NATIONAL AFFORDABLE HOUSING MANAGEMENT ASSOCIATION

## NAHMANEWS May June 2020 May June 2020 Company of the property of the proper

PROTECTING THE INTERESTS OF AFFORDABLE HOUSING PROPERTY MANAGERS AND OWNERS

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## Congress Considers Large Rental Assistance Bill

In mid-May the U.S. House of Representatives passed a \$3 trillion COVID-19 stimulus package called the Health and Economic Recovery Omnibus Emergency Solutions (HEROES) Act, which included \$200 billion in housing and homelessness resources. This is the fifth coronavirus relief bill to make its way through Congress.

As of press time, the HEROES bill had yet to be taken up for a vote in the Senate. As a result, NAHMA has launched a grassroots effort asking its members to reach out to their elected Senators and their staff asking Congress to fully fund rental assistance and housing programs to offset resident loss of income from the COVID-19 pandemic, including increased financial assistance for both the Department of Housing and Urban Development (HUD) and U.S. Department of Agricultural (USDA) Rural Housing Service (RHS) programs to ensure that sufficient funds are available for residents to meet their housing and utility

Current appropriations for federal rental assistance programs will not be sufficient as resident incomes are dramatically reduced or eliminated as a result of the anticipated loss of employment or lack of sufficient paid leave.

obligations, helping to alleviate financial hardships that result from economic displacement or job loss due to COVID-19. Current appropriations for federal rental assistance programs will not be sufficient as resident incomes are dramatically reduced or eliminated as a result of the anticipated loss of employment or lack of sufficient paid leave.

Specifically, NAHMA is asking its members to tell Congress to:

- Increase by 25% HUD's existing Project-Based Rental Assistance (\$2 billion), Section 202 (\$500 million), and Section 811 (\$250 million) to cover increased operating costs for staffing, personal protective equipment, services and other resources related to COVID-19 impacts
- Provide sufficient Project-Based Rental Assistance to prevent displacement for rural rental assistance programs under RHS Section 521

## What would you do with your time back?



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#### inside nahma

BY KRIS COOK, CAE



## It's Never Too Late to Become COQ Certified

THE COMMUNITIES OF OUALITY (COO) National Recognition Program is just one of the many ways NAHMA and its members are changing the perception of affordable housing. Based on a series of third-party inspections and reporting, communities certify that they meet stringent standards in physical maintenance, financial management, programs and services, employee credentials and other criteria. Even then, only the best of the best qualify to call themselves a COQ property. And, our smart badge program makes it easier for properties to promote the achievement.

Property managers or owners of affordable multifamily rental housing in the U.S. can apply for COQ National Recognition at any time during the year. Applicants must score a minimum of 225 points to receive COQ certification or 200 points for properties with 49 units or less. Properties that score more than 325 points are automatically eligible to compete in the COQ Awards competition, see page 26 for more about this year's competition.

The program, originally created through a Fannie Mae grant, sets national standards that take an objective look at what makes an excellent multifamily affordable housing community using such independent, verifiable measuring sticks as Real Estate Assessment Center scores, Department of Housing and Urban Development reports, third-party inspections, employee development and resident enrichment services.

Earning COQ recognition has many benefits, not just to the management

company responsible for the property, but for the staff and residents as well. The program also helps dispel the myths surrounding affordable housing for elected officials and the public.

Program recognition is a good marketing tool for companies, allowing them to show clients how much a management company cares about maintaining high standards, and by extension, how they will maintain their clients' properties. Additionally, it illustrates the hard work put in by the on-site personnel and volunteer boards while projecting professionalism.

The program helps residents feel more secure and even proud to be living in a community that has earned the COQ designation. Some properties hold resident celebrations, put up banners and affix the COQ logo to correspondences and other communications tools as a way to bolster that sense of pride-of-place year round. The COQ certification helps attract topnotch staff. Moreover, the recognition also creates some bragging rights.

Another benefit of the recognition program, and one of the impetuses for its creation, was to establish creditability, especially when lobbying elected officials on the importance of funding affordable housing programs. By assigning verifiable quantitative value to what makes up a quality community, NAHMA can provide affordable housing data by state, county, congressional district and ZIP code through its NAHMA Maps feature on its website. Additionally, NAHMA maintains a database of COQ properties on its site. NN

Kris Cook, CAE, is executive director of NAHMA.

#### CONGRESS CONSIDERS LARGE RENTAL ASSISTANCE BILL, continued from page 1

- Modify the RHS voucher program to provide short-term vouchers for rural families through the existing distribution platform (\$500 million)
- Modify HUD's Section 8 Housing Choice Voucher program to utilize the 2,200 state and local agencies that administer and distribute funding for 2 million families to establish and fund short-term emergency vouchers (\$40 billion)
- Provide Home Investment Partnerships Program (HOME) \$48 billion in supplemental appropriations to meet multiple short- and long-term affordable housing needs, and provide states and localities a flexible tool to address emerging housing needs related to COVID-19 impacts
- Provide Emergency Solutions Grants to ensure that homeless persons receive the rental assistance and related services needed for emergency housing beyond shelters as well as to help families and individuals that are facing homelessness (\$20 billion)
- Enact a minimum 4% housing credit rate, and lower the 50% test bond financing threshold for 4% housing credit developments
- Strengthen eviction language to specifically identify the ability of property owners to move forward with necessary evictions in the cases of criminal activity and activity that endangers the lives of other residents. This is crucial to maintaining the health and safety of rental housing communities.

In March, Congress passed the "phase three" coronavirus stimulus package, the Coronavirus Aid, Relief, and Economic Security (CARES) Act, a \$2 trillion relief package that included numerous programs and provisions to provide economic and financial relief to individuals, businesses and governments impacted by the coronavirus pandemic. The CARES Act also included several housing-specific provisions, including funding for HUD programs, an eviction moratorium, and forbearance for homeowners and multifamily properties. However, the CARES Act did not provide funding or relief for RHS pro-

grams, nor for tax credit properties.

#### **HEROES ACT**

The House-passed HEROES Act includes a second round of direct stimulus payments to individuals; an extension of the additional unemployment benefits through January 2021; \$200 billion in hazard pay for first responders and front-line workers; \$75 billion for increased coronavirus testing and \$175 billion in rent and mortgage assistance.

Specific to the affordable housing industry, the bill provides \$200 billion in housing and homelessness resources, including:

- The Emergency Rental Assistance and Rental Market Stabilization Act to provide \$100 billion in emergency rental assistance to help keep the lowest income renters housed
- A national moratorium on evictions for nearly all renters for one year
- \$11.5 billion in Emergency Solution Grants to help prevent and respond to COVID-19 outbreaks among people experiencing homelessness
- Nearly \$13 billion in additional funding for HUD and USDA housing providers, including \$1 billion in new, emergency housing vouchers

The HEROES Act includes the Emergency Rental Assistance and Rental Market Stabilization Act that was introduced by Sen. Sherrod Brown (D-OH) and Reps. Maxine Water (D-CA) and Denny Heck (D-WA) along with 135 House cosponsors and 29 Senate co-sponsors in the preceding week. The bill provides funding that could be used for short- and mediumterm rental assistance and rent-related costs, including utility payments, rent and utility arrears, arrear fees and security and utility deposits.

At least 40% of the appropriated rental assistance would have to be used to assist individuals or families experiencing or atrisk of homelessness with incomes less than 30% of area median income (AMI). At least 70% of the funding would have to be used to serve individuals or families experiencing or at-risk of homelessness earning

less than 50% of AMI. The remainder of the funds could be used to serve individuals or households earning up to 80% of AMI who are at-risk of or experiencing homelessness, with limited funding available for households earning up to 120% of AMI in some circumstances.

The proposed additional Emergency Solution Grants in the House bill provide \$11.5 billion to the \$4 billion that was provided in the CARES Act to allow shelters to provide training and hazard pay for staff; to reimburse costs related to preventing, preparing for, or responding to coronavirus impacts; and to provide hotel or motel vouchers for people experiencing homelessness.

The House-passed HEROES Act would replace the current 120-day moratorium enacted in the CARES Act for renters in federally assisted properties with a new 12-month moratorium on nonpayment evictions from substantially all rental housing. Landlords would also have to provide a 30-day notice of eviction to renters after the moratorium expires.

Under the House bill, multifamily housing property owners who receive forbearance may not charge residents late fees or penalties and may not report negative information to credit rating agencies. Renters living in these properties may not be evicted for nonpayment of rent.

The House bill provides \$4 billion for Tenant-Based Rental Assistance to help public housing agencies (PHAs) maintain normal operations and take other necessary actions to respond to coronavirus impacts. Of this amount, \$500 million could be used for administrative expenses. Additionally, \$2.5 billion would be used to adjust renewal funding for PHAs that experience a significant increase in voucher per-unit costs and would otherwise need to terminate rental assistance for families due to the lack of funds. Finally, \$1 billion would be provided for the first year funding of incremental rental voucher assistance for individuals and families experiencing homeless, at risk of homelessness, or survivors of domestic abuse.

The House bill also provides:

- \$750 million for Project-Based Rental Assistance to maintain normal operations and to take any other necessary actions during the period that the program is impacted by coronavirus.
- \$2 billion for the public housing operating fund to maintain normal operations and to take any other necessary actions to respond to the coronavirus.
- \$5 billion for Community Development Block Grants (CDBG) to cities and states. The majority of the funding would be allocated within 30 days based on the fiscal year 2020 formula, although up to \$100 million could be used for new or increased awards for existing technical assistance providers. The bill also proposes extending the three-month limitation on

using CDBG for emergency rental assistance to 121 months.

\$500 million for Section 202 Hous-

ing for the Elderly, including \$300 million for one-time grants for service coordinators, and \$200 million for Section 811 Housing for Persons with Disabilities. The proposal also includes \$100 million for housing counseling assistance.

■ \$14 million for fair housing activities, including \$4 million for the Fair Housing Organization Initiative grants and \$10 million for Education and Outreach, both through the Fair Housing Initiatives Program. The House-passed HEROES Act would authorize \$309 million for some USDA housing programs, including \$284 million for Section 521 rental assistance. The remainder (\$25 million) would provide rural housing vouchers to low-income households, including those not currently receiving rental assistance, in properties financed by Section 515 loans that were either prepaid after Sept. 30, 2005, or matured after Sept. 30, 2019. Because the bill only authorizes this funding, Congress would still need to appropriate that funding in order for communities to access it.

