





CGI

THE NEWS AND INFORMATION QUARTERLY FOR OWNERS AND AGENTS OF THE PERFORMANCE BASED CONTRACT ADMINISTRATION FOR NEW YORK STATE

The CA Quarterly Review

Welcome to the Summer edition of the CA quarterly newsletter. Its purpose is to provide useful information regarding compliance and HUD policy changes as well as provide recent HUD news.

If you are not already receiving this publication via e-mail, or if you have ideas, suggestions or questions for future publications, we'd like to hear from you. Please visit: www.pbcany.com to submit comments.

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HUD Notice 20-07 Coronavirus Aid, Relief, and Economic Security (CARES) Act Eviction Moratorium

On July 1, 2020, <u>HUD posted Notice H 20-07</u>, <u>Coronavirus Aid</u>, <u>Relief</u>, <u>and Economic Security (CARES) Act Eviction Moratorium</u>. The notice provides a summary of the CARES Act signed into law on March 27, 2020, and extends the moratorium on evictions for all HUD-insured or HUD-held mortgages while under forbearance. Additionally it outlines guidance on tenant protections for multifamily properties not subject to forbearance and those with HUD-assisted units.

Background

The CARES Act prohibits an Owner/Agent from filing for possession of a unit during the eviction moratorium solely for the purpose of any non-payment of any rent, fee, or charge for renters at HUD multifamily assisted or FHA-insured properties during the national emergency until July 24, 2020. Projects are also unable to charge fees, penalties, or other charges to the tenant related to the nonpayment of rent. The CARES Act does not include evictions that were filed before the moratorium was started or after it ends; or in cases where the eviction is based on reasons other than non-payment of rent.

Tenant Protections During Multifamily Forbearance

Owners/Borrowers that received or will receive forbearance under the CARES Act remain subject to the eviction moratorium and renter protection provisions until both the moratorium and the borrower's forbearance periods have expired. During the forbearance period, the borrower must inform all residents of the prohibition against eviction solely for the non-payment of rent. Borrowers can negotiate and obtain additional forbearance relief beyond the 90-day period provided by the CARES Act with HUD approval. To protect residents, tenant protections are extended during any forbearance period or the full duration of the 120-day moratorium. Owners/borrower's cannot: (1) require a tenant to vacate a dwelling unit located in or on the applicable property before the date that is 30 days after the date on which the owner/borrower provides the tenant with a notice to vacate solely for nonpayment of rent or other fees or charges or charge any late fees, penalties, or other charges to a tenant for late payment of rent, and; (2) issue a notice to vacate under paragraph (1) until after the expiration of the forbearance. Additionally, the owner/borrower must allow a tenant that missed rent payments during the borrower's forbearance period to make up such missed rent payments over a reasonable time as determined in the sole discretion of the borrower. However, the owner/borrower must not require the missed rent payment be repaid in one lump sum at the end of the forbearance period. The borrower must not charge tenant late fees or penalties due to late or missed rent payments.

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HUD Notice 20-07 Coronavirus Aid, Relief, and Economic Security (CARES) Act Eviction Moratorium (Cont.)

Tenant Protections for Mortgaged Properties Not Subject to Forbearance

HUD is concerned about the termination of the eviction moratorium in Section 4024 of the CARES Act. While the extension of the eviction protections provided to tenants residing in properties under forbearance will assist some renters, many tenants in properties with FHA-insured and HUD-held mortgages not under forbearance, who have experienced income loss, will not be similarly protected. Therefore, HUD is encouraging all owners of properties with FHA insured and HUD held mortgages (and Section 202/Section 811 financing) to work with tenants to avoid evictions. Measures include rent repayment plans, delayed evictions, or other measures to avoid measures during these difficult times. Owner/borrowers are also encouraged to check with state and local jurisdictions that may have local moratoria on evictions.

