

Section 225 of the Appropriations Act exempts PHAs with 400 or fewer units from converting to asset management. This is an increase from the 250-unit threshold set forth in 24 CFR 990.260(b). This exemption from conversion to asset management is only effective for Calendar Year (CY) 2008. PHAs with 400 or fewer units that are Stop-Loss agencies are not exempt from these provisions; they must implement asset management in order to be eligible for Stop-Loss.

A PHA with 250 to 400 units that requests exemption from asset management must do so by Board resolution and must notify HUD of its election with its operating subsidy submission, due April 25, 2008. PHAs that elect to be exempt from asset management will lose the $4 per unit month asset management fee. By combining all units into one project, they may also experience a reduction in their Project Expense Level (PEL). The Department has prepared a chart that estimates the fiscal impact from these two events, which it has posted [here](#).

Section 226 of the Appropriations Act allows PHAs to transfer Capital Fund dollars to pay for central office costs of the Public Housing Program, provided the PHA does not exceed 20 percent of the Capital Fund Program grant on operations. PHAs that use Section 226 must maintain cost allocations, and not management fees, for overhead expenses.

Please review the full [Notice](#) for more detailed information on these two asset management provisions.

Proposed FDS Prototype under Asset Management and Reporting Briefs

As a result of the transition to asset management, and in particular the need to report project-level activity, the Department has been working to redesign the Financial Data Schedule (FDS). In conjunction with the release of PIH Notice 2007-9, the Department posted a proposed FDS under asset management in April 2007. That proposed FDS was intended to assist
PHAs in their planning efforts, recognizing that the prototype was still in the development stage.

After various stages of internal testing, the Department has made minor changes to the proposed FDS under asset management that was previously posted. In December 2007, the Department made available on its website the [revised FDS](#), a description of the changes from the April 2007 prototype, and six "reporting briefs" that discuss different reporting issues. These reporting briefs are the result of questions the Department received through the Asset Management Help Desk. Reporting brief topics include:

- The Treatment of Certain Capital Fund Proceeds in Operating Budgets;
- Capital Fund Program;
- Mixed Finance Reporting of Non-Component Units;
- Central Office Cost Center (COCC) and Sale of Restricted Assets;
- Financial Reporting for Capital Fund Financing Program (CFFP) and Revenues and Expenditures; and
- Program Transfer Reporting.

Please visit the [Project-Based Accounting](#) link of the Asset Management website for the latest information.

### SAGIS Re-opened on March 3 for Operating Subsidy Submissions

On Tuesday, January 15, 2008, the link to the SAGIS system was disabled by the Department in order to make various system modifications to address performance issues experienced by users. SAGIS is the new electronic subsidy award and information system, which is being implemented in CY 2008 for public housing operating subsidies. Under the direction of the Department's Office of the Chief Information Officer (OCIO), a ‘Tiger Team’ was assembled to address the performance issues. Improving SAGIS performance was a top priority for the Department.

The Department is pleased to report the SAGIS system link was restored and made available to users on Monday, March 3, 2008. PHAs will have from 7:00 a.m. EST on Monday [March 3, 2008](#) to 11:59 p.m. EST on Friday [April 25, 2008](#) to submit their applications for operating subsidy. As of March 23, 2008, SAGIS has received 1,177 AMP operating subsidy submissions.

To enhance performance, improvements were made to the data entry screens for the forms HUD-52723 and HUD-52722 (applications for operating subsidy). The SAGIS training documents and the “PHA Tips for Successful OpFUND Submission” document have been updated to reflect the changes. A new document, “WASS PHA Setup Steps,” was also created to outline the process of setting up new SAGIS users. The documents are located on the [SAGIS Training Page](#).

For more information about the SAGIS System Performance Notice, please [click here](#).

### HUD Obligates Second Funding Cycle for CY 2008 Operating Subsidy

The Department has obligated a second funding cycle for Operating Fund subsidies for an...
additional four months covering March through June of CY 2008. Funding is now available in eLOCCS.

Estimated proration for CY 2008 is 84%, in accordance with the $4.194 billion in operating subsidies for CY 2008 provided by the Consolidated Appropriations Act of 2008 (P.L. 110-161) and the Department’s budget model estimates. This amount is subject to change based on actual submission of PHA subsidy requests. A number of factors may influence a PHA’s final CY 2008 subsidy eligibility, including changes in unit inventory.

Obligation letters for the second funding cycle of CY 2008 Operating Fund subsidies were published in the last week of February 2008. A set of Frequently Asked Questions (FAQs) was developed to provide additional information on the first interim funding of 2008.

For additional information, including how PHA subsidy amounts were calculated for the first six months Initial Obligation Period, please click here.

HUD Seeks to Improve Quality of Audits with Proposed Rule on Independent Public Accountant Roster

HUD recently proposed a new rule to establish a roster of approved independent public accountants and public accounting firms (IPA Roster) that would be permitted to perform audits and related services required of certain HUD program participants. Uniform financial reporting standards regulations established in 24 CFR part 5, subpart H, require PHAs to submit annual financial information to HUD. Because HUD relies on the audited financial information to ensure the integrity of financial data submitted, HUD participants would be required to select an IPA that is listed on the IPA Roster to perform the audits or related services required by HUD. The IPA roster would ensure that audits submitted to HUD have been performed by licensed IPAs in accordance with professional standards. HUD program participants would not be permitted to engage the services of an IPA sole practitioner or member, partner, or full-time employee of an IPA that is not listed on the IPA Roster to perform audits or related services required by HUD. Inclusion in the IPA Roster does not represent a warranty of the specific or related services performed by a listed IPA nor does it imply an endorsement by HUD of a listed IPA. The IPA Roster rule will be implemented 12 months after the publication of the final rule to give qualified IPAs time to register with HUD.

Guidance on Appeals under 24 CFR part 990, Subpart G, for Calendar Year 2008

On January 16, 2008, HUD issued PIH Notice 2008-03 (HA), Guidance on Appeals under 24 CFR part 990, Subpart G, for Calendar Year 2008. The Notice provides PHAs with guidance on the appeals process for CY 2008, under the Final Operating Fund Program Rule. Per Section 990.245 of the Rule, there are five types of appeals, as outlined below:

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Streamlined appeals: require a PHA to demonstrate a blatant and objective flaw in application of a specific Operating Fund formula component, such as a calculation based on an incorrect geographic coefficient.

Appeal of formula income for economic hardship: allows a PHA to request increased formula income (in accordance with §990.195(c)) due to a severe local economic hardship, such as a major plant or factory closing, that impairs a PHA’s ability to maintain rental and other revenue.

Appeal for specific local conditions: requires a PHA to demonstrate, through the use of a verifiable independent assessor, that the model-generated Project Expense Levels (PELs) fail to reflect local conditions. This appeal must demonstrate a minimum ten percent variance between model PEL and the actual, local PEL.

Appeal for changing market conditions: allows a PHA to appeal to receive an operating subsidy for vacant units due to changing market conditions, provided the PHA demonstrates it has engaged in aggressive marketing and outreach to rent those units.

Appeal to substitute actual project cost data: allows a PHA that has fully converted to asset management for at least two years to change its PEL based on actual cost data. A cost assessment conducted by an independent assessor must also be submitted by the PHA. Each appeal has specific requirements. For example, an independent cost assessment, procured at the PHA’s expense, is required both for the appeal for specific local conditions and the appeal to substitute actual cost data. Formula income and changing market condition appeals should be sent to the local Field Office. All other appeals are to be sent directly to HUD Headquarters with a copy forwarded to the local Field Office. Except for PHAs with more than 5,000 public housing units, appeals must cover the PHA’s entire portfolio and be the result of events that affect the entire portfolio, not just specific projects within the portfolio.

Appeals must be submitted by April 30, 2008. The Department expects to issue final appeal decisions by August 1, 2008. A PHA’s subsidy will be adjusted by the appropriate amount retroactive to the beginning of the year if an appeal is granted.

For additional details about the requirements for each type of appeal, PHAs are encouraged to read the full Notice prior to submitting an appeal.

