*** *Practical Points* ***

September 2010

From

PMCS-ICAP

& PAWA House Service Bureau

Services and Solutions for Properties of All Sizes

Attention Independent Secure Systems Coordinators and Users!

WASS IDs beginning with the letter "I" cannot access TRACS Queries

Because of tightened security related to tenant data in HUD's databases, I-IDs (for Independent Coordinators/Users) can no longer access queries and reports from the TRACS system in HUD's Secure Systems (WASS).

In order to continue to use the TRACS system, users with I-IDs will need to apply for a new M-ID. HUD posted this announcement on August 30, 2010. <u>If your current ID starts with the letter M, you can continue to access the TRACS system, and the following steps do not apply to you.</u>

What steps do you have to take to obtain an M-ID?

- Ask your Secure Systems Coordinator to remove all roles that have been assigned to you. This will automatically deactivate your I-ID.

- Next, complete the online registration form found at:
https://hudapps.hud.gov/public/wass/public/participant/partreg_page.jsp

- Once you have completed, reviewed, and submitted the registration form electronically, allow HUD 24 hours to respond to your request.

- For additional assistance, email Reac_tac@hud.gov.

- After you receive your M-ID, make sure your Coordinator assigns you to all the Roles and Sites you need.

Unable to Locate the Rules of Behavior in TRACS or iMAX? You're Not Alone

In recent weeks, we've found that TRACS and iMAX users who have not accepted their electronic TRACS Rules of Behavior (ROB) since it became available, are not seeing it. After logging into HUD's Secure Systems, then clicking on either TRACS or iMAX, users were prompted to accept the new TRACS ROB before proceeding. For some of those who have waited until now to accept the TRACS ROB, this is not the case.

After speaking with some industry colleagues and the MF TRACS HelpDesk, here are some suggested solutions until the issue is resolved:

1. Sign & date the paper copy of the TRACS Rules of Behavior. Save it in a safe location – preferably with other permanent documents. You can print this document here:
http://www.hud.gov/offices/hsg/mfh/trx/pdf/mftracsrob.pdf.

2. Make sure you have taken the TRACS Security Awareness Training Questionnaire (SATQ). This "course" is located at http://iase.disa.mil/eta/index.html#onlinetraining. Click on the **Federal ISS Awareness** icon. Once you've completed the *entire* course, print the certificate of completion, sign it, and keep it on file.

3. According to MF TRACS Security, your TRACS access will be maintained as long as you've passed the security test.

If you have any questions, please contact the MF TRACS HelpDesk at MFTRACSSECURITY@hud.gov.

<p style="text-align:center;color:red;">**Important!**</p>

HUD has extended the deadline for WASS users to accept the TRACS ROB to **October 1, 2010**. Originally, users were required to have accepted it by September 3, 2010 in order to continue transmitting TRACS files.

On August 24, 2010, HUD revised the iMAX Industry Specs to delay the requirement and new error message until the October 1st release of the new iMAX version. The 60-page iMAX Specs document is located here: http://www.hud.gov/offices/hsg/mfh/trx/pdf/imaxindustryspec.pdf. Changes for the October 1, 2010 release are highlighted.

EIV Security Test Update

Many of you have recently been prompted to complete your annual EIV Security Exam. This is the 10 or 15 question quiz, depending on whether you are an EIV User or Coordinator, which you are required complete once a year.

Currently, when EIV Users and Coordinators pass the test they get an immediate screen message saying they passed; however, the new test is not available for printing or viewing. **This does not apply to NEW EIV Users or Coordinators taking the exam for the first time.** Typically, you should be able to view your *current* test results by clicking on the "Security Exam Report" on the lower left side of your computer screen when you are logged in to EIV. Users are only seeing the results of their previous exam.

What's being done?

The EIV Programming Team is aware of this problem and is working to correct it. If you have any questions, email Mf_Eiv@hud.gov.

Changes to the Deferment Process of
Partial Year Financial Statement Submissions

As of June 25, 2010, some changes have been implemented regarding partial year ("stub") submissions of financial statements. According to HUD Notice H10-09, the Real Estate Assessment Center (REAC) has the authority to approve or deny your request for deferment for a period lasting no longer than 120 days. Beyond the initial 120 day request period, the Office of Asset Management retains authority. Previously, the deferment request period gave REAC authority for only 90 days before turning it over to the Office of Asset Management.

Why would someone need to submit a partial year financial statement?

Wondering why someone would need to submit a stub? A partial year financial statement might need to be submitted when a property is sold. If a property is sold on September 30, 2010, the original owner would have to provide HUD with an audit submission for January 1, 2010 – September 29, 2010. The new owner would be required to submit a financial audit for September 30, 2010 – December 31, 2010. The new owner might want

to add those months to the upcoming 2011 year-end financial statement submission so s/he doesn't have to provide two separate audits.

Submission Process

Deferment requests must be submitted electronically via HUD's Financial Assessment Subsystem (FASSUB) under HUD's Secure Systems. If you do not currently see FASSUB listed as a link when you sign into Secure Systems, you will need to have your Coordinator assign this role to your M-ID. Your next step is to select "Waiver" option after connecting to FASSUB. The approval process takes up to 10 business days. You can check your request's status by clicking on "Administrative Request Status Box" on the FASSUB main page.

For additional information, you may contact your local HUD office or Brandt White, of the Office of Asset Management, at (202) 402-2614. HUD Notice H10-09 can be viewed here: http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/hudclips/notices/hsg/files/10-09hsgn.pdf.

