

# \*\*\* Practical Points \*\*\*

September/October 2009

From

## PMCS-ICAP

& PAWA House Service Bureau

Services and Solutions for Properties of All Sizes

### Thank You for Making our 20<sup>th</sup> Anniversary Training and Gala a Success!

We'd like to extend our sincerest thank you to everyone who attended our 20<sup>th</sup> Anniversary Training and Gala. The sessions proved to be motivating, thought provoking and creative, just as we had hoped. As we had stated, this event was meant to be a gathering of industry friends, colleagues and clients; an event geared toward joint problem solving in an industry where keeping up with the changes isn't always so easy. The mix of Site Managers, Management Companies, Software Developers, Industry Organizations and other Service Bureaus allowed for energizing brainstorming. We plan to follow up with attendees soon, so that we can put some of our ideas into motion!

In no particular order, we'd like to thank the following industry leaders for taking the time to attend our sessions: Michael Alexander, Karen Newsome, Mike Desmond, Jed Graef, Janet Wittenberg, Dan Dulleba, Jenny Dyer, Janel Ganim, Gustavo Sapiurka, Frank Shofner, Mary Scichili, Angie Waller, Daria Jakubowski, Dave Kessler, Ken Harris, Bill Sullivan, Debbie Hixon and Sarah Upchurch. Your attendance helped us take a vision and make it a reality.

### \* Final Rule Updates \*

## Proposed Changes to the Final Rule, Effective January 31, 2010

### Amendments May Change the Final Rule

On October 15, 2009, the Federal Register published proposed amendments to the Final Rule on Income Determination. You can find it here: <http://edocket.access.gpo.gov/2009/pdf/E9-24809.pdf>.

#### What might change?

If all the proposals are confirmed, major changes will include:

- ◆ EIV: Full implementation of EIV would be required on January 31, 2010 (not just use of the Income Report for recertifications).
- ◆ Social Security Numbers:
  - Grandfathering assistance for In-place residents over age 62 who have never provided SSNs
  - SSN documentation would be expanded from just a copy of the SS card to include other documents
  - Extending the time to get SSN documentation for children under age six
  - Flexibility for management to determine the timeframe for tenant to provide documentation for new SSNs
  - Extending the time for tenants to provide SSN documentation if needed due to extenuating circumstances
- ◆ Income Calculation: The new definition of income, allowing for the use of historical income to be used on recerts in some cases, would be eliminated.
- ◆ Citizenship verification: All references to restricting assistance to non-citizens would be removed; that appears to eliminate the requirement to verify U.S. citizenship of applicants.

There is a 30-day public comment period on the proposed rule. HUD welcomes public comment on all aspects of the proposed rule and specifically requests comments on the proposed regulatory requirements pertaining to SSN disclosure.

## Where can I submit my comments and when are they due?

Comments are due by **Monday, November 16, 2009**. You can send your comments electronically or by postal mail.

Electronic submission: Go to the Federal eRulemaking Portal at [www.regulations.gov](http://www.regulations.gov). Comments submitted electronically can be viewed by other commenters and interested members of the public. Follow the instructions provided on that site to submit comments electronically.

Postal mail submission: Mail your comments to Regulations Division, Office of General Counsel, Department of Housing and Urban Development, 451 Seventh Street, SW., Room 10276, Washington, DC 20410- 0500.

**Want to find out the "final" version of the Final Rule, expected just prior to the required implementation date? Look no further!** Take one of our 90-minute Final Rule telephone training seminars in January. Contact [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com) or call Michelle Cimino at 1-800-245-7627 x1520 for more information or to register.

## \* EIV Updates \*

### EIV Security Awareness Exam

It's true! All EIV Coordinators now need to pass the Online EIV Security Exam before accessing EIV data. EIV Users will have to pass the test on March 1, 2010.

- Coordinators have 15 questions to answer.
- Users have 10 questions to answer.
- Everyone using EIV will have to pass this test (90% is the passing grade) once a year to continue to access EIV data.
- Although the test will remain in EIV (and can be printed) for a year, you should print your passing test, sign it, date it and keep it in your EIV file for MORs (Management Reviews).

Please make sure you update your current EIV Policies and Procedures to include this change. PMCS has updated its EIV Policies and Procedures to include the EIV Security Awareness Exam. If you have purchased EIV Policies and Procedures from us, we'd be more than happy to add this to your template. The cost will be \$25 for the update.

