



Community Realty Management

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Community Realty Management

Emergency Housing for Sandy Hurricane Victims

HUD Properties: HUD has published an Open Letter to Housing Providers relaxing the requirements of The Fair Housing Act and the Housing for Older Persons Act of 1995 to permit the rental of vacant units in properties designated as "55 and Older" properties to displaced families with children.

Under the new guidance, a private owner of housing for older persons may make units available to evacuees under the age of 55 and continue to qualify as Housing for Older Persons, as long as the vacant units are made available to evacuees without restriction on the basis of familial status.

Evacuees include any-

one who, at the time of Hurricane Sandy, lived in a county declared to be a disaster area and designated for individual assistance from FEMA.

Evacuees who are housed must provide a self-certification that they formerly resided in one of the affected localities.

Unlike the IRS Disaster Notice which places a deadline of November 30, 2013, for housing non-qualified displaced persons in a tax credit project, HUD has not placed any deadline. The owner of the property may impose time limits, but is not required to do so.

While children must be

accepted if evacuees are housed, owners may restrict families with children from benefits of the facility and may (but is not required to) treat families with children differently than senior households, including use of swimming pool, clubhouse, etc., as long as such action does not violate State or local law.

If a unit occupied by an evacuee is needed for an elderly applicant, the owner has the option of asking the evacuee to move or allowing them to remain in place.

Owners of housing for older persons may advertise that evacuees will be accepted, but must make clear that this includes families

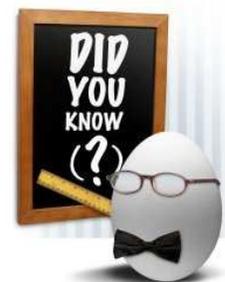
Continued on page 2

Did You Know???

- ♦ If there is a resident currently living in an accessible unit, but does not need the specific features of an accessible unit, the resident should review and

sign the document titled, *Accessible Unit Agreement*. Form is on the CD in the folder titled, "Fair Housing."

- ♦ If a resident is dis-



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How to Spot a Fake

- Make sure the person on the ID is the same person who handed it to you
- Does the address on the ID match the address they gave you on the application
- Does the address on the pay stubs match the address they gave you on the application
- Is the employer's name a little skeptical? Check them out through a Google search.
- If the credit report comes back blank or with all zeros, check with NTN to make sure the applicant didn't use a technique called "freezing" or "locking" to hide all of their credit history.
- Did the applicant use a "cheat sheet" to complete the application or were they on their cell phone checking with someone as to what they should write down?
- Once you receive the completed application, give the applicant a quick "pop quiz" about the information on the app. "Could you please confirm your Social and date of birth?"



Emergency Housing for Sandy Victims - continued from page 1

with children. Any advertising must make clear that the property is housing for older persons. The advertising of unit availability for evacuees is not required.

Evacuees may be required to meet the same qualifications in terms of screening as any other applicant.

HUD guidance appears to apply only to senior properties that are 55 and older; not those where all residents are 62 or older.

Non-discriminatory practices must be followed in renting rental of units to evacuees.

TAX CREDIT: Allocating agencies may permit some or all Own-

ers *within the Agency's jurisdiction* to provide temporary emergency housing after a major disaster to displaced low-income individuals that were living within the Agency's jurisdiction at the time of the major disaster.

When provided temporary housing, in order to avoid a reduction of qualified basis and subsequent loss of credits, owners must ensure that the following certification requirements are met:

- Temporary self-certification of income requirements.
- After four months, all documentation required to support the status as a qualified low-income individual must be ob-

tained.

- Individuals may self-certify regarding status as a displaced individual.
- Rents may not exceed the rents permitted.
- Existing tenants may not be displaced in order to provide housing to displaced persons.
- The non-transient use requirement will not apply to a unit providing temporary housing during the four-month emergency housing period.

Owners whose properties were damaged by Hurricane Sandy should immediately contact their allocating agency for permission to apply 2007-54.



Facts About EIV & TRACS

If there is no current active 50059 in TRACS, there will be no EIV data for the household. EIV income is compared to the certs in TRACS. TRACS needs to be reviewed on a regular basis, such as:

- Voucher Query: A few days after transmitting the voucher

- Certification Query: A few days after transmitting move-ins

A few days after transmitting interims and annual recertifications

If data is not showing up in TRACS, verify in OneSite that all submissions were transmitted successfully. Wait a few more

days and if the data is still not showing up in TRACS, contact your Contract Administrator.

