

# TRACS 202D Certifications

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# 202D Spec Status

- Published at the end of July
- Monthly working group conference calls to deal with clarifications
- A revision was published last week

# Spec Changes Since July

- Chapter 4
  - 4.38.3—incorrect reference changed from 4.34 to 4.35
- Chapter 5—M(mandatory) to M\*(allows zero)
  - MAT10-5, Field 6-Cash Value Amount
  - MAT15, Field 26-Number of Bedrooms
  - MAT70, Fields 15, 16, 20-Tenant Rent; TTP; Assistance
  - MAT91, Field 5-# Bedrooms
- MAT10-2
  - Field 56—field width was not specified-Adjusted Income
  - Field 48--Market for 236 must not be less than basic
  - Field 68--Basic may not be greater than market

# Changes--2

- Appendix H
  - Tweaks to the voucher adjustment presentation rules
- 202DAdjustmentExamples.pdf updated to reflect changes and clarifications to Appendix H
- Appendix J—A Reference in the Text Corrected
  - Was 202DMATChap06.docx
  - Now 202DMATChap05.docx
- Noncitizen Rule Proration Spreadsheet
  - 202DNonCitizenRuleProration.xlsx
  - Updated to reflect the requirement that 236 Market Rent must be greater than or equal to 236 Basic Rent

# Changes--3

- Special Claims Rounding Spreadsheet
  - 202DSpecialClaimsRounding.xlsx
  - Corrects an error in the 52671-C (Regular Vacancy Claims) examples for PDSA that has been there since 202C.
    - 202C Example 2—Unit re-rented in month following MO.
    - Unit was ready on the 3<sup>rd</sup> and rented on the 3<sup>rd</sup>.
    - Days vacant should be zero (0) was 2.

# Changes--4

- The PDSA rules:
  - First Month
    - The first month is defined based on the MO date. If the MO date is 1/31 the first month is January.
    - Claim amount is limited to number of days vacant in the first month where the vacancy period starts on the date the unit is ready for occupancy.
    - If the unit is not ready in the first month, the claim for the first month is \$0.
  - Second Month
    - Defined as the month after the first (MO) month.
    - The second month claim is based on the number of days vacant in the second month.
    - If the unit is ready for occupancy in the first month, the number of days vacant in the second month is the day the unit was re-rented minus 1. (Example 2)
    - If the unit is ready for occupancy in the second month, the number of days vacant is the rental date minus the make ready date. (New example 3)
    - If the unit is not ready until after the second month, the claim for the second month is \$0.

# A Proposed Spec Change

- The MO Codes Include:
  - 2 = Owner initiated--other
  - 3 = Tenant initiated—other
  - 11 = Other
- Code 11 is redundant to 2 and 3
- Suggest we eliminate 11 and decide whether the description field is to be filled for both 2 and 3.



# Items for Discussion

- DUNS Numbers
  - Required for Section 8 and PRACs
  - OK to fill for others?
- IR in lieu of GR/UT
  - Software must support partial corrections
  - This is especially critical in 202D
  - It is not appropriate for CAs to ask for full certs in lieu of a GR or UT correction.
  - Unfortunately, the Help Desk often recommends doing this.



# Items for Discussion-2

- Use of the Rent Override Field
  - The 4350.3, Chapter 5, paragraph 5-30 states that, where multiple funding programs or subsidy types apply, generally the benefit goes to the tenant and the lowest rent prevails.
  - Examples:
    - Tax credit rent lower than the 236 or BMIR rent
    - Terminations where the tax credit rents are lower than the contract rent
    - POAs with project specific rents
    - An exception to the lowest rent rule is a Section 8 or Rent Supp recert with tax credits. “If the family’s income has increased since move-in to a point that the assisted rent exceeds the Low Income Housing Tax Credit rent, that family will have to make a choice between the lower tax credit rent and the security of continuing on the rental assistance program.”

# Items for Discussion-3

- BMIR with Section 8: “A family receiving Section 8 assistance at a BMIR project would continue to pay the tenant rent based on the Section 8 rent formula until the TTP equaled or exceeded the BMIR rent. Thereafter, the family would pay rent based on the BMIR rent formula.”
- NEW-Forcing a PRAC tenant to operating rent for failure to recertify (7-8.D.3.b) “**NOTE:** In a Section 202 PRAC or 811 PRAC project, the tenant will pay the greater of operating rent or 30% of income until eviction procedures are completed.”

# Items for Discussion-4

- Use of the EIV Indicator
  - Blank if not a cert that is the result of use of the EIV system. Y if the cert is the result of the use of the EIV system.
  - If use of the EIV system is the cause of a correction to a full certification (AR\*, IR\*, MI\*, IC\*) the indicator is set to Y. Do not set the indicator on a current (uncorrected) AR. If an IR is being added (not a correction) as a result of EIV information, the indicator is set to Y. For partial certifications, the indicator is set for a UT or GR if it is being corrected as a result of a change to a full certification whose EIV Indicator is set to Y. Similarly, if the result of use of the EIV system is the termination or eviction of a household, the indicator is set on the TM or MO.

# Items for Discussion-5

- Use of the Extenuating Circumstances Code
  - 1 = Medical
  - 2 = Late annual certification due to accommodation or extenuating circumstances.
  - 3 = Late annual certification due to owner/agent delay
  - 4 = Late annual certification due to third party delay (for example-Guardian)
  - 5 = Military Deployment
  - 6 = Eviction
  - 7 = Court order
  - 8 = No Signature Required (Retroactive GR done after a MO- no requirement for a tenant signature – See Par 9-8)
  - 9 = No signature required for 60 days (based on anticipated voucher reported on date). An example would be a retroactive GR where the tenant rent changes. A signature is required but the cert may be transmitted immediately and the signature collected within 60 days.
  - 10 = Other

# Items for Discussion-6

- Certification Signature Rules
  - What is new is that a full cert corrected by a GR may now be transmitted along with the rest of the GR transactions with just an OA signature.
  - However, if there are other changes on the cert a tenant signature is needed.
  - Also, if a full cert has not yet been transmitted and a GR is applied to it prior to transmission, signatures are needed.
  - Just previously transmitted full certs corrected by GRs may be sent without a tenant signature.

# Items for Discussion-7

- Member Relation Codes
  - L → F or L or N
  - Corrections of 202C full certs where L = FLN
    - GRs—the relation code may be left as is
    - Regular corrections
      - The code may be left as is or corrected at OA discretion.
    - Keep in mind that, starting 5/1/09, income became reportable for fosters.

# Items for Discussion-8

- Member SSN Exception Codes
  - C = Does not contend eligible immigration status
  - E = Elderly AND subsidized on 1/31/10
  - M = New member under the age of 6—90-180 day grace period
- C and E apply at MI or IC but not M
- M applies only to in-place tenants adding a young member.



## Items for Discussion-9

- IR/UTs—The new rule
- If, at the time of the UT, there are member or income changes that would normally be reportable on an IR, they are reported as an IR/UT effective on the UT date.
- The IR/UT may be effective on any day of the month.
- If an IR has already been transmitted for a future date and a UT takes place prior to the IR and changes that drove the IR happened on or prior to the UT, the UT is done as an IR/UT and the changes are included.



# Items for Discussion-10

- Presidentially Declared Disasters (4350.1, Chapter 38)
  - If renting to a household displaced by a disaster or allowing a displaced member to be added to a household, be clear on all of the requirements of the handbook.