

# Origination of TRACS Data

## CA Changes to Site Transmissions

### Draft 1

**Summary:** HUD policy is clear that certification and voucher data must originate from the property owner/agent. The data is not to be modified or generated by the Contract Administrator (CA) before passing it on to TRACS. However it is useful to distinguish between substantive certification data (cert data) related to the household and unit and technical fields (technical data) in the MAT specification that is unrelated to the household and unit and is only there to facilitate transmissions between Owner/Agents (OAs), CAs and TRACS. Because certifications are legal documents that amend the lease, CAs may, if they wish, help a site by modifying technical data but may not (except in rare circumstances noted below) change other certification data.

#### **Introduction:**

Currently, Owner/Agents (OAs) send certification and voucher data either to Contract Administrators (CAs) or direct to TRACS. By definition, any data sent by the OA to TRACS originates with the OA. However, where a CA is involved, data flows from the OA to TRACS through the CA. Currently, CAs are involved in reviewing data for most Section 8 contracts and, in some cases, for Section 236 projects. Currently, OAs send data for other subsidy types direct to TRACS.

The question arises whether CAs or any other HUD agent have discretion to modify OA transmissions in any way before passing them on to TRACS. The answer to that question depends in part on whether we are dealing with voucher data or certification data and whether the data is substantive (information about the household, project, contract and unit) or technical (fields that support the transmission of the data but that have no meaning in terms of the lease). The former can be called cert data and the latter technical data. Technical data exists because TRACS MAT records contain fields designed to support electronic transmission and that are neither printed on a certification form nor are related to compliance or the correctness of the certification in any way. Examples are fields such as a Record Identifier, Release Version Number, Record Number and Section Indicator.

#### **Origination of Data:**

HUD Guidance is clear on the responsibility for the correction of errors as indicated in MAT Guide Chapter 7 (formerly 4350.3 Chapter 9):

#### **7-6 Contract Administrator Requirements**

- A. All Contract Administrators must support receipt of electronic transmissions of certification/recertification and voucher data from the projects they administer. The Contract Administrator may develop custom TRACS-compliant software or purchase software from commercial vendors who offer Contract Administrator versions of TRACS-compliant software packages, or make arrangements to receive transmissions through a service provider.
- B. **Contract Administrators must review and identify data errors to be corrected by the owner.** To accomplish this review and reconciliation, the Contract Administrators may request copies of supporting documentation for TRACS

transmissions, \*such as forms HUD-52670-A part 1, 2, 3, 4, 5 and 6 with original \* signatures from the projects they administer.

- C. After the owners have reviewed and corrected any errors in the data and resubmitted the information to their Contract Administrator, the Contract Administrator must electronically transmit data to HUD in the required format.
- D. Contract Administrators are not allowed to require electronic submissions from owners that go beyond TRACS data submission requirements.
- E. \*Contract Administrators should submit to HUD throughout the month, certifications/re-certifications that the contract administrator has reviewed and approved. \*
- F. These requirements apply to Contract Administrators, both Performance-Based Contract Administrators and Traditional Contract Administrators.

Under these rules the responsibility for data origination and the correction of errors clearly rests with the OA. As mentioned above, in the case of certification data, the logic behind the rules flows from the fact that a certification is a signed legal document that modifies the lease. The resident and the owner/agent are attesting to the accuracy of the information being submitted.

#### HAP Voucher Data

The voucher differs from the certification in a number of ways. As with the cert, the voucher originates with the OA. However, because of their role, CAs create a final voucher based on their audit of OA cert data. This means that a final CA voucher may be different in detail than the OA voucher.

With respect to technical data:

As a general principle, a CA may modify the Release/Version Number field (TRACS version) in any MAT record if necessary to transmit a file under a new TRACS version that was created in a prior version.

The **VCHHR** record has fields dedicated to CA use and others that may be modified by the CA. These include fields: 4-5, 7-11, 12-14, 21, 26-32.

4	<b>M</b>	Date Stamp
5	<b>M</b>	Time Stamp
7	<b>M</b>	Sender Name
8		Sender Street Address
9	<b>M</b>	Sender City Name
10		Sender State
11		Sender Zip Code
12		Number MAT30

13		Number MAT31
14	F	Number MAT35

21	<b>M</b>	Total Records Sent
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26	<b>MOC</b>	CA ID
27		Filler
28	MOC	CA Transmission Date
29	MOC	CA Software Vendor
30	MOC	CA Software Release/Version
31		Agency Defined Data
32		Filler

In addition, fields 37 and 38 are filled by the CA if it is creating a history baseline file.

