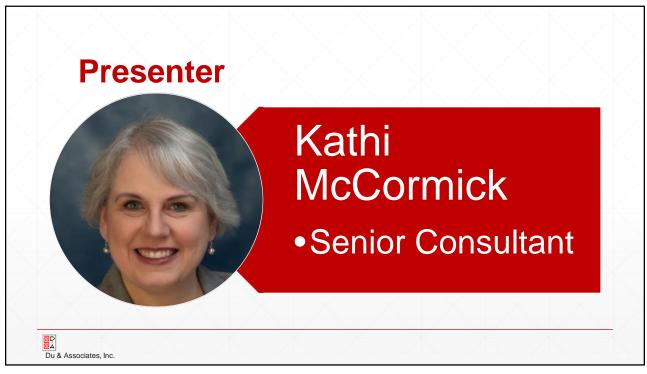


Preparing for a Management & Occupancy Review (MOR)

PBRA

1



Poll #1

- How many in the room have traditional PBRA properties that have never been Public Housing?
- How many have PBRA properties that were converted from Public Housing via RAD?
- How many have both?
- How many have neither?





3

3

Poll #2

- How many in the room have directly participated in the MOR process before?
- How many have indirectly participated in the MOR process before (support or supervisory roles)?
- How many have properties that have not yet had their first MOR?





4

What will I learn during this training?

- What a Management and Occupancy Review (MOR) is;
- How to prepare for an MOR;
- The HUD-9834 Management Review for Multifamily Housing Projects form basics;
- Basics of Project-Based Rental Assistance (PBRA) policies, procedures, and required forms; and
- Common MOR findings to watch out for.





5

5

What will I learn during this training?

- Tenant Rental Assistance Certification System (TRACS) basics;
- Housing Assistance Payment (HAP) Voucher basics;
- Repayment Agreements; and
- What are Special Claims and why you should care.



MOR Background

- Review performed to verify a property's compliance with the HAP contract and applicable Regulatory Agreement(s).
- Review categories as outlined by HUD Handbooks 4350.1 and 4350.3:
 - General Appearance & Security (10%);
 - Follow Up & Monitoring of Physical Inspections (REAC or NSPIRE) (10%);
 - Maintenance & Standard Operating Procedures (10%);
 - Financial Management/Procurement (25%) (RAD ONLY);
 - · Leasing & Occupancy (25%);
 - Tenant/Management Relations (10%); and
 - General Management Practices (10%).
- The weighted Section Scores are used to determine an Overall Rating: Superior, Above Average, Satisfactory, Below Average, or Unsatisfactory (from Highest to Lowest).



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7

Basics - PBRA

- Be Aware of the differences between PH and PBRA requirements:
 - It is important to become familiar with the HUD-9834 form, and specifically the Addendum-A to understand file requirements.
 - Enterprise Income Verification (EIV) is closely monitored as part of the MOR. If compliance is deficient, a 5% penalty on each voucher will be assessed until deficiencies have been rectified.
 - Sustained occupancy rates below 90% can result in a decrease in the number of contract units.
 - When deficiencies are identified and the owner/agent fails to correct the deficiencies, HUD's Departmental Enforcement Center (DEC) can take enforcement action.



Basics - MOR

• Who Conducts the MOR:

- There are currently three different types of reviewers:
 - Traditional Contract Administrators (TCA) are housing authorities or housing finance agencies that have some type of interest in a property with project-based rental assistance (PBRA), such as tax credit monitoring.
 - Performance-based Contract Administrators (PBCA) are housing authorities or housing finance agencies that have won a contract to monitor a designated pool of PBRA properties.
 - HUD monitors any PBRA property that is not monitored by a TCA or PBCA.
- When a TCA-monitored property has a HAP-contract renewal, monitoring transitions to the area's PBCA.
- HUD currently monitors all RAD properties.



9

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Risk-Based MORs

In September of 2022, HUD implemented "Risk-Based MOR" scheduling, which means that the most recent MOR rating after September 26, 2022 (along with a separate HUD-determined Risk Rating) dictates the frequency with which MORs are conducted for a property:

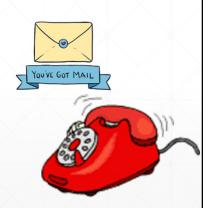


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What to Expect

Before the MOR:

- A scheduling phone call or email at least two weeks before the proposed audit date;
- Written confirmation of the confirmed date approximately two weeks before the audit date;
- A copy of HUD-9834 Addendum C with a list of documents that must be provided to the reviewer in advance of the audit date; and
- A copy of HUD-9834 Addendum D that must be completed and provided to the reviewer in advance of the audit date.





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What to Expect

Day of Review:

- An entrance meeting to briefly discuss the plan for the day;
- A site visit to confirm the correction of REAC (or NSPIRE) findings. This may include the inspection of occupied and vacant units.
- Tenant file review (hint: file sample will almost certainly include households that appear on the property's monthly/quarterly EIV reports);
- EIV report review;
- A discussion (questions/answers) to review sections of the HUD-9834; and
- An exit meeting to discuss the identified findings.



