

Asset Management Project Groupings Frequently Asked Questions

1. How should I assign buildings/projects that have been previously demolished or disposed?

Buildings that have been demolished or disposed appear in PIC but are marked accordingly. PHAs should assign them AMP numbers the same way that other buildings are assigned AMP numbers. If the buildings that have been demolished/disposed are part of an existing site, they should be assigned to that site, i.e., partial demolitions. However, if these buildings are part of a site that no longer exists, the PHA should assign the demolished site a new AMP number. Remember, under the new Operating Fund Rule, buildings that have been demolished/disposed will receive an asset-repositioning fee for 3 years following demolition.

2. When do I assign an administrative building the “009999” number rather than a regular AMP number?

All buildings in the PHA’s inventory that have “utilities” must be assigned an AMP number, whether they contain residential units or not. (A non-residential building with utilities could potentially be used by a resident/the public and, hence, receive a physical inspection under the Public Housing Assessment System or PHAS.)

When an administrative building is located on the grounds of a project, it should be assigned the same AMP number as that project. However, if that administrative building (say, the PHA’s central office or its central warehouse) is not located on a project, it should be assigned, with one exception, the “009999” number. These off-site buildings will become part of the central office cost center. The one exception is for PHAs of fewer than 250 units that do not convert to asset management. For these PHAs, there is no “central office cost center” since everything is considered part of the one project. In these cases, the administrative buildings would be assigned the same AMP number as the consolidated project.

3. If I’m not making any changes in project groupings, do I still have to enter new AMP numbers?

Yes. Even if a PHA is not making any changes in current configuration, it must assign AMP numbers. A PHA may then simply assign each development the same number as exists today. It is extremely important that the PHA staff, particularly the site managers or whoever is going to assist on the REAC Physical Inspection, know the new AMP configuration so the sampling of the buildings and units reflects the correct new AMP profile and not the previous PIC development project number profile.

4. How should I report buildings that are included in mixed-finance projects?

Frequently, mixed-finance projects get built in phases, often as a result of the availability of tax credits and other outside funding sources. All mixed-finance projects should

receive separate AMP numbers. If each phase of a mixed-finance project is a separate legal entity, then each phase should have a separate AMP number.

5. How should mixed-finance projects with “floating” ACC units be reported?

Generally, PHAs which have floating ACC units in mixed-finance projects should report all buildings in PIC (since a public housing resident could potentially live in any building). However, if some buildings in a mixed-finance grouping are reserved for market-rate units only, those buildings would be excluded.

6. I’m a PHA with fewer than 250 units. If I combine all my units into one project, how will REAC inspect this new project?

REAC will inspect the new “project” using the AMP designation that the PHA has provided, as it would any other project, i.e., based on recognized sampling methodologies. REAC will likely inspect a statistically valid sample of buildings and units but only the “project” will receive a score.

7. I’m a PHA with fewer than 250 units. If I maintain my separate developments, and don’t combine into one project, will I need to submit financial statements on each project?

Yes. The new AMP numbers will be controlling for purposes of project-level financial reporting.

8. I’m an MTW agency. Do I need to comply with these new AMP requirements?

Yes. MTW agencies are not exempt from the AMP assignment process.

9. As a PHA with fewer than 250 units, can I have one project and still receive the asset management “add-on” of \$2 PUM?

No. PHAs with fewer than 250 units that either combine all units into one project, or that only have one building/one project, are not eligible to receive the \$2 PUM asset management add-on.

10. As a PHA with fewer than 250 units, can I still apply for stop-loss? Can I apply if I group all my units into one project?

PHAs with fewer than 250 units can, with one exception, apply for stop-loss. The exception is for PHAs which have sites that would otherwise reasonably be recognized as two separate projects, but where the PHA has combined all units into one project. These PHAs will not be eligible for stop-loss. For example, if a PHA has two 100-unit senior buildings on opposite ends of town, these buildings would normally be treated as two projects. If the PHA combined these projects, it would not be eligible for stop-loss. However, if a PHA only has one 100-unit building, the PHA would still be eligible for stop-loss because the PHA has no grouping alternative (the PHA can only have one project).

11. I am a PHA with more than 250 units. Can I enter all my units into one project and also not convert to asset management?

A PHA with 250 or more units must convert to asset management. Additionally, only if its units meet the guidelines established in PIH Notice 2006-10 can the PHA combine them into one project. For example, a 260-unit PHA has two senior buildings, each with 130 units. If those projects are adjacent, the PHA could reasonably group those buildings into one project. However, the PHA would still be required to convert to asset management, **meaning that they must implement asset-based** budgeting, accounting, management fees, etc. If those buildings were on opposite ends of town, the PHA would not be permitted to combine those units into one project but would have two separate AMP numbers.

PHAs that are required to convert to asset management and do not will be considered non-compliant and subject to possible sanctions above, beyond just the loss of the \$4 PUM asset management add-on.