37	<b>MOC</b>	Baseline Indicator
38	<b>MOC</b>	Baseline Effective Date

The **MAT30 Section 1** record (Assistance Payment Header Record) will normally be modified by the CA because the site counters are often not the same as those in a preliminary or final CA voucher.

The **MAT30 Section 2** record (Assistance Payment Summary Record) has a number of fields that may be modified or set by CAs. These include fields: 2, 7-11, 35-44, 45-50 and 51-53.

2	<b>M</b>		Record Number
7	<b>M*</b>	52670 #6.a	Total Units in Contract
8	<b>M*</b>	52670 #6.b	Number of Units Receiving Subsidy
9	<b>M*</b>	52670 #6.c	Number of Units Abated
10	<b>M*</b>	52670 #6.d	Number of Units Vacant
11	<b>M*</b>	52670 #6.e	Contracted Units Occupied by Market Rent Tenants

Note: Fields 7-11 above to be discussed and a final determination made based on TRACS edits. Similarly, fields 17 (Unit Regular Billing Count), 19 (Unit Adjusted Billing Count) and 21 (Special Claim Unit Billing Count) need discussion and a final determination.

35	<b>MOC</b>	52670 #11.a	Total Regular Payment Amount Approved by CA
36	<b>MOC</b>	52670 #11.b	Total Adjusted Payment Amount Approved by CA
37	<b>MOC</b>	52670 #11.c.i	CA Approved Unpaid Rent Special Claims Payment Amount
38	<b>MOC</b>	52670 #11.c.ii	CA Approved Tenant Damages Special Claims Payment Amount
39	<b>MOC</b>	52670 #11.c.iii	CA Approved Rent-up Vacancy Special Claims Payment Amount
40	<b>MOC</b>	52670 #11.c.iii	CA Approved Regular Vacancy Special Claims Payment Amount
41	<b>MOC</b>	52670 #11.c.iv	CA Approved Debt Service Special Claims Payment Amount
42	<b>MOC</b>	52670 #11.d	Total Amount of Miscellaneous Accounting Requests Approved by CA
43	<b>MOC</b>	52670 #11.e	Total Amount of Repayment Agreement Amounts Approved by CA
44	<b>MOC</b>	52670 #11.f	Total Voucher Amount Approved by a CA
45	<b>MOC</b>	52670 #12	Amount Applied to Mortgage
46	<b>MOC</b>	52670 #13	Amount Applied to Debts
47	<b>MOC</b>	52670 #14	Amount Paid to Project
48	<b>MOC</b>	52670 #15	Amount Released from Reserves
49	<b>MOC</b>	CA Monitor	Voucher Approved Date
50	<b>MOC</b>	CA Monitor	Amount of Correction

The following fields are to be used by site and CA software when exchanging full vouchers and by Site and CA software when transmitting to TRACS

51	<b>M</b>		Created By
52	<b>MOC</b>		Anticipated Payment Date

53	MOC		File Status
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If the site values are legal (pass MAT edits and contain valid values), CAs must pass MAT30 records of types 3 **Assistance Payment Detail Record**, 4 **Adjustments Payment Detail Record**, 5 **Approved Special Claim**, 6 **Miscellaneous Accounting Request** or 7 **Repayment Agreement** on to TRACS without alteration except that the paid amount field is set by the CA and record numbers will often be different than submitted by the OA. An exception to this rule is that CAs may force text fields to upper case. In addition, CAs may initiate sub-records so long as the requested amount field is 0 (See MAT Guide, Chapter 4, 4.39.11). CA initiated records are, of course, based on OA submitted data.

Under no circumstance may a CA modify any OA Defined data field in the header or any other voucher record.

The CA may help the OA by correcting MAT errors for fields that are unrelated to the correctness of the voucher—technical data fields. The site does not need to correct and resubmit the file if the CA does this.

### **Certification Data**

Along with full certification records, the gross rent change and other partial cert records from site software are included in the requirements above. While it is permissible for CA software to generate its own GR records as an aid in checking the site submissions, the site records must be processed and it is the site records that must be passed on to TRACS along with the OA Defined Data that allows the site software to match up any responses with the original file. CAs may either accept, reject or conditionally accept the site records but may not create and submit records generated by a source other than the OA. This ensures that site software can be used to maintain compliance with signature and other submission requirements. Any CA generated errors as a result of processing the OA's GR records are to be returned to the site per the regular 202D rules.