What to Expect

After the MOR:

- Possible follow-up calls or emails from the reviewer requesting additional information;
- A written report approximately 30 days following the date of the audit; and
- Written and substantiated follow-up until all findings are corrected to the reviewer's satisfaction.





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How to Prepare for Your MOR

Start now:

- Obtain training on the HUD-4350.3 handbook;
- Know what is in EIV;
- Know what is in TRACS;
- Know what is on your HAP voucher;
- Become familiar with all aspects of the HUD-9834 form;



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How to Prepare for Your MOR (continued)

- Review and correct your policies and procedures;
- Develop a tenant file checklist and use it (see Addendum A);
- Implement a quality control program and stick to it;
- Review and correct your tenant files; and
- Gather and maintain required documents (Addendum C).



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How to Prepare for Your MOR

We recommend that each property create an MOR Binder. This binder will have placeholders for all documents listed in Addendum C of the HUD-9834. Prior to the MOR date, management will update the binder with current information:

- Any Special HUD Permissions (Preferences, Charges, Special AR Dates, etc.);
- PBRA forms/letters (Application, Rejection Letter, Lease Addendums, etc.);
- Reports (Rent Roll, Wait List, Income Target Log, etc.);
- Policies (Tenant Selection Plan, Pet Policy, Emergency Transfer Plan, etc.); and
- Procedures (Grievance, Work Orders, Inspections, etc.).



How to Prepare for Your MOR

EIV is a primary area of review during a Management and Occupancy Review.

BE READY to produce the following:

- EIV Policy / Procedures;
- EIV Master Binders for all monthly and quarterly reports for the past three (3) years; and
- EIV reports that belong in the tenant files selected.

NOTE: the reviewer will want to confirm that you are doing what your policy / procedures say you will do.



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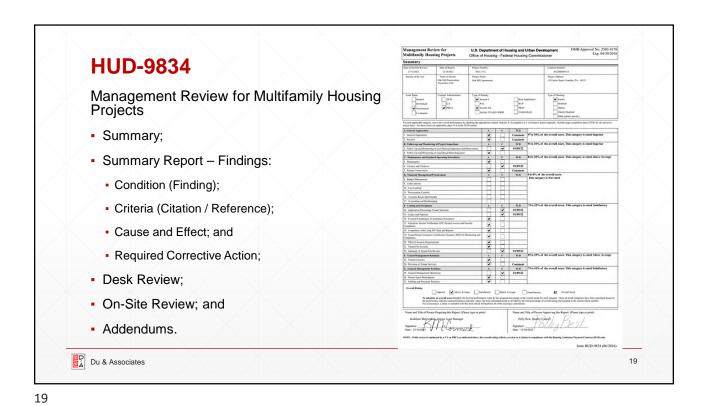
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How to Prepare for Your MOR

EIV User Access Documents – gather these, keep them current, and be able to produce them on demand:

- EIV Coordinator Access Agreement (signed multi-page document);
- EIV Coordinator Owner Approval Letter;
- EIV User Access Agreement (signed multi-page document);
- EIV Coordinator and User CURRENT Access print-outs;
- EIV Rules of Behavior;
- TRACS Rules of Behavior; and
- Cyber Security Awareness Certificates
 (https://www.hud.gov/sites/dfiles/PIH/documents/EIV_Annual_Security_Awareness_T raining.pdf).





Addendum A The Tenant File Review Worksheet is used as a guide to review each tenant file A. HOUSEHOLD INFORMATION

1. Is the application complete, including the date | Yes | No | selected. The findings associated with this form are typically specific to an individual file, rather than the overall use of a form or general r incene? Law incene? application of procedures. General forms and procedures are reviewed separately. Du & Associates 20

Tenant File Review Worksheet - Household Information

- This section of the tenant file review looks at:
 - The Application;
 - The EIV Existing Tenant Search report;
 - Unit size vs. household size;
 - Income Limits at move-in;
 - HUD's Race and Ethnicity form;
 - HUD's 9887/9887-A form; and
 - Required form distribution at move-in or annual recertification.



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Addendum A

Tenant File Review Worksheet - Verification

- This section of the tenant file review looks at the verification of:
 - Social Security Numbers;
 - Dates of birth;
 - Immigration status;
 - Disability status (if applicable);
 - Student status (if applicable); and
 - Screening according to the property's Tenant Selection Plan.





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Tenant File Review Worksheet - Lease

- This section of the tenant file review looks at:
 - Proper use of the Lease;
 - The House Rules;
 - The VAWA Addendum;
 - Proper use of any other addendums, if applicable;
 - The Security Deposit; and
 - Unit Inspections.



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Addendum A

Tenant File Review Worksheet - Certification / Recertification

- This section of the tenant file review looks at:
 - · Recertification notices;
 - · Timeliness of recertifications;
 - Verification and subsequent calculations:
 - Income;
 - · Asset; and
 - Allowance/Expense;
 - Recertification-related EIV reports:
 - Income reports;
 - Income Discrepancy reports; and
 - New Hires reports



Tenant File Review Worksheet - Billing

- This section of the tenant file review looks at:
 - Whether this specific household is billed for correctly on the HAP Voucher; and
 - Any adjustments associated with this household on the HAP Voucher.