#### **CARES ACT**

The CARES Act, signed into law by the

president on March 27, 2020, provided some \$2 trillion in federal assistance for individuals and businesses. As for housing industry assistance, the CARES Act provided:

- Tenant-Based Rental Assistance or Housing Choice Vouchers (\$1.25 billion)
- Project-Based Rental Assistance (\$1 billion)
- Section 202 Supportive Housing for the Elderly Program (\$50 million)
- Section 811 Supportive Housing for Persons with Disabilities (\$15 million)
- CDBG (\$5 billion)
- Emergency Solutions Grants (\$4 billion)
- Public Housing Operating Fund (\$685 million)
- Native American Programs (\$300 million)

related to the COVID-19 emergency.

Forbearance of Residential Mortgage Loan Payments for Multifamily Properties with Federally Backed Loans provides up to 90 days of forbearance for multifamily borrowers with a federally backed multifamily mortgage loan who have experienced a financial hardship. Borrowers receiving forbearance may not evict or charge late fees to tenants for the duration of the forbearance period. Applicable mortgages include loans to real property designed for five or more families that are purchased, insured or assisted by Fannie Mae, Freddie Mac or HUD.

Temporary Moratorium on Eviction Filings for 120 days beginning on the

NAHMA has created a Coronavirus Information and Resources webpage to provide members with the latest updates in the rapidly changing situations concerning COVID-19.

- Native American Housing Block Grants (\$200 million)
- Indian Community Development Block Grants (\$100 million)
- Housing Opportunities for Persons With AIDS (\$65 million)
- Federal Emergency Management Agency Disaster Relief Fund (\$45 billion) while a portion of this funding could be used for housing assistance
- Coronavirus Relief Fund (\$150 billion), which operates similar to CDBG and is provided to states, Tribal governments and local governments to use for expenditures incurred due to COVID-19 impacts.

In addition to the funding provided, the CARES Act contained other key housing-related provisions on eviction moratorium, foreclosure moratorium and mortgage forbearance:

Foreclosure Moratorium and Consumer Right to Request Forbearance prohibits foreclosures on all federallybacked mortgage loans for a 60-day period beginning on March 18. Provides up to a year of forbearance for borrowers of a federally-backed mortgage loan who have experienced a financial hardship

date of enactment, landlords are prohibited from initiating legal action to recover possession of a rental unit or to charge fees, penalties or other charges to the tenant related to such nonpayment of rent where the landlord's mortgage on that property is insured, guaranteed, supplemented, protected, or assisted in any way by HUD, Fannie Mae, Freddie Mac, the rural housing voucher program, or the Violence Against Women Act of 1994.

#### OTHER NEWS AND RESOURCES

NAHMA has created a Coronavirus Information and Resources webpage to provide members with the latest updates in the rapidly changing situations concerning COVID-19. Additionally, NAHMA is emailing members as new information becomes available, and is hosting regular membership-wide conference calls to share the latest updates and provide the opportunity for membership questions and dialogue. A direct link to the coronavirus webpage is available on NAHMA's home page or by visiting www.nahma.org/coronavirus-information-and-resources/. NN



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## The Power of Member Advocacy

ADVOCACY CAN BE ONE OF THE most effective approaches in preventing breakdowns in the established gains toward greater human security. The need to advocate not only on one's own behalf, but also on behalf of those who are vulnerable or may be unable to speak up for themselves, is fundamental to NAHMA's membership.

NAHMA members are seeing their roles as advocates increasing throughout all levels of government, as they continue underscoring the need for quality affordable housing. The competing needs of the diverse populations that we serve, combined with an ever-shrinking pool of resources available to support those in need, often serve as the impetus for the initiation of NAHMA advocacy efforts. Due to the wide breadth and scope of our membership and our ability to timely share critical and sensitive information, NAHMA members have a unique understanding of the importance of needing to enhance access to critical services that impact the populations we serve. By working with federal lawmakers and agencies, we engage in facilitating upward mobility for residents by advocating for increased access to quality affordable housing and supporting related services. By advocating on behalf of their residents, NAHMA members are enhancing the capacity of those residents to address their own needs.

Very quickly I have come to appreciate how NAHMA members share an ethical commitment to serving individuals and families with low incomes. Through this commitment, NAHMA provides policy recommendations and improvements to lawmakers by leverag-

ing the wealth of substantial program experience of our members. By understanding the importance of partnerships and coalitions, NAHMA has also worked with numerous affordable housing partners and associations to enhance program funding and establish continued support of services that assist low-income communities. Based on the knowledge and unique experiences of our membership, NAHMA's ability to respond rapidly in an organized and coordinated fashion to funding or regulatory objectives has only strengthened.

With the rise of the COVID-19 pandemic, now, more than ever before, NAHMA members are relying on their unique combination of knowledge, values and ethics to take on successful advocacy roles to ensure access to affordable housing.

During my first two months with NAHMA, I witnessed how the already daunting challenge of providing quality, affordable and accessible housing in the United States has evolved into an outright emergency. With 40 million workers now unemployed in the U.S., affordable housing property owners and managers have become more increasingly aware of all their residents' uncertain financial security, and with it, their own. COVID-19 has already put millions of people at risk of being unable to pay their rent. With so many people suddenly out of work, anxiety has turned into anger and fear, with numerous tenant groups calling for a rent strike or outright rent cancellation. Since rent payments are still due at the first of the month, some cities have responded by temporarily banning all

evictions. Meanwhile state and federal lawmakers are scrambling to respond with numerous programs, policies and funding to help an already vulnerable population from becoming homeless.

Properties experiencing declines in rent still have to make their own mortgage payments, and have on-site managers, maintenance workers and other frontline staff—now considered essential workers—who still need to be paid. Many state and local governments are projecting declines in revenue, while owners are saddled with increased costs from intensive cleaning or the implementation of new safety measures due to COVID-19. How quickly a property can adapt to this changing environment will determine its success in the near and long term. Residents, owners and managers—all now have a common and linked interest to work togetherto advocate on each other's behalf. By understanding the dynamics of decisionmaking, coupled with the strategic use of advocacy, we have the ability to effect positive change and continue to improve the lives and wellbeing of the individuals and families we serve.

With Congress preparing to debate additional measures to approve emergency rental assistance, NAHMA will continue to fight for effective affordable housing policies and lead the effort to build consensus for long-term solutions to a crisis that was in progress well before COVID-19. As NAHMA's new manager of government affairs, I am honored to join this effort and I look forward to working with all of you. NN

Michal Machnowski is manager of government affairs for NAHMA.

## IRS Provides Short-Term Extensions to Certain Housing Credit, Housing Bond Deadlines Due to COVID-19

ON APRIL 10, THE INTERNAL REVENUE Service (IRS) published Notice 2020-23 providing additional relief for taxpayers affected by the coronavirus pandemic. The notice provides that taxpayers have until July 15, 2020, to perform specified time-sensitive actions due to be performed on or after April 1, 2020, and before July 15, 2020. While the notice does not specifically reference any housing credit or housing bond deadlines, it applies the July 15 deadline to all time-sensitive actions included in IRS Revenue Procedure 2018-58, which includes numerous deadlines related to these programs.

As a result of this ruling, taxpayers have until July 15, 2020, to perform any of the sensitive actions below if they were originally due to be performed on or after April 1, 2020, and before July 15, 2020.

#### **HOUSING CREDIT DEADLINES**

- 1. The 10% test requirement as referenced in Section 42(h)(1)(E) and (F)
- 2. The 24-month period in which the requisite amount of rehabilitation expenditures has to be incurred as required in Section 42(e)(3)(A)(ii)
- 3. The annual owner certification of compliance as required in regulation 1.42-5(c)(1)
- 4. The annual tenant income certification requirement in regulation 1.42-5(c)(1)(iii)
- 5. The requirement to notarize a binding agreement by the fifth day following the end of the month in which the binding agreement was made as referenced in regulation 1.42-8(a)(3)(v)
  - 6. The requirement to notarize a

binding agreement by the fifth day following the end of the month in which the tax-exempt bonds are issued as referenced in regulation 1.42-8(b) (1)(vii)

- 7. The 10-year rule for claiming credits on an existing building as required in Section 42(d)(2)(D)(i)(IV)
- 8. The minimum set-aside requirement as referenced in Section 42(g)(3)(A)
- 9. The requirement that a low-income housing commitment must be in effect as of the beginning of the year for a building to receive credit as referenced in Section 42(h)(6)(J)

## HOUSING BOND AND MORTGAGE CREDIT CERTIFICATE DEADLINES

- 10. The requirement that the issuer file an election not to issue an amount of qualified mortgage bonds if they are to instead distribute MCCs in Section 1.25-4T(c)
- 11. The requirement that an issuer provide notice to the Commissioner of the establishment of a defeasance escrow within 90 days of the date such defeasance escrow is established
- 12. The annual certification to the Secretary by operators of multifamily housing bond projects that they continue to meet the requirements of section 142(d)
- 13. The election to carry forward bond authority after the year in which the state received such authority
- 14. Requirements for making taxexempt bond yield reduction payments and rebate payments
- 15. The requirement that an issuer of a tax-exempt bond must submit to the Secretary a statement providing certain information regarding the bond not later

than the 15th day of the second calendar month after the close of the calendar quarter in which the bond is issued

Both Notice 2020-23 and housing credit disaster guidance in IRS Revenue Procedure 2014-49 provide extensions for the 10% test deadline for housing credit allocations. However, Notice 2020-23 applies only to projects that would have needed to meet their 10% test between April 1 and July 15, and only allows an extension until July 15, while Revenue Procedure 2014-49 applies to any carryover allocation in effect prior to the beginning of the major disaster declaration incident period, which is January 20, 2020, in all cases, and allows the extension of up to six months from the date of the original 10% test deadline. Moreover, Notice 2020-23 does not require implementing action by the housing credit allocating agency, while Revenue Procedure 2014-49 does. In addition, allocating agencies have the ability to offer deadline relief on a project-by-project basis or a statewide basis under Revenue Procedure 2014-49.

The other eight housing credit timesensitive actions extended by Notice 2020-23 are not addressed in IRS Revenue Procedure 2014-49. NN

James Tassos is deputy director of tax policy and strategic initiatives for the National Council of State Housing Agencies.

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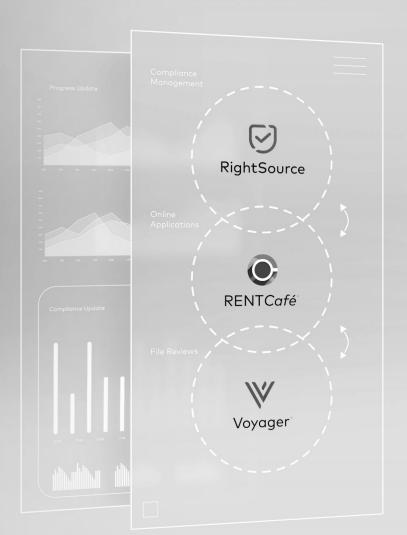
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## Carson Testifies on Budget Request, COVID Response

n March, Department of Housing and Urban Development (HUD)
Secretary Ben Carson testified at a Senate Appropriations Subcommittee on Transportation, Housing and Urban Development, and Related Agencies hearing on HUD's fiscal year (FY) 2021 budget request.

