TRACS 202D Spec Update and Implementation Issues

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Goals

- Clarify items in the spec to achieve consistent interpretation and implementation
- Identify any changes necessary to answer questions or add examples
- Avoid new requirements where possible
- New subsidy types--technically not part of the spec
  - The applicable rules must be applied for RAD, SPRAC and 811 PRA Demo
- Given limited time today, we will have follow-up calls for bigger or new items that can't be resolved today
- Please post questions/comments on the 202D forum

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General Issues

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DUNS & TIN

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DUNS Numbers and TINs

- TRACS is not currently enforcing the DUNS Number and TIN rule (Section 8, Rent Supplement, RAP & PRAC)
  - Leaving the fields blank is fine for now (do not fill with zeroes)
- TRACS will announce when the rule will be enforced

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DUNS Numbers and TINs

- If one of the two fields is filled, the other must be filled or a FATAL error is generated
- If one or both of the fields does not contain 9 digits (partially filled) a MAT error is generated
- Parent company, if there is one, may not have the same numbers as the owner

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New Income Limits

Definition

- The definition of Extremely-Low Income (ELI) has changed for the Section 8 program.
- Section 8 property managers must make sure that the new Extremely Low Income Limits are entered in site software.
- Extremely-Low Income families are now defined as low income families whose incomes do not exceed the greater of:
  - The Federal Poverty Level or
  - 30 percent of Area Median Income

ELI Income Limits = VLI

- Under the new definition there are many cases where the ELI limit = the Very Low limit
- Proposed - If ELI = VL then report household as ELI
- One consequence is that you can't calculate ELI limits for > 8 persons unless you have the poverty data

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Cert Corrections and Income Limits

- If a limit on an original cert was correct under the rules then a correction should not modify the limit
- Certs done in advance
  - Income limits on an AR or IR have little compliance impact--statistical reporting only
  - Income Eligibility—Policy clarification last year
    - If eligibility was determined using the old limits then those are to be reported especially if the household would not be eligible under the new limits
    - MI = Jan 1 but eligibility was determined on Nov 22, then prior year's limits are correct
    - There is no way to indicate this on the 50059

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What's The Point?

The whole point was to protect people in the poverty level.

In some cases, 30% of median income was less than the poverty level.

Example

- Let's say in Jackson, MS Poverty level is $11,670.00 but ELI was $10,200.00
- OA may skip someone who is at the poverty level and delay housing because the OA is trying to maintain the 40% Income Targeting requirement
- This means that a family at the poverty level is denied housing because they are "just not poor enough".

The Necessary Change

- Congress changed the definition of extremely low income so that ELI would never be less than the poverty level.
- So, for a one member household ELI should never be less than $11,670.00, but it could be more than $11,670.00.
- This ensures that families whose income is at or below the poverty level will not be skipped due to Income Targeting efforts.

What's The Point?

The HUDUser web site is correct
and that is the source
used to gauge
your compliance.

HHS

Three charts showing the poverty level in the United States;

- 48 contiguous states,
- Alaska
- Hawaii

Other Areas

- The threshold is not defined for
  - Puerto Rico,
  - American Samoa,
  - Guam etc.
- In these areas the federal office which administers the program decides whether to use the regular US numbers or something else

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48 Contiguous States

- For the 48 contiguous states, the poverty level is defined as follows:
  - 1 member = $11,670.00
  - 2 members = $15,730.00
  - 3 members = $19,790.00
  - 4 members = $23,850.00
  - 5 members = $27,910.00
  - 6 members = $31,970.00
  - 7 members = $36,030.00
  - 8 members = $40,090.00

Stop

This change does not affect eligibility of existing residents.

However, this change does affect ELI Income Targeting for multifamily project-based Section 8 programs.

Income Targeting

Section 8 properties must ensure that no less than 40% of all new assistance (MI or IC) provided in a property's fiscal year is to residents who meet the definition of an extremely-low income family.

These requirements are described in HH 4350.3 Revision 1, Change 4, Paragraph 4-25.

