

## The CA Quarterly Review

Summer

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## From the Desk of LeeAnn Farner

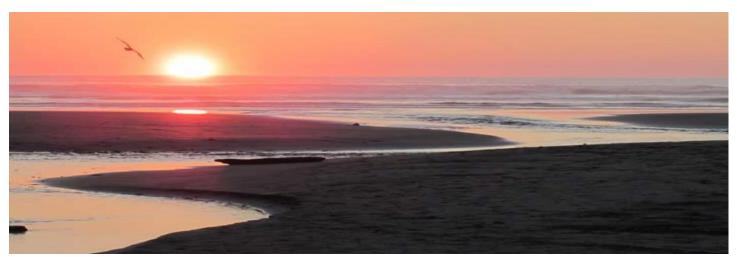
### **Contract Administrator for Northern California**

t's hard to believe that summer is already here and we are all still in the midst of he pandemic due to COVID-19. It has been a very unique and humbling experience to figure out new ways of managing work while maintaining a sense of accomplishment. Last month, CAHI was given the green light to resume MORs, out with some restrictions such as not going inside any occupied units to confirm hat REAC issues have been repaired. CAHI staff is fully prepared to work with each property to schedule and complete the MOR using best practices such as social distancing and PPEs.

Please let CAHI know if there are any confirmed Coronavirus cases at your property as we are required to notify HUD. This includes both residents and staff. If there is a positive test result onsite and the property is scheduled for an MOR, we will be glad to reschedule to a later date. Our goal is to make sure that everyone stays as healthy and safe as possible.

On a personal note, I would like to announce my retirement from CAHI at the end of August 2020. I have spent the past 30 years working in the affordable housing industry including public housing, tenant-based Section 8 and PBCA. It has been an amazing career! I would also like to take this opportunity to thank each of you for the support and wonderful working relationships established over the years. CAHI is left in good hands as there are many incredible staff dedicated to affordable housing including Charles Young, State Manager, who can be reached at <u>charles.voung@cgifederal.com</u> should any assistance be needed.

#### LeeAnn Farner Contract Administrator for Northern California



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### **COVID-19** Information

#### HUD Multifamily Resources: COVID-19

HUD has been updating and providing Multifamily Housing COVID-19 related guidance during the pandemic as a resource to the impacted industry partners. This article only highlights a portion of the disseminated information, and is not meant to be all encompassing guidance. Owners and management agents are encouraged to reference the <u>HUD Multifamily Housing</u> website for complete guidance related to the pandemic.

#### **COVID-19 Guidance for Residents**

HUD has posted a brochure, <u>Addressing Tenant Concerns During the COVID-19 National Emergency</u>, which owner/agents may find beneficial to have available for residents as it provides helpful information on rent requirements, suspension of evictions solely for the non-payment of rent, as well as Contract Administrator resident contact numbers.

#### **COVID-19 Guidance for Owner/Agents**

HUD has posted the <u>Promoting Housing Stability During the COVID-19 National Emergency</u> brochure. It provides helpful information for Multifamily Property Owners and Management Agents on the eviction moratorium details and resources that are available to assist impacted residents.

#### Multifamily Q&A for COVID-19

Additionally HUD has been maintaining an FAQ document related to the COVID 19 pandemic as it relates to the impact on Multifamily Housing. The highlighted questions below represent only a small portion of the updated FAQ guidance that has been disseminated, and is a continuation of an article we posted last quarter in the Spring 2020 Newsletter. Owners and management agent staff are encouraged to periodically check the HUD FAQ link directly to determine if there have been any updates.

#### General Multifamily Housing

Q.5: How should a HUD-assisted property owner/agent message to residents, staff, volunteers, and visitors when there is a positive COVID-19 case among their community?