Subcommittee Chairwoman Susan Collins (R-ME) voiced strong opposition to the proposed eliminations to HUD programs, including the Community

Development Block Grants (CDBG); the HOME Investment Partnerships program (HOME); the joint HUD-Veterans Affairs Supportive Housing (VASH) voucher program; and the Public Housing Capital Fund.

In her opening remarks, Collins said, "This request reflects a significant reduction in the federal role in housing and community development. Just a few of the programs eliminated in the administration's budget request include the Community Development Block Grant Program, HOME, VASH and Family Unification Vouchers, Youth Homelessness Grants and the Public Housing Capital Fund .... The budget request once, again, includes proposals that have been rejected year after year by the subcommittee, and I predict that many of the same program eliminations and other costs shifting approaches will once, again, be rejected."

Carson defended the administration's budget request by saying it balances HUD's mission with the federal government's responsibility to be a good steward of taxpayer dollars. As for the proposed elimination of CDBG, Carson said the program can be credited for many wonderful things, but that there are many problems with the way the

program is designed. Carson said CDBG allows communities that do not need the funding to do what they want without responsibility or accountability.

The subcommittee ranking member Jack Reed (D-RI) voiced opposition to the proposed cuts. In his opening remarks, Sen. Reed said, "The administration's budget would cut HUD by an astounding \$8.5 billion from fiscal year 2020. As with the prior three budget requests, the administration walks away

The administration's FY 2021 budget requests \$47.9 billion for HUD programs, \$8.6 billion below the current FY 2020 enacted level. The cuts are achieved primarily by eliminating the Public Housing Capital Fund, HOME, CDBG, Housing Trust Fund and Choice Neighborhoods programs. These programs play a critical role in supporting the preservation of existing affordable housing and NAHMA strongly opposes their elimination.

Similar to last year, the budget pro-

In his opening remarks, Sen. Reed said, "The administration's budget would cut HUD by an astounding \$8.5 billion from fiscal year 2020. As with the prior three budget requests, the administration walks away from the federal partnership in affordable housing production and preservation with elimination of the HOME program, the CDBG program and steep cuts to public housing."

from the federal partnership in affordable housing production and preservation with elimination of the HOME program, the CDBG program and steep cuts to public housing."

Most of the hearing covered questions about HUD's response to COVID-19. The few senators in attendance asked Carson about HUD's actions to contain the virus' spread. Carson said that HUD had communicated with housing authorities/providers on "how to get in contact with the local health providers in order to make sure that they have a plan if somebody does in fact contract the virus." He also said that HUD would distribute guidance to CDBG recipients on repurposing emergency grant funding for responses to the virus and information on personal hygiene best practices.

The hearing can be viewed at https://www.appropriations.senate.gov/hearings/review-of-the-fy2021-budget-request-for-the-dept-of-housing-and-urban-development.

poses funding reductions across HUD programs, including the Housing Choice Voucher program and Public Housing.

The budget requests a small increase in funding for Project-Based Rental Assistance, Section 202 Housing for the Elderly, Section 811 Housing for Persons with Disabilities, and Family Self-Sufficiency. Similar to last year, the budget also proposes increases to HUD's Lead Remediation program and \$100 million for the Rental Assistance Demonstration program, and an additional investment to modernize HUD's information technology systems.

The budget proposes over \$18.8 billion for the Tenant-Based Rental Assistance (vouchers) program, a 21% decrease from the funding level provided in FY 2020. This deep cut is based on a change to create a new Moving to Work account, which transfers some \$4.2 billion for contract renewals from the overall voucher account. When the two accounts are combined, the FY 2021 proposal includes over \$21 billion for

voucher renewals, a 2% decrease than the FY 2020 enacted level. The budget also provides \$310 million to renew Section 811 Mainstream Vouchers and proposes to fund tenant protection vouchers at \$100 million to cover anticipated demolitions, dispositions and streamlined voluntary conversions.

The budget proposes about \$12.6 billion for Project-Based Rental Assistance (PBRA), including around \$12.4 billion to renew all expiring contracts. This PBRA request includes \$350 million for performance-based contract administrators' (PBCA) administrative fees, \$5 million more than appropriated in FY 2020. In regard to PBCAs, HUD states: "This program will use the funding from within the Housing Certificate Fund to supplement needs not provided by annual appropriations in the PBRA account. Currently, HUD estimates this need as at least \$10 million, but will access the level of funding that will ensure that regardless of the timing or outcome of new procurements, critical contract administration services will continue without interruption. Given that protests and litigation may slow the execution of new contract awards, the request considers multiple budgetary scenarios. Continued extension of the existing PBCA agreements is estimated to cost up to \$370 million in 2021. Actual cost is dependent on changes in Fair Market Rents, the number of Housing Assistance Payment contracts assigned to each PBCA, and the number of management and occupancy reviews completed. Should the Department successfully execute new awards in 2021, the request will allow for a partial year extension of existing PBCA agreements, with

remaining funds anticipated to be placed on the base-year of the new contracts."

The budget requests \$853 million for Section 202 Housing for the Elderly, an increase of \$60 million from the FY 2020 enacted levels. This includes \$641 million for contract renewals, \$100 in new Capital Advance funding and \$95 million to fund service coordinators. The budget also includes a new request of \$14 million for an extension of the Supportive Services IWISH Demonstration and to strengthen the evaluation of the demonstration. NAHMA supports this extension and will work to get it enacted.

The budget requests \$252 million for Section 811 Housing for Persons with Disabilities, an increase of \$50 million from the FY 2021 enacted levels. This also includes \$80 million for capital advance and project rental assistance. NN

Dauby O'Connor & Zaleski, LLC

# ACCOUNTANTS.

**Locations** 

Carmel, Indiana Austin, Texas

317.848.5700 info@doz.net

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## NAHMA Submits Recommendations For CRA Overhaul

AHMA provided comments to the Office of the Comptroller of the Currency's (OCC) and Federal Deposit Insurance Corporation's (FDIC) proposed updated regulation of the Community Reinvestment Act (CRA). Additionally, NAHMA, as a member of the Affordable Housing Tax Credit Coalition (AHTCC), fully supported AHTCC's recommendations to the CRA proposed rule.

According to the proposed rule summary, the proposed regulations would encourage banks to provide billions more each year in CRA-qualified lending, investment and services by modern-

izing the regulations to better achieve the law's underlying statutory purpose of encouraging banks to serve their communities by making the regulatory framework more objective, transparent, consistent and easy to understand. The proposed rule is intended to clarify which activities qualify for CRA credit, update where activities count for CRA credit, create a more transparent and objective method for measuring CRA performance, and provide for more transparent, consistent and timely CRA-related data collection, record-keeping and reporting.

#### **NAHMA'S OBJECTIONS**

NAHMA's primary concerns with the proposed rule, include:

The elimination of the separate investment test, and the shift to a ratio evaluation approach in which many more types of activities qualify for CRA credit, could make housing credit investments a much less appealing way

of meeting CRA obligations relative to other easier options—impacting pricing and production;

- The list of activities that qualify for CRA credit in the community development category is too expansive, encouraging banks to meet obligations with lower-impact investments;
- The baseline metrics lack underpinning data and may not be robust;
- Examining only balance sheets, and not originations, could allow banks to

ries which receive double weighting under the proposal—investments, loans to community development financial institutions (CDFIs), and loans to affordable housing;

- Provide further guidance on the performance context review of community development activities;
- Set community development thresholds that meet community needs:
  - Utilize bank-provided data and republish a proposed rule that out-

NAHMA joined AHTCC in urging the OCC and FDIC to consider industry recommendations, which would alter the proposed evaluation methodology, thresholds and treatment of assessment areas to ensure that housing credit investment is not subsequently decreased.

meet targets based on current balance sheet assessment and limit or halt new investment activity; and

The proposed approach to modernizing assessment areas may not address the issue of concentrations of CRA activity in areas where it is not as needed.

NAHMA joined AHTCC in urging the OCC and FDIC to consider industry recommendations, which would alter the proposed evaluation methodology, thresholds and treatment of assessment areas to ensure that housing credit investment is not subsequently decreased. The recommendations include:

- Support community development through the CRA evaluation methodology:
  - Revise the list of activities that qualify under the community development test;
  - Require a minimum level of activity in the three activity catego-

lines the methodology used to determine the community development thresholds;

- Evaluate banks' consistent support of low-income households:
  - Consider originations of loans or investments in affordable housing in addition to balance sheet activity or factor decreases in originations into the evaluation methodology;
  - Provide credit for the full amount of community development investments at the time of commitment;
- Incentivize proven community development tools where they are needed most:
  - Allow those activities which receive double weighting under the proposal—investments, loans to CDFIs, and loans to affordable housing—across a state be eligible for CRA credit if the bank has an assessment area within the state and received a satisfactory rating in the previous rating period. NN

### Professional Liability with Tax Credit Coverage

#### Habitational Risk Solutions for Affordable Housing Markets.

USI understands the importance of tax credits for affordable housing management companies to operate successfully.

Failure to comply with the Low-Income Housing Tax Credit (LIHTC) regulations can lead to recapture of previously given credits and ineligibility for future credits. USI's newly developed professional liability coverage tailored for affordable housing markets is placed through a preferred carrier and includes coverage for professional services related to the compliance with housing tax credit rules and regulations.



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## 2020 NAHMA AFFORDABLE 100

How many housing units receive at least one form of federal subsidy in the United States today? The annual NAHMA Affordable 100 list provides this important data!

#### THE NAHMA AFFORDABLE 100

comprises the largest affordable multifamily property management companies, ranked by subsidized unit counts. The NAHMA Affordable 100 list contributes vital data to the ongoing national dialogue on the future of federal funding for affordable housing. In an effort to accurately determine the portfolio of units receiving federal subsidy in the United States, NAHMA publishes this annual listing of affordable units containing at least one of the following federal subsidies:

- HUD Project-based Assistance
- Section 42 LIHTC
- HOME funds
- USDA Section 515
- Bonds

The National Affordable Housing Management Association (NAHMA) is the leading voice for affordable housing management, advocating on behalf of multifamily rental property managers and owners whose mission is to provide quality affordable housing.

NAHMA supports legislative and regulatory policy that promotes the development and preservation of decent and safe multifamily affordable housing. NAHMA serves as a vital resource for technical education and information, fosters strategic relations between government and industry, and recognizes those who exemplify the best in affordable housing.

