

3	<p style="text-align: center;">▶ Panelists</p> <ul style="list-style-type: none">▪ 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)
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Lanier M. Hylton

4	<p style="text-align: center;">▶ Bi-weekly Meetings Next Three Meetings</p> <ul style="list-style-type: none">▪ Wednesday, May 24, 2023, 1:00 PM - 3:00 PM EDT▪ Wednesday, June 7, 2023, 1:00 PM – 3:00 PM EDT▪ Wednesday, June 21, 2023, 1:00 PM - 3:00 PM EDT
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TRACS Industry Working Group Sessions

5

▸ 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.

TRACS Industry Working Group Sessions

6

▸ Status of Forms Change

Lanette M. Hylen

7

▸ Forms


2502-0182	2502-0204

Lanier M. Hyllon

8

▸ Rollout Schedule

Updates to Rollout Schedule



Lanier M. Hyllon



10

▸ MAT Guide Chapter Drafts

Drafts

Chapters 1-7

TRACS 2.0.3.A

MAT Guide

Lanette M. Nylen

11

▸ MAT Guide Chapter Drafts

<p>Posting New Drafts</p> <p>With edits</p> <p>By Monday</p> <p>May 15, 2023</p>	<p>Next</p> <p>Comment Deadline</p> <p>May 22, 2023</p>
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12

▸ MAT Guide Chapter Drafts

There are rules.
Comments to
Lanier & Princess
If you feel it is appropriate,
copy Jed and Mary

Lanier M. Hyllon

13

▸ The Drafts

These are very raw drafts.

They still include notes and comments.

They still need formatting.

Lanier M. Hyllon

14

▸ Seeking Additional Comments

- The MAT Guide is not meant to be an occupancy guide.
- Consideration of edits should be related to TRACS or SW development.
- Questions re: content should be related to TRACS or SW development.
- Be specifically mindful of the word “must”.

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15

▸ HOTMA

MAT Guide editors cannot provide clarification regarding implementation of HOTMA.

Inquiries should be sent to MFH_HOTMA@hud.gov

Lamar M. Hyman



17

Comments or Talking Points to Date - 1

Chapter 4 PBRA RAD – Rent Phase-in 202D v 2.0.3.A

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U.S. Department of Housing and Urban Development



Tenant Rental Assistance Certification System

Monthly Activity
 Submission Instructions for Owners, Agents, State Housing Finance Agencies and PHAs
 November 2010 - Revised (TRACS Version 2.0.3.D)



TRACS Development Team
 U.S. Department of Housing and Urban Development
 401 South D. St. N
 Washington, DC 20510-0001 Fax 202-677-7168 +1-800-767-7688

18

Comments or Talking Points to Date - 2

Residents whose TTP Is Equal to or Exceeds GR (AP is zero or negative)

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U.S. Department of Housing and Urban Development









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19	<p>▶ Comments or Talking Points to Date - 3</p> <p>RAD for 811 PRAC</p>	 <p>U.S. Department of Housing and Urban Development</p> <hr/>  <p>Tenant Rental Assistance Certification System</p> <hr/> <p>Monthly Activity Submission Instructions for Owners, Agents, State Housing Finance Agencies and PHAs November 2010 - Revised (TRACS) Version 2.0.2.02</p> <hr/>  <p>Projects: TRACS Development Team U.S. Department of Housing and Urban Development 451 Seventh St., S.W. Washington, DC 20510-0001 Fax 202-671-7161 • 1-800-767-7688</p>
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20	<p>▶ Comments or Talking Points to Date - 4</p> <p>Net Cash Value of Assets Equal to or less than \$50000</p> <p>Streamlined Verification (Every Three Years)</p> <p>Tracked: O – Owner/agent Verified (Year 1) T – Tenant Self-certified Years 2 & 3)</p> <p>Not HOTMA – Rule Effective in 2018</p> <p>Must allow for OAs who have already implemented this change – (can start with T)</p>	 <p>U.S. Department of Housing and Urban Development</p> <hr/>  <p>Tenant Rental Assistance Certification System</p> <hr/> <p>Monthly Activity Submission Instructions for Owners, Agents, State Housing Finance Agencies and PHAs November 2010 - Revised (TRACS) Version 2.0.2.02</p> <hr/>  <p>Projects: TRACS Development Team U.S. Department of Housing and Urban Development 451 Seventh St., S.W. Washington, DC 20510-0001 Fax 202-671-7161 • 1-800-767-7688</p>
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21

▸ Comments or Talking Points to Date - 5

Recertification for Fixed Income Families (FAST Act)

- Review of **Income** Required Every Three Years
- AR still submitted each year.
- Not HOTMA – In effect since 2018






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22




▸ The FAST Act

- The FAST Act became effective in March 2018. Under the FAST Act, when at least 90% of a household's income is from a fixed source (e.g. Social Security, VA Disability, fixed pension) a review of income can be conducted once every three (3) years. A new certification must be submitted every year. Compliance with the FAST Act is not monitored by TRACS.
- For tracking purposes, a new field is being added to the MAT to identify fixed income households (MAT10, Section 2, field 20: Fixed Income Household).
- Fill the new field with "Y" if the household qualifies as a Fixed Income Family and leave blank if not. This field should not be filled for any certification effective prior to March 2018.

