

SEMAP Success

Achieve & Maintain High Performance

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2016 Maintenance and Management Clinic

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SEMAP Success

Part I

Introduction and Review of SEMAP Success
FileSense Documentation System

SEMAP Success

Course Goals

- Enable High Performance
- Give Comprehensive Documentation
- Provide Basic Knowledge
- Provide Advanced Focus From Auditors

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What is SEMAP?

- So each man acts properly
- Section 8 Management Assessment Program
- PHA's way to monitor HCV Program Effectiveness
- HUD's way to monitor HCV implementation

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SEMAP Success Topics

SEMAP Resources

How to use SEMAP Success FileSense

Review for each Indicator

- What It Is
- Key Documents
- Auditor Questions
- Advanced Focus From Auditors
- Appeals
- Corrective Action Plans

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SEMAP Resources

SEMAP Success FileSense System

- Regulation and point explanations
- Document universe, sampling methodology, sampling size and QC results
- Forms, logs, policies, procedures, QC results

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How to Use SEMAP Success FileSense System

Based on 5 Steps

1. Policies & Procedures
2. Document Implementation of Procedures
3. Collect Samples and Perform Quality Control on Implementation Documentation
4. Score & Certify to QC Documentation
5. Maintain and Store the QC Documentation

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Walkthrough of SEMAP Success FileSense System

Flap 1:

- Regulations
- Define Universe
- Sample Size Calculation
- Sampling Methodology

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FileSense cont'd

- ✎ Flap 2: Policies and Procedures
- ✎ Flap 3: Document Implementation of Procedures
- ✎ Flap 4: Document Quality Control Testing
- ✎ Flap 5: Score and Certify

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Most Important SEMAP Operating Factors

- ✎ 95% PIC Rate
- ✎ Accurate VMS
- ✎ HQS – 25% of the Assessment!
- ✎ Do SEMAP QC throughout the year

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SEMAP Resources Cont'd

- ✎ Federal Register Notice: June 25, 2014
 - Biennial Inspections
 - Utility Allowance Schedule selection
 - 24 CFR, Part 985 SEMAP
- ✎ Streamlining Final Rule codifies these changes

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SEMAP Success Part II

Selection from the Waiting List & Reasonable Rent

Indicator 1: Selection from Waiting List – 0 or 15 Points

Did you select Applicants reaching the top of the WL and New Admissions pursuant to your Administrative Plan?

Scoring:

- 98% of Samples Pass, 15 Points
- Less than 98%, 0 Points



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Selection From Waiting List

Four Parts:

- Written Selection Process
- Follow Policies
- Sample Applicants at top of Waiting List
- Sample of Admissions to Program

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Best Practices Key Documents

- ☞ Admin Plan
- ☞ Definition of Pull Event (2 Options)
 - Pull to certify
 - Pull for briefing
- ☞ Definition of Top of Waiting List
- ☞ WL for each Pull Events
- ☞ List of applicants pulled

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Selection from Waiting List

How to do Quality Control for Both Parts

(This Process Is a Best Practice)

1. Define Universe
 - Per Regs Use Number of Admissions for Both Parts
2. Calculate Sample Size

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Best Practice QC Steps

Calculate sample size example:

- Use HUD's formula
- Admissions = 100
- First 50 = 5 samples
- Plus 1 for each 50 or part of 50 over 50
- Total = 6 samples

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Best Practice QC Steps Cont'd

3. Identify Samples For "Top of Waiting List" and compare samples to waiting list

- A. Make list of dates for each Pull Event
- B. Add number of Pull Events (example: 1 Pull Event each month is 12 events each year)

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Best Practice QC Steps Cont'd

- C. Randomly select sample Pull Events
 - Example:
 - 12 Events per year
 - 6 Samples needed
 - Select every other event
- D. Collect list of applicants for each sample Pull Event
- E. Compare the applicant at the top of the Pull List with the applicant at the top of the Waiting List

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Best Practice QC Steps Cont'd

4. Identify samples for "Admissions" and compare samples to Waiting List

- A. Run list of admissions
- B. Add number of admissions
- C. Randomly select samples
 - Example:
 - Number of admissions = 100
 - Number of Samples = 6
 - Divide 100 by 6 = 16
 - Select every 16th name as a sample

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Best Practice QC Steps Cont'd

- D. Compare each sample with Waiting List by identifying date of the Pull Event for each sample, and compare with the Waiting List as of that date
- 5. Use FileSense to document

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Auditor Questions

- Is HA following Applicant selection policies?
- What are the procedures for selecting/admitting families?
- Has HA adopted local preferences? If so, how is it determined that a family qualifies for a preference?

