

## **Program Objective**

Idaho Housing and Finance Association helps ensure that Idahoans have affordable, safe, and sanitary housing — in good times and bad. When the Department of Housing and Urban Development (HUD) suspended Management Occupancy Reviews for some states in 2011, our association stepped up. Although we don't have a contractual obligation to do so, we continue to provide compliance guidance and feedback to owners and agents of Section 8 housing in Idaho. More importantly, we used the situation as an opportunity to customize the support we provide and expand the training we offer.

## **The Challenge**

In 2011, HUD rebid the Performance-Based Contract Administration (PBCA) services for the nation. Because of protests to the Government Accountability Office (GAO), contracts were not awarded for 42 states. To eliminate the fees that were being paid, HUD suspended Management and Occupancy Reviews (MOR) until new contracts could be awarded.

The suspension of MORs concerned owners and agents in our state. They were still expected to perform and maintain the resident files for rent and income calculations in accordance with HUD regulations but without the feedback and guidance that comes with the MOR process.

## **Innovative solution**

Our association determined our assistance and expertise would be necessary to respond to this important housing need. Because there wasn't a contractual obligation to provide these services, we had a unique opportunity to tailor our assistance based on what owners and management agents said they needed most. This innovative idea was presented to the public during our fall/winter training workshops in three locations throughout the state and in the compliance department newsletter. We created a form to help owners and agents request assistance from us and suggest types of services we might be able to provide. This service would be free to owners and agents and they were asked to complete the form and submit it to their housing compliance auditor.

## **How we made it work**

Our association asked that requests be made as soon as possible so that time and travel schedules could be managed to ensure the effective use of limited resources. Owners and agents were contacted to discuss specific requests and offered an approximate date for the assistance to be provided. As a result, services have been delivered in a variety of ways — in-person training, on-site reviews, audits from our corporate offices using electronic document transfers, live webcast training and webcasts of management meetings.

Surprisingly, we received requests for assistance from properties that are outside the normal scope of our association's oversight. For example, we were asked for help with properties with

236 and 811 funding, which are programs outside the purview of the PBCA contracts. We also had requests for technical assistance at properties in other states.

Of the 103 project-based Section 8 properties that our association oversees, 68 percent asked for some form of technical assistance. Services that have been provided:

- 100 percent file reviews;
- Training of on-site management staff on regulations;
- Enterprise Income Verification (EIV) system analysis and documentation practices;
- Topic-specific training sessions at annual management agent meetings on issues affecting specific areas of concern, such as hardship exemptions and EIV policies;
- Policy and procedure reviews and suggested adjustments;
- Forms and manuals audited for compliance and/or effectiveness;
- Sample file and physical inspections and;
- Affirmative Fair Housing Marketing Plan reviews.

These requests demonstrate the need for such services and show that our program could be replicated in other states.

### **Results of the Assistance**

Our association's compliance staff has provided technical assistance to properties in every region of the state and has successfully leveraged our existing partnerships with owners and agents throughout the state. We've completed the majority of the requests we've received and are still providing assistance until new contracts are awarded. Here's a sample of some of the positive feedback we've gotten:

***"When we were informed that MORs no longer would be conducted this year we were very concerned for the performance of the properties. