TRACS Meeting

A Review

TRACS 2.0.2.C Implementation Considerations

Introduction

- Presentation centers on 202 C Implementation Considerations
- Questions regarding specific functionality
 - Occupancy
 - Technical/Software Implementation
 - Monitoring

202C Specification

• A copy of the 202C Specification document can be found on the HUD web site at

http://www.hud.gov/offices/hsg/mfh/trx/trxdocs.cfm

- Strongly recommend review of this document
- Critical changes that you should be aware of BEFORE the update is released.



202 C

General Considerations

Communication to Owner/Agents

- Owner/agent: continued communication to owner/agents
 - TRACSMail
 - RHIIP ListServ
 - Software Providers
 - CA/HUD

Implementation

Contract Administrators

- Mandatory implementation timeline
- Permission to change the timeline
 - CAs MUST be ready on day one (December 1, 2008)
 - Flexibility on the end of the transition as CAs have to have time to process site files. However, CAs should be expected to be able to receive and process 202B files through a minimum of March 20 or so (April voucher)

April 1 Implementation Deadline

- Alternatives for owner/agents if a CA does not meet the 2.0.2.C March 31, 2009 implementation deadline
 - Payment alternative
 - Penalty to CA
- HUD input necessary

Software Providers TRACS 2.0.2.C Release

- TRACS 2.0.2.C Update December 1, 2008
- Required no later than March 31, 2009
- TRACS will accept submissions in both the 202B and 2.0.2.C formats
- After February 28, 2009, TRACSMail will no longer work
- After March 31, TRACS will not accept 2.0.2.B files

Help Desks HUD & Software

- Communication of special contact information to the multi-family help desk
 - May reduce problem resolution time
 - Need to head a coordinated effort
 - Escalation protocol

202 C

Voucher Considerations

Changes to the Voucher Forms

- **Revised** HUD-52670-A Part 1 (Regular Assistance)
- New HUD-52670-A Part 3 (Adjustments)
- New HUD-52670-A Part 4 (Miscellaneous Accounting Requests)
- New HUD-52670-A Part 5 (Approved Special Claims)
- No Change to the HUD-52670 (Cover Page) or the HUD-52670-A Part 2 (Schedule of Special Claims)

Adjustments to Schedule of Tenant Assistance Payments Due

U.S. Department of Housing and Urban Development

Office of Housing Federal Housing Commissioner

Before completing this form, read and follow the instructions in the Monthly Activity Transmission (MAT) User's Guilde. See the statements on the form HUD-52670 for information on public burden.

1. Asst. Pymts Due For (mm/yyyy): 2. Project Name:					3. FHA / EH / Non-Insured Proj. No:			4. Sec	4. Section 8 / PAC / PRAC Contract No			5. Type of Subsidy:				
12/2007	Shady Valley Apartments					0000000			TN00000000			Section 8				
6.	7.	8. Adjusting Certification				9.	10. Calculation Detail			l.		11a.		11b.		
Head of Household Name Last, First, Initial	Unit Number	Prior or	ew Cert?		Effective Date	Asst. Pmt.	Adjustment Period	Beginning Partial Month			Full Months		Ending Partial Month		d	Approved (HUD/CA use only)
		New Billing?						No. of Days	Daily Rate	No. of Months	Monthly Rate	No. of Days	Daily Rate			
Normal Move-In	101	New	Y	МІ	10/12/07	350	10/12/07 - 11/30/07	20	11.29	1	350		3	5	76	
Normal Move-Out	102	Prior		AR	7/1/07	500	10/1/07 - 11/30/07			2	500			(1,0	00)	
Normal Move-Out	102	New		AR	7/1/07	500	10/1/07 - 10/4/07	4	16.13						65	
Normal Move-Out	102	New	Y	MO	10/4/07	0	10/5/07 - 11/30/07	27	0.00	1	0				0	
Normal Termination	103	Prior		IR	3/1/07	125	10/1/07 - 11/30/07			2	125			(25	50)	
Normal Termination	103	New		IR	3/1/07	125	10/1/07 - 10/15/07	15	4.03		1.000				60	
Normal Termination	103	New	Y	тм	10/15/07	0	10/16/07 - 11/30/07	16	0.00	1	0				0	
Double Subsidy Termination	104	Prior		м	9/18/07	380	9/18/07 - 11/30/07	13	12.67	2	380			(9)	25)	
Double Subsidy Termination	104	New	Y	TM-DS	9/18/07	0	9/18/07 - 9/30/07	13	0.00		2010/02/07				0	
Double Subsidy Termination	104	New	Y	IC	10/1/07	380	10/1/07 - 11/30/07			2	380			7	60	
Normal Unit Transfer	105	Prior		AR	7/1/07	318	10/1/07 - 11/30/07			2	318			(6:	36)	
Normal Unit Transfer	105	New		AR	7/1/07	318	10/1/07 - 10/12/07	12	10.26						23	
Normal Unit Transfer	105	New		UT-O	10/12/07	0	10/13/07 - 11/30/07	19	0.00	1	0				0	
Normal Unit Transfer	106	New	Y	UT-I	10/13/07	323	10/13/07 - 11/30/07	19	10.42	1	323			5.	21	
Normal Gross Rent Change	107	Prior		AR	2/1/07	415	8/1/07 - 11/30/07			4	415			(1,60	30)	
Normal Gross Rent Change	107	New		AR	2/1/07	415	8/1/07 - 8/11/07	11	13.39					1-	47	
Normal Gross Rent Change	107	New	Y	GR	8/12/07	418	8/12/07 - 11/30/07	20	13.48	3	418			1,5	24	
Multiple Retro Corrections	108	Prior		AR	2/1/07	228	2/1/07 - 3/17/07			1	228	17	7.35	(3	53)	
Multiple Retro Corrections	108	Prior		GR	3/18/07	230	3/18/07 - 8/11/07	14	7.42	4	230	11	7.42	(1,10	06)	
Multiple Retro Corrections	108	Prior		GR	8/12/07	232	8/12/07 - 8/31/07	20	7.48		2100 Barris			(1)	50)	
Multiple Retro Corrections	108	Prior	19525	IR	9/1/07	250	9/1/07 - 11/30/07			3	250	3350	1000000		50)	
Multiple Retro Corrections	108	New	Y	AR*	2/1/07	230	2/1/07 - 3/17/07	1000	233733	1	230	17	7.42		56	
Multiple Retro Corrections	108	New	Y	GR*	3/18/07	232	3/18/07 - 8/11/07	14	7.48	4	232	11	7.48	1,1		
Multiple Retro Corrections	108	New	Y	GR*	8/12/07	234	8/12/07 - 8/31/07	20	7.55						51	
Multiple Retro Corrections	108	New	Y	IR*	9/1/07	252	9/1/07 - 11/30/07			3	252			7	56	
			i					12 Tot:	als for this p	age				(6)	76)	

Adjustment Totals by Unit

Proposal to allow for a totaling options for the voucher adjustment page (by tenant/unit)

Retroactive Voucher Adjustments

- Affecting transactions that were originally posted using 202B calculations
- Mandatory CA/HUD policy
- Covered in Appendix H

Implementation Issues

- What to do, when a certification that was originally adjusted using other methodology (not calculated using the 202C procedures). is corrected
- Three logical possibilities:
 - 1. Recalculate the old adjustment using the old methods and calculate the new one using the new rules.
 - 2. Pretend that the old adjustment was done using the new methods and proceed as you would when correcting a certification that was adjusted using the new methods.
 - 3. Calculate the changed adjustment using the methods in place prior to 2.0.2.C.
- Decided on option 2
- This solution may cause a burden on accounting software at the site level

Changes to the Voucher Reported On Date

- Change to the "voucher reported on date" process.
- HUD will implement a new report timing rule
- HUD has implemented the following rule:

Except for ARs (which are always effective on the first), IRs and ICs effective on the first of the voucher month, no transaction that is effective after the first of the month prior to the voucher date can be reported on that voucher.

This chart provid	es an example of what	cample of what happens when a voucher is created. The example shows the first month that a given cert may appear on the voucher.											
	Section 8, PAC, PRAC												
Cert Type Eff July 1		Eff July 2-10	Eff July 11-31	Eff Aug 1	Eff Aug 2-10	Eff Aug 11-31							
	Voucher Month												
AR	July assumes AR was completed when July voucher was created	N/A	N/A	Aug assumes AR was completed when Aug voucher was created	N/A	N/A							
IR	July assumes IR was completed when July voucher was created	September	September	August assumes IR was completed when Aug voucher was created	October	October							
IC	July assumes IC was completed when July voucher was created	September	September	Aug assumes IC was completed when Aug voucher was created	October	October							
MI	August	September	September	September	October	October							
МО	August	September	September	September	October	October							
TM	August	September	September	September	October	October							
GR	August	September	September	September	October	October							
UT	August	September	September	September	October	October							

O/A Objection To Signing Vouchers

- Some OAs concerned that data is not correct
- New policy moves cut-off date for a cert appearing on the voucher from the 10th to the 1st
- Certifications effective after the first are still submitted to TRACS
- Certs reflect what is going on at the property
- Only impact is certifications will be billed on a later voucher

Compliance Percentage

- Impact on compliance percentage
- Need to monitor for first couple of months
- Manual release of vouchers may be in order

Summary Vouchers

Additional Considerations?

Summary of Action Items

202 C

Certification Considerations

Daily Submission Of Certifications

 As required in HUD Handbook 4350.3 Revision 1, Change 2, Figure 9-2 (Paragraph 9-5)

Figure 9-2: Deadlines for TRACS Submissions

Section 8, PAC, and PRAC Properties. The deadline for transmission of vouchers

RAP and Rent Supplement Properties. The deadline for transmission of vouchers (form HUD-52670) and all related TRACS files supporting the voucher is <u>the 10th</u> calendar day of the voucher payment month......

The voucher requesting payment for assistance must be submitted within 60 calendar days from the due date.....

An approved special claim must be submitted within 90 calendar days.....

HUD-50059s should be submitted throughout the month as the completed data is available. HUD-50059s supporting a voucher must be transmitted prior to voucher transmission.

Compliance with the Rule

- Requirements for HUD/CA to accept and forward certs
- Requirements for vendors to allow to send certifications as they are complete
- Allowable exceptions
- Effect on the compliance percentage
 - Over and under 100%
 - Effective change with new "voucher reported on" methods

Corrections

Impact of cert recalculation on corrections UTs and GRs

Standardizing Rounding

- HUD Handbook 4350.3 Change 27 and the newer HUD Handbook 4350.3, Revision 1 clarified and changed:
 - How certifications should be calculated and
 - How rounding should be done
- TRACS was never updated
- Software vendors have implemented slightly different calculation methodologies.

Vendor Requirements

- Vendors are required to use the new algorithms
 - TRACS 2.0.2.C
 - All Site Software
 - All CA Software
 - All Service Bureau Software

Financial Calculations

- All financial calculations involving multiplication or division must be done as follows:
 - **1.** Calculate the result to 6 or more decimal places (5.003399)
 - 2. Round the value to the nearest penny (5.003399 becomes 5.00)
 - 3. If applicable, round the result to the nearest dollar, rounding up at .50
 - 5.00 becomes 5
 - 5.50 becomes 6
 - 5.49 becomes 5

Complete Each Calculation

- Calculations should be done in steps
- Example: 30% of monthly adjusted not implemented as ((Adjusted / 12) * .3) but rather as multiple steps:
 - 1. Adjusted Income/ 12 (calculate the result to 6 or more decimal places)
 - 2. Round the result to the nearest penny to get Monthly Adjusted
 - 3. Monthly Adjusted * .3 (calculate the result to 6 or more decimal places)
 - 4. Round the result to the nearest penny to get 30% of Monthly Adjusted

Assets and Rounding

- Each asset rounded to the nearest dollar.
- Rounded values
 - Reported in a MAT file and
 - Used in other calculations.
- Income from **each** asset reported as a value rounded to the nearest dollar.
- When calculating an asset income by multiplying its value by an interest rate:
 - **1.** Multiply the rounded asset value by the interest rate
 - 2. Round the result to the nearest penny
 - **3.** Then round to the nearest dollar

Imputed Assets & Rounding

- Imputed Income is calculated by multiplying applicable Passbook Rate by the Total Assets value if greater than \$5,000
- Result should be:
 - **1.** Calculated to 6 decimals
 - 2. Rounded to the nearest penny
 - **3.** Then to the nearest dollar

Total Assets & Income from Assets

- Total Assets and Total Income from Assets
 - Sums of the individual rounded asset values and
 - asset incomes
- Should never be a discrepancy if the assets are rounded correctly.
- CA software and TRACS should report discrepancies of \$1 or more starting with 202C

Mid-month Interims

- Clarify the situation this change is addressing
- For interim certifications reflecting a change in household composition, there are four basic situations:
 - 1. An interim certification removing a household member who <u>is not</u> going to receive HUD assistance in another unit
 - 2. An interim certification adding a household member who was not receiving HUD assistance in their former unit
 - 3. An interim certification removing a household member who<u>is</u> going to receive HUD assistance in another unit
 - 4. An interim certification adding a household member who was receiving HUD assistance in their former unit

Objective

- Rules have NOT changed first two scenarios
- Rules have changed for options 3 and 4
- Eliminate "double dipping"

Result of the Change

- Resolve the conflict between
 - Handbook rules for interim certifications and
 - Prohibition against double dipping
- HUD approved use of a mid-month interim to
 - Avoid double dipping
 - Allow the new household member(s), to start receiving subsidy immediately

Rule of Thumb

Please remember to use this rule ONLY in the cases where the change would result in dual subsidy.

If the change would not result in dual assistance for example, one household member is moving to a nursing home - the current rules apply.

Unanswered Questions

- Policy guidance regarding inconsistency in Handbook requirements
 - Possible addendum
 - Rent Increase versus Rent Decrease
 - Impact when change is retroactive (penalty to OA)
 - Monitoring requirements
 - Allowable manual change to the voucher by CA
 - Policy requirements regarding resident credits due to mid-month subsidy increase

<u>50059 - MAT 10</u>

• Included Transactions

- Move in
- Annual
- Initial
- Interim

- HUD has modified guidance surrounding use of the HUD-50059
- This form only used when an OA is submitting one of these transactions.
- New HUD-50059A form for partial certifications

Partial & Full with Same Effective Date

Use of MAT 10 that includes partial cert transactions

(UT/GRC)

New 50059 Instructions

- Fred Hutchins
- EPS has developed New Instructions

Asset Field Width Increase

- Growing number of households whose asset values and totals exceed MAT fields
- This will affect:
 - MAT10, Section 2, Field 29 Total Assets
 - MAT 10, Section 5, Field 6: Cash Value Amount



Special Status Code

- Special Status Code de Antifición, has been updated •Receive a dependent allowance
- Added new values dowance (K', and the value 'J' Count for determining income limits and unit size if they have the "K" has been redefined
 - •Dependents with a Special Status Code of "C"
 - •Do not receive a dependent allowance
 - •Can qualify for a childcare allowance
 - •Count for determining income limits and unit size if they have the "K" status code set.
 - •Dependents with a Special Status Code of "K" are
 - •Present in the unit 50% or more of the time
 - •Count for determining income limits and unit size

Member Eligibility Code

- Changed the assistance provided to families whose eligibility has not been verified
- Previously, families whose citizenship status had not been verified received full assistance until the eligibility status for each family member had been determined
- HUD 4350.3 REV-1 changed this to provide for prorated assistance at admission

New Codes



- Spaces = not applicable (BMIR, PAC, PRAC)
- EC = individual is a citizen or national
- EN = individual is a noncitizen with eligible immigration status
- IC = Ineligible noncitizen child of a family head or spouse
- IN = Member is an Ineligible Non-Citizen.
- IP = Ineligible Parent of a Head of Household or Spouse.
- PV = Individual's eligibility status is pending verification documents have been submitted. Member is treated as eligible for calculating assistance.
- ND = Documentation not submitted (New Code). Member is treated as ineligible for calculating prorated assistance.
- XX = Individuals who are not counted as members of the family (i.e., foster children, live-in attendants, foster adults). Field 7 shows a relationship code of "F" or "L" for these individuals.

