

*** *Practical Points* ***

January 2010

From

PMCS-ICAP

& PAWA House Service Bureau

Services and Solutions for Properties of All Sizes

**Final Rule on Income Determination
Published in December 29, 2009 Federal Register**

Mandatory Compliance Effective January 31, 2010

The requirements have been released for the Refinement of Income and Rent Determination Requirements in Public and Assisted Housing Programs: Implementation of the Enterprise Income Verification System – Amendments; Final Rule. These requirements were published in the Federal Register on Tuesday, December 29, 2009 and become effective **January 31, 2010**.

What are the requirements?

- ◆ **EIV: Full implementation** of EIV is required on January 31, 2010 (not just use of the Income Report for recertifications). This means that ALL EIV reports must be used. HUD has mandated:
 - ** Using Income Reports and Income Discrepancy Reports for all recertifications (IRs, ARs and Initials for tenants changing subsidy type)
 - ** Pulling and acting upon the EIV Failed Pre-Screening Report and the Failed Verification Report monthly
 - ** Using the Existing Tenant Search at the final phase of applicant screening, before offering a unit. This must be in your Tenant Selection Plan.

- ◆ Social Security Numbers (SSN):
 - SSN documentation is required for subsidy for people of all ages, with very few exemptions. Exemptions include unassisted ineligible noncitizens and in-place residents (or those with already-determined eligibility) 62+ as of 1/31/10.
 - "SSN documentation" is either: (a) valid SSN card issued by the Social Security Administration, or (b) an original document issued by a Federal or State government agency that provides the SSN of the resident along with other identifying information.
 - A new household member under the age of six must provide SSN documentation within 90 days. A 90- day extension may be granted by management for certain extenuating circumstances.
 - Any household containing members without SSN documentation by the required timeframe must have its subsidy terminated (or, for PRACs, its tenancy terminated).

- ◆ Former provisions related to citizenship verification and changes in the definition of income have been eliminated.

What does this mean to you?

- Become VERY familiar with all the details of all the new provisions of the Final Rule as quickly as possible!
- Make sure your staff receives training (See our training schedule listed below or take HUD's training)
- And/or, read the Final Rule carefully so you know what changes you need to make. The Final Rule in the December 29, 2009 Federal Register can be found at: <http://edocket.access.gpo.gov/2009/pdf/E9-30720.pdf>

What's next from HUD?

On February 25, 2010, 11:00 - 1:00 EST, HUD will have a live webcast to provide Final Rule guidance and to answer questions from the 12/29/09 EIV training. You can submit your questions in advance (with "EIV Instructional Course" in the subject line) to: mf_eivcomments@hud.gov. Watch for a RHIIP Tips announcement with instructions about how to participate in the live webcast, or go to <http://portal.hud.gov/portal/page/portal/HUD/webcasts/schedule> to view the webcast schedule.

How can PMCS help you?

Register for one of our Telephone Training Seminars. They're an inexpensive way for you to train your staff - there are no travel costs, they usually last only 90 minutes, and we provide the materials via email!

Our knowledgeable trainers condense all the "HUD-speak" into understandable, practical information. Learn all the ins and outs of what's required and how to accomplish it. You'll be able to ask questions and have everything you need to be prepared for implementation!

Telephone Training Seminar dates and times:

Final Rule on Income Determination

January 21, 2010	3:00 PM - 4:30 PM EST
January 26, 2010	11:00 AM - 12:30 PM EST

Enterprise Income Verification (EIV)

January 19, 2010	3:00 PM - 4:30 PM EST
February 11, 2010	11:00 AM - 12:30 PM EST

Need custom training and consulting to tailor this information specifically to your company's needs? We can help - from answering a few questions by phone, all the way to providing phone or on-site training or consulting for your site, company or organization.

Please give Matt Simon a call at 1-800-245-7627 x1535 to discuss your needs.

Enterprise Income Verification (EIV) News and Resources

December 2009 EIV Instructional Course Webcast

On December 29, 2009, HUD held an Enterprise Income Verification (EIV) 8.1.2/9.0 Instructional Course webcast. This no-cost 5 hour training update outlines the new requirements and it has been posted to HUD's webcasts page at <http://portal.hud.gov/portal/page/portal/HUD/webcasts/archives/multifamily>. The webcast includes a PowerPoint slide presentation, which includes instructions on access, security and use of the system. Find the slides in PDF format as well as the Webcast at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivtraining.cfm>.

Before you print the slides, you should know that there are 333 slides - so you may not want to print one slide to a page!

HUD Notice H 09-20 Regarding EIV

On December 7, 2009, HUD issued Notice 09-20, providing updated instructions for O/As (Owners and Agents) using Enterprise Income Verification (EIV). The Notice explains when and how management companies and site staff should use the EIV system. It is 49 pages long, and contains written instructions as well as sample reports and a flow chart at the end. This is an excellent document to keep on site to help as you implement the new EIV requirements.

Download the notice through this link:

<http://www.hud.gov/offices/adm/hudclips/notices/hsg/files/09-20hsgn.doc>.

EIV Policies and Procedures

HUD requires that you have written EIV Policies and Procedures before using the system. This is one of the items your MOR reviewer is required to check. You can write them yourself, or, PMCS can help!

