


Understanding HAP
Vouchers and TRACS 203A

with


Tara Appleby, INQ



Indiana Quadel Consulting 


**Owner Agent Update
Conference
April 18-19, 2017**

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Understanding HAP Vouchers

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HAP Vouchers

- Resources
- Improving Quality & Accuracy
- Understanding Variance Causes
- The Future...203A

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Voucher Resources

- HUDClips
Handbooks, Guidebooks, Notices, Forms, Income Limits, etc.
https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips
- TRACS Home Page
MAT Guide & other Documents, TRACS Industry Meeting Presentations, 203A news & documents
https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/trx/trxsum

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More Resources

- RHIIP Listserv (Rental Housing Integrity Improvement Project)
https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rhiip/mfhrhiip

Not signed up?
<http://portal.hud.gov/hudportal/HUD?src=/subscribe/maillist>


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Improving Quality & Accuracy

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Your Role

- Monitor TRACS Online Queries for certification & voucher acceptance, as well as any associated errors (via HUD's Secure Systems)
- *INQ returns all TRACS responses upon receipt*
- Check TRACS Mailbox regularly
- Research errors and submit necessary MAT files in a timely manner
- Carefully review Voucher before transmitting to INQ


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Things to Remember

- Terminated for failure to recertify on time? TE effective date = last day of month immediately preceding AR date
- Move-out date equals possession date, *not* end of 30-day notice period
- Tenant & Owner *Signed Date* must be equal to or less than the current calendar date

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MAT/TRACS Responses & Errors

Reference TRACS MAT Guide for guidance and clarification

Every property should have MAT Guide bookmarked and/or hard copy available

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MAT Level Discrepancies

Yes, MAT level discrepancies *DO* require our attention

Per TRACS MAT Guide, Appendix D:

- 01 – Submit correction within 45 days
- 02 – Submit correction on next submission &/or certification
- 03 – Informational; may or may not or require correction

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TRACS Batch Processing Order

1. MAT30 (vouchers)
2. MAT40 (move-outs)
3. MAT65 (terminations)
4. MAT10 (all full certifications, no order)
5. MAT70 (unit transfers and gross rents)

A "batch" = all records processed in a nightly run whether or not they were sent in different MAT files

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Best Practice for TRACS Acceptance


Multiple certifications for a single household or unit?

Submit certifications in separate MAT files, **AND** different Batch processing cycles, in effective date order

- Start with earliest effective date
- **Wait for TRACS processing & acceptance**
- Transmit next certification in the sequence
- Continue until last certification in sequence is processed


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Avoid Batch Processing Challenges

- Two or more MAT70's for tenant – transmit separately, in effective date order, **AND** in separate batches
- Partial certs require recalculation when new cert and/or full cert addition or correction inserted. (Partial cert TTP must match previous full cert) – MAT Guide 4.20
- Previous HOH Fields use – reference MAT Guide 4.16 (requirements & examples provided)

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
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HOH Correction

HOH SSN correction on **current certification only** – do not correct on any prior certs previously recorded in TRACS

Example: household moved in 4/1/13; most current cert in TRACS is 4/1/17 AR. All certs to date report SSN ending 1123; actual SSN is 1723

Property action: submit 4/1/17 AR correction reporting correct SSN, and with all previous HOH fields populated per original 4/1/17 AR in TRACS

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HOH with SSN = 9's


TRACS assigns and returns a T-number to be used in future submissions

Transmitting 1st cert after T-number receipt; no SSN yet:


- Report SSN as T-number
- Leave previous HOH fields blank

Transmitting 1st cert after receipt of valid SSN:

- Report valid SSN
- Populate all previous HOH fields, using T-number

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HOH Change

Example: Mac Z. Roberts, HOH, and John J. Smith, Co-Head. Most current cert in TRACS is 2/1/17 AR. Mac moves out 3/31/17.

Property Action: Process IR effective 4/1/17 listing John J. Smith as HOH, eliminating Roberts. Populate all previous HOH fields with Mac Z. Roberts, his SSN, his DOB, and effective date = 02/01/2017


TRACS deactivates prior certification & creates link between new & old certs so both display in Smith's history list.

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Special Circumstances

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UA Reimbursements

MAT Guide, 7.13(B)
If disbursement not remitted to tenant or utility provider, funds **must** be returned to HUD

Completed via negative voucher adjustment under Misc. Accounting, using code "UUTL", Unclaimed Utility Check
Comment should tie to the household (last name, unit #)

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Household Splits and/or Swaps

MAT Guide 4.6 includes several examples identifying splits and swaps, as well as processing guidance for both

MAT Guide states "household member can appear to be occupying two units simultaneously". Is explicitly approved by HUD Policy

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Household Split

Single household becomes two households

- Process MI with effective date = occupancy date member(s) took possession of new unit.
- Process IR for remaining members in existing unit. Effective date determined by HH 4350.3 REV-1, paragraphs 7-13 C and D. Always = first day month when rent changes

