

- ⇒ Term of Voucher
- ⇒ PHAs in the Spotlight
- ⇒ Section 3
- ⇒ Ask the PHRS
- ⇒ Ask the FA
- ⇒ Financial Submissions
- ⇒ System Access Changes
- ⇒ Bridge to Truth



A monthly insight into the Detroit Office of Public Housing

bridging the gap

Term of Voucher/ Reasonable Accommodation - Housing Choice Voucher


by Angela Foster, PHRS



Hello, my name is Angela D. Foster. My career in Public Housing expands over 24 years, 11 of which have been with the U.S. Department of HUD where I serve as a Public Housing Revitalization Specialist (PHRS). Searching for safe, decent, and sanitary housing can be a stressful time for Housing Choice Voucher holders. Even after a briefing, many voucher holders still struggle understanding the HCV process. They have a lot to take into consideration when looking for housing while trying to do so before the voucher expires. They face many challenges such as the lack of housing with the proper bedroom size and affordable rent, lack of housing in the area they prefer, a lack of transportation, and ensuring they have accessibility to schools, shopping and medical facilities. So, what can we do to help? [HUD's Code Federal of Regulations](#) offer avenues of flexibility so PHAs can use discretion when developing its administrative plan to help eligible families obtain suitable housing by extending their time to look. Given the housing climate in Michigan, time is not always a voucher holder's friend.

- ⇒ [982.303 \(a\)](#) states, "Initial term. The initial term of a voucher must be at least sixty-(60) calendar days. The initial term **must** be stated on the voucher".
- ⇒ [982.303 \(b\)\(1\)](#) states, "Extensions of term. At its discretion, the PHA **may** grant a family one or more extensions of the initial voucher term in accordance with PHA policy as described in the PHA administrative plan. Any extension of the term **is granted by PHA notice to the family**".
- ⇒ [982.303 \(b\)\(2\)](#) states, "If the family needs and requests an extension of the initial voucher term as a reasonable accommodation, in accordance with part 8 of this title, to make the program accessible to a family member who is a person with disabilities, the PHA must extend the voucher term up to the term reasonably required for that purpose".

HUD encourages PHAs to consider using these regulations to not only help families but also as a tool to increase lease up if you are a PHA identified as being below the 98% optimal lease-up level.

A portrait of a Black man with short dark hair, smiling at the camera. He is wearing a dark suit jacket over a light blue shirt and a patterned tie. His arms are crossed, and he is wearing a gold ring on his left hand. The background is a neutral, mottled brown.

willie.c.garrett@hud.gov

Map data ©2013 Google



by Anne Fiskien, PIH-Division Director

Housing Services started as a grass-roots community group aimed at addressing homelessness by asking for technical assistance from HUD to form a Continuum of Care. The then HUD Community Programs and Development Division (CPD) representative, Richard Wears, was assigned to provide that

In 2000, HSEC applied for the Section 8 Mainstream voucher funds and received a \$1.5 million, five-year renewable grant which it continues to administer. As a non-profit, 501 (c) 3, and not a typical housing authority, HSEC administers the only grant of this type in Michigan. It was also during this time that the agency added a down payment assistance program for first-time home buyers. This initiative has provided 40 households with education and matching funds to purchase their first home by leveraging over \$4 million in mortgages.

Over the past several years, as grant opportunities have arisen, the Executive Director, Denise Dunn, has proactively sought advice on preparing grant applications. One such "expert" was Charles Keiffer, who was the Michigan State Housing Development Authority's guru on homeless programs at the time. Mr. Keiffer assisted Ms. Dunn in becoming successful as the lead agency to go directly to HUD for funds. This move allowed HSEC to apply for additional Supportive Housing Program funds as bonus funds based on the HUD pro rata need to work with the homeless.

Annually HSEC's staff serves approximately 3,000 clients for all programs combining services for homeless prevention, foreclosure, and re-entry of prisoners in the community. What began as a \$2,500 gift from Eaton Federal Savings Bank for its articles of incorporation is today an agency with 13 employees and a nearly \$1.7 million budget.

Happy Holidays

Section 3 *Excerpt*



What is Section 3?

Section 3 is a provision of the Housing and Urban Development (HUD) Act of 1968 that helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent feasible, provide job training, employment, and contracting opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.

What is a Section 3 business concern?

A business that:

- Is 51 percent or more owned by Section 3 residents;
- Employs Section 3 residents for at least 30 percent of its full-time, permanent staff; or
- Provides evidence of a commitment to subcontract to Section 3 business concerns, 25 percent or more of the dollar amount of the awarded contract.

What programs are covered?

