



Return of the MOR
with
Pru Dillehay, INQ



Indiana Quadel Consulting 


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

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885

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**RETURN
OF THE
MOR**

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885


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SESSION TOPICS

- UPDATES ISSUED FROM 11-2015 TO CURRENT AND HOW THEY AFFECT THE MOR
- OVERVIEW OF THE MOR PROCESS
- COMMON FINDINGS
- SUGGESTIONS TO HELP YOU

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885




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HUD NOTICE H-2015-12 - AMENDMENT TO THE DEFINITION OF TUITION

- Promotes consistency across HUD's programs and provides O/As with a standard definition of tuition and fees by aligning with the Department of Education's definition of tuition and fees
- Rather than deferring to the definition of tuition used by the institution of higher education in which the student is enrolled as was previously required, O/As must now include amounts of student financial assistance in excess of tuition and other required fees and charges when determining annual income
- Examples of required fees include, but are not limited to, writing and science lab fees and fees specific to the student's major or program


Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885

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HUD NOTICE H-2015-12 - AMENDMENT TO THE DEFINITION OF TUITION

- Expenses related to attending an institution of higher education must not be included as tuition. Examples of these expenses include, but are not limited to: room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed sum charges
- We will be reviewing the TSP. If you define the reportable student income, we will review to ensure that the current definition is stated

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885

Indiana Quadel Consulting 

HUD NOTICE H-2016-09 - STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Verification For Social Security Numbers - New Exception

- o In addition to the current exceptions to the social security number disclosure requirement of individuals who do not contend eligible immigration status or tenants who were age 62 as of 1/31/10 and whose initial eligibility determination of eligibility was begun before 1/31/10; the regulation at 24 CFR 5.216 now permits owners to accept *applicant* households that include an *applicant* family member who is under the age of 6, who does not yet have a Social Security Number (SSN) assigned to him/her, and was added to the household 6 months or less prior to the move-in date

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
Tel: 317-656-8808 | Fax: 317-656-8885



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HUD NOTICE H-2016-09 – STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Verification For Social Security Numbers – New Exception

- o The O/A must give the household 90 days from the effective date of the move-in certification to provide documentation of the SSN for the child
- o An additional 90-day period must be granted by the O/A if the failure to provide documentation of a SSN is due to circumstances that are outside the control of the household. Examples include but are not limited to: delayed processing of the SSN application by the SSA, natural disaster, fire, death in family, etc.

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Indianapolis, IN 46204
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HUD NOTICE H-2016-09 – STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Verification for Social Security Numbers – New Exception

- During this time period, the child is to be included as part of the household and will receive all of the benefits of the program in which the child is involved, including the dependent deduction
- An interim recertification must be processed once the household discloses and provides verification of the SSN for this individual
- The penalty associated with the failure to disclose and provide verification of a household member's SSN is termination of tenancy
- We will be reviewing the TSP to ensure this new exception for the verification for social security number is included

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Indianapolis, IN 46204
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HUD NOTICE H-2016-09 – STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Definition Change – Extremely Low Income

- Extremely low income families are now defined as a family whose income does not exceed the higher of 30 percent of the area median income or the federal poverty level
- O/As do not need to research or determine the federal poverty level, as all HUD-published extremely low-income dollar amounts are calculated in accordance with the new definition and are posted for each region. Basically, it is already reflected in income limits published by HUD
- We will be reviewing the TSP to ensure the definition is current

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Indianapolis, IN 46204
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HUD NOTICE H-2016-09 - STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Reexamination of Family Income and Composition

- O/As are permitted to use a streamlined income determination for any family member with a fixed source of income
- O/As have the discretion to adopt a streamlined income determination for fixed sources of income. This method may be used to adjust income on the two annual recertifications following the annual recertification (or move-in certification) in which the income was verified through third-party verification. We ask that if you choose to utilize this process, please document the file accordingly, this will avoid the appearance of missing verification
- In situations where a household has a combination of fixed income and non-fixed income, O/As can use the streamlined income determination for the fixed income and must verify all non-fixed income through third party verification

