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| **Pre-Closing Conference Call Meeting Agenda**Section 232 |  | **U.S. Department of Housing and Urban Development**Office of Residential Care Facilities |

**Warning**: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

**Office of Residential Care Facilities (ORCF) Program Compliance**

*(Section 232 Program Handbook 4232.1 Section II, Chapter 9.2*

All Section 232 FHA-insured projects are governed by statutes, regulations and controlling documents. Borrowers and other program participants are obligated to comply with ORCF program obligations or be subject to program enforcement remedies. The assigned ORCF Account Executive (AE) must ensure all participants have been informed relative to their program obligations. Prior to the initial/final closing of a project, the AE will schedule a conference to review all pertinent matters regarding servicing of FHA-insured projects.

**Introduction:** The purpose of this meeting is to provide project participants with pertinent information about the Section 232 Program policies, procedures, and compliance requirements. Your AE will lead the discussion by reviewing each of the agenda items that follow. Please note that there are links provided for additional reference information and guidance (Ctrl + Click to follow the links that are highlighted in blue). Please use the gray shaded areas (e.g.,      ) to provide your response to requested information. Double click on a check box and then change the default value to mark selection (e.g., [x] ).

|  |  |
| --- | --- |
| **Property Name:** |         |
| **FHA Number:** |         |

|  |  |  |  |
| --- | --- | --- | --- |
| **AE’s Name:** |         | **Phone Number:** |       |
| **AE’s Email Address:** |         |  |  |

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| --- | --- |
| **Lender:** |       |
| **Owner’s Name:** |       |
| **Lessee/Operator’s Name:** |       |
| **Management Agent’s Name:** |       |
| **License Name and Held By:** |       |
| **Master Tenant Name:** |       |

Is this part of a portfolio? [ ]  Yes [ ]  No

 If yes, what is the name of the portfolio?

 Please list other projects in the portfolio
 <Type list here or include list as a separate attachmment>

Are the Owner, Lessee/Operator, and Management Agent related parties? [ ]  Yes [ ]  No

 If yes, please describe the relationship.

Is this facility: *(check all that apply)* [ ]  Assisted Living

 [ ]  Skilled Nursing

 [ ]  Memory Care

 [ ]  Board & Care

 [ ]  Other: *[describe here]*

How many other properties like this one do you own/lease/manage?

**Unit Breakdown:**

|  |  |  |
| --- | --- | --- |
| **Care Type** | **Units** | **Licensed Beds** |
| Assisted Living |       |       |
| Skilled Nursing |       |       |
| Board & Care |       |       |
| Memory Care |       |       |
| Independent |       |       |
|  **TOTAL** |  |  |

**Required Conference Call Meeting Participants:** Lender/Servicer, Owner and Owner’s accountant; Lessee/Operator and the Lessee/Operator’s accountant (if applicable); Management Agent (if applicable); and facility Administrator. **Please list meeting attendees where indicated at the end of this document.**