RΔ	NK / MANAGEMENT COMPANY	HEADQUARTERS	TOTAL NUMB	ER OF UNITS
	119 rank shown in parentheses)	TIERS CORRECTED	SUBSIDIZED <sup>1</sup>	
(=0	Trank shown in parentileses,		3003101220	NESIDENTIAL
1	WinnCompanies* (1)	Boston, MA	55,100	105,214
2	FPI Management Inc. (2)	Folsom, CA	47,942	122,000
3	The Michaels Organization* (3)	Camden, NJ	45,310	54,387
4	Related Companies (4)	New York, NY	37,119	78,500
5	Dominium* (6)	Plymouth, MN	30,771	35,207
6	The John Stewart Company (7)	San Francisco, CA	30,114	33,337
7	Envolve Communities LLC (fka LEDIC			
	Realty Company LLC) (8)	Memphis, TN	26,510	33,395
8	KMG Prestige Inc. (10)	Mt. Pleasant, MI	25,116	29,694
9	Volunteers of America* (17)	Alexandria, VA	25,000	25,000
10	Mercy Housing Management Group* (12)	Denver, CO	23,933	23,933
11	Millennia Housing Management	255., 65	20,700	20,700
12	Ltd.* (11)	Cleveland, OH	22,691	30,515
12	Edgewood Management Corporation* (9)	Gaithersburg, MD	22,398	26,345
13	Alpha Barnes Real Estate Services (19)	Dallas, TX	22,319	29,308
	Capstone Real Estate Services Inc. (14)	Austin, TX	22,201	33,745
	National Church Residences* (13)	Columbus, OH	21,992	22,045
	MMS Group* (15)	New York, NY	21,121	38,180
17	• • •	Cleveland, OH	20,000	40,000
	ConAm Management Corporation* (18)	San Diego, CA	19,126	50,246
19		Panama City, FL	18,611	19,323
	McCormack Baron Management Inc. (5)	St. Louis, MO	18,435	22,224
21	<b>3</b>	Tacoma, WA	15,565	16,081
22		Tampa, FL	14,615	15,415
23	1 ,	Brooklyn, NY	14,581	17,523
	Pinnacle Property Management (16)	Addison, TX	14,069	169,000
	Capital Realty Group Inc.* (28)	Spring Valley, NY	14,029	14,029
26		Houston, TX	14,000	23,000
27	1 1 1	Long Beach, CA	13,880	18,088
28	•	Hollywood, FL	13,607	13,786
29	Herman & Kittle Properties Inc. (29)	Indianapolis, IN	13,501	15,556
30	Conifer Realty LLC (31)	Rochester, NY	13,365	15,341
31	Independent Management Services (37)	Fenton, MI	13,304	13,304
32		Carmel, IN	13,275	16,745
33		Indianapolis, IN	13,256	19,747
34	Boyd Management (33)	Columbia, SC	12,999	12,999
35	Gateway Management			
	Company LLC (51)	Birmingham, AL	12,926	13,768
36	• • • • • • • • • • • • • • • • • • •	Rockville, MD	12,583	13,322
37		Chicago, IL	12,226	22,897
38	Wilhoit Properties (35)	Springfield, MO	12,146	12,930
39	• •	Boston, MA	12,026	17,473
40	Preservation of Affordable Housing (POAH) (48)	Boston, MA	12,014	12,134
41	UAH-Mayfair Management Group (39)	Dallas, TX	11,635	30,000
42		Columbus, OH	11,629	11,698
43	Maco Management Co. Inc. (38)	Malden, MO	11,562	11,654
44	The Hallmark Companies Inc. (53)	Atlanta, GA	11,502	13,226
45	Lincoln Property Company (44)	Dallas, TX	11,500	191,669
46	NDC Asset Management (45)	Pittsburgh, PA	11,345	11,457
47	SPM LLC* (41)	Birmingham, AL	11,183	17,709
48	Hayes Gibson Property Services LLC	Bloomington, IN	11,078	12,979
49	SHP Management Corp.* (78)	Cumberland Foreside, ME	11,000	11,000

RANK / MANAGEMENT COMPANY	HEADQUARTERS	TOTAL NUMBER OF UNIT	
(2019 rank shown in parentheses)		SUBSIDIZED <sup>1</sup>	RESIDENTIAL
EQ. Double Discount Management (EQ)	Curanahana NC	10 471	10 F70
50 Partnership Property Management* (52)	Greensboro, NC	10,471	10,570
51 USA Properties Fund Inc. (47)	Roseville, CA	10,466	11,031
52 Preservation Management Inc.* (77)	South Portland, ME	10,041	10,164
53 Barker Management Inc. (54)	Anaheim, CA	10,000	10,000
54 Peabody Properties Inc.* (49)	Braintree, MA	9,980	13,614
55 Reliant Realty Services LLC* (34)	New York, NY	9,956	9,956
56 Winterwood Incorporated* (55)	Lexington, KY	9,876	10,460
57 United Apartment Group (56)	San Antonio, TX	9,771	36,043
58 Maloney Properties Inc.* (63)	Wellesley, MA	9,698	10,595
59 Aperto Property Management (85)	Irvine, CA	9,616	11,380
60 Pennrose (86) 61 Fairfield Residential (116)	Philadelphia, PA	9,602	10,366
	San Diego, CA	<b>9,427</b> 9,349	35,486
	Columbia, MO	•	9,529
63 Continental Management (58)	Bingham Farms, MI	9,306	9,798 25.000
64 Picerne Real Estate Group (60) 65 AWI Management Corp. (68)	Phoenix, AZ <b>Auburn, CA</b>	9,205 <b>9,022</b>	9,022
	Nashville, TN	9,022	26,814
3 1 , 3 , ,	Newton, MA		1
67 Wingate Companies* (62) 68 Residential One LLC* (81)	Columbia, MD	8,989 <b>8,939</b>	14,000 <b>9,209</b>
69 Yarco Company Inc. (61)		8,831	9,542
	Kansas City, MO Omaha, NE	8,802	16,390
<b>70 Seldin Company* (72)</b> 71 EAH Housing (67)	San Rafael, CA	8,679	8,679
72 Habitat America LLC* (83)	Annapolis, MD	8,581	8,913
73 Eden Housing (65)	Hayward, CA	8,526	8,526
73 Eden Housing (63) 74 MidPen Housing (92)	Foster City, CA	8,500	8,500
75 Vesta Corporation* (95)	Weatogue, CT	8,467	9,356
76 J & A Inc. (71)	Corinth, MS	8,390	8,390
77 Community Realty Management* (89)	Pleasantville, NJ	8,315	8,539
78 National Community Renaissance* (73)	Rancho Cucamonga, CA	8,292	8,292
79 Solari Enterprises Inc.* (82)	Orange, CA	8,262	8,305
80 TRG Management Company LLP (74)	Weston, FL	8,259	20,000
81 The Community Builders Inc.* (79)	Boston, MA	8,188	8,928
82 Community Management	boston, wa	0,100	0,720
Corporation (64)	Winston-Salem, NC	8,126	8,166
83 Intermark Management* (98)	Columbia, SC	8,089	10,151
84 American Apartment Management			
Co. Inc. (69)	Knoxville, TN	8,060	8,312
85 RLJ Management Co. Inc. (84)	Columbus, OH	7,974	8,225
86 Rose Community Management LLC (80)	Independence, OH	7,902	9,206
87 BSR Real Estate Investment Trust (88)	Little Rock, AR	7,400	9,600
88 LHP Capital* (90)	Knoxville, TN	7,359	7,359
89 Evergreen Real Estate Group (91)	Chicago, IL	7,333	8,000
90 Greystar (93)	Charleston, SC	7,191	451,180
91 HallKeen Management* (94)	Norwood, MA	7,162	8,830
92 Silver Tree Residential LLC (109)	Memphis, TN	7,000	7,000
93 RY Management Co. Inc. (99)	New York, NY	6,750	9,000
94 Monroe Group Ltd.* (108)	Denver, CO	6,659	6,659
95 Trinity Management LLC* (101)	Boston, MA	6,639	7,386
96 Wallick Company* (46)	Columbus, OH	6,576	13,208
97 Housing Management Resources Inc.* (97)	North Quir av MA	4 E10	4 040
98 Peak Living (102)	North Quincy, MA Pleasant Grove, UT	<b>6,519</b> 6,481	<b>6,849</b> 15,925
99 Capreit Inc. (103)	Rockville, MD	6,434	40,000
100 CSI Support & Development* (106)	Warren, MI	6,339	6,339
100 C31 Support & Development (100)	TTAITEII, IVII	0,337	0,339

Companies in bold provided data for NAHMA's survey. All others are based on industry estimates.

- \* A NAHMA Communities of Quality National Recognition Program Participant
- <sup>1</sup> and <sup>2</sup> All unit data represent only units directly managed (not owned) that were rented or available to rent on Dec. 31, 2019. Down units, abated units, units under construction or rehabbing units not available for rent are not included.
- 1 Total affordable units managed. Federal programs only, including HUD, LIHTC, USDA, HOME, and Bond programs. Data do not include state or local subsidy, public housing, tenant-based vouchers (Section 8 or RD tenant-protection vouchers), or federal mortgage insurance or loan guarantee programs. If a unit has more than one subsidy, it is counted only once.
- <sup>2</sup> Total residential units managed (including market or affordable).

NAHMA would like to extend its sincere thanks to the NAHMA Affordable 100 Task Force, without whose hard work and support this survey would not be possible. In particular, sincere appreciation goes to task force chair Mike Coco, Choice Property Resources Inc. and vice chair Amber Day, TrashPro; Evelyn Arias, Real-Page Inc.; Boone Atkins, Yardi; John Broderick, US Housing Consultants; Eric Cole, Converged Services Inc.; Dori Garmeiser, Hessel Aluise & O'Leary PC; Mike Jhagroo, Converged Services Inc.; Jennifer Kelly, MRI Software; Greg Proctor, RealPage Inc.; Jeffrey Promnitz, Zeffert & Associates, Inc.; and John Yang, Rental-HousingDeals.com Inc.

If you believe your company should be included in next year's survey, please contact Jennifer Jones, jjones@nahma.org.

## HUD Responds to FAST Act Comments

n early December 2015 the Fixing America's Surface Transportation (FAST) Act was signed into law. The act contained language that allowed public housing authorities (PHAs) and owners/agents (O/As) to conduct full income recertification for families with 90% or more of their income from fixed income every three years instead of annually. In December 2017, HUD issued an interim rule to align the current regulatory flexibilities with those provided in the FAST Act. The interim rule also sought to extend some of the streamlining changes that were proposed for and made only to the housing choice

voucher (HCV) and public housing programs to other certain multifamily housing programs.

The final rule implements the December 2017 FAST Act interim rule, with one change that clarifies owners are not required to make adjustments to nonfixed income.

