

1	<p>TRACS/HUD Industry Meeting TRACS Working Group 04/12/2023</p> <p>▾</p> <p>TRACS Release 203A System Requirements Session Including HOTMA Impact Discussion</p>	
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2	<p>▸ Agenda</p> <ul style="list-style-type: none">▪ Panelists▪ Location of Requirement Documents▪ Status of HUD Forms Changes▪ Proposed Rollout Schedule▪ TRACS Sprint #3 & Clarifications▪ Other Changes▪ Questions	
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Panelists

- Lanier M. Hylton – HUD Multifamily Housing Programs
- Alisa Costello/Jerry Ledbetter – Pyramid
- Jed Graef - Housing and Development Software (HDS)
- Mary Ross – Ross Business Development (RBD)

Lanier M. Hylton

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Bi-weekly Meetings Next Three Meetings

- Wednesday, Apr 26, 2023, 1:00 PM – 3:00 PM EDT
- Wednesday, May 10, 2023, 1:00 PM - 3:00 PM EDT
- Wednesday, May 24, 2023, 1:00 PM - 3:00 PM EDT

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▸ Purpose of Meetings

- To communicate new and revised 203A requirements as quickly as possible.
- Address HOTMA Questions & OAMPO responses – to date.
- Discuss impact of responses.
- Not all changes are related to HOTMA.

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▸ Status of Forms Change

Lanette M. Hydon

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▸ 2502-0182

52670 Voucher et. al.

Special Claims Forms

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▸ 2502-0204

- 50059/50059A
- 27061 H Race & Ethnicity
- VAWA Forms
- 90100 Sample AR Notice
- 90101 Long Term Care
- 90102/90103 Verification of Disability 90105 Leases (Adding 811 PRA Lease)
- 90106 Unit Inspection

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▸ Location of Requirements Documents

New and revised documents will be included with each meeting.

All documents will be published on the TRACS Web Site as appropriate.

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▶

Proposed Rollout

Laurel M. Hydon

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▶ Handout

Detailed Rollout Provided

Laurel M. Hydon

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Specific Changes
Sprint 3

Laurent M. Hyland

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▸

SPRINT 3 Plan

There is a need for TRACS and CA software to move ahead even though we are still waiting on answers to various implementation questions

Lanier M. Hydon

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▸

SPRINT 3 Plan

We will assume that HOTMA applies to all subsidy types

In some other cases we will assume certain rules

In either case, code will be adjusted in a subsequent sprint if necessary

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▸

HOTMA

Responses from OAMPO

Lamar M. Hyton

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▸ Applicability of HOTMA

No more 221(d)(3)
BMIR contracts – all
have been converted.

No more 236
insured projects –
all have been
converted/completed.

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▸ Applicability of HOTMA

OGC will determine the impact of HOTMA on 236 noninsured projects with IRPs.

HUD thinks that these projects will follow the new regulations except for the asset limitation, which does not apply to 236 projects.

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▸ Related MAT Changes

As with Rent Supplement and RAP, TRACS and CA software will fatal a 2.0.3.A transmission that specifies BMIR as the subsidy type.

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▸ 202/8

202/8 follows all other Section 8 rules
(as before)
except the asset disqualifiers do not apply
(\$100000 and real property suitable for occupancy)

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▸ Income Code Change

From – MT – Means Tested

To – SH – Safe Harbor

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▸ HOH References

When referencing heads of household and spouse,
does this include HOH and co-HOH?

Yes

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▸ Fosters and the NCR

Fosters (children/adults/children of fosters)
are not subject to the Noncitizen Rule

The 203A Relationship Rules spreadsheet is being
updated

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▸ Asset Cap/Limit

Owner/agents will not be able to establish their own Asset Cap/Limit.

This number is adjusted each year for inflation.

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▸ Asset Cap/Limit

There is no provision to “grandfather in” existing residents with respect to the asset limitation in 24 CFR 5.618.

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▸ Assets Disposed

An asset disposed of for less than FMV
would be counted toward
the \$100,000 asset limit
unless excluded
under another provision of regulation.

May have to wait on the HSG Notice.