TRACS has indicated that if we send files by 3:00PM, hopefully, they will be included in that night's processing. **Remember:** TRACS' requirement is 90% or above and EIV requirement is 100%.

Tacking EIV Income Discrepancies

Income discrepancies are received when there is an active certification in TRACS and it shows



income that is different from the income in the EIV database by \$2,400 (\$200 per month) or more, for the period of income (POI). Income Discrepancy Reports are required to be printed for every annual and interim recertification and need to be resolved within 30 days. 50059's and income verifications should be reviewed only for the period of income (POI) specified on the report.

What could cause the discrepancy?

- Human error due to calculations or missing a form of income on the 50059 – compare all verifications with the Recertification Update, re-calculate and review the 50059
- Income showing up on a 50059 that is not part of the EIV database such as pensions, child support, Welfare, recurring gifts, alimony, etc.
- TRACS missing a recertification or an interim
- Undisclosed income such as wages, Social Security, SSI and or Unemployment

After a thorough review, if the 50059 is determined to be correct, write an explanation on the Income Discrepancy Report, such as:

Resolved following a thorough review of documents. No problem found. Jane Doe, 12/1/12.

If a discrepancy is discovered, write an explanation on the Income Discrepancy Report, such as:

Resident failed to disclose employment wages. Income has been verified and resident has signed a Repayment Agreement. Jane Doe, 12/1/12.

Tax Credit Corner



THE FIX: Document your efforts to fix household file mistakes. Use a memo to file or a clarification form to show potential auditors what you did to try to remedy the mistakes that you uncovered during a typical review of resident files. Adapt the style below to your particular circumstances:

A review of the house-

hold's file on 11/25/12, revealed that annual household income recertifications and supporting documents for 2011 – 2012 were missing from the file. On 11/26/12, I mailed a written request to the household head to complete and return income recertification forms for the specific time period. I also requested pay stubs and certified copies of the household federal

tax return to support the data. The requested documents were received on 2/1/12; reviewed and fastened into the household tax credit file.

Notes or clarification forms are always signed and dated by the person preparing the form.

Above information was taken from the November, 2012 Tax Credit Housing Management Insider.

Resident Damages

From time to time, residents may cause damage to their apartments. The procedures to be followed will depend on the situation and the severity of the damage. The following will represent a typical good resident causing damages for the first or second time.

- Work order should be written
- Once work is completed, a follow-up telephone call should be made to find out if the resident was pleased with the maintenance work
- Letter should be sent to the resident indicating that damages were discovered in their apartment. Clarify what the damages are and the cost for making the repairs. Give resident 30 days to pay for the damages, as stated in the HUD Model Lease. The cost of damages is always limited

to actual and reasonable costs. Labor is never included.

- In some instances, a payment schedule may be necessary if the resident is not capable of paying the total damage amount within 30 days.
- If resident still has not paid within the required time frame, a second letter, Lease Violation or Notice to Cease, whichever is required in your state, should be forwarded to the resident. Always consult with your EPM on all legal matters.

In the event the resident has caused serious damages or repeated damages, the procedures may call for a stronger approach.

- Resident causes a minor fire due to excessive drink-



ing – Lease Violation and Notice to Quit should be given.

- Resident causes damages for the 5th time and hasn't paid for previous damages – Lease violation and Notice to Quit should be given.

The various circumstances of the damage and the situation will dictate the procedures to be followed. Common sense should prevail based on the circumstances.

Did You Know – continued from page 1

abled and has a companion animal, the cost of food, veterinary bills, leashes, collars, etc. are all considered medical expenses for the resident. Each expense needs to be verified in writing, just like medical expenses for the resident.

- ♦ HUD Headquarters will terminate assistance payments if a new recertification is not submitted within

15 months of the previous year's recertification's anniversary date.

- ♦ The resident file is required to have the initial recertification notice. A copy of the notice should be given to the resident at the time of move-in and every annual recertification.
- ♦ Our EIV Policy now requires residents to initial

Did You Know?

and date the EIV Income Report when it is reviewed with them at the time of the recertification interview.

- ♦ Download the app below and you will have the opportunity to speak into your phone and your phone will translate into Spanish, French, German, Italian, Japanese and others.