### Changes in User Reauthorization Timing

In the past, EIV Users had to be reauthorized quarterly. But when the new EIV version was released in September, this changed to twice-a-year updates! If you were reauthorized in July, you do need to reauthorize for October. Once you do, your authorization will be valid for six months.

### New EIV Rules of Behavior Now Available

HUD has (at long last) released new Rules of Behavior to be signed by people who need to view EIV data in files, but who don't retrieve it from the EIV system. These may be independent auditors, owners, management company regional managers or other personnel, Contract Administrators or Service Bureaus. Note that Rural Development and Tax Credit auditors still are not permitted to view tenant files which contain EIV printouts.

**Sites must keep these signed Rules of Behavior on file with other documents in EIV User files, for MORs.** These new Rules of Behavior are available from the EIV Home Page, or via this direct link:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>

### Other Changes in the September, 2009 EIV Version 9.0 Release

- ◆ Reports mask tenant SSNs (except for the last 4 digits) and dates of birth (except for the year)
- ◆ Deceased Tenant Report shows the date EIV received the data
- ◆ You can search the Multiple Subsidy Report by all household members, by only adult members, or by only members under age 18
- ◆ New links take you to the SAVE System and to the EIV Welcome Page with one click

## Form HUD-92006 – Supplement to Application

### What is form HUD-92006 and how does it apply to me?

The new form HUD-92006, Supplement to Application for Federally Assisted Housing, was issued on September 15, 2009. This form allows applicants to provide a contact person/organization that the manager can call upon to assist with any tenancy issues that may arise. It must be used by all project-based subsidy types (as well as public housing).

### What should I do?

The form HUD-92006 can be used now, and MUST be part of the applicant packet no later than 12/15/09. ALL applicants after that date MUST complete and return the form – if they don't want to provide an additional contact, they have to check the box on the form that says they choose not to provide it. Applicants currently on the waiting list who did not receive this form MUST receive and complete it at Move-In (so, for a while, this form should also be part of Move-In packets).

Each form (an applicant or tenant can complete more than one) specifies one person/organization and the specific purpose(s) for which the manager can contact them. Sites should (but are not required to) provide this form to ALL tenants (including current in-place residents) at the time of every AR, to allow them the opportunity to provide, change or remove such contact information.

The form must be retained with all applications for those not moving in. For residents, the form must be kept in the tenant file for the term of tenancy plus 3 years. Questions should be directed to the local HUD Field Office.

Form HUD-92006 is available from HudClips at: <http://www.hud.gov/offices/adm/hudclips/forms/>

## Notice of Funding Availability (NOFA) Due Dates Released

### What is NOFA and where can I find more information?

NOFA stands for Notice of Funding Availability. These are grants provided by HUD for properties seeking additional funding. This year, HUD has published its NOFAs separately and not in a combined SuperNOFA. The NOFAs have been posted on the HUD website at the following web address:

<http://www.hud.gov/offices/adm/grants/fundsavail.cfm>

Here is a list of due dates for the different NOFAs:

- Assisted Living Conversion Program – November 5
- Service Coordinator – November 5
- Section 202 – November 13
- Section 811 – November 16

## Refine Your Skills: Tenant Interviewing 101

Did you know there may be a more effective way for you to interview tenants? If looking for some different strategies, take some time to review the C.A.V.E. methodology. 'What does C.A.V.E. stand for?' you ask. Take a peek below:

- Collection of complete information
- Analysis of the information to determine verification requirements and to resolve discrepancies
- Verification of the information
- Education of applicants and tenants on what is required and how the program works

Collection + Analysis + Verification + Education = Correct eligibility determinations, tenant selection decisions and correct rent determinations.

HUD has issued "A Guide to Interviewing for Owners of HUD-Subsidized Multifamily Projects" to assist you in your tenant interviewing process. If you're looking for a helpful tool to strengthen your staff's interviewing skills, add the Guide to your toolbox.

The Guide is posted on the Multifamily RHIIP website at:

<http://www.hud.gov/offices/hsg/mfh//rhiip/mfhrhiip.cfm>. Watch for a PMCS Telephone Training Class on this topic soon!

