



OHIO HUB CONNECTOR

Keeping HUD Partners Connected

Summer 2009

Security of EIV Data

By Vera Howard

As of July 17, 2006, Owners/Agents have been able to obtain access authorization rights to the Enterprise Income Verification (EIV) system. The Department considers the EIV system an integral component in the Rental Housing Integrity Improvement Project (RHIIIP) initiative to reduce errors and improper payments in the administration of its public and assisted housing programs. Full implementation of the EIV system will increase the accuracy of rent and income determinations, thereby better ensuring that the right benefits go to the right persons.

Owners/Agents should review internal policies for the security of EIV data. EIV data must only be used for income verification for existing tenants and must not be disclosed in any way that would violate the privacy of the individuals represented in the system. The data in EIV con-

tains personal information on individual tenants that is covered by the Privacy Act of 1974. This information may only be used for limited official purposes by Owners/Agents for verifying tenant employment and income recertifications, by HUD Contract Administrators for monitoring and oversight of the tenant recertification process and by Office of Inspector General investigators for investigative purposes. Official use does **not** include sharing the information with governmental entities not involved in the recertification process used for HUD's assisted housing programs (e.g. Rural Development or Ohio Housing Finance Agency).

The Department has a computer matching agreement with Health and Human Services and the Social Security Administration. Disclosing the EIV information to Owners/Agents for use under the Low Income Housing Tax Credit and Rural

Housing Service Section 515 programs is not allowable since neither the Internal Revenue Service nor Rural Housing Service are a party to the computer matching agreements. The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs does not then permit that agency to use or view information from the EIV system.

It is imperative that all users implement measures for safeguarding sensitive tenant information. Violations of the Privacy Act may result in civil or criminal prosecution.

Additional information can be found on the following websites:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>

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

<http://www.hud.gov/webcasts/archives/multifamily.cfm>

Special points of interest:

- Common Errors found on AFHM forms.
- Authorized uses of Residual Receipts Accounts
- HUD processing to get "Lean"
- Properties with Loan Management Set Aside Contracts

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New Fees for Third Party Verification

By Janice O'Dell

The Columbus Hub has been advised by the Social Security Administration that effective May 01, 2009 all Social Security offices will begin charging a fee of \$46.00 in relation to providing third party verification. A letter from the Social Security office will be mailed to agencies who frequently request third party verification informing them of this charge.

The implementation of this fee underscores the need to sign up to use the Enterprise Income Verification (EIV) system for third party income verification. It has already been announced that EIV will become a manda-

tory method for verifying income effective September 30, 2009. If agents have not yet completed the process of gaining access to EIV, it is advised that they follow the instruction found at <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivhome.cfm>. Also, helpful information regarding EIV is available at the RHIIIP home page at <http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>

The Social Security Administration and HUD recognize that new recipients of housing assistance may not be able to have their information verified through EIV. Therefore, becom-

ing familiar with and utilizing alternative methods of verification will continue to be required. Please note that a copy of income information for those who are not able to be verified through EIV can be requested through www.socialsecurity.gov. An applicant or agency assisting an applicant can request a copy of the Social Security information via the internet and will receive this information at the address of record within 10 days. The request can be performed at any computer with internet access. The HUD Handbook 4350.3 Rev. Appendix 3 also provides a listing and "how to" for obtaining acceptable third party verifications.

By Janice O'Dell

The Rental Housing Integrity Improvement Project (RHIIP) provides an invaluable service by emailing updates concerning changes in policy and procedures, news, information, and occupancy tips in an effort to help reduce errors in rent determinations and subsidy calculations. Following is a recap of recent notifications with the RHIIP Listserv number and a summary of the changes.

Listserv 147 and 149: Provided information related to changes in the Section 8 Renewal Guide. The most notable change was the increase in distributions allowed Limited Partnership owners who renew under an Option 2- Rents at or Below Comparables. There are two requirements; 1) the owner needs to enter into a long term Housing Assistance Contract- 20 year term and 2) the property must maintain no less than a 60 on the physical inspection (REAC).