Indiana Quadel Consulting, LLC
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INDIANA QUADEL

HUD NOTICE H-2016-09 - STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Reexamination of Family Income and Composition

- For purposes of this Notice, the term "fixed income" includes income from:
 - Social Security payments, to include Supplemental Security Income (SSI) and Supplemental Disability Insurance (SSDI);
 - Federal, state, local, and private pension plans; and
 - Other periodic payments received from annuities, insurance policies, retirement funds, disability or death benefits, and other similar types of periodic payments

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INDIANA QUADEL

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Reexamination of Family Income and Composition

Year	Certification Type	Fixed Income	Non-Fixed Income	Third Party Verify
3/1/2017	Move-in Certification	Fixed Income	Non-Fixed Income	Third Party Verify
3/1/2018	Annual Recertification	Fixed Income	Non-Fixed Income	Use of Adjustment Factor Permitted
		Fixed Income	Non-Fixed Income	EIV/Third Party Verify
3/1/2019	Annual Recertification	Fixed Income	Non-Fixed Income	Use of Adjustment Factor Permitted
		Fixed Income	Non-Fixed Income	EIV/Third Party Verify
3/1/2020	Annual Recertification	Fixed Income	Non-Fixed Income	Third Party Verify
		Fixed Income	Non-Fixed Income	EIV/Third Party Verify

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HUD NOTICE H-2016-09 – STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Reexamination of Family Income and Composition

- To apply an adjustment factor (verified COLA or the current rate of interest to the previously verified or adjusted-income amount) to a fixed source of income:
- The O/A must first verify all adjustment factors from either a public source or from tenant-provided, third party generated documentation. In the absence of such verification for any source of fixed income, third-party verification of income amounts must be obtained
- Once an adjustment factor is obtained, verified, and documented in the tenant file, the O/A will then apply the applicable factor to the previously verified or adjusted income amount
- This amount is then recorded as income on the household's form HUD-50059

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HUD NOTICE H-2016-09 – STREAMLINING ADMINISTRATIVE REGULATIONS FOR MULTIFAMILY HOUSING PROGRAMS

Reexamination of Family Income and Composition

- In the years when an O/A elects to utilize the streamlined income verification process, the fixed source of income does not have to be verified using the EIV system
- The O/A may, however, use the EIV system at his/her discretion and as indicated in the property's policies and procedures; I.e., the resident reports a change in their fixed income
- All non-fixed sources of income remain subject to full income verification requirements; including EIV
- In addition to the above guidance, if the streamlined verification process is utilized, INQ will still be reviewing the file for the EIV Summary Report at each Annual Recertification. The EIV Summary Report will not be required if the file is documented showing the household members were previously verified in EIV

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
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Indiana Quadel Consulting

FR-5969-N-01 – ELIGIBILITY OF INDEPENDENT STUDENTS
Issued 9/21/2016

- The definition of independent students in HUD-assisted housing has been revised to be parallel with the Department of Education's definition of independent student to give O/As the opportunity to remove barriers preventing eligibility when a student is an orphan, ward of the court, emancipated minor or in a legal guardianship relationship with someone other than the student's parents

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
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Indiana Quadel Consulting 

FR-5969-N-01 – ELIGIBILITY OF INDEPENDENT STUDENTS

- Individuals who meet the Department of Education's definition of independent student are considered vulnerable youth. If an O/A determines an individual is a vulnerable youth, then that is all that is necessary to determine a person is an independent student for purposes of using only the student's income for determining eligibility for section 8 assistance


Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
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Indiana Quadel Consulting 

FR-5969-N-01 – ELIGIBILITY OF INDEPENDENT STUDENTS

- We will be reviewing the TSP. If you specify the US Department of Education's definition of Independent Student, it must be the current definition

Indiana Quadel Consulting, LLC
10 W. Market Street, Suite 750
Indianapolis, IN 46204
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Indiana Quadel Consulting 

FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013
Issued 11/16/2016


Critical Components of the Final Rule

- The rule codifies the core protection across all HUD's covered programs ensuring survivors are not denied assistance as an applicant, or evicted or have assistance terminated due to having been a victim of domestic violence, dating violence, sexual assault, and stalking, or for being affiliated with a victim
- Includes emergency transfers as housing protections which allows for survivors to move to another safe and available unit if they fear for their life and safety

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Indianapolis, IN 46204
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Indiana Quadel Consulting




FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

Critical Components of the Final Rule

- Ensures that covered housing providers do not deny tenancy or occupancy rights based solely on adverse factors that are a direct result of being a survivor. Domestic violence can often have negative economic and criminal consequences on a survivor. The perpetrator may take out credit cards in a survivor's name, ruining their credit history, or causing damage to survivor's property causing eviction and poor rental history. The perpetrator may force a survivor to participate in criminal activity or a survivor may be arrested as part of policies that require arresting of both parties in a domestic disturbance
- The Final Rule makes it clear that under most circumstances, a survivor need only to self-certify in order to exercise their rights under VAWA, ensuring third-party documentation does not cause a barrier in a survivor expressing their rights and receiving the protections needed to keep themselves safe
- The file rules adds victims of sexual assault

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FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

- HUD has created Microsoft Word and PDF fillable files for the four model forms included in the Final Rule. The following forms are available on HUDClips:
 - VAWA Appendix A: Notification of Occupancy Rights Under the Violence Against Women Act, form HUD-5380
 - VAWA Appendix B: Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, form HUD-5381
 - VAWA Appendix C: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation, form HUD-5382
 - VAWA Appendix D: Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, form HUD-5383

Indiana Quadel Consulting, LLC
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FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

- During the 12-month period following the effective date of the VAWA regulation, owners/agents must give each household the Notification of Occupancy Rights (HUD-5380) and Certification form (HUD-5382) either during the annual recertification or lease renewal process, or, if there will be no recertification or lease renewal for a household during the first year after the rule takes effect, through other means. The 12-month period is December 16, 2016 through December 15, 2017
- Beginning on December 16, 2016, owners/agents must provide the Notification of Occupancy Rights (HUD-5380) and Certification form (HUD-5382) with any notification of eviction or termination of assistance
- Beginning on December 16, 2016, owners/agents must provide the Notification of Occupancy Rights (HUD-5380) and Certification form (HUD-5382) to applicants when assistance is being denied or at the time the new household moves into the property
- The forms do not have to be provided to every applicant on a property's waiting list

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Indianapolis, IN 46204
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FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

- The Office of Multifamily Housing will be updating the current VAWA certification form, HUD-91066. In the meantime, owners/agents should use the Departmental form (HUD-5382)
- Owners/agents are required to develop and implement an Emergency Transfer Plan by June 14, 2017, and should use the Departmental Emergency Transfer Plan form (HUD-5381) as a guide
- Owners/agents may require tenants seeking an emergency transfer to provide a written Emergency transfer request. To facilitate this, owners/agents can provide the Departmental Request form (HUD-5383) to their tenants seeking an emergency transfer
- Multifamily Housing will be updating the VAWA Lease Addendum form, HUD-91067 in the coming months. In the meantime, continue to use the current form

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10 W. Market Street, Suite 750
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INDIANA QUADEL

FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

- During the MOR, INQ will be asking for a copy of the HUD-5380 and HUD-5382 forms and confirmation of when you are providing the forms to ensure they are being distributed appropriately
 - o Current residents during annual recertification until December 15, 2017 (if any are missed, then by other means)
 - o New move-ins
 - o Rejected Applicants
 - o Residents being evicted
 - o Residents whose assistance is being terminated
- With MORs effective June 14, 2017 and forward, INQ will be requesting a copy of the O/A VAWA Emergency Transfer Plan to ensure one is in place and that it follows HUD's Model Emergency Transfer Plan (HUD-5381)

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FR-5720-F-03 - VAWA REAUTHORIZATION ACT OF 2013

- The TSP will be reviewed to ensure the VAWA policies include the VAWA Reauthorization Act of 2013
- The TSP for MORs conducted on and after June 14, 2017 will be reviewed to ensure the unit transfer priorities include emergency transfers for persons requesting VAWA protections
- Quadel will be holding a webinar regarding the VAWA on 4/26/17 @ 2:00; registration is FREE online at Quadel.com/webinars