Section 3 applies to HUD-funded Public and Indian Housing assistance for development, operating, and modernization expenditures.

Section 3 also applies to certain HUD-funded Housing and Community Development projects that complete housing rehabilitation, housing construction, and other public construction.

What types of economic opportunities are available under Section 3?

- Job training
- Employment
- Contracts

Where to report Section 3 Compliance? On HUD.GOV Section 3 webpage.



Keep in mind only 2012 and earlier are available for reporting. 2013 and later is not yet available, however it is suggested you maintain the paper reporting so that you are prepared to upload the reports when they make them available.

**NEW REPORTING
FORM** *for*
FY 2013 Coming Soon!

**SUBMIT YOUR FY2012 or EARLIER
SECTION 3 (60002) REPORT HERE!**

GET STARTED NOW ►

The complete FAQ and all other information can be found at [Section 3 –Economic Opportunities](#)



Ask the PHRS

by Angela Foster, PHRS

Question: Are the Administrative Plan and the Admissions and Continuing Occupancy Plan, governed by HUD's Federal Rules and Regulations?

Answer: Yes, [960](#) and [982](#) respectively state that both plans must align with HUD's regulations in operating Low-Rent and the Housing Choice Voucher program. In other words, PHAs may establish policies using the discretions stated in the regulation but cannot arbitrarily make rules outside of the regulations that in some cases prevent eligible families from obtaining housing assistance

Example: At the time of admission, the background check indicates a family is not eligible to receive housing assistance because one of its family members is ineligible. HUD protects these families by giving the option for the head of household to remove the ineligible family member from the lease so the family can become eligible. The PHA cannot refuse the family housing assistance if the head of household removes the ineligible member from the lease.

PIC/EIV TIP

by Chandra Broadnax, PA

How exactly do you correct the head of household's social security number (SSN) on form HUD- 50058? If the Enterprise Income Verification (EIV) system's Identity Verification Report indicates that the head of household (HOH) SSN reported on line 3n of the form HUD- 50058 is incorrect, use the Office of Public and Indian Housing Information Center (PIC) Tenant ID Management tool to change the SSN as outlined on page 15 of the [Job Aid for Tenant ID Management](#) (published May 4, 2011).

Change SSN to new SSN*

In PIC, select Tenant ID Management, then click Replace ID on the blue bar. The screen below appears. Click the appropriate Modification Type 'SSN to SSN'. Input the old SSN to be replaced in the first box and the new SSN in the second box. Select the Invalid/Duplicate Status that matches the Invalid/Duplicate Status in the Invalid Tenant ID Re-

port and choose a Reason by clicking to highlight your choice, then enter a comment in explanation as shown in the screen below. Click Save to initiate the transaction. The update is done by an overnight process and will replace all instances of the SSN specified with the new SSN provided throughout the agency's tenant data by the following morning.

If you choose an Invalid/Duplicate Status that does not match the Invalid Tenant ID Report, the replacement process will fail. The result in either case will be reflected in the Tenant ID Modification Report the following day

***NOTE: You must never use this screen to replace a "dummy SSN" of the type ("999999999", etc.) formerly used for household members who had no SSN.**

For further assistance, please contact Chandra Broadnax, PA at chandra.m.broadnax@hud.gov.

Ask the FA

by Claunella Richardson, FA

Question: On form HUD-52723, can a unit that is occupied by a police officer (Section 2, Line 02) also qualify as a "special use" unit on Line 06a?

Answer: Yes, but only if the PHA requests and receives approval from the appropriate HUD Field Office. Approval requires submission and acceptance of documentation that the unit also meets all the criteria outlined in Section 4.5.4.a. of Notice PIH 2011-7 for Special Use – Anti Drug/Crime units. In this instance, the PHA would need to demonstrate, at minimum, that the Police Officer patrols the PHA grounds as part of his/her regular responsibilities.

*[Obtained from the FAQ's section of the 2014 Operating Subsidy page.](#)





Financial Submissions



by Claunella Richardson, FA



As the New Year approaches, the Detroit Office of Public Housing would like to take this time to remind Housing Commissions of very important upcoming financial submission deadlines. It is important that PHA's meet these deadlines, as late submissions create a compliance issue but could also be an indicator of other issues at the Commission. Timely submissions are the responsibility of the Housing Commission; therefore, it is never a good idea to utilize HUD deadlines as the vendor's due date when contracting out reporting functions. If the deadline is missed, HUD cannot and will not hold third-party vendors responsible. It is always a good idea to build in sufficient time to allow for review of the contractors work and address concerns prior to submitting to HUD. Below are important dates as it relates to financial submissions. The complete calendar can be found at [POST One Stop on HUD.GOV](#).

