

Housing



BULLETIN

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AMERICAN ASSOCIATION OF HOMES AND SERVICES FOR THE AGING

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HUD Management Update

This edition of the HUD Management Update includes recent guidance on Service Coordinator/CHSP contract extensions; the automatic extension thru April 30 for Dec 31 financial submission deadlines; details on waivers to Section 8 renewal policies to encourage preservation; a head's up on significant changes coming to HUD age and/or income waivers in senior housing; timely info on systems certification and/or security training requirements for TRACS and SAVE; highlights of the recent HUD TRACS/Industry meeting; some useful information about bedbugs, including access to the archived free online webcast training; and a new report out on the state of accessibility in housing in the U.S.

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FY10 Service Coordinator and CHSP Grant Extension and Revised Financial Reporting Form

HUD posted the FY10 grant extension guidance for Service Coordinator and Congregate Housing Services Program (CHSP) grantees online on March 4, 2010. The notice details the process for extending existing service coordinator and CHSP grants that will end on or before December 31, 2010. In general, the notice provides for a 2.7% increase for all Service Coordinator grant renewals/extensions. Renewal or extension requests should be submitted at least 120 days prior to current expiration, and no later than August 1, 2010 for contracts that will run out of funds between October and December in order to secure advance funding to avoid payment gaps during the fiscal year changeover. [Read HUD Notice at http://www.hud.gov/offices/hsg/mfh/scp/resources.cfm](http://www.hud.gov/offices/hsg/mfh/scp/resources.cfm)

Updated Form SF-425 for Financial Reporting Requires Use of DUNS Number

Please note that the SC website still includes links to form SF-269 for semi-annual financial reporting. This form was used by grant recipients to report the status of their grant funds. However, the form has recently been cancelled and replaced by updated form SF-425: Federal Financial Report (FFR), Standard Form (SF) 425 for use throughout the Federal Government. The FFR was designed to replace the Financial Status Report (SF269) and the Federal Cash Transactions Report (SF272) with one comprehensive financial reporting form, which also includes a requirement for use of DUNS Numbers. If you're unfamiliar with DUNS numbers, they are easily obtained. For more details, see http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/grants/duns. Find the new SF-425 at <http://www.forms.gov/bgfPortal/docDetails.do?dId=15149>

HUD System Issues Result in Automatic Extension of Annual Financial Submission Deadline

On 3/22/10, HUD posted a statement acknowledging online system problems impacting electronic submissions of annual financial statements for owners whose project fiscal year ends 12/31/2009. As a result, a blanket 30 day extension until 4/30/2010 has been granted for their financial reporting submissions. System errors also resulted in a failure to send timely notification of overdue submissions between Sept 2009 and March 9, 2010. Such overdue notices went out on March 10, 2010, even if submissions had subsequently been made. See the full HUD announcement at <http://www.hud.gov/offices/reac/products/prodmf.cfm>.

Memo Encourages Waivers to Section 8 Renewal Guide to Facilitate Preservation

During the AAHSA Future of Aging Services conference (February 2010), officials from the Department of Housing and Urban Development (HUD) announced the availability of waivers from current regulatory requirements in the Section 8 Contract Renewals guidebook, which could facilitate better underwriting and assist with the preservation of affordable housing for seniors. A HUD memo to the field was issued immediately after our meeting to permit waivers for Section 8 rents exceeding tax credit or market rents, underwriting use of after-rehabilitation rents, and access to equity for non-profits. HUD is working on formal changes to the Section 8 regulations and the Section 8 Renewal Guide. In the interim any waiver requests should be submitted to regional hubs and contract administrators.

The memo specifically encourages its Field Office to submit requests on behalf of owners for the following:

- Regulatory Waivers
 - 880.205(a), 881.205(a), or 883.306(a) to allow a nonprofit owner with a new regulation Section 8 contract to receive distributions.

- Section 8 Renewal Guide Waivers
 - The Note found after Section 3-2D that restricts rents to use restricted levels.
 - In Chapter 15:
 - the requirement in Section 15-8 that rents in a RCS reflect use restrictions on the property;
 - the requirement in Section 15-13 that the property have a REAC score of greater than 30, and
 - the prohibitions against for-profit owners who wish to comply with the requirements of Chapter 15 from obtaining the benefits under the chapter.

In order for the waiver to be approved by Headquarters, the Hub Director must approve the request and submit it, along with certain other material; including: the major features of the transaction, specific provisions to be waived, proposed sources of financing, proposed ownership changes, timing of the transaction, and how the waiver would facilitate the preservation of the project. The information from the Hub should also indicate if any related requests have been or will be submitted to allow for prepayment of the existing mortgage, decoupling of the Interest Reduction Payments, or deferral of flexibility subsidy loans. Waivers will not be issued for transactions that have already closed.