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Household Swap

Two existing subsidized households exchange one or more members (leaving at least one member of existing household in place)

- Process two IR's adding or removing household members as appropriate. Effective dates determined by HH 4350.3 REV-1, paragraphs 7-13 C and D
- Effective dates **may be different** if rent increases or decreases, and if tenants followed rules in reporting the changes

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Dependent with Shared Custody


MAT Guide 4.25 references this scenario as one of only two approved "double subsidy" situations

50059s for both affected properties must appropriately reference Joint Custody

- MAT10 Section 3, field 10 Special Status Code must include the appropriate *Joint Custody Code*

Dependent child without either the J or C codes is assumed to be a full-time resident

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**Change In Unit?
Which Transaction to Process**

MAT Guide 4.1
Correct certification processing is critical; not always a UT

Answering three simple questions determines which certification(s):

1. Has Project # for Household changed?
2. Has Contract # for Household changed?
3. Has actual Unit # for Household changed?

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Common Variance Causes

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Voucher Reporting Month
MAT Guide, Appendix H

ALL Subsidies except RAP / Rent Sup		
Certification Type	Effective Aug 1st	Effective Aug 2nd - 31st
Final Possible Voucher Month		
AR	Aug (current Mo.)	N/A
IR	Aug (current Mo.)	Oct (+2 Mo.)
IC	Aug (current Mo.)	Oct (+2 Mo.)
MI	Sep (+1 Mo.)	Oct (+2 Mo.)
MO	Sep (+1 Mo.)	Oct (+2 Mo.)
TM	Sep (+1 Mo.)	Oct (+2 Mo.)
GR	Aug (current Mo.)	Sep (+1 Mo.)
LT	Sep (+1 Mo.)	Oct (+2 Mo.)

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More on Voucher Reporting Month

When transmitting certs, keep the current voucher status in mind

Once voucher is approved, any cert received with same (or earlier) voucher month; systems will not generate appropriate retro-active adjustments

Example: April-17 voucher sent 3/7/17; approved with TRACS Voucher ID returned 3/17/17. Property transmits new certs on 3/27/17 with Apr-17 voucher month.

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Voucher Reporting Month and Future MO and/or TE

- Future move-outs & terminations can negatively impact your TRACS compliance %
- Smaller properties especially vulnerable
- Due to reporting month requirements, Households now "inactive" in TRACS are still included in # units receiving subsidy for current approved Voucher
- Results in less "active" certs in TRACS & lowers the compliance %

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Dual/Overlapping Subsidy

MAT Guide 4.25, and 4.3

- Two HUD-approved scenarios (Dependent Joint Custody, and Household Split/Swap)
- Beyond this, **never** allowed
- MAT Guide 4.3 discusses rules concerning MO and MI dates
- Previous property retains right of subsidy through MO date

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Dual/Overlapping Subsidy

PBCA's must not issue payment for a MI or IC until the appropriate TM or MO is received

If overlapping subsidy exists between the former and the new property, the new property must submit:

- TM using code DS for the effective date of the MI
- IC with effective date first day immediately after the prior property's MO date

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Early or Incorrect GR Implementation

- Gross Rent changes to be implemented on the first available voucher following receipt of a fully executed Rent Schedule (form HUD-92458) from the INQ RACR Specialist
- Implementation must equal effective dates on 92458
- If Contract Rent & Utility Allowances have unique effective dates, implement on two consecutive vouchers (beginning with earliest effective date)

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GR Implementation, cont.


- Full GR implementation also includes processing corrections to all previously transmitted, and TRACS recorded, certs
- MAT Guide 4.12 and 4.14 includes guidelines for GR processing

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Repayment Agreements

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Repayment Agreements

- HUD has strong mandate to track improper subsidy payments, and the repayment of those made in error
- Refer to HH 4350.3 Rev-1, 8-20 and 8-21 for requirements on EIV Discrepancies and HUD Reimbursement for overpayment of assistance
- Changes coming with 203A

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Repayment Agreements, cont.

Three possible agreement types:

1. Tenant
2. Owner
3. None* – resident signs certification(s), but refuses to sign Repayment Agreement

*Status can be changed to "Tenant" if makes payment(s)

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Repayment Agreements, cont.

- Must be reported via MAT30, Section 7 (52670-A, Part 6)
- Refer to spreadsheet 202DCalculationsForRepayment* for guidelines and specific examples of proper voucher reporting

*Found on TRACS Homepage - "TRACS 202D Final Industry Specification Documents"

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Repayment Agreement Examples

Tenant Owes \$1,000		Reversal (Initial Repayment Agreement Transaction)	Pymt with retention
Field #			
3	Head Last Name	Swanson	Swanson
4	Head First Name	Grant	Grant
5	Unit Number	103	103
6	Agreement ID	12397	12397
7	Agreement Date	3/1/2017	3/1/2017
8	Agreement Amount	1000	1000
9	Agreement Type (T, O or N)	T	T
10	Agreement Change Amount	1000	0
11	Total Payment	0	50
12	Amount Retained	0	10
13	Ending balance	1000	950
14	Amount Requested	1000	-40