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- After the file review, the INQ Program Compliance Specialist will review the following EIV authorizations/documents:
 - The owner authorization letter(s) for the EIV Coordinator(s)
 - The initial hardcopy and current electronic CAAF (Coordinator Access Authorization Form) for the EIV Coordinators
 - The initial hardcopy and current electronic UAAF (User Access Authorization Form) for the EIV Users
 - The current TRACS Rules of Behavior for all persons having access to TRACS

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- The signed Rules of Behavior for persons who do not have access to EIV system but have access to the EIV information in order to perform their duties and for IPAs
- The current Cyber Security Awareness Certificates for all persons who have access to the EIV system and those who do not have access to EIV system but have access to the EIV information in order to perform their duties (the Cyber Security Awareness Certificate is not required for IPAs)
- The EIV Master Files

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Indiana Quadel Consulting 


OVERVIEW OF THE MOR PROCESS

Day of the MOR

- After review of the EIV information, the INQ Program Compliance Specialist will walk the property, follow up on a sampling of the EH&S and/or non-EH&S items listed on the last REAC inspection, and assess the readiness of up to two vacant units
 - This part of the MOR may occur earlier in the day depending on the weather. If you are aware of inclement weather arriving in the afternoon, please feel free to let us know and we will be happy to re-arrange the schedule of the day
 - If you are aware of bed bugs in a unit that is selected for the REAC follow-up or a vacant unit, please extend a courtesy and let us know. We may or may not be able to select a different unit from the REAC inspection report. Remember, this is only a follow up to check the items listed on the REAC inspection report, not a new inspection

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- o If any EH&S items are observed during the walk through, the INQ Program Compliance Specialist will provide you with a form notifying you of the issue and the date (72 hours) you must provide the completed work order showing the EH&S item has been mitigated
- After the walk through, the INQ Program Compliance Specialist will make copies from the files. The copies are for supporting findings/possible findings, for reviewing back at the office, or to support current forms/processes are now in place. Please ensure your copy machine toner is full or a replacement is on hand on the day of the MOR

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- You will be provided with a form which lists required items which the INQ Program Compliance Specialist was not able to locate in the file. Please take this opportunity to locate the items in the files as they may be in there
- o **Note:** This is not an opportunity to replicate forms which were not actually in the file. The MOR is intended to be a snapshot of that day. Forms to correct the file may be provided with the owner's response

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Indiana Quadel Consulting 

OVERVIEW OF THE MOR PROCESS


Day of the MOR

- After the copies have been made and opportunity to locate the forms not found by the INQ Program Compliance Specialist, the HUD 9834 will be completed. The HUD 9834 covers seven categories:
 - o General Maintenance and Security
 - o Follow-up
 - o Maintenance and Standard Operating Procedures
 - o Financial Management/Procurement
 - o Leasing and Occupancy
 - o Tenant/Management Relations
 - o General Management Practices
- The INQ Program Compliance Specialist is not tasked with the Financial Management/Procurement section and any questions within the form that are explicitly to be completed by HUD Staff and/or Mortgagees

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- It is good practice to be familiar with the HUD 9834 form and it is best practice to complete the form prior to the MOR to allow for better preparation. It is sometimes too difficult to think of things on the fly, but if you are prepared beforehand, you will have a complete answer ready
- This is YOUR day and this is your opportunity to brag about your property and what you have done for your property

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- If you have completed a rehab/improvements of the property and/or units, please tell us what was completed
- If you have plans in place for a rehab/improvements of the property and/or units, please tell us, provide us with a copy of the scope of work
- If you have improved your security and even have a neighborhood watch, please tell us
- If you have an energy conservation plan, please tell us

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- If you have several functions throughout the year for your residents or you have organizations that provide services for your residents, please tell us
- If you have an active tenant organization, please tell us all they do for their community
- If you have a staff member who received an award or your property received an award, even if the award is within your company, please tell us