In some situations, a submission that is correct and compliant may fail to be recorded correctly in the TRACS database. In those cases, CAs are free to set the cert correction flag or baseline indicator if that will help in getting the transaction into TRACS. One other situation where it would be acceptable to modify actual certification data is a case where the OA can demonstrate that the data in the MAT file does not match that on the printed, signed certification and the certification is correct. In that case the CA may assist in fixing the cert data record as the signed certification controls.

A final question is whether CAs may terminate a household whose AR is more than three months past due. The rule is that CAs are to stop paying on any ARs that are in month 16 on the HAP Voucher. TRACS will issue an HQ termination for those certs soon after the start of month 16. However the CAs are not to terminate on their own. The OA is required to issue the actual termination. See question 144 in HUD's Q&A on the 4350.3 found on the RHIIP website.

With respect to technical data:

As a general principle, a CA may modify the Release/Version Number field (TRACS version) in any MAT record if necessary to transmit a file under a new TRACS version that was created in a prior version.

The **TENHR** record has fields dedicated to CA use and others that may be modified by the CA. These include fields: 4-5, 7-11, 12-13, 15-17, 25, and 30-35.

4	<b>M</b>	Date Stamp
5	<b>M</b>	Time Stamp

7	<b>M</b>	Sender Name
8		Sender Street Address
9	<b>M</b>	Sender City Name
10		Sender State
11		Sender Zip Code

12		Number MAT10
13		Number MAT15

15		Number MAT40
16		Number MAT65
17		Number MAT70

25	<b>M</b>	Total Records Sent
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30	<b>MOC</b>	Contract Administrator (CA) ID
31		Sender's iMAX ID (Formerly Sender's Telecom Address)
32	<b>MOC</b>	CA Transmission Date
33	<b>MOC</b>	CA Software Vendor
34	<b>MOC</b>	CA Software Release/Version
35		Agency Defined Data

In addition, fields 40 and 41 are filled by the CA if it is creating a history baseline file along with fields 42-44.

40	<b>MOC</b>	Baseline Indicator
41	<b>MOC</b>	Baseline Effective Date
42		Number MAT90
43		Number MAT91
44		Number MAT92

**MAT 10** records = MI, AR, IR and IC: MAT10 fields that may be modified by a CA

**Section 1 – Certification Header Record:** Fields 2, 3 and 5-8 if incorrect (do not match the printed certification)

2	<b>M</b>	Release/Version Number
3	<b>M</b>	Record Number

5	<b>M</b>	Number of Basic Records
6	<b>M</b>	Number of Family Records
7		Number of Income Records
8		Number of Asset Records

**Section 2 Basic Record:** Fields 2, 4-9 (Note—while fields 4-9 appear on the 50059, they are actually used as technical data to help TRACS link a new certification with older certs for the household) and 14-15 (if necessary to help force a correct cert into TRACS).

2	<b>M</b>	Record Number
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4	*	Previous Head ID
5	*	Active MAT10 Effective Date (formerly Previous MAT10 Effective Date)
6	*	Previous Head Last Name
7	*	Previous Head First Name
8	*	Previous Head Middle Initial
9	*	Previous Head Birth Date

14		Action Processed Code
15	<b>MOC</b>	Correction Type Code

**Section 3 Family Record:** Field 2

2	<b>M</b>	Record Number
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**Section 4 Income Record:** Field 2

2	<b>M</b>	Record Number
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**Section 5 Asset Record:** Field 2

2	<b>M</b>	Record Number
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**MAT 15 Address** Records: Fields 2 and 3. Note that a CA may leave fields 4-8 (HOH information) blank when creating a history baseline file. Also, for a CA created history baseline, field 28 (Floor Plan Identifier) and 30 (Site Building ID) may be changed.

2	<b>M</b>	Release/ Version Number
3	<b>M</b>	Record Number

**MAT 40 Move-Out** Records: Fields 2 and 3

2	<b>M</b>	Release/ Version Number
3	<b>M</b>	Record Number

**MAT65 Termination** Records: Fields 2 and 3

2	<b>M</b>	Release/ Version Number
3	<b>M</b>	Record Number

**MAT 70 Gross Rent/Utility Allowance Adjustment and Unit Transfer** records: Fields 2 and 3

2	<b>M</b>	Release/ Version Number
3	<b>M</b>	Record Number

**MAT90 series records:** Note that these records are never sent to TRACs. When a CAs initiates a History Baseline and submits appropriate Baseline Files, they create all records by definition. However the records contain OA data.

When the History Baseline is submitted by an OA or by another CA, the CA may accept or reject any MAT90 series record and may modify incorrect data in them since these records are used as an aide in setting up a new contract in the CA software.