Abbreviated Requirements for Year 2 Stop Loss Applications

PHAs that submitted an application for Year 1 Stop-Loss but that did not receive an official denial letter from the Department by March 1, 2008, only need to submit an abbreviated application by the Year 2 Stop-Loss application deadline of April 15, 2008. An e-mail was sent to all affected PHAs on March 21, 2008 outlining the documents that need to be submitted.

PHAs will then be provided with 45 days from the date of HUD’s official denial letter to submit documentation for any failed criteria. No additional information will be required for criteria found acceptable in the Year 1 application. HUD will review submitted material to determine whether or not an on-site assessment is required.

PHAs that did not submit a Stop-Loss application for Year 1 should submit the full Stop-Loss Year 2 application.

For additional information about Stop-Loss, please visit the website.
Notice Details Plans for Upcoming Rulemaking Associated with Changes to PHAS

On March 27, 2008, HUD issued Notice PIH 2008-18, Information on Upcoming Rulemaking Associated with the Public Housing Assessment System (PHAS) as a Result of the Conversion to Asset Management. The purpose of the Notice is to provide an update on the status of the proposed changes to the PHAS and other related activities. In the development of the new PHAS, the Department will publish for comment two related documents, as noted below:

- **Proposed Rule Making Revisions to PHAS:** HUD will issue proposed rule making revisions to the PHAS in support of asset management, as well as other program updates. Included as appendices to the proposed rule will be four scoring notices (one for each indicator). In the past, HUD published the scoring notices separate from the PHAS rule. For convenience, the scoring notices will be included with the PHAS rule. The anticipated publication date for the proposed rule is Spring 2008.

- **Proposed Management Review Form for Public Housing:** A proposed management review form for public housing (HUD-Form 5834), similar to that of the HUD-Form 9834 (Management Review for Multifamily Projects), was published for public comment in the Federal Register (73 FR 7575) on February 8, 2008. This form does not include the scoring, which will be addressed in the proposed PHAS rule.

Of note, there will be no scores in the transition year, other than physical. A list of frequently asked questions regarding the development of, and transition to, the new PHAS, is also listed in the Notice. For additional information, the full text of PIH-2008-18 is available [here](#).

**Transition to New Development Numbers Coming April 5–16, 2008**

Between April 5th and April 16th, 2008, existing development numbers for PHAs will be transferred to the New Development Numbers (originally referred to as “AMP numbers”). During this time, the Department will temporarily remove the ability for users to make any changes to the building and unit inventory. Additionally, the Department will suspend processing of the HUD-50058 forms during the evening hours (8:00 p.m. to 7:00 a.m. EDT). The Department will automatically re-number buildings where there is a duplicate building number in the New Development Numbers.

The Department encourages PHAs, where possible, to delay submitting HUD-50058 information until the transition is complete, to alleviate load on the system and to avoid potential rejections from the system.

The initial 12-digit AMP numbering system was a temporary means of identifying AMPs without the need for larger reprogramming within the Public Housing Information Center (PIC) system. The New Development Numbers that will replace existing project numbers in PIC will mirror the configuration of AMP building groupings and AMP numbers, and will eventually require PHAs to maintain only one number for various PIC reporting.

When the realignment is complete, PHAs are strongly encouraged to familiarize themselves...
with any system-modified building numbers and to submit building and unit corrections and HUD-50058 forms using the modified numbers. A building and unit correction or HUD-50058 form submitted without the corrected building number will be rejected by the system as it will result in a mismatch with the information in the system.

A full schedule of the transition will be posted on the PIC web site on March 31, 2008.

PHA Spotlight: City of Ashland Housing Authority, Wisconsin

This month’s PHA Spotlight shares the experience of a small PHA transitioning to asset management – the City of Ashland Housing Authority (AHA) in Ashland, Wisconsin. The Spotlight spoke with Barbara Demming, AHA’s Executive Director.

AHA has two AMPs comprised of 167 units, a Section 8 program with 67 units, and a USDA Rural Development property made up of 11 units. The larger of the two AMPs, AMP 1, has 137 units and includes senior, disabled and family units. The smaller of the two AMPs, AMP 2, has 30 units and includes senior and disabled units. AMP 2 was previously a Rural Development property, but AHA pre-paid its USDA mortgage in 2005 using the Capital Fund Program (CFP). Because the complex had been standing alone under Rural Development and had its own financial accounts, assets, and physical inventory, AHA decided to include the complex as an AMP when it converted to asset management. AHA is exploring whether or not to change the AMP configurations.

First, let’s get the record straight. PHAs with fewer than 250 units are not required to convert to asset management. Why did you decide to convert?

We are a decliner agency under the new Operating Fund formula. In order to qualify for stop-loss, we had to demonstrate successful conversion to asset management. That was our original motivation.

That makes sense. But the Department does not require small PHAs to establish a separate Central Office Cost Center (COCC). The AHA decided to convert using the COCC model. Why?

First, we thought it might be simpler administratively to adopt a system of fees in lieu of cost allocations. Second, we were intrigued by the notion that fee income would be “defederalized.” That was a really appealing prospect to us. Third, we liked the idea of separate budgets and financial reporting for each project.

Can you tell me a little about the staffing organization for the AHA prior to conversion to asset management?

We had seven employees including myself. We had a public housing manager who was responsible for the leasing and recertification, but who did not have any responsibility for supervising maintenance employees or managing the budget. We had one maintenance supervisor and two maintenance technicians. I worked as a full-time executive director and we also had an office manager.

How has that staffing changed?

In terms of numbers, our staffing has not changed very much. One of the maintenance
employees left for medical reasons and we did not hire a replacement. Therefore, we have six employees including myself, but I am only part-time. As the executive director, I work 24 hours per week. Most of my time is spent reporting to the Board, reviewing the financial reports, and overseeing the housing managers. One manager and one maintenance technician is assigned to each AMP. Each manager is responsible for their AMP, including managing the budget and reviewing monthly financial statements. The manager for the smaller AMP is also responsible for administering the Section 8 program, and the time spent on Section 8 is charged to that program. I am assigned to the COCC along with an office manager who is primarily responsible for some bookkeeping and rent collection.

Who is responsible for bookkeeping and accounting?
Much of the bookkeeping is done by myself and the office manager in the COCC. We employ a fee accountant for the accounting functions. The bookkeeping fee from HUD ($7.50 PUM) covers our fee accountant costs.

The COCC, through the office manager, does rent collection, so we charge back for that work. We are also considering handling the annual unit inspections inside the COCC and we may charge back for that as well. I’m going to be the one doing the annual unit inspections. We are evaluating the workload of the maintenance staff and we may have more capacity. Otherwise, managers are handling day-to-day management of the AMPs and they are starting to like it. Direct management of the sites was not the case prior to the conversion and the total responsibility mindset was not there.

You mentioned that you might be doing the annual inspections. Why wouldn’t you have the on-site managers do the inspections? We talked about it and the decision was driven by who has the most time to conduct the inspections. We are still exploring options, but I don’t anticipate it taking more than a few hours per week since we don’t have a lot of units.

Did the residents notice anything different with the conversion to asset management?
No, except that AMP 2 had a new manager. However, that new manager was already employed by AHA and was doing a lot with the re-exams anyway. Another change was in the case of an emergency, residents are now calling the manager instead of the central office.

How do you handle procurement of goods and services?
One of the maintenance employees was a maintenance technician/procurement officer prior to conversion to asset management, and he has continued in that role. Procurement needs are discussed between him and the site managers. He is well-trained in this responsibility. Because he is a maintenance technician, he is already a direct expense and his time is charged to the project anyway. So essentially, we’ve got site-based purchasing because the maintenance technician does it as part of his duties and he is part of the site staff. Remember, we are a small agency, so most of our purchases fall under the small purchase threshold.

Are the maintenance technicians shared between the AMPs at all?
Yes. We kept good records of the maintenance technicians’ time the first year so we had a year’s
worth of records. This helped us to determine how to prorate the costs of each maintenance technician in a reasonable manner.

**Did you estimate the cost of the conversion to asset management?**

We didn’t. I don’t think it cost much. The conversion to asset management was more of a philosophical decision. Initially, the proposal took some time and I had to put in some extra hours. We did not hire any consultants or engage any outside help; it was all done internally. I did the proposal and initial Stop-Loss package as well as conceptualizing and preparing the project budget (with help from our fee accountant). I attended the HUD training as well. The model in the Stop-Loss Submission Kit that HUD published was really helpful.