Tenant Protections for Assisted Housing Units

The CARES Act provides funding to assist in supporting various needs of project-based Section 8, Section 202 and Section 811 programs. Some of those funds have been designated for increased rental subsidy to cover tenant loss of income during the COVID19 emergency. Tenants in those program types have the option to request an interim recertification (IR) to reflect the loss of income, thus minimizing the impact of a loss caused by the COVID-19 emergency. The purpose of the allocated CARES Act funds is to cover the difference in reduced tenant rental payments to the property. HUD encourages tenants that receive housing assistance to inform their landlord and/or management agent of losses of income and request an IR. HUD is encouraging owners to inform tenants of their ability to request an IR in the event of reduced or lost income. Tenants receiving housing assistance that experienced extenuating circumstances that prevented a timely recertification that resulted in an increase in tenant payment (when permitted by state/local laws) may owe the landlord/owner rent for months that have passed. HUD encourages owners to work with tenants on a repayment agreement for past due rental payments.

Tenants and management agents will find helpful information, including contact information for assistance for subsidized tenants, in the Addressing Tenant Concerns During the COVID-19 National Emergency brochure.

Multifamily project owners and management agents will find helpful information related to the eviction moratorium and resources for impacted tenants in the Promoting Housing Stability During the COVID-19 National Emergency brochure.





HUD Multifamily Resources: COVID-19

HUD Multifamily Resources: COVID-19

COVID-19 Guidance for Residents

HUD has posted a brochure, <u>Addressing Tenant Concerns During the COVID-19 National Emergency</u>, which owner/agents may find beneficial to have available for residents as it provides helpful information on rent requirements, suspension of evictions solely for the non-payment of rent, as well as Contract Administrator resident contact numbers.

COVID-19 Guidance for Owner/Agents

HUD has posted the <u>Promoting Housing Stability During the COVID-19 National Emergency</u> brochure. It provides helpful information for Multifamily Property Owners and Management Agents on the eviction moratorium details and resources that are available to assist impacted residents.

Multifamily Q&A for COVID-19

Additionally HUD has been maintaining an <u>FAQ</u> document related to the COVID 19 pandemic as it relates to the impact on Multifamily Housing. The highlighted questions below represent only a small portion of the updated FAQ guidance that has been disseminated, and is a continuation of an <u>article</u> we posted last quarter. Owners and management agent staff are encouraged to periodically check the <u>HUD FAQ link</u> directly to determine if there have been any updates.

General Multifamily Housing

Q.5: How should a HUD-assisted property owner/agent message to residents, staff, volunteers, and visitors when there is a positive COVID-19 case among their community?

A.5: Residents are not required to notify administrators if they have or may have a positive case of COVID-19. However, if you do receive information of a positive case, in coordination with <u>local health officials</u>, communicate the possible COVID-19 exposure to all residents and workers, volunteers, and visitors. This can be done by placing signage in common areas and entrances/exits and by letter to all residents, delivered to their doors. Messages should attempt to counter potential <u>stigma and discrimination</u>. Residents could be advised to inform their recent personal visitors of potential exposure. Owners and agents must maintain confidentiality as required by the Americans with Disabilities Act (ADA) and the Privacy Act. Owners and agents may provide notification of positive COVID-19 cases, but they must ensure the notification does not disclose any names, apartment numbers, and other personally identifiable information to residents, workers, volunteers, and visitors. Owners and agents should also consult local and state health and privacy laws before making any disclosure. CDC COVID-19 <u>printable materials</u> for community-based settings are available on the CDC website.

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HUD Multifamily Resources: COVID-19 (cont.)

Q.14: What resources are available to address food insecurity concerns for residents of HUD-assisted Multifamily properties during the National Emergency?

