

# Are You Ready for Your MOR?

~~UNPREPARED~~



Nicholas Vranes  
Compliance Manager  
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# Agenda

- Keys to Success - How to prepare
- Scoring and Ratings
- What we have seen so far

# What is an MOR?

- **Management and Occupancy Revue**
- One of the tools HUD uses to monitor a project to ensure that the owner/agent is complying with their HAP Contract, Management Certification, and HUD rules and regulations

# MORs- Things to Consider

- No MORs since August 2011...until now
- Will visit every property by December 2017
- Updated Forms
  - HUD-9834 was implemented in March 2013
  - Change 4 to HUD Handbook 4350.3

# Keys to Success

- Preparation
- Documentation
- “Telling the Story”



# General Appearance

- First Impressions Count
  - Grounds and landscaping
  - Parking lot
  - Signage
  - Garbage areas
  - Lighting
  - Stairwells
  - Management office



# General Appearance

- Walk your property weekly
- Repair what you can
- Compile a list of all of the improvements or repairs you have completed over the last 2-3 years and provide this to the reviewer. This will provide them with good context.
- Discuss any future plans for the property

# Security

- Don't be caught off guard- know your stats.
  - If they are good then brag
  - If they need improvement, be prepared to discuss what you've been doing to address it including
    - lease violations
    - invoices for cameras, fencing, or lighting
    - eviction proceedings documentation



# Follow-up & Monitoring of Project Inspections

- Almost all MORs will include REAC follow-up.
- At the reviewer's discretion a sampling of EH&S and non-EH&S deficiencies will be reviewed

# Follow-up & Monitoring of Project Inspections

- Complete a 100% unit inspection so there are no surprises the day of the MOR.
- Make sure all of the EH&S deficiencies remain corrected
- Assess non-EH&S corrections by level.
  - If they aren't corrected, have a plan in place to correct them. Have this plan available for the reviewer.

# Maintenance & Standard Operating Procedures

- Preventive maintenance schedules
  - If you have checklists or forms that are actually completed—even better.
- Unit inspection policy
  - Make sure you are following it. If your policy says quarterly, but you are only doing annual, update your policy before the MOR.
- Show that all units have been inspected within the last year.



# Maintenance & Standard Operating Procedures

- Review your work order log for accuracy
  - Are completion dates on the work order?
  - Are emergency work orders completed within 24 hours?
  - Are routine work orders completed in a reasonable timeframe?
- Be prepared to discuss any anomalies

# Leasing and Occupancy

- This section accounts for 1/3 of the overall rating in a PBCA MOR (25% of the total 75% that is rated)
- Review your critical documents for compliance
  - Application packet
  - Tenant Selection Plan
  - Waiting List
  - Affirmative Fair Housing Marketing Plan
  - EIV Policies and Procedures



# Leasing and Occupancy

- Tenant Selection Plan- does it include all required discussions?
- Waiting List- is it clear that tenants were selected in the proper order? Were any tenants skipped, and if so, are there notes as to why?
- Application- has it been updated to include sex offender registration questions? Does it comply with HUD's new Equal Access Rule?
- EIV Policies and Procedures- do they cover all necessary topics? Is it followed?

# Leasing and Occupancy

- Resident files- are they secured in locking file cabinets?
- Recertifications- are they consistently completed on time? Are reminder notices sent out at the correct timeframes?
- Resident charges- are they assessed accurately and consistently?
- Forms- are all HUD forms in use the current, correct version?
- EIV Use- are EIV Reports printed? Is there evidence of appropriate follow-up?
- Repayment Agreements- are they compliant with HUD guidelines? Are they enforced?

# Leasing and Occupancy

- Fair Housing- are the Fair Housing posters and the SHCC Call Center posters displayed in the rental office? Is the complete Fair Housing Logo on your site sign and advertisements? If you list a telephone number, do you also list a TTY, TDD or other alternative – even on your site sign?



# Leasing and Occupancy

- Steps to complete Federal ISS Awareness training program
- <http://iase.disa.mil/eta/index.html#onlinetraining>
- Online Training Catalog page > CyberAwareness Challenge (for Federal, DoD and IC Personnel) > Launch New CyberAwareness Challenge Federal Version
- When the training is complete, print and maintain the Certificate of Completion.



# Tenant/Management Relations

- This is traditionally an area where properties underreport their efforts.
- Make sure site staff can relate how resident concerns are handled, and how tenant involvement is encouraged.
- Know what services are available in the community. The property gets credit for knowing where to refer tenants.



# Scoring & Categories

- Category percentages
  - General Appearance & Security- 10%
  - Follow-up and Monitoring of Project Inspections- 10%
  - Maintenance and Standard Operating Procedures-10%
  - ~~Financial Management/Procurement- 25%~~
  - Leasing & Occupancy- 25%
  - Tenant/Management Relations- 10%
  - General Management Practices- 10%

# Ratings

- Number rating
  - Superior: 90 – 100
  - Above Average: 80 – 89
  - Satisfactory: 70 – 79
  - Below Average: 60 – 69
  - Unsatisfactory: <59

# Overall Rating

- PBCA's do not assess Financial Management / Procurement.
- Once all categories have been calculated based on the rating value and percentage value, the total is divided by the total percentage points.