Read the HUD memo at www.aahsa.org/WorkArea/DownloadAsset.aspx?id=11058

New Policy Allows for Age / Income Waivers - One-time Only, with No Rental Subsidy Provided

Officials at the Department of Housing and Urban Development (HUD) advised AAHSA staff during a March 26th meeting of a new policy, soon to be issued, to address what HUD perceives is an excess of age and income waivers in Section 202 housing. The new policy will allow housing owners to obtain only one, one-year age and/or income waiver, without the successive extensions many owners have obtained in the past. Under-age or over-income residents will be given only a one-year lease, with no extension possible. These residents will pay no more than 30% of their adjusted income, but owners will receive no subsidy for those units which will be considered technically out of compliance. All current age/income waivers will continue to be honored under the old practices, and such properties may apply for one, and only one, more year of waivers on the anniversary date, subject to the new conditions. For background on this revelation, see <http://www.aahsa.org/article.aspx?id=11203>

SAVE System Requires Password Update to Retain Access

SAVE is a web-based automated verification system owned by DHS that consists of immigration status verification information. The Department of Homeland Security (DHS) streamlined the Systematic Alien Verification for Entitlements (SAVE) database such that, beginning on May 1, 2010, users must have an updated ID and password to access the SAVE system. Those who already received a User ID and temporary Password since June 2009 from HUD are fine, and nothing else needs to be done. Authorized users of HUD's Enterprise Income Verification (EIV) system who are also authorized to use the SAVE system are now able to access SAVE from EIV.

Those who wish to add additional users at this time, or who have access and did NOT receive a new User ID and temporary Password since June 2009, should have sent property, name, address, fax and phone number by email to: Kevin.X.Garner@hud.gov by April 15.

Accept New "Rules of Behavior" and Complete Security Training for WASS/TRACS Access

HUD posted a couple announcements related to new TRACS Security Training and Rules of Behavior requirement in early April. Though the TRACS alert uses common terminology ("rules of behavior" and "security training" requirements), and a similar online certification underway regarding maintenance of use of EIV, these are actually separate initiatives underway to help bring users of various HUD systems into compliance with nationally required federal systems safety and security protocols. For TRACS purposes, this initiative won't be available until May 1st, but must be completed by September 3, with instructions which vary depending on your software and/or user status.

According to the announcements, starting May 1 (and not before), users logging into WASS/Secure Connections and selecting TRACS will be prompted to accept a new "rules of behavior" and complete a required security training module within 30 days. Users who access TRACS reports, but do not transmit TRACS data, must do this either on or by July 3. And those who send TRACS files directly from software systems such as OneSite, iCAM, Yardi Voyager, Cornerstone, HDS, or CATRACTr, - which have a system-to-system interface - will still need to go to Secure Connections to accept the Rules of Behavior by no later than September 3, 2010. User can accept the "rules of behavior" at log-

in, and then have 30 days to complete the security training which will be provided online. This training and certification for TRACS systems will be required annually. Find the April 2 and April 9 announcements on the TRACS page at <http://www.hud.gov/offices/hsg/mfh/trx/announcements.pdf>.

[AAHSA Note: we've already asked HUD systems administrators to help keep everyone on track with the various log-in, password and security certification timeframes by developing a chart of online systems including name/acronym, user/coordinator access/certification requirements timing/timeframes, as well as the primary source for user info, and appropriate help-desk contacts. Hopefully this will be made available soon.]

HIGHLIGHTS from HUD/TRACS MEETING

During the March 17, HUD/TRACS Industry meeting, HUD revealed a number of achievements and intended goals in the area of HUD online systems and new and ongoing data collection and integration efforts. HUD staff members are excited about the fact that funding was made available for transformation of HUD technology and modernization of key systems. The question is, how much will be allocated to multifamily systems and when. Among specifics discussed, continued improvements to TRACS, iMAX, and future single-entry log-on for WASS access to include the various REAC systems of physical inspections (PASS), previous participation certifications (APPS), online submission of annual financial statements (AFS), etc. There is certainly much going on with various HUD systems and databases regarding access, security enhancements and planned systems upgrades as HUD prepares to migrate over to Oracle. Some of which have time sensitive deadlines, as noted in the earlier item regarding SAVE and TRACS. Following are some highlights, for which detailed PowerPoint slides are available at <http://www.hud.gov/offices/hsg/mfh/trx/trxmeet.cfm>.

Now, if that sounds too technical (which it clearly is, much of it over my head, and certainly beyond my direct knowledge, as I have no systems user access), hopefully you have systems folks and/or good software vendors and trainers who will be able to tell you more about them when they go into effect. If so, stop here and skip to the end. But, if you're interested in learning more, read on:

TRACS Future Changes / Enhancements

In September of 2010, HUD will be migrating the iMAX and iMAT functions over to new IBM/Oracle servers. Before that transition occurs, HUD announced it would start to send out notices regarding new iMAX Rules of Behavior and Security Training, which must be performed annually. Such notices have already gone into circulation (see story on WASS/TRACS access above). TRACS will also be undergoing an online "facelift" for the September updates. In the future, HUD expects to link iMAX and WASS user ids and a new single system authentication; and return all TRACS response files to sender and owner/agents. For more details on what was presented, see <http://www.hud.gov/offices/hsg/mfh/trx/meet/2010futurechanges.pdf>.

