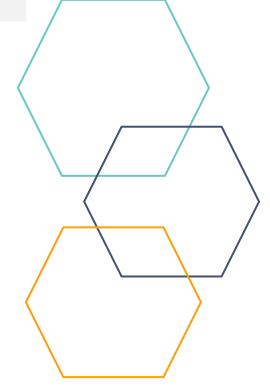
25,000

				HUD MF
			HUD	REAC
	PH 2020	BC/DCU 2020	PH 2021	BCU/DCU 2021
Cash	7,000	-	-	7,000
Cash Restricted	3,000	-	-	3,000
Accounts Receivable	1,000	-	-	1,000
Capital Assets	1,500,000	-	-	1,500,000
Accounts Payable	(2,000)	-	-	(2,000)
Security Deposits	(3,000)	-	-	(3,000)
Net Position	(1,506,000)	-	-	(1,506,000)
Tenant Rent	(150,000)	-		(150,000)
HUD Grants	(350,000)	-	(350,000)	-
Admin	125,000	-		125,000
Maintenance	225,000	-		225,000
Depreciation	175,000	-		175,000

25,000

Housing Assistance Payments

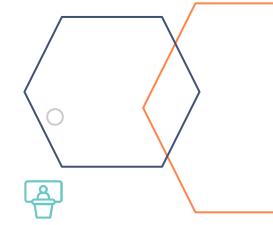
Change in Net Position





350,000

CONCLUSIONS











RAD is coming is it time for you to convert

Run the #s

PBRA vs PBV vs PH



Unvested party with experience









AUDIT PROCESS





Common Misconceptions

100% Accurate

Materially correct not perfect (2% of revenue)

Find Fraud

By product of audit not purpose of compliance audits



Does Understand Duties

Not here to fix the books.

Not able to make management decisions



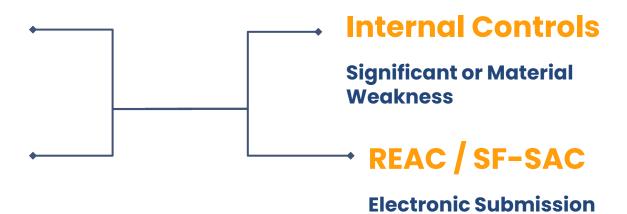
3 Levels of Audits

Financials

Materially correct

Compliance

Significant or Material Weakness



POSSIBLE 3 SEPARATE AUDITS

All Same Auditor or All Different









Housing Authority

PHA + BCU + DPCU



BCU

PBRA RAD entity will require its own audit and FDS MFH

DPCU

LIHTC audit required on 12.31 FYE





FINDINGS

Financial

<u>Program</u>

Internal Controls Over Financial

Internal Controls Over Complaince

Accounting Dept

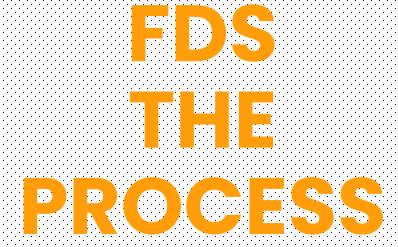
Program Department

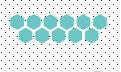
Bank Recon, Journal Entries, Disbursements, Allowable Costs

Eligibility, Inspections, Recertification, 5058s

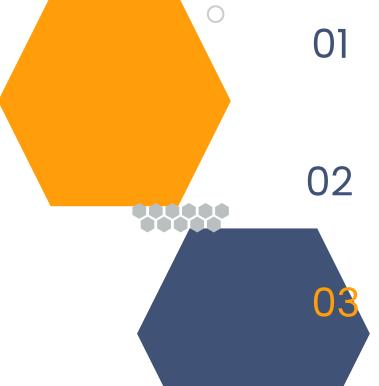








THE FDS PROCESS HOUSING AUTHORITY



ITED SUBMISSION DUE 60 DAYS AFTER YEAR END.

AUDITED SUBMISSION 9 MONTHS AFTER YEAR END.