Race and Ethnicity Categories

- MFH collected race and ethnicity at the household level
- OMB mandated changes modify the descriptions of the race and ethnicity categories
- Shift the race and ethnicity association from the household to the individual members
- Residents may select all race categories that apply

New Race & Ethnicity Fields

- Ethnicity Codes:
 - 0 = Tenant Declined to Report
 - 1 = Hispanic
 - 2 = Non-Hispanic



- Race Field Names:
 - American Indian or Alaska Native,
 - Asian
 - Black or African American
 - Native Hawaiian or Other Pacific Islander
 - White
 - Other
 - Tenant Declined to Report

Date Divested Activated

- Has been a "future field" in the Asset Record.
- Enable software to accurately validate Imputed Asset values
- Imputed Asset will be required to include the Date Divested
- If the effective date is greater than or equal to twoyears after the Date Divested, the imputed asset value cannot be used in total asset income

50059-A

New one-page form for partial certifications: Move Outs, Terminations, **Gross Rent Changes** and Unit Transfers

Owner's Certification of Compliance U. S. Department of Housing with HUD's Tenant Eligibility and Rent Procedures

And Urban Development

Office of Housing Federal Housing Commissioner NOT for submission to the Federal Government Landlord's Official Record of Certication

> OMB Approval Number 0000-0000 (Exp. 00/00/0000)

Acknowledgements

Read this before you complete and sign this form HUD-50059 A

Public Reporting Burden. The reporting burden for this collection of information is estimated to average 55 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (2502-0204), Washington, DC 20503. The information is being collected by HUD to determine an applicant's eligibility, the recommended unit size, and the amount the tenant(s) must pay toward rent and utilities. HUD uses this information to assist in managing certain HUD properties, to protect the Government's financial interest, and to verify the accuracy of the information furnished. HUD or a Public Housing Authority (PHA) may conduct a computer match to verify the information you provide. This information may be released to appropriate Federal, State, and local agencies, when relevant, and to civil, criminal, or regulatory investigators and prosecutors. However, the information will not be otherwise disclosed or released outside of HUD, except as permitted or required by law. You must provide all of the information requested, including the Social Security Numbers (SSNs) you, and all other household family members age six (6) years and older, have and use. Giving the SSNs of all family members age six (6) years and older is mandatory; not providing the SSNs will affect your eligibility. Failure to provide any information may result in a delay or rejection of your eligibility approval.

Privacy Act Statement. The Department of Housing and Urban Development (HUD) is authorized to collect this information by the U.S. Housing Act of 1937, as amended (42 U.S.C. 1437 et. seq.); the Housing and Urban-Rural Recovery Act of 1983 (P.L. 98-181); the Housing and Community Development Technical Amendments of 1984 (P.L. 98-479); and by the Housing and Community Development Act of 1987 (42 U.S.C. 3543).

Owner's Certification - I certify that this Tenant's eligibility, rent and assistance payments have been computed in accordance with HUD's regulations and administrative procedures and that all required verifications were obtained.

Warning to Owners and Tenants. By signing this form, you are indicating that you have read the above Privacy Act Statement and are agreeing with the applicable Certification.

False Claim Statement. Warning: U.S. Code, Title 31, Section 3729, False Claims, provides a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages for any person who knowingly presents, or causes to be presented, a false or fraudulent daim; or who knowingly makes, or caused to be used, a false record or statement; or conspires to defraud the Government by getting a false or fraudulent claim allowed or paid.

	Partia	al Certification		
Name of Project	Project Number	Subsidy Type	Contract Number	Transaction Type
Head of Household (Last, First, Initial)		Unit Number	No. of Bedrooms	Effective Date
Head ID Code (SSN)	Head Birth Date	Building ID	0	Anticipated Voucher Date
Move	Gross Rent Changes and Unit Transfers			
Move Out Code Date of Death of Sole Member		Prev. Unit No. (UT's only) Contract Rent Utility Allowance Gross Rent Total Tenant Payment Tenant Rent Utility Reimbursement Assistance Payment Security Deposit		
Terminations Termination Code Description				
	S	lignatures		
Head of Household	Date	Owner/Agent		Date
Previous versions of this form are obsolete	*	Page 1 of 1		form HUD-59059 A (12/2007) HB 4 390 3 Rev 1

Changes to Termination Codes

- New termination codes
 - Ineligible student and to deal with a
 - Termination due to double subsidy at movein.
 - HQ termination date has been specifically defined.