A.14: HUD encourages tenants, property owners and agents to explore all local, state, and federal resources to assist residents with access to food, especially vulnerable residents living in HUD assisted housing. A list of potential sources can be found on the HUD Exchange at https://www.hudexchange.info/resource/6026/food-resources-for-residents-of-multifamily-properties/. A key resource to connect older adults and their caregivers to meals and other community-based services is the U.S. Administration on Aging's Eldercare Locator at 800-677-1116 or eldercare.acl.gov. In addition, the Eldercare Locator can help people with disabilities find their local Aging and Disability Resource Center. People with disabilities can also locate their local Center for Independent Living at https://www.ilru.org/projects/cil-net/cil-center-and-association-directory. Households who recently experienced a loss of income or who have a very low income can check with their state human services agency about food benefits under the USDA Food and Nutrition Service's Supplemental Nutrition Assistance Program (SNAP). Households with children who previously received free or reduced-cost school meals should contact their school, school district, or state education department about food benefits for children. HUD also has a site where households can find nearby food pantries based on their location: https://www.hud.gov/findshelter/foodpantries

Q.15: Are internet services an allowable expense for properties receiving HUD project-based rental assistance?

A. 15: HUD encourages property owners and agents to make their properties internet-ready, including through participation in the <u>Neighborhood Networks Program</u>. Similar to telephone service, broadband or internet fees for individual units may not be included in tenant rent charges or utility allowances for properties receiving project-based rental assistance; however, low-income tenants may be eligible for low-cost internet services. Interested owners and tenants should contact local internet service providers or visit https://connecthomeusa.org/ for more information.

CARES Act and Additional Resources Available for Response

Q.5: Are household stimulus payment under the CARES Act reportable as tenant income?

A.5: The Economic Impact Payment (which is technically an advance payment of a tax credit that may be claimed on a 2020 tax return) and the temporary weekly federal enhancement to unemployment insurance provided by the CARES Act are not to be included in calculations of income. However, HUD notes that regular payments of unemployment insurance (issued by the state) are treated as income, as is customary under program rules.

Q.15: Does the ban on evictions apply to all tenants or only those tenants whose employment has been affected by the COVID-19 National Emergency? For example, what if an owner or agent has tenants on a fixed income who are choosing not to pay rent based on the recent announcement?

A.15: Effective March 27, 2020, the CARES Act requires that property owners cease starting new actions against tenants of covered dwellings for 120 days on both FHA-insured Multifamily properties and Multifamily -assisted properties. Further, they must waive late payment fees and charges during this time for nonpayment of rent. Therefore, the temporary moratorium on evictions for nonpayment of rent, as well as a moratorium on charging fees and penalties related to nonpayment of rent apply regardless if employment was directly or indirectly linked to COVID-19.

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HUD Multifamily Resources: COVID-19

Q.16: With the eviction moratorium, should owners and agents still send late notices to residents, or should they wait until the 120-day moratorium is over?

A.16: The CARES Act does not prohibit a reminder notice of the late rent being sent by owners or agents. The reminder notice cannot be a notice to vacate. The reminder notice must not include fees/charges/penalties for the nonpayment of rent.

Q.17: Can an owner or agent still evict a perpetrator of domestic violence or criminal activity, or for other lease violations?

A.17: Yes. The eviction moratorium found in Section 4024(b) of the CARES Act only applies to evictions related to non-payment of rent or non-payment of other charges. The moratorium also prohibits the charging of other fees, penalties, or other charges due to the non-payment of rent. Protections under the Violence Against Women Reauthorization Act of 2013 (P.L. 113-4) remain in effect, and owners/agents should consult Housing Notice 2017-05 for more information about the housing rights of victims of domestic violence, dating violence, sexual assault, and stalking under VAWA.

Asset Management

Q.5: An Owner's Rent Comparability Study (RCS) has triggered the need for a HUD third-party RCS. How will this be addressed?

A.5: Performance Based Contract Administrators (PBCA) and HUD staff will continue to review owners' previously submitted RCSs pursuant to guidance in Chapter 9 of the <u>Section 8 Renewal Guide</u>. If field staff is unable to procure third-party RCSs due to the COVID-19 pandemic, HUD will develop an alternative mechanism to respond to the owners' RCS submissions.