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Repayment Agreements
Helpful Hints

- Email signed Repayment Agreement to INQ Voucher Specialist when reporting new Unreported Income on the Voucher
- Agreement Amount = total amount of assistance paid in error **before** any resident payment
- After the 1st month, Agreement Change Amount = \$0, unless adjustment & total assistance paid in error changes

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Repayment Agreements
More Helpful Hints

- Ending Balance = balance remaining to be paid on agreement, **after those payments included on INQ's voucher approval(s)**
- If Unreported Income entry is denied, follow INQ Voucher Specialist's instructions for next month's reporting
- May require adding a entry as if it had not been reported on a voucher before

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RA Ending Balance Discrepancy

Unit Number	423	
Tenant Name	Smith, John	
	INQ Records	Site Reported
Repay Agreement Amount	\$1,000	\$1,000
Date of Agreement	11/01/2016	11/01/2016
	ID #08241518	
Voucher Month (type MM/YYYY)	Amount	Comment
December-16	\$1,000	Original Unreported Income (UI) Amount request
January-17	(\$50)	ACCEPTED pymt of \$50
February-17	(\$50)	ACCEPTED pymt of \$50
March-17	N/A	No resident pymt
April-17	\$0	DENIED pymt of \$50 - wrong ending balance
		DENIED 2 pymts of \$50 each - wrong ending balance
		(Site reporting \$750 Ending Balance, should have been \$800)
May-17	\$0	
	\$900	Current Ending Balance

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Repayment Agreements & OA Retention

HH 4350.3 Rev-1, 8-21(B, 2)

- Owner/Agent retention of Resident Repayments must be the *lesser of* actual costs or 20% of amount received from resident
- Collection costs must be documented and provided to INQ
- Amounts retained must be deposited into the property's operating account


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The Future: 203A

TRACS version 203A needed to encompass HH 4350.3 Rev-1 new rules and MAT User Guide changes

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203A References - TRACS Homepage

HUD.GOV
U.S. Department of Housing and Urban Development
Secretary Ben Carson

Tenant Rental Assistance Certification System (TRACS)


TRACS is a HUD computer system developed to help program financial institutions serve assisted housing programs by automating the process of certifying and monitoring eligible households.

- Release Manual
- Apply for credit and processing
- Industry User Guide of TRACS Internet Application
- Supplier Guide: Mortgage Lender Or TRACS Broker
- Vendor's Information
- Documentation
 - TRACS Industry Meeting 9/11/05
 - Registration
- TRACS Industry Meeting Credit Meeting
- TRACS Release 203A Industry Specifications
- TRACS 2009
- TRACS Industry Compliance Checksheet and Financial Package
- TRACS Handbook for Priorities Hearing Code
- TRACS 2010
- TRACS 2010 Presentation
- TRACS News of Industry Clarification (11/14/11)

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203A Timeline

- 8/1/2017 – 203A MAT files processed & accepted
- 90-day transition window; HUD & CA's must accept files in both formats (202D & 203A)
- 11/1/2017 – **only 203A MAT files accepted**
- HUD has authorized CA's to establish earlier cut-off date for 202D MAT file acceptance, as needed for timely, accurate voucher processing (*INQ has established Friday, 10/13/17 for final 202D MAT file acceptance*)


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203A Timeline

Your Software Support will provide the updated product during, or before, the 90-day transition period

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203A and the MAT30 Section 7

- HUD Voucher form 5260-A part 6, now "Repayments and Escrows", includes substantial changes
- Majority relate to corresponding requirements of two "Record Types"
 - Repayment Agreement
 - Family Self Sufficiency Escrow (*new*)
- ON 3/29/17, a HOH ID code was added to the end of the record. Facilitates reporting of Repayment Agreements to EIV. Will *not* print on voucher; only appears in MAT file

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203A Summary Of Changes

- Updates related to the Rental Assistance Demonstration (RAD) program
- MAT30 updates related to deposits & withdrawals for Family Self-Sufficiency (FSS) Escrow Accounts
- New status fields for repayment agreements & FSS escrows – active, inactive, suspended, reversed, terminated, transferred, moved-out active, & moved-out inactive (203A MAT Guide, 6.8 MAT30 Section 7, field 11)


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203A Summary, cont.

- 1st 203A Voucher must contain all “active” repayment agreements for the property (Repayment Baseline)
- MAT30 updates for all related Repayment Agreement revisions & additions
- Instructional Guide for forms HUD-50059 & HUD-50059A will be updated
- TRACS updates to include new fatal MAT errors, including Repayment Agreement variances

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Preparing for 203A

- Review TRACS 203A Final Industry Specification Documents available on the TRACS Homepage (includes TRACS MAT Guide in full)
- Work with INQ Voucher Specialist to resolve any Repayment Agreement discrepancies now. **All variances between property & INQ will result in fatal Voucher error, except differences in status codes**


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