Publishing New ELI Income Limits

- S8 ELI published in December
- Poverty threshold numbers are published by HHS in late January
  - This means that the ELI limits will change twice a year (December 1 and late January) unless HUD and HHS coordinate the publication of their data

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HUD Guidance

- If IL goes down…
- OA may honor any current eligibility determination /unit offer even if household is now over income

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As of July 1

Compliance with the targeting requirements **must** take into account the new definition of ELI.

An owner/agent shall meet its targeting requirements through a combination of ELI admissions prior to the effective date (using the old definition) and ELI admissions after the effective date (using the new statutory definition).

Income Limits & Multiple Funding Programs

- Multiple funding programs (for example-HUD and LIHTC)
  - Some say that there is a single limit equal to the lowest of the applicable limits
  - This is not true
  - Each funding program must use and report the applicable limits
  - Eligibility determinations are a different issue and are based on being eligible for each of the individual funding programs
  - This amounts to the same thing as a single limit but with an important difference
  - Each certification form and TIC reports the limits applicable to its program

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History Baselines

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History Baselines

- Support for the History Baseline is **mandatory** for all CA and site software
- Site software is not required to generate MAT90 records at this time

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CA Software Update

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CA Software Updates

- It is important for CAs to stay current on software updates especially during the transition
- CA software version numbers—these should change with each patch/release
  - HUD relies on version numbers when researching issues
  - OAs and Site vendors do as well

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CA Errors

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Error Messages

- It is now mandatory for CAs to return all messages generated by CA software and TRACS
- This includes MAT errors

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Error Messages

- As with TRACS errors, CA software must add -CA to a MAT Error Code if it is generated by CA software
  - For Example: 17-CA
- No customization of published TRACS messages is permitted but the CA may add a CA addendum as documented in Chapter 4

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Changes to Site Data

- Data originates with the Site
- Site has the signed legal document
- CAs should either accept, reject or provisionally accept site transactions
- CAs should not initiate transactions or modify certification data
- CA leeway to modify site transmissions?
  - Technical problems with records
  - Non-technical problems that don't impact rent or eligibility
  - Problems that do impact rent or compliance

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New Subsidy Types

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New Subsidy Type 202 PRA Demo

- Proposed subsidy type for the 202 PRA Demo program
- Subsidy type = A?
- This is a 1-character field and we have used up 0-9

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MAT Guide and New Subsidy Types

- RAD
- SPRAC
- 811 PRA Demo
- To Be Done: MAT Guide update for appendix K-new subsidy types
  - Fill out the rules
  - Then, when there is consensus, edit Chapters 5 and 6 where necessary

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TRACS Processing Order

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Processing Order

1. Processes move-outs first (MAT 40)
2. Followed by terminations (MAT 65)
3. Followed by full certifications (MAT 10)
4. Followed by unit transfers (MAT 70)/gross rents. (MAT 70)

TRACS Status

TRACS considers the last partial certification processed (for the last MAT 10) to be the most current

Impact of Retroactive Submissions

- When transactions are submitted in the order they occur, things work fine.
- When retroactive transactions are submitted, problems can occur.
  - Retroactive Gross Rent Changes
  - Corrections to a prior certification
  - Retroactive Interim Certifications

Impact of Retroactive Certs

Sequence #	Cert Type	Effective	Date Submitted	Voucher	Assist. Payment
1	Move-in – MAT 10 Unit B50	1/1	1/3	February	400
2	Gross Rent – MAT 70 Unit B50	2/1	2/15	April	420
3	Unit Transfer – MAT 70 Unit B50 TO G21	4/15	4/17	June	480

TRACS View

Sequence	Unit #	Cert Type	Cert Effective	Action	Transaction Effective Date	Subsidy
3	G21	Move-in	1/1	UT	4/15	480
2	B50	Move-in	1/1	GR	2/1	420
1	B50	Move-in	1/1		1/1	400

The above represents 3 transactions that are all considered to be different instances of the **MI MAT 10**

Retroactive Corrections

A retroactive correction to a full certification or
A retroactive partial transaction
can negatively effect TRACS