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▸ Asset Record Changes

Asset Record when Asset
is Real Property That is a Disqualifier
and both the Asset Cash Value and Income are \$0
Should still be listed on 50059

Will allow for \$0 cash value asset and actual
income of \$0 to be listed on the record.

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▶ **Medical/Disability Assistance Expense Percentage**

Phase-in Hardship Exemption is Automatic

5% 2024
7.5% in 2025
10% 2026

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▶ **HUD's Response**

Medical or Disability Expense	<p>Question: For existing residents receiving Medical Expense Deduction or the Disability Expense Deduction as of 1/1/2024, does the percentage change with the next recertification (AR or IR effective 1/1/2024 or later) or only with the next AR effective 1/1/2024 or later?</p> <p>OAMPO: The automatic phase-in will occur at the family's next IR or AR after 1/1/2024, whichever is sooner.</p>	<p>Proposed Response: The change will be effective with the next full certification effective 1/1/2024 or later. This includes an AR, IR, MI (for a resident moving from one MFH program to another) or IC.</p>
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▸ Medical/Disability Assistance Expense Percentage

Phase-in Hardship Exemption Starts at 5% with
the first IR or AR effective 1/1/2024 or later.

The % increases to 7.5% on the first IR or AR
effective 1/1/2025 or later.

The % increases to 10% on the first IR or AR
effective 1/1/2026 or later

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▸ Other Changes Sprint 3 Changes

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TRACS Reference Table Sprint Assumptions

Parameter Name	Use for: ? = 236 Unknown	Current Value	1/1/2024 Value	1/1/2025 Value
Passbook Rate	All Subsidies	.06% (0.0006)		
Dependent Deduction (also used for Adoption Assistance Income cap and Earned Income cap for an Other Adult Full-Time Student)	All Subsidies?	\$480	\$480	
Elderly Deduction	All Subsidies?	\$400	\$525	
Imputed Asset Threshold	All Subsidies?	\$5,000	\$50,000	
Asset Cap (S8 only) (+ Real Property Rule)	S8 only	NA	\$100,000	
% of Annual Income value	All Subsidies?	3%	10%	
% of Income Hardship value	All Subsidies? + Rule	NA	5%	5%
% of Income Phase-in value	All Subsidies? + Rule	NA	5%	7.5%
De minimis error (adjusted income)	All Subsidies?	NA	\$30	
Minimum Rent	S8, 202/8, (SPRAC?)	\$25	\$25	

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▸ % of Income Hardship Value Rule

Is the Hardship exemption applicable to new MI's or IC's effective on or after 1/1/2024

in addition to those already in residence.

Assume Yes.

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▸ % of Income Phase-in Value Rule

Assume this exemption applies to Families in residence as of 12/31/2023 who are receiving either a disability or medical deduction AND who are still in residence as of 1/1/2024.

Still waiting on other qualification answers.

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▸ Implementation

- Subject to the caveats, all code that must use the new Reference Table values can be updated
 - Deduction Calculations
 - Imputed Asset Threshold
 - Asset Cap (and Real Property Rule) for S8
 - De minimis Error Amount (CAs and TRACS)
 - Minimum Rent

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▸ Child Care Deduction

Normal calculations apply except for the case where a family member has been granted a Child Care Hardship Exemption.

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▸ Child Care Hardship Exemption

- To avoid a major change in site software the following steps will apply:
 - Move the member's childcare to work expenses that no longer enable work to look for work/go to school
 - Delete any income previously enabled by childcare that no longer is enabled
 - Change the member's Able to Work Care Code from C to E (HOTMA Child Care Exemption)

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▸ Disability and Medical Deductions

- Three % multipliers may apply:
 1. % of Annual Income Value = 10%
 2. % of Income Hardship Value = 5%
 3. % of Income Phase-in Value = 5% and 7.5%

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▸ Disability and Medical Deductions

- If neither the Phase-in nor Hardship exemptions apply, the % of Annual Income Value in effect on the certification effective date is used in the 2.0.3.A calculations:
 - 3% for certs effective before 1/1/2024
 - 10% for certs effective on and after 1/1/2024

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▸ Disability Assistance and Medical Deductions

- If the Hardship exemption applies, the % of Income Hardship Value in effect on the certification effective date is used in the calculations.
 - 5% for any 2.0.3.A certification effective 1/1/2024 or later.
 - NA for earlier certifications

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▸ Disability and Medical Deductions

- If the Phase in exemption applies, the % of Income Phase-in Value in effect on the certification effective date is used in the 2.0.3.A calculations.
 - 5% for any IR or AR effective in 2024
 - 7.5% for any IR or AR effective in 2025
 - 10% for any IR or AR effective in 2026 (Phase-in is over)
 - NA for earlier certifications.