Listserv 148: Provided information to access the Enterprise Income Verification (EIV) system. A detailed PowerPoint and other useful information regarding EIV can be found at <http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm>

Listserv 146: Provided information to interested parties willing to share input on the collection of data related to tenant data for Tax Credit properties. The CFR requesting input can be found at <http://edocket.access.gpo.gov/2009/pdf/E9-7041.pdf>.

Listserv 145: Provided owner and agent with delay information related to the final rule regarding the Refinement of Income and Rent Determination. The final rule, which was published January 27, 2009, provided information related to the collection of Social Security numbers, income projection of tenants/applicants, and EIV. All requirements are set forth in the Final Rule including EIV becoming

mandatory if it is effective September 30, 2009. The final rule and delay information can be found at <http://edocket.access.gpo.gov/2009/pdf/E9-1248.pdf> and <http://edocket.access.gpo.gov/2009/pdf/E9-6942.pdf>.

Listserv 144: Provided information to owners whose fiscal year ended on 12/31/2008. These owners were provided an extension of 30 days to submit their Annual Financial information to REAC. The new due date was April 30, 2009.

These notices address a wide range of information. It is important for all owners and agents to sign up for these notifications. Please do so the RHIIP home page <http://www.hud.gov/offices/hsg/mfh/rhiip/mfhrhiip.cfm> Archived Listserv notifications can also be accessed at this page.

Smoking and Use of Oxygen in Units

By Lowell Carpenter & Brenda Blaies

There is inherent danger in using oxygen in residential units. Ensuring that proper safety and security measures are in effect at all area properties receiving HUD assistance is the responsibility of the Department. Recently, office staff has elevated concerns regarding the lack of such oversight. These concerns include the lack of proper notice on front doors notifying anyone that oxygen is in use or stored and tenants/visitors who continue to smoke in units when oxygen is in use or stored. In extreme cases, fires have occurred due to smoking in units where oxygen was in use or stored.

HUD recommends that rules and regulations regarding the use of oxygen in units be disseminated to all tenants, and be enforced. Many times, this information is part of a property's house rules, although having house rules is up to the discretion of each individual owner. Any house rules adopted must be consistent with HUD requirements for operating HUD

subsidized projects, must be reasonable, and must not infringe on tenants' civil rights. While HUD does not require owners to develop a policy incorporating all elements of the Ohio State Fire Code in their house rules, it is strongly recommended that some language be included based on the regulations below:

Ohio State Fire Code 1301; 7-7-24 (article 24) compressed gases.

Section B, item 9, F-2401.9 states "All compressed gas cylinders in storage or in service shall be adequately secured to prevent falling or being knocked over".

Section H, item 1, F-307.1 states "A person shall not take or use an open flame or light into any structure, building, barn, vessel, boat or any other place where highly flammable combustible or explosive material is used or stored".

Section F-312.1 General states "The smoking or carrying of a lighted pipe, cigar, cigarette or tobacco in any form is prohibited in the areas herein provided.

Section (3) F-312.3 states "No smoking signs: The code official is empowered and authorized to order the owner or occupant to post no smoking signs in each building, structure, room, or place in which smoking shall be prohibited".

Section (4) F-312.4 states "Removal of signs prohibited: It shall be unlawful for any person to obscure, remove deface, mutilate or destroy a posted no smoking sign".

Section (5) F-312.5 Compliance with no smoking signs: It shall be unlawful for any person to smoke, throw, or deposit any lighted or smoldering substance in any place where no smoking signs are posted.

HUD's mission is to provide "decent, safe, and sanitary" affordable housing. With careful administration, all residents can be safe.



By Lois Wright

The Affirmative Fair Housing Marketing Plan (AFHMP), HUD 935.2A(7/2008) is a HUD Fair Housing document that is completed for all new properties. It should be updated every five years or when major changes in the components of the property have changed, such as: unit size, ownership and/or management agent, or when there is a definitive change in the racial demographics of the market. When creating, or updating, make certain that the correct AFHMP form is being used. You may visit our web site at www.hudclips.org to obtain a fillable form.

Forms for properties located in counties under the jurisdiction of Cincinnati and Columbus should be mailed to the Cincinnati Area Office, 632 Vine Street, Cincinnati, Ohio 45202 for initial processing. Plans are then forwarded to Fair Housing and Equal Opportunity in the Columbus Office for final approval.