Ittranslate voice



Ask the Occupancy & Compliance Expert

“Questions & Answers with “Ms. Ophelia”

Dear Ms. Ophelia



Dear Ms. Ophelia,
I am a Property Manager from a HUD 202 Section 8 property. One of my seniors wants me to use his organic supplements and vitamins as a medical allowance. He also has an assisted animal and he wants us to include the vet bills as a medical allowance. Is he crazy or what? - Help Me Out From PA

Dear Help Me Out,
 According to the HUD Manual, we can accept receipts for nutritional supplements, vitamins and herbal supplements as long as they are recommended in writing by a medical practitioner licensed in the locality where practicing. These items must be recommended as treatment for a specific medical condition. As far as assisted animals, yes, we are permitted to include costs for the assisted animal's food, leashes and collars, veterinarian bills, etc. Make sure you obtain good receipts from your resident going back as far as 12 months for each annual recertification.

educational institution.

Dear Ms. Ophelia;
I am required to submit my applications to the Occupancy Department for approval. Several have come back stating I need more information on my waiting list. What could they possibly want? The page looks good to me and there is not much room to write anyway! - Frustrated

Dear Frustrated:

The Occupancy Department is trying to help you prepare for when you have your next management review!

Your waiting list needs to read like a story book. Do you have the income levels checked for each listing? Do you know who needs an accessible unit? If someone was rejected, why was he rejected and what was the date? If you are attempting to move the third person on the list but you don't say what is happening with the two above then you have some explaining to do. Try to look at your list from the eyes of an auditor. Why is someone being processed ahead of someone else?

Helpful Hints from Ms. Ophelia

Please remember your application is probably not the only application the Occupancy Department is reviewing right now. It would also be a good idea to send the application at least 24 hours or more in advance of your move in, especially if you are in a state where the housing authority also must approve all move ins. This will give the Occupancy Department time to review and you time to make any necessary corrections before the moving van arrives. A final note might be a statement on the fax cover sheet that you want to move this person in ASAP.

Ms. Ophelia enjoys receiving, reading and researching your questions and comments.

Please send your queries, concerns and comments to Norma Hines and she will forward them on to **Ms. Ophelia, our Occupancy and Compliance expert.**

You can email Norma at nhines@communityrealtymanagement.com

Or you can fax her @ 609-646-7919

Dear Ms. Ophelia,

I work at a 236 property. How do I determine a student's eligibility? -

Seeking an “A” in PA

Dear Seeking an “A” ,

The student must:

- be of legal contract age,
- must have established a household separate from parents or legal guardians for at least one year prior to application, or meet the U.S. Department of Education's definition of an independent student,
- Not be claimed as a dependent by parents or legal guardians; and
- Obtain a certification of the amount of financial assistance that will be provided by parents, signed by the individual providing the support. This certification is required even if no assistance will be provided.

The full amount of financial assistance paid directly to the student or to the educational institution and amounts of scholarships are excluded from annual income. His or her student status must be verified by the

Know When to Dispose of Old Resident Files



Resident files can take up a lot of valuable space. However, we all need to be careful of throwing files and documents away due to possible lawsuits or documents that HUD may need to look over during management reviews and or an

audit. The following will offer some excellent guidelines:

- Rejected applicants:
Keep files for at least 3 years
- Applicant withdrawals:
Keep files for at least 3 years
- Current residents:
Keep everything – never dispose of anything
- Former residents:
Keep files for at least 3 years

When disposing of any documents or files, be sure to do so in a manner that will prevent any unauthorized access to personal information. The HUD Manual 4350.3 indicates acceptable methods such as shredding, burning and or pulverizing. We could be sued or fined if any misuse of resident's personal information gets traced back to our negligence of disposal practices. Consult with your EPM prior to any major disposal of records.

Move Out Procedures

Following move-out procedures is very important for several reasons:

- The resident needs to know in advance what is expected at the time of the move-out inspection.
- The next applicant on the waiting list needs to be contacted and application procedures need to begin.
- The maintenance department needs to do a pre-move-out inspection so that they know in advance if major items need to be ordered for the apartment or if contractors need to be scheduled
- The resident should strongly be encouraged to

attend the move-out inspection.

- Good communication is a must regarding the resident who is moving out and the applicant who will be moving in.
- Once the move-out inspection takes place, make sure the resident signs the move-out inspection form so that there are no surprises when the resident receives their letter pertaining to their security deposit.
- Confirm the resident's new address
- Communicate again with the applicant who will be

moving in. Give them an idea of the move-in date and the monies that will be needed

- Prepare the move out package and send required paper work to the Financial Assistant at CRM so that the security deposit is processed within a 30 day period.