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OVERVIEW OF THE MOR PROCESS

Day of the MOR

- Once the HUD 9834 is complete, a close out session will be conducted. This is a good opportunity for dialog. Calculations can be explained, use of current forms can be determined, updates to HUD's policies/forms can be relayed. Not all items found in the files will be discussed; however, most will.
 - Calculation errors will be discussed
 - EIV issues will be discussed
 - ✦ If you are not using EIV in its entirety, you will be required to deduct the 5% penalty on the next available voucher from the 9834 MOR release date and continuing until the deficiency is cured. Once the deficiency is determined to be cured, all monies may be recouped on the next available voucher

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OVERVIEW OF THE MOR PROCESS

After the MOR

- Within 30 days from the MOR date, the completed HUD 9834 will be provided to the owner
- The overall score is determined by weighted category percentages
- This has been determined to be in the O/A favor. If one category is low, then the score may be raised by higher scores in other categories
 - For example, if the Leasing and Occupancy category results in a Satisfactory rating, Above Average and/or Superior ratings in the other categories could raise the overall rating
 - This is why it is important to tell us the little things that you think may not matter as they may have a big impact

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OVERVIEW OF THE MOR PROCESS

After the MOR

- The Owner's response is due 30 days from the date the HUD-9834 report was released
- Mailed correspondence is preferred; however, if you email the Owner's response, please utilize and retain read receipts and monitor for acceptance. Due to size limitations, the email may not be successfully transmitted or received
- Please follow the instructions listed in the "Corrective Action" of each finding. If we only ask for a confirmation, please only confirm
- If you are to make a correction to a HUD 50059, please ensure any corresponding GR HUD 50059-As are corrected as well

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OVERVIEW OF THE MOR PROCESS

After the MOR

- If the Owner's response is considered complete, a close letter will be sent by the INQ Program Compliance Specialist
- If items are still needed to close the MOR, the INQ Program Compliance Specialist will request additional information and a response will be due 15 days from the date of the letter
- Correspondence will continue until all items are satisfactorily addressed


Indiana Quadel Consulting, LLC
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COMMON FINDINGS

- Head of households, spouse, or co-heads verified as disabled were not coded as "H" on the HUD 50059 resulting in calculation errors as the \$400 allowance and verified medical expenses were not given
- For a listing of Common Findings, please refer to the attachment following the INQ MOR Presentation Website Resource

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SUGGESTIONS TO HELP YOU

- Use checklists – this will assist with eliminating missing documents
- Use calculation tapes/sheets – this will assist with determining how calculations were made
- Use Interim Recertification request forms – In order to determine the effective date of an Interim Recertification, it is critical to document when a resident reported a change
- Ensure the residents are aware of the timeframe required by you to report changes. Stating "immediately" and "as soon as you know" are not clearly defined and may be subject to inconsistent determinations of timely reporting for Interim Recertifications

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Indiana Quadel Consulting

SUGGESTIONS TO HELP YOU

- Use a date stamp – this will assist in determining when documents were received
- Use your resources – If you have others in the office, use them as a second eye
- Sign up for RHIP Listserv to stay up to date
- Review "What's New" in HUDClips regularly
- Download the HUD Handbook 4350.3 REV-1 from HUDClips
- Search for training opportunities. There are many free webinars to stay abreast of changes. Quadel is offering an AHM class June 27-29, 2017. You may register online at Quadel.com/ahm

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Contact Information

Pru Dillehay
Senior Program Compliance Specialist
MOR Department
(317) 656-8808
pdillehay@inquadel.com

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10 W. Market Street, Suite 750
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AHAIN Owner Agent Update Conference

April 18, 2017

INQ MOR Presentation Website Resources

- HUDClips

Handbooks, Guidebooks, Notices, Forms, Income Limits, etc.

https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips

MAT Guide & other Documents, TRACS Industry Meeting Presentations, 203A news and documents

https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/trx/trxsu
[m](#)

- RHIP Listserv (Rental Housing Integrity Improvement Project)

https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/rhiip/mf
[hrhiip](#)

- Not signed up?