PMCS' EIV Policies and Procedures meet all HUD requirements, whether you choose our standard template or our customized version (which includes consulting to develop procedures just for you). As HUD requires, the procedures will list how you to use EIV, and how to meet technical, administrative and physical security requirements.

We'll make EIV compliance easy for you! Just call Matt Simon at 1-800-245-7627 x1535 or email solutions@pmcs-icap.com.

Extra Help from the Social Security Administration

A recent news release from the Social Security Administration (SSA) shows how residents can apply for *extra help* with Medicare prescription drug costs. These tough economic times aren't easy on those who have to pay for their Medicare prescription costs. The goal for the SSA is to provide some relief to those in need.

To qualify for *extra help*, applicants must meet the required resource and income limits. Previously, the cash value of life insurance was counted as a resource. This new law eliminates this. Also, the assistance people receive from family or friends to help pay for household expenses, like food, rent, mortgage and utilities, will no longer be counted as income for Medicare prescription qualification purposes. The online application for *extra help* can be found at www.socialsecurity.gov/

You can make your tenants aware of these new changes. The news release can be viewed here: <http://www.socialsecurity.gov/pressoffice/pr/chubby-checker-pr.htm>.

Featured Service: Tenant File Reviews

FINDING IT TOUGH TO KEEP YOUR TENANT FILES IN COMPLIANCE?

IT DOESN'T HAVE TO BE A STRESSFUL TASK – PREPARE, MAXIMIZE, CUSTOMIZE AND SAVE WITH PMCS

We understand the importance of receiving a positive rating on your Management and Occupancy Review (MOR). Passing the tenant file portion starts with organization and compliance – two of our specialties! Let us review, organize and help update your tenant files.

PMCS services are performed by our AHM/COS certified staff, which includes leading industry trainers, all of whom have thorough knowledge of HUD, TRACS, and occupancy issues, the 4350.3 Handbook and Contract Administration. Please call us to discuss your needs, and receive a customized proposal.

Check us out on the web at www.pmcs-icap.com, give us a call at 1-800-245-7627, or email Solutions@pmcs-icap.com for a **customized** quote.

2009 Telephone Training Seminar Drawing Results

Throughout 2009, for our 20th Anniversary, we offered discounts and specials and topped the year off by entering all seminar attendees into several drawings to win CASH! I'm sure all of you have been anxious to hear the results.

Drum roll please...

6-Pack Seminar Grand Prize Winner: \$100 VISA Gift Card

Evelyn Budde of Mercy Manor

Regular Seminar Winners: \$25 VISA Gift Card

Roxane Jones of the Village of Potsdam Housing Authority

Lisa Gentry of Creekview Manor Apartments

Ranndie Robinson of Friendship Place

Rose Nittolo of Cacciola Place

Congratulations to all of our winners and thank you to everyone who attended our 2009 Telephone Training Seminars. We hope to "see" all of you again in 2010!

Upcoming Trainings

Some of Our Upcoming 2010 Telephone Training Seminars

Final Rule on Income Determination

We've all been waiting anxiously to see the effects of the proposed amendments!

Know what to expect before the January 31, 2010 implementation date!

Thursday, January 21, 3-4:30 PM EST

Tuesday, January 26, 11-12:30 PM EST

Enterprise Income Verification (EIV)

Are you ready for EIV implementation, required January 31, 2010?

We'll go over all of the reports, income verification, applicant checking, and more!

Tuesday, January 19, 3-4:30 PM EST

Thursday, February 11, 11-12:30 PM EST

***NEW* Better Tenant Interviews**

What is HUD's new C.A.V.E. system for interviews?

You'll learn to implement C.A.V.E. for applicant and tenant interviews.

Thursday, February 4, 11-12:30 PM EST

Management and Occupancy Reviews (MORs)

Did you know about the changes made to MORs?

Find out what you can expect during your next MOR!

Tuesday, February 9, 3-4:30 PM EST

Save Money - Save Time - Go Green with our Audio Classes

Where you can find us:

PennDel AHMA **Final Rule/EIV**

Wednesday, January 27, 2010
9:30 AM - 3:30 PM EST

JAHMA **Final Rule/EIV**

Thursday, January 28, 2010
9:30 AM - 3:30 PM EST

Tell us what you'd like to see!

We'd like your ideas for new class topics or old topics you'd like to see again! Have you looked for training on a topic... and didn't find it? Have you taken training with others that was on the wrong level - not basic enough, or not advanced enough? Send your suggestions to Matt Simon at solutions@pmcs-icap.com or call 1-800-245-7627 x1535. Our January - May 2010 Telephone Training Seminar class list is NOW AVAILABLE, but we plan to add to the offerings as needed! Keep checking www.pmcs-icap.com.

Private Classes for Associations, Managing Agents and Contract Administrators

We provide high-quality training for your members and staff. Any of our live and/or telephone classes may be customized to meet your specific needs. If you have a Conference or Educational Series coming up within the next year, consider bringing us in to conduct a full-day, half-day or 1-2 hour workshop session.

Questions about trainings?

Contact: Michelle Cimino at 800-245-7627 x1520 to request a schedule and registration form for Telephone Training Seminars or email solutions@pmcs-icap.com.

At the End of the Day...

"To shorten winter, borrow some money due in spring."
~W.J. Vogel

For Further Information, Please Contact Us:

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Happy New Year