ITEM DUE	FYE 03/31	FYE 06/30	FYE 09/30	FYE 12/31
BOARD RESOLUTIONS APPROVING OPERATING BUDGETS DUE TO FIELD OFFICE	3/31/2014	6/30/2014	9/30/2014	12/31/2014
UNAUDITED FINANCIAL STATEMENT SUBMISSION DUE DATE EXTENSION REQUEST	5/16/2014	8/16/2014	11/15/2014	2/13/2014
UNAUDITED FINANCIAL STATEMENTS	5/31/2014	8/31/2014	11/30/2014	2/28/2014
*WAIVER OF DUE DATE FOR AUDITED FINANCIAL INFO.	12/1/2014	3/1/2014	5/31/2014	8/31/2014
AUDITED FINANCIAL STATEMENTS	12/31/2014	3/31/2014	6/30/2014	9/30/2014
REVISIONS FOR CY 2014 OPERATING SUBSIDY	6/27/2014	6/27/2014	6/27/2014	6/27/2014

**A change of the due date for audited financial statements requires a regulatory waiver. The requirements for a regulatory waiver are very specific. Please contact the Field Office as soon as the need is identified for instruc-*

SYSTEM ACCESS Changes

Updated HUD Form-27054: LOCCs Form

This is to inform you that the revised [HUD-27054 LOCCS VRS Access Authorization Form](#) dated 11/2013 is now in effect. The previous edition of this form which was dated 08/2011 is now obsolete. You may still use the previous version of the form until December 31, 2013. Any obsolete form received after this date will not be returned or processed by the Field Office. There are a few changes to the new form:

- ◆ Request Instruction - Resend User ID is allowed without notary
- ◆ Section 1: Type of Function -#9 Name Change
- ◆ Section 5c: Role -Administrative is no longer an option
- ◆ Section 9: Program Office -Allows for Field Office authorization to include contact information

Please be aware that the term 'Program Office' in this instance, is a pseudonym for the Detroit Field Office. I am your Point of Contact and I must receive, review, and authorize each required HUD-27054 prior to HQ approval.

For more detailed information regarding LOCCs and LOCCs procedures, please review [LOCCs Guidelines for Grantees](#). If you should have any question please contact me at chandra.m.broadnax@hud.gov.



by Chandra Broadnax, PA



The Bridge to Truth



There are many publically held information outlets provided by various departments within HUD as well as other agencies that provide helpful information. One of the many resources are Integrity Bulletin's from the OIG. These emailed bulletins provide helpful tips and highlights of recent OIG findings, concerns, and areas of focus for public housing and housing choice voucher programs.

The OIG recently published a integrity bulletin (Fall 2013 V1/#5) describing best practices and techniques that boards and executive directors can use in hiring public housing agency (PHA) staff, especially positions of trust (such as bookkeepers, procurement staff, or anyone else who deals with financial records or spending). While there are many aspects to hiring such as having a certain number of years of experience, possessing people skills, attaining specialized knowledge, etc., this bulletin deals with ensuring that a potential hire has integrity and trustworthiness.

The U.S. Department of Housing and Urban Development (HUD) does not review hiring by the PHAs. While PHA hiring is subject to State and local laws,

boards and executive directors have great latitude in making these decisions. While the majority of hires have not had integrity issues, there are continuing occurrences in which high level staff members in positions of trust have been fired for committing fraud or mismanagement, and were later hired by another PHA, where the abuses recurred.



The process of hiring new employees can be expensive and time-consuming, but making a bad hiring decision is even more costly. The Office of Inspector General (OIG) is currently investigating more than two dozen cases in which PHAs have hired individuals who have committed frauds or serious abuses at previous jobs. Your commission should ensure proper hiring and firing practices to prevent such investigations.

You are encouraged to subscribe to the [OIG Integrity Bulletin Updates](#) to stay abreast of best practices. Use this resource as a way to improve administration at your commission.

December 2013 Due Dates

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1 Waiver request for Audited FYE 3/31	2	3	4 VMS Reporting Open	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22 VMS Submission Due	23	24	25 Happy Holidays	26	27	28
29	30	31 Audited FYE 3/31 Due Submit Board Resolutions Approving Budget FYE 12/31 Notification of Turnover of FUP Vouchers FYE Change Due for FYE 3/31	Happy New Year			

Disclaimer: This calendar is not all conclusive and does not represent all programs and due dates. For more detail please visit HUD.GOV.



Special Thanks to our December Contributors: Anne Fiskien (Division Director), Angela Foster (PHRS), Claunella Richardson (FA), Chandra Broadnax (PA), Willie C. H. Garrett (Director)