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Auditor Questions (cont.)

- Is there a clear document trail to support proper selection and admission?
- Failure to document could trigger fair housing reviews
- Did the HA preserve the WL on Pull Dates?
- Does the Pull List have the WL position number on it?

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Indicator 1: Advanced Focus

Compliant Waiting List required data

- Name
- Date & Time
- Preferences
- Voucher size
- Race & / or Ethnicity of Head of Household

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Indicator 1: Advanced Focus

Pass if following documents support each other:

- WL at time of pull
- Pull selection list
- Copy of application and pull letter
- Preserve the above for each pull event
- Watch for residency preference causing disparate impact

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Advanced Focus (continued)

Best Practice additional Waitlist Data

- Clear order of position
- Remake WL before each pull event
- Pulled date
- Notes

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Advanced Focus (continued)

Preference Warning

- Residency preference could cause fair housing issue
- Be careful of disparate impact on any protective class
- Do legal review

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Indicator 2: Rent Reasonableness

Do you have a policy and procedure in your Administrative Plan that is reasonable and includes all nine characteristics?

Does the rent reasonableness document in the file show that you are following the policy and procedures in your Administrative Plan?



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Indicator 2: Rent Reasonableness Cont'd

Scoring:

- 98% of samples, 20 points
- 80-97% of samples, 15 points
- Less than 80% of samples, 0 points

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Indicator 2: Rent Reasonableness

3 Parts:

- Reasonable Written Policy with 9 characteristics
- Written Procedures
- Documents showing procedure implemented Policy for each determination in tenant file

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Key Documents

Admin Plan Policy

Admin Plan Procedures

- *Are procedures reasonable per Auditor?*

Individual Rent Reasonableness Determination reports in tenant files

- *Does the report support Policy and Procedures?*

Samples

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HUD's 9 Characteristics for Reasonable Rent

Location

Size

Type

Quality

Age of Unit

Amenities

Housing Services

Maintenance

Utilities Provided by the Owner

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Reasonable Rent How to do QC

(This method is a best practice)

1. Define Universe: "Number of Families Assisted" add the following:
 - # of Participants at Beginning of Program Year
 - # of New Admissions from Waiting List
 - # of New Admissions from Project Based Voucher, VASH, Family Unification, etc. not on WL
 - # of Port Ins

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QC cont'd

2. Add total number of families assisted
3. Determine and document sample size
4. Randomly select sample from the HAP ledger for last month
5. Use web-based random selection tool or divide number of admissions by number of samples to get variance number

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QC cont'd

6. Review Administrative Plan for "reasonableness" and all 9 characteristics
7. Pull sample files and check for Rent Reasonableness (RRD) documentation during Program year.
8. If RRD was not required go to next name on HAP ledger
9. Document in FileSense

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Auditor Questions

How do Rent Reasonableness Determination (RRD) forms in files support PHA Policy?

- Is there a list of samples and results of QC checks and scoring?
- Is there an explanation of how Policy and Procedures are reasonable that includes all 9 characteristics?

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Advanced Focus

- Clear explanation of system of comp analysis
- Watch for FMR decreases by 5%
- 12 month comp data
- Stay away from opinions of "Reasonable"



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SEMAP Success Part III

Determination of Adjusted Income, Utility Allowances, HQS Quality Control Inspections
&
HQS Enforcement

Indicator 3: Determination Adjusted Income

- Did Agency correctly calculate adjusted annual income including:
- All required verifications
 - Documents to show why 3rd party not used
 - Correct deduction and allowance calculations
 - Correct utility allowance schedule



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Indicator 3: Determination Adjusted Income Cont'd

- Scoring:
- 90% of samples, 20 points
 - 80-90% of samples, 15 points
 - Less than 80%, 0 points

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Key Documents

- Admin Plan: Verification Hierarchy
- Clear Verification forms
- EIV Verification
- Clear UA Schedule with Implementation Procedures and effective date
- Comprehensive, User Friendly Application in same order as computer screen