**Prior to the Call,** please complete and/or review the following:

1. **Lender:** The most important resource and contact is your Lender. The Lender is to receive all transactions/requests, review them, and then submit their recommendation to the HUD Account Executive for review and approval.
2. **Assigned Account Executive (AE):** The AE works in partnership with the Borrower, Lessee/Operator, Management Agent and Lender to ensure each FHA-insured 232 mortgage is financially and operationally strong; that each property provides a safe, quality place of residence; and that the loan remains viable for the term of the mortgage.
3. **Section 232 Handbook:** Please review the [Section 232 Handbook](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsgh/42321). The Project will be managed in accordance with the Section 232 HUD Handbook 4232.1, which is available at: [HUDCLIPS](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips). Additional information is also available at the [Section 232 Office of Residential Care Facilities Portal](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care). Section III Asset Management is the primary section of the Handbook for information on management of the project. However, the Handbook should be reviewed in its entirety for associated information.
4. **Firm Commitment Special Conditions**: Please review all Special Conditions that survive closing, such as risk management programs and special escrows and other items as applicable.
* **Risk Management Programs**:
	+ **Third-Party Risk Management program**
		- Operator must discuss **Third Party Risk Management Program** being implemented, including any changes being made to the recommendations.
		- Remind Lender to submit Action Plan in the Portal within 14 days of closing. Action Plan will remain in place and need periodic updates until risk has been eliminated.
		- Remind Operator they cannot cancel **Third-Party Risk Management** program without ORCF written approval, which will only be granted when they reach an overall 3-star CMS rating, have no abuse icons, and are not on any SFF-Candidate list. (*These conditions will be built into the Regulatory Agreement Addendum in the near future.)*
	+ **One-Time Risk Assessment**
		- Operator must discuss results of **One-Time Risk Assessment** and steps being taken to address risk
		- Remind Lender to submit Action Plan in the Portal within 14 days of closing. Action Plan will need periodic updates and will remain in place until risk is mitigated.
* **Escrow agreements**: Discuss withdrawal and release provisions for any escrow agreements.
1. **Internal risk management program**: The requirements for this internal risk management program are outlined in Paragraph 7 of the Operator Regulatory Agreement and are required for the life of the loan.
2. **Regulatory Agreement Review:** Review all Healthcare Regulatory Agreements (i.e., Borrower, Operator, and Master Tenant, as applicable). Draft copies of the Regulatory Agreements will be provided by the Lender for this review and discussion during the meeting. **Prior written approval from HUD is required to**:
3. Sell the property/change ownership
4. Change Operators and/or Operator lease terms
5. Change Management Agents
6. If a controlling participant is leaving the Borrower/Operator entity, the proposed change of participants must first be approved by HUD to ensure remaining participants have the sufficient expertise to own/operate the facility.
7. Convey, transfer, or encumber any portion of the mortgaged property
8. Put a lien on the property
9. Remodel, add to, subtract from, reconstruct, or demolish portions of the mortgaged property
10. Disturb the ground significantly (i.e., utilizing mechanical equipment to dig)
11. Modify bed authority (i.e., reduction, addition, or sale of beds/units)
12. Change the Approved Use – type of facility
13. Permits and Approval changes (i.e., convey, assign, encumber, transfer or alienate, or relinquish to any licensing or certification authority). Borrowers shall ensure that the project is always operated in accordance with the requirements of the Permits and Approvals.

Listed above are some, but not all the main issues encountered by the Lender and HUD. Please see Regulatory Agreement for additional requirements. ***Failure to comply with the Regulatory Agreement may result in a referral to HUD’s Departmental Enforcement Center (DEC) and civil money penalties (CMPs) may be imposed.***

1. **Accounting and Recordkeeping:** Books and records shall be kept in accordance with HUD’s requirements.
2. Accounting is on an accrual accounting basis. Although you are not required to utilize HUD’s chart of accounts exclusively for your recordkeeping, all accounting submissions to HUD must be prepared in accordance with the HUD chart of accounts (see [HUD Handbook 4232.1, Section III, Chapter 4. Financial Operations](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c4HSGH.pdf)). All cash receipts must be deposited in the name of the project in a bank whose deposits are federally insured.
3. Funds collected as security deposits must be kept from and apart from all other project funds in an interest-bearing account maintained in the name of the project. The interest should accrue to tenant unless otherwise specified by state law. The account must be 100% funded at all times.
4. For additional reference, please see the full [Industry User Guide for the Financial Assessment Subsystem - Multifamily Housing (FASSUB 7.4.0.0)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/fass/fassmf_guide)including Appendixes that have the full HUD Chart of Accounts Data Dictionary by Project Type; [HUD Handbook 4370.2 REV-1, Financial Operations and Accounting Procedure](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsgh/4370.2); and [Office of Inspector General (OIG) Handbook 2000.4, REV-2 Consolidated Audit Guide for Audits of HUD Programs](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/oigh/2000.4).
5. **Profit-Motivated Borrowers Financial Reporting Requirements:** For-profit Borrowers are required to submit their annual audited financial statements within 90 days of their fiscal year end into the Financial Assessment Subsystem (FASS). The first audit will cover the period from initial/final endorsement to 12/31 (FYE). Borrowers may select a FYE other the 12/31 in accordance with Internal Revenue Service (IRS) requirements; however, it must be consistent, and HUD must be advised in advance. If the initial/final endorsement date is within 120 days of FYE, a stub period deferral can be requested through REAC FASS.

The requirement for filing an audited financial statement is regulatory in nature and the Department does not waive the requirement. However, there are times when a project is newly mortgaged close to the end of a fiscal year. In these circumstances, the Borrower may request that the audit for the end of the initial mortgage year be approved as a “stub period” report to be folded into the next full fiscal year audit. Thus, the waiver request for submitting an audit would depend on the individual project's fiscal year end date. If the FASS date is within 120 days of the project's fiscal year end, this is considered a “stub period” and the owner may request that the Department consider a deferment of the audit for this time period. The following fiscal year's audit would be performed on both the following fiscal year and this additional “stub period.” The Borrower's Coordinator must submit this request on-line under the "*Select An Option Menu, Waiver*" in FASSUB on the REAC Secure Systems website.

