MORs &
Top 10 Findings

and how to avoid them!

AHMA NCH Annual Conference 2025

California Affordable Housing Initiatives and CGI Federal

We'll start soon…

California Affordable Housing Initiatives, Inc. CGI

Housekeeping

- Please feel free to ask questions as we go along, raise your hand!
- Silence your phones
- We'll make a pdf version of this presentation available

The goal of this session is to familiarize owners and agents on the Management and Occupancy Review Process (MORs) and to cover the top 10 MOR findings and how you can avoid them.

You should come away with an understanding and general expectations how the MOR process is implemented.

MOR Agenda

- ✓ Housekeeping/Intros
- ✓ The MOR
- ✓ History
- ✓ Process and Prep
- ✓ Reports

- ✓ Top 10 Conditions/Findings, How to Avoid Them & Preparing for your next MOR

- ✓ Resources

- ✓ Recap

- ✓ Q&A

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Your CAHI Team

CAHI	
Keischa Harris – Contract Administrator	Charles Young – State Contracts Manager

Contact Center	
Andrea Pitts–Hampston – Customer Relations Manager	Kathryn Baranek – Customer Relations Specialist
Anna Stewart – Customer Relations Supervisor	Cathryn Huse – Customer Relations Specialist
Christopher Charles – Customer Relations Specialist	Jermaine Watkins – Customer Relations Specialist
Darlene Keyes – Customer Relations Specialist	Josephine Spencer – Customer Relations Specialist

Asset Management - Ann Ninh	
Ann Ninh – Asset Manager	
Cynthia Colvin – Contract Specialist	Mariano Gonzalez Hernandez – Contract Specialist
Shannon Haire – Contract Specialist	Michelle Barrios – Contract Specialist

Asset Management - Darline Burell	
Darline Burrell – Asset Manager	Alicia Miranda Emerson – Contract Specialist
Tamikia Johnson – Contract Specialist	Kathleen Agustin – Contract Specialist
Andrew Thomas – Contract Specialist	

Local Services Management - Paul Rabuy	
Paul Rabuy – Manager of Local Services	
Priscilla De La Cruz – LCS Team Lead	Holly Schroeder – Local Contract Specialist
Victor Wong – Local Contract Specialist	Carole Blackford – Local Contract Specialist
Tenia Decuire – Local Contract Specialist	
Theresa Campbell – Local Contract Specialist	

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Who or What is California Affordable Housing Initiatives (CAHI)??

Management & Occupancy Reviews (MORS)

What are they and a brief history

Management & Occupancy Reviews (MORs)

"The management review is one of the integral mechanisms of project monitoring used to ensure that owners/agents comply with the requirements under the Regulatory Agreement, Mortgage, Management Certification, Housing Assistance Payments (HAP) Contract and/or other relevant business agreements."

- HUD Handbook 4350.1 Multifamily Asset Management and Project Servicing, Chapter 6 Project Monitoring

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MORS 2004-Present

- MORs occurred annually in Northern California starting in 2004

- 2011, HUD suspended all MORS around the country

- 2016, MORS restarted in the Summer. 66% of PBCA's portfolio annually. MORs approved quarterly by HUD HQ.

- 2022, Final Rule on MOR scheduling, Risk based scheduling of MORs

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Scheduling

Work Plan Approvals

- HQ requests submissions for approval about 4 weeks before the end of each quarter

Final Rule on Risk-based Scheduling

Previous MOR	Unsatisfactory	Below average	Satisfactory	Above average	Superior
Next MOR must be conducted within . . .					
Risk Classification: Troubled	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.
Risk Classification: Potentially Troubled.	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.	12 months of previous MOR.
Risk Classification: Not Troubled	12 months of previous MOR.	12 months of previous MOR.	24 months of previous MOR.	36 months of previous MOR.	36 months of previous MOR.

Scheduling Notification

- CAHI LCS reaches out to property

- Send written notice

HUD TRIVIA

Who is the current Secretary of Housing and Urban Development?

1. Linda McMahon

2. Scott Turner

3. Jerome Powell

Answer:

2. Scott Turner

Prepping for your MOR On-site Visit

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How the PBCA is preparing

- Addendum C Documents

- Details about the last Physical Inspection (REAC)

- Unresolved findings from the previous MOR

- Year of construction of property and primary housing population

- Effective date of last rent adjustment and Utility Allowance, if applicable.

- Timeliness of monthly voucher submissions.

- Information on property operations (i.e. vouchering & special claims)

- Tenant calls and complaints and congressional inquiries received through the call center

- Review of EIV and TRACS reports

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Addendum C

Management Review for Multifamily Housing Projects	U.S. Department of Housing and Urban Development Office of Housing – Federal Housing Commissioner	**ADDENDUM C** OMB Approval No. 2502-0178 Exp. 04/30/2018

DOCUMENTS TO BE MADE AVAILABLE BY OWNER/AGENT

Project Name: FHA/Project#:   Section 8/PAC/PRAC#:

Instructions: Reviewers should place a check mark next to those items that must be available for review. Included in this list are FHEO staff instructions to provide MFH staff a list of requests for documents and special observations each year.