Q.7: A Section 8 HAP owner/agent's Fifth year rent adjustment is coming up, at which time the property's rents would be adjusted up or down to align with the Rent Comparability Study (RCS) market rents. How should these rents be processed if the RCS cannot be obtained?

A.7: Under Option One, Option Two, and Option Five contained in HUD's <u>Section 8 Renewal Policy Guidebook</u>, if the contract is for a period greater than five years, the owner must submit a new RCS at the end of each five-year life cycle of the RCS. Rents for the next five years will be adjusted based on the approved RCS.

During the COVID-19 pandemic, HUD will continue to pay the current rent amounts after the fifth-year anniversary date. Owners will be required to obtain and submit RCSs as soon as emergency conditions allow. New rent amounts based on the approved RCS, with any adjustments by HUD, will be made retroactive to the fifth-year anniversary date.

Owners and Management Agents are welcome to contact the PBCA Call Center with questions or concerns.



Special Claims Processing under COVID-19

On July 6, 2020, HUD provided guidance for the processing of vacancy claims for properties affected by COVID-19 during the period of March 27, 2020 to September 30, 2020. HUD has temporarily modified the start date for vacancy claims to accommodate for delays in filling vacant units as a result of impediments caused by COVID-19. Impediments resulting from state and local "stay-at-home" orders include, but are not limited to delays in units being prepared for occupancy, staff showing units to prospective residents, or meeting eligible applicants to process move-in documentation.

During this time, vacancy claims will be accepted for 60 days starting from the prior Tenant's Move-out Date as opposed to the Ready for Occupancy date, in instances where preparation of the unit for occupancy was prevented due to COVID-19. In addition, certain documentation submission requirements are amended, as noted below, for processing vacancy claims relating to COVID-19.

Temporary processing requirements for vacancy claims during the COVID-19 period:

- The claim must be received by HUD/CA within 180 days from the date the unit was vacated by a former tenant
- Claim Forms:
 - HUD 5270-A Part 2, Special Claims Schedule
 - HUD 52671-C, Special Claims for Regular Vacancies (use the date after the prior tenant move-out date to calculate the vacancy loss payment not to exceed 60 days)
 - For Claims submitted under this memo, Owner and Agents must mark the top of the form "COVID-19"
- Supporting Documentation:
 - Documentation as noted in the Special Claims Guide except with respect to unit readiness
 - Owner certification that COVID-19 has impeded the owner's efforts to fill the vacancy
 - Justification for all units explaining why the units remains vacant as a result of the COVID
 -19 pandemic
 - Certification that property marketing is compliant under the Affirmative Fair Housing Marketing Plan (AFHMP)

Special Claims for regular vacancies must be processed following the Special Claims Guide with the exception of the above date and documentation instructions.

In the event a property owner has submitted a vacancy claim prior to the issuance of the memorandum, and the special claim has been processed for payment, the owner may submit a supplemental vacancy claim for the gap period from the prior tenant's move-out date to the unit's ready for occupancy date. The gap period of days added to the days claimed on the prior submission must not exceed 60 days. No overlap in days can be claimed for payment.



Income Exclusion—Temporary Employment from the U.S. Census Bureau

On June 5, 2020, HUD issued Notice H 20-06, Exclusion from Annual Income of Temporary Employment from the U.S. Census Bureau, which provided instruction regarding exclusion of temporary income received from annual income, by residents, from the U.S. Census Bureau.

Every ten years in the United States, the constitution calls for an actual enumeration of the people, which is used for the appointment of seats in the House of Representatives among the states. The U.S. Census Bureau hires people to assist, temporarily, to count the population. As a Census partner, HUD is committed to supporting this temporary employment in order to help ensure the accuracy of the census counts. Owner/Agents are to exclude any temporary income payments received by residents from the U.S. Census Bureau.