Submission guidelines and guidance on stub period deferments can be found in the [Industry User Guide for the Financial Assessment Subsystem - Multifamily Housing (FASSUB 7.4.0.0)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/fass/fassmf_guide). Financial reporting requirements by entity type (i.e., profit motivated, non-profit, etc.) can be found in [HUD Handbook 4232.1, Section III, Asset Management Chapter 4. Financial Operations](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c4HSGH.pdf). For additional reference, see [Financial Assessment of Multifamily Housing (FASS-MF)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/prodmf).

1. **Non-Profit Borrowers Financial Reporting Requirements:** Non-profit Borrowers are required to submit an unaudited annual financial statement (owner certified) within 90 days of their fiscal year end into the Financial Assessment Subsystem (FASS) and an electronic annual audited financial statement is due to be filed in FASS no later than nine (9) months after the end of the fiscal year pursuant to OMB Circular A-133. However, they may choose to submit just annual audit within 90 days and thereby eliminate the extra step of having to file both an OC and A-133.
2. **Owner/Operator Financial Reporting Requirements:** *(Applicable to both Profit-Motivated and Non-Profit)*. Quarterly reports are required if the facility is **Owner operated**. Owner/Operators must submit their quarterly operator financial reports to the Lender that services the FHA-insured mortgage for the project for fiscal years commencing on or after December 2, 2014. These reports may be internally prepared and certified by an authorized representative or agent of the Operator, and while you are not required to use HUD’s chart of accounts exclusively for your recordkeeping, all accounting submissions to HUD must be prepared in accordance with the HUD chart of accounts ([HUD Handbook 4370.2 REV-1,Chapter 4 Financial Operations and Accounting Procedure](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsgh/4370.2)).

Quarterly reports are due to the Lender no later than 60 days after the period covered except for the FYE, which is due no later than 90 days after the end of the fiscal year. For example, the quarter ending 3/31 is due no later than 5/31, and the FYE 12/31 is due no later than 3/31. **Failure to submit financials timely may result in enforcement action.**



1. **Lessee/Operator Financial Reporting Requirements:** Lessee/Operators must submit quarterly reports in accordance with the Regulatory Agreement. These reports may be internally prepared, and certified by an authorized representative or agent of the Operator, and while you are not required to use HUD’s chart of accounts exclusively for your recordkeeping, all accounting submissions to HUD must be prepared in accordance with the HUD chart of accounts ([HUD Handbook 4370.2 REV-1, Chapter 4 Financial Operations and Accounting Procedure](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsgh/4370.2)).

Quarterly reports are due to the Lender no later than 60 days after the period covered except for the FYE, which is due no later than 90 days after the end of the fiscal year. For example, the quarter ending 3/31 is due no later than 5/31, and the FYE 12/31 is due no later than 3/31. See grid listed under #10.
2. **Master Tenant Financial Reporting Requirements:** Master Tenant must submit quarterly reports on a year-to-date basis (or more frequently if specified by HUD) as described in [HUD Handbook 4232.1, Section III, Asset Management Chapter 4. Financial Operations](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c4HSGH.pdf) (4.2 Financial Submission Requirements, Paragraph F). These reports may be internally prepared and certified by an authorized representative or agent of Master Tenant, and while you are not required to use HUD’s chart of accounts exclusively for your recordkeeping, all accounting submissions to HUD must be prepared in accordance with the HUD chart of accounts ([HUD Handbook 4370.2 REV-1, Chapter 4 Financial Operations and Accounting Procedure](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/hsgh/4370.2)).

Quarterly reports are due no later than 60 days after the period covered except for the FYE, which is due no later than 90 days after the end of the fiscal year. For example, the quarter ending 3/31 is due no later than 5/31, and the FYE 12/31 is due no later than 3/31. *Submission location is TBD.*
3. **Midsize and Large Portfolio Financial and Operational Reporting Requirements:** The entity that was the subject of a corporate credit review is required to submit financial and operational information as described in [HUD Handbook 4232.1, Section III, Asset Management Chapter 4. Financial Operations](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c4HSGH.pdf) (4.2 Financial Submission Requirements, Paragraph F).