To avoid processing delays, below are common errors found in submissions. Many of these errors are identified when plans are cross checked with the Integrated Real Estate Management System (iREMS), an internal HUD database. Following are the areas with the most frequent inconsistencies. Preparers should pay particular attention to these sections:

1a. The telephone number of the ownership is omitted. Also, the name of the management agent must be noted in this section.

1d. Properties which have a mix of subsidized and market rate units must account for all units, not only the subsidized units.

1e. Rental rates must agree with those given in iREMS. A copy of the rent schedule can be submitted if the property recently received a rent increase.

1g. This is frequently left blank at one or both sections. It is acceptable to indicate [As Needed] as needed.

1i. The Census Tract Code is often omitted or incorrect. It is associated with the county in which the property is located and can be obtained from the Census Geocode website, www.ffiec.gov.

2. Often, the [Reason for Update] is left blank. Also, if the county is mixed, indicate what percentage of minority residents live in the area. You can obtain this information from www.ffiec.gov, by typing in the address of the property.

4a. There should always be some type of method used to solicit for vacancies. Outreach should focus on the eligible group least likely to apply for housing.

4b(1). If [Yes] is indicated, a copy of the brochure or any handout material must

be included in the submission.

4b(2). If [Yes] is indicated, the size of the project sign and a photograph of the sign must be included in the submission.

4c. All columns must be completed. Often, indications pertaining to the Group Identification and Date are omitted. Acceptable plans usually indicate "All" or "Mixed" for the Group, and "As Needed" or a time period such as "Annually" or "Monthly" for the date. All required telephone numbers must be listed. Also, a copy of the correspondence that is included must be mailed to group/organization that is listed.

6b. All training that is going to be given, or has been given, on Federal, State and Local Fair Housing must be described. If training has been given by an institution such as NAHMA, MAHMA, COS, or another, a copy of the certificate of training given to the employee must be included. Finally, it is important to include a copy of the instructions that management provides to staff on fair housing.

8. Only an original signature is acceptable.

Please do not resubmit a new Affirmative Fair Housing Marketing Plan (HUD 935.2A) dated 7/2008 if one has been previously approved.

HUD Processing to get "LEAN"

By Chris Cook

HUD has recently implemented significant changes to its Section 232 program. Section 232 is an FHA-Insured loan product that covers residential health care facilities for those in need of supportive services. This includes nursing homes and assisted living facilities, or a combination of both. Section 232 may be used to finance the purchase, refinance, new construction, or substantial rehabilitation of a project.

Following a model effectively used in the automobile industry, HUD developed its LEAN process in 2008 for Section 232 applications. Previously, loans were processed under Multifamily Accelerated Processing (MAP) or Traditional Application Processing (TAP) by the local HUD Field Office. As of March 1, 2009, HUD's Office of Insured Health Care Facilities (OIHCF) will process all Section 232 applications, unless submitted to the Multifamily Hub prior to that deadline.

HUD's new LEAN process employs standardized work product and processes to obtain a consistent, timely result. The

fundamental objective is to create the most value while consuming the fewest resources. Value is defined from the customer's perspective, and processing steps are identified which create value for the customer. Unproductive and/or inconsequential stages are eliminated to allow for one-piece, standardized, continuous work flow.

The following are some of the changes implemented with the LEAN process:

1. The development of uniform checklists, statements of work for third-party work, certifications, and templates for the lenders to use in their assembly of the application package.

2. The removal of portions of the application processing requirements or documents that were duplicative or not necessary (e.g. no need to submit closing related documents that are submitted with the firm application twice, removal of forms that are not needed, development of consolidated certifications, etc).

3. The third-party appraisal requirements have been modified so that the appraisal

is a market appraisal. There is no requirement to use HUD forms, and the underwriting net operating income is not reduced by the estimated proprietary earnings.

By utilizing these and other goal-oriented procedures, the expectation is that Section 232 applications will be processed in a consistent and expeditious manner nationwide. As of the latter part of April, 24 LEAN projects have closed, with firm commitments issued for another 47 projects.



