

# \*\*\* *Practical Points* \*\*\*

July 2010

From

## PMCS-ICAP

& PAWA House Service Bureau

Services and Solutions for Properties of All Sizes

### EIV Update: New Notice & Requirements

On July 6, HUD released Housing Notice H10-10, Enterprise Income Verification (EIV) System, which replaces Notice H09-20. The 77-page Notice contains some changes in EIV requirements, as well as many suggestions and clarifications.

You will need to update your EIV Policies & Procedures, so be sure to read the entire Notice carefully. Key changes in requirements since our recent EIV trainings include:

- ✓ Sites must keep a “Master File” for each report (rather than a file/binder by month) for the Failed EIV Pre-Screening, Failed Verification, New Hires, Multiple Subsidy and Deceased Tenants Reports, since they are not kept in the tenant files.
- ✓ Sites must print out the Income Summary Report showing Identity Verification Status of “Verified” for each household member. This is a one-time printout unless there are changes in household composition.
- ✓ For all Move-Ins, sites must print and review the Income Report within 90 days, resolve any discrepancies and do a Correction if needed. We suggest printing the identity verification at this time too.
- ✓ Failed EIV Pre-Screening and Failed Verification Reports must be printed for “All” tenants monthly, and Correction/IR certs completed promptly as needed.
- ✓ When discrepancies are investigated, and third-party verifications have been obtained, sites must request that the tenant come in within 10 days of notification to discuss the results.
- ✓ Effective July 1, 2010, new Repayment Agreements must contain several required items (see the notice for details), including a renegotiation clause when tenant income goes up or down \$200/month or more, total amount owed, lump sum paid at the time of the Agreement and monthly amounts, and specific statements regarding tenant obligations and consequences for failure to meet them.
- ✓ Sites must review and resolve Income Discrepancy Reports at the time of the recert, or within 30 days of the Income Report date (“resolve” includes doing any retroactive 50059s needed.) Sites are not expected to reconcile dollar amounts to the penny.

Other important items:

- ✓ Appendix 6 is an excellent chart showing each report, how to use it, what documentation to keep on file, and how long (and where) to keep it.
- ✓ When there is a change in ownership or property management, the new Owner/Agent has 90 days to get access and begin using EIV, or penalties will result.

Get a copy of the notice (in .doc format), which includes helpful examples and charts, at:

[http://portal.hud.gov/portal/page/portal/HUD/program\\_offices/administration/hudclips/notices/hsg](http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg)

## 2010 Census Dos and Don'ts

All across the country, census takers are interviewing citizens to count the population and to collect information for the 2010 Census. These census takers have been conducting interviews since March 2010, and will continue to collect information throughout the next 6 months. The purpose of the census is pretty simple - a countrywide population count is required *by law* to take place every ten years.

### What do *you* need to know?

The census takers are responsible for contacting the tenants directly; however, you must provide the names of specific tenants, if asked, as well as provide your name and phone number. In the instance that a census taker cannot reach a tenant, or if a unit is vacant, you will be asked to answer a few occupancy questions about the unit. As there are no Privacy Act repercussions, you may also provide the dates that a particular unit was vacant. Any additional questions from the census taker must be handled by HUD.

Additionally, CA's are NOT to provide any information to census takers; simply forward them to the owner/manager of the property.

**Please note:** If a tenant has taken a temporary job as a census taker, the income they earn from *that position* is to be excluded from HUD calculations.

## Are You Current with Civil Rights and Fair Housing Requirements?

HUD recently revised Chapter 9 of the 4350.1 Multifamily Asset Management and Project Servicing Handbook. This chapter, titled Program Monitoring of Civil Rights Requirements, deals with fair housing and nondiscrimination.

A few months back, we had mentioned HUD was asking for feedback on their 2010 – 2015 Strategic Plan. Part of their Strategic Plan is to create “Equal Opportunity in Housing.” Chapter 9 outlines how you can help make it easier for HUD to detect civil rights violations and UNequal opportunities.

### What are some of the changes?

- Information on non-discrimination against disabled employees
- An outline of Civil Rights and Equal Opportunity Laws
- An Affirmative Fair Housing Marketing Plan guide for HUD Project Managers

The updated chapter, as well as the rest of the handbook, and the May 27th transmittal notice can be found here: <http://www.hud.gov/offices/adm/hudclips/handbooks/hsg/4350.1/>

## REVISED Affirmative Fair Housing Marketing Plan (AFHMP) Form

The new, official form HUD-935.2A, Affirmative Fair Housing Marketing Plan (AFHMP), was revised in May 2010. You are now able to type directly into the new form! **Please note:** all AFHMP's submitted on or after July 1, 2010 should be on this new form.

The following link will take you directly to the form:

<http://www.hud.gov/offices/adm/hudclips/forms/files/935-2a.pdf>

### TIPS

**Question:** Approximately 1-2 years ago my staff and I took the EIV training (webinar) that HUD offered. Is this considered “formal training”? What are HUD’s requirements? **Jodie, NY**

**Answer:** HUD requires that each EIV Coordinator and User have an initial training before using EIV, and an update training at least annually. These training requirements can be satisfied by taking EIV classes (such as the audio and live classes that PMCS and other firms do), or by watching the official HUD EIV webcasts.