MORE THAN ONE PERSON CAN WORK ON FDS AT A TIME IF THEY HAVE ID.





smithmarion

ROLES ON FDS

FASPHA-PHA (FIA) - INPUT ROLE ONLY FASPHA-PHA DIRECTOR (PID) -GENERALLY ED OR CFO HIGHEST LEVEL

ROLE

 FASPHA-PHA SUBMITTER (SMT) –
 GENERALLY FEE ACCOUNTANTS INPUT AND SUBMIT

 FASPHA-PHA VERIFICATION (CPV) – AUDITOR ONLY ABLE TO VERIFY DATA

GENERALLY, YOU SHOULD HAVE SOMEONE IN THE LAST THREE ROLES – THE FIRST ROLE IS OPTIONAL

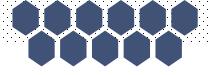


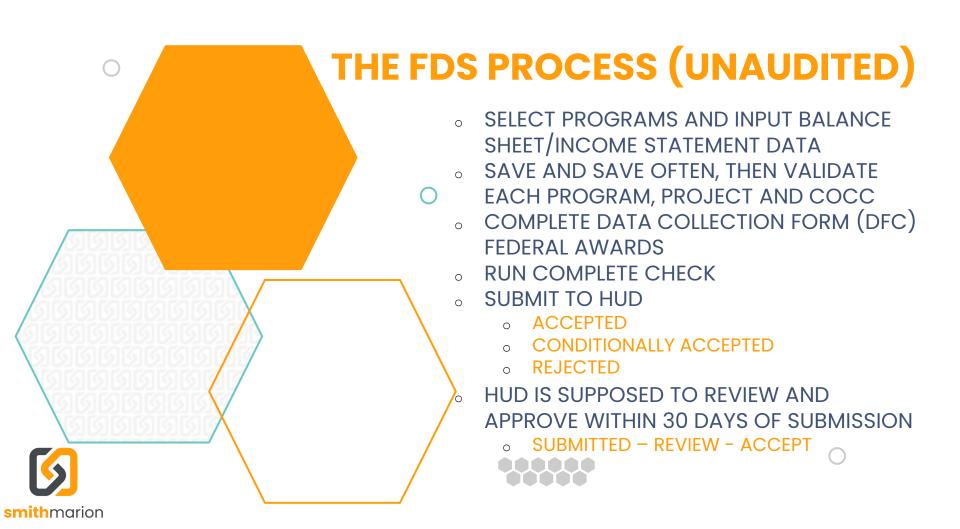


THE FDS PROCESS (UNAUDITED)

- DRAFT FDS SUBMISSION
 - SINGLE AUDIT/NON-SINGLE AUDIT (\$750,000 SEFA)
 - NON-ASSET MANAGEMENT
 - COCC/ELIMINATIONS
 - ELIMINIATIONS ONLY
 - ASSEST MANAGEMENT
 - WITHOUT COCC/ELIMINATIONS
 - COCC/ELIMINATIONS
 - ELIMINATIONS ONLY
- THIS IS IMPORTANT TO GET RIGHT. IF YOU
- SELECT INCORRECTLY, THE ENTIRE SUBMISSION MUST BE DELETED IN ORDER TO CHANGE THESE SELECTIONS!









FDS THE PROCESS (AUDITED)

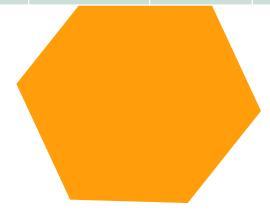
DRAFT FDS SUBMISSION

- SINGLE AUDIT/NON-SINGLE AUDIT (\$750,000 SEFA)
- NON-ASSET MANAGEMENT
 - COCC/ELIMINATIONS
 - ELIMINATIONS ONLY
- ASSET MANAGEMENT
 - WITHOUT COCC/ELIMINATIONS
 - COCC/ELIMINATIOS
 - ELINIMATIONS ONLY
- AGAIN, IMPORTANT YOU MATCH THE UNAUDITED OR ELSE YOU CAN NOT COPY THE SUBMISSION DATA FROM UNAUDITED!