## 4350.3 Rev-1 CHANGE 3 Travel Version Handbook

## 4350.3 Rev-1 Chg-3 Handbook posted on HUDCLIPS

HUD has made the 4350.3 Rev-1 Chg-3 available in Microsoft Word format as well as PDF. Every Chapter, Exhibit and Appendix is available as a separate Word or PDF document. The entire Handbook is also available on one large searchable PDF file. All of this material can be found at <http://www.hud.gov/offices/adm/hudclips/handbooks/hsg/4350.3/index.cfm>.

### PMCS 4350.3 Rev-1 Chg-3 Travel Version

Are you tired of lugging around your 4" thick Handbook? If you're not familiar with our 4350.3 Travel Version Handbook, you're in for a treat! We've taken the original handbook and fit it into a 1 1/2" inch binder! Now you can easily lift it with one hand, and bring it with you wherever you choose. This handy item is also available on a searchable CD - just type in a key word or chapter and you'll find what you're looking for in seconds!

**Our 4350.3 Travel Version (book plus CD) is available for only \$99.00 plus tax. If you prefer, you can just purchase our searchable CD for only \$50.00 plus tax. The purchase price for these items includes First Class Postage. These items are available for purchase through our website or by contacting Michelle Cimino at 1-800-245-7627 x1520.**

### Featured Service of the Month: EIV Policies and Procedures

With the Final Rule implementation date of January 31, 2010, our EIV Policies and procedures is still our featured product! It is our goal to give you access to all the tools you need to be prepared for the upcoming HUD requirements. Did you know that in order to use EIV, you must have written policies and procedures? This is one of the required items your MOR reviewer will check, once EIV becomes mandatory.

PMCS' EIV Policies and Procedures are designed to meet all HUD requirements, whether you choose our generic template or our customized version (which includes consulting to develop procedures just for you). As HUD requires, the procedures will list the EIV features you will use and how you will use them, as well as describe how you will meet technical, administrative and physical security requirements.

It's important that you and your staff are in compliance with HUD's EIV rules - and we'll make it easy to get your hands on PMCS' EIV Policies and Procedures! Just call Matt Simon at 1-800-245-7627 x1535 or email [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com). We specialize in **customization - as much or as little as you need.**

### 20th Anniversary Special 2009 Telephone Training Seminar Promotion

**Time is running out!  
Register Now**

Every 2009 Telephone Training registrant will be entered into a **GRAND PRIZE DRAWING** at the end of the year to win a VISA gift card. Every individual-class registrant will have a chance to win a \$25 gift card. There will be a drawing for four (4) \$25 gift card winners. Those who have registered for our "Six-Pack" of classes will be placed into a separate drawing and are eligible to win a \$100 gift card!

#### What are the rules?

1. If you enrolled in a PMCS telephone training seminar any date throughout 2009, you qualify. **Please note:** this does not include our upcoming list of 2010 classes.
2. Your name will be entered for every individual PMCS Telephone Training class you take. If you sign up for 4 classes during 2009, you have four entries - and four chances to win \$25!
3. If you signed up for 2 "Six-Packs", you have 2 entries and double the opportunity to win \$100 in our separate "Six-Pack" drawing!!!
4. The winner will be selected completely at random.
5. Register today for additional classes and increase your chances of winning!!! E-mail [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com) for a current class schedule.

## PMCS Telephone Training Seminars

### Some of Our Upcoming 2009 Telephone Training Seminars

#### Basics - Income/Assets/Expenses:

November 4;  
3 - 4:30 PM EST

#### 4350.3 Interactive Review:

November 5;  
3 - 4:30 PM EST

#### Where you can find us:

##### [NAHMA Fall Conference](#)

Sunday, October 18 - Tuesday, October 20

##### [NEAHMA Conference](#)

Thursday, October 22

##### [PennDel AHMA Conference](#)

Wednesday, October 28 - Thursday, October 29

##### [PAHMA Conference](#)

Thursday, October 29

#### Private Classes for Associations, Managing Agents and Contract Administrators

We can provide high-quality training for your members and staff. Any of our live and/or telephone classes may be customized to meet your specific needs. If you have a Conference or Educational Series coming up within the next year, consider bringing us in to conduct a full-day, half-day or 1-2 hour workshop session.

#### Questions about trainings?

Contact: Michelle Cimino at 800-245-7627 x1520. To request a schedule and registration form for Telephone Training Seminars, email [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com).

#### At the End of the Day...

"Autumn is a season followed immediately by looking forward to spring" ~Doug Larson

### For Further Information, Please Contact Us:

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