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Addendum A

Tenant File Review Worksheet – Move-out File Review

- This section of the tenant file review looks at:
 - The accuracy of the move-out 50059-A certification;
 - The move-out inspection;
 - The security deposit disposition letter;
 - Any refund due to the tenant; and
 - Any additional charges due to the property from the tenant.





Tenant File Review Worksheet - Applicant Rejection File Review

- This section of the tenant file review looks at:
 - The rejection notice sent to the Applicant;
 - The reason for rejection compared to the property's Tenant Selection Plan; and
 - The appeal, if applicable.





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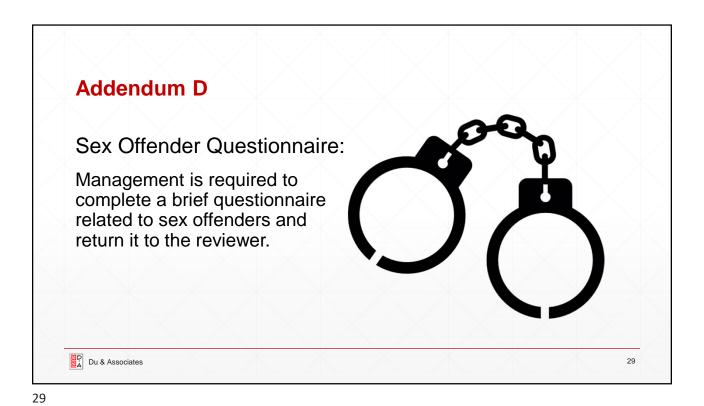
Addendum C

List of documents property must provide to the reviewer, usually in advance of the review date:

- Policies and procedures related to all aspects of management;
- Specific required forms in use at the property;
- Property reports, such as the waiting list, rent roll, and financial reports; and
- HUD approval letters for preferences, maintenance charges, or any property-specific exceptions.



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Category A: General Appearance

This section looks at:

- Property curb appeal;
- Appearance-related REAC (or NSPIRE) findings;
- Condition of Common Areas;
- Signage; and
- Security.





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Category A: General Appearance

- Trash, graffiti, or damage visible in common areas or the exterior;
- Damaged or inadequate signage; or
- Security concerns.





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Category B: Follow-up and Monitoring of Project Inspections

This section looks at:

- The most recent REAC (or NSPIRE) report;
- Whether the findings on that report have been corrected; and
- The property's compliance with lead-based paint requirements.



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Category B: Project Inspections

Site inspection identifies open REAC (or NSPIRE) findings. Each open finding has the potential to result in points deducted from the category B score, thereby impacting the overall score.





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Category C: Maintenance and Standard Operating Procedures

This section looks at:

- Work order procedures, completion times, and the number and age of open work orders;
- The property's inventory system;
- Inspection procedures;
- Energy Conservation efforts;
- Preventive Maintenance schedule; and
- Vacancy rates and turn times.







Category C: Maintenance

- Average total vacancy time exceeds 30 days;
- Average vacancy prep time exceeds 15 days;
- Occupancy rate below 90%; and
- Backlog of work orders.





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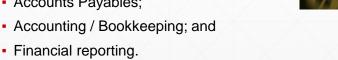
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Category D: Financial Management / Procurement

This category is specific to PBRA properties that are **monitored by HUD** and not a Contract Administrator.

This section looks at:

- Budget management;
- Cash controls;
- Procurement procedures;
- Accounts Receivables;
- Accounts Payables;





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Common Findings (properties monitored by HUD only)

Category D:

Finance/Procurement

- Combined Financials (not property/contract specific);
- Receivables exceed 10% of the monthly gross rent potential;
- Payables are excessive when compared to the monthly gross rent potential;
- Bank or Petty Cash reconciliations are not done timely;
- Management is unable to provide requested reports;



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Common Findings

Category D:

Finance/Procurement (continued)

- Bad Debts;
- Receivables on the ledger don't match the financial statements;
- Audited financials statements are not submitted timely;
- Reserve account is inadequate to meet future needs;
- Operating expenses are too high; and
- Lack of separation of duties.



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Category E: Leasing and Occupancy

This section looks at:

- Application processing / Tenant Selection;
- Leasing / Deposits;
- Terminations (Tenancy and Subsidy);
- EIV System use;
- TRACS use and monitoring;
- Tenant file security; and
- Tenant file compliance.





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Common Findings

Category E: Leasing and Occupancy

Tenant Files:

- Missing or unsigned tenant file documents;
- Rent / subsidy calculation errors;
- Inadequate verifications;
- EIV Existing Tenant Search is missing or not documented;
- Lease / VAWA Addendum are not completed correctly; and
- Security deposit collected, in paragraph 8 of the lease, or on the 50059 are incorrect.