THE FDS PROCESS (AUDITED)



1	2	3	4	5	6	7
SELECT PROGRAMS AND INPUT BALANCE SHEET/INCOME STATEMENT DATA.	SAVE AND SAVE OFTEN, THEN VALIDATE EACH PROGRAM, PROJECT, AND COCC.	COMPLETE DATA COLLECTION FORM (DCF) FEDERAL AWARDS.	RUN COMPLETENESS CHECK	SUBMIT TO IPA (AUDITORS) ACCEPTED/ REJECTED	SUBMIT TO HUD	HUD SHOULD REVIEW AND APPROVE WITHIN 30 DAYS OF SUBMISSION * SUBMITTED – REVIEW - ACCEPTED







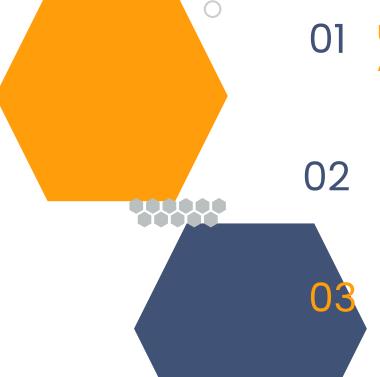
MOST COMMON REJECTIONS

- INTERFUND BALANCES OR LARGE % OF ASSET/LIABILITY
- FDS DOESN'T EQUAL VMS HAP / ADMIN NET POSITION
- UNAUDITED % CHANGE FROM AUDITED FDS
- CALCULATION OF RESTRICTED NET POSITION (ADD NOTE TO FS)
- CONDITIONAL ACCEPTANCE ISSUES NOT RESOLVED FROM UNAUDITED
- MANAGEMENT FEES FORMULA (UNIT MONTHS X RATE)





THE FDS PROCESS MULTIFAMILY HOUSING



UNAUDITED SUBMISSION DUE 90 DAYS AFTER YEAR END.

- 3/31 6/30
 6/30 9/30
 9/30 12/31
 12/31 3/31

AUDITED SUBMISSION 9 MONTH'S AFTER YEAR END.

- 3/31 12/31
 6/30 3/31
 9/30 6/30
 12/31 9/30

CAN FILE ONE AUDITED SUBMISSION IF **DONE BY 90 DAYS**



HE FDS TYPES (MFH REAC)



1	2	3	4
Owner Certified Unaudited submission EVERYONE CAN DO	14.195 Column of HA FDS (request waiver each year)	Uniformed Guidance (NPO A- 133 Audit) over \$750,000 Federal \$	HUD Audit Guide (For Profit) over \$500,000 Federal \$