**If a small PHA is not required to convert to asset management, why should they do it?**

I am totally sold on the idea of asset management, although it took me a while to get there. We are only six weeks from the end of the fiscal year and we can see that we are generating positive cash flow at our AMPs and that we are going to make money on the COCC. I cannot emphasize enough what a feeling of empowerment it gives us to know that HUD is not going to regulate our use of the COCC’s fee income! Next year, we are looking into additional ways to generate COCC revenue. Perhaps five years down the road, we may have $75K to $100K to invest in some other activity such as building a house and selling it to a first-time home buyer. I think HUD hit the nail on the head with the conversion to asset management. In this time of limited resources, it is a far better way to manage our housing authority.

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**Notice Provides Guidance on Disposition of Excess Equipment and Non-Dwelling Property Under Asset Management**

On March 25, 2008, HUD issued PIH Notice 2008-17, *Guidance on Disposition of Excess Equipment and Non-Dwelling Real Property under Asset Management*. The notice provides guidance to PHAs in the disposition of certain Public Housing Program assets to the COCC under asset management.

**Disposition of Equipment or Reassignment of Equipment to the COCC**

PHAs should comply with the provisions of 24 part CFR 85.32(e). Disposition of original or replacement equipment acquired under a grant or subgrant will be made as follows:

1. An equipment item with a current per-unit fair market value of less than $5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency. If this equipment is retained within the COCC, it must be considered as a non-program asset and appropriate supporting documentation must be kept.

2. An equipment item with a current per-unit fair market value in excess of $5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency’s share of the equipment. The PHA can either reimburse HUD, per 24 CFR part 85.32(e)(2), or the PHA may request an exemption from these requirements for good cause. The exception request package must be submitted by the PHA to the Director of the local Public Housing Field Office and the package must include board resolution authorizing the disposition or

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reassignment of the equipment, the fair market value of the equipment, and any other supporting documentation necessary. The Field Office Director will forward the exception request package to Headquarters for determination.

**Disposition of Non-Dwelling Property or Reassignment of Non-Dwelling Property to the COCC**

The PHA has the following two options with respect to disposition or reassignment of non-dwelling property:

**Option 1:** Under Section 18 of the United States Housing Act of 1937, the PHA may request HUD’s approval for a sale or transfer of the administrative building or vacant land to another entity. The requirements for such a disposition are included under 24 CFR part 970. The request for a disposition must be made to the HUD Special Applications Center.

**Option 2:** As long as the PHA provides good cause for the action and demonstrates that the property is no longer needed for the operation of public housing projects, the PHA may request approval from HUD to remove the Declaration of Trust from the property. The PHA, with good cause, can request an exception under 24 CFR part 85.6(c) from the requirement to reimburse the federal government for its equity in the project. The request should be sent to the local Public Housing Field Office Director who will then forward the package to Headquarters for a determination.

Additional details on disposition of excess equipment and non-dwelling property can be found in the Notice.

**Asset Management Help Desk—A Selection of This Month’s Questions**

Thanks to our readers for continuing to use the Asset Management Help Desk. The following are questions of general interest received recently:

**Question:** Our agency employs several IT personnel. Under what conditions can these employees be charged off as a project cost (as opposed to a management fee expense)?

**Answer:** If these IT employees are performing work directly related to the day-to-day operations of the AMPs – say, the repair of a project’s printer – then that work may be charged a direct expense to the project. In all cases, the charges must be reasonable and necessary. All work associated with the general management of IT systems would be considered a management fee expense.

**Question:** A PHA can charge 10% of a Capital Fund grant as a management fee. Let’s say that the grant award is not made for two months into the start of my fiscal year. Can I accrue 2/12ths of that fee for those two months?

**Answer:** A PHA cannot charge the Capital Fund (i.e., accrue) for any expenditure prior to the award of the grant. However, under asset management a PHA can pull down the entire Capital Fund management fee at the time of award.