Category E (continued)

Tenant Selection Plan:

- Missing or incorrect Social Security Number requirements for applicants;
- Missing, outdated, or inadequate VAWA provisions;
- Missing or incorrect student rules;
- Incorrect or inadequate Preference information; and
- Missing or incorrect screening criteria.

A full description of TSP requirements can be found in HUD 4350.3, Chapter 4.



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Common Findings

Category E (continued)

Affirmative Fair Housing Marketing Plan:

- The HUD-approved Affirmative Fair Housing Marketing Plan (AFHMP) is not available for the reviewer or is not on display at the property office; or
- The previously approved plan has not been reviewed (and updated if necessary) within the last five years. The reviewer will request evidence that the plan has been reviewed within the last five years.





Category E (continued)

Application:

The property's application does not include:

- The date and time the application was received;
- Questions that enable management to do the following:
 - Determine which waitlist a household should be placed on;
 - Determine preliminary income level;
 - Determine if the household is eligible for preferences; and
 - · Identify specific screening needs.



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Common Findings

Category E (continued)

Waiting List:

The property-specific waiting list does not include:

- Applicant's name;
- Date and time of application;
- Unit size;
- Preferences;
- · Income Level; and
- · Need for an accessible unit.



Category E (continued)

House Rules:

- Unreasonable rules;
- Rules not related to the safety, care, and cleanliness of the building or the safety and comfort of the tenants;
- Missing, outdated, or inadequate VAWA protections; and
- Rules that are not consistent with HUD rules and regulations as described in HUD 4350.3, Chapter 6.



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Category F: Tenant/Management Relations

This section looks at:

- Grievance procedures;
- Tenant complaints/concerns;
- Tenant services;
- Service Coordinators; and
- Neighborhood Network Centers.





Category F:

Tenant/Management Relations

- This category typically only results in findings if management is not responsive to tenant complaints.
- Complaints made to HUD or other reporting entities must be resolved in a timely manner.



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Category G: General Management Practices

This section looks at:

- Management practices;
- Staff qualifications and training;
- Management's monitoring of on-site operations;
- Procedures for implementation of HUD requirements; and
- Required postings.





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Category G:

General Management Practices

- This section's findings are directly tied to findings in other sections, when:
 - Staff does not have adequate training to meet the needs of the property or carry out the owner's/agent's obligations under the HAP contract; or
 - Management has not implemented corrective actions from previous MORs.



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Score Calculation - Categories

Each category has a score. Each score range has an assigned point value. The ratings are:

- Superior, which is worth 90-100 points (Very few errors, no major adverse findings, highly effective policies and procedures; no EH&S deficiencies);
- Above Average, 80-89 points (Few errors, no major adverse findings, effective policies and procedures; no EH&S deficiencies but minor deficiencies may be present);
- Satisfactory, 70-79 points (Errors are present, policies and procedures are not always adequate; EH&S deficiencies may be present);
- Below Average, 60-69 points (Numerous errors, repeat major adverse findings, policies and procedures are ineffective; EH&S deficiencies are present); and
- Unsatisfactory, 59 points or less (Numerous serious errors, repeat major adverse findings, possible open findings from previous reviews, policies and procedures are not in compliance with HUD requirements; many EH&S deficiencies are present).



Score Calculation - Overall

Example of overall score calculation for RAD MOR:

	Rating	Point Value	Percentage of Overall Rating	Calculated Points
General Appearance / Security	Above Average	82	10%	8.2
Follow-up / Monitoring of Inspections	Superior	96	10%	9.6
Maintenance / SOPs	Above Average	84	10%	8.4
Financial Management / Procurement	Satisfactory	75	25%	18.75
Leasing / Occupancy	Satisfactory	77	25%	19.25
Tenant / Management Relations	Above Average	84	10%	8.4
General Management	Satisfactory	76	10%	7.6
Totals			100%	80.2
Overall Rating	Above Average			80

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Score Calculation - Overall

Example of overall score calculation for traditional PBRA MOR:

	Rating	Point Value	Percentage of Overall Rating	Calculated Points
General Appearance / Security	Above Average	82	10%	8.2
Follow-up / Monitoring of Inspections	Superior	96	10%	9.6
Maintenance / SOPs	Above Average	84	10%	8.4
Financial Management / Procurement	Satisfactory	0	0%	0
Leasing / Occupancy	Satisfactory	77	25%	19.25
Tenant / Management Relations	Above Average	84	10%	8.4
General Management	Satisfactory	76	10%	7.6
Totals			75%	61.45
Overall Rating	Above Average			82

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HUD Monitoring - HOTMA

Prior to January 1, 2025:

 Prior to January 1, 2025, PHAs/MFH Owners will not be penalized for HOTMA-related tenant file errors during HUD reviews, including Management and Occupancy Reviews (MORs). Instead, the reviewer will issue observations with corrective actions.

After January 1, 2025:

- Full compliance with the HOTMA final rule is mandatory effective January 1, 2025. HUD will monitor owner compliance on or after January 1, 2025:
 - HUD and Contractor Administrators will issue HOTMA-related findings during reviews.
 - PHAs/MFH Owners must correct all HOTMA-related observations that were issued during 2024.
 - PHAs/MFH Owners who fail to implement HOTMA may be found in default of their business agreements with HUD.