CASH SECTION (111-119) CHECKING, SAVINGS, MONEY MARKET, CD < 90 DAYS



LINE 113 - CASH RESTRICTED OTHER
-HCV HAP CASH, FSS ESCROW CASH > 12 MONTHS, REPLACEMENT RESERVES

LINE 114 – CASH TENANT SECURITY DEPOSIT SHOULD MATCH 341 LIABILITY ACCOUNT

LINE 115 - CASH RESTRICTED FOR PAYMENT OF CURRENT LIABILITIES

-GRANT FUNDS RECEIVER IN ADVANCE, DEBT SERVICE PAYMENTS, FSS

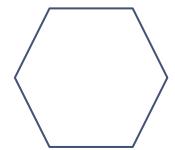
ESCROW < 12 MONTHS

LINE 111 - ALL THE OTHER CASH



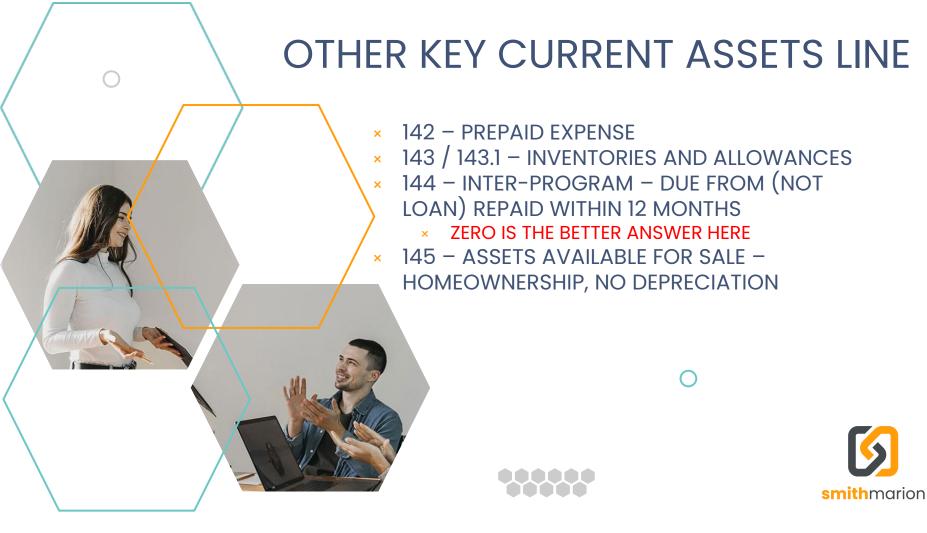






- O 1120 Cash Operation (unrestricted) similar to 111 cash
- 1191 Tenant/Patient Deposits Held similar to 114 cash
- 1310 Escrow Deposits would be prepaids in PHA
- 1320 Replacement Reserves (Restricted) similar to 113 cash
- O 1340 Residual Receipts (Restricted) similar to 113 cash









- 161 LAND ESTIMATE COST BASIS IF NOT KNOWN, ANY IMPROVEMENTS SHOULD BE IN 162
- 162 BUILDINGS INITIAL COSTS AND IMPROVEMENTS THAT EXTEND THE LIFE
- 163 FURNITURE, EQUIPMENT DWELLING ITEMS NOT ATTACHED TO THE BUILDING
- 164 FURNITURE, EQUIPMENT ADMIN ITEMS USED IN ADMINISTERING OR MAINTAINING
- O 165 LEASEHOLD IMPROVEMENTS LEASE PROPERTY AND CAPITAL LEASE ITEMS
- O 166 ACCUMULATED DEPRECIATION FOR LINES 162-165
- 167 CONSTRUCTION IN PROCESS CFP





CAPITAL ASSET – MultiFamily Housing



LINE 1410 – Land similar to 161

LINE 1420 – Building's similar to 162

LINE 1440 - Building Equipment (Portable)

LINE 1450 - Furniture for Project/Tenant Use

LINE 1460 – Furnishings

LINE 1470 - Maintenance Equipment

LINE 1480 - Motor Vehicles

LINE 1495 – Accumulated Depreciation similar to 165







CURRENT LIABILITIES (311 - 348)



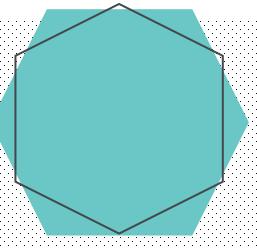
- 311 BANK OVERDRAFT DO NOT USE THIS LINE UNLESS YOU TRULY HAVE AN OVERDRAFT
- 312 ACCOUNTS PAYABLE < 90 DAYS PAYABLES TO CONTRACTORS AND VENDORS INCLUDE EMPLOYEES ALSO (313 IF OVER 90 DAYS)
- 321 ACCRUED WAGES / PAYROLL TAXES
- 322 ACCRUED COMP ASB CURRENT PORTION -GENERALLY SEE 20% TO 30% OF BALANCE HERE. CHANGE IN CA DOES NOT GO TO LINE 96210.
- 325 ACCRUED INTEREST PAYABLE ALL INTEREST PAYABLE (HOWEVER LONG-TERM NOTES)
- 331 AP HUD PHA PROGRAM AMOUNTS DUE TO HUD
- 332 AP PHA PROJECT PORTABILITY HCV DUE TO OTHER HA.

NON- CURRENT LIABILITIES (350 – 357)

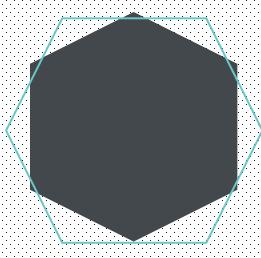
- ❖ 351 LTD CAPITAL CFFP, ENERGY PERFORMANCE CONTRACTS,
 CAPITAL LEASE PAYABLE
- ❖ 352 LTD OPERATING BORROWING FØR OPERATIONS OF AGENCY
- * 353 NC LIABILITIES OTHER CATCH ALL AND INCLUDES FSS ESCROW BALANCES > 12 MONTHS
- ♦ 354 ACCRUED COMP ABS NC EMPLOYEE BENEFITS PLUS TAXES
 (VACATION, SICK, AND COMP TIME) LESS 322
- 357 ACCRUED PENSION AND OPEB ALL LIABILITY NO CURRENT PORTION ON THESE
- 400 DEFERRED INFLOW OF RESOURCES PENSIONS, GRANT
 - O ADVANCES (HCH), SOON-TO-BE LEASES