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DAI
How to do Quality Control

1. Define Universe: Number of families assisted. Same as rent reasonableness
2. Add total number of families assisted
3. Determine and document sample size
4. Locate HAP ledger (last month of FY)
5. Randomly select samples from HAP ledger

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QC – cont'd

6. Use objective, automated system of recalculation
7. Diamond RIM is an example
8. Document in SEMAP FileSense
9. Do monthly or quarterly QC

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Key Auditor Items

- ☞ Compliance with Utility Allowance being *the lesser* of voucher size or Actual Number of Bedrooms as of July 1, 2014
- ☞ Are PHA calculations the same as mine?
- ☞ Adequate samples for QC
- ☞ EIV, Regulations, Notices, Letters, Q&A's

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Advanced Focus

- ✎ As DAI is the most failed indicator, take steps for ongoing calculation accountability and improvement
- ✎ Make sure Contract, Lease, RFTA, Inspection Book and Calculation Sheet all have same utility structure
- ✎ Objective and consistent QC
- ✎ Staff learn by each review
- ✎ Use a Real Time System

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Indicator 4: Utility Allowance Schedule – 0 or 5 points

- ✎ SEMAP Standard
 - Maintain up-to-date allowance
 - Reviewed at least every 12 months
- ✎ Utility Allowance Schedule
 - Implementation and documentation of changes
 - If a utility category changes 10% or more, revise UA

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Indicator 4 Cont'd

- ✎ Scoring:
 - Reviewed and adjusted if needed within 12 months, 5 points
 - More than 12 months, 0 points

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Indicator 4: Utility Allowance Schedule cont'd

Establishing Utility Allowance

- Resident Life Utility Allowance as an example
- Normal consumption patterns of Community, not Individual

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Indicator 5: HQS Quality Control Inspections – 0 or 5 points

Using a qualified inspector, the Agency performs the proper number of quality control inspections for current contracts including the following 3 components:

- Recently completed inspections (3 months)
- Cross section of neighborhoods
- Cross section of inspectors

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Indicator 5 Cont'd

Scoring:

- All samples meet specifications, 5 points
- Less than all, 0 points

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Quality Control Inspections
How to do SEMAP QC

(Best Practices)

1. Define universe as the number of units under HAP Contract for the FY
2. Use number of units under HAP Contract to calculate sample size
3. Run a report that shows all units that were inspected within the past three months with the inspector's name.

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QC- cont'd

4. Select a cross section of inspectors and neighborhood
5. Perform the QC inspections
6. Complete the HQS QCI log in FileSense for proper documentation as the QCI's are performed

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Key Documents

 HQS Quality Control Inspections (QCI) Log that shows:

- List of inspectors
- List of neighborhoods/areas with similar stock
- Mandatory number of QCIs
- Name of Client
- Name of Reviewer

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Key Documents Cont'd

☞ HQS QCI Log that shows (cont.):

- Name of Inspector
- Date of Inspection being reviewed
- Date of QCI
- Area of Assisted Unit

☞ Some reviewers want Pass/Fail and date repairs made

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Advanced Focus

☞ Use HQS Fail Item Questionnaire for Tenants

☞ Use Real Time System

☞ Consider simultaneous inspections

☞ Give Inspector Feedback



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Indicator 6: HQS Enforcement – 0 or 10 points

The Agency implements compliant HQS enforcement including:

- 24-Hour Corrections
- 30-Day Corrections
- HAP Abatement
- Contract Termination
- Family Obligation Enforcement

☞ Scoring:

- All samples meet the 24-hour specification and 98% of samples meet remaining specs, 10 points
- Less than all, 0 points

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HQS Enforcement
How to do QC (Best Practices)

1. Define universe as the number of units that failed HQS within the FY
2. Determine the number of units failing inspection and calculate sample size
3. Obtain a report of all units failing annual inspections

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QC – cont'd

4. Use this report to randomly select the sample
5. Pull the tenant files for the samples
6. Use the HQS Enforcement log in FileSense to document the Q.C.