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23	<h2>► Comments or Talking Points to Date</h2> <h3>- 6</h3> <p>Rent Override Reason</p> <p>PO – For POA project where the Rent Calculation is not standard</p> <p>R1 - RAD Conversion IC – Component 1 PH to PBRA RAD Only</p> <p>R2 - RAD Rent Phase-in – Component 1 PH to PBRA RAD Only</p> <p>R3 - Component 1 PH to Right to Return IC (could be MI if the OA was advised to create a MO when the resident was relocated)</p> <p>OT – Other Reason Not Yet Defined by HUD.</p>	 <p>U.S. Department of Housing and Urban Development</p> <hr/>  <p>TRACS Rental Assistance Certification System</p> <hr/> <p>Monthly Activity Submission Instructions for Owners, Agents, State Housing Finance Agencies and PHAs November 2010 - Revised (TRACS) Version 2.0.2.0</p> <hr/>  <p>Projects TRACS Development Team U.S. Department of Housing and Urban Development 401 South D. St. Washington, DC 20510-0001 Fax 202-677-7161 • 1-800-767-7688</p>
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24	<h2>► Comments or Talking Points to Date</h2> <h3>- 7</h3> <p>Return of Errors</p> <p>SSN (ID) Must Only Display Last 4 Characters</p>	 <p>U.S. Department of Housing and Urban Development</p> <hr/>  <p>TRACS Rental Assistance Certification System</p> <hr/> <p>Monthly Activity Submission Instructions for Owners, Agents, State Housing Finance Agencies and PHAs November 2010 - Revised (TRACS) Version 2.0.2.0</p> <hr/>  <p>Projects TRACS Development Team U.S. Department of Housing and Urban Development 401 South D. St. Washington, DC 20510-0001 Fax 202-677-7161 • 1-800-767-7688</p>
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25

▸ Non-essential Personal Property

- Explanation of the Example of Income from Assets that we are including in the MAT Guide Chapter 5.



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26



27



Recap of 203A Changes

From the original Final Spec

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28

▸ Race and Ethnicity

- Added Ethnicity Sub-types
 - Puerto Rican
 - Cuban
 - Mexican, Mexican American, Chicano/a
 - Another Hispanic, Latino/a or Spanish origin

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29

▸ Race and Ethnicity

- Added Race Sub-types (Asian)
 - Asian India
 - Japanese
 - Chinese
 - Korean
 - Filipino
 - Vietnamese
 - Other Asian

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30

▸ Race and Ethnicity

- Added Race Sub-types (Native Hawaiian or Other Pacific Islander)
 - Native Hawaiian
 - Samoan
 - Guamanian, Chamorro
 - Other Pacific Islander

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31

▸ Previous Housing Code

Code 2=Without or Soon to Be Without Housing is a legacy code to be used only for MIs or corrections to MIs originally transmitted under TRACS Release 2.0.2.C or earlier Releases.

Code 2=Without or Soon to Be Without Housing is not to be used for any new MI effective on or after 10/1/2015. Any MI effective 10/1/2015 or later, that includes Code 2 in the Previous Housing Code field must be corrected to use a valid code (5 = *Lacking a Fixed Nighttime Residence* and 6 = *Fleeing/Attempting to Flee Violence*).

TRACS will issue a FATAL error if a Code 2 is submitted for any MI certification or corrected certification with an effective date on or after 10/1/2015. Site and CA software vendors are expected to enforce this rule.

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32

▸ Streamlining Rule as Related to Children Under the Age of 6 at MI/IC

- Housing Notice 2016-09 Streamlining Administrative Regulations for Multifamily Housing Programs
- 999-99-0000
- There are approximately 273 active households that have at least one family member with the "999990000" as the SSN.
- For 203A- Two Edits:
 1. TRACS will generate a fatal error if family ID code is 999990000
 2. TRACS will generate a fatal error if no SSN Exception for household member using 999999999.

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33

▸ SSNs for Fosters

- Printing/Displaying SSN and Date-of-Birth for Fosters on the 50059
- Starting with the implementation of TRACS 2.0.3.A, the SSN for a Foster Child/Foster Adult will NOT be printed on the 50059.
- Site and CA software MUST ensure that the ID field on any printed or displayed 50059 is left blank for any member with a Relationship Code F in the Member Record.
- The MAT10, Section 3 Member Record WILL contain the SSN.