General Documents

- ☒ All Tenant Files and records, including rejected, transfer and move-out files
- ☒ Current waiting list **(send electronically)**
- ☒ Last advertisement and/or copies of apartment brochures
- ☒ HUD-approved Rent Schedule form HUD-92458
- ☐ Procurement Files
- ☒ Work Order Journals and Logs
- ☐ Cash Disbursement Journal
- ☐ Fidelity Bond
- ☐ Property and Liability Insurance
- ☒ Copies of the form HUD-52670 for the last twelve months, for each subsidy contract
- ☐ Current annual budget
- ☐ Quarterly budget variance reports
- ☐ Reserve for Replacement component analysis
- ☒ Copy of Rent Roll
- ☒ Copy of Application form **(send electronically)**
- ☒ Copy of lease, lease addenda and house rules **(send electronically)**
- ☒ Copy of Pet Policy **(send electronically)**
- ☒ Copy of Applicant Rejection Letter **(send electronically)**
- ☒ Annual Unit Inspections
- ☒ Fact Sheet "How Your Rent Is Determined"
- ☒ Copy of the "Resident Rights & Responsibility"
- ☒ Lead Based Paint Certifications **(send electronically)**
- ☒ EH & S Certifications

How You Can Prepare for Your MOR and On-site Visit

- Addendum C documents

- Tenant File Sample

- Review Past MORS. Unresolved Conditions? No repeat Conditions!

- Prior to visit, let us know if tenant files are located off site!

- 24 hour notice to tenants that units may be entered*

- Notify your staff and maintenance teams

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HUD FORM 9834

Management Review for Multifamily Housing Projects
U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner
OMB Approval No. 2502-0178
Exp. 04/30/2018

On-Site Review (Continued)

j. If there are automobiles and/or debit or credit cards charged to the project, are the titles kept in the name of the project?   Yes ☐ No ☐
If yes, do they have HUD approval?   Yes ☐ No ☐

Comments:

CATEGORY E. LEASING AND OCCUPANCY (This Category does not apply to Mortgagees)

14. Application Processing and Tenant Selection

a. Does the application form contain sufficient information to determine applicant eligibility?   Yes ☐ No ☐

Comments:

b. Does the application ask whether the applicant or any member of the applicant's household is subject to a lifetime state sex offender registration program in any state?   Yes ☐ No ☐

Comments:

c. Does the application ask for a listing of states where the applicant and members of the applicant's household have resided?   Yes ☐ No ☐

d. Is form HUD-92006 "Supplement to Application for Federally Assisted Housing", an attachment to the application or part of the application package?   Yes ☐ No ☐

Comments:

e. Is there an arms length procedure between the person who denies an application and the application appeal reviewer?   Yes ☐ No ☐

Comments:

f. Has the owner/agent leased a Section 8 unit to a police officer or security personnel who is over the income limits for the project?   Yes ☐ No ☐
If yes, has HUD or CA authorized the admission?   Yes ☐ No ☐

Comments:

g. Does the owner/agent have a written tenant selection plan?   Yes ☐ No ☐
If yes, does the plan include all required criteria stated in Chapter 4, Handbook 4350.3 REV-1 and all applicable notices?   Yes ☐ No ☐ N/A ☐
If no, list the required criteria that the tenant selection plan does not include:

Comments:

h. Does the project maintain a waiting list of prospective tenants?   Yes ☐ No ☐ N/A ☐
If yes, does the list include all required elements stated in Handbook 4350.3 REV-1?   Yes ☐ No ☐

Comments:

i. Enter the number of applicants on the waiting list for each type of unit: 0 BR ___ 1 BR ___ 2 BR ___ 3 BR ___ 4 BR ___ Other: ___

Comments:

j. Were the applicants selected from the waiting list in the proper order, recognizing applicable preferences?   Yes ☐ No ☐

Comments:

k. When preferences were applied, were they properly documented?   Yes ☐ No ☐ N/A ☐

ADDENDUM A

Management Review for Multifamily Housing Projects
U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner
OMB Approval No. 2502-0178
Exp. 04/30/2018

Tenant File Review Worksheet

Tenant File Review Worksheet

Instructions: Review the appropriate number of tenant files and complete a copy of this worksheet for each file reviewed. Indicate the initial move-in date in the appropriate box. Indicate by marking the appropriate box (Yes, No, or N/A) for each document available in the tenant file. For move-out and applicant rejections files, reviewer should only complete the pertinent sections.

Name of Reviewer: _____

Type of Review:
☐ Applicant Rejection   ☐ Tenant Move-In   ☐ Tenant Move-Out   ☐ Certification/Recertification

Effective date of certification(s) reviewed: _____

If this is a Certification or Recertification, check the certification type:
Certification Type   ☐ Initial   ☐ Annual   ☐ Interim   ☐ Corrections   ☐ Other

Family Name: _____   Unit Number: _____   Move-in Date: _____

Bedroom Size: ☐ 0 Bedroom ☐ 1 Bedroom ☐ 2 Bedroom ☐ 3 Bedroom ☐ 4 Bedroom ☐ 5 or more Bedrooms

A. HOUSEHOLD INFORMATION		Comments
1. Is the application complete, including the date and time received by the owner/agent?	Yes ☐ No ☐	
2. Is there a form HUD-92006, "Supplement to Application for Federally Assisted Housing" in the files of tenants who applied after 12/14/2009? **Tenant completion of this form is optional.**	Yes ☐ No ☐ N/A ☐	
3. Are the EIV Existing Tenant Search results in the file along with contacts made as a result of the search? **Applicable to move-ins after January 31, 2010**	Yes ☐ No ☐ N/A ☐	
4. Are the household members identified correctly? (as head, spouse, dependent, co-head, other adult(s), live-in aide, foster child and foster adult)	Yes ☐ No ☐	
5. Is the unit size appropriate for household?	Yes ☐ No ☐	
6. Was this household's income eligible at move-in? **This question applies only to a tenant file move-in review.**	Yes ☐ No ☐ N/A ☐	Over income? ☐ Low income? ☐ Very low income? ☐ Extremely low income? ☐
7. If household was not income eligible at move-in, was an exception or waiver granted?	Yes ☐ No ☐ N/A ☐	
8. Does the file contain the ethnicity and racial Data Certification as provided to the	Yes ☐ No ☐	