By Molly Logan

Lead is a toxic metal that was used for many years in products found in and around our homes. Lead also can be emitted into the air from motor vehicles and industrial sources, and can enter drinking water from plumbing materials. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Children six years old and under are most at risk. (<http://www.epa.gov/lead/>)

The U.S. Department of Housing & Urban Development issued the "Requirements for Notification, Evaluation and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance", published in the Federal Register on September 15, 1999. This regulation sets hazard reduction requirements that give much greater emphasis than existing regulations do concerning the reduction of lead in house dust, thus better protecting young children from the dangers associated with Lead-Based Paint (LBP).

Types of Housing covered:

- Federally-owned housing being sold
- Housing receiving a federal subsidy that is associated with the property, rather than with the occupants (project-based assistance)
- Public Housing
- Housing occupied by a family

(with young children) receiving tenant-based subsidy (such as a voucher or certificate)

- Multifamily housing for which mortgage insurance is being sought
- Housing receiving federal assistance for rehabilitation, reducing homelessness, and other specific needs
- Housing with completed construction date on or prior to January 1, 1978.

The Department's goal is to have at least 80% of those projects covered by the LBP Rule in compliance. To be in compliance the project must have had a risk assessment, or visual assessment in certain cases, have mitigated the hazards if any, and have a lead hazard control plan in place to handle any future hazards should they come about. Below you will find the current percentages for each office in the state of Ohio.

Not sure if you have properties covered by the LBP Rule? Not sure if your properties are either in/not in compliance? The HUD SharePoint portal is a valuable resource which can be utilized for all Lead-Based Paint questions. The Ohio Multifamily Hub has set up a Power Point presentation that can prompt you through various scenarios and link you to the proper documentation should you need it.

Go to the following website: <http://hudsharepoint.hud.gov/sites/main/H S N G / D A S M F H / C o l u m b u s / default.aspx>

Click on the "MF Asset Management" link located under Documents on the left side of the page. Once there, scroll

down until you come to the "Lead-Based Paint" link and click on it. From there you can access the Power Point presentation, find templates of needed documentation, and even take a LBP Visual Assessment course. Also included you'll find a listing (which is updated monthly) of projects that are not in compliance, and the items needed to bring them into compliance.

In the past, properties were covered under "The Big Buy" program and were offered free LBP Assessments. Over the years funding has become scarce and properties are no longer able to receive free assessments. Recently the Department of HUD issued the "FY08 Appropriation of the Office of Healthy Homes and Lead Hazard Control to continue the Big Buy Program for Certain Projects" notice (a copy of the official memorandum is included on SharePoint). This notice stipulated that Congress would allocate \$2 million appropriated to OHHLHC to be used for a new Big Buy Reimbursement program, in which qualifying properties could recoup monies spent on LBP Assessments. Included on the list of qualifying properties were two from Columbus and six from Cleveland (please see the notice for particular property names). The remaining properties covered by the LBP Rule are required by the Department to obtain an assessment by September 30, 2009, but will not be provided any monetary assistance or reimbursement.

You are all urged to check out the SharePoint information as soon as possible. Questions can be directed to Molly Logan via e-mail or telephone at:

Molly.E.Logan@hud.gov or (614) 469-5737 ex.8112

Percent Compliant by Servicing Site

As of April 03, 2009

<u>HUD Office</u>	Properties Not Fully In as of 10/01/2008	"In Compliance" per Management Plan	Percent "In Compliance" per Management Plan
Cincinnati	5	4	80%
Cleveland	80	61	76%
Columbus	39	31	79%
Total	124	96	77%

By Kristin Padavick

It has come to light that several owners and agents are unaware of the unique regulations governing tenant lease renewals for properties with Loan Management Set Aside (LMSA) HAP contracts. Under the LMSA program, according to 24 CFR Section 886.127, initial tenant leases are required to have 1-year terms. Subsequent leases must also have 1-year terms or be effective until the end of the property's current HAP contract, whichever is less. These guidelines were developed to give the properties maximum security, without guaranteeing subsidy past the possible expiration date of the assistance. These lease terms are different than those governing properties funded under other

programs, most notably the 202 program. However, they must be adhered to.