A.5: Residents are not required to notify administrators if they have or may have a positive case of COVID-19. However, if you do receive information of a positive case, in coordination with <u>Local health officials</u>, communicate the possible COVID-19 exposure to all residents and workers, volunteers, and visitors. This can be done by placing signage in common areas and entrances/exits and by letter to all residents, delivered to their doors. Messages should attempt to counter potential <u>stigma and discrimination</u>. Residents could be advised to inform their recent personal visitors of potential exposure. Owners and agents must maintain confidentiality as required by the Americans with Disabilities Act (ADA) and the Privacy Act. Owners and agents may provide notification of positive COVID-19 cases, but they must ensure the notification does not disclose any names, apartment numbers, and other personally identifiable information to residents, workers, volunteers, and visitors. Owners and agents should also consult local and state health and privacy laws before making any disclosure. CDC COVID-19 <u>printable materials</u> for community-based settings are available on the CDC website.



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## **COVID-19 Information (continued)**

Q.14: What resources are available to address food insecurity concerns for residents of HUD -assisted Multifamily properties during the National Emergency?

A.14: HUD encourages tenants, property owners and agents to explore all local, state, and federal resources to assist residents with access to food, especially vulnerable residents living in HUD assisted housing. A list of potential sources can be found on the HUDExchange at <a href="https://www.hudexchange.info/resource/6026/food-resources-for-residents-of-multifamily-properties/">https://www.hudexchange.info/resource/6026/food-resources-for-residents-of-multifamily-properties/</a>. A key resource to connect older adults and their caregivers to meals and other community-based services is the U.S. Administration on Aging's Eldercare Locator at 800-677- 1116 or eldercare.acl.gov. In addition, the Eldercare Locator can help people with disabilities find their local Aging and Disability Resource Center. People with disabilities can also locate their local Center for Independent Living at <a href="https://www.ilru.org/projects/cil-net/cil-center-and-association-directory">https://www.ilru.org/projects/cil-net/cil-center-and-association-directory</a>. Households who recently experienced a loss of income or who have a very low income can check with their state human services agency about food benefits under the USDA Food and Nutrition Service's Supplemental Nutrition Assistance Program (SNAP). Households with children who previously received free or reduced-cost school meals should contact their school, school district, or state education department about food benefits for children. HUD also has a site where households can find nearby food pantries based on their location: <a href="https://www.hud.gov/findshelter/foodpantries">https://www.hud.gov/findshelter/foodpantries</a>.

Q.15: Are internet services an allowable expense for properties receiving HUD project-based rental assistance?

A. 15: HUD encourages property owners and agents to make their properties internet-ready, including through participation in the <u>Neighborhood Networks Program</u>. Similar to telephone service, broadband or internet fees for individual units may not be included in tenant rent charges or utility allowances for properties receiving project-based rental assistance; however, low-income tenants may be eligible for low-cost internet services. Interested owners and tenants should contact local internet service providers or visit <u>https://connecthomeusa.org/</u> for more information.

#### CARES Act and Additional Resources Available for Response

Q.5: Are household stimulus payment under the CARES Act reportable as tenant income?

A.5: The Economic Impact Payment (which is technically an advance payment of a tax credit that may be claimed on a 2020 tax return) and the temporary weekly federal enhancement to unemployment insurance provided by the CARES Act are not to be included in calculations of income. However, HUD notes that regular payments of unemployment insurance (issued by the state) are treated as income, as is customary under program rules



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## **COVID-19 Information (continued)**

Q.15: Does the ban on evictions apply to all tenants or only those tenants whose employment has been affected by the COVID-19 National Emergency? For example, what if an owner or agent has tenants on a fixed income who are choosing not to pay rent based on the recent announcement?

A.15: Effective March 27, 2020, the CARES Act requires that property owners cease starting new actions against tenants of covered dwellings for 120 days on both FHA-insured Multifamily properties and Multifamily-assisted properties. Further, they must waive late payment fees and charges during this time for nonpayment of rent. Therefore, the temporary moratorium on evictions for nonpayment of rent, as well as a moratorium on charging fees and penalties related to nonpayment of rent apply regardless if employment was directly or indirectly linked to COVID-19.

Q.16: With the eviction moratorium, should owners and agents still send late notices to residents, or should they wait until the 120-day moratorium is over?

A.16: The CARES Act does not prohibit a reminder notice of the late rent being sent by owners or agents. The reminder notice cannot be a notice to vacate. The reminder notice must not include fees/charges/ penalties for the nonpayment of rent.