Taking our Example

- MI – 1/1 – AI = $8000 Corrected AI $7592
- GR – 2/1 – AI - $8000 Corrected AI $ 7592
- UT – 4/15 – AI - $8000 Corrected AI $ 7592

Transactions will all be created automatically and will be part of the tenant TRACS file

After a Correction

Sequence	Unit #	Cert Type	Cert Effective	Action	Transaction Effective Date	Subsidy
6	B50	Move-in	1/1	GR	2/1	430
5	G21	Move-in	1/1	UT	4/15	490
4	B50	Move-in	1/1	CT	1/1	410
3	G21	Move-in	1/1	UT	4/15	480
2	B50	Move-in	1/1	GR	2/1	420
1	B50	Move-in	1/1		1/1	400

Correction Submission

Sequence	Unit #	Cert Type	Cert Effective	Action	Transaction Effective Date	Subsidy
7	G21	MI	1/1	UT	4/15 (sent 7/10)	490
6	B50	MI	1/1	GR	2/1 (sent 6/10)	430
5	G21	MI	1/1	UT	4/15 (sent 6/10)	490
4	B50	MI	1/1	CT	1/1 (sent 6/10)	410
3	G21	MI	1/1	UT	4/15 (sent 5/10)	480
2	B50	MI	1/1	GR	2/1 (sent 3/10)	420
1	B50	MI	1/1		1/1 (sent 1/10)	400

Preventative Measures

- Multiple certifications for a household in the same TRACS transmission may not give you the result you want
- Understand what is included in the Tenant file BEFORE you send it to TRACS
- CA software should be processing in effective date order so problems generally are caused when they submit to TRACS

TRACS Order of Processing

- Suppose we have a UT and a subsequent AR reported at the same time.
- AR FATALS because the unit # does not match the old one and the UT is OK
- The only way to guarantee TRACS acceptance is to
  - Transmit certs one at a time in effective date order
  - Wait for a response between transmissions

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Certifications

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Assets & Income from Assets

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Income from Asset Guidance

- Handbook rules apply now
- OGC and Policy review for months
- May receive new guidance
  - Actual income from assets
  - How entered on 50059
- Yvette

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Assets

- $0 (zero) value assets are fine but $0 value and $0 income are not

Note: Some LIHTC TICs require $0/$0 to be reported such as Direct Express Cards (asset)

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Secondary Subsidy Type

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Secondary Subsidy Type

- Secondary Subsidy Type
  - 236 Basic may not be greater than market
- HUD 92458 (Rent Schedule Low Rent Housing)
  - In clearance/expired--ideally needs a 236 Basic Rent column or instructions on how to indicate 236 Basic
  - The current form assumes that S8 contract rent = 236 Basic

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Household Split & Swap

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Split Households & Household Swaps

Split Household	Household Swap
Where a single household becomes two households	Where two existing subsidized households exchange one or more members

IR Effective Dates – Swap & Split

- Effective dates of interims determined by the rules in HH 4350.3 R1, C4, Paragraphs 7-13.C and 7-13.D
- May differ from one another depending on
  - Whether rent increases or decreases and
  - Whether residents followed the rules in reporting the changes

Household Split – Formal Definition

- Creation of a new subsidized household
- By one or more members of an existing subsidized household
- Leaving at least one member of the existing household in place

Household Split

Household splits now dealt with by:

1. Processing a move-in certification effective on the occupancy date for the household member or members establishing a new household (subsidy starts on the MI date) and
2. Processing an interim certification for the remaining household member(s) in the existing unit

Handbook Conflict

In order to resolve the conflict between the handbook rules for interim certifications and the prohibition against double dipping, HUD has clarified, in the MAT Guide, Chapter 4, when certifications should and should not be accepted.