A May NAHMAnalysis highlights NAHMA member comments to the December 2017 Interim rule and HUD's responses to the comments. It can be found in the Members Only section of nahma.org.

## NAHMA COMMENTS AND HUD RESPONSES

Utility Reimbursements (§ 5.632) NAHMA said its members support the streamlining changes; however, additional clarification was needed on what policies owner/agents should adopt to assist residents that might experience a financial hardship under the rule. For example, if a resident is getting a utility reimbursement, it means they have very limited or no income at all, and as a result it is difficult to project what would

trigger or constitute a financial hardship. NAHMA asked if HUD analyzed or calculated the amounts at which residents may claim a financial hardship.

According to HUD, hardship policies for utility reimbursements will be addressed through program-specific guidance.

NAHMA also requested clarification on the statement, "the PRACs that HUD would be open to amending the assistance contracts of owners ...," asking how HUD planned to do this.

HUD's response stated, the provisions of the rule do not affect the regulation and program guidance governing the requirements of adjusting utility allowances.

incomes that are made up of at least 90% fixed income. The FAST Act did not require PHAs and owners to verify nonfixed income amounts in years where no fixed-income review is required, but did require them to use third-party documentation for a full income recertification every three years.

Additionally, the interim rule and the final rule both reflect the FAST Act by allowing PHAs and owners to use cost-of-living adjustments for fixed sources if such sources make up at least 90% of a resident's income. HUD made a slight adjustment in the regulatory text in the final rule to clarify the language to emphasize that

The final rule implements the December 2017 FAST Act interim rule, with one change that clarifies owners are not required to make adjustments to nonfixed income.

PHAs and owners must perform utility allowance adjustments in accordance with established guidance, according to HUD.

## Streamlined Certification of Fixed Income (§§ 5.233, 5.657, 960.257, and 982.516)

NAHMA said members support the streamlining changes to fixed income; however, clarification was needed regarding when O/As can and cannot choose to verify nonfixed income, and whether O/As always have to verify nonfixed income regardless of the percentage of the income that is fixed.

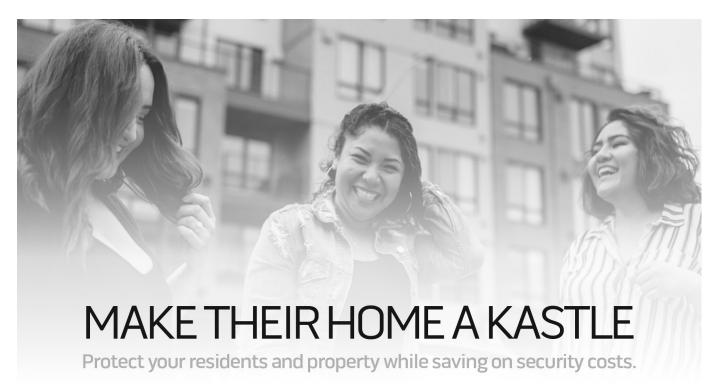
HUD responded that Section 78001 of the FAST Act amended the United States Housing Act of 1937 to allow PHAs and owners in the HCV, public housing and PBRA programs to eliminate annual income reviews in some years by applying a cost-of-living adjustment determined by the secretary to fixed income sources for families with

PHAs and owners are not required to make adjustments for nonfixed income in such instances when using streamlined income determinations.

According to HUD, the rule does not alleviate the responsibility to conduct reexaminations each year, but rather changes the standards for income verification during those reexaminations, which encompass more actions than income verifications. For example, reexaminations consider verifications of expenses related to deductions, verifications of family composition, compliance with the Community Service and Self Sufficiency requirement in the public housing program, etc.

When it comes to triennial certifications, NAHMA asked HUD to provide clarification on the terminology "every three years." For example, a resident moves in Jan. 1, 2018, and an O/A does a complete verification of the resi-

continued on page 20



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## Three Great Books!

#### Green Housing: A Practical Guide to Green Real Estate Management

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**NAHMA** 

dent's income, including asset income. NAHMA asked does every three years mean that the next time the O/A would need to complete a verification is Jan. 1, 2020, which is actually two years but it is the third year of their tenancy, or does it mean Jan. 1, 2021, which is three years after Jan. 1, 2018? NAHMA recommended providing examples in the rule or subsequent guidance.

According to HUD, the provisions of the rule are discretionary. Owners that choose to implement streamlined annual recertifications must use thirdparty verification of income at move in for new residents and for existing residents at the first annual recertification after the rule becomes effective. Streamlined methods of verification of income may be applied to the annual recertification the year after thirdparty verified certification in year two and the next annual recertification in vear three. Third-party verification of income must be used for the following annual certification in year four. HUD will not provide a common use form at this time.

NAHMA said it was concerned that the interim rule does not address how to treat medical expenses for residents that are on fixed incomes. For example, some residents claim medical expenses to help lower their rent. NAHMA asked if O/As should do full recertifications for residents with medical expense claims, but then do streamlined recertifications on residents that do not claim medical expenses (i.e., who only have income plus assets)?

According to HUD, the FAST Act and the interim rule provide administrative relief to PHAs and owners. PHAs and owners may elect a streamlined income determination for families on a fixed income. However, the provision only pertains to the verification of sources of income. PHAs and owners must continue to conduct third-party verification of deductions, including medical expenses deductions.

HUD proposed a rule to implement income changes made by Housing Opportunity Through Modernization Act of 2016 (HOTMA), including medical expense deductions, published on Sept. 17, 2019. HUD said it does not perceive a conflict between the FAST Act and HOTMA.

NAHMA also asked how will the streamlining provisions be implemented with Tenant Rental Assistance Certification System (TRACS)? Will software packages know what to do if O/As do or do not choose to do streamlined recertifications? In particular, NAHMA said, there needed to be some type of structure in place so that Management Occupancy Reviews are conducted with consistency across the portfolio.

HUD said the provisions in the rule can be handled by the current iteration of TRACS. Although streamlining certifications is permitted by owners, form HUD-50059 is still required to be completed by owners and signed by residents and submitted to TRACS. HUD will consider changes to TRACS that may make tracking streamlined years easier.

## Family Declaration of Assets Under \$5,000 (§ 5.659)

NAHMA said its members are very supportive of this provision; however, members often have difficulty getting information back from banks, and as a result, gathering six consecutive bank statements would not be easy. In addition, a question arises as to whether O/As would need to use the asset income the resident states they are receiving on the declaration, similar to the tax credit program.

HUD responded that for move ins and annual recertifications initiating the three-year streamlining cycle, PHAs and O/As must adhere to current program guidance. For years two and three, the rule requires households to complete a declaration of assets of \$5,000 or less. NN

## HUD Issues Several RAD Updates

here have been several Rental Assistance Demonstration (RAD) updates issued by the Department of Housing and Urban Development (HUD) since February. Below is a rundown.

#### **COVID-19 AND RAD**

Public Housing Authorities (PHAs) and owners should follow the latest Centers for Disease Control and Prevention (CDC), state or local health department guidance. HUD posted a number of frequently asked questions (FAQs) available on HUD's coronavirus webpage, including information on resident meetings and other approaches to informing and engaging with residents; processing of Financing Plans through the RAD Resource Desk; conducting closings; and managing potential delays in the completion of construction or timing of relocation. Forthcoming FAQs will provide additional details related to on-site inspections conducted as part of a Capital Needs Assessment or Environmental Review.

## RAD IMPROVEMENTS AND EXPANSION PROPOSED FOR THE FY 2021 BUDGET

In February, the administration released the fiscal year (FY) 2021 budget which contains some important proposed legislative changes that would improve RAD's impact and expand RAD to new programs.

#### **Public Housing Conversion**

- Eliminating the cap on the number of public housing units that could be converted through RAD without additional subsidy, currently 455,000 units, and eliminating the deadline for applications for RAD, currently Sept. 30, 2024. Eliminating the cap and deadline would allow PHAs to plan their recapitalization strategies more effectively, and preserve much needed affordable housing
- Providing \$100 million to supplement the contract rent levels for properties that are unable to convert based on

contract rents constructed from public housing appropriated levels

- Ensuring residents can retain access to critical support services, by expanding eligibility for the Family Self Sufficiency and Jobs Plus programs for residents or properties assisted under Project-Based Voucher (PBV) or Project-Based Rental Assistance (PBRA)
- Authorizing PHAs that use Section 18 in conjunction with RAD (i.e., RAD/Section 18 Blends) to convert the Section 18 units to a PBRA contract, in lieu of awarding tenant protection vouchers assistance. Currently, the vouchers awarded following a Section 18 approval can only be used to support a PBV contract. This new option will simplify administration by HUD, PHAs and owners

#### 202 PRAC Conversions

■ Ensuring the continuation of resident services when 202 Project Rental Assistance Contracts (PRACs) convert under RAD by exempting PRAC costs associated with services and service coordinator salaries from the statutory cap on initial PBRA contract rents. Initial PBRA contract rents, which conventionally only apply to shelter rents, are currently capped at 120% of the Fair Market Rent

#### **New Programs**

The budget would also expand RAD by authorizing the conversion of two additional assistance contracts:

Section 811 PRACs: Much like 202 PRACs, the 30,000 units assisted through Section 811 PRACs are an aging stock with growing capital needs, but with limited access to private and public financing. Allowing these units to utilize RAD will enable owners to recapitalize these assets on the Sec-

tion 8 platform. These properties also experience unique challenges as owners satisfy community integration mandates and supportive service program requirements, all of which will be maintained through the RAD conversion process Section 202 SPRACs: Senior Preservation Rental Assistance Contracts (SPRACs) were authorized in 2010 as a preservation solution for affordable senior properties that were refinancing their pre-1974 Section 202 direct loans and needed a long-term rental assistance contract. However, with limited funding from Congress and alternative preservation solutions identified by HUD, the stock is unlikely to grow much beyond the 1,450 supported by SPRACs today. The proposed change will utilize RAD to consolidate the SPRACs, which, by statute, already operate very similarly to PBRA, onto the Section 8 platform

#### NEW TRAINING AVAILABLE FOR PHAS ON RAD, SECTION 8 AND STREAMLINED VOLUNTARY CONVERSION

HUD posted new training videos on Asset Repositioning that outline the HUD tools available to PHAs to transition their inventories to the Section 8 platform and illustrate through a fully developed case study how those tools can be used. The trainings include Asset Repositioning for Small PHAs and Asset Repositioning for Medium and Large PHAs.

