



October 2014

BREAKING NEWS

Clarification on AFHMP Review and Approval Guidance

HUD released clarification regarding the review and approval of Affirmative Fair Housing Marketing Plans (AFHMP) via a memo dated September 22, 2014. This memo clarifies the information released in a memo titled 'Fair Housing and Equal Opportunity Guidance on Affirmative Fair Housing Marketing Plan Review' dated May 15, 2014.

The memo explains when new plans are required or when existing plans should be reviewed.

- An initial AFHMP is required for:
 - » New projects
 - » Projects new to Multifamily assistance, such as those projects transitioning to Project-Based Rental Assistance (PBRA) program through the Rental Assistance Demonstration (RAD) program
- Owners should review an existing AFHMP in the instances noted below. If the owner's analysis of an existing plan finds that the plan is satisfactory, no further documentation is required by HUD. If the owner's analysis of an existing plan determines that the current AFHMP requires revisions, an updated AFHMP must be sent to HUD for approval.
 - » At least five (5) years have passed since the last review
 - » Significant demographic changes have occurred in the housing market area
 - » The local jurisdiction's Consolidated Plan has been updated
- Owners must also submit an updated AFHMP when requesting a residency preference. The memo lists John Hall, the Deputy Director of the Office of Asset Management and Portfolio Oversight in Multifamily Housing as the contact person for questions or more information. His contact information is 202-402-5907 or John.Hall@hud.gov

PMCS - Free Phone Class Giveaways

In honor of celebrating our 25th Anniversary this year, we are giving away a FREE PHONE CLASS to every 25th phone class registrant.

Congratulations to our September Winners:

Karen F., Logan Park Elderly Housing, Braintree, MA

Joanne A., PMG Properties Inc., Woodland Hills, CA



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www.pmcs-icap.com

Where We Will Be
LeadingAge Annual Meeting and Expo
Nashville, TN
October 19-22, 2014

NAHMA Fall Meeting
Washington, D.C.
October 26-28, 2014

TRACS Industry Meeting
Washington, D.C.
October 29-30, 2014

BREAKING NEWS

SAVE System Update scheduled for September 28, 2014

Effective September 28, 2014, when logging in to the SAVE system via the current website, you will be redirected to a new SAVE website. Once redirected, PMCS encourages you to bookmark this website for future use and access. Your user ID and password will be the same.

For users who have questions regarding access to the Save System, please refer to the following resources available:

SAVE customer support at 1-877-469-2563 or SAVE.HELP@dhs.gov

For SAVE registration assistance, contact SAVERegistration@uscis.dhs.gov

You may also visit our website, pmcs-icap.com, for more information.

Appeal Process Revised for Tenant Complaints

On September 4, 2014, HUD issued Notice H 2014-12 (Implementation of Tenant Participation Requirements in accordance with 24 CFR Part 245). The part that changed was Section F, detailing the appeal procedure for tenants or tenant organizations when complaints haven't been resolved at the local level.

The enforcement process begins with a tenant or tenant organization filing a written complaint with the local HUD office, alleging a consistent pattern of HUD program requirements or one violation that caused serious harm to tenant or the public. A list of items that can be used as factual evidence supporting the claim is provided.

If, after investigating, the Hub Director doesn't find reasonable cause to support the complaint, the Director will close the case.

If the case remains open, the Hub Director will bring the parties together to try to conciliate, which is voluntary. If appropriate, the Hub Director signs a conciliation agreement. If, after investigating, the Hub Director doesn't find reasonable cause to support the complaint, the Director will close the case. If there is a signed conciliation agreement, the case will be closed; however the Hub Director can re-open it if either party breaches the agreement.

The Hub Director could pursue Enforcement action after owner notification and a chance to respond. If the owner fails to respond or to address the issue(s) in a satisfactory way, then a referral will be sent to Enforcement and the owner will be flagged in APPS (Active Partners Participation System).

If one of the complainants disagrees with the Hub Director's decision, s/he can request that the case be reconsidered by sending a letter to Headquarters. HUD will then invite all parties to submit any additional evidence, will review the evidence and then inform the parties of its decision.