- Valid Termination Codes:
 - **TI**
 - **TC**
 - **TR**
 - **TF**
 - CE.
 - Not for use when renewal is delayed.
 - **ST**
 - DS
 - Note: LR = Did not re-certify on time. This is a legacy code applicable only to transactions with effective dates less than or equal to the TRACS 2.0.2.B to 2.0.2.C transition date.

Certifications for Market Rate Residents

- Previous versions of the Special Claims Guide did not allow for special claims for unpaid rent and damages if the resident was a "market rate" resident at move out
- Current Special Claims Guide allows OA to apply for a Special Claim for unpaid rent and damages for a market rate resident

Special Claims Guidance

"The owner is eligible to submit a special claim for unpaid rent, other charges due under the lease and damages if:

The former resident was receiving rental assistance at move-out; or if the rental assistance had been terminated prior to move-out, the assistance was terminated based upon the resident's failure to comply with his/her responsibilities to fulfill program requirements, such as:

- Failure to provide the needed information relating to family composition and income
- Failure to provide social security numbers
- Failure to sign consent forms and or verification forms
- Failure to sign the form HUD-50059
- Failure or inability to establish citizenship or eligible immigration status
- Failure to move to a different-sized unit within 30 days after the owner notifies him/her that the unit of the required size is available

Note: Owners cannot submit a special claim for the unit when termination of rental assistance was based on the resident's income increasing to where he/she no longer qualifies for assistance."

Vacancy, Unpaid Rent & Damages

- HUD requires a move-out or unit transfer in TRACS
- S8 resident is
 - Terminated for failure to follow handbook rules and
 - Subsequently moves out or transfers
- If a special claim is filed site software must transmit the
 - Move-out

MO/UT When No Special Claim

- No requirement for sites to submit move-out or unit transfer for previously subsidized tenants who are not associated with a special claim
- CAs may not require such transmissions

MO/UT for Market Renter

- Consider the "next recertification date" on the last MAT 10 in TRACS
 - If MO transaction is no more than 3 months after the "next recertification date", the MO will be accepted.
 - If the MO effective date is after the three-month grace period, TRACS will return Fatal Error F0185.
 - Help Desk manual move-out if more than 15 months

Example 1

- Last AR Effective 12/1/2007
- Next re-cert date 12/2008
- TM effective 7/1/2008
- Resident Moves out 8/31/2008

• Electronic MO works?



Example 2

- Last AR Effective 5/1/2007
- Next re-cert date 5/2008
- TM effective 3/1/2008
- Resident Moves out 9/10/2008

• Electronic MO works?

NO

Move out Request Form

Find the Multi-Family Move Out Request form on the HUD/TRACS web site at <u>http://www.hud.gov/offices/hsg/mfh/trx/pdf/tracsm</u> <u>oveoutrequest.pdf</u>

- If you report to a Contract Administrator, submit the form to the CA
- If you are reporting to HUD (non-Section 8), submit the form to the Multi-family Help Desk

TM = MO

- CA software MUST consider terminated residents as moved out for occupancy purposes.
- If a CA receives a move-in for a unit occupied by a terminated resident, the CA must not reject the transaction
- It would be acceptable to issue an informational message saying that the previously terminated resident is no longer being considered as residing in the unit

Additional Information

- HUD guidance to CAs regarding processing requirements
- Communication to Help Desk regarding processing requirements
- Success indicator acknowledging action for owner agents
- Requirements for CA to forward such acknowledgement to OA

Correct A Move-out

- In 2.0.2.C both 'Move-Out Date' and 'Move-Out Code' can be corrected
- A Headquarters (HQ) move-out can be corrected in the same manner
- Often a user wishes to change the 'Move-Out Date' for an HQ Move-Out to replace the TRACS determined Move-Out Date with another value.

Owner/Agent Initiated MO

- MO can now be corrected
 - Move-Out Date and
 - Move-Out Code
- Corrected by submitting a subsequent Move-Out (MAT40) transaction with new values for one or both fields

HQ Initiated MO

- User wishes to change the 'Move-Out Date' for an HQ Move-Out
- Replace the TRACS determined Move-Out Date
- TRACS currently does not allow the new Move-Out Date to be greater than the Headquarters (HQ) move-out date.
- HQ123 message indicates one of your residents has moved in to another subsidized property
- Investigate immediately

HQ Move Out Messages

- HQ123 message
 - One of your residents has moved in to another subsidized property
 - Investigate immediately

What's Going On?