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Key Documents

Log that includes:

- Participants sampled
- Dates of Inspection, 24-hr repairs, 30-day repairs, extended repairs, abatement and contract termination, participant transfer, participant terminated
- Action Type of Participant action
- Individual sheet with above data for individual file reviews

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Auditor Items

- ✎ Correct universe of all contracts
- ✎ Use list of all failed annuals to select samples
- ✎ Document all parts
- ✎ Document all dates

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Advanced Focus

- ✎ Clear and present HQS books, letters, and passed documentation
- ✎ Quarterly review, at least

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SEMAP Success Part IV

Expanding Housing, Opportunities, Payment
Standards, Annual Recertifications

Indicator 7: Expanding Housing Opportunities 0 or 5 Points

- For the metropolitan FMR areas only, the Agency takes six steps to expand housing opportunities including the following:
- Step 1- Policy to recruit Owners in un-impacted areas of poverty and minority
- Must be in Admin Plan
 - Include Actual Recruitment Steps that MAY be taken
 - Consider being member of Landlord Group, Ads for selected communities, prospective landlord meetings, and flyers

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Indicator 7: Expanding Housing Opportunities 0 or 5 Points (continued)

- Step 2- Verify actions to implement Policy
- Maintain an outreach electronic or manual folder
 - Save evidence of all outreach efforts

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Indicator 7: EHO

- Step 3- Maps
- Show areas outside Poverty/Minority concentration in own and neighboring jurisdictions
 - Characteristics of these areas
 - Evidence that maps are used at Voucher Briefings, put into VBS Packet

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Indicator 7: EHO

Step 4 – Owner List

- List of vacant units in target areas and landlord name and contact info is best list
- List of landlords who own property in target areas
- List of agencies you may help find units in target areas

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Indicator 7: EHO

Step 5 – Portability Explanation

- How portability works
- List of port contracts for own and surrounding agencies
- Sample port explanation in SSFS

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Indicator 7: EHO

Step 6 – Unit Location Difficulties

- Show analysis of difficulties
- Show analysis of need for exception payment standards, if needed
- Proof of requesting HUD approval
- Keep success rates per BR size based on date received the voucher

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Expanding Housing Opportunities
Scoring

- Meets all specifications, 5 points
- Does not meet all, 0 points

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Auditor Review

- Adequate maps with information for Voucher holder
- Sufficient recruitment of landlord in target areas
- Good portability explanation

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Advanced Focus

- Define Concentration of poverty and minority
- Comprehensive documents
- Check for documents at mid-year
- Put percent for concentration in Admin Plan
- Census Bureau uses 30%

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Indicator 8: Payment Standards – 0 or 5 points

The Agency established a Payment Standard within the FY that is between 90-110% of the FMR or the Agency gets HUD approval for a PS between 80-89% or 111-120% of the FMR.



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What is Payment Standard?

- Dollar amount based on FMR
- If Contract Rent plus Utility Allowance (Gross Rent) is = or < PS
 - Tenant pays 30% of MAI for rent share
- If gross rent > PS
 - Tenant pays more than 30% of MAI for rent share

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Why is Payment Standard Important?

- Determines the number of families to help
- Affects budget authority utilization
- Tools for Equal Housing Opportunity

75

Auditor Review

- ☞ Dated, clear PS Schedule
- ☞ Does the Agency have any areas designated for a HUD approved exception rent?
- ☞ Does the Agency have more than one FMR schedule?

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5 Point Analysis to set Payment Standard

- ☞ 1. YTD Budget Authority Utilization
 - Use HUD Budget email
 - Use Voucher Management System (VMS) monthly report
 - Use PIC Lease-UP Report if available
 - Use Internal Reports

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Analysis (continued)

- ☞ 2. YTD Unit Months Leased
 - Use HUD Budget Letter
 - Use VMS
 - Use PIC lease-Up Report
 - Use Internal Report

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Analysis (continued)

3. Determine Rent Burden by BR Size

- Divide Tenant Rent by monthly Adjusted Income
- Example:
 - MAI = \$1,000
 - TR = \$300
 - $\$300 / \$1,000 = 30\%$
- What is a high rent burden?

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Rent Burden (continued)

By BR size, determine the number of participants who have a rent burden in these areas:

- 20-29%
- 30-39%
- 40-49%
- 50% plus

80

Analysis (continued)

4. Port In's and Outs

- Are too many families leaving? (Too low)
- Are too many families coming into jurisdiction? (Too high)
- What are PS's in neighboring programs?

81

Determining the Payment Standard Schedule

! MILLION DOLLAR QUESTION!