# Overall Rating

	Performance Indicator	Performance Indicator	Percentage of Overall Rating	Calculation
General Appearance and Security	Satisfactory	72	10%	8
Follow-up and Monitoring of Project Inspections	Satisfactory	72	10%	8
Maintenance and Standard Operating Procedures	Above Average	80	10%	8
Financial Management/ Procurement	Not Rated	N/A	N/A	N/A
Leasing and Occupancy	Below Average	55	25%	14
Tenant/ Management Relations	Above Average	80	10%	8
General Management	Satisfactory	70	10%	7
<b>Totals</b>			<b>75%</b>	<b>53</b>
<b>Overall Rating: Satisfactory (53 / 75 = 70.6)</b>				<b>71</b>

# General Tips

- **Have adequate staff available.** Staff must be available to accompany our reviewer into resident units, as well as to answer potential questions regarding resident files. Contrary to popular opinion, the more information provided, the better the result.
- **Attend training.** Staff that receive continuing education on HUD regulations are often better prepared for the MOR. This holds true for both new and seasoned site staff members.
- **Draw attention to the things you do well-** what do you do, or better yet, *what have you added*, since the last MOR in terms of physical improvements, safety measures, training, tenant services/involvement, or anything else you think we should know.

# What We've Seen So Far

## *Updated Forms*

- 92006- Supplement to the Application
  - expiration date is now 2/28/2019
- 91067- VAWA Addendum
  - expiration date is now 6/30/2017
- 27061-H- Race and Ethnic Data Reporting Form
  - expiration date is now 6/30/2017
- Declaration of Citizenship- updated with Change 4- two of the verification documents were removed
  -

# What We've Seen So Far

## *Assets*

- Couple of changes to note in Change 4:
  - Assets- if a resident is receiving periodic payments from a **retirement account** you must count the periodic payments as income. You do not count the remaining amounts in the account as an asset. This includes IRS and other similar retirement accounts.
  - Are you asking residents about periodic payments?

# What We've Seen So Far

## *TSP*

- **VAWA-** in Change 4 “Policies for applying VAWA protections” was added as a required TSP topic. Have you made this update? Are you applying protections based on the 2013 reauthorization (expanded to include sexual assault)?

**V**iolence  
**A**gainst  
**W**omen  
**A**ct

# What We've Seen So Far

## *Application*

- **HUD Notice H 2012-11-** State Registered Lifetime Sex Offenders. Your application for housing must:
  - Ask whether the applicant, or any member of the applicant's household, is subject to a lifetime sex offender registration requirements in any state.
  - Request a complete list of all states in which any household member has resided.



# What We've Seen So Far

## *Application*

- **HUD Notice H 2015-06-** HUD's Equal Access Rule.
- Outlines federal protections based on actual or perceived sexual orientation, gender identity, and marital status. Have you updated your application?
  - Do you list male, female, and decline to disclose options on the application?
  - Do you still ask about Marital status? Or do you just ask the HOH to classify each person: co-head, spouse, other adult, etc.?
  - \*If you define "family" in your Tenant Selection Plan, have you updated it to the new definition?

# What We've Seen So Far

- **HUD Notice H2015-10** on Excluding the Use of Arrest Records in Housing Decisions
  - Arrest record(s) must not be the sole basis for rejecting an applicant or terminating assistance/tenancy.
  - An arrest record can prompt you to review additional information and research what conduct prompted the arrest. However, action cannot be taken solely because of an arrest.
  - Review your Tenant Selection Plan (TSP) and House Rules- do you need to make updates?

# What We've Seen So Far

## *Income Limits*

- Updated Income Limits were released March 28, 2016. Do your recently transmitted 50059s include the new limits?

# What We've Seen So Far

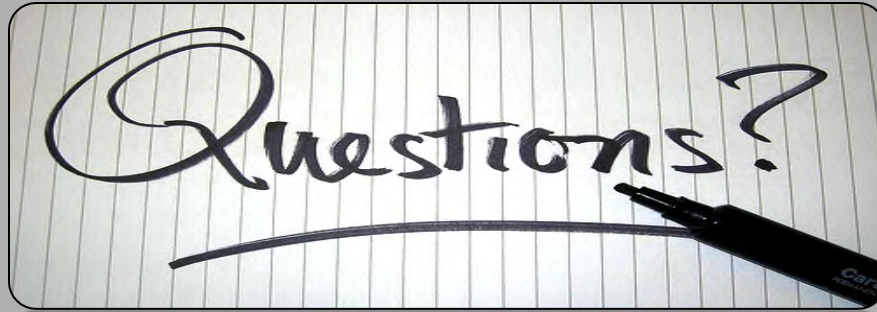
## *Most Common Findings*

- Application insufficient or non-compliant
- EIV Master File not maintained
- TSP insufficient or non-compliant
- 9887/9887-A missing and/or not signed/dated
- Wait List – insufficient notes or not auditable

# What We've Seen So Far

## *Most Common Findings as of 8/10/16*

- 36 MORs Emailed
- 552 Findings
- Average of 15 Findings per MOR
  - 0 Superior
  - 12 Above Average
  - 16 Satisfactory
  - 6 Below Average
  - 2 Unsatisfactory



**Nancy McIlhaney**  
**512-767-7722**  
**nancym@shccnet.org**

**Nicholas Vranes**  
**512-767-7743**  
**nicholasv@shccnet.org**

**Chris Petty**  
**512-767-7696**  
**chrisp@shccnet.org**