Quarterly reports are due no later than 60 days after the period covered except for the FYE, which is due no later than 90 days after the end of the fiscal year. For example, the quarter ending 3/31 is due no later than 5/31, and the FYE 12/31 is due no later than 3/31. Submission location is to be determined.

For publicly traded companies, the Lender and Account Executive must be provided Quarterly Earnings Reports (electronic copies preferred) and invited to participate in all calls regarding said reports.
4. **Surplus Cash Borrower/Distribution:** Surplus Cash may be distributed in accordance with your Regulatory Agreement. Although the most recent Regulatory Agreement may allow for more frequent distribution of surplus cash, there are some Regulatory Agreements that allow for quarterly or semi-annual distributions. Review your Regulatory Agreement for guidance.

To support surplus cash distributions to the Borrower and other authorized entities and/or individuals, the project must keep a copy of all Computation of Surplus Cash, Distributions and Residual Receipts [HUD-93486-ORCF](https://www.hud.gov/sites/dfiles/Housing/documents/93486N_orcf.docx), which is located in the Revised Section 232 [Revised Section 232 Healthcare Documents](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/docsbynumber). **These forms must match the information entered in the Electronic Audited Financial Statements submission in the FASS system 90 days after the end of the fiscal.** The midyear computation must be included in the annual audited financial statements and the FYE computation must be prepared by the auditor and included in the AFS. If surplus cash is distributed more frequently than semi-annually, the notes to the audited financial statements must provide sufficient information to verify that amounts distributed were allowed in accordance with the Regulatory Agreement and all HUD-93486-ORCF forms must be kept on file with the project.
5. **Insurance Requirements**: [HUD Handbook 4232.1 Section II - Production, Chapter 14](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s2c14HSGH.pdf) applies to loans with Firm Applications received after 11/1/2014. The lender is required to retain information of the insurance to confirm it meets HUD requirements. **Please note:** Insurance in place at the time of closing shall not be changed without HUD prior approval. Waivers will not be granted retroactively.
6. **Physical Inspections:** Physical inspections of the property are conducted by HUD’s Real Estate Assessment Center (REAC) based on the type of facility. Assisted Living, Intermediate Care, and Board and Care facilities are inspected by HUD or contract inspectors and scheduled based on past physical inspection scores. For Skilled Nursing facilities, ORCF relies on the State Health Surveys. However, ORCF can request an inspection of a nursing home if the State Health Survey or some other indicator reveals physical issues that need further review by HUD. For current policy and updates, see the following: [Real Estate Assessment Center](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/online) and [Physical Inspection](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/prodpass). *Please note that the Physical Inspection scoring results will determine the* ***future frequency*** *of subsequent inspections.*
* If any Life Threating and Safety (LT&S) AKA Exigent Health and Safety (EH&S) deficiencies are identified during the physical inspection, your inspector will give you a list of the health and safety deficiencies. If you do not receive this list from the inspector, contact your Account Executive to obtain the Health and Safety report, which is released after the inspection. **The Borrower/Operator is responsible for mitigating all identified LT&S/ EH&S and Severe deficiencies within 24 hours**. Another 48 hours is given to provide evidence of correction to HUD via the NSPIRE system. The Borrower/Operator must complete the Certification of Exigent Health and Safety Issues – HUD-93332-ORCF. This form must be uploaded into NSPIRE, along with the documentation evidencing mitigation as required by 24 CFR 5.711(c).
* The NSPIRE inspection report will be available in NSPIRE approximately 15 days after the inspection. ORCF property owners and agents can access the NSPIRE system and view your inspection reports here: <https://hud.my.site.com/NSPIRE/s>. If you are still having issues logging in or experiencing technical issues with the NSPIRE system, please contact REAC’s Technical Assistance Center by email at reactac@hud.gov or by phone at 1-888-245-4860, Monday through Friday, 7am to 8pm EST.
* For projects that receive a below-60 REAC score, a Notice of Violation will be issued. The NOV will require that the entire facility be inspected by the Borrower within 60 days.  In addition to those deficiencies identified in the NSPIRE inspection report, the Borrower’s facility inspection must also document the repair of any other items identified that are deficient at the facility.  Upon completion of all repairs (both those identified in the NSPIRE inspection report and those identified by the Borrower). The NSPIRE POC, must certify and upload HUD form  [HUD-93333-ORCF Certification of Physical Condition Compliance](https://www.hud.gov/sites/dfiles/Housing/documents/93333N_orcf.docx) into NSPIRE.
1. **Project Capital Needs Assessment (PCNA):** The Regulatory Agreement requires a new PCNA be completed at least every ten years.  This may be expensed from the Reserve for Replacement account.
2. **Reserve for Replacement Account (R4R):** Please send requests for funds to your Lender. Contact your Lender for submission requirements. For authorized uses, reference [HUD Handbook 4232.1, Section III – Asset Management, Chapter 3, Section 3.2](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c3HSGH.pdf). Requests for the R4R must be submitted to the Lender who then submits the request directly to ORCF for processing. In general, invoices should not be more than 365 days old. Additionally, ORCF recommends a $1000/unit minimum balance be maintained for the life of the loan.