The On-site Visit

Entrance Meetings

- Review the planned schedule for the visit

Day of On-site Visit

- Tenant File Sample

- Recent MO, Rejected Applicant, Repayment Agreements

- Addendum C documents

- Vacant Units

- REAC/NSPIRE Follow-up, visit maintenance facilities

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Exit Meeting

Post Visit

Receive Written Report within 30 days

- Appeals

- CAHI's Quality Assurance Team

  may follow up

- Summary Page

- Tenant File Summary

- Conditions

Management Review for Multifamily Housing Projects	U.S. Department of Housing and Urban Development Office of Housing – Federal Housing Commissioner	OMB Approval No. 2502-0178 Exp. 04/30/2018

Summary

Date of On-Site Review:	Date of Report:	Project Number:	Contract Number:
Section of the Act:	Name of Owner:	Project Name:	Project Address:

Loan Status:	Contract Administrator:	Type of Subsidy:		Type of Housing:
☐ Insured ☐ HUD-Held ☐ Non-Insured ☐ Co-Insured	☐ HUD ☐ CA ☐ PBCA	☐ Section 8 ☐ PAC ☐ Section 236 ☐ Section 221(d)(3) BMIR	☐ Rent Supplement ☐ RAP ☐ PRAC ☐ Unsubsidized	☐ Family ☐ Disabled ☐ Elderly ☐ Elderly/Disabled ☐ Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

	A	C	TCD	
A. General Appearance and Security	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. ____ is 10% of the overall score. This category is rated
1. General Appearance	☐	☐		
2. Security	☐	☐		
B. Follow-up and Monitoring of Project Inspections	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. ____ is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	☐	☐		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	☐	☐		
C. Maintenance and Standard Operating Procedures	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. ____ is 10% of the overall score. This category is rated
5. Maintenance	☐	☐		
6. Vacancy and Turnover	☐	☐		
7. Energy Conservation	☐	☐		
D. Financial Management/Procurement	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. ____ is 25% of the overall score. This category is rated
8. Budget Management	☐	☐		
9. Cash Controls	☐	☐		
10. Cost Controls	☐	☐		
11. Procurement Controls	☐	☐		
12. Accounts Receivable/Payable	☐	☐		
13. Accounting and Bookkeeping	☐	☐		
E. Leasing and Occupancy	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the *Leasing and Occupancy Rating*. If this Section was not reviewed, enter 0. ____ is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	☐	☐		
15. Leases and Deposits	☐	☐		
16. Eviction/Termination of Assistance Procedures	☐	☐		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	☐	☐		
18. Compliance with Using EIV Data and Reports	☐	☐		
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	☐	☐		
20. TRACS Security Requirements	☐	☐		
21. Tenant File Security	☐	☐		
22. Summary of Tenant File Review	☐	☐		
F. Tenant/Management Relations	**A**	**C**	**TCD**	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. ____ is 10% of the overall score. This category is rated
23. Tenant Concerns	☐	☐		
24. Provision of Tenant Services	☐	☐		
G. General Management Practices	**A**	**C**	**TCD**	General Management Practices Rating. If this Section was not reviewed, enter 0. ____ is 10% of the overall score. This category is rated
25. General Management Operations	☐	☐		
26. Owner/Agent Participation	☐	☐		
27. Staffing and Personnel Practices	☐	☐		

Overall Rating: ☐ Superior ☐ Above Average ☐ Satisfactory ☐ Below Average ☐ Unsatisfactory ____ Overall Score:

To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.

<table>
<tr><td colspan="2">Management Review for Multifamily Housing Projects</td><td>U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner</td><td>OMB Approval No. 2502-0178
Exp. 04/30/2018</td></tr>
</table>

Summary

SUMMARY REPORT – FINDINGS

For each "C" item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding		Target Completion Date
Total Units: 50 Assisted Units: 43	MI denotes Move-In AR denotes Annual Recertification IR denotes Interim Recertification O/A denotes Owner Agent TSP denotes Tenant Selection Plan SS# denotes Social Security Number TCD denotes Target Completion Date ETS denotes Existing Tenant Search TRACS denotes Tenant Rental Assistance Certification System ETP denotes Emergency Transfer Plan HOH denotes Head of Household	MO denotes Move-Out GR denotes Gross Rent IC denotes Initial Certification TTP denotes Total Tenant Payment VAWA denotes Violence Against Women Act AFHMP denotes Affirmative Fair Housing Marketing Plan EIV denotes Enterprise Income Verification CAHI denotes California Affordable Housing Initiatives	
Files Reviewed: 5	*No conditions* **Unit 201 John Doe, MI XXXXXX, AR XXXXXX** Deficiency Deficiency Deficiency **No repayment agreements in the last 12 months** **No zero/nominal income in the last 12 months** The following Criteria is applicable to all Conditions contained in this report: **HAP Renewal Contract, Section 8:** The Renewal Contract shall be construed and administered in accordance with all statutory requirements, and with all HUD regulations and other requirements, including changes in HUD regulations and other requirements during the term of the Renewal Contract.		

Sample Conditions & Corrective Actions

Condition: File missing adequate third-party verification,

                Units XYZ: Direct Express, Wages ending and checking 6 month balance.

Criteria: HUD Handbook 4350.3, REV-1, CHG-4, Chapter 5, Paragraphs 5-12A, "Owners must verify all income, assets, expenses, deductions, family characteristics, and circumstances that affect family eligibility or level of assistance." 5-13 "Owners must use verification methods that are acceptable to HUD. The owner is responsible for determining if the verification documentation is adequate and credible." and Exhibit 5-2A1.