Tips, Clips & Quips

TIPS

Question: When I get wrong information from Social Security through EIV on the resident; what steps do we need to take to correct the information in EIV or is the resident responsible for that area? **Brian, GA**

Answer: It depends on the type of "wrong information" in EIV.

If there's a problem with one of the identifiers (name, SSN or birth date), you should give the tenant the SS-5 Form http://www.hud.gov/offices/hsg/mfh/rhiip/instructionalpacketforoas.pdf. This is the Application to apply for an SS card - but it's also the correct form to complete to correct invalid information in the SS system. HUD encourages management to assist the tenant as needed, and to keep a copy in the tenant file to document attempts to correct Failed EIV Pre-Screening/Failed Verification Reports.

If it's incorrect income information (i.e. the tenant disputed EIV and you're using the Award Letter instead), the tenant should contact the local SS Office to request that the invalid information be fixed. This may be a timing issue and may correct itself during the next quarter. There's nothing site managers are required to do (or can do) to correct erroneous income data in EIV.

Question: At a recent AHMA seminar, we were advised by our local HUD office that the copy of the Social Security card in the tenant file should be destroyed. At the same time, HUD also advised that the name to enter in computer systems for recertification processing should be the name that appears on the Social Security card. However, when asked "how do we prove we used the right name if we follow HUD's guidance to destroy the copy of the card?" HUD changed its guidance to: "Keep the copy." Please help clarify! **Carmen, CA**

Answer: The key word here is "should". As Michael Sharkey (HQ Policy) and I discussed, the Final Rule uses the "should"-word, not the "must"-word. I explained that we trainers out there interpret "should" a bit differently… some trainers feel that "should" means, "You better, unless you can document a good reason not to." We (PMCS), on the other hand, interpret it as "We'd like you to, but it's your choice". Michael agreed with our interpretation.

The spirit of the law, in this case, is that HUD wants to minimize the occurrences of the full SSN in the tenant file to avoid identity theft. However, the reality is that the full SSN appears in the tenant file in many, many places, on documents we cannot remove or destroy.

So, bottom line, sites can keep or destroy the copy of the SS card, whichever makes them more comfortable. My advice would be to keep it – and your story is the perfect example as to why!

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

CLIPS

Choice Neighborhoods Public Webcast.
The topic of this webcast is HUD's Choice Neighborhoods program. Our June Practical Points included an article on this program titled "Apply for Grant Funds to Transform Your Community". The June 2010 Practical Points can be viewed here:
http://www.pmcs-icap.com/pdf/Practical%20Points%20-%20June%202010.pdf.

You can view the HUD webcast here: http://portal.hud.gov/portal/page/portal/HUD/press/multimedia/videos.

You can also find the 65-pages of PowerPoint slides that accompanied the training in PDF format at:
http://www.hud.gov/utilities/intercept.cfm?/offices/pih/programs/ph/cn/docs/cn-broadcast.pdf.

QUIPS

"Formula for success: rise early, work hard, strike oil."
        -- J. Paul Getty

Featured Service: Everything EIV!

Do you need assistance with EIV?

We had such a great response to our EIV services this past month that we decided to keep running EIV as our featured service! Not sure where to start, or just need some help? We offer a variety of EIV services including:

Running EIV Reports ● Registering new staff members ● Adding EIV requirements to the TSP
Assigning new properties to your M-ID ● Consulting on both access and reports follow-up
EIV Policies and Procedures – standard or custom

Training, our most customizable service, can be provided through a variety of methods. We'll train you and your staff one-on-one, by telephone, via GoToMeeting, on-site, or at your company manager's meeting. Most importantly, we'll customize the session to meet your needs and knowledge level.

Please contact PMCS at solutions@pmcs-icap.com, 800-245-7627, or visit http://www.pmcs-icap.com/pmcs-icap-eiv.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. We can now accept your credit card payments via PayPal, so using our services is easier than ever before!

DUE TO SUCH AN INCREDIBLE RESPONSE
TO OUR FIRST SEMINAR, WE'VE ADDED A SECOND!

EIV – Beyond the Basics

Wednesday, September 22
9:00 AM – 3:30 PM EST
Syracuse, New York

HUD's EIV NOTICE H-2010-10 BECAME EFFECTIVE ON JULY 1ST -
FIND OUT HOW THIS CHANGE AFFECTS YOUR PROPERTY!

ONLY $199.00!
Register now before it's too late!

For more information, please contact Matt Simon at
solutions@pmcs-icap.com or call 1-800-245-7627 x1535.

Upcoming Trainings & Conferences

Ongoing Telephone Seminars

Please be sure to check out our Fall 2010 Phone Seminar Schedule!
It has been attached to this newsletter

Save Money – Save Time – Go Green
with PMCS Telephone Seminars

Public Seminars

EIV – Beyond the Basics
Wednesday, September 22
Syracuse, NY

JAHMA
Successfully Using EIV
Thursday, October 7
Edison, NJ
http://www.jahma.org/10-7-2010-EIV-info.html

Conferences, Meetings & Trade Shows

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

NAHMA Fall Meeting - Regulatory Issues Forum
Sunday**,** October 24 – Tuesday, October 26, 2010
Washington, DC

TRACS Industry Meeting
Wednesday, October 27 – Thursday, October 28
Washington DC

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 or call 1-800-245-7627 x1535. Our Fall 2010 Telephone Seminar schedule is available online at 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.

For Further Information, Please Contact Us:

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Solutions You Can Count On

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