Example – Split

- Existing Section 8 elderly household consists of Sarah Smith (HOH) and Alma Adams
- Last annual certification was effective 3/1/2014
- Alma moves in to her own unit 8/10/2014
- An interim is created for Sarah, removing Alma and Alma's income/expenses, and reducing rent effective 9/1/2014
- The MI for Alma, effective 8/10/2014, must be accepted

Household Swap – Formal Definition

- Starting with two existing subsidized households
- One or more members of a household move to the other household
- Leaving at least one member behind

Swap Continued

In some cases the move is in one direction only—only one household loses members and the other gains

In other cases the move could be in both directions—each household adds and subtracts members

Household Swap

Household swaps now dealt with by:

1. Processing two interim certifications
2. Adding or removing household members as appropriate

Example - Swap

- Existing Section 8 family household consists of Kayla Smith (HOH), Karla Smith (minor) and Dwight Adams (adult full-time student).
- Last annual certification was effective 4/1/2014.
- Dwight is going to move in with his dad Harvey in another Section 8 unit. This "swap" occurs on 7/12/2014.
- An interim is created for Kayla, removing Dwight and Dwight's deductions. A rent increase notice is sent on 7/12/2014 and the IR including the rent increase is effective 9/1/2014.
- An interim is created for Harvey, adding Dwight and Dwight's deductions, and decreasing rent effective 8/1/2014 . Since Dwight moved in to the unit on 7/12/2010, the IR including the rent decrease is effective on 8/1/2014.

Special Note

- Children in Joint Custody Arrangements
  - JK
  - CK
  - C
- Both Parents Receive HUD Subsidy
  - Only one household receives $480 dependent deduction
  - The same household claims all unearned income

Rents

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Rents

- Calculation of BMIR market rent
  - Rounding on 110% market rents--use normal HUD rounding per the rent calculation spreadsheet
- Rent Overrides
  - POAs
  - LIHTC w/ 236 or BMIR
  - PRAC failure to recertify
  - RAD rent phase-in

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POAs

- Rent Calc
  - By unit type (very low, low, moderate income) not by subsidy type
  - Section 8 rent calc is governed by the use agreement

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Example

For example: "Low-Income Tenants."

1. Current and future Tenants classified as 'occupying Low-Income units under the tenant profile, **including tenants receiving Section 8 assistance** pursuant to paragraph 9 of the Agreement shall make a Total Tenant Payment that does not exceed the lesser of
   1. 30 percent of the tenant's monthly Adjusted Income or
   2. 90 percent of the Project Specific Rent but which may not be less than 30 percent of 45 percent of median income for that area (as determined by HUD and adjusted for family size) or 90% of the Project Specific Rent"

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No SSN

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Item 44 – ID Code (SSN)

- Transmit 999999999 if any member has no SSN/TRACS ID
- If the SSN 999999999 was used for this member on a previous certification, use the TRACS ID number assigned by TRACS
- *Do not enter an ITIN (Individual Tax Identification Number) or a Social Security Benefits Claim Number.*
- MAT rules vs data entry rules

See Housing Notice 10-08 and HH 4350.3 R1, C4, Appendix 7A

SSNs

- SSNs and all 9s--don't enter as 9s if your software will translate blanks into 9s for HUD
  - Different conventions for different programs
  - Never enter the same # for all digits
  - Never enter a segment with all 0s

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No SSN for A Member

- After submitting a member record with all 9's in the SSN field, TRACS assigns a T-Number
- T-Number used in future submissions
- Must include a valid exception code

Item 45 – SSN Exception

- **C** = Does not contend eligible immigration status
- **E** = 62 or older as of January 31, 2010
  - Initial determination of eligibility was begun prior to January 31, 2010
- **M** = Member under age of 6 where disclosure of SSN is delayed for 90-180 days
  - Cannot be used at MI or IC

Don't Know TRACS ID Number?

If the T-ID is not known, it should be obtained from the Help Desk or EIV prior to submitting the change

New Code - Future

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MOs and 811 PRA Demos

- There may need to be a new MO Code for 811 PRA Demo
- On an 811 PRA Demo conference call, someone indicated that there should be a MO code for re-institutionalized. *(Someone who came out of an institution and is now returning to the same or another like institution)*
- To be determined

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GR Signature Requirements

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Special Rules - Signature Requirements for Gross Rent Changes

- All GR sent at the same time
- Even if OA does not have signatures.
- OA has 60 days to obtain signatures
- 60 days starts when the certifications are included on a voucher

For example:

- GR includes a UA change
- Resident's rent goes down effective 12/1
- Owner/agent receives approval on 11/1
- Owner/agent includes GR on the December voucher submitted on 11/10
- Owner/agent has 60 days from 11/10 to obtain all required tenant signatures

Signature Requirements – Previously Submitted MAT 10

If cert already
completed,
signed by the owner/agent and all adult household members,
and
transmitted to a Contract Administrator and/or HUD,
the certification must be corrected

Signature – Change in Tenant Rent

- *When a 50059 MAT 10 is corrected **ONLY** because a Gross Rent Change transaction changes the **utility allowance** and*
- *When there **IS AN INCREASE OR DECREASE** in **Tenant Rent**, resident signatures must be obtained within 60 days from the date the gross rent change is implemented by the owner*
- *Use Extenuating Circumstances Code - 9*

Example

- Mrs. Hall's Annual Certification (AR) is effective 12/1/2014
- The certification is completed on 11/1/2014
- The owner/agent sends the AR on 11/5/2014 with the 12/2014 voucher
- On 11/6 the owner/agent receives a new approved rent schedule increasing rent for all the units
- This rent schedule also includes a utility allowance reduction
- The effective date of the rent change (GR/UA) is 12/1/2014
- The owner/agent applies the GR on 11/15/2014
- The software will not create a 50059-A GR for Mrs. Hall; rather, the software will correct the AR and incorporate the new rent and UA.
- This creates a corrected 50059 AR for Mrs. Hall (an anyone else with a 12/1 effective date)
- As with all certifications the owner/agent must sign the correction certification
- Because there is a tenant rent increase, Mrs. Hall must sign the corrected AR within 60 days
- The GR and corrected 12/1 certifications are all sent on 1/5/2015
- The owner/agent must provide Mrs. Hall with a copy of the 50059

Signature – No Change in Rent

*When a 50059 MAT 10 is corrected **ONLY** because a Gross Rent Change transaction changes the contract **rent** and when there is **NO CHANGE** in **TTP, Tenant Rent or UA**, there is no tenant signature required.*

Example

- Mr. Kelly's Annual Certification (AR) is effective 10/1/2014
- Certification completed on 9/1/2014
- OA sends the AR on 9/5/2014 with the 10/2014 voucher
- On 9/30 OA receives new approved rent schedule increasing rent
- Effective date of the rent change (GR) is 10/1/2014
- OA applies the GR on 9/30/2014
- For all certifications effective 10/1 *(like the AR above)* software
  - Will not create 50059-A GR;
  - Will correct AR and incorporate new rent
- This creates a corrected 50059
- When only change is rent change
  - Owner/agent must sign the certification
  - Mr. Kelly is not required to sign
- OA must provide Mr. Kelly with copy of the 50059

CA Processing & HAP Vouchers

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Voucher Submission

- End of paper submission
  - At the end of the transition to 202D or earlier at CA discretion

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CA Vouchers

- CA vouchers must be returned to sites and sent to TRACS
  - Returning a Final voucher is not optional
  - Returning a Preliminary voucher is optional
    - Note: Preliminary vouchers are not sent to TRACS
- Section 2 totals fields (cover page totals) = the sum of sub-record amounts for both site requested and CA paid amounts
- If the CA makes up a record, by definition the requested amount = 0
  - For example: CA Initiated Claims and Miscellaneous Accounting Requests

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CA Vouchers

- Voucher MAT30 Sub-Record Structures
  - Stuff: Requested Amount: Paid Amount
- 1 vs 2 record returns (4.39.2 in the MAT Guide)
- The rule is that if OA Stuff matches CA Stuff then there is a 1 record return
  - Examples:
    - OA Stuff: 325: 325
    - OA Stuff: 325: 123
    - OA Stuff: 325: 700
    - OA Stuff: 325: 0

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CA Vouchers

- In addition, if the CA initiates a record (no OA record) then there is a 1 record return
  - The most common example would be a Miscellaneous Accounting Request type FORQ but could also be something like a CA paying for a unit not billed for by the site
  - CA Stuff: 0: 276