Cause: OA failed to obtain proper verification.

Effect: HAP payment and tenant rent may be incorrect.

Corrective

Action: **Obtain missing third-party verification for current certification. If inconsistent information is noted when third-party verification is received, recalculate rent retroactively. Reimburse any HAP collected in error by processing a corrected certification. However, tenant may not be charged retroactively for any calculation error made by management. Provide the date corrected 50059 was submitted to TRACS if needed. Also, provide a copy of the third party verification received. Also confirm third party verification procedures have been reviewed with staff.**

Target Completion Date

xx/xx/xxxx

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Responses Due Every 30 days

MOR TRIVIA

True or False, if CAHI receives an appeal for an overall BA or Unsat MOR report, a quality assurance specialist or supervisor who has had no involvement with the original site visit or report drafting will review the appeal.

Answer:

True. CAHI will assign a reviewer who had no involvement in the original MOR visit, report writing or report review process. This may include members of our Quality Assurance team or an LCS supervisor.

Top 10 Conditions / Findings

How to prepare and/or avoid them

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Lead Paint

Lead Based Paint Compliance

Darryl C. Zeldin,[3] Pamela Broene,[2] and Warren Friedman[1]

[1]U.S. Department of Housing and Urban Development, Office of Healthy Homes and Lead Ha...; [2]Westat, Rockville, Maryland, USA; [3]Division of Intramural Research, National Institute of En... Triangle Park, North Carolina, USA

In this study we estimated the number of housing units in the United States with lead-based paint and lead-based paint hazards. We included measurements of lead in intact and deteriorated paint, interior dust, and bare soil. A nationally representative, random sample of 831 housing units was evaluated in a survey between 1998 and 2000; the units and their occupants did not differ significantly from nationwide characteristics. Results indicate that 38 million housing units had lead-based paint, down from the 1990 estimate of 64 million. Twenty-four million had significant lead-based paint hazards. Of those with hazards, 1.2 million units housed low-income families (< $30,000/year) with children under 6 years of age. Although 17% of government-supported, low-income housing had hazards, 35% of all low-income housing had hazards. For households with incomes ≥ $30,000/year, 19% had hazards. Fourteen percent of all houses had significantly deteriorated lead-based paint, and 16% and 7%, respectively, had dust lead and soil lead levels above current standards of the U.S. Department of Housing and Urban Development and the U.S. Environmental Protection Agency.

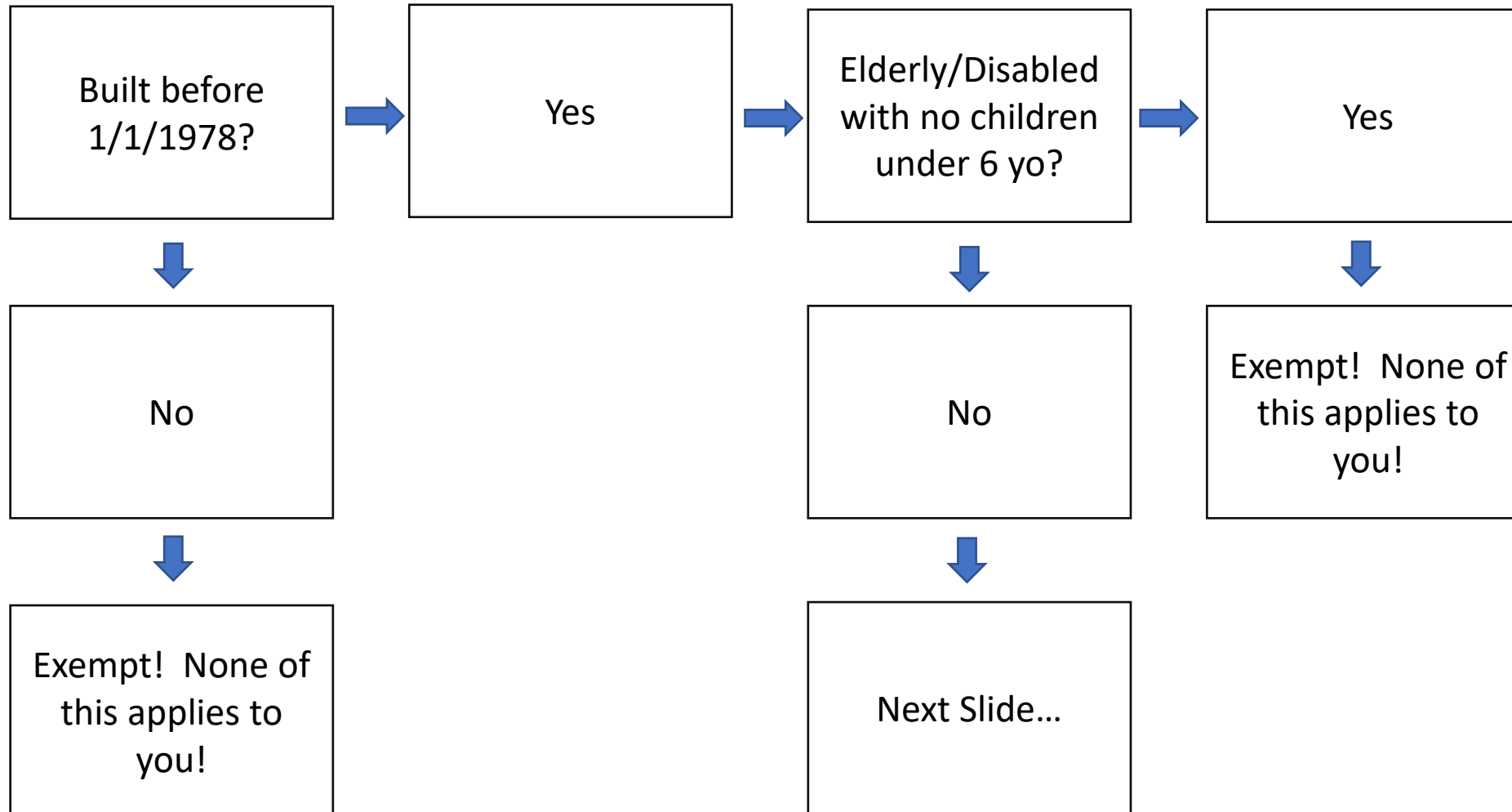California Affordable Housing Initiatives, Inc.

