



3	<p style="text-align: center;">▶ <b>Panelists</b></p> <ul style="list-style-type: none"><li>▪ Lanier M. Hylton – HUD Multifamily Housing Programs</li><li>▪ Alisa Costello/Jerry Ledbetter – Pyramid</li><li>▪ Jed Graef - Housing and Development Software (HDS)</li><li>▪ Mary Ross – Ross Business Development (RBD)</li></ul>
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Lanier M. Hylton

4	<p style="text-align: center;">▶ <b>Bi-weekly Meetings</b></p> <ul style="list-style-type: none"><li>▪ Wednesday, June 7, 2023, 1:00 PM – 3:00 PM EDT</li><li>▪ <del>Wednesday, June 21, 2023, 1:00 PM – 3:00 PM EDT</del></li><li>▪ <del>Wednesday, July 5, 2023, 1:00 PM – 3:00 PM EDT</del></li></ul>
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TRACS Industry Working Group Sessions

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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.

TRACS Industry Working Group Sessions

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## ▸ Status of Forms Change

Lanette M. Hylen

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# ▸ Forms

2502-0182      2502-0204


Lanier M. Hyllon

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# ▸ Rollout Schedule

Updates to Rollout Schedule

Mandatory for TRACS to be updated by January 1.



Lanier M. Hyllon



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## ▸ MAT Guide Chapter Drafts

<p>Delayed Posting Edits Until 5/25/2023</p>	<p>Next Comment Deadline June 5, 2023</p>
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Lanier M. Hyllon

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## ▸ The Drafts

These are very raw drafts.

They still include notes and comments.

They still need formatting.

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## ▸ 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”.

Lanier M. Hydon

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## ▸ HOTMA

MAT Guide editors cannot provide clarification regarding implementation of HOTMA.

Inquiries should be sent to  
MFH\_HOTMA@hud.gov

Lanier M. Hydon



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▾ Edits Worth Noting

Lanette M. Hyman



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▸ Component 1 PH to PBRA RAD – AP at MI

HUD has confirmed that for Component 1 PH to PBRA RAD, AP may be zero or negative at MI.

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▸ Termination for Cause & the Phase-in Hardship Exemption

- Termination for cause stops the Phase-in Hardship Exemption.
- If IC, Health & Medical Expense Deduction and Attendant Care & Auxiliary Apparatus Expense Deduction equal expenses in excess of 10% of Annual Income.
- Do not apply these rules for Suspensions.

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## ▸ Proposed Special Asset Type

Concern was raised re: Data Entry Requirement for Non-essential Personal Property (Non-necessary Personal Property)

Asset Description Starts With  
NE

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## ▸ Proposed Special Asset Type

- Used to be Real Property – Yes or No
- Changed to Property Type
- Proposed Values:
  - R – Real Property (Only Section 8)
  - N – Non-necessary Personal Property (All)

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▸ Miscellaneous Accounting Requests  
– Chapters 5 & 7

- New Codes
- HOTM
- ~~OANG 5-23-1-3~~ Owner/agent reversal of negative voucher request.
- RADN
- RADZ
- RADR
- RDRV
- ~~RPMT~~

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▸ Miscellaneous Accounting Requests  
– Chapters 5 & 7

RPMT  
No longer in the list.

See new instructions for Repayment  
Agreements with a Status of MO

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▸ EIVP Miscellaneous Accounting Requests – Chapters 5 & 7

Proposed New Rule  
EIVP

Always round down so that an OA is never penalized more than 5%

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▸ Repayment Agreement Amount

Change from original instruction to use  
Improper payment  
less any “lump sum downpayment”

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## ▸ Repayment Agreement Amount

For Repayment Agreement Amount, use the entire improper payment amount.

If resident makes a “lump sum downpayment” record this as a payment.

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## ▸ Repayment Agreement Status Former Resident Still Paying

Changed original instruction for residents who have moved out but continue to pay.

**RPMT**  
**Miscellaneous Accounting Request**

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▸ Repayment Agreement Status  
MO

Post payments to the  
Repayment Record  
with a status of MO.

Include Repayment  
Agreement ID  
On  
The voucher.