EQUITY (NET POSITION)





EQUITY (508 - 512)

- 508.4 NET INVESTMENT IN CAPITAL ASSETS REPRESENTS LINES 161-167 FEWER LINES 351 & 344. HUD EDIT FLAG.
 - ➤ 511.4 RESTRICTED NET POSITION RESTRICTED CASH INCLUDING PENSION ASSET LESS SD, FSS ESCROW, AND ANY OTHER LIABILITIES PAID WITH RESTRICTED CASH. HUD EDIT FLAG
 - > 512.4 UNRESTRICTED NET POSITION PLUG THE REST OF THE NET POSITION.





EQUITY MultiFamily Housing



Nonprofit Equity

- 3131 Net Assets Without Donor Restrictions
- 3133 Net Assets With Donor Restrictions

Partnership Equity

- 3300 Partnership Equity
- 3301 Contributions (Equity)
- 3302 Distributions

All Entity Types

3399 – Prior Period Corrections (All Types)





TENANT REVENUE (70300 – 70400)

70300 -

NET TENANT RENTAL REVENUE – TENANT RENTS LESS UTILITY ALLOWANCE PAYMENTS. NO FRAUD RECOVERY

70400 -

TENANT REVENUE OTHER – ALL OTHER TENANT RECEIPTS OTHER THAN RENT AND FRAUD RECOVERY. REPAIRS, LATE FEES, AND OTHER SERVICES.





GRANT REVENUES (70600 - 70800)

- 70600 HUD PHA OPERATING GRANTS -ALL PROGRAMS AND PROJECT HUD RECEIPT EXCEPT FOR CAPITAL FUND CAPITAL PURCHASES.
- 70610 CAPITAL GRANTS ONLY CFP HARD COSTS.
- 70800 OTHER GOVERNMENT GRANTS ANY OTHER GRANTS NOT DIRECTLY
 RECEIVED FROM HUD INCLUDING HUD
 GRANTS RECEIVED FROM STATE OR LOCAL
 AGENCY.







COCC REVENUES (70700 - 70750)

- 70710 MANAGEMENT FEE ALL MANAGEMENT FEES EARNED IN COCC ON FEDERAL PROGRAMS. NON-HUD PROGRAMS AND UNITS SHOULD BE IN LINE 70750. (91300)
- 70720 ASSET MANAGEMENT FEE COCC EARNS FROM PH MANAGEMENT WHICH HAS EXCESS CAHS ONLY (92000)
- □ 70730 BOOK-KEEPING FEE COCC EARNS \$7.50 PER UNIT (91310)
- □ 70740 − FRONT LINE SERVICE FEE − EXAMPLES ARE CENTRALIZED MAINTENANCE AND INSPECTION
- □ 70750 OTHER FEES ANY OTHER FEES COCC OR BA EARNS. MANAGEMENT FEES OF NON-HUD UNITS.







71400 -

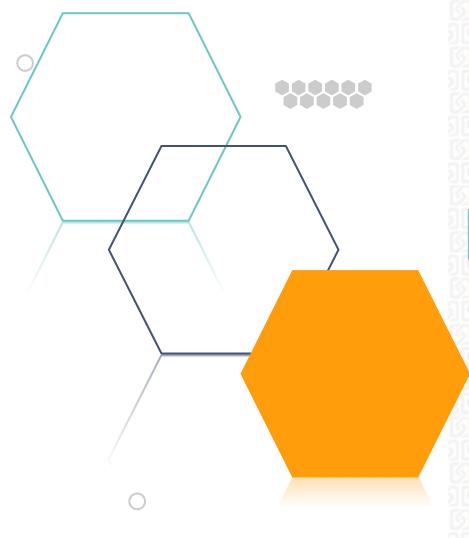
FRAUD RECOVERY – FULL AMOUNT OF ANY FRAUD RECOVERIES EARNED