As background, when the Section 8 program was authorized in 1974, it allowed HUD to initiate Housing Assistance Plans (HAPs) for new construction, substantially rehabilitated, cooperative, and existing properties. Existing properties were most often given Section 8 subsidy as a way to improve weak financial situations. These contracts were called Loan Management Set Aside contracts because they were contracts "set aside" for properties already with loan management. Contracts were originally given in five year increments, with no guarantee of renewal. Most have since become one-year renewals. Renewal

contracts contain language which stipulates that all rules and policies effective at the time of the initial contract remain in force through subsequent contracts.

Most LMSA properties continue to successfully serve low income tenants with Section 8 subsidies. Many properties no longer have HUD insured mortgages. However, all properties must continue to operate under the guidelines originally imposed by HUD at the time their first LMSA contract was approved, including these unique lease terms. Owners and agents of properties with LMSA contracts are advised to review tenant lease terms to confirm that they conform to these regulations.

Authorized Uses of Residual Receipts

By Lynn Zapp

HUD Headquarters required mandatory training of all field staff in December of 2008 as it relates to authorized uses of a project's residual receipts account. As there have been **no** changes to the policy or procedures that are laid out in HUD Handbook 4350.1, Chapter 25, this was considered a refresher course for all multifamily project managers.

Highlights of that training addressed the types of ownership entities that are required to maintain project residual receipts accounts. These are non-profit entities and limited dividend entities. The controlling documents that require a residual receipts accounts are the Regulatory Agreement (and Riders) and/or HAP Contracts.

The execution date of the original HAP contract is the date that will determine if Old Regulation or New Regulation

Section 8 requirements fit a specific project. Agreement to Enter into HAP executed before the following dates are Old Regulation and after these dates are New Regulation :

- New Construction – 11/5/79
- Substantial Rehab - 02/20/80

If your project falls under the Old Regulations, below are the allowable uses of your Residual Receipts Account:

- Reduce operating deficits;
- Make mortgage payments;
- Make repairs to the property not covered by Reserve for replacement account;
- Add additional amenities, such as air conditioning;
- Pay accrued, allowable distributions.

If your project falls under the New Regulations, the allowable uses of your Residual Receipts Account are:

- Reduce operating deficits;
- Make mortgage payments.

Note: From Handbook 4350.1 25-9 A – Using Residual Receipts funds is allowed in order to reduce operating deficits when legitimate "cash flow deficits exist." This means contrived shortfalls have to be treated as inappropriate. The evidence for a contrived situation could be where an owner/management agent took action that 1) was unnecessary (as in excess or unreasonable costs), or 2) accelerated the timing of expenses (e.g. paying for an entire year's service in advance when this did not provide an economic benefit to the project).

Contact Us!

Do you have an idea for a topic you'd like covered by the newsletter?
Do you have a successful property that you would like highlighted in the newsletter?
Please contact us at Kristin.Padavick@hud.gov with your suggestions.

DEVELOPMENT CORNER

By Chris Cook

The Ohio Multifamily Hub is on pace for another successful year in terms of production/development. As of March 31, 2009, the halfway point of HUD's fiscal year, initial endorsements (closings) for the entire state totaled 29 projects. These 29 projects consisted of 2,569 units, and a combined \$115,116,300 in insured mortgages and Capital Advances. This Hub activity contributed greatly to HUD's mission of increasing the availability of safe, decent and sanitary housing. The following information reflects the number of closed projects for each Section of the National Housing Act:

Section 221(d)(4) New Construction/Substantial Rehabilitation of Apartments: 2

Section 223(f) Refinance/Purchase of Apartments: 13

Section 232/223(f) Refinance/Purchase of Residential Health Care Facilities: 1

Section 223(a)(7) Streamline Refinance: 2

Section 223(a)(7) Streamline Refinance (with Office of Affordable Housing Preservation restructuring): 3

Section 241 Additions to Existing Facilities: 1

Section 202 Capital Advance: 3

Section 811 Capital Advance: 4

Property Spotlight: Cambridge Heights

By Chris Cook

In December 2008, The Columbus Hub, Lancaster Pollard, and Episcopal Retirement Homes successfully closed on a refinance transaction for Cambridge Heights, 65-unit project originally financed under the Section 202 Direct Loan program. The refinance of the project will enable the owners to complete a substantial rehabilitation of the entire building, thus preserving this essential affordable housing property. Cambridge Heights, located in Cambridge, Ohio, currently serves the

elderly population in that community, and has been doing so since constructed in 1981. The financing of the project involves not only a new HUD-insured loan, but also Low Income Housing Tax Credits (LIHTC) and secondary funds from the Ohio Housing Finance Agency (OHFA).