JJ's Story

Selena Wiley with her son J.J., who was exposed to lead paint in their rental home and treated for high levels of the toxic metal. The repercussions of lead poisoning can be lifelong. Andrea Bruce for The New York Times

https://www.nytimes.com/2022/03/29/us/lead-poisoning-insurance-landlords.html

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Does any of this even apply to my property?

| Built before 1/1/1978? | → | Yes | → | Elderly/Disabled with no children under 6 yo? | → | Yes |

↓ (from Built before 1/1/1978?)

No

↓

Exempt! None of this applies to you!

↓ (from Elderly/Disabled with no children under 6 yo?)

No

↓

Next Slide...

↓ (from Yes)

Exempt! None of this applies to you!

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Not Exempt? How can we keep kids safe?

Do you have any of these?

- Risk Assessment confirming property is exempt.
- Abatement & clearance examination confirming property is exempt.
- In some cases, a letter from HUD/Certified LBP Inspector verifying property is exempt.
- At least two consecutive biannual re-evaluations conducted without finding LBP hazards or a failure of an encapsulation or enclosure.

Then you can prove Exempt Status!

You are not Exempt, then you need to demonstrate that:

- Biannual reevaluations conducted by a certified LBP inspector/risk assessor.
- Written LBP maintenance program.
- Compliance with LHCP (must include visual inspections of LBP components annually and at each unit turn).
- Mitigation of LBP hazards when hazards are identified during reevaluations and within required timeframes.
- Completion certificates in lead-safe work practices as required by the O/A's LHCP.

Resources:

https://www.hud.gov/program_offices/healthy_homes/enforcement/bigbuy

AFHMP

F. Updating the Marketing Plan

1. The approved Affirmative Fair Housing Marketing Plan must be followed. It is the owner's blueprint for marketing activity.

2. Owners must review their Affirmative Fair Housing Marketing Plan every five years or when the local Community Development jurisdiction's Consolidated Plan is updated.

3. When reviewing the plan, the owner should look at the current demographics of the market area to determine if there have been demographic changes in the population in terms of race, ethnicity, religion, persons with disabilities and/or large families. The owner will then determine if the population least likely to apply for the housing is still the population identified in the Affirmative Fair Housing Marketing Plan, whether current advertising sources still exist, whether the advertising and publicity cited in the current Affirmative Fair Housing Marketing Plan are still the most applicable or whether advertising sources should be changed or expanded. Even if the demographics of the community have not changed, the owner should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy. If not, the Affirmative Fair Housing Marketing Plan should be updated.

4. The revised plan must be submitted to HUD for approval. HUD or the contract administrator will review whether affirmative marketing is actually being performed in accordance with the Affirmative Fair Housing Marketing Plan during an on-site monitoring review.

5. If based on their review the owner determines the Affirmative Fair Housing Marketing Plan does not need to be revised, they should maintain a file documenting what was reviewed, what was found as a result of the review, and why no change is required. HUD or the contract administrator may review this documentation during a monitoring review.
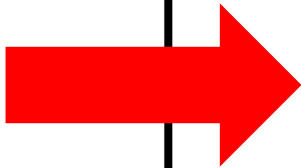
VAWA ETP

- VAWA ETP missing a statement that shows OA will allow an Internal transfer and External transfer concurrently.

- What will be done with applicants – do they have a preference or not?

- Having an ETP

Waiting Lists

- Process Applicants from your Waiting List in a timely manner

- Follow your Tenant Selection Plan

- Add notations to your Waiting List

- Ensure the printed Waiting List is provided for the MOR showing all MI, rejections, withdrawals/removals, etc.

EIV

- Not running periodic reports

- Lack of Master File

- Valid/Invalid? Resolution? Lack of documentation/notation in Master and Tenant files

Notations

Failed Verification Report | **Download Data**

Failed Verification Report for Contract: FL298023005

HOH SSN: 999-88-7777 | HOH Name: Papa Smurf | Project Number: – | Property Number: 800008888 |

Member SSN	Member Name	Error Description
999-88-7777	Papa Smurf	Verification failed – Surname matched, but date of birth did not match with SSA records 08/08/1900

HOH SSN: 777-66-5555 | HOH Name: Sweetie Pie | Project Number: – | Property Number: 800008888 |

Member SSN	Member Name	Error Description
777-66-5555	Sweetie Pie	Verification failed – SSN not found in SSA records 776665555

HOH SSN: 444-33-2222 | HOH Name: Bueller Ferris | Project Number: – | Property Number: 800008888 |

Member SSN	Member Name	Error Description
444-33-2222	Bueller Ferris	Verification failed – Date of birth matched, but surname did not match with SSA records

HOH SSN: 111-99-8888 | HOH Name: Mary Mack | Project Number: – | Property Number: 800008888 |

Member SSN	Member Name	Error Description
111-77-6666	Peter Meck	Verification failed – Date of birth matched, but surname did not match with SSA records

HOH SSN: 555-44-3333 | HOH Name: Honey Bunn | Project Number: – | Property Number: 800008888 |

Member SSN	Member Name	Error Description
222-11-0000	Sticky Bunn	Verification failed – Surname matched, but date of birth did not match with SSA records 12/12/1999

Papa Smurf – corrected DOB on 59, submitted corrected 3/1/2017.