12. I am a PHA with under 250 units. Will HUD enter the new AMP numbers for me?

No. PHAs must enter their own AMP numbers. If a PHA does not enter AMPs by the deadline, the system will "default" to the existing development numbering system. Field Offices should not be entering this information on behalf of a PHA or making the initial determination of the groupings. The Department has only the authority to approve/disapprove PHA requested project groupings.

13. I'm a PHA that has less than 250 units and am also a "decliner." If I want to apply for stop-loss, how must I group my projects?

If a PHA with less than 250 wants to "stop" its losses by converting to asset management, it must group its projects in accordance with PIH Notice 2006-10.

14. If I'm a PHA with less than 250 units and also will be a "decliner", must I convert to asset management? Must I apply for stop-loss?

PHAs that are decliners are not required to apply for stop-loss. Hence, a declining PHA with less than 250 units is not required to convert to asset management (but would also therefore not be eligible for stop-loss).

15. PIC is still showing buildings in use that have been demolished. How should I handle these demolished buildings?

For the past year, the Department has been working off a backlog of demolished buildings that were not properly coded in PIC (these particular buildings required special "script" to modify their status). By March 31, 2006, all such coding errors should have been corrected. In the future, it is very important for PHAs to enter PIC data related to demolition or disposition or newly developed properties as soon as the property's status changes to assure correct inspections and correct scores for the PHAS process.

However, if there is a building/unit displayed that should not be displayed in PIC, assign the building/unit an AMP number and also notify the PICHelp Desk of the error. Please provide the help desk with your name, telephone number, Housing Authority number,

name of the responsible Field Office, and a brief description of the issue via e-mail to PICHELP@HUD.GOV or by calling 800-366-6827 between 8 a.m. - 8 p.m. EST on any business day.

16. If my PHA and another have been approved for consolidation, how will we enter our AMP numbers?

Submit AMP numbers for all groupings as a new PHA, even if the consolidation has not yet been reflected in PIC.

17. What if I don't enter anything by the April 21 deadline? What will happen?

If a PHA does not submit AMP numbers for its assets, HUD will assign default value AMP numbers based on the current development number groupings.

18. What if a PHA submits some AMP numbers, but not all?

If the PHA does not enter AMP number for all of its buildings, HUD will delete the partial AMP numbers and assign default value AMP numbers based on the current development number groupings.

19. Can I make changes in my AMP numbers prior to April 21?

Yes. PHAs are encouraged to enter/work in the new AMP screen prior to April 21. Any work that they enter, provided they press the "save" button will be saved. A PHA does not need to complete all the assignments at one time. PHAs can then return to the screen the following day and make changes to what they previously entered.

20. What if I need to change my AMP data after April 21?

Once lock-down occurs on April 21, a PHA will not be able to change its AMP designations without Field Office (FO) approval. Where a PHA's assignments have been determined to be unreasonable by the FO, the PHA will receive notification and will then be provided 2 weeks to make the changes in PIC. (HUD will "unlock" the AMP screen for the PHA to make the corresponding changes.)

21. How can I run a report of all existing buildings in my agency?

You can run a report on your existing buildings within PIC under "reports." Click the "reports" tab, Click on "select/deselect all" button, Click on "generate reports," click "yes" and then click, "ok." Click on the Excel Icon to export the file in order to group your properties. Click on "open" to download the file and save the file for backup documentation.

22. Once I create an Excel spreadsheet of my buildings, is there a way to "upload" that into PIC?

Unfortunately, there is not a way for an individual PHA to "upload" the entries into PIC itself. However, we have allowed a "batch" process for PHAs with more than 250 buildings where HUD will upload the information for PHAs.

23. If I have a lot of buildings, is there a way that HUD can enter this information for me?

The "batch option" is a one-time option for larger PHAs with a large number of buildings. These PHAs will be able to submit their AMP numbers in an Excel spreadsheet to HUD by March 17. HUD, in turn, will load that batch information by April 10. The PHA can then make any further adjustments prior to the submission deadline date of April 21.

24. What if I want to use the batch process but I don't have everything worked out by March 17?

The deadline for submitting AMP numbers for the batch upload process is March 17. A PHA does not need to have finalized all assignments. It can batch whatever assignments it has completed.

25. Where do I send my "batch" information?

You can send your Batch information to this address:

PH_Opfund2006@hud.gov

26. How will I be notified if my groupings are reasonable?

After the deadline for entering AMP numbers passes on April 21, the FO will review your entries for reasonableness. If your groupings are determined reasonable, you will receive a letter and/or e-mail from HUD, which will include a computer listing of the AMP groupings.

27. If I'm notified that my groupings are not reasonable, what happens next?

If the FO determines that a grouping or groupings are "not reasonable" before the deadline, the PHA can make the corrections in PIC themselves. The PHA will have 2 weeks to make these corrections/modifications.