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Knowledge Check

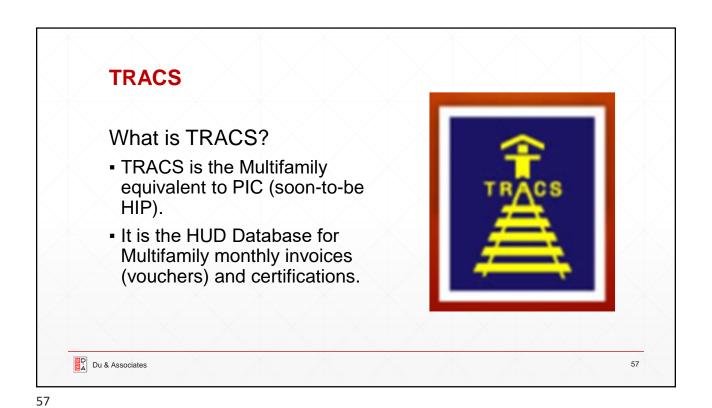
- 1. Which sections of the MOR have the greatest impact on your score?
- 2. Which areas reviewed have the greatest impact on residents?
- True or False: Category D only applies to MORs conducted by HUD.
- 4. What type of finding can temporarily result in a reduction to your Housing Assistance Payment?
- 5. When should you start to prepare for your first/next MOR?

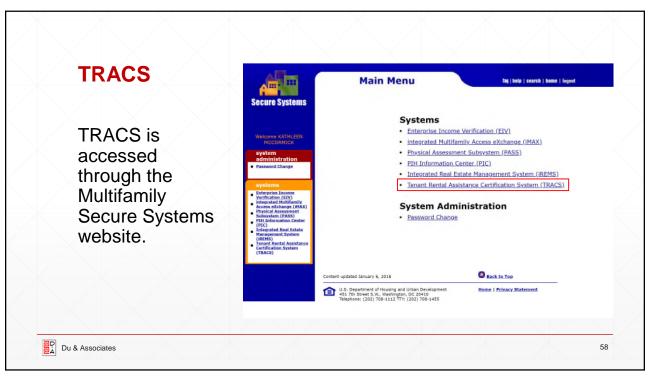












TRACS

- TRACS Current Version is 2.0.2.D.
- TRACS version that will implement HOTMA changes will be 203.A (coming soon).
- A TRACS File is referred to as a Monthly Activity Transmission (MAT) file.
- There are numerous types of MAT files.
- The MAT User Guide can be found at https://www.hud.gov/sites/dfiles/Housing/documents/202 D_MAT_GUIDE.ZIP.
- Look for an updated MAT Guide when TRACS 203.A is released.



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TRACS

Who should have access to the property's TRACS Information?

- Staff responsible for submitting the property's voucher (monthly invoice)
- Staff responsible for submitting tenant certifications
- This may be the same person or persons



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TRACS

Why do we look at TRACS?

- To confirm that each certification submitted has been received by TRACS;
- To confirm that each voucher submitted has been received by TRACS; and
- To determine when vouchers will be paid (approximately).

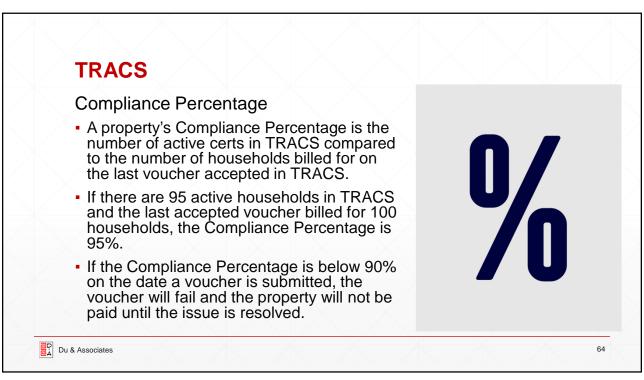


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TRACS

Compliance Percentage (continued)

Why would a Compliance Percentage fall below 90%?

- Certifications submitted to TRACS contain a fatal error.
 Example: move-in certifications are rejected due to errors.
- When annual recertifications are not submitted within 15 months of the move-in, initial, or last annual certification, HUD will automatically terminate subsidy.



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TRACS

Reconcile Compliance Percentage

- Compare the active certifications in TRACS to the last accepted voucher.
- Identify households that are missing from TRACS but are on the voucher.
- Import and review TRACS errors. Your software should be able to import the errors.
- Resolve certification discrepancies causing the errors and resubmit the certification to TRACS.



TRACS

Compliance Percentage

As of today's date, there is no maximum Compliance Percentage. This means that you could have 105 active households in TRACS, but only bill for 100 households on your voucher. This would result in a Compliance Percentage of 105%.

- There is currently no penalty for this, but HUD has the right to implement one in the future.
- This occurs when move-outs or terminations contain errors and are rejected by TRACS.