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▸ Dependent & Elderly Deductions

Note: The Dependent Deduction Amount is also used for Adoption Assistance Income cap and Earned Income cap for an Other Adult Full-Time Student.

Use the values in the reference table in effect on the 2.0.3.A certification effective date

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▸ Imputed Asset Threshold

When applying the imputed asset threshold, use the value in the reference table in effect on the 2.0.3.A certification effective date.

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▸ Imputed Asset Threshold

- If the Cash Value of the assets is greater than the threshold amount, apply the imputed income calculation rule in effect on the cert effective date.
 - Use the 202D model for certifications effective before 1/1/2024
 - Use the 203A model for certifications effective 1/1/2024 or later

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▸ Asset Cap & Real Property Rule

Section 8 Only (not 202/8 or 202 SPRAC)

Applies only to 2.0.3.A certifications effective
1/1/2024 or later

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▸ Asset Cap & Real Property Rule

If the Total Cash Value of Assets exceeds the cap, the Enforce Asset Cap field must be filled with either a Y(es) or N(o)

If any asset has the Is Real Property flag set to Y(es) then the Enforce Real Property Rule must be filled with either a Y(es) or N(o)

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▸ De minimis Errors (CAs and TRACS)

Still working on this.

Looking for industry comments.

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▸ De minimis Errors (CAs and TRACS)

- Errors are applicable to 2.0.3.A certs.
- However, rule appears to apply to all certs under review starting 1/1/2024.
- HOTMA defines a de minimis error as an error in the calculation of Adjusted Income that does not exceed \$30 per month (\$360 per year).
- An owner/agent may not be cited for a de minimis error on an MOR.

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▸ De minimis Errors (CAs and TRACS)

- Two new errors have been added for de minimis errors related to Adjusted Income
 1. DMEU = Undercharged de minimis error
 2. DMEO = Overcharged de minimis error
- If the family has been overcharged, the O/A must fix the problem.

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▸ De minimis Errors (CAs and TRACS)

Note that a de minimis error related to Adjusted Income can cause TTP, TR, and AP to be off by a maximum of \$9

TRACS team is considering additional de minimis errors for these calculations.

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▸ Minimum Rent (TTP)

- Section 8, 202/8, SPRAC??
- Apply the calculation rule as currently defined for Section 8.
- If there is a Minimum Rent Hardship Exemption Code, allow the TTP to fall below the Minimum Rent amount in effect for the certification date (currently \$25).

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▸ Unit Group Number

- Add a Unit Group Number field to the following 2.0.3.A records:
 - MAT10 field 108
 - MAT15 field 32
 - MAT40 field 20
 - MAT65 field 20
 - MAT70 field 32

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▸ Unit Group Number Description

Fill only if the unit is a group home residential space. Fill with the Group number of the physical unit of which the residential space is a part. In Group Homes, individual bedrooms within a physical unit are rented independently as units (residential spaces) in their own right.

When this is the case, each bedroom is given a TRACS Unit Number. To help understand the relationship between these Unit Numbers and the physical unit, each physical unit must be assigned an ID (Unit Group Number) that is unique within the property.

This allows a reviewer to understand the relation between the unit number assigned to a household/certification and the physical units.

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▸ TENHR and VCHHR Changes

- Release/Version and CA Software Release/Version fields
- Description modified:
 - Enter the date on which the current version of the software was created if no Release or Version identification exists.
- Blanks, NA or N/A will cause an error

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▸ TENHR and VCHHR Changes

Owner TIN field
must be filled
for all subsidy types

If Parent Company TIN
is filled
it may not have
the same TIN
as the Owner TIN.