Lauren M. Hydon

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▸ Repayment Agreement Status  
MO

Mask  
Resident First/Last Name

Mask  
Unit Number

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## ▸ New Use for MAT 70 Record – Hardship Chapters 5 & 6

- Do Not use IR to:
  - Start Health & Medical Expense Financial Hardship Exemption
  - Stop Health & Medical Expense Financial Hardship Exemption
  - Stop Childcare Expense Hardship Exemption
- Use OC MAT 70 (for Hardship Exemption)
- This is true as long as there is not another reason to create an IR (full/partial cert combo)

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## ▸ New Use for MAT 70 Record – Noncitizen Status Chapters 5 & 6

- Do Not use IR to:
  - Change citizenship status from:
    - Ineligible Noncitizen to eligible Noncitizen
    - Eligible Noncitizen to Ineligible Noncitizen
    - Ineligible Noncitizen to US Citizen
- Use OC MAT 70 (Change Noncitizen Eligibility Status)
- This is true as long as there is not another reason to create an IR (full/partial cert combo)

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## ▸ Fix a Problem When MAT 70 Accomplishes Multiple Tasks

Needs to Identify What's Happening

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## ▸ MAT 70 – 50059A

Can  
Change  
Other

- UT – Unit Transfer
- GR – Gross Rent Change
- OC – Start/Stop Hardship Exemptions or Change Noncitizen Status
- Maybe New SSN

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## ▸ MAT 70 Implementation Details

- Fields to indicate the type of change(s)
  - UT
  - GR
  - % Income Hardship Change
  - Child Care Hardship Change
  - Non-Citizen Change
  - SSN Change????
- More than one could be true
  - For example, a UT/GR would indicate Yes for both UT and GR

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## ▸ MAT 70 Implementation Details

- Other fields
  - Number Member Records
  - % of Income Value
  - Child Care Expense A
  - Child Care Expense B
  - HH Citizenship Eligibility

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## ▸ MAT 70 Implementation Details

- Doing this requires a Section 2 record to hold member data that is changing
  - Last and First Names
  - DOB
  - Relation Code
  - New Care Code
  - New NCR Status
  - New SSN???

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## ▸ Potentially – MAT 70 for SSN

Can a valid SSN be added with a correction instead of an IR (as currently required)

If not, can we use MAT 70?

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## ▸ New Rent Override Reason

### Rent Override Reason – Last call

PO – For POA project where the Rent Calculation is not standard

R1 - RAD Conversion IC – Component 1 PH to PBRA RAD Only

R2 - RAD Rent Phase-in – Component 1 PH to PBRA RAD Only

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)

OT – Other Reason Not Yet Defined by HUD.

RC – Component 1 Cap on Rent (%FMR possible)

RC trumps R1, R2, and R3

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## ▸ Proposal for New Process

Miscellaneous Accounting Request  
Related to RGRC – Retroactive GRC  
(requires HUD or CA Approval)

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## ▸ RGRC

<p>One lump sum?</p> <p>Lump sum by Unit Type?</p>	<p>Individual Transaction For Each resident in place On the effective date of the GR?</p>
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Lamar M. Hyman



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## ▸ Outstanding Questions

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## ▸ Phase-in Hardship Exemption

Does the Phase-in Hardship Exemption apply only if the resident remains on the same property or will this exemption transfer if the resident moves from one assisted unit to another assisted unit?

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## ▸ Phase-in Hardship Exemption

- If no – Are There Exceptions for:
  - VAWA
  - RAM
  - RAD Rehab
  - Involuntary Displacement (Fire, PDD, etc.)

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## ▸ PBRA RAD

- For Component 1 Conversion ICs & HOTMA
  - Can HOTMA changes trigger Phase-in?
- For Component 2 Conversion ICs & HOTMA
  - Will OAs complete a rent override if HOTMA causes an increase?

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▸ Income

How is Income Projected for AR/IRs


We know some methods, just not all methods.

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▸

Comments?



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## 2024 Certs

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### ▸ Proposal for 1/1/2024 & Later

- Best Practice is not submit 2024 certs before 12/10?
- Proposal - Hold all 2024 certs until 2.0.3.A?
  - Suspend 15 month rule?
- Proposal – Can the OA create a manual 2.0.3.A 50059 and override the rent on the 202D 1/1/2024 cert?

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▸ **Biggest Problem**

What happens if the OAs don't know.

Lamar M. Hydon

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▸ **Historical Baseline**

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## ▸ Historical Baselines

Site Software  
Required to  
Comply with Rule.

How is Compliance Monitored by HUD?

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Other Changes  
That  
**You**  
Would Like to Discuss???

Lanier M. Hyllon



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▸ Action Items Identified in this Meeting

Lanette M. Hyman



Lanette M. Hyman