## UPDATED RAD/SECTION 18 BLEND FAQS NOW AVAILABLE

HUD posted updated FAQs related to the blending of RAD and Section 18, a creative approach for a PHA to secure more revenue to preserve and recapitalize public housing properties: RAD/Section 18 "75/25 Blend" and RAD/Section 18 "Closeout Blend."

continued on page 22

HUD ISSUES SEVERAL RAD UPDATES, continued from page 21

## RAD ENVIRONMENTAL REVIEW GUIDANCE

HUD published a revised guide on "Environmental Review Requirement for RAD Conversions." The update provides improved guidance to all property types converting under RAD and implements the strengthened environmental requirements introduced in Revision 4 of the RAD notice, including:

- Housing authorities and owners must test for radon prior to converting and, if found, must mitigate any health hazards
- Additional instruction is provided for a streamlined environmental review for conversions without any rehabilitation
- Use of the HUD Environmental Review Online System for "Part 50" Environmental Reviews is required to reduce the time it takes for HUD to complete environmental reviews for PBRA and Federal Housing Administration insured conversions so that transactions can proceed more expeditiously

HUD stated that the improvements make RAD easier to use, while ensuring that properties converted through RAD are safe for residents and free of environmental hazards.

## TRACKING RESIDENT RELOCATION THROUGH A RESIDENT LOG

In order to monitor and track relocation and residents' right of return for public housing conversions under RAD, a PHA or project owner is required to maintain a resident log that tracks residents from the time of the first resident meetings through the completion of any rehabilitation or construction. HUD posted a form of a resident log that PHAs may use to ensure they are tracking all of the data points needed to satisfy HUD's monitoring requirements. PHAs and owners are encouraged to use this or any other form with at least this minimum level of information. NN

## OIG: Oversight of PBRA Inadequate

he Department of Housing and Urban Development (HUD)
Office of Inspector General
(OIG) recently released the final results of its review of the Section 8
Project-Based Rental Assistance (PBRA) program in HUD's Southwest Region.
The report concluded HUD did not have adequate oversight to ensure that its payments to subsidized property owners were accurate and supported when it suspended contract administrator reviews.

In 2016, the OIG began a series of audits to review HUD's multifamily housing programs. In addition, OIG reviewed HUD's controls to ensure that its housing

contract administrators to verify housing assistance payment subsidies. Furthermore the report said, HUD's contract amendment process created instability in the contract administrator's operations. HUD did not adequately implement replacement procedures or its own on-site monitoring to reduce the deterioration and mismanagement risks to the properties it subsidized, the report concluded.

"This lack of monitoring resulted in owners' not meeting contract requirements and incurring more than \$5.6 million in questioned costs. When HUD reinstated the reviews, contract administrators faced many compliance issues

The objective, according to the report, was to determine whether HUD had adequate oversight of its PBRA program in the Southwest Region during the five years in which it suspended its project-based contract administrators' management and occupancy reviews. According to the report, over the five-year period that was audited, HUD paid subsidies to property owners for nonexistent and unsupported residents based on falsified, inaccurate and unverified information.

assistance payment subsidies were based on accurate and supported information. The objective, according to the report, was to determine whether HUD had adequate oversight of its PBRA program in the Southwest Region during the five years in which it suspended its project-based contract administrators' management and occupancy reviews.

According to the report, over the five-year period that was audited, HUD paid subsidies to property owners for nonexistent and unsupported residents based on falsified, inaccurate and unverified information.

The report said that when HUD suspended the reviews of the assisted properties, it removed a major tool used by the resulting from the lack of on-site monitoring for five years," read the report.

OIG recommended that the Office of Multifamily Housing Programs:

- 1. Enforce its written policies and procedures to ensure that the verification and payment of housing assistance payment subsidies for properties it subsidizes are based on accurate and supported information;
- 2. Establish and implement policies to ensure effective contract administration, including providing project-based contract administrator contract amendments in a timely manner; and
- 3. Develop contingency policies and procedures to ensure that the properties it subsidizes receive adequate and verifiable continuous monitoring. **NN**

## Memberships: Buy Some, Get Some

We want to thank you for your participation in NAHMA by offering additional memberships for FREE. With the purchase of additional executive-level memberships at existing discount rates, you'll receive at least one or more FREE Associate memberships to get more of your staff participating in NAHMA.

	BUY EXECUTIVE-LEVEL MEMBERSHIPS	=	GET FREE ASSOCIATE MEMBERSHIPS	
OVER 20,000 UNITS	5	+	4	
6,000–20,000 UNITS	4	+	3	
UNDER 6,000 UNITS	2	+	1	

JOIN US IN 2020! Help us be an even stronger voice for quality affordable housing.



## NELLS Allows Property Managers Realize Leadership Potential

AHMA, in cooperation with Brenda Harrington, founder of Adaptive Leadership Strategies LLC, is offering a fully virtual program that combines small group learning with one-to-one coaching called the NAHMA Emerging Leaders Learning Series (NELLS), beginning Aug. 6. It is designed to accelerate professional growth for the next generation of leaders in the affordable housing industry. Register for the program through the NAHMA Online Store at nahma.org.

The NELLS program is intended to help affordable housing property managers realize their leadership potential while developing the skills necessary



Find more information about NELLS or to register, click on the link on the nahma.org home page. The program is limited to a maximum of 15 participants and the deadline to register is July 7.

for success in an ever-changing business environment. The program is limited to a maximum of 15 participants and the deadline to register is July 7.

The series will be delivered using three group sessions and two one-to-one coaching sessions, all of which will be conducted using Zoom video conferencing software. Each session is designed to be interactive, engaging participants in discussions, questions and answers. Zoom software is free of charge to participants and is activated with a simple and quick download; a smartphone, tablet or computer with a camera and microphone is required.

Each NELLS group session will address a leadership-related topic relevant to day-to-day business and operational challenges. Topics will be discussed based on three foundational pillars: managing yourself, managing others and managing the business.

The first group session, Cultivating

a Management Mindset, Aug. 6, from 2-4:15 p.m. EDT, includes a program orientation. The second session is Communicating Effectively as Managers and Leaders, and takes place Aug. 27, from 2-3:30 p.m. EDT. The final session, Achieving Important Goals, is Sept. 17, from 2-3:30 p.m. EDT. The two 60-minute one-to-one coaching sessions will be scheduled individually with participants between Aug. 6-Sept. 17.

A key component of adult learning is to be able to apply new knowledge in context. The one-to-one coaching sessions enable each participant to apply content discussed during group sessions to his/her specific work environment and circumstances.

Although there are no formal assignments, NELLS participants are expected to begin applying what they learn during group and one-to-one sessions, then be willing to speak in

#### Scholarship Program Assisting Students During This Difficult Time

"THE NAHMA EDUCATIONAL FOUNDATION is resolved to make 2020 a meaningful year for applicants to the scholarship program. It is our belief that economy and the lives of countless individuals. Finding money to pay for school may prove to be very difficult for many of our residents. NAHMA scholarship their educational goals," said Alice Fletcher, chairperson of the NAHMA Educational Foundation, during a recent foundation meeting.

In 2019, 109 scholarships were awarded for a total of \$272,500, which brings the grand total to just more than \$1,686,700 awarded over the life of the program.

these scholarship funds may be more valuable to recipients this year than in any other year in the 14-year history of the program. The coronavirus pandemic is having a huge impact on our

funds could be the difference between going to school and not going to school in the fall for some residents. We want to be sure we assist as many residents as we can as they pursue The NAHMA Scholarship Committee will meet in June to select the scholarship recipients. The 2020 NAHMA scholars will be selected from a pool that includes over 300 applications filed. The NAHMA Educational Foundation is committed to making financially impactful awards to the outstanding student/residents that are chosen. As a result, each scholarship awarded will be worth \$2,500. This will be the seventh consecutive year of scholarships being awarded at that level.

The foundation has received applications from 25 different states, the District of Columbia and the U.S. Virgin Islands. Thirteen different AHMAs are represented in that total. In 2019, 109 scholarships

general terms about the impact of what they learn during subsequent sessions.

Class size is limited to five to 15 participants, and registration is on a first-come, first-served basis. Tuition is \$1,250 per person; full payment of tuition must be received by NAHMA by July 7.

Brenda Harrington, PCC, is a Certified Executive Coach and former property management executive. The founder of Adaptive Leadership Strategies LLC, she works with leaders in private, public, nonprofit, government, intergovernmental and international humanitarian aid organizations to develop the competencies required for them to have impact as leaders in the 21st century. Harrington is also a moderator for Harvard Business School Publishing (HBP), where she has facilitated leadership development courses for HBP corporate clients worldwide. NN

were awarded for a total of \$272,500, which brings the grand total to just more than \$1,686,700 awarded over the life of the program. NAHMA scholars attend a wide variety of community colleges, universities and trade/technical schools. They represent a very broad range of backgrounds and ages from high school seniors to senior citizens.

The 2020 class of NAHMA scholars will be announced this summer.

The complete list of recipients will be released in an upcoming edition of NAHMA News. Watch this space for the list of outstanding students from various apartment communities, management companies and AHMAs across the country! NN

#### **Lifting Voices to Spread Love**

JUDGING FOR THE 2020 AHMA ART AND POSTER CONTEST has wrapped and the winners are being notified they will appear in the popular 2021 NAHMA Drug-Free Kids calendar. The underlying message for the annual contest is always a drug-free theme but the association wanted to open the door for more avenues of expression, so a subtheme is incorporated into the poster contest. The subtheme for this year is My Voice Will Be Heard: Speaking the Language of Love.

Due to the uncertainties and disruptions created by the coronavirus pandemic, electronic copies of the poster entries were due to NAHMA June 15, after first being submitted to a local AHMA for consideration. The original winning artwork was then sent to NAHMA and will appear in NAHMA's annual calendar, which has sold out every year since 2014.

The poster and art contest invites children, seniors and adults with special needs living in affordable multifamily housing to create artwork and compete for prizes.

Typically, the contest draws more than 5,000 participants nationwide. Through the annual auction of the winning poster entries, the contest generates significant contributions to the NAHMA Educational Foundation's scholarship program and is a key source of support for NAHMA foundation scholars.

"This is one of the most popular contests NAHMA holds each year," Kris Cook, CAE, NAHMA executive director, said. "Everyone looks forward to seeing the fantastic artwork produced by the talented residents. The auction is always a fun time and supports a great program."



The poster contest is open to children and elderly residents 55 years or older who live in a community of a NAHMA or a local AHMA member company, as well as residents with special needs who live in a permanent supportive housing community or Section 811 community of a NAHMA or a local AHMA member company.

The poster contest is open to children and elderly residents 55 years or older

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For each grade category for children, as well as the elderly and special needs levels, local AHMAs selected up to three winning posters, which can consist of photographs, websites, computer art or other media.

The grade categories for children are based on the grade the contestants have completed by June 2020: kindergarten-first grade, second-third grade, fourth-sixth grade, seventh-ninth grade and 10th-12th grade.