- If resident is still in residence, determine the facts
 - If the resident has given notice, you should submit a move-out effective on the actual move-out date (not the date indicated on the notice unless they are the same)
 - If the resident has not given notice, determine whether you are dealing with a skip or whether the resident is planning to move but has not given notice.

Investigate

- Move-out record should record
 - The actual move-out date or
 - The date on which you gain possession of the unit in the case of a skip.

(There have been cases where a resident on a waiting list in another property has been moved in by mistake,

so do not assume that an actual move-in has occurred.)

MA003

- MA003 message indicating that one of your recently moved-in residents has moved out from another subsidized property after your move-in date, perform the following:
 - 1. Verify with the other property, that the move-out date is correct and in agreement with the examples in the table
 - 2. Charge the resident market rent starting with the original move-in date and through the move-out date indicated in the MA003 message.
 - 3. Terminate the resident effective on the move-in date using the new DS termination code to indicate that no subsidy is earned for the termination day.
 - 4. Create an initial certification effective the day after the effective date of the move-out from the former property to establish the start of subsidy in the new property
 - 5. Check the voucher adjustment, on the next voucher, refunding subsidy from the original move-in effective date through the day prior to the initial certification effective date.

Required Action

- Move-out will be accepted and the new property
 - Will be notified and
 - Must charge market rent from the original property move-in date through the move-out date from the old property.

- The new property must
 - Terminate the resident effective on the move-in date
 - Use the new DS termination code

Following Up on Errors

- Errors not stored in TRACS "Certifications with Discrepancies Query"
- Requirement for disclosing information about properties identified in the message
- Required Help Desk Support/CA support to enable OAs to investigate potential cases of dual subsidy
- Requirements to re-send or correct unrecorded MO

Additional MAT Guidance

- Treatment of TM associated with MAT 10 effective within last 15 months when household or household member moves to new unit/property
- Explanation of DS termination code
- Explanation of CA/HUD requirement to determine actual MO date
- Consistent application of policy guidance regarding resolution of disputes between OAs

CA/HUD Intervention

- CA or HUD office may be asked to adjudicate a dispute
 - Sole task is to determine the move-out date
 - Date determines the end of subsidy in the old unit
 - Start of subsidy in the new unit
 - Previous property is entitled to subsidy through the move-out date
 - New property is entitled to subsidy starting the day after the move-out date

Move-out vs Skip

- The difference between a skip and a 0-day notice situation
 - Actual move out date is known in 0-day notice
 - Skip
 - Discovering the fact of the move-out is not necessarily the date you get legal possession of the unit
 - In some jurisdictions, owners have to get a court order to take possession of the unit if anything has been left behind.

HUD Compliant Move Outs

- Some owner/agents have a policy of submitting a move-out effective the last day of the month even if the notice period ends earlier
- Others submit a move-out effective at the end of the notice period even if the resident moved out earlier.
- Neither practice is appropriate.

Formal Definition

- Move-out date is always
 - The actual move-out date or
 - The date that the owner takes possession of the unit in the case of a skip

	Old Property			New Property	
Notice	Actual MO Date	Reported MO Date	Last day of subsidy	Actual MI Date	First day of subsidy
30 Days	12/31	12/31	12/31	1/1	1/1
30 Days	12/31	12/31	12/31	12/31**	1/1
30 Days	12/31	1/1 or later*	12/31	1/1	1/1
30 Days	12/31	12/31	12/31	12/25**	1/1
Skip-No notice	12/31 = Date Management Takes Possession	12/31	12/31	12/25**	1/1
0-29 Days	12/31	12/31	12/31	1/1	1/1
0-29 Days	12/31	12/31	12/31	12/31**	1/1
0-29 Days	12/31	1/1 or later*	12/31	1/1	1/1
0-29 Days	12/31	12/31	12/31	12/25**	1/1

50059-A Corrections

- GRC, UT, TM Corrections
- Considerations when transaction is retroactive

Implementation/Transition

- Signature/submission requirements
- 50059s created and signed before 202C implementation (by site) but sent after 202C implementation
- Signature dates on GRC with utility allowance change (change in resident contribution)