BREAKING NEWS

TRACS 202D MAT Guide Posted

The latest MAT Guide (Monthly Activity Transmission Guide) for TRACS 202D has been posted by HUD. From the main 'TRACS Documents' website, choose the '202D MAT Guide' link. We recommend that you download or print a version of this guide.

Information regarding certification/voucher processing information was previously in Chapter 9 of HUD Handbook 4350.3 but was removed in August 2013 with the release of Change 4. Chapter 7 of the MAT Guide now includes this information. This guide is now the only source of guidance regarding the transmission of certifications and vouchers.

TRACS 202D includes numerous changes to certifications, vouchers, and electronic transmissions. The guide explains new codes on certifications, how repayments will now be recorded on vouchers, and other changes to processing.

October Phone Classes:



- *MOR Preparation: Shooting for Above Average and Superior*
- *TRACS 202.D: The New Voucher*
- *TRACS 202.D: The New 50059s*

PMCS offers a variety of live phone classes that are designed to meet the demanding needs of the Affordable Housing Industry. Our 90-minute phone training is a cost effective, convenient solution for you and your staff. The interactive format is an excellent opportunity for questions and answers and our trainers will stay on the line until all questions are answered. **Visit our website for more information: www.pmcs-icap.com**

MONTHLY NEWS

Service Animals Are Not Pets

When you have a tenant who is asking for a service animal as a reasonable accommodation, be sure to handle the request carefully. Remember – these animals are not treated as pets.

Even “Dear Abby” is addressing issues about people who have service animals. This article should be shared with your entire staff. It is well written and gives you an idea of how a person with a service animal experiences situations on a daily basis. “Abby’s” response is really good advice to all of us in this industry.

Dear Abby: I use a service dog, and I’m constantly barraged with requests to pet him. Other people who use service dogs warned me this would happen. Although the Americans with Disabilities Act does not require him to wear a vest, I bought one for him that reads, “Do Not Pet,” which he wears in public. They ask me anyway!

They also ask what I use the dog for. Sometimes I’m tempted to say: “First, tell me about your medical history and then I’ll tell you mine.” I don’t mind quietly and discreetly discussing with a store owner what my dog does, but for a stranger to walk up and expect me to share personal information is rude.

As excited as I am about how my dog has expanded my life, I do not want to spend my time answering strangers’ questions or hearing about every dog they’ve ever owned. Obviously, I’m still learning what it means to live with a service dog. Would you kindly share with your readers proper etiquette with service dogs and their owners?

— Living Larger in Washington State

Dear Living Larger: I’m happy to. But you must be realistic. If you have a service dog, you must accept that people will be curious. However, what many people fail to understand is that when a service dog is out in public, the animal is working and should not be distracted from its task – which is ensuring the well-being of the owner.

The basics for interacting with service dogs are:

1. *Always speak to the person first. Do not try to distract the dog.*
2. *Never touch the service dog – or any dog, for that matter – without first asking for and receiving permission.*
3. *Do not offer food to the animal.*
4. *Do not ask personal questions about the handler’s disability or otherwise intrude on his or her privacy.*
5. *Do not be offended if the handler refuses to chat about the service dog.*

Phillips, Jeanne. “Dear Abby: Owner: Leave Service Dog Alone.” Azcentral.com. 11 Apr. 2014.

Q&A

Question:

I have an applicant that delivered a child three days before she moved in. When she came to sign her documents and receive the keys to her new unit, I told her she had 90 days to provide me with verification of her new daughter’s social security number. Did I handle that correctly?

Answer:

Unfortunately, no. This is a common misinterpretation of the regulations related to the disclosure of social security numbers that have been in effect since January 31, 2010. Applicants must disclose and provide verification of the complete and accurate SSN assigned to each household member, prior to being admitted to the property. There are two exceptions to this rule: 1) those claiming ineligible, non-citizen status and 2) individuals age 62 or older as of January 31, 2010 and whose initial determination of eligibility began before January 31, 2010.

The 90-day extension only applies to new members, under the age of 6 without an assigned SSN, being added to an existing household (an in-place tenant household).

In your scenario, if the applicant had moved in and then delivered her child after move-in, the extension could be granted.

See Section 3-9 of HUD Handbook 4350.3 REV-1 CHG-4 for a full description of the SSN disclosure requirements for applicants versus tenants.