

COMMENTS – HUD 9834

General Question

1. Would HUD consider creating a HUD Form 9834 specifically for PBCA's? This would eliminate questions/pages that are not applicable to PBCA's and reduce unnecessary paper retention.
2. When asking for comments, the federal register states to contact a person at HUD for copies of proposed changes and supporting documentation. The email address provided does not accept emails from anyone outside of HUD's agency. To provide comments that would be specifically related to this comment period would HUD consider publishing material so that is available and no need to request the information.
3. Would HUD consider another comment period when documentation is available to the industry?

Desk Review

1. Question 5 asks if a lead-based study has been conducted. Most older properties have had this inspection conducted. Would HUD be willing to enter this information in iREMS so that anyone conducting an MOR would not have to request this information each year. This would reduce unnecessary paper retention and would allow time to be focused on items that do change.
2. Question 1 asks about REAC inspections, is HUD going to update this to include new NSPIRE inspections?
3. Question 2 asks about EH&S items. Is HUD going to update the question to align with NSPIRE standards?
4. Question 6 asks about a HUD approved Lead Hazard Control Plan? Where would we find this information to answer this question?
5. Question 41 asks about a special rent increase and if one has been approved. Is this question necessary? In the many years since working with this program, we have not seen one approved.
6. Question 4 – Instructions are outdated. This will lead you to find REAC inspections but not NSPIRE. NSPIRE inspections are not housed in Secure Systems (iREMS).
7. Will HUD make NSPIRE inspections available in Secure Systems?

Onsite Review

1. Question 5d – what is the purpose of collecting the name and title of employee? Would HUD consider removing this portion of the question?
2. Question 20c – this question is covered in Section 17, specifically 17c. Would HUD consider removing this question.
3. Question 20d – this question is covered in Section 17, specifically 17c and d. Would HUD consider removing this question.
4. Question 22, section b – should there be a question asking if the tenant file contains HUD form 92006.
5. Question 22, section c – should there be a question asking if the tenant was provided HUD form 5380 and 5382, if applicable.
6. Would HUD consider adding a question that asks if the VAWA ETP complies with HUD requirements? There is currently no place in this section to capture this document (Section 14).
7. Section 25 - Would HUD consider adding a question that asks if O/A provided all material required for MOR (documents)?
8. Section B – Would HUD consider adding a question relating to proper notice for the reviewer to follow up on REAC inspection?
9. Section 14 – Should consider adding a question relating to waiting list. Specifically, was the notice to open or close waiting list published as required.
10. Section 19 – Should consider adding a question relating to voucher discrepancies or late vouchers. Specifically, are O/A's submitting vouchers timely and correcting discrepancies.
11. Section 22civ – Should consider adding a question relating to compliance of House rules. Specially, are house rules in compliance with HUD requirements.
12. Section 22civ – Should consider adding a question relating to compliance of Pet rules. Specifically, are pet rules in compliance with HUD requirements.
13. E14p: Should state "Is the fair housing logo included in published advertising materials, including the site sign?"
14. Question 5L – add an option for property management software.
15. Question 14n – Could you add N/A as an option for those that have a full waiting list and are not advertising.
16. Question 6c – Could you add an additional check box for "none".

Addendum A

This form does not support streamlining requirements and will require a revision to include additional reviews as instructed by HUD.

1. Will HUD be releasing a new Addendum A that complies with the requirements of streamlining for reviews that include additional certification reviews?

2. Question A1 – Would HUD consider adding a section to prompt reviewers to note the time and date application was received?
3. Question A1 – Would HUD consider adding a section that asks the reviewer if the application is signed and dated by applicants?
4. Section A – Would HUD consider adding a question that prompts reviewer to note if HUD Forms 5380 and 5382 were provided to move in files?
5. Question A8 – Would HUD consider adding a question relating to race and ethnicity form matching what the O/A reported on HUD form 50059? The only question asks if race and ethnicity form is in file.
6. Question A9 – Would HUD consider adding additional questions that ensure the addresses on 9887/9887A are correct?
7. Question B2 – Would HUD consider replacing the current question to include eligible citizenship criteria, Owners Notice #1, Declaration, Owners Summary Sheet, Family Summary Sheet, and verification of EN status for all applicants under 62?
8. Question B3 – Would HUD consider adding the date criminal and drug screening was required to current question?
9. Question B4 – Would HUD consider adding the date sex offender screening was required to current question.?
10. Question C3 – Would HUD consider adding VAWA lease addendum to current question?
11. Question C4 – Would HUD consider adding areas to this question that would prompt reviewers to note securing deposit noted on current lease, original lease and move in 50059? This will ensure there are no discrepancies between documents in the file.
12. Question A7 – Would HUD consider adding a question that asks if the move in inspection form includes the required statement, the unit is in decent, safe and sanitary condition? Or if NSPIRE changed this requirement, would HUD consider adding the required language that must be include on move in inspection forms?
13. Question D1 – Would HUD consider adding areas that prompt reviewers to look for initial, 120, 90, and 60 notices as applicable?
14. Section D – Would HUD consider adding a question relating to gross rent changes (50059) in file? Currently there is no question that addresses this requirement.
15. Question D3 – Would HUD consider adding areas that prompt reviewers to note date 50059 was sent to TRACs (imax) and signed by the tenant? This would ensure O/As are obtaining signatures prior to submitting for payment.
16. Question D4 – Would HUD consider adding criteria that require reviewers to note when 30-day notice was provided?
17. Section D – Would HUD consider adding a question relating to utility reimbursement checks provided to tenants? This would ensure O/As are providing timely payments to tenants as required.
18. Section D – Would HUD consider adding a question relating to EIV income discrepancy reports? Specifically, did the O/A pull the report with the EIV income report.

1. Section E – Would HUD consider adding a question that relates to income limits?
Specifically, are current income limits in use.
2. Question F3 – Would HUD consider adding an area that prompts reviewers to note the date security deposit was refunded?
3. Section G – Would HUD consider adding a question that asks if move out files contained evidence that HUD Form 5380 and 5382 was provided to rejected applicants.

*** If any changes are made to Addendum A, this would require changes/updates to the onsite review.