Sweetie Pie – Previously corrected, EIV not yet updated. Refer to comments on Feb. 2017 Report.

Bueller Ferris – Name correct No correction needed

Peter Meck – Corrected last name on 59, submitted correction on 3/15/2017.

Sticky Bunn – DOB Not correct

Are these notations acceptable?

Why or Why Not?

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EIV Existing Tenant Report & Multiple Subsidy

Lack of Annual Unit Inspections

Family/Owner Summary Sheets Not Updated

Leases

- Not all adults have signed the lease

- Wrong initial lease terms

- Children that have turned 18 and are now adults

- Live-in Aide Addendum (where applicable)

- Unapproved Addenda

- California Lease Addendum pre-approved by HUD
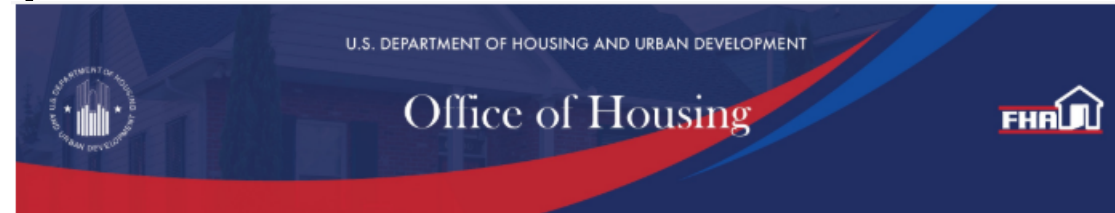
- Initialling changes

HOTMA

HUD MEMO DATED 2/6/24

- TSP must be updated for HOTMA policies **but not** implemented until TRACS 203a is released, HUD posts new documents, the site has TRACS 203a software working, and the site implements their full HOTMA policy. Their current TSP must be used until then.

- EIV P&P must be updated per HOTMA policy. **However**, O/A should continue to use EIV with their pre-HOTMA policy.

- O/A MUST not evict per the HOTMA asset limitation until the new Model Leases or posted and the family signs that new lease.

- If an O/A chooses to implement any HOTMA policy, TRACS Software will not accommodate the changes in calculations. Therefore, O/A must use the rent override feature to update the rents per their HOTMA policy and calculations.

HOTMA CONTINUED…

- **O/As that implement any HOTMA policy – must update the tenant file with all HOTMA policies implemented as per the documentation requirement listed in the Memo distributed on 2/6/2024**

- HUD continues to provide flexibility, O/A can choose to implement any of the available passbook rates. The PBCA accepts vouchers with the chosen passbook rate and the MOR reviewer will use the O/A passbook rate when calculating income from assets.

- The remainder of the variable HOTMA allowances and thresholds posted with a 1/1/25 effective date must not be used – unless the Owner is choosing to implement these. If they choose to implement – they must manually override rents in TRACS for all certifications and update the tenant file with all HOTMA policy utilized.

- HUD email dated 6/3/2025: Full Compliance 1/1/2026

HUD HQ EMAIL 6/3/2025

DRAFTING TABLE

MOR TRIVIA

True or False, AFHMPs only need to be reviewed when a site is going to open up the waiting list.

Answer:

FALSE.

