

REFERENCE	COMMENTS	
Chapter 2 Eligibility for Assistance	Page 2-27	<i>After 2-31 F.1. a-</i> We recommend adding the following: “see also Figure 3.5 on determining project eligibility and Figure 3-6 for varied definitions of eligible disabilities by program type.”
Chapter 3 Income Limits	Page 3-6	<i>Section 3-6 D 3:</i> Please clarify that the correct title for the “Section 236 income limits” is “Income Limits for Section 236, Section 221(d)(3), and Section 235 programs”
Citizenship	Page 3-24	Paragraph 3-12 K.2 – How is this paragraph to be interpreted relative to move-ins in the year 2005 – there should be no deferrals for move-ins, only for those residents who have been receiving assistance since June 1995 (see also Exhibits 3-8 and 3-10)
Chapter 3 DHS Documentation	Page 3-26	<i>Example DHS Verification:</i> Please add a second example to illustrate what would occur if secondary verification revealed that other family members were not eligible, thus causing their rent to be increased. Is the increase in rent effective 30 days hence, or is it retroactive to the move-in date? What happens if the family cannot pay the increase? It would benefit readers to show an example of how complicated situations should be addressed.
Chapter 3 Student Eligibility	Page 3-37	<p><i>Paragraph 3-16A-1:</i> It is unclear whether HUD will accept a “separate and distinct” household two weeks or even one day prior to the application date. Please clarify what time period would be acceptable.</p> <p><i>Paragraph 3-16 B:</i> What is meant by “household types”? Please also clarify if the requirements of this paragraph apply to minors who are not head of household.</p> <p><i>Paragraph 3-16 B-2:</i> This section appears to say that if the student has a disability or meets the Department of Education’s definition of an independent student, the student is not required to establish a separate</p>

	<p>Page 3-70</p> <p>Page 3-105</p>	<p>residence and can be claimed as a dependent by his parents. Is that correct? If not, please clarify.</p> <p><i>Paragraph 3-33 A-2:</i> Federal Tax Returns are filed after the calendar year ends so it is entirely possible that a student will not be claimed by his parents as a dependent in the current year, but could have been claimed as a dependent on the previous year's tax return. Is it HUD's intention that a fully independent student household would be required to wait a full year to be eligible? (see also Paragraph 3-16 A-3 page 3-37).</p> <p><i>Exhibit 3-15:</i> We recommend changing the title of this form to: "Parent or Guardian Certification of Independent Status and Financial Assistance Provided." In addition, we request a companion form be provided for students to use for their certification, titled "Student Certification of Anticipated Financial Assistance."</p>
<p>Chapter 4 Tenant Selection Plan</p>	<p>Page 4-4</p>	<p><i>Exhibit 4-2:</i> Eligibility of college students should be added in the "recommended topics" section with regard to the tenant selection plan.</p>
<p>Waiting List</p>	<p>Page 4-36</p>	<p><i>Paragraph 4-16 C-1 b:</i> Is HUD requiring that notification of unit availability be in writing as this is not currently a requirement and could delay lease-up. Further, the phrasing is unclear as to timing of notification. We assume that the owner is required to notify a family on the waiting list at such time a unit may become available and not make some projection at the time the family is placed on the waiting list. We recommend adding the word "subsequently" after the words "waiting list for the property and"</p>
<p>Chapter 5 Form 50059- Confined Member of Household</p>	<p>Page 5-9</p>	<p><i>Paragraph 5-6 C-2:</i> Please clarify that signatures of "confined" family members are NOT required on the 50059.</p>

Joint comments of AAHSA, CARH, IREM, NAR, NAHMA, NLHA, NAHB
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Treatment of Assets	Page 5-34	<i>Paragraph 5-7 G-2 b2:</i> As with the other changes in the handbook, please allow at least 4 months from the date of publication for the changes to take effect to allow sufficient training of on-site staff.
Medical Expenses	Page 5-43	<i>Paragraph 5-10 D-6:</i> For sake of clarification, please state that this type of expense is not applicable for a move-in.
Verification	Page 5-52 Page 5-54	<i>Paragraph 5-13, C.1b:</i> Please provide great clarity on how owners and agents should determine whether a third party verification is not possible as opposed to delayed. An example may be an immigrant that owns a property in another country that can not be documented. <i>Paragraph 5-13, C-3b:</i> Regarding the ability of acceptance of pay stubs, please clarify how employment income should be documented for recent hires.
TTP Calculation	Page 5-69	<i>Paragraph 5-28 B:</i> TTP is \$92.50 in this example and should be rounded up to \$93.
	Page 5-77	<i>Paragraph 5-31 F:</i> The existing requirement for all signatures should be modified to provide an exception for extenuating circumstances – like a head or spouse who has been deployed to Iraq. Owner/agent should be able to note in the file why signature was not obtained.
Medical Expense Deduction	Page 5-91	<i>Exhibit 5-3:</i> Language regarding specificity of “licensure/certification within the locality where practicing” places an undue new burden on the owner/operator regarding verification of licensure status of medical professionals providing information on behalf of their patient/client. Please eliminate this language or provide acceptable language in the model 3 rd party verification documents requiring signers to meet this standard, leaving burden of meeting obligation on the person who signs document, with “under penalty of perjury” clauses to support it. Also, under “personal supplies” the word should be “incontinence” not incontinent.
Chapter 6 Lease	Page 6-48	<i>Exhibit 6-2:</i> Addendum should be rewritten to reflect all required program language in HUD model leases (reference Section 6-5 F2). Also the exhibit does not include disabilities in the non-discrimination section.

<p>Chapter 7 Annual Recert Req.</p>	<p>Page 7-4</p>	<p><i>Paragraph 7-4 D:</i> This section is inconsistent with paragraph 3-6 E-3. We recommend that language read "only adult children moving in at time of initial occupancy are to be considered as part of the family and their income counted. Adult children moving in to a Section 202/8 project after initial occupancy may only be allowed if they are essential for the care or well-being of the elderly tenant(s), shall be considered "live-in aides" (not added to the lease), their income should be excluded and they should be required to sign a release form relinquishing any future rights to the unit, etc."</p>
<p>Chapter 9 Form 52670</p>	<p>Page 9-16</p>	<p><i>Paragraph 9-12 B-2:</i> This section deals with an electronic copy of the form HUD 52670 but references an original signature. We assume this is an error and suggest HUD remove the words "bearing an original signature" as an electronic version would not have an original signature (this should also apply to Interim Recerts and Initial Certification forms).</p>
<p>Special Claims</p>	<p>Page 9-22</p>	<p><i>Paragraph 9-15 A-6:</i> For the sake of clarification, please add the words "or initial certification" before the words "move-in"</p>
<p>Excess Income</p>	<p>Page 9-33</p>	<p><i>Paragraph 9-15 A:</i> Please remove the word "unassisted" before the words "basic rent." Excess income is rent collected above the Section 236 Basic rent not "unassisted" basic rent. Basic rent is assisted by virtue of the interest subsidy.</p>

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