Temporary is defined as employment lasting no longer than 180 days and not resulting in permanent employment. Employment verification of the dates of employment and amount of income must be maintained in the resident file.

Streamlining Final Rule

In December 2015 the President signed the Fixing America's Surface Transportation Act (FAST Act) into law. This allowed Public Housing Authorities (PHAs) and Owners to conduct full income recertifications with families with 90% or more of their income from fixed income every three years instead of annually. HUD issued an interim rule in December 2017 to align current regulatory flexibilities with those provided in the FAST Act and also sought to extend the streamlining changes that were proposed for the Public Housing and Housing Choice Voucher programs to certain Multifamily Housing Programs.

This <u>Streamlining Final Rule</u> finalizes the regulatory language to implement the FAST Act contained in the December 2017 interim rule. There was only one change at the final rule stage; the Final Rule clarifies that project owners are not required to make adjustments to non-fixed-income when using streamlined income determinations.

This article includes HUD responses to some of questions that were published in the final rule. Portions not applicable to the MFH program have been removed. This document does not contain all encompassing guidance for the Streamlining Final Rule. Owners and Agents are encouraged to read the rule in its entirety.

Implementation

1. Tenant Selection Plan (TSP). Would an O/A need to create a policy or update their TSP to reflect their choice of implementing the streamlined method?

<u>HUD Response:</u> If an O/A chooses to implement streamlined methods, the TSP should be updated where the property's annual recertification requirements and interim recertification reporting policies are discussed.

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Streamlining Final Rule (cont.)

2. Contract Amendments. How does HUD plan to amend assistance contracts of owners?

<u>HUD Response:</u> HUD does not believe that the changes made by the FAST Act interim rule necessitate a change in the assistance contracts of owners. The FAST Act interim rule made the following changes, none of which is addressed in a Housing Assistance Payment contract: (1) Streamlining certification of fixed income; (2) allowing for family declaration for assets under \$5,000; and (3) allowing owners to make a utility reimbursement of \$45 or less on a quarterly basis.

<u>3. Software</u>. How will the streamlining provisions be implemented with MFH's Tenant Rental Assistance Certification System (TRACS)? Will software packages know what to do if O/As either opt in or out of the streamlined certifications? May we suggest that some type of structure be implemented so that Management Occupancy Reviews can be conducted consistently across portfolios?

<u>HUD Response</u>: The provisions in this rule can be handled by the current iteration of TRACS. Although streamlining certifications is now permitted by O/As, form HUD–50059 is still required to be completed by O/As, signed by tenants, and submitted to TRACS. HUD will consider changes to TRACS that may make tracking streamlined years easier.

<u>4. Medical Expenses.</u> The rule does not address how to treat medical expenses for residents with fixed income. Should O/As conduct full recertifications for residents with medical expense claims while conducting streamlined recertifications for residents that do not claim medical expenses? This rule does not incorporate the increased standard medical deduction and new threshold for deduction of allowable medical expenses or incorporate authority to use the past year's income and expenses that will be coming as the Housing Opportunity through Modernization Act (HOTMA) changes are implemented where HUD intends O/As to continue to provide annual adjustments for verified allowable medical expense deductions.

<u>HUD Response</u>: The FAST Act and the interim rule provide administrative relief to O/As. O/As may elect a streamlined income determination for families on a fixed income. However, the provision only pertains to the verification of sources of income. O/As must continue to conduct third-party verification of deductions, including medical expenses deductions. HUD proposed a rule to implement income changes made by HOTMA, including medical expense deductions, published on September 17, 2019, at 84 FR 48820. HUD does not perceive a conflict between the FAST Act and HOTMA.

<u>5. Triennial Certifications.</u> Must an O/A verify income at the beginning of every third year of tenancy or every three calendar years from the date a tenant moves in? Please provide a common use form as a template or subsequent guidance or examples for O/As.