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▸ TENHR and VCHHR Changes

- UElS
 - Awardee UEI must be filled for all subsidy types
 - Immediate Parent UEI must be filled if there is an immediate parent
 - If there are higher order parents, pick the highest one and fill either the Domestic Parent UEI or Global Parent UEI depending on whether the company is US-based or Foreign-based

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▸ TENHR and VCHHR Changes

- UElS
 - All UEIs filled must be different
 - If either a Parent TIN or an Immediate Parent UEI is filled, then both must be filled

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▸ TENHR and VCHHR Changes

Subsidy Type value modification
5 = BMIR (Not Active)

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▸ MAT10 Basic Record Changes

- Change field 17 to filler
- Modify Field 25 from filler to Previous Subsidy
 - Needed to accommodate the new 2-character subsidy types

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▸ MAT10 Basic Record Changes

For 2.0.3.A certs effective 1/1/2024 or later

- **Field 26 Number of Family Members**
 - Modify the calculation to exclude Fosters in addition to Live-Ins, and None's
- **Field 27 Number of Non-Family Members**
 - Modify the calculation to include Fosters

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▸ MAT10 Basic Record Changes

- **Field 62 Worksheet Code**
 - Fill with E for all subsidy types
- **Field 68 Change the field name to Section 236 Basic Rent from Section 236 Basic/BMIR rent**

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▸ MAT10 Basic Record Changes

- Fields 96-98 Mobility, Hearing, and Visual Disability
 - Fill based on the new 203A definition of family (Field 26) that excludes fosters for certs effective 1/1/2024 or later
 - Fill based on the old definition for earlier certs

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▸ MAT10 Basic Record Changes

Field 99 Extenuating Circumstances Code

- Remove #3 Late annual (re)certification due to owner/agent delay for 203A certs

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▸ MAT10 Family Record Changes

- Able to Work Care Code may not be filled for F, L, or N for 203A certs effective 1/1/2024 or later.
- It may be filled for F for 203A certs effective before 1/1/2024

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▸ MAT10 Family Record Changes

Student Status may not be filled for F, L, or N for 203A certs effective 1/1/2024 or later.

It may be filled for Fosters for 203A certs effective before 1/1/2024

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▸ MAT10 Income Record Changes

Change the MT income code
to SH = Safe Harbor Income Source

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▸ MAT 65 Record Changes

Add an OA =
Delayed AR suspension code and description

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Voucher Changes

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▸ MAT30 Miscellaneous Accounting Request

UUTL is no longer a valid code in 203A

Verify that RADN, RADZ, RADR, RDRV, and RPMT codes were already added.

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▸ Challenge

2024 Certifications created using version 2.0.2.D and corrected using version 2.0.3.A when there is a rent increase.

Need to offset during the 30-Day Rent Increase Notice Period.

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▸ MAT30 Miscellaneous Accounting Request HOTM

- Add HOTM = Reversal of HOTMA Assistance Payment Adjustment
 - Auto-generated by OA software
- Add instructions to the Comment field for HOTM: For a HOTM transaction, enter the certification effective date here in MM/DD/YYYY format.
- Applicable for 2.0.3.A vouchers only and for a limited time period

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▸ MAT30 Repayments and Escrows

- The earlier version of 203A implemented a major rewrite of the record.
- Check that all fields have been implemented.
- 203A Repayment Agreement baseline for all active agreements required on 203A implementation

Note: Ending Agreement amounts may never be negative (field definition = M^*)

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▸ MAT30 Repayments and Escrows

- Transaction Type C = Cancellation of FSS Escrow
- Status of TE = Termination of Escrow

Definition change
Funds remain with the owner

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▸ MAT30 Repayments and Escrows

- New Status code of TR = Transfer (Repayment)
- Applies to Owner Repayment Agreements Only.
- Use when the Owner Agreement has been transferred to the LOCCS financial system.
- The outstanding balance of the agreement is reduced to 0 with this transaction.

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▸ Owner Repayment & Voucher

Still waiting for guidance from HUD.

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▸ Handout

203A Relationship Rules



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▸ Handout

203A Table by Contract Type



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▾
Changes Not Related to HOTMA

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▾
Handout
LATE AR



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▸ The Challenge

Some Site Software
is allowing OAs to Bill for Subsidy
Beyond the 15th Month
Even if no AR has been completed.