All AHMA winning submissions were then forwarded to NAHMA electronically, where a distinguished panel of judges selected the 13 winning entries. The winning original artwork was then sent to NAHMA for reproduction for the 2021 calendar. One special entry is selected as the grand prizewinner, which will appear on the cover. Only children are eligible for the top prize.

The winners of each local contest receive various prizes from their AHMA.

The national contest's grand prizewinner, in addition to appearing on the cover of the 2021 calendar, receives a \$2,500 educational scholarship and a trip to Washington, D.C., where the artist will be honored at a future NAHMA event.

Each national winner of the NAHMA contest—regardless of entry category—receives a \$1,000 educational scholarship from the NAHMA Educational Foundation. All winners are also featured in the 2021 calendar.

Furthermore, participants in the annual art contests held by the local AHMAs are eligible to be selected as Regional AHMA Art Contest Honorable Mentions. Those selected for this distinction are featured in a special section of the NAHMA 2020 Drug-Free Kids calendar and receive a \$100 scholarship check.

All art submitted to NAHMA becomes the property of the association and NAHMA has the right to use the art for publicity, publications and advertisements.

For complete rules or to see a list of past winners, visit http://www.nahma.org/awards-contests/calendar-contest/.

The NAHMA 2021 Drug-Free Kids calendar will go on sale in September. NN

## Time to Start Preparing COQ Awards Applications

hile in self-isolation why not use the time to enter the NAHMA 2020 Communities of Quality (COQ) Awards competition? The submission deadline to NAHMA is Nov. 5.

to developing outstanding properties for families of modest means. NAHMA believes it is essential that outstanding affordable properties—and the individuals who maintain them—be publicly recognized for providing quality housing that offers a safe, healthy envi-

"They are communities supplying essential programs and services for

their residents. These awards bring valuable well-deserved attention

Outstanding Turnaround of a Troubled Property

Award winners will be notified in early January 2021 and will receive their awards in a special ceremony at the NAHMA Biannual Top Issues in Affordable Housing Winter Conference,

To enter the awards competition, a property must first apply for and achieve national recognition as a NAHMA Community of Quality with a minimum score of 325

points on its National Recognition application. The deadline for submitting an application to a local AHMA for consideration in the national program is Sept. 3.

"The Communities of Quality Awards honor the achievements of affordable housing providers who make an unprecedented contribution



An overview of the COQ program, the national recognition program and the awards' detailed application information and submission materials are available at the NAHMA website at http://www.nahma.org/awards-contests/communities-of-quality/.

ronment," Timothy Zaleski, SHCM, NAHP-e, NAHMA president, said. "They are communities supplying essential programs and services for their residents. These awards bring valuable well-deserved attention to the important work we are all doing."

to the important work we are all doing."

The awards competition has five categories:

- Exemplary Family Development
- Exemplary Development for the Elderly
- Exemplary Development for Residents with Special Needs
- Exemplary Development for Single Room Occupancy Housing

March 10-12, 2021, in Washington, D.C.

This year's COQ Awards program is jointly sponsored by HD Supply Multifamily Solutions, a leading supplier of maintenance and renovation products to the multihousing industry, and Mohawk Industries, a leading global manufacturer that creates products to enhance residential and commercial spaces around the world.

An overview of the COQ program, along with the awards' detailed application information and submission materials are available at the NAHMA website at http://www.nahma.org/awards-contests/communities-of-quality/.

The AHMAs will also be honoring their local NAHMA Communities of Quality program participants. Please check your local AHMA's program details; a directory of the AHMAs is available on the NAHMA website, at http://www.nahma.org/membership/ahma-directory/.

For more information about the COQ program and awards, contact Paulette Washington at 703-683-8630, ext. 110 or pwashington@nahma.org.

NAHMA looks forward to judging numerous applications in every category from every AHMA. The time to start preparing applications is now. **NN** 

#### **About the COQ Awards Sponsors**

ABOUT HD SUPPLY MULTIFAMILY SOLUTIONS: With 150,000-plus items and free, next-day delivery on most items to most areas, HD Supply Multifamily Solutions is your source for maintenance supplies, fabrication, installation, and renovation services. Our 700-plus account representatives serve more than 130 markets, providing personalized service backed by the strength of a national company. To order call 1-800-431-3000 or at hdsupplysolutions.com.

ABOUT MOHAWK INDUSTRIES: Mohawk Industries is a leading global manufacturer that creates products to enhance residential and commercial spaces around the world. Mohawk's vertically integrated manufacturing and distribution processes provide competitive advantages in the production of carpet, ceramic, laminate, wood and luxury vinyl flooring. Our industry-leading innovation has yielded products and technologies that differentiate our brands in the marketplace and satisfy all remodeling and new construction requirements. Our clients put trust in Mohawk brands because they are synonymous with quality, longevity and innovation.

## Data and Research that Support Affordable Housing

HUD User is the source for affordable housing research, reports, and data from the U.S. Department of Housing and Urban Development's Office of Policy Development and Research (PD&R). Visit **HUDUser.gov** to explore the various resources available on HUD User, including Income Limits and Fair Market Rents for assisted housing units.

To find out about the latest affordable housing data and research releases from PD&R, subscribe to receive email updates and check out *The Edge*, PD&R's online magazine.







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#### REGULATORY WRAP-UP

#### **HUD NEWS**

HUD'S OFFICE OF MULTIFAMILY HOUS-ING REISSUED THE UPDATE ON BUDGET BASED RENT ADJUSTMENT for Properties Assisted under Project Rental Assistance Contracts (PRACs) memo with a correction to paragraph 5 in May. The original correspondence dated March 12, referenced monthly per-unit deposit levels rather than annual per-unit deposit levels, as was intended.

EQUAL OPPORTUNITY HELD THE WEB-BASED NATIONAL FAIR HOUSING TRAINING DAY ON SEXUAL HARASS-MENT PREVENTION in Housing in April. The training event increases knowledge of sexual and other forms of harass-ment in housing, how to prevent it from occurring and how to address it when it happens. The free web-based, interactive, and self-paced training module is available on the Preventing Sexual and Other Discriminatory Harassment in Housing webpage on HUD Exchange. Educational tools about sexual harass-

ment and other forms of discriminatory harassment are also available on HUD Exchange for local education and outreach efforts. To access the training, create a free HUD Exchange account and complete the short questionnaire. Existing HUD Exchange account holders can log into their HUD Exchange Learn accounts to take the training. The training is available 24/7 and open to anyone interested in learning more about sexual harassment in housing.

HUD'S OFFICE OF MULTIFAMILY HOUS-ING PROGRAMS IS CONTINUING TO WORK ON THE NEXT RELEASE OF THE CAPITAL NEEDS ASSESSMENT (CNA) E-TOOL. Available Aug. 24, CNA e-Tool version 3.0 will provide additional features and enhanced functionality for users, making it easier to work remotely for today's challenging environment. The new version of the tool will include:

I Enhanced data entry functionality, which will allow users to more quickly and efficiently input and use data points, revise data, and resubmit data

Personal user dashboards, which will

allow users to quickly access snapshot data of their CNA submissions and their status; and

Program-specific workflows, so that users will have a more precise submission process based on the information required for a specific FHA insurance and other programs.

Check the CNA e-tool webpage for updates and information.

**HUD PUBLISHED A HOUSING NOTICE** FOR DELEGATED PROCESSING FOR **CERTAIN CAPITAL ADVANCE PROJ-**ECTS. The notice aligns with HUD's most recent Section 202 and 811 Capital Advance Notices of Funding Availability, addresses workload concerns, and aligns capital advance with Low-**Income Housing Tax Credit timelines.** Specifically, this is an update to H 2013-12. The updated notice streamlines the firm commitment process by mandating a timely issuance within 12 months. The delegation to state and local agencies will streamline the compliance process for sponsors undertaking mixedfinance transactions—capital advance

#### WADE: NEXT ASSISTANT SECRETARY FOR HOUSING AND COMMISSIONER OF FHA

The Trump administration has nominated Dana Wade to become the next assistant secretary for housing and commissioner of the Federal Housing Administration (FHA). Wade previously served as the acting federal housing commissioner and assistant secretary for housing from July 2017 to June 2018, and also worked in the Trump administration as program associate director for general government at the Office of Management and Budget from December 2018 to December 2019. Earlier in her career, she held senior staff posi-

tions in Congress, serving as the deputy staff director for the Senate Banking Committee and as the Republican deputy staff director for the Senate Appropriations Committee under Sen. Richard Shelby (R-AL). If confirmed by the Senate, Wade would replace Brian Montgomery as FHA commissioner. Montgomery was confirmed as deputy secretary of the Department of Housing and Urban Development (HUD) in May. The Senate Banking Committee has yet to announce when a vote will be held on the nomination for Wade.

TO READ THE NOTICES below in their entirety, visit the issuing agency's webpage under the Agencies tab at nahma.org. For all updates related to the COVID-19 coronavirus, visit the Coronavirus Information and Resources webpage at https://www.nahma.org/ coronavirus-information-and-resources/.

in combination with other funding sources.

**HUD RELEASED THE FISCAL YEAR** (FY) 2020 ESTIMATED MEDIAN FAM-**ILY INCOMES (MFIS) AND THE FY 2020 INCOME LIMITS**, which became effective April 1. MFIs are used as the basis for income limits in several HUD programs, including the public housing, Section 8 project-based, Section 8 housing choice voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD also released the FY 2020 Multifamily Tax Subsidy Project Income Limits, which are used to determine eligibility for Low-Income Housing Tax Credit and tax-exempt bond properties. Visit the FY 2020 Income Limits page on HUD User to access the data and documentation.

#### **LIHTC NEWS**

#### THE REPORT, UNDERSTANDING WHOM THE LIHTC SERVES: DATA ON TEN-ANTS IN LIHTC UNITS AS OF DECEMBER

21, 2017, provides demographic data about housing credit tenants, including race, ethnicity, family composition, age, income, use of rental assistance, disability status, and monthly rent burden, as required by the Housing and Economic Recovery Act of 2008. HUD typically publishes this report annually; however, publication last year—which would have covered data through the end of 2016—was delayed due to the government shutdown in early 2019. HUD decided to wait until 2020 to publish the report, which covers both 2016 and 2017 tenant data submissions from state housing credit agencies. Read the report by visiting https://www.ncsha.org/ resource/hud-%c7%80-understandingwhom-the-lihtc-serves-data-on-tenants-in-lihtc-units-as-of-december31-2017/?utm\_source=NCSHA&utm\_ campaign=af499861f4-EMAIL\_ CAMPAIGN\_2019\_02\_06\_09\_58\_ COPY 01&utm medium=email&utm term=0\_f00bc192e4-af499861f4 -65495351.