The [HUD-9250-ORCF](https://www.hud.gov/sites/dfiles/Housing/documents/9250N_orcf.docx) Funds Authorization can be found on the Loan Servicing web page at the following link: [Loan Servicing - Reserve for Replacement Documents](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/loan_servicing/R4R).

***Please note:*** *232 New Construction/Substantial Rehab and 241a loans, or other loans serviced by the New Unit Lease Up (NULU) team* ***are not eligible*** *for auto approval processing in the 232 Portal. It is imperative that Lenders review the R4R submission form and properly answer the question regarding NULU status to avoid auto approval.*

***Please note:*** *Properties with Green MIP Regulatory Agreements must confirm each R4R submission complies with the Regulatory Agreement and Program Obligations.*

1. **Non-Critical Repair Escrows:** Requests for withdrawals from or release of escrow funds are to be submitted to the Lender. The Lender submits the request to the ORCF. **Non-critical repairs are to be completed within one (1) year of final endorsement.** Extensions may be granted for extenuating circumstances and require prior HUD approval; contact your Lender. For additional reference, please see [HUD Handbook 4232.1, Section III Asset Management Chapter 3, Section 3.2.4](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c3HSGH.pdf), Non-Critical Repair Account. A partial list of items to include with request submissions follows:
* Copy of Exhibit C from Firm Commitment that details non-critical repairs
* Copy of Repair Escrow from Firm Commitment (specifics needed here)
* Owner’s Certification – Completion of Non-Critical Repairs and Protocol
* [HUD 92464-ORCF Request for Approval of Advance Escrow Funds](https://www.hud.gov/sites/dfiles/Housing/documents/92464N_orcf.docx) located at [Loan Servicing - Non-Critical Repair Documents](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/loan_servicing/NCR)
1. **Special Circumstances Requiring the Notification of the Servicer and/or AE:**  There are special circumstances that require a Borrower and/or Operator to notify the Servicer and the AE concurrently or to notify only the Servicer (who in turn would elevate the matter to the AE as appropriate) of a project’s risk, an action or improvement plan, or of progress on previously reported situations. An example of notification would be Operator financial performance falling below 1.00 DSCR on a T-12. This would require the submission of an Action Plan with periodic updates.

Other special circumstances include:

* Failure to make lease payment
* Default of Master Lease
* Special Focus Facilities
* Problematic surveys or actions threatening licensure (i.e., threats to Permits and Approvals, civil money penalties, or any governmental investigation or inquiry involving fraud)
* Legal judgments
* Annual verification of Professional Liability Insurance reveals inadequate coverage
* Annual verification of Fidelity Bond Coverage reveals inadequate coverage
* Notification of termination of insurance
* Threat to Abandon Project
* REAC Inspection score below 30 or a second score below 60
* Add or amend Accounts Receivable (AR)Loan
* Unauthorized Distributions
* Bankruptcy petition
* Delinquent mortgage payments

For additional guidance, please refer to [HUD Handbook 4232.1, Section III Asset Management Chapter 3, Section 3.10](http://portal.hud.gov/hudportal/documents/huddoc?id=42321s3c3HSGH.pdf). The required forms to be used to report special circumstances can be found on the Loan Servicing web page, but also here: [Operator's and/or Borrower’s Notification to HUD of Threats to Permits and Approvals](https://www.hud.gov/sites/dfiles/Housing/documents/93335N_orcf.docx) and [Servicer's Notification to HUD of Risks to Project and Action Plan for Remedy](https://www.hud.gov/sites/dfiles/Housing/documents/93334N_orcf.docx).