The HUD Policy staff has made the commitment to offer webcasts at least annually to help EIV users meet the requirement. Staff can watch them at their convenience on their computers at no charge, and can download the training materials that go with them. You can find all past EIV webcasts at:

<http://www.hud.gov/webcasts/archives/index.cfm>.

Currently, HUD does not offer a Certificate of Completion, although this has been suggested. During a recent webcast, the Policy panel stated that acceptable documentation is a notation of the name, date and time that the webcast was viewed, along with noting which webcast it was (i.e. the title and date). We recommend that you attach that documentation to a printout of the training materials.

**Have a question that you’d like answered in this column?** Email us at [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com) with Practical Points Question on the subject line, or fax to 315-451-2456.

### QUIPS

“Humor is mankind's greatest blessing.”  
-- Mark Twain

## Welcome to Our New Employees!

Two new employees have been added to the PMCS Team. They are Karen Wherry, of Tampa, FL and Ricci Rathburn of West Monroe, NY (north of Syracuse). We are very excited to welcome these two aboard! Here’s some background information about Karen and Ricci:

Karen comes to us from Presidio Realty where she was the Compliance Supervisor. Prior to working for Presidio, she worked for CGI/North Tampa Housing Development Corp (the CA for Florida) performing Management and Occupancy Reviews (MORs). Karen comes to us with significant Affordable Housing experience. Her extensive background in this industry will make it easy for her to adapt here at PMCS. She will be based in our Zephyrhills, Florida office.

Ricci started with us in May, and has quickly become an established member of the PMCS family. She came to us from Purity Water Company, where she held the position of National Account Manager. Her years of customer relationship experience and ability to learn on the go have helped her grow quickly as our Solutions Consultant. She will be splitting her time between our New York and Florida offices, working in Syracuse for 5 months and Zephyrhills for 7 months of the year.

**Please join us in welcoming Karen and Ricci to our team!**

## 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.

Please contact PMCS at [solutions@pmcs-icap.com](mailto:solutions@pmcs-icap.com), 800-245-7627, or visit <http://www.pmcs-icap.com/pmcs-icap-tenant-reviews.html>. We'll be happy to discuss your specific needs, and provide a customized proposal.

Our goal is to keep you compliant by providing high quality services at affordable prices! Check out our services on the web at [www.pmcs-icap.com](http://www.pmcs-icap.com). We can now accept your credit card payments via PayPal, so using our services is easier than ever before!

## Upcoming Trainings

**NEW CLASS HAVE BEEN ADDED – OUR SCHEDULE RUNS THROUGH NOVEMBER 2010**

### Highlights from Our Upcoming Summer/Fall 2010 Telephone Seminars

**\*Class Schedule and Registration Form Attached\***

#### Final Rule/TRACS ROB Update

Learn about changes in SSN and EIV requirements in the 4/14/2010 HUD Notice 10-08. You'll also find out how to comply with the new Rules of Behavior (ROB) and TRACS Security Exam.

Friday, July 30, 3:00 PM - 4:30 PM EST  
Thursday, August 19, 3:00 PM - 4:30 PM EST

#### Successfully Using EIV

You know the basics – now, how do you use EIV effectively and efficiently? We're including case studies, *your* questions & situations, and practical uses of EIV reports!

Tuesday, August 17, 3:00 PM - 4:30 PM EST  
Wednesday, September 8, 11:00 AM - 12:30 PM EST  
Tuesday, October 12, 3:00 PM - 4:30 PM EST  
Tuesday, November 9, 11:00 AM - 12:30 PM EST

**Save Money – Save Time – Go **Green** with our Audio Seminars**

**Where you can find us:**

## **Conferences:**

### **Real Page Conference**

Sunday, July 25 – Tuesday, July 27  
Las Vegas, NV

### **NJ Governor's Conference**

Tuesday, September 28 – Wednesday, September 29  
Atlantic City, NJ

### **PennDel AHMA Fall Management Conference & Expo**

Wednesday, October 13 – Thursday, October 14  
Lancaster, PA

### **NEAHMA Conference & Trade Show**

Thursday, October 28  
Norwood, MA

## **Tell us what you'd like to see!**

We welcome 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 trainings with others that were on the wrong level - not basic enough, or not advanced enough? Send your suggestions to Matt Simon at [solutions@pmcs-icap.com](mailto:solutions@pmcs-icap.com) or call 1-800-245-7627 x1535. Our Summer/Fall 2010 Telephone Seminar schedule is available online at [www.pmcs-icap.com/pmcs-icap-events.html](http://www.pmcs-icap.com/pmcs-icap-events.html).

## **Private Classes for Associations, Management Companies and Contract Administrators**

We provide high-quality training for your members and staff. Any of our live or telephone classes can 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 phone trainings?**

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

## **For Further Information, Please Contact Us:**

**Telephone:** 1-800-245-PMCS (7627)

**Fax:** 315-451-2456

**Web:** [www.pmcs-icap.com](http://www.pmcs-icap.com)

**E-mail:** [Solutions@pmcs-icap.com](mailto:Solutions@pmcs-icap.com)

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**Solutions You Can Count On**