**Question:** Can a PHA that has in-house legal staff charge an AMP under fee-for-service?

**Answer:** Yes. A PHA is permitted to charge a fee-for-service for direct project costs, e.g., the handling of evictions. The PHA must document the method for determining the rate charged, which must be reasonable and in the best interests of the project.

**Question:** My PHA has approximately 800 units (required to convert to asset management). The space for our Central Office Cost Center (C OCC) is located on the ground floor of a senior high-rise. Should the COCC pay for its reasonable share of utilities?

**Answer:** Yes. The COCC should pay for all its direct costs, including utilities, cleaning, etc.

**Question:** If, in the first year of project-based budgeting and accounting (the so-called “transition year”), the COCC...
generates revenues that exceed expenses, is that surplus deducted from or added to the six months of working capital that can be assigned to the COCC?  
Answer: The surplus earned in the first year is added to the six months of working capital.

Question: Is the Board Resolution form, HUD-52574, required to be submitted with the submission of operating subsidy?  
Answer: No. Previously, when the Congress funded PHAs based on their fiscal years, the Board Resolution was submitted along with the request for operating subsidy. Now that PHAs are funded on a calendar year basis, the PHAs are still required to submit to HUD the board resolution form, but it does not accompany the operating subsidy submission. A PHA now submits the board resolution to the local field office in keeping with the start of its fiscal year.

Question: A mixed-financed project, owned by a party unrelated to the PHA, is required by its investors to have an independent audit. Can a PHA add the cost of this audit to the audit add-on for operating subsidy?  
Answer: No. Under the Operating Fund Program, the audit add-on only pays for the A-133 audit, not the cost of any audits specifically required of any mixed-financed projects.

Question: My PHA has fewer than 250 units. Am I required to have a budget prepared for my one AMP prior to the start of the fiscal year?  
Answer: Yes. As with large PHAs, small PHAs are required to have operating budgets approved by their boards prior to the start of the fiscal year. The main difference is that, for small PHAs, they will generally have one budget – reflecting their consolidated AMP – whereas large PHAs will often have multiple AMPs.

Question: If a maintenance worker is "shared" between two projects, what is an acceptable method of prorating that worker’s time?  
Answer: PHAs should use any reasonable method. If the projects are of like-kind (say, family projects built in the same period using similar construction methods), the PHA could prorate by number of units. A PHA could also prorate based on actual time sheets reflecting some recent reporting period.

What’s New on the Website?

- **PIH Notice 2008-18: Information on Upcoming Rulemaking Associated with Public Housing Assessment System as a Result of the Conversion to Asset Management**
- **PIH Notice 2008-17: Guidance on Disposition of Excess Equipment and Non-Dwelling Real Property under Asset Management**
- **Financial Impact of Changes in PEL and Loss of Asset Management Fee for PHAs between 250 and 400 units**
- **Certification of Accuracy of Data in PIC Used to Calculate the Capital Fund Formula Allocation in FY 2008**
- **Explanation of Second Funding Cycle CY 2008 Obligation for March through June**
- **SAGIS System Performance Notice, 2-19-08 Announcement**
- **Abbreviated Submissions for Year 2 Stop-Loss**
- **2008 Interim Funding FAQs**
- **PIH 2008-03 (HA) - Guidance on Appeals under 24 CFR part 990, Subpart G, for Calendar Year 2008**
- **January 2008 Obligation Letters**
- **Explanation of Initial CY 2008 Obligation Public Housing Operating Fund**
- **Proposed FDS Prototype Under Asset Management and Reporting Briefs**

Resources and Useful Links

For more information, please visit the HUD-PIH Asset Management Website [here](#). Click on the following hyperlinks for detailed information about specific topics of interest:

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Give us your ideas

Do you have an article idea, question, or comment for the editor? The Office of Public and Indian Housing (PIH) is the editor of this monthly e-Newsletter. Please send all inquiries by email to AssetManagementNewsletter@hud.gov.

Contact the Editor

The Office of Public and Indian Housing (PIH) is the editor of this monthly e-Newsletter. If you have a general question or comment for the editor, please send an email to assetmanagement@hud.gov with the subject line "Question/Comment for Editor."