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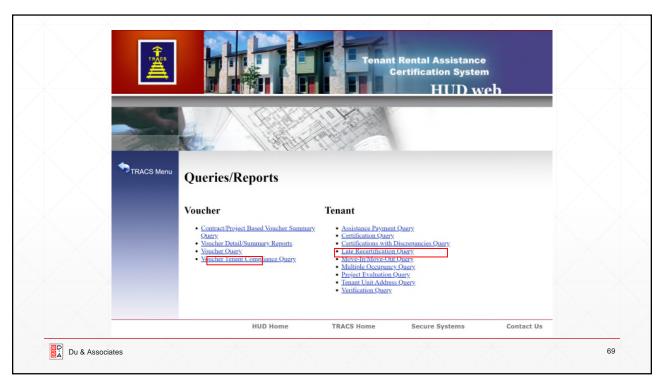
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TRACS

TRACS Queries that you may find useful:

- Voucher shows the status of each voucher submitted to TRACS;
- Certification shows each household in TRACS, the unit, subsidy, contract rent, and active status;
- Late Recertification self-explanatory;
- Move-in/Move-out shows all move-ins and move-outs within a specified time frame;
- Multiple Occupancy shows units occupied by multiple households, OR households occupying multiple units; and
- Verification shows unit and household sizes, which can be used to help identify over/under-housed families.





HAP Voucher

The HAP Voucher is the Project-Based Section 8 property's invoice to HUD for:

- Regular Assistance Payments;
- · Special Claims;
- Miscellaneous Accounting Requests;
- Repayment Agreements; and
- Other miscellaneous payments to HUD.



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HAP Voucher Deadline for Voucher **Timely** Month Submission HAP Vouchers are 01/01/24 12/10/23 submitted to HUD 02/01/24 01/10/24 03/01/24 02/10/24 electronically a month in 04/01/24 03/10/24 advance, between the 1st 05/01/24 04/10/24 and 10th of the month. For 06/01/24 05/10/24 07/01/24 06/10/24 example, the 02/2024 08/01/24 07/10/24 voucher must be submitted 09/01/24 08/10/24 between 01/01/2024 and 10/01/24 09/10/24 11/01/24 10/10/24 01/10/2024. 12/01/24 11/10/24 Du & Associates 71

HAP Voucher

The basic HAP Voucher
Consists of several parts:

- HUD-52670 is the summary of the monthly invoice

- HUD-52670-A Part 1 is the detail for the current month's Regular Assistance Payments for the property

- HUD-52670-A Part 3 is the detail for adjustments made to the voucher to correct payments due to retroactive certifications

- HUD-52670-A Part 3 is the detail for adjustments made to the voucher to correct payments due to retroactive certifications

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Visite and the second						Housing C									
Before completing this form, read and for		n the Mon	thly Activity	Transmission											
Asst. Pymts Due For (mm/yy): 02/2022	Project Name: Deart Apa Court Apa	-tt-				3. FHS/EH/N	ion-Insure	d Proj.No:	4. Se	ection 8/PAC/PR/	AC Contract N	1: Se	e of Subsidy		
02/2022	Court Apa	runems					1 Turni	over Data	Recertifie	cation Data		Tenant Assista			
6. Head of Household Name	7. Unit Number	8. Unit	9. Contract	10. Util.	11. Gross	12. Income			14a.	14b. First	15. Change	16a.	16b.		
Last, First, Initial		Size	Rent	Allow.	Rent	Code	13a. Code	13b. Mo./Day	Effective Date	Reminder Notice Date	Code	Requested	(HUD/CA use only)		
WILLIAMS,	1113	2	828.00	.00	828.00		-		7/1/2022	0.0.0		602.00	0,0000		
DAYE, C	1114	2	828.00	.00	828.00				12/1/2021			775.00	0.0000		
JACKSON, D	1115	2	828.00	.00	828.00				11/1/2022			263.00	0.0000		
KEYS,	1116	2	828.00	.00	828.00				7/1/2022			571.00	0.0000		
JOHNSON,	1117	2	828.00	.00	828.00				11/1/2022			585.00	0.0000		
ELLIS,	1118	2	828.00	.00	828.00				12/1/2022			747.00	0.0000		
CHAPPELL,	1119	2	828.00	.00	828.00		1		12/1/2022			304.00	0.0000		
COMPTON.	1120	2	828.00	.00	828.00				12/1/2021			803.00	0,0000		
WEARING,	1121	2	828.00	.00	828.00				12/1/2021			506.00	0.0000		
GREEN, K	1122	2	828.00	.00	828.00				12/1/2021			735.00	0.0000		
ROCHELLE, D	1123	2	828.00	.00	828.00				12/1/2021			594.00	0.0000		
DANIELS, W	1124	2	828.00	.00	828.00				12/1/2021			603.00	0.0000		
LENNON, M	1125	2	828.00	.00	828.00				12/1/2022			461.00	0.0000		
JOHNSON, N	1126	2	828.00	.00	828.00				7/1/2022			343.00	0.0000		
WALKER,	1127	2	828.00	.00	828.00				12/1/2021			100.00	0.0000		
PARRISH, N	1128	2	828.00	.00	828.00				12/1/2022			803.00	0.0000		
CLEMONS, S	1129	2	828.00	.00	828.00				12/1/2022			803.00	0.0000		
PETTIFORD, M	1131	2	828.00	.00	828.00				9/1/2022			803.00	0.0000		
WALTERS,	1132	2	828,00	.00	828.00				10/1/2022			803.00	0.0000		
BRAILEY, L	1133	2	828.00		828.00				12/1/2022		AR	505.00			
BAEZ, M	1136	2	828.00	1 1	828.00				12/1/2021			687.00	20121		
BERGERON, D	1137	2	828.00		828.00				1/1/2022			368.00	0.0000		
JAMES, J	1138	2	828.00		828.00				12/1/2022			500.00	0.0000		
WINSTON, N	1139	2	828.00	1/1	828.00				12/1/2022			614.00	0.0000		
LAWSON, S	1140	2	828.00	.00	828.00				12/1/2021			787.00	0.0000		
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Before completing this form. 1. Asst. Pymts Due For (mm/)		he instruction		he Month	ly Activity Tr	ransmissi	on (MAT) Us					HUD-526			public burd	cn. 5. Type of Su	bsidy:
02/2022				Apartme	ents						NC					1: Sec 8	
6.	7.	Adjusting Certification				9. Adjustment Period			10.	Calculation							
Head of Household Name Last, First, Initial		Prior or	New	Cert	Effective	Asst. Pmt.	Beginning Date	Ending Date	Beginning Partial Month		Full I	Months	Ending Partial Month			11 a. Requested	11 b. Approved (HUD/CA
		New Billing?	Cert ?	Туре	pe Date				No. of Days	Daily Rate	No. of Months	Monthly Rate	No. of Days	Daily Rate	Amount		use only)
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HAP Voucher