71500 -

OTHER REVENUE – ALL OTHER REVENUES INCLUDING FSS ESCROW FORFEITURES, PORTABILITY UNDER HCV, AND CAPITAL CONTRIBUTIONS IN LIHTC DEALS

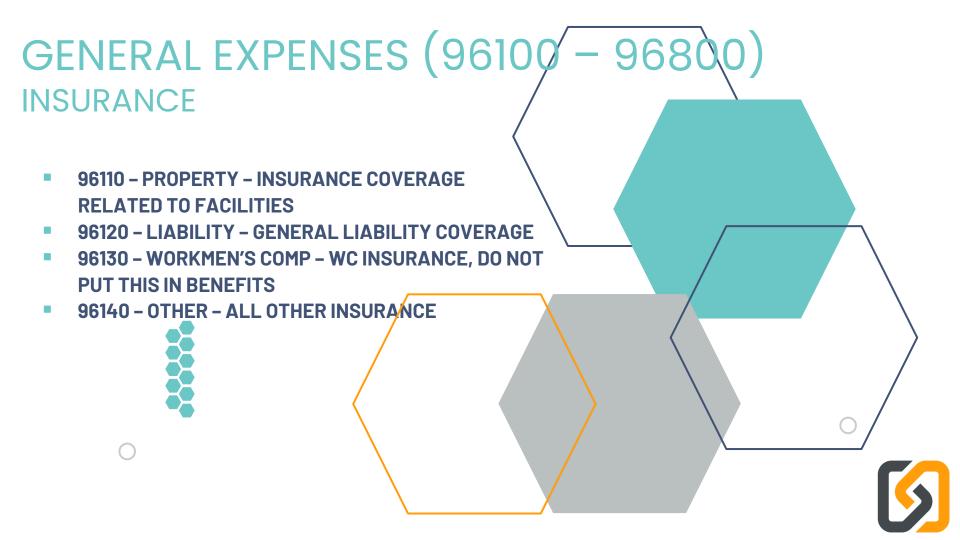








EXPENSES



GENERAL EXPENSES (96100 - 96800) continued

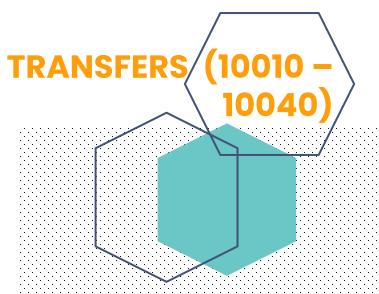
smithmarion

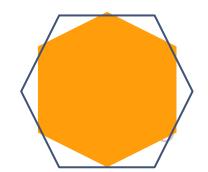
- 96200 OTHER GENERAL CATCH-ALL INCLUDES THINGS LIKE PAYMENTS TO MIXED FINANCE FOR SUBSIDY, ADMIN FEE FOR PORTABILITY, ENERGY SAVINGS ON EPC, FINES, AND PENALTIES.
- 96210 COMP ABSENCE REPRESENTS USED
 VACATION AND SICK DURING THE YEAR. NOT THE CHANGE IN THE LIABILITY.
- 96300 PILOT PILOT OR ANY REAL ESTATE TAXES
- 96400 BAD DEBT TENANT RENT SHOULD NOT BE USING DIRECT WRITE-OFF METHOD.
- 96800 SEVERANCE EXPENSE EMPLOYEE SALARY
 AND UNUSED LEAVE PAYMENTS UPON SEPARATION.





- 100100 / 100200 OPERATING TRANSFERS IN / OUT TRANSFER OF OPERATING RESOURCES FROM ONE FUND TO ANOTHER FUND. NO LOANS OR REIMBURSEMENTS.
- ☐ 10030 OPERATING FROM / TO PG TRANSFERS FROM / TO PG TO OTHER LEGAL ENTITY.
- 10040 OPERATING FROM / TO CU TRANSFERS BETWEEN PG AND COMPONENT UNIT.













ELIMINATIONS DON'T FORGET THESE IMPORTANT ENTRIES!



THANKS!

Do you have any questions? cporter@smco.cpa +19098256600 | www.smcocpa.com