<u>HUD Response</u>: The provisions of this rule are discretionary. O/As that choose to implement streamlined annual recertifications must use third-party verification of income at move-in for new tenants and for existing tenants 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 third-party verified certification (year 2) and the next annual recertification (year 3). Third-party verification of income must be used for the following annual certification (year 4). HUD will not provide a common use form at this time.

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Streamlining Final Rule (cont.)

<u>6. Staggered Certifications</u>. Can an O/A 'stagger' the implementation of triennial recertifications of assisted households to mitigate substantial increases in work at the end of each triennial period?

<u>HUD Response</u>: Staggering recertifications has a potential impact of disparate treatment among similarly situated families. O/As choosing to implement triennial recertifications must afford all households the equal ability to utilize options in the final rule. HUD will not permit responsible entities to stagger recertifications. Income verifications following new admissions or interim reexaminations will naturally be staggered. Existing families will have had the first triennial verification 3 years after implementation. Any new admissions in the year following initial implementation for existing families will have income verification in the year following initial implementation and then 3 years after that.

7. Using Prior Certifications. HUD should allow the full certifications that owners and agents completed prior to the implementation of the rule on March 12, 2018, to qualify under the rule. This would allow PHAs and owners to benefit from the rule despite its delayed implementation.

<u>HUD Response</u>: The authority to utilize provisions of this rule was not granted until March 12, 2018. Certifications completed prior to the rule's implementation date cannot be included in the year 3 streamline certification cycle. Additionally, the first eligible COLA-based certification is April 2019.

8. Previously Reported Income. O/As should be allowed to use previously reported income in years 1, 2, or 3 for purposes of calculating tenant rent share and rent subsidy if the tenant has a transfer of unit or relocation.

<u>HUD Response</u>: For MFH programs, unit transfers cannot occur between properties. The new property must process a move-in certification and begin the streamlined process from the third-party verified move-in certification. For unit transfers within the property, owners are permitted to continue with the streamlined schedule unless the transfer involves circumstances that result in the family being unable to certify that 90 percent of income is fixed and fixed sources have not changed from the prior year.

9. Enterprise Income Verification. Will HUD include language from Notice H-2016–09 and Notice H 2010–19 on the use of the Enterprise Income Verification (EIV) System in the rule so that it is clear that O/As must continue full income verification for residents with more than 10 percent of income from non-fixed sources? Also, that O/As may use current applicable interest rates available from public sources or tenant-provided, third-party generated documentation to determine interest income on net family assets?

<u>HUD Response</u>: The provisions of the rule do not change established EIV requirements. EIV usage will be further defined in program guidance. Requirements related to determining interest income on net family assets are not changed are by this rule.

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Streamlining Final Rule (cont.)

Requests for Clarification

10. Hardships. Please provide clarification on what policies O/As should adopt to assist tenants that might experience a financial hardship under the rule. A tenant that receives a utility reimbursement has very limited or no income and therefore it would be difficult to determine what would constitute a hardship. Has HUD analyzed or calculated the amounts at which tenants may claim a financial hardship?

<u>HUD Response:</u> Hardship policies for utility reimbursements will be addressed through programspecific guidance.

11. Relationship with Annual Re-examinations. Please clarify that those projects that implement annual reexaminations for fixed sources of income would still have to adjust tenant-paid utility allowances.

<u>HUD Response:</u> The provisions of this rule do not affect the regulation and program guidance governing the requirements of adjusting utility allowances. O/As must perform utility allowance adjustments in accordance with established guidance.

12. Required Interim Recertifications. HUD should make explicit that interim recertifications are not required of O/As when the COLA is to take effect, but the COLAs will instead be applied to household income on an annual basis at their lease anniversary.

<u>HUD Response:</u> This rule requires that an adjustment be made at annual recertification. HUD is not prohibiting interim recertifications as a result of a change in the COLA. Tenants and O/As must continue to follow the income recertification requirements identified in the lease agreement.





PBCA Member Spotlight



Jenna Chamberlain—Management Assessment Specialist—Downstate NY

Explain your position with CGI?