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CA Vouchers

- However, if OA Stuff does not match CA Stuff (could be a difference in only 1 field out of several) then we have a 2 record return
  - OA Stuff: OA Requested Amount: 0
    - This must be done so that the Section 2 record site billed totals match the sums of the sub-records
  - CA Stuff: 0, CA Paid Amount
- An example would be the site billing for Unit 1, Smith, AR for 100 and the CA paying for Unit 1, Smith, AR* for 100
  - OA Stuff: 100: 0
  - CA Stuff: 0: 100

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CA Vouchers

- OA Defined Data and 2 record returns
  - The OA record is returned with OA data filled as submitted
  - The CA record does not fill the OA data field (leaves it blank)
  - This helps distinguish the two records
  - Example
    - OA Stuff: 23: 0: OA Data
    - CA Stuff: 0: 33: (Blank)

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Final Voucher to OA

- Voucher Reconciliation Report is still required – CAs DO NOT STOP under new model
- MAT 30 record returned
- What is site software doing with the data
- CA's need to know

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Miscellaneous Acct Requests

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New Misc. Accounting Request Codes

- **RGRC** = Adjustment for a Retroactive GRC that includes a UA decrease
- **UUTL** = Unclaimed Utility Check
- **RSPC** = Recouped Special Claims Funds
- **CEAD** = Contract Expiration Adjustment
- **EIVP** = EIV Penalty. 5% of the voucher is subtracted to cover EIV noncompliance when applicable
- **RESR** = Residual Receipts. Used to offset part of the voucher billing

Old Notices

MAT Guide
overrides all HUD notices
concerning how we handle
repayment agreements,
EIV penalties and
Residual Receipts.

Can't enforce old notices.

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RGRC - Retroactive Gross Rent Changes

Utility Allowance Reductions
Retroactive Rent Increase

- Some cases where annual rent review results in reduction in utility allowance
- Resident rent payment will increase
- In accordance with the lease, the resident must be provided with 30-day notice

How RGRC Is Used

- Usually, GR is complete before effective date
- Required notices are provided in compliance with lease
- In rare cases, formal approval may not be obtained in time for the owner/agent to provide notice

- Assuming complete owner/agent compliance with HUD's notice requirements, the owner/agent will "remain whole" until notice period is complete
- Retroactive adjustments caused by the UA decrease can be reversed

UUTL - Unclaimed UA Payments

~~HH4350.3, 9-13.B says~~

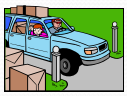
MAT Guide

"If the utility reimbursement is not disbursed to the tenant or utility provider (e.g., tenant never picks up the check, tenant never cashes the check or tenant moves-out), the funds must be returned to HUD."

UA Adjustments Negative Renters

A MO adjustment for a unit with a negative rent will automatically return some of the utility reimbursement to HUD

OA may want to recapture the proper amount with a miscellaneous accounting request on the voucher



New or No Clarification

- Cannot use SD to offset adjustment
- Can charge former resident (Deposit Reconciliation)
- Cannot use returned amount for other purposes
- May or may not be able to use UUTL to offset adjustment
- May be able to prorate payment if 30-day notice has been provided
- Yvette

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RSPC

- Miscellaneous Accounting Request Code to allow owner/agents to return Special Claims payments to HUD
- When resident does not pay for rent or damages, OA can apply for a Special Claim
- Part of the process is for OA to attempt to collect the amount through a collection agency.
- In some cases, the resident will return to pay the owner/agent
- When this happens, use RSPC code to return some or all of the money to HUD

RESR - Residual Receipts

- Prior to 202D, used the FORQ Miscellaneous Accounting Request Code to perform this task
- Implementation of 202D replaces that instruction. Owner/Agents will now use RESR

See Notice H 2012-14

Repayment Agreements

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Repayment Agreements

- Repayment Agreements
  - Any subsidy due to HUD via a repayment agreement is reported through a MAT30, Section 7 record
  - It does not matter if information causing the agreement was discovered-EIV or not

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Repayment Agreements

- Original Amount = Original Amount of Misreporting.
- Not necessarily the amount on the original agreement if it recorded only the balance after a lump sum payment

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Repayment Agreements

- Modifying/Correcting the amount of an agreement- original amount entered incorrectly but all adjustments were correct.
  - Do not fill in an agreement change amount.
  - Applies only to preexisting agreements or agreements where all adjustments were correct.
  - The adjustments have long since been done and there are no new ones associated with the agreement.