1. **Email Blasts and Other Online Resources:** Sign up to receive the [Email Blasts](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/mail_blast_index). This email list is used to distribute announcements and information from the Office of Residential Care Facilities on the Section 232 Program.
2. **Business Partner Registration System (BPRS):** During the financing application and underwriting process, participants have the option of registering participants electronically. HUD prefers the electronic process as it allows the participant to maintain and update participant information. It also is required for entrance into Secure Systems to access to the Financial Assessment Subsystem (FASS) and the Physical Assessment Subsystem (PASS). If this was not done during the underwriting process, all the entities (Borrower, Lessee/Operator, Management Agent, and their principals) need to register in the Business Partner System and Request a Coordinator or User ID and Password from Secure Systems. **Registering as a business partner and applying for a coordinator ID and Password is a four-step process that is required to be done in this specific sequence:**
3. Business partners (i.e., entities or individuals) need to register in the Business Partner Registration System (BPRS). If the participant you are about to register has done business with HUD before, you do not need to complete this step and you can skip to paragraph C below. To see if the entity or person is already registered, go to [BPRS](https://hudapps2.hud.gov/apps/part_reg/apps040.cfm) and enter the entity’s Tax ID Number (TIN) or Social Security Number (SSN). The system will indicate the entity or person is already registered.
4. After registration, **wait at least 24 hours** for the registration to take effect. If the registrant is not in system after 24 hours, contact the Multifamily End User Help Desk at 1-800-767-7588 or by email (preferred) at Apps-F24p@hud.gov. You may also contact the Real Estate Assessment Center (REAC) Technical Support at REAC\_TAC@hud.gov or call 1-888-245-4860 to verify whether you have been given access to Secure Systems.
5. **TIME SENSITIVE**: Apply as a Coordinator or User in Secure Systems on the [Secure Systems Registration Page](https://hudapps.hud.gov/public/wass/public/participant/partreg_page.jsp). Check with your organization to determine if you already have a coordinator. If not and you are a Coordinator, you can change all information except the Tax Identification Number (TIN), Legal Structure, and Ownership Type by accessing *Edit Participant Detail* from the *Participant Processing* drop down menu on Active Partners Performance System (APPS) home page.
6. After the business partner registration has been completed, the Coordinator or user must go back to the [Secure Systems Registration Page](https://hudapps.hud.gov/public/wass/public/participant/partreg_page.jsp) to choose a password and enter it in Secure Systems. Once this is complete, the Coordinator should continue creating all the entities and its principal individuals. See the [APPS Industry User Guide](http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/apps/appsindustryug) (Chapters 1- 4). If you make errors, the system does allow you to modify entries in Chapter 4. Once complete, the APPS coordinator must certify all the participants (entities and individuals), print and sign the Signature page, then send it to your assigned Account Executive (see Chapter 7 of the guide).
7. The registrant is responsible for keeping their contact information up to date throughout the life of the loan. If this is not done and the information is not kept up to date, the project will not receive important, automated communication from our systems and HUD staff.

Additional guidance for the registration process above is available at [Active Partners Performance System (APPS)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/apps/appsmfhm). The Secure Systems Documents, APPS Industry User Guide, APPS Quick Tips, and APPS Glossary of Terms are also available on this page. Additionally, there is an [APPS Tutorial](http://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/mfh/apps/appsmfhm/industrytutor) that will help business partners to learn the registration process.

**Website Addresses:**

[Office of Residential Care Facilities](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care) for ORCF Asset Management Guidance, Information, and documents.

[Loan Servicing Guidance Home](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/loan_servicing) Page for Asset Management Guidance and Information

[HUD Handbooks, Forms and Publications](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/handbks_forms) and [HUD's Client Information Policy Systems (HUDCLIPS)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/)

Whenever you select an item (Handbook, Notice, etc.) you will be selecting the “Housing” area to navigate to the correct area.

[Revised Section 232 Healthcare Documents](http://portal.hud.gov/hudportal/HUD?src=/federal_housing_administration/healthcare_facilities/residential_care/docsbynumber)

[Real Estate Assessment Center (REAC)](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac). Note: Once you access this link, please be sure to access REAC’s information by placing your cursor over Real Estate Assessment Center Access Ribbon as indicated in the screen shot below. It displays all the REAC links including Technical Support. REAC Help Desk (FASS & PASS): 888-245-4860 or by email (preferred so you have a record) at REAC\_TAC@hud.gov.

**REQUIRED: Please list all meeting attendees.**

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