Q.17: Can an owner or agent still evict a perpetrator of domestic violence or criminal activity, or for other lease violations?

A.17: Yes. The eviction moratorium found in Section 4024(b) of the CARES Act only applies to evictions related to non-payment of rent or non-payment of other charges. The moratorium also prohibits the charging of other fees, penalties, or other charges due to the non-payment of rent. Protections under the Violence Against Women Reauthorization Act of 2013 (P.L. 113-4) remain in effect, and owners/agents should consult <u>Housing Notice 2017-05</u> for more information about the housing rights of victims of domestic violence, dating violence, sexual assault, and stalking under VAWA

#### Asset Management

Q.5: An Owner's Rent Comparability Study (RCS) has triggered the need for a HUD third-party RCS. How will this be addressed?

A.5: Performance Based Contract Administrators (PBCA) and HUD staff will continue to review owners' previously submitted RCSs pursuant to guidance in Chapter 9 of the <u>Section 8 Renewal Guide</u>. If field staff is unable to procure third-party RCSs due to the COVID-19 pandemic, HUD will develop an alternative mechanism to respond to the owners' RCS submissions.





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### **COVID-19 Information (continued)**

Q.7: A Section 8 HAP owner/agent's Fifth year rent adjustment is coming up, at which time the property's rents would be adjusted up or down to align with the Rent Comparability Study (RCS) market rents. How should these rents be processed if the RCS cannot be obtained?

A.7: Under Option One, Option Two, and Option Five contained in HUD's <u>Section 8 Renewal Policy</u> <u>Guidebook</u>, if the contract is for a period greater than five years, the owner must submit a new RCS at the end of each five-year life cycle of the RCS. Rents for the next five years will be adjusted based on the approved RCS.

During the COVID-19 pandemic, HUD will continue to pay the current rent amounts after the fifth-year anniversary date. Owners will be required to obtain and submit RCSs as soon as emergency conditions allow. New rent amounts based on the approved RCS, with any adjustments by HUD, will be made retroactive to the fifth-year anniversary date.

Owners and Agents are welcome to contact the PBCA Call Center at 1-800-982-5221 (English TTY: 1-800-735-2929, Spanish TTY: 1-800-855-300) or <u>pbcacontactcenter@cgifederal.com</u> with questions or concerns.

#### Income Exclusion - Temporary Employment from the U.S. Census Bureau

On June 5, 2020, HUD issued <u>Notice H 20-06</u>, Exclusion from Annual Income of Temporary Employment from the U.S. Census Bureau, which provided instruction regarding exclusion of temporary income received from annual income, by residents, from the U.S. Census Bureau.

Every ten years in the United States, the constitution calls for an actual enumeration of the people, which is used for the appointment of seats in the House of Representatives among the states. The U.S. Census Bureau hires people to assist, temporarily, to count the population. As a Census partner, HUD is committed to supporting this temporary employment in order to help ensure the accuracy of the census counts. Owner/ Agents are to exclude any temporary income payments received by residents from the U.S. Census Bureau.

Temporary is defined as employment lasting no longer than 180 days and not resulting in permanent employment. Employment verification of the dates of employment and amount of income must be maintained in the resident file.





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### Processing of Vacancy Claims During the COVID-19 Pandemic

On July 6, 2020, HUD provided guidance for the processing of vacancy claims for properties affected by COVID-19 during the period of March 27, 2020 to September 30, 2020. HUD has temporarily modified the start date for vacancy claims to accommodate for delays in filling vacant units as a result of impediments caused by COVID-19. Impediments resulting from state and local "stay-at-home" orders include, but are not limited to delays in units being prepared for occupancy, staff showing units to prospective residents, or meeting eligible applicants to process move-in documentation.

During this time, vacancy claims will be accepted for 60 days starting from the prior Tenant's Move-out Date as opposed to the Ready for Occupancy date, in instances where preparation of the unit for occupancy was prevented due to COVID-19. In addition, certain documentation submission requirements are amended, as noted below, for processing vacancy claims relating to COVID-19.