Low Income Housing Tax Credit (LIHTC) Tenant-Level Data Collection

Though no funding has yet been provided, HUD is moving forward with its directive to collect tax credit data as instructed by Congress in 2008. HUD's responsibility is to establish standards and definitions for the data collection, and to provide states with technical assistance in establishing

systems to compile and submit the data. For now, tenant data models are likely to follow the NCSHA model “tenant information certification” or TIC. For project characteristics and tenant level data, in theory, owners will not have to submit anything they aren’t already. But much remains to be worked out. Find out more about the direction this is going in the presentation slides available at <http://www.hud.gov/offices/hsg/mfh/trx/meet/2010lihtcollection.pdf>

Active Partners Performance System (APPS) Update

Baseline project data will now be locked upon completion of that data entry area. Inaccurate or out of date information may be due to the fact that pre-1999, the information used came through REMS, and internal HUD real estate management system. Those who have incorrect project identifiers should first try to register online at <http://www.hud.gov/offices/hsg/mfh/apps/appsmfhm.cfm>, otherwise, contact the Policy and Participation Standards Division at (202) 708-1320 or contact james_e.collins@hud.gov See the presentation slides at <http://www.hud.gov/offices/hsg/mfh/trx/meet/2010appsupdate.pdf>

Enterprise Income Verification (EIV) 9.1 "What's New"

As indicated earlier, EIV is in the process of updating user security testing processes and certifications, information about which should “pop-up” on user screens after log-in starting April 19 and users will have 30 days to complete, and need to be taken/updated annually. Some additional changes are coming to the internal Multiple Subsidy screens, including linking of the last 4 digits of the SSN to the report for ease of use. These and other changes will go live on April 19. For more info: <http://www.hud.gov/offices/hsg/mfh/trx/meet/2010eiv91whatsnew.pdf>

WASS High-Level Diagram

For more on single-site sign-in plans for the future, see the flow chart at <http://www.hud.gov/offices/hsg/mfh/trx/meet/2010wassdiagram.pdf>

USEFUL RESOURCES

“Ideas in Action” – HUD’s New Online “Suggestion Box”

Also covered at the TRACS meeting, and somewhat systems related, HUD announced that it is reaching out through social media as” a way to expand the traditional suggestion box, and encourages individuals to suggest, comment and vote on various items posted; enabling participants to see and build off ideas of others.” It is set up with 7 broad topic categories, to help organize submission and review. While action on suggestions is not guaranteed, it does represent another way of communicating feedback and recommendations, like our earlier letter on suggestions to reform to the regulatory development process. Check it out, vote and/or submit ideas of your own at <http://hudideasinaction.uservoice.com/pages/34047-transform-the-way-hud-does-business-external> (click on the “new” tab to see the latest suggestions in each category)

Don't Let the Bed Bugs Bite!

HUD's office of HUD's healthy homes conducted in March a webinar focused on a newly released report on bedbugs and latest evaluations regarding treatment/prevention. The science and practice of bedbug prevention and management is a rapidly evolving issue, so it's good to try to keep up with the latest. This report can be found at http://www.nchh.org/Portals/0/Contents/bedbug_report.pdf. And the webinar presentation slides are also available on HUD's Healty Homes webpage on "integrated pest management" at http://healthyhomestraining.org/ipm/NCHH_Bed_Bug_Presentation_3-5-10.pdf

The National Center for Healthy Housing has developed tools and resources to help property managers, staff, residents and pest management professionals implement an integrated pest management program. For more information, check out <http://healthyhomestraining.org/ipm/>

Improving Housing Opportunities for People with Disabilities

The National Council on Disability (NCD) has released a report entitled *The State of Housing in America in the 21st Century: A Disability Perspective*. The report provides recommendations to improve housing opportunities for people with disabilities. The research contained in this report presents a comprehensive overview of the state of housing in the twenty-first century, and answers important questions about the current housing needs and options for people with disabilities living in the United States. Download a free copy of the report at:

http://www.ncd.gov/newsroom/publications/2010/NCD_Housing_FIN.pdf

Sign up for the AAHSA Housing Management Listserv

Don't miss out on the excellent resource of shared knowledge available through the member-to-member discussions over the AAHSA Housing Management listserv. Listserv activity fluctuates depending on the issue, but recent inquiries have solicited suggestions for implementation of new trash collection/recycling programs, establishing non-smoking policies, and elicited models of various conflict of interest statements for board and/or staff members. Sign up for the listerv at

<http://www.aahsa.org/emailsubscribe.aspx>.

The latest preceding AAHSA Housing Bulletin is dated February 2010, with additional updates provided in the intervening e-newsletters "AAHSA Housing Report" monthly and "AAHSA This Week". Other HUD Management Updates may be found archived at <http://www.aahsa.org/article.aspx?id=736>

To ensure you are receiving all desired AAHSA e-communications, or to sign up for the AAHSA Housing Management listserv (with more immediate operational alerts, and the opportunity to leverage member experiences/resources), go to <http://www.aahsa.org/emailsubscribe.aspx>.

For more information on these and other HUD management issues, contact Colleen Bloom, AAHSA Associate Director for Housing Operations, at (202) 508-9483 or cbloom@aaahsa.org.