- Based on the analysis what affect do you want the PS to have on your HCV Program

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PS Schedule

Optional affects of payment standard on HCV Program

- If need to increase utilization, raise PS, but may reduce total number of units that can be leased
- If need to increase success rate, raise PS, for specific BR size.

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PS Schedule (continued)

- HUD may want an increase in PS if 40% of participants pay more than 30% of MAI
- If need to decrease rent burden, increase PS by BR Size.
- If need to decrease port ins, make PS same as neighboring programs if it does not hurt another aspect of HCV
- If need to decrease port outs, consider increasing PS

84

Implementing New Payment Standard Schedule

 Implementation Options

- Make effective date 90 days in advance to avoid rent share re-calcs
- Or, make effective date immediate and have a policy that the new PS only affects rent share calculations that have not been made.

85

Indicator 9: Annual Reexaminations – 0, 5, or 10 points

 The PHA must complete a reexamination for each participating family at least every 12 months

 PIC SEMAP Indicators Report shows the percent of families with late annual reexaminations

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Indicator 9 (continued)

 PIC Late Re-exam Discrepancy Report gives list of families whose annual reexamination is late

 Scoring:

- Less than 5% are late, 10 points
- 5-10%, 5 points
- +10%, 0 points

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Annual Re-Exams How to do QC

1. Run PIC report monthly
2. Use file review form for manual back-up
3. If manual QC is used, consider all re-exams as universe and do sample number and selection

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Key Documents

Log showing number of:

- Samples
- Clients sampled
- Date of previous Annual Re-Exam (AR)
- Date of current AR
- Pass/Fail reference to PIC Report
- Score calculation

89

Advanced Focus

- Two months grace period is no longer given to enter data into PIC
- Follow-up immediately on any tenants listed on the discrepancy report
- Have written annual re-exam production schedule

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Components of Annual Recertification Production Schedule

- ☞ Run List of Applicants
- ☞ Send appointment letters or packets
- ☞ Hold interviews or review packets
- ☞ Get final verifications
- ☞ Calculate rent shares
- ☞ Send rent share notice and HAP contract addendum

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SEMAP Success Part V

Correct Tenant Rent Calculations, Pre-Contract
HQS Inspections, Annual HQS Inspections and
Lease – up

Indicator 10: Correct Tenant Rent Calculations – 0 or 5 points

- ☞ Correctly calculate family Rent-to-Owner
- ☞ PIC SEMAP Indicators Report shows percent of all families with family rent discrepancies
- ☞ PIC Tenant Rent Discrepancy Report gives list of families with rent discrepancies
- ☞ Scoring:
 - 98% Correct per PIC, 5 points
 - Less than 98%, 0 points

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Correct Tenant Rent Calculations How to do QC

- Run PIC report monthly
- Objective, automated manual QC system
- Diamond RIM as example
- Use same Universe, size, & methods as the DAI Indicator

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Key Documents

- All verifications related to income and rent calculation
- QC Sample Log with results
- Admin Plan
- User friendly and complete application

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Auditor Items

- Are my calculations the same as the HA calculations?
- Good Sample documents
- HAP matches the HAP Register
- Failed DAI score can cause CTRC score change

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Advanced Focus

- Objective and consistent QC
- Staff learn by each Review
- Real time QC

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Indicator 11: Pre-Contract HQS Inspections – 0 or 5 points

- Agency passes Contract units before effective date of Lease and Contract per SEMAP PIC Report
- Scoring:
 - 98% of all initial leases in PIC meets specifications, 5 points
 - Less than 98%, 0 points

98

Key Documents

- Present an accurate Lease and Contract
- Inspection books with clear pass dates

99

Pre-contract Inspections
How to do QC

- Run PIC report monthly
- Use new contracts for the year as Universe if manual QC

100

Auditor Items

- Some Auditors will accept pass date and L & C date as same date

101

Advanced Focus

- Quarterly Reviews for early detection
- Clear Documentation
- Show pass date per fail item


102

Indicator 12: Annual HQS Inspections

☞ Inspect each unit within 12 months, unless doing Biennial Inspections

☞ Scoring:

- Less than 5% are late, 10 points
- 5-10%, 5 points
- +10%, 0 points

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Annual Inspections How to do QC

☞ Monthly PIC SEMAP report

☞ For manual back-up, use file review form

☞ Key Documents:

- Log showing:
 - Client name
 - Date of current inspection
 - Date of previous inspection
 - Pass/Fail indication

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Advanced Focus

☞ 2 month grace period for PIC is no longer granted

☞ Have production schedule

☞ Resolve discrepancies immediately

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Indicator 13: Lease-Up
– 0, 15, or 20 points

- Full Lease-Up of allocated budget authority
- UML Lease-Up up to base line unit months or units supported by allocated budget authority, which ever is lower
- Effective as of each December 31st


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Indicator 13: Lease-Up
– 0, 15, or 20 points (Cont..)

