

Management and Occupancy Review

Achieving a Successful Review

Jay E. Fleming

NLHA Conference
October 2008

Preparation - PBCA

- Scheduling letter
 - Sent 14-30 days in advance.
 - “Blue print” of what will be performed during the MOR.
 - Instructs which documents are needed, and/or reviewed.
 - Owners should ensure the site staff are aware of the scheduled date.

Preparation

- **Advance Preparation**
 - **Review** the most **recent REAC** inspection and assess any outstanding issues.
 - All EH&S items corrected. Owner has one year to correct non-EH&S items.
 - Review resident files to identify any concerns related to calculations, allowances, etc...
 - Prepare list of vacancies, if applicable.

Preparation (cont.)

- **Advance Preparation**
 - Documentation of annual unit inspections, if not maintained in the files.
 - Check **vouchers** for past 12 months.
 - Submitted a complete voucher by the 10th of each month.
 - Special claims.

Organization – O/A

- **Policies and Procedures**
 - Provide procedure manuals for review.
 - Provide waiting lists, maintenance logs, etc... for review and/or copies.
 - Forms and documents are updated, current, and completed accurately, including Lease, House Rules, TSP, etc...

Organization – O/A (cont.)

- Current management certifications, AFHMP, rent schedules, etc...
- Lead-based paint studies, if project built **prior to 1978**. (non-elderly only, with exceptions)
- Outstanding issues from last year's MOR.
- Preventive maintenance schedule and written work order procedures.
Backlogged work order documents.

Organization – O/A (cont.)

- Inventory Log indicating the serial numbers, model numbers for appliances, etc...
- Security issues, police reports.
- Documentation of recent training.
- Training schedule.

Organization – O/A (cont.)

- Documents should be secured in the files.
- Documents pertaining to specific certifications should be together in the order of the certification.
- Documents signed and dated appropriately.
- Documentation is key.

General Information

- “Management Reviews are intended to be a complete and detailed look at the systems and procedures in use at the project, covering all aspects of project management. 6 - 6-2(a)”.
 - Snapshot-day of MOR.
 - Corrections made after the MOR, typically will not change the overall rating.
 - Repeat conditions/findings may affect the overall ratings.

General Information (cont.)

- **On-site Reviewer-Follow up**
 - Confirm that **repairs** required as a result of the **last REAC** have been **made** (sample of units and common areas).
 - Confirm **EH&S** issues were **mitigated** as certified by the O/A.
 - **Report any EH&S observed** during the review.

General Information (cont.)

- **Follow Up and Monitoring**
 - **CA Responsibilities**
 - **Sample of units** to confirm REAC repairs certified by the owner/agent were completed.
 - **Record and notify the owner/agent** of any **EH&S** conditions noticed on-site.
 - **If conditions noticed, require correction within 3-days.**

General Information (cont.)

- RHIIP Listserve and HUDclips
 - Subscribe to RHIIP
 - Check HUDclips frequently for updates to keep abreast of any changes.
 - Not CA responsibility to notify O/A of changes, however, we do it to help O/A.
 - Eliminate conditions/findings.

General Information (cont.)

- **Missing Documents**
 - Take the opportunity to look for documents the reviewer could not locate while reviewing the file before the exit interview.
 - Reviewer may have overlooked.
 - Reduce or eliminate condition/findings from being included on the 9834 report.

Close out/Exit interview session

- **This is not the report**
 - Not all inclusive, but enough information for O/A to begin future corrections.
 - Be aware of this, to eliminate the “shock factor” when final report is released 30 days later.

For more information

- Jay E. Fleming
Sr. Program Compliance Specialist
- jfleming@inquadel.com
- 317-656-8808
- Quadel corporate email addresses:
info@quadel.com, training@quadel.com,
lihtc@quadel.com, careers@quadel.com
- <http://www.quadel.com>