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34

▸ Birth Dates for Fosters

- In addition, the Birth Date field will NOT be printed on the 50059.
- Site and CA software MUST ensure that the Birth Date field on any printed or displayed 50059 is shown as “00/00/YYYY” for any member with a Relationship Code F in the Member 3 Record.
- The actual Birth Date will be transmitted in the MAT 10 Member Record

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35	<h2 style="text-align: center;">New Member Special Status Code for FSS Participants</h2> <ul style="list-style-type: none">▪ A new code F has been added to identify members participating in the Family Self Sufficiency program.▪ Not all household members are required to participate in the FSS program.▪ The Special Status Code, MAT10, Section 3 Field 10, has been widened to 10 characters to accommodate this and possible future codes.▪ The former future code of F for frail elderly has been dropped.▪ HUD Form 50059 is not being modified at this time to allow more space for printing codes.▪ F = FSS-Family Self Sufficiency Participant (such individuals have executed an ITSP-Individual Training and Services Plan. ITSPs are attached to, and incorporated as part of, the CoP-Contract of Participation	
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36	<h2 style="text-align: center;">811 PRA</h2>	
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37

▸ Certification Data Entry

- The 203ACertificationDataEntry.xls spreadsheet has been corrected to add a rounding to the penny step in the calculation of imputed income from assets.
- Either the old or new calculation is acceptable prior to an OA's implementation of 2.0.3.A.

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38

▸ Terminations/Suspensions

- New Codes
 - RD = PBRA RAD Tenant Transferred During Rehab is being added to indicate a suspension occurring on or after the RAD Contract Effective Date to allow for renovation of the unit.
 - RH = PBRA RAD Tenant Transferred Prior to RAD Contract Effective Date for Rehab
- Added Later DE and OA

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39

▸ History Baselines

Required (all record types)
for both OA and CA software

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40

▸ Voucher Miscellaneous Requests

- SERV is no longer valid
- New Codes
 - RADZ
 - RADR
 - RADN
 - RDRV
 - RPMT
- HOTM Added Later

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41

▸ Voucher Miscellaneous Requests

- Three new fields are being added to the MAT30, Section 6, Miscellaneous Accounting Request record:
 1. HOH Last Name,
 2. HOH First Name and
 3. Unit Number.
- These are used in relation to RADN requests and for RDRV

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42

▸ Adjustment Cert Types

- On the voucher, the certification types applicable for Adjustment Records (MAT30, Section 4) are now all mandatory.
- The codes for full certification/UTs (AR-O, AR-I, IR-O, IR-I, IC-O and IC-I) were added late in the 202D process and were considered optional for 202D.
- With 203A UT-O and UT-I are no longer permitted for a full certification/UTs.

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43

▸ Voucher Billing for All Units

Rows for Assisted, Abated, Vacant, Market, and Rehab units will appear in the Regular Assistance billing part of the voucher (Section 3 Record)

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44

▸ Repayment Agreements/FSS Escrows

Major surgery.

Read the requirements carefully.

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45

▸ Origination of Data

Since certifications are legal documents that modify the lease, CAs may not edit them.

All certifications must originate with the OA.

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46

▸ PRACs and Failure to Recertify

- Upon review, HUD's Office of General Counsel has determined that a tenant's rent should not be changed while eviction is being pursued after a failure to recertify.
- Guidance on how to force tenant whose assistance is not zero or negative to operating rent had been introduced with TRACS 2.0.2.D and illustrated in the CalculatingTenantRent spreadsheet.
- As a result of the OGC opinion, that guidance is being removed. Since it is assumed that forcing a tenant to operating rent is a manual process in OA software, OA software vendors are instructed to tell their clients not to use that procedure.
- Removal of that process is mandatory for TRACS 2.0.3.A

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47

▸ Unit Swaps/Trades

- Site and CA software must support Unit Trades. A Unit Trade may be defined as
 1. Two households trading units (Household 1 moves from unit 101 to unit 102 and Household 2 moves from unit 102 to 101 simultaneously) and
 2. More than two households moving simultaneously (Household 1 moves from 101 to 102; Household 2 moves from 102 to 103; Household 3 moves from 103 to 101).

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48

▸ UTs and LIHTC

- LIHTC rules do not allow a UT between two buildings in a property unless they are formally part of a multiple building Tax Credit project.
- When not part of a multiple building LIHTC project, tax credit rules require a qualification certification for the new unit and the set of transactions is commonly implemented as a MO/MI pair of LIHTC certifications.
- However, HUD requires that a UT be done in this case—not a MO/MI.
- This means that the OA software must be able to handle the transfer both ways to satisfy the rules for the two programs.

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49

▸ Recert Notices

Recertification (AR)
Notices: Chapter 7 of HH
4350.3 and Chapter 4 of
MAT Guide calls for all AR
Notices to be sent until the
AR is completed/signed
unless there are
extenuating circumstances.

This ensures compliance
with the instruction provided
in HH 4350.3 R1, C4,
Paragraph 7-8 and HUD's
Clarification in the Q&A

Lanier M. Hylian

50

▸ Comments?



Lanier M. Hylian

51

Other Changes
That
You
Would Like to Discuss???

Lamar M. Hyton

52



53

▶ Action Items Identified in this Meeting

Lamar M. Hyman

54



55



Lamar M. Hyman