Shared Custody Issues

Consider this scenario; a leasing agent is processing an application from a divorced mother with an 8-year old child. The child will live with her mother 50% of the time. The other 50% of the time she will live with her father. As part of the application process an EIV Existing Tenant Search is run. The child's Existing Tenant Search shows that she is already living in assisted housing. What does the leasing agent do at this point? Can the leasing agent move someone into the property that will continue to live at another subsidized property

50% of the time? What about the unit size? Which family gets the dependent allowance?

This scenario is not too unusual. Yes, the child may live 50% with each parent even when both parents live in subsidized housing. The dependent is counted for the unit size and income limit purposes. The parents must decide which household will take the dependent allowance. Documentation is needed to prove custody.

Since it has been determined that a dependent whose custody is jointly shared by more

than one family is eligible to live in both properties, proper documentation is necessary to prevent the child from appearing on the Multiple Subsidy report. The leasing agent must use Item 43, Special Status on the 50059 to document the situation.

There are three codes that pertain to dependents whose custody is jointly shared by more than one family member. These codes are C, J, K, and may be used separately or combined.

Instructions for these codes are listed in the Instructions for Form HUD-50059, located on the HUD Website.

Helping our Seniors

There is an agency located in Audubon, NJ called Senior Citizen United Community Services. The services that this agency offers to our seniors include non-emergency transportation (SEN-HAN Transit), a nutrition project

(home deliveries) in-home services, respite care, personal care, adult family care caregiver education, homemaker assistance, emergency food bags, shut in shopping, recreational trips, financial services and the list goes on

and on.

For additional information

call 856- 456 – 1121 or visit www.scucs.org



- Don't forget if you see a "Y" for buy-in on an EIV Income Report, this means that the state is paying the

Medicare premium for the resident. The resident should not receive a medical expense for Medicare.

- Be prepared for the 2013 HUD Income Limits which

Don't' Forget...

are expected to be announced on 12/1/12. Limits will need to be updated in OneSite ASAP.

Word SEARCH Puzzle

Q	E	L	B	I	S	S	E	C	C	A	B	E	O	N	L
C	U	E	A	E	N	S	E	G	A	M	A	D	P	Z	G
B	E	R	N	G	P	K	T	N	P	K	P	O	R	U	E
A	L	I	Y	P	A	Y	M	E	N	T	P	C	Q	Y	N
M	X	D	I	F	P	Y	E	S	R	E	J	U	E	N	T
R	E	G	I	L	P	C	Y	A	B	D	O	M	S	T	U
O	H	L	E	N	L	H	S	R	O	I	N	E	S	N	Y
T	E	L	J	O	I	E	W	E	N	H	E	N	I	R	A
S	C	E	A	C	C	R	K	R	O	Y	W	T	U	S	E
C	A	H	M	V	A	U	N	T	I	R	S	N	N	E	N
T	C	N	A	O	T	N	X	A	T	Z	T	E	D	I	N
N	C	X	D	U	I	M	K	M	A	R	O	M	P	C	A
E	E	S	X	Y	O	B	Y	E	C	C	R	Y	K	N	C
D	S	E	R	D	N	Q	S	A	I	L	M	S	W	A	I
I	L	U	O	O	O	D	U	H	F	A	S	E	E	P	R
S	Q	K	P	T	R	A	C	K	I	N	G	N	D	E	U
E	U	J	W	S	S	A	R	I	R	E	S	I	I	R	H
R	E	H	C	U	O	V	E	L	A	G	T	O	S	C	S
A	R	M	E	C	Q	U	D	J	L	T	A	N	A	S	E
Z	Y	N	N	T	I	D	E	R	C	K	A	F	E	I	N
N	V	B	W	S	A	U	T	C	Y	I	M	Y	S	D	C

Hidden Words

Fake	_____
Credit	_____
NTN	_____
ID	_____
Application	_____
Voucher	_____
Query	_____
Accessible	_____
Unit	_____
Payment	_____
Damages	_____
Resident	_____
Document	_____
Clarification	_____
Tracking	_____
Discrepancies	_____
Files	_____
Custody	_____
Seniors	_____
Sandy	_____

The first employee to contact the Occupancy and Compliance Department with the finished puzzle will be recognized in our next newsletter.

Good Luck!



Last edition, Jessica Melendez, Lorraine Village, St. Croix and Debra Schlam, Administrative Assistant at CRM Home office were the first to contact the Occupancy and Compliance Department with the correct answers to our Word Search Puzzle!