Scoring:

- 98% Utilization or Unit Months Leased, 20 points
- 95%- 97%, 15 points
- Less than 95%, 0 points

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Auditor Review

- Per SEMAP PIC Report for December 31st
- PIC may show data as not available
- PIC is based on VMS monthly report

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Key Documents

- Budget e-mail from HUD
- Monthly Tracking
- VMS Monthly Reports
- PIC Lease-Up Report

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Advanced Focus

- PIC and VMS should give
- Lease-Up Planning
- Use HUD utilization tool or similar tool
- Use only calendar year, not fiscal year
- Do not exceed Budget Authority

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SEMAP Success Part VI

Family Self-Sufficiency (FSS), De-concentration
Bonus, SEMAP Certification, Appeals &
Confirmatory Reviews

Indicator 14: Family Self-Sufficiency – between 0 and 10 points

2 Parts:

- Enrolled number equal to slots required minus graduations
- Percent of escrows:
 - Number of families with escrow divided by number of families with PIC progress reports

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Indicator 14 Cont'd

Scoring:

- Sliding scale based on percent enrolled and percent with escrows
- Maximum points, 10

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Key Documents and Advanced Focus

- Verification of required slots
- Contract of Participation
- Escrow Notices to Participants
- Escrow on General Ledger each month

114

Auditor Items

- For Mandatory Programs
- Proper support documents
- Is Agency reducing mandatory slots when FSS participants graduate?

115

Advanced Focus

- Are escrows calculated during the annual re-exam process?
- Is the FSS Action Plan up to date?

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De-concentration Bonus Indicator – 0 or 5 points

- A metropolitan PHA may submit data to HUD which shows the extent to which Section 8 families with children live in low poverty areas or move to low poverty areas
- A PHA must meet one of three criteria to qualify for 5 points under the bonus indicator

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De-concentration Criteria

☞ The PHA must maintain data which show:

- Half or more of all Section 8 families with children assisted by the PHA in its principal operating area resided in low poverty census tracts at the end of the last PHA Fiscal Year

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De-concentration Criteria (continued)

- The percent of Section 8 mover families with children who moved to low poverty census tracts in the PHA's operating area during the last PHA FY is at least two percentage points higher than the percent of all Section 8 families with children who resided in low poverty census tracts at the end of the last PHA FY; or
- Same as above, but during the last two PHA fiscal years

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Key Documents

☞ Spreadsheet to monitor moves to areas of low poverty

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Advanced Focus

- ✎ Proper identification in Admin Plan and verification of percent to use for impactation
- ✎ Correct identification of impacted zip codes with 2010 Census Data

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Completing and Submitting SEMAP Certifications

- ✎ Approve by BOC resolution
- ✎ Can disagree with PIC if PIC is wrong
- ✎ If late or not submit, receive troubled rating
- ✎ Use SEMAP Success FileSense System

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Completing and Submitting SEMAP Certifications (continued)

- ✎ Submit to HUD 60 calendar days after end of fiscal year
 - FYE March 31st – Submit May 30th
 - FYE June 30th – Submit August 29th
 - FYE September 30th– Submit November 30th
 - FYE December 31st – Submit February 28th

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SEMAP Score Appeals

- ✎ Provide justification in writing and via PIC SEMAP 30 CDs after HUD notification letter
- ✎ Only if it would change performance designation

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Confirmatory Reviews

- ✎ HUD must perform to change from troubled status.
- ✎ If HUD is late and following FY passes, still cannot change rating.

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Required Actions for any Failed SEMAP Indicators

- ✎ Correct deficiency in 45 days after HUD notice
- ✎ Send HUD a written report
- ✎ Failure to correct may lead to required Corrective Action Plan (CAP)

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