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▸
New Suspension Code TM/OA
Late AR – Owner/agent Action

Removal of Extenuating Circumstance
Code

3 = Late annual (re)certification due to
owner/agent delay

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▸ Other Extenuating Circumstance Codes Still Valid

- OAs may bill for Late ARs for other reasons just not that one.
- For example,
 - Late AR because of the need for a Reasonable Accommodation or
 - Late AR because of 3rd party action.

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▸ Late AR Query

The Late AR Query allows OAs, CAs and HUD to see late ARs when a resident has been terminated.

The report shows the reason why.

The Late AR Query does need work since it will still show residents who are 800 days late which is an issue.

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▸ Help Desk Staff

Helps the Help Desk staff understand when there should be an IC (any other termination) and when the OA should submit an AR instead of an IC.

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▸ PRAC – No CA

This also means that PRAC contracts will be held accountable if the ARs are not completed in a timely manner.

Since there is no CA for PRAC and since PRAC MORs have increased significantly, this may solve a lot of problems.

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▸ The Resident Ledger

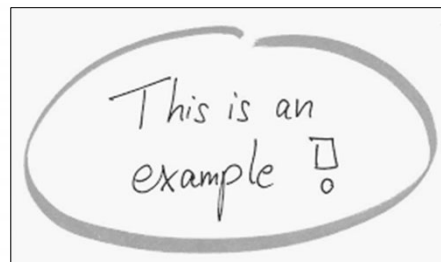
Site software should be programmed to take into consideration special rules, in regards to the tenant ledger, when a resident is Suspended using the TM/OA combination.

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Example



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- Allison lives in Columbus Gardens, a Section 8 Senior Community
- The Contract Rent for Allison's unit is \$750.
- There is no Utility Allowance.
- Allison's AR is effective on 5/1 each year.
- On 5/1/2024, Allison's AR reflects TTP = \$494. (AP = 256).
- On 1/1/2025, a GR is applied raising Contract Rent to \$775.
- Allison's TTP remains the same (\$494) but AP increases to \$281.

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- In 2025, Crystal Ball, the certification specialist, fails to start the AR process.
- There is no 120 Day Reminder Notice.
- There is no 90 Day Reminder Notice.
- There is no 60 Day Reminder Notice.
- On 4/5/2025, Crystal creates the 5/2025 voucher and includes an AP request for \$281 for Allison.
- On 5/5/2025, Crystal creates the 6/2025 voucher and includes an AP request for \$281 for Allison.
- On 6/5/2025, Crystal creates the 7/2025 voucher and includes an AP request for \$281 for Allison.
- On 7/5/2025, Crystal creates the 8/2025 voucher; this voucher is not supposed to include an AP request for Allison but it does.

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▸ Note

Site software must not allow an Assistance Payment request in month 16 if there is no AR and no TM.

If the site software allows a request in the 16th month, the voucher will be rejected.

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▸ Continuing Example

The CA rejects the voucher.

Note: TRACS will issue a FATAL error as well if there is no CA. (new)

TBD – will O/A voucher record need to include next AR date MAT fields?

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Continuing Example

Crystal may either, submit a completed AR effective 5/1/2025 or submit a Suspension TM/OA effective 4/30/2025. Owner/agents may not create a Miscellaneous Accounting Request to reverse the AP request.

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Continuing Example

- On 7/9/2025, Crystal creates and finalizes the Suspension TM/OA effective 4/30/2025.
- On 7/10/2025, Crystal creates and submits a corrected voucher that includes the TM/OA Suspension.
- The voucher adjustment page includes reversal of the \$281 AP request for 5/25, 6/25 and 7/25 and the net adjustment is -\$843.
- There is no AP request for Allison on the corrected 8/2025 voucher. The unit is shown as Market, Market.

Lanier M. Hyllon

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▸ Note: Resident Billing after the TM/OA

Site software should be designed to manage the resident's ledger in these cases.