Additional parts of the HAP Voucher:

- HUD-52670-A Part 4 is for Miscellaneous Accounting Requests
- HUD-52670-A Parts 2 and 5 are for Special Claims;
 and
- HUD-52670-A Part 6 is for Repayment Agreements.



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HAP Voucher

Find more information about Vouchers / TRACS:

- 2.0.2.D Monthly Activity Transmission (MAT) User Guide https://www.hud.gov/sites/dfiles/Housing/documents/202D_MAT_GUIDE.ZIP
- Look for an updated MAT Guide when TRACS 203.A is released.
- Sample HUD 52670 and 52670-A forms, along with instruction documents
 - https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a



Repayment Agreements

PBRA subsidy is paid in advance based on the information provided by the owner/agent. The owner/agent determines subsidy from information on verifications received during the certification process. If a tenant fails to report information in a timely manner, the tenant may be required to repay subsidy that the owner/agent received in error.

Repayment Agreements give tenants the ability to repay subsidy that they were unentitled to over time in monthly increments. When the tenant repays subsidy, the owner/agent must forward the repayment to HUD. This is accomplished via Part 6 of the HAP Voucher.

When the owner/agent collects subsidy from a tenant via Repayment Agreement, HUD shows their appreciation by allowing the owner/agent to retain the lesser of the expenses associated with collecting the overpaid subsidy or 20% of the payment.



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Special Claims

HUD provides Special Claims as a method for owners of Project-Based Section 8 properties to recoup costs associated with unit turnover.

There are several types of Special Claims. The types that apply to most occupied Project-Based Section 8 properties are:

- Vacancies after rent-up; and
- Unpaid rent and/or damages.



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Special Claims (continued)

Basic special claims process:

- Gather required supporting documents;
- Generate required HUD forms;
- All claims forms and supporting documents must be received by HUD within 180 calendar days from the date the unit becomes ready to be re-rented;
- Include approved claims on the property's HAP voucher within 90 calendar days of the approval date; and
- Appeal any denied or reduced claim within 30 calendar days from the date of denial/reduction.



Special Claims (continued)	Special Claims Schedule	Project foatre	and Urban De Office of Housing Federal Housing			Section 8 / PAG / PRIAC	(Exp. 06/30/2016) Convect No.	
	Follow guidelines in HUD Handbook 4350.3, Rev. 1 Chapter 9	XXXXX COURT	APARTMENTS	1234	5678	NC19RE	XXX000	
(continued)				Type a	nd Amount of C	aim (\$)		
(continued)	Head of Household Name Last, First, Initial	Unit Number	Unpaid Rent from HUD 52671-A	Tenant Damages from HUD 52671-A	Rent-Up Vacancies from HUD 52671-B	Vacancies from	Debt Service from HUD 52671-D	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	
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	A CONTRACTOR OF THE PROPERTY O	Tota		1,072		2,669		
	I certify: (a) the above amounts have been and requirements prescribed by HUD and the	applicable Section 8 /	PAC / PRAC					
	Contract; (b) all prerequisites to and condition	s for the assistance cla	imed have been	Claim app				
	met, and (c) all required documentation will be	e retained in the project	s nes tor 3 years.	Claim adj				
				Claim der				
	Owner's printed name, signature, date and p	hone no.		Official's name,	signature, and date			
	Kondomise 111							
	XXXXX COURT APARTMENTS		202-555-1234					
	HUD will prosecute false claims and stateme	nts. Conviction may res	ult in criminal and/o					
	civil penalties (18 U.S.C. Sections 1001, 101	3, 1012, 31 U.S.C. Sect	ions 3729, 3802).					
	Resident construction of solid					from MIID Egens	A Part 2 (05/2014)	
	Previous versions obsolete						HB 4350.3 Rev. 1	
								/
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Special Claims (continued)