Temporary processing requirements for vacancy claims during the COVID-19 period:

- The claim must be received by HUD/CA within 180 days from the date the unit was vacated by a former tenant
- Claim Forms:
  - \* HUD 5270-A Part 2, Special Claims Schedule
  - \* HUD 52671-C, Special Claims for Regular Vacancies (use the date after the prior tenant move-out date to calculate the vacancy loss payment not to exceed 60 days)
  - \* For Claims submitted under this memo, Owner and Agents must mark the top of the form "COVID-19"
- Supporting Documentation:
  - \* Documentation as noted in the Special Claims Guide except with respect to unit readiness
  - \* Owner certification that COVID-19 has impeded the owner's efforts to fill the vacancy
  - Justification for all units explaining why the units remains vacant as a result of the COVID-19 pandemic
  - \* Certification that property marketing is compliant under the Affirmative Fair Housing Marketing Plan (AFHMP)

Special Claims for regular vacancies must be processed following the Special Claims Guide with the exception of the above date and documentation instructions.

In the event a property owner has submitted a vacancy claim prior to the issuance of the memorandum, and the special claim has been processed for payment, the owner may submit a supplemental vacancy claim for the gap period from the prior tenant's move-out date to the unit's ready for occupancy date. The gap period of days added to the days claimed on the prior submission must not exceed 60 days. No overlap in days can be claimed for payment.

You are encouraged to read the <u>HUD memo</u> in its entirety for complete guidance.



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### HUD Notice 20-07

On July 1, 2020, <u>HUD posted Notice H 20-07. Coronavirus Aid. Relief. and Economic Security (CARES) Act Eviction Moratorium</u>. The notice provides a summary of the CARES Act signed into law on March 27, 2020, and extends the moratorium on evictions for all HUD-insured or HUD-held mortgages while under forbearance. Additionally it outlines guidance on tenant protections for multifamily properties not subject to forbearance and those with HUD-assisted units.

#### Background

The CARES Act prohibits and Owner/Agent from filing for possession of a unit during the eviction moratorium solely for the purpose of any non-payment of any rent, fee, or charge for renters at HUD multifamily assisted or FHA-insured properties during the national emergency until July 24, 2020. Projects are also unable to charge fees, penalties, or other charges to the tenant related to the nonpayment of rent. The CARES Act does not include evictions that were filed before the moratorium was started or after it ends; or in cases where the eviction is based on reasons other than non-payment of rent.

#### Tenant Protections During Multifamily Forbearance

Borrowers that received or will receive forbearance under the CARES Act remain subject to the eviction moratorium and renter protection provisions until both the moratorium and the borrower's forbearance periods have expired. During the forbearance period, the borrower must inform all residents of the prohibition against eviction solely for the non-payment of rent. Borrowers can negotiate and obtain additional forbearance relief beyond the 90-day period provided by the CARES Act with HUD approval. To protect residents, tenant protections are extended during any forbearance period or the full duration of the 120-day moratorium. Owners/borrower's cannot: (1) require a tenant to vacate a dwelling unit located in or on the applicable property before the date that is 30 days after the date on which the owner/borrower provides the tenant with a notice to vacate solely for nonpayment of rent, and; (2) issue a notice to vacate under paragraph (1) until after the expiration of the forbearance. Additionally, the owner/borrower must allow a tenant that missed rent payments during the borrower's forbearance period to make up such missed rent payments over a reasonable time as determined in the sole discretion of the borrower. However, the owner/borrower must not require the missed rent payment be repaid in one lump sum at the end of the forbearance period. The borrower must not charge tenant late fees or penalties due to late or missed rent payments.

#### Tenant Protections for Mortgaged Properties Not Subject to Forbearance

HUD is concerned about the termination of the eviction moratorium in Section 4024 of the CARES Act. While the extension of the eviction protections provided to tenants residing in properties under forbearance will assist some renters, many tenants in properties with FHA-insured and HUD-held mortgages not under forbearance, who have experienced income loss, will not be similarly protected. Therefore, HUD is encouraging all owners of properties with FHA insured and HUD held mortgages (and Section 202/Section 811 financing) to work with tenants to avoid evictions. Measures include rent repayment plans, delayed evictions, or other measures to avoid measures during these difficult times. Owner/borrowers are also encouraged to check with state and local jurisdictions that may have local moratoria on evictions.





