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**Sent:** Monday, June 25, 2018 4:00 PM  
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**Cc:** Buyer, Daniel (NYSHCR) <[Daniel.Buyer@nyshcr.org](mailto:Daniel.Buyer@nyshcr.org)>  
**Subject:** FW: Public Comments to 9834 Information Request with OMB Approval Number: 2502-0178

Re: A. Overview of Information Collection

*Title of Information Collection:* Management Review for Multifamily Housing Projects.

*OMB Approval Number:* 2502-0178.

*Form Number:* HUD-9834.

M. Pollard,

I would like to submit the following comment to the “60-Day Notice of Proposed Information Collection: Management Reviews of Multifamily Housing Programs: HUD-9834” OMB Approval Number: 2502-0178:

We believe that the collection of information during the MOR process is a critical component of project oversight and risk assessment. We also believe MOR frequency should remain on an annual basis. We have routinely found that high performing projects welcome the onsite review  of their operations. Many projects utilize the process for internal performance assessments as well as to showcase their property. Moving to a risk based MOR scheduling process would provide for 2 and 3 year gaps in direct oversight including the verification of repairs to REAC physical inspection citations. Should HUD move to the risk based MOR scheduling, we suggest the utilization of PBCAs in a more intense follow up to each REAC physical inspection, in much the same manner as during the early years of the PBCA program. A 2 or 3 year absence of onsite monitoring would increase the chance and probability of noncompliance of both project management and physical condition, thus reducing the effectiveness of risk assessment.

Thank you,

Current regulations for subsidized housing (24 CFR Section 8) generally, though not consistently, call for management reviews to be conducted “at such intervals as [HUD] deems necessary.” Current regulations are under review and may be modified based on future needs of HUD.

**Gerard J. D’Huy**

Program Director

Project Based Section 8 Contract Administration

**New York State Homes & Community Renewal**

**New York State Housing Trust Fund Corporation**

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