Respondents must review their AFHMP every five years or when the local Community Development jurisdiction's Consolidated Plan is updated, or when there are significant changes in the demographics of the project or the local housing market area. When reviewing the plan, the respondent should consider the current demographics of the housing market area to determine if there have been demographic changes in the population in terms of race, color, national origin, religion, sex, familial status, or disability. The respondent will then determine if the population least to likely to apply for the housing is still the population identified in the AFHMP, whether the advertising and publicity cited in the current AFHMP are still appropriate, or whether advertising sources should be modified or expanded. Even if the demographics of the housing market area have not changed, the respondent should determine if the outreach currently being performed is reaching those it is intended to reach as measured by project occupancy and applicant data. If not, the AFHMP should be updated.
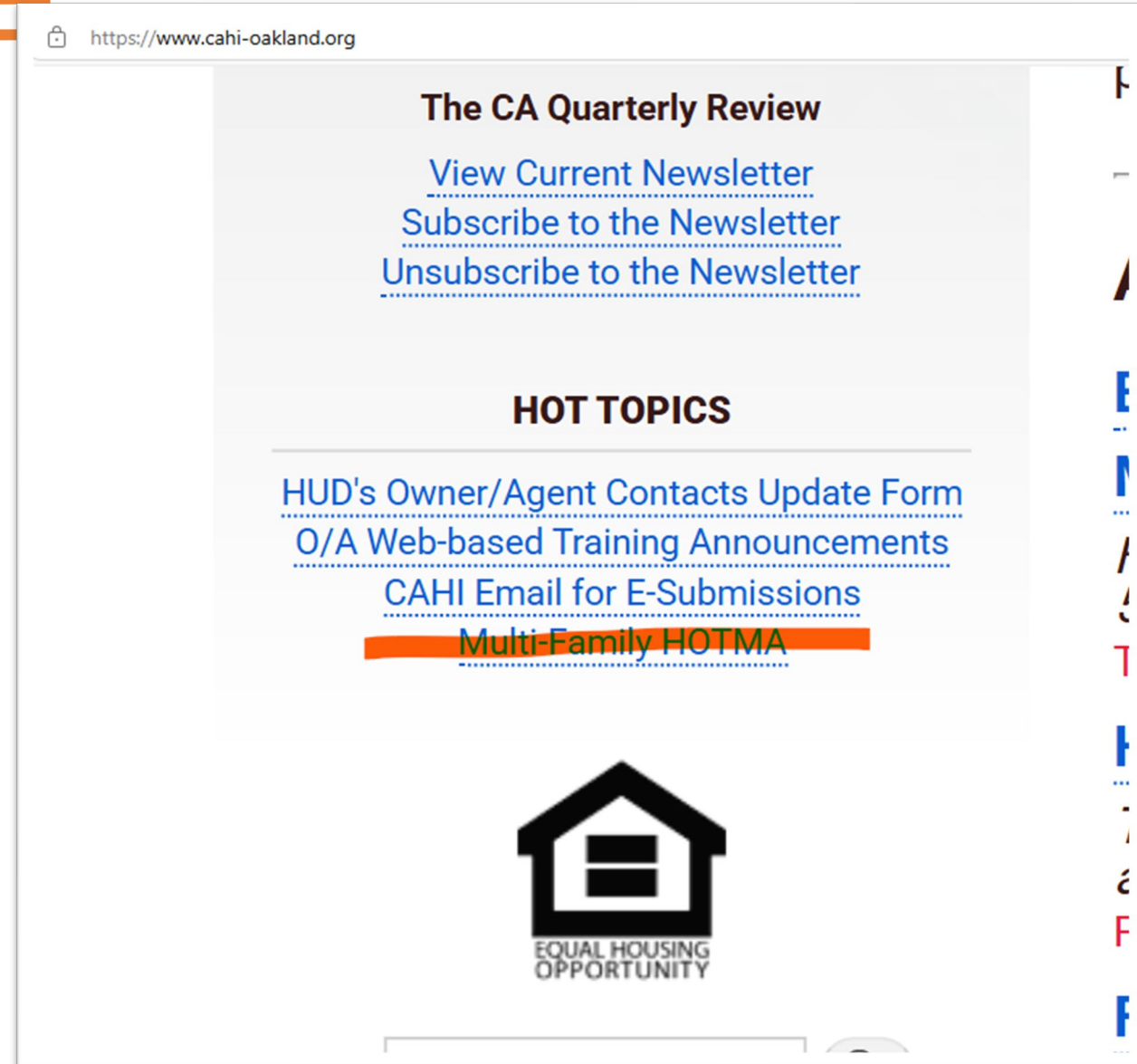
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Resources

- CAHI Website – Knowledge Center www.cahi-Oakland.org

- HUD 9834

- 4350.1 Chap 6

- 4350.3 (All Chapters, Chap 9 for EIV)