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## HUD Notice 20-07 (continued)

#### **Tenant Protections for Assisted Housing Units**

The CARES Act provides funding to assist in supporting various needs of project-based Section 8, Section 202 and Section 811 programs. Some of those funds have been designated for increased rental subsidy to cover tenant loss of income during the COVID19 emergency. Tenants in those program types have the option to request an interim recertification (IR) to reflect the loss of income, thus minimizing the impact of a loss caused by the COVID-19 emergency. The purpose of the allocated CARES Act funds is to cover the difference in reduced tenant rental payments to the property. HUD encourages tenants that receive housing assistance to inform their landlord and/or management agent of losses of income and request an IR. HUD is encouraging owners to inform tenants of their ability to request an IR in the event of reduced or lost income.

Tenants receiving housing assistance that experienced extenuating circumstances that prevented a timely recertification that resulted in an increase in tenant payment (when permitted by state/local laws) may owe the landlord/owner rent for months that have passed. HUD encourages owners to work with tenants on a repayment agreement for past due rental payments.

Tenants and management agents will find helpful information, including contact information for assistance for subsidized tenants, in the <u>Addressing Tenant Concerns During the COVID-19 National Emergency</u> brochure.

Multifamily project owners and management agents will find helpful information related to the eviction moratorium and resources for impacted tenants in the <u>Promoting Housing Stability During the COVID-19</u> <u>National Emergency</u> brochure.



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### **Streamlining Final Rule**

In December 2015 the President signed the Fixing America's Surface Transportation Act (FAST Act) into law. This allowed Public Housing Authorities (PHAs) and Owners to conduct full income recertifications with families with 90% or more of their income from fixed income every three years instead of annually. HUD issued an interim rule in December 2017 to align current regulatory flexibilities with those provided in the FAST Act and also sought to extend the streamlining changes that were proposed for the Public Housing and Housing Choice Voucher programs to certain Multifamily Housing Programs.

This <u>Streamlining Final Rule</u> finalizes the regulatory language to implement the FAST Act contained in the December 2017 interim rule. There was only one change at the final rule stage; the Final Rule clarifies that project owners are not required to make adjustments to non-fixed-income when using streamlined income determinations.

This article includes HUD responses to some of questions that were published in the final rule. Portions not applicable to the MFH program have been removed. This document does not contain all encompassing guidance for the Streamlining Final Rule. Owners and Agents are encouraged to read the <u>rule</u> in its entirety.

#### Implementation

**<u>1. Tenant Selection Plan (TSP)</u>**. Would an O/A need to create a policy or update their TSP to reflect their choice of implementing the streamlined method?

<u>HUD Response</u>: If an O/A chooses to implement streamlined methods, the TSP should be updated where the property's annual recertification requirements and interim recertification reporting policies are discussed.

2. Contract Amendments. How does HUD plan to amend assistance contracts of owners?

<u>HUD Response</u>: HUD does not believe that the changes made by the FAST Act interim rule necessitate a change in the assistance contracts of owners. The FAST Act interim rule made the following changes, none of which is addressed in a Housing Assistance Payment contract: (1) Streamlining certification of fixed income; (2) allowing for family declaration for assets under \$5,000; and (3) allowing owners to make a utility reimbursement of \$45 or less on a quarterly basis.

**<u>3. Software</u>**. How will the streamlining provisions be implemented with MFH's Tenant Rental Assistance Certification System (TRACS)? Will software packages know what to do if O/As either opt in or out of the streamlined certifications? May we suggest that some type of structure be implemented so that Management Occupancy Reviews can be conducted consistently across portfolios?

<u>HUD Response</u>: The provisions in this rule can be handled by the current iteration of TRACS. Although streamlining certifications is now permitted by O/As, form HUD–50059 is still required to be completed by O/As, signed by tenants, and submitted to TRACS. HUD will consider changes to TRACS that may make tracking streamlined years easier.



