

To: Owners and Agents of Section 8 Housing
From: Idaho Housing and Finance Association Compliance Department
Date: April 1, 2008
Re: Program Tips and Suggestions

❖ **Disability Verification:**

- Just a reminder that when you are verifying disability for purposes of reasonable accommodation the requirements are different than when verifying disability for purposes of eligibility. The 4350.3 REV-1 Chg.2 Chapter 3 section 3-17, figures 3-5 and 3-6, and section 3-28 address the definitions of disability as well as acceptable verification methods. Please note that there are separate requirements for the verification for reasonable accommodation.

❖ **Fair Housing Training:**

- The members of the Idaho Fair Housing Forum will be hosting some FREE Fair Housing training. It will be in Nampa, ID on April 22, 2008. Please contact Brian Dale at Brian.Dale@hud.gov or call 208.334.1088 x3005 for additional information.

❖ **Amy Compton:**

- We have a new person in our department that we would like to introduce. Her name is Amy Compton and she is the Administrative Assistant for the Housing Compliance Department. Amy is responsible for the processing of the HAP vouchers and for the EH&S follow up during the REAC process among other things. Her contact number is 208-331-4733 or email her at amyc@ihfa.org

❖ **IHFA Website:**

- IHFA has made some improvements to the website. We have added an archive of the Tips and Suggestions letters as well as a forms library. Please go to www.ihfa.org and click on the Housing Compliance, Section 8 Contract Administration tab to look at what is available and let us know if you have any suggestions for other items you would like to see.

❖ **E-mail Data Base:**

- It is the goal of the IHFA Housing Compliance department to assist owners and management agents in obtaining the most current HUD regulatory information. We do this, in part, by these Tips and Suggestions e-mails that occur periodically. If you have any additional addresses you would like added to the mailing list, such as site managers or other corporate employees, please send me their name, site or company affiliation, and e-mail address and they will be added to the distribution list. My address is heatherw@ihfa.org

❖ **Third Party Verification:**

- Please remember that HUD's preferred method of verification is third party. If third party verification is not obtainable you may go to a review of documents. In order to do this the 4350.3 REV-1 Chg. 2 Chapter 5 section 5-19 E outlines how to document why third party verification was not possible. This includes a written note to the file, a copy of the date-stamped original request, documentation of follow up efforts, and a written note documenting that there has been no response from the third party. In addition to this, section 5-13 C states that the owner must give the verification two weeks before review of documents is considered.

❖ **Resident Selection Plan:**

- We have been seeing some trends in relation to the Resident Selection Plan implementation. 1) The landlord references are said to be checked, but they are missing from the file. This is the case even when the application clearly states previous landlords. 2) The files appear to have ineligible residents

housed. When the criteria for resident selection and the background checks are compared, residents are being housed even when they do not qualify. The files do not contain the appeal documentation to show that an appeal was made or that a denial was overturned. **Please also note:** There is no requirement that the Resident Selection Plan must go to all applicants. It just must be available in the office.

❖ **Rent increases and Owner's Certification:**

- In our July 13, 2007 issue of our Program Tips & Suggestions newsletter we noted that rent increase requests must be accompanied by a copy of the "Notice to Tenants" that provides tenants with a 30-day comment period related to the submission. HUD Handbook 4350.1, Appendix 2 also contains an "Owner's Certification as to Compliance with Tenant Comment Procedures in 24 CFR 245". Please be sure to provide a copy of this certification with all rent increase requests that require a 30-day tenant comment period. We have been lenient, when possible, with regard to the timing of the submission of these documents. However, failure to submit all required rent increase documentation could result in processing delays and late Housing Assistance Payments. If you have any questions regarding this process, please contact Jennifer Rogers at (208) 331-4764

❖ **Top 10 most common findings/observations of 2008 (so far):**

1. Missing signatures and signature dates on forms such as Applications, 9887, 9887A, inspections, initial notices, etc...
2. The date **and** time of removal from the wait list is not being noted.
3. The application is missing initials of the person that is hand noting the date and time received.
4. The resident has not signed the new version of the HUD model lease.
5. For elderly properties that are not 202/8, the file is missing the pet addendum and/or pet rules.
6. The Family Summary Sheet is being completed by the owner not the resident as required.
7. The verifications and applications are missing the **updated** and full Title 18 verbiage that is required.
8. The forms contain white out.
9. The student questions are not being asked at move in, annual, **and** interim.
10. The rejection letter is missing the new reasonable accommodation verbiage.
(Listed in no particular order)

❖ **Quadel training at the 2008 AHMA conference:**

- Since the AHMA conference, we have gotten quite a few questions requesting some clarification on issues that were discussed during the conference. Listed below is clarification on some of those issues:
 1. The statement of no child support must be notarized.
 2. The initial lease dates must be at least one year. For example: June 1, 2007-May 31, 2008. It is also acceptable to extend to the end of the month. For example: June 1, 2008-June 30, 2008. Either way is acceptable and it is a management decision on which way to complete the lease.
 3. It is a requirement to do annual unit inspections.
 4. All lease modifications must be HUD approved. For those sites that are designated for the elderly but not 202/8, IHFA has provided an approved lease addendum that must be used. No additional lease modification is permitted without HUD approval.
 5. The Violence Against Women Act was passed and is now required at PUBLIC HOUSING properties. We are Section 8, and while we anticipate this being a requirement in the future, it is not as of yet. Therefore, we will not audit your Resident Selection Plan for this content until HUD issues guidance to the Section 8 participants.

If you have any questions or concerns regarding any of these reminders, please feel free to contact your compliance auditor by phone or e-mail or call 208-331-4707.