- HUD Notice 2017-05 VAWA

- 24 CFR 35 Lead Paint

- 202 MAT User Guide
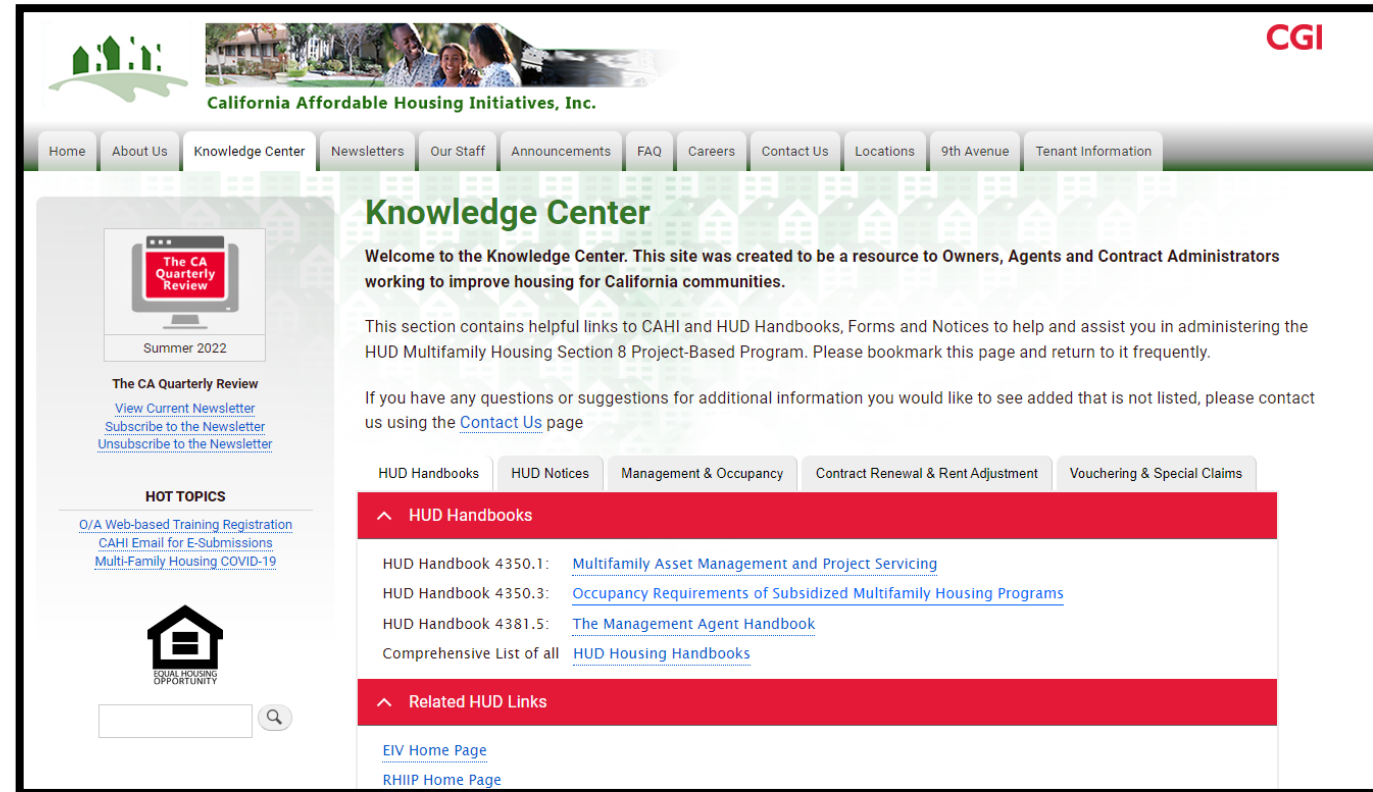
HOTMA Resources

- Link on CAHI's homepage to HUD's HOTMA resources
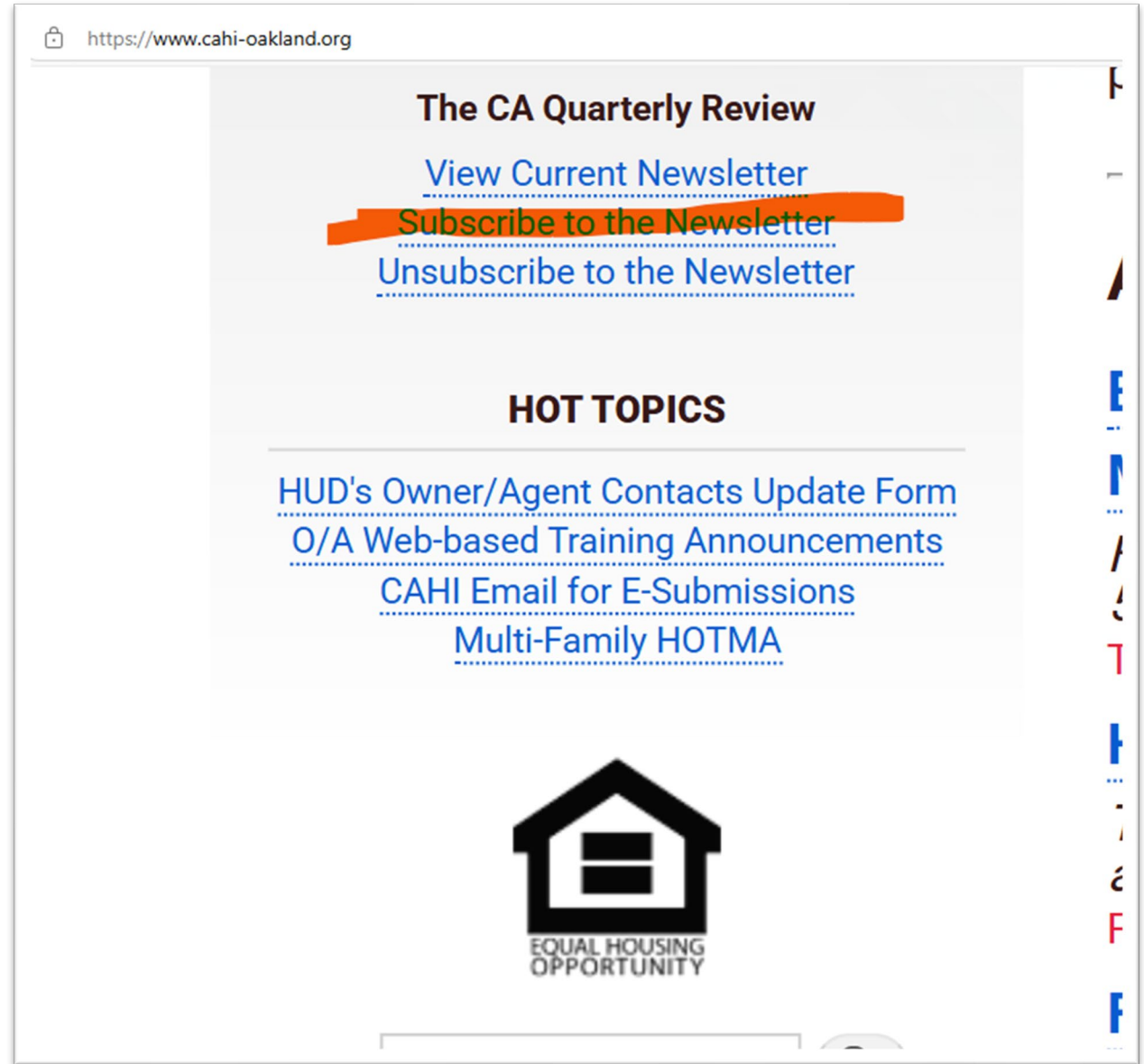
Summary & Wrap Up

- Reviewed scheduling for FY23

- Overview of MOR process
  - Scheduling notice
  - Preparation and Add C documents
  - Entrance meeting
  - On-site, activities throughout the day
  - Exit Meeting
  - Format of written report, follow up on corrective actions and appeals

- 10 Common Findings/Conditions and what to do to avoid them

- Resources

- Q&A is next!

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Do you want to receive announcements for trainings like this in the future (and other relevant info)?

QUESTIONS?

Thank you so much for attending!

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