- *For May, June, and July, Allison's Tenant Rent continues to be \$494.*
- *The owner/agent may not charge the resident more as the responsibility for the AR delay is not the resident's.*

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▸ Notes

- *Note: If the resident should be Terminated for cause (e.g. failing to report for AR, or failing to provide required signatures) then the TM/OA is not used. A Termination using the appropriate code is used. Any Termination transaction must be effective before the AR Due Date.*
- *Note: If the resident moved out before the AR Due Date, then the OA sends a MO transaction. The MO effective date must be before the AR Due Date. If the owner/agent did not complete the AR because the resident provided notice to move, and if the resident did not move out before the AR Due Date, the owner/agent must submit a TM effective the day before the AR Due Date. The owner/agent is not entitled to subsidy on or after the AR Due Date when no new AR is created/completed.*

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Continuing Example

- Crystal completes the 5/2025 AR on 7/12/2025.
- Allison's new TTP is \$551 and the AP = \$224.
- Allison signs the certification on 7/13/2025 and at the same time Crystal provides a 30 Day Notice of Rent Increase.
- The rent increase will take effect on 9/1/2025 even though the AR is effective 5/1/2025.
- On 8/5/2025, Crystal creates the 9/2025 Voucher.
- The Assistance Payment for Allison is \$224.
- The Adjustment Page shows an addition of \$224 for 5/2025, 6/2025, 7/2025 and 8/2025 for a total of \$896.

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► Note: Resident Billing After the AR

Site software should be designed to manage the resident's ledger in these cases.

- *In May, June, July and August, Allison's Tenant Rent is \$494 even though the new TTP on the AR effective 5/1/2025 is \$551 and the new AP is \$224.*
- *This is because Allison did not receive a 30-Day Notice of Rent Increase until 7/13/2025.*
- *The result is that the total collected by the owner/agent is \$718 for each of these months.*
- *Contract Rent is \$775 leaving an unpaid balance of \$57 per month for 4 months.*
- *An owner/agent may not charge the difference (retroactively) when the AR is late due to owner/agent action.*

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▸ Proposed MAT Guide
Reorganization

Lauren M. Hyman

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▸ We Have a Question

Appendix L (in the earlier 2.0.3.A draft) is
the Industry Specification...

Leave it as an appendix or publish it as a
standalone document as has been done in the
past?

Lamer M. Hydon

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Chapter 1 Introduction	Chapter 1 Introduction
Chapter 2 Understanding the MAT	Chapter 2 Understanding the MAT
Chapter 3 TRACS User Certification (removed)	Chapter 3 TRACS Operating Tips
Chapter 4 TRACS Operating Tips	Chapter 4 PBRA RAD
Chapter 5 Tenant System Record Formats and Definitions	Chapter 5 Required HUD-50059, HUD- 50059-A and Subsidy Reporting
Chapter 6 Voucher Payment System Record Formats and Definitions	Chapter 6 Tenant System Record Formats and Definitions
Chapter 7 Required HUD-50059, HUD- 50059-A and Subsidy Reporting	Chapter 7 Voucher Payment System Record Formats and Definitions
Chapter 8 iSERS (Blank)	Chapter 8 iSERS
Chapter 9 – PBRA RAD	

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102	Appendix A Multifamily Housing Hub and Program Center Structure	Appendix A TRACS Message Formats
	Appendix B TRACS Message Formats	Moved to TRACS 2.0.3. Errors/Messages Guide
	Appendix C Tenant/Voucher Error Messages-Codes	Moved to TRACS 2.0.3. Errors/Messages Guide
	Appendix D Discrepancy Codes	Moved to TRACS 2.0.3. Errors/Messages Guide
	Appendix E Fatal Error Messages-Codes	Moved to TRACS 2.0.3. Errors/Messages Guide
	Appendix F Tenant Informational Messages	Moved to TRACS 2.0.3. Errors/Messages Guide
	Appendix G Voucher Status Acknowledgement Messages	Appendix B Calculation Guidance
	Appendix H Calculation Guidance	Appendix C MAT15 Address Record Specification
	Appendix I MAT15 Address Record Specification	Appendix D Baseline Requirements
	Appendix J Baseline Requirements	Appendix E Industry Specification
	Appendix K New Subsidy Types (in new Chapter 3)	Appendix F Industry Specification ???
	Appendix L Industry Specification	

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104	<p>▸ Action Items Identified in this Meeting</p>
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Larnter M. Hylton

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