<http://portal.hud.gov/hudportal/HUD?src=/subscribe/maillinglist>

COMMON FINDINGS

This listing is not an all-inclusive listing, it is a summary of common findings we have been seeing since the return of the MOR

- The TSPs have not been updated to conform with the updates regarding the SSN disclosure requirement, definition for extremely low income, independent student definition/eligibility determination, the regulations regarding criminal history based on arrests, and the VAWA Reauthorization Act of 2013 information
- Waiting list management is not being following in accordance with the HUD Handbook 4350.3 REV-1, Chapter 4
- The applications do not require a listing of all states where the applicant and any household members has lived and did not inquire all information needed to capture all possible special status codes which are tracked by HUD; specifically, whether a household member is a US military veteran or if the applicant is seeking housing as a result of a Presidentially declared disaster.
- When telephone numbers are listed, the information for how persons with hearing disabilities may communicate with the owner/agent is not being provided
- The Affirmative Fair Housing Marketing Plan has not been reviewed and/or approved within five years of the last review or approval
- The current electronic CAAF/UAAF forms are not being provided
- House Rules include charges which were not approved by HUD
- The files include Lease Addendums which were not approved by HUD
- EIV Master file reports are not being processed as required by HUD and/or the owner/agent's established policies
- EIV Master file reports are not notated of the outcome/resolution of issues revealed in the reports
- EIV Master File include the report details, which are to be filed in the tenant file and not the EIV Master File
- EIV Master File reports exceed three years
- Persons who longer require EIV access still have access to EIV

- Self-certifications are not being notarized or witnessed by the owner/agent
- Incorrect verification process is utilized to verify existing income. Direct verification to the third-party source is being sent in lieu of first attempting to obtain documentation from the residents; i.e. pay stubs, pension statements, etc. The files are not noted why information from the resident was not available
- SS/SSI benefit letters are included in the file in addition to the EIV reports at annual recertification. There was no documentation in the file the resident disputed the amount verified in EIV
- Verifications are not dated or are more than 120 days from the of receipt by the owner
- The income codes do not match the income received; i.e. SS/SI codes did not match the SSA benefit the resident receives
- Existing Tenant Searches that reveal an applicant is receiving assistance did not document correspondence with the apartment community where the applicant is living to coordinate a move in date
- Existing Tenant Searches are being processed for the head of household only and not for all household members
- Missing or late 90 day EIV Income reports
- Missing EIV Income/Summary/Income Discrepancy reports at annual and interim recertification
- The EIV Income Discrepancy Reports are not documented of the resolution
- Inapplicable language in Paragraphs 7b and 8c of the Family HUD Model leases are not being stricken
- The areas on pages one and two of the Section 202/8 lease including information regarding inapplicable program types are not being stricken as instructed in the document
- The race and ethnicity codes on the HUD 50059 do not match what the resident disclosed/did not disclose on the Ethnicity Data gathering form

- Applications are incomplete
- 30 day notice of rent increase/utility reimbursement decrease are not being provided as a result of the decrease to the utility allowance
- 30 day notices of rent increase do not include the required language/lease paragraph reference
- For Section 202/8 properties, the incorrect definition of disability is being utilized to verify the disability status for residents under the age of 62
- For Section 202/8 properties; residents under the age of 62 who do not require accessible unit are allowed to move in
- Income, assets, expenses listed on the application were not verified or reported on the HUD 50059
- The cash value of real estate is not being verified
- IRs are being processed for the incorrect effective date
- Lead-Based Paint Disclosure forms are inaccurately completed and signed
- Medical expenses (typically prescription expenses) are not being annualized
- A complete pet registration missing at AR
- Phone verifications are missing all required information
- The O/A written response to an appeal is missing
- Screening is not being conducted in accordance with the TSP
- Screening is being processed using the incorrect name, date of birth, SSN for the applicants
- Third-party verification forms are not being signed by the residents
- The incorrect pro-rated rent is being collected and reported on the lease
- The MO HUD 50059-A forms are missing from the move-out files
- The move-out inspections are missing from the files
- The charges listed on the security deposit disposition do not match the move-out inspection form