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Repayment Agreements for Schedule of Tenant Assistance Payments Due

U.S. Department of Housing and Urban Development
Office of Housing
Federal Housing Commissioner

OMB Approval No. xxxx-xxxx
(xx/xx/xxxx)

Before completing this form, read and follow the instructions in the Monthly Activity Transmission (MAT) User's Guide. See the statements on the form HUD-52670 information on public burden.

1. Asst. Pymts Due For (mm/yyyy):	2. Project Name:	3. FHA / EH / Non-Insured Proj. No:	4. Section 8 / PAC / PRAC Contract No:	5. Type of Subsidy:
10/2014				

6. Head of Household Name (Last, First)	7. Unit Number	8. Agreement ID	9. Agreement Date	10. Agreement Type	11. Agreement Amount	12. Agreement Change Amount	13. Total Payment	14. Ending Balance	15. Amount Retained	16a. Amount Requested	16b. Approved (HUD/CA use only)
Kraft, Kylie	116	1431	2/1/2014	T	1000	0	50	600	10	-40	
Saunders, Sandra	1023	888888	8/1/2014	T	3511	3511	138	3235	0	3235	
Mitchell, Michelle	401	14321	9/1/2014	T	1860	0	100	1760	0	-100	
								17. Totals for this page			

Previous editions are obsolete

Page ___ of ___

form HUD-52670-A part 6 (10/2012)
ref. Handbook 4350.3 Rev. 1

Repayment Agreements

Note: The adjustments that contribute to the agreement amount may not all be on the same voucher

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Issues

- Corrections never entered in site software
- Subsequent corrections causing adjustment discrepancies
- CA/Site rules
  - Not established?
  - Not enforced?
- What is the solution???

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Corrected Certs

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Corrected Certifications

- Corrections where the CA or TRACS does not have the original
- See 4.39.2--CAs must accept (as does TRACS) a full or partial certification marked as a correction even in cases where the CA does not have a corresponding original certification (not marked as a correction).

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Corrected Certifications

- TRACS will return a message saying that a correction was recorded even though the original certification was not found--CE251.
- This is acceptable and does not need to be addressed by the owner/agent even though the discrepancy is displayed on the Certifications with Discrepancies page.

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Corrected Certifications

A correction is in the eye of the beholder.
What is a correction for a CA may not be one for TRACS
and
what is one from a site software point of view
might not be for a CA

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Corrected Certifications

- Correction indicator for partials now determines whether a retransmitted partial is accepted or not
- This is no longer decided by checking to see if any data is different

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UT MAT 10 Combination?

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Miscellaneous

- When a UT is the prior cert a UT-O adjustment row is ok
- Vacant and Market Units on the Voucher-the only time these should appear in regular tenant assistance is for a MO or TM in the first billing cycle after the event-the way the paper form has always worked
- Either 1 or 2 rows is ok if you have a MI after the TM or MO

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Proposed Final Rule - New Subsidy Types

Heads Up

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New Fed Reg Notice Proposed Rule

24 CFR Parts 891 and 892

[Docket No. FR–5576–P–01]

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Supportive Housing and Services for the Elderly and Persons With Disabilities: Implementing Statutory Reforms

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Changed and New PRAC Regs

- PRAC proposed rule—comments due in December
- ePRAC = Enhanced Project Rental Assistance Contracts 202 & 811--will likely need new subsidy types--B & C
  - Vacancy claims at 80%
  - Frail Elderly
  - Functional Limitations
  - Revised disabled definition F--adding "under the age of 62“ to over the age of 18
  - Replaces the term “handicapped” with “disabled”

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MAT Guide and New Subsidy Types

- To Be Done: MAT Guide update for appendix K--new subsidy types
  - Fill out the rules
  - Then, when there is consensus, edit Chapters 5 and 6 where necessary

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Thank You!

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