A special claim for **vacancy loss after rent-up** allows the owner/agent to recoup a portion of the loss of rental income of a unit that was previously occupied by an assisted tenant but has been vacant for circumstances beyond the owner's/agent's control.

Owners/agents can only collect Vacancy Loss Claims once the unit is restored to decent, safe, and sanitary condition. Vacancy claims do not apply to periods of time when the unit is being prepared for re-occupancy.

The amount the owner/agent may be eligible to collect is based on 80% of the HUD-approved contract rent and may not exceed 60 calendar days. The eligible period begins on the date that the unit is ready for occupancy and ends on the earlier of the date before the lease-up date, or 60 days.

The owner/agent must demonstrate through submission of supporting documents that it has made all reasonable efforts to fill the vacancy. The owner/agent will use a HUD-provided checklist (Special Claims Processing Guide Appendix 3B) to submit required information.

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Special Claims (continued) Fer A special services (continued) For A special services (continued) (continued) (continued) For A special services (continued) (continue	Special Claims	instructions	Project name		Federal Housing Con	FHA project no. 12345678		Sec BPACPRAIG COM # NC19RD00XXX	
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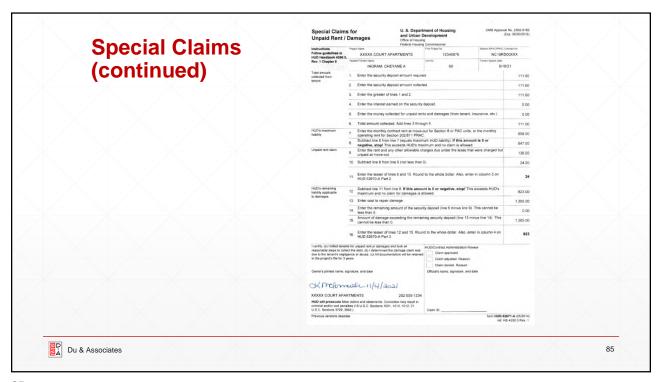
Special Claims (continued)

A special claim for **unpaid rent and/or damages** allows the owner/agent to recoup charges associated with a previous tenant's failure to pay for rent due during occupancy, or for damages beyond normal wear and tear to the unit. These are defined as damages due to abuse or neglect by the tenant.

The maximum amount that HUD will pay for combined unpaid rent and tenant-caused damages is the contract rent amount at move-out less the greater of either the security deposit due from the tenant or the security deposit collected from the tenant. If the contract rent at move-out is \$958 and management correctly collected a security deposit of \$111 from the tenant at move-in, the maximum HUD will pay for a combined claim is \$847 (\$958 - \$111 = \$847).

The owner/agent must demonstrate through submission of supporting documents that it has made all reasonable efforts to collect the balance due from the previous tenant. The owner/agent will use a HUD-provided checklist (Special Claims Processing Guide Appendix 5B) to submit required information.

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Special Claims (continued)

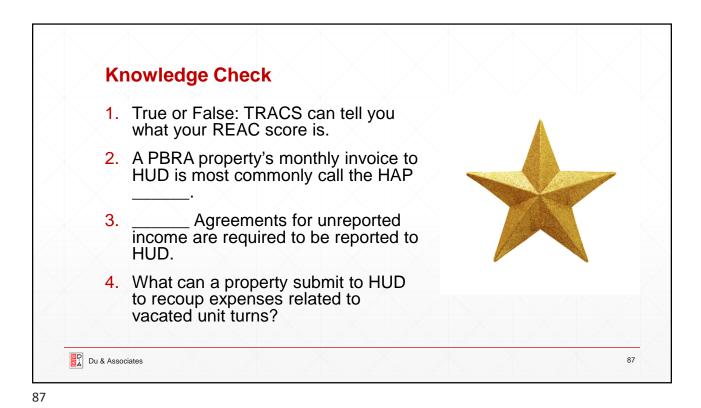
Once a special claim is approved by HUD:

- The owner/agent must submit HUD-52670-A Part 2 with the property's monthly HAP Voucher; and
- Keep all documentation related to your approved claim for three (3) years from the date of payment.

Find more information about Special Claims:

- HUD Special Claims Processing Guide https://www.hud.gov/sites/documents/HSG-06-01GHBGUID.PDF
- HUD Special Claims Processing Guide FAQs https://www.hud.gov/sites/documents/DOC_14970.PDF





Questions?

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