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## Streamlining Final Rule (continued)

**4. Medical Expenses.** The rule does not address how to treat medical expenses for residents with fixed income. Should O/As conduct full recertifications for residents with medical expense claims while conducting streamlined recertifications for residents that do not claim medical expenses? This rule does not incorporate the increased standard medical deduction and new threshold for deduction of allowable medical expenses or incorporate authority to use the past year's income and expenses that will be coming as the Housing Opportunity through Modernization Act (HOTMA) changes are implemented where HUD intends O/As to continue to provide annual adjustments for verified allowable medical expense deductions

<u>HUD Response</u>: The FAST Act and the interim rule provide administrative relief to O/As. O/As may elect a streamlined income determination for families on a fixed income. However, the provision only pertains to the verification of sources of income. O/As must continue to conduct third-party verification of deductions, including medical expenses deductions. HUD proposed a rule to implement income changes made by HOTMA, including medical expense deductions, published on September 17, 2019, at 84 FR 48820. HUD does not perceive a conflict between the FAST Act and HOTMA.

**<u>5.</u>** Triennial Certifications. Must an O/A verify income at the beginning of every third year of tenancy or every three calendar years from the date a tenant moves in? Please provide a common use form as a template or subsequent guidance or examples for O/As.

<u>HUD Response</u>: The provisions of this rule are discretionary. O/As that choose to implement streamlined annual recertifications must use third-party verification of income at move-in for new tenants and for existing tenants at the first annual recertification after the rule becomes effective. Streamlined methods of verification of income may be applied to the annual recertification the year after third-party verified certification (year 2) and the next annual recertification (year 3). Third-party verification of income must be used for the following annual certification (year 4). HUD will not provide a common use form at this time.

**<u>6. Staggered Certifications</u>**. Can an O/A 'stagger' the implementation of triennial recertifications of assisted households to mitigate substantial increases in work at the end of each triennial period?

<u>HUD Response</u>: Staggering recertifications has a potential impact of disparate treatment among similarly situated families. O/As choosing to implement triennial recertifications must afford all households the equal ability to utilize options in the final rule. HUD will not permit responsible entities to stagger recertifications. Income verifications following new admissions or interim reexaminations will naturally be staggered. Existing families will have had the first triennial verification 3 years after implementation. Any new admissions in the year following initial implementation for existing families will have income verification in the year following initial implementation and then 3 years after that.



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## Streamlining Final Rule (continued)

**7.** Using Prior Certifications. HUD should allow the full certifications that owners and agents completed prior to the implementation of the rule on March 12, 2018, to qualify under the rule. This would allow PHAs and owners to benefit from the rule despite its delayed implementation.

<u>HUD Response</u>: The authority to utilize provisions of this rule was not granted until March 12, 2018. Certifications completed prior to the rule's implementation date cannot be included in the year 3 streamline certification cycle. Additionally, the first eligible COLA-based certification is April 2019.

**<u>8.</u> Previously Reported Income**. O/As should be allowed to use previously reported income in years 1, 2, or 3 for purposes of calculating tenant rent share and rent subsidy if the tenant has a transfer of unit or relocation.

<u>HUD Response</u>: For MFH programs, unit transfers cannot occur between properties. The new property must process a move-in certification and begin the streamlined process from the third-party verified move-in certification. For unit transfers within the property, owners are permitted to continue with the streamlined schedule unless the transfer involves circumstances that result in the family being unable to certify that 90 percent of income is fixed and fixed sources have not changed from the prior year.

**9.** Enterprise Income Verification. Will HUD include language from Notice H-2016–09 and Notice H 2010–19 on the use of the Enterprise Income Verification (EIV) System in the rule so that it is clear that O/As must continue full income verification for residents with more than 10 percent of income from non-fixed sources? Also, that O/As may use current applicable interest rates available from public sources or tenant-provided, third-party generated documentation to determine interest income on net family assets?

<u>HUD Response</u>: The provisions of the rule do not change established EIV requirements. EIV usage will be further defined in program guidance. Requirements related to determining interest income on net family assets are not changed are by this rule.

#### Requests for Clarification

**10. Hardships**. Please provide clarification on what policies O/As should adopt to assist tenants that might experience a financial hardship under the rule. A tenant that receives a utility reimbursement has very limited or no income and therefore it would be difficult to determine what would constitute a hardship. Has HUD analyzed or calculated the amounts at which tenants may claim a financial hardship?