#### THE INTERNAL REVENUE SERVICE **RELEASED REVENUE RULING 2020-09,**

which provides various prescribed rates for federal income tax purposes, including applicable federal interest rates, adjusted applicable federal interest rates and adjusted long-term and tax-exempt rates for June 2020. As provided in the ruling, Table 4 contains Low-Income Housing Tax Credit (LIHTC) Appropriate Percentages Under Section 42(b)(1) for June 2020. The appropriate percentage for the 70% present value low-income housing credit is 7.16%; and the appropriate percentage for the 30% present value low-income housing credit is 3.07%. Under section 42(b)(2), the applicable percentage for non-federally subsidized new buildings placed in service after July 30, 2008, shall not be less than 9%.

#### **USDA NEWS**

IN MAY, THE U.S. DEPARTMENT OF AGRICULTURE (USDA) RURAL DEVEL-**OPMENT'S OFFICE OF MULTI-FAM-**ILY HOUSING HAS PUBLISHED A LIST OF FREQUENTLY ASKED QUESTIONS (FAQS) designed for residents in Section 514 and Section 515 housing, titled Multi-Family Housing Tenants: Frequently Asked Questions. The FAQs are also available in Spanish. The Office of Multi-Family Housing encourages property owners and management agents of Section 514 and Section 515 properties to distribute these FAQs to tenants electronically when possible, as well as post in common areas. NN

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- National Accredited Housing Maintenance Supervisor™ (NAHMSTM)
- Credential for Green Property Management<sup>TM</sup> (CGPM<sup>TM)</sup>

For moreinformation, visit www. NAHMA.org and click on Education.

## NAHMA



## Finding a New Passion

MICHELLE HAWLEY WAS ATTENDING the University of Washington when she accepted a part-time position as a property manager to help with the bills. Once she graduated with her political science degree she thought to herself, what now? She found the answer in the affordable housing industry.

"I had an opportunity to be a junior property manager and didn't know what to do with my degree," Hawley said. "I originally thought I might be an attorney, but the drive and passion wasn't there. I loved college, but wasn't sure where that would take me."

In July, Hawley will celebrate 19 years with Bellwether Housing where she started as a portfolio manager and now serves as the director of property management.

As the director, she oversees the non-profit's day-to-day portfolio operations and compliance for 33 buildings. Bell-wether has more than 800 new units in the development pipeline and is readying for rapid growth in the next five years. She is also part of the company's leadership strategic planning team.

"The work is really interesting. No one day is the same," Hawley said. "I'm going to work every day and what we're doing is a benefit for the larger community."

Hawley said providing affordable housing to those in need can is very rewarding, but in Seattle, where Bellwether is located, it has also become a necessity.

"Seattle has a growing gap of people who need affordable housing," she said. "I work for a mission-driven organization fulfilling a public need. The people I work with in the industry are really great."

Due to the local growth, the employment market is very tight. She said it

is a challenge to recruit people into the industry. When she does, Hawley enjoys mentoring and helping colleagues continue their professional growth.

"In February, we were at 100% for all of our positions.

That's the first time, in a long time that has happened," Hawley said. "We are always looking for someone with a passion for the mission; we can train for the work."

Hawley is in the first year of a twoyear term as president of the AHMA of Washington, prior to that, she was vice president for two years.

"When I joined the board, I helped to create a Board of Directors guide to onboard new members. It has all the information a new member needed to step into a director role," she said. "Last year, after the board elections, we had our first away retreat. We focused on strategic



planning and relationship building. It really set up the board for a successful first year. We have really ambitious plans for education and membership that are driven by committee work."

Due to the COVID-19 pandemic, the AHMA had to cancel its annual conference, which

Hawley said was a "total bummer." But it is looking at ways it can partner with sister organizations to continue to do advocacy, as well as ways to provide educational opportunities in the future.

"We have to think about what the current crisis means for our strategic plan," she said.

She is also proud that AHMA of Washington was named NAHMA's AHMA of the Year for 2019 in the small AHMA category. **NN** 

Jennifer Jones is manager of communications and public relations for NAHMA.

#### **Welcome New Members**

NAHMA welcomes the following new members as of May 12, 2020.

#### **EXECUTIVE**

Sylvia Blanco, Housing Authority of the City of Austin/Pathways Asset Management, Austin, TX

Bob Cuttle, Vesta Corporation, Weatogue, CT

Ann Gass, Housing Authority of the City of Austin/Pathways Asset Management, Austin, TX

Michael Gerber, Housing Authority of the City of Austin/Pathways Asset Management, Austin, TX Nancy McIlhaney, Housing Authority of the City of Austin/Pathways Asset Management, Austin, TX

Michael Roth, Housing Authority of the City of Austin/Pathways Asset Management, Austin, TX

#### **ASSOCIATE**

Mollie Kickbush, Pinnacle, Maitland, FL

#### E D U C A T I O N C A L E N D A R

For information on specific classes, contact the AHMA or organization directly. All dates and locations are subject to change. For the most up-to-date listings, visit the NAHMA Education & Event Calendar at http://www.nahma.org/education/education-event-calendar/.

**EDITOR'S NOTE**: Due to the evolving health recommendations due to the COVID-19 coronavirus, please contact the AHMA directly for the most up-to-date status of all in-person and virtual events and educational offerings.

#### JULY

#### 7-8

### Fair Housing Compliance (FHC) Certification

Virtual Training SAHMA 800-745-4088 www.sahma.org.org

#### 7-10

### Tax Credit Compliance Course with Exam Options

Glen Allen, VA Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### 8

### Conflict Resolution: Dealing with Difficult People

Webinar AHMA-NCH 833-246-2624 https://ahma-nch.org

### EIV: Policies, Procedures, and Reporting

Webinar AHHMA-PSW 866-698-2462 www.ahma-psw.org

#### 9

#### VAWA and the Emergency Transfer Plan

Webinar SAHMA 800-745-4088 www.sahma.org.org

## Basic HUD Occupancy: Virtual Training

Webinar SAHMA 800-745-4088 www.sahma.org.org

#### 14

### Interviewing Applicants for Move-In for HUD & Tax Credit

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### 14

#### Managing the LIHTC Utility

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### Safety Planning: Minimizing Impacts to Operations Webinar

Webinar SAHMA 800-745-4088 www.sahma.org.org

#### 15\_17

## Conquering HOME Multifamily Compliance

Salem, OR Oregon AHMA 503-357-7140 www.oregonaffordable housingmanagement.com

#### 16

#### SHCM Exam Prep: Program Requirements

Webinar SAHMA 800-745-4088 www.sahma.org.org

#### 22

## It's About Ethics: Creating and Maintaining Personal/Professional Boundaries

Webinar AHMA-NCH 833-246-2624 https://ahma-nch.org

### How to Prepare for a MOR or Audit

Webinar AHHMA-PSW 866-698-2462 www.ahma-psw.org

#### 22

#### **Understanding HOME**

Webinar SAHMA 800-745-4088 www.sahma.org.org

#### 22-23

#### LIHTC/SHCM

Indianapolis, IN MAHMA 614-481-6940 http://mahma.com

#### 23

#### **Integrated Pest Management**

Webinar SAHMA 800-745-4088 www.sahma.org.org

#### 29

#### Interviewing Applicants for Move-In for HUD & Tax Credit

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### **AUGUST**

#### 5

#### Understanding 202/811 PRACs

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### 11

#### RAD

Webinar MAHMA 614-481-6940 http://mahma.com

#### 12

#### Compassion Fatigue: Work Life Balance to Avoid Burnout

Webinar AHMA-NCH 833-246-2624 https://ahma-nch.org

#### 18

## The Challenges of Managing Combined Funding Properties

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### 26

#### Aging Gracefully: Overview of Aging Process

Webinar AHMA-NCH 833-246-2624 https://ahma-nch.org

#### 26-28

#### Conquering LIHTC Compliance

Salem, OR Oregon AHMA 503-357-7140 www.oregonaffordable housingmanagement.com

#### Tax Credit Class with SHCM Exam

Helena, MT Rocky AHMA 303-840-9803 www.rockyahma.com

#### **SEPTEMBER**

#### 9

#### **Understanding HOME**

Webinar Mid-Atlantic AHMA 804-564-7898 https://mid-atlanticahma.org

#### 9

#### LIHTC/SHCM

Detroit, MI MAHMA 614-481-6940 http://mahma.com

### Grant Writing 101: Show Me the Money

Webinar AHMA-NCH 833-246-2624 https://ahma-nch.org

#### 10

## File Management & Documentation for Affordable Housing

Webinar Mid-Atlantic AHMA 804-564-7898 http://mid-atlanticahma.org

#### 23

#### Fair Housing

Webinar Mid-Atlantic AHMA 804-564-7898 http://mid-atlanticahma.org

## **NAHMAN**ews

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PROTECTING THE INTERESTS OF AFFORDABLE HOUSING PROPERTY MANAGERS AND OWNERS

### thelastword

## A Continuing Commitment

AS NAHMA PRESIDENT, I HAVE engaged with various AHMAs, members and colleagues. One thing I have noticed is that we all have one thing in common: a fierce commitment to the industry and to getting the very best we can for our employees and our residents. That commitment has only become more evident

leaders change, all leading us to work hard to keep up.

And, keep up we will. That is NAH-MA's commitment to you. We want you to know you can count on us to bring you the latest and most meaningful news about what is happening on Capitol Hill and in the halls of HUD, Treasury, the

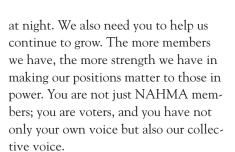
We need you, not just to keep doing what you are doing wherever you are, but to stay engaged with NAHMA so that we know what keeps you awake at night.

as we work through a new normal consisting of Zoom meetings, social distancing and stay-at-home orders created by a global pandemic.

While working from home or maintaining social distance may make it feel like the world has come to a standstill, the ever-changing COVID-19 recommendations show that the one thing that is constant is change. The same is true for the affordable housing industry—regulations change, the economy changes, local and national government

IRS and other agencies as it pertains to COVID-19, fiscal year 2021 and a number of housing regulations, just to name a few. You can also count on us to continue to provide opportunities for your own professional development and education, so that you can be ever more productive and confident about what you do.

We need you, not just to keep doing what you are doing wherever you are, but to stay engaged with NAHMA so that we know what keeps you awake



As you can read in this and every issue of NAHMA News, we face constant challenges to the way things are going, even when they are going really well. The fiscal year 2021 debates are already underway and they have important ramifications to all of our funding programs. Be sure to let your colleagues in the industry who are not NAHMA members know why it is important that they join now.

Finally, thank you for your continued support of NAHMA and the numerous initiatives we are working on to advance the industry and ultimately improve the quality of life for the families we serve. **NN** 

Timothy Zaleski, SHCM, NAHP-e, is president of McCormack Baron Management Inc. and president of NAHMA.