Well, on the surface people might think that my job is just to visit properties here in NY to ensure that they are compliant with HUD regulations; however, it really isn't that simple. When I visit a site my goal is to help them understand HUD regulations, and how they go hand in hand with their own written policies and procedures. Every Management and Occupancy Review I conduct should be a learning situation for all staff who are involved, and the goal would be that they feel equipped to tackle any corrections that we may need to make to get the site where it needs to be.

How long have you been with CGI?

I will be with CGI three years this September.

What was your background prior to joining CGI?

Before CGI I was in the same shoes as our Owners and Agents here in NY; I worked at a site that served an Elderly/Disabled population.

What are your hobbies? Things you enjoy doing after you leave the office?

I really enjoy reading, cooking, going to concerts, and traveling around to all of the great craft beer breweries in NY. So far this socially distanced summer has been filled with books by the pool, and lots of cooking. I just finished a great book called The Ninth House by Leigh Bardugo, I could not put it down!

What brings you the most satisfaction in your day to day tasks?

This sounds so cheesy, but the most satisfying part of my job is helping an Owner/Agent work through a challenging issue. It gives me the opportunity to reach out to my team to compare our knowledge, and provide the best assistance that we can.

What is the best piece of advice that you could provide to an owner/agent?

Fall in love with reading. That is really the best advice I can give. Read your own written policies and procedures. Read the HUD Handbook 4350.3 REV-1 CHG-4. Those documents aren't any different than using a recipe, or reading instructions before assembling a book shelf; They are directions you need to get you to the end result.



All Residents of HUD Subsidized Properties—Call Center Poster



CGI

CGI provides Project-Based Section 8 Contract Administration services to the NYS Housing Trust Fund Corporation and is responsible for responding to resident concerns. CGI Call Center has a team of Customer Relation Specialists (CRS) that will receive, investigate and document concerns such as, but not limited to the following:

- Questions or concerns regarding work order follow-up.
- Questions regarding the calculation of your rent.
- Address health & safety and HUD Handbook 4350.3 concerns.

Call Center Purpose

- Call Center aids in ensuring HUDs mission of providing Decent, Safe and Sanitary Housing.
- Serves as a neutral third party to residents, owners and the public.
- Assists with clarifying HUD Occupancy Handbook 4350.3 requirements.

Call Center Contact Information and Business Hours

Hours of Operation: 8:30am to 5:30pm

Contact Numbers: 1-866-641-7901 TTY number: 1-800-662-1220 Fax: 518-218-7800

Written Summaries: 100 Great Oaks Blvd. Suite 120, Albany, NY 12203

Email: <u>NYPBCAContactCenter@cgifederal.com</u>

Website: http://www.pbcany.com

Concerns can be submitted by the following:

- Phone
- Fax
- Mail
- Email
- Voicemail
- FOIA- Freedom of Information Act request must be submitted directly to HUD

Required Information to open an inquiry

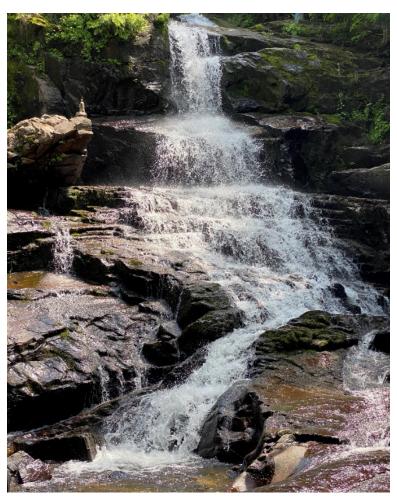
- Property name
- Caller's name (anonymous calls accepted)
- Caller's telephone number with area code
- · Caller's address including apartment number
- A brief, detailed description of the caller's concern(s)



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Have a safe and beautiful Summer!



The CA Quarterly Review

Ouestions or Comments?
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