HUD Response: Hardship policies for utility reimbursements will be addressed through program-specific guidance.

**<u>11. Relationship with Annual Re-examinations</u>**. Please clarify that those projects that implement annual reexaminations for fixed sources of income would still have to adjust tenant-paid utility allowances.

<u>HUD Response</u>: The provisions of this rule do not affect the regulation and program guidance governing the requirements of adjusting utility allowances. O/As must perform utility allowance adjustments in accordance with established guidance.





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## Streamlining Final Rule (continued)

**12.** Required Interim Recertifications. HUD should make explicit that interim recertifications are not required of O/As when the COLA is to take effect, but the COLAs will instead be applied to household income on an annual basis at their lease anniversary.

<u>HUD Response</u>: This rule requires that an adjustment be made at annual recertification. HUD is not prohibiting interim recertifications as a result of a change in the COLA. Tenants and O/As must continue to follow the income recertification requirements identified in the lease agreement.

### Status of MORs Performed by PBCAs

Effective May 22, 2020, HUD has lifted the suspension of Management and Occupancy Reviews performed by PBCAs in locations where there are no restrictions by state or local law or ordinance to prevent them from doing so. This supplemental guidance additionally established an alternative manner in which a MOR may be conducted. The alternative manor MOR includes the following:

- HUD will, until September 30, 2020 (or such later date as HUD may determine), allow PBCAs to conduct on-site MORs without entering resident units.
- For REAC follow-up, in determining whether EH&S and other deficiencies have been corrected, the PBCA must attempt follow-up on those affected units via contact directly with the resident by way of phone or email and document the results or attempt(s) made on the MOR report.
- A physical on-site visit to the property must still occur to document the physical conditions, general appearance, security of the property and should include a visual assessment of each building and grounds of the property but does not require an assessment of resident units.
- An on-site entrance/exit interview should occur except in instances where state or local law or ordinances prevent such meetings.
- Tenant file review must be completed on-site, as HUD is not authorizing the transfer, either electronically or physically, of tenant files off-site.
- All other portions of the MOR, Desk Review and On-site review must be completed in their entirety. This includes an on-site review of tenant files.

The PBCAs have been requested to move forward with their work plans for MORs in an effort to continue to provide oversight and monitoring of the Project Based Rental Assistance program. Owners and/or Agents will be contacted directly by their PBCA for scheduling of the MOR and the Department asks for your cooperation in arranging and completing the entrance/exit interviews and allowing the PBCA to perform the file review on-site when not prohibited by state or local law. HUD continues to encourage Owners and Agents to follow the Center for Disease Control and Prevention (CDC) guidelines and the directions given by local health officials.

The full memorandum can be found here.



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## **CAHI Member Spotlight**

#### CAHI Member Spotlight Priscilla DeLaCruz- Local Contract Specialist



How long have you been with CAHI? I have been with CGI for 16 years in July.

What was your background prior to working with CAHI? Prior to CGI and OHA, I held a position in Netscape/AOL as an Associate Quality Assurance Engineer.

What are your hobbies? Things you enjoy doing after you leave the office?

I like collecting keychains and shot glasses from all the places I have been. I enjoy listening to music and work out after I leave the office.

What brings you the most satisfaction in your day to day tasks? I get a lot of satisfaction out of completing my daily to do lists for work.

What is the best piece of advice you that you could provide to an owner/agent? Stay committed to your decisions, but stay flexible in your approach.

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: www.cahi-oakland.org OR send an email to

Christine.Fitzpatrick@cgifederal.com

## All Residents of HUD Subsidized Properties



California Affordable Housing Initiatives (CAHI) is the HUD Contract Administrator and is responsible for responding to resident concerns. CAHI 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:

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- Questions or concerns regarding work order follow-up.
- Housing Initiatives, Inc. 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, 8:00am to 5:00pm
- Contact Numbers: 800-982-5221 fax: 614-985-1502 (leave message after hours)
- Written Summaries: 8760 Orion Place, Suite 110, Columbus, Ohio 43240
- Email: <u>PBCAContactCenter@cgifederal.com</u>
- Website: www.cahi-oakland.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

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