Through the refinance process, Cambridge Heights will convert from a direct loan to a HUD-insured facility. The 1.7 million renovation will make

significant improvements to the project, including replacement of the roof, reconfiguration of the common areas, expansion of the parking lot, and the replacement of all cabinets, countertops, fixtures and appliances in the residential units.

By partnering with its stakeholders, HUD will ensure the long-term viability of this asset. The lives of the residents and the financial position of HUD will both be enhanced.

Applewood Place II Grand Opening

By James Sanfilipo

Applewood Place II, a Section 202 Project Rental Assistance Contract (PRAC) project opened its doors on March 12th. The project will provide 50 one-bedroom units of affordable housing to the elderly. According to the U.S. Census Bureau, Mansfield has a higher percentage of elderly persons than the State of Ohio overall. Some of the many amenities that the project offers include a library, arts and crafts studio, com-

munity room and lounges. Affiliates of Lutheran Social Services of Central Ohio are the non-profit owner and management entities for Applewood Place II. Lutheran Social Services of Central Ohio offers a continuum of services to meet the needs of communities.

Right: Applewood Place II located at 1680 Executive Court in Mansfield, Ohio



HUD's Ohio World

Spotlight on HUD Staff

Two members of the Columbus Hub Funding staff performed disaster relief service at the Houston Field office during November and December. Lou Ann Bouchard and Jo Ann Drake spent 4 weeks each in Houston providing disaster relief services to victims of Hurricane Gustav.

New HUD Staff

Columbus HUB Office

Marianne Marinucci, Project Manager in Asset Management transferred from the Phoenix Arizona Office January 20, 2009

William Hughes was promoted to Director of Project Management effective February 15, 2009

Pamela Huson-Douglas was promoted to Senior Project Manager effective May 10, 2009

Theresa Lupo has rejoined the Columbus staff as a Supervisory Project Manager after working in the HUD Miami Program Center for several months. Theresa brings extensive supervisory and program experience that is sure to benefit the operations of the office. Theresa returned May 4, 2009.

Departed HUD Staff

Cleveland Program Center

John McNeela, Senior Project Manager, Asset Management retired effective January 3, 2009 with 36 years of Federal Service

Sylvester DiFiore, Project Manager in Asset Management retired effective January 3 with 30 years of Federal Service.

Gerald Creighton, Construction Analyst retired effective January 3, 2009 with over 20 years of Federal Service

Lakeetha Williams and Grennetta Taylor transferred to the Troubled Agency Recovery Center (TARC), Public Housing Division

Mary Schwegler, formerly Supervisory Project Manager in Asset Management has been reassigned to the Troubled Project Team as Senior Project Manager.

Columbus HUB Office

William Fairchild, Mortgage Credit Analyst retired effective January 2, 2009 with 42 years of Federal Service

David Bickham, Construction Analyst retired effective January 2, 2009 with 37 years of Federal Service

Recent Issuances

Mortgagee Letters

09-01 Annual Renewal of FHA Approval

09-06 Temporary Authority for Multifamily Hubs to Process Waiver Request to the Three-Year Rule for Section 223(f)

UPCOMING EVENTS

Neighborhood Networks Seminar June 24, 2009 9:30 am to 11:30 am at the Cleveland HUD Office located at 1350 Euclid Avenue in the Lower Level Auditorium. Refreshments will be provided. Special Guest Michelle Higgs, Neighborhood Networks Representative will be coming to the Cleveland Program Center. While here June 24th and 25th, she will be visiting properties with potential Neighborhood Network Centers providing them with her guidance and expertise. All interested property personnel are welcome to attend.

Quadel Consulting will be providing Assisted Housing Manager (AHM): Training and Certification in Cleveland, Ohio on September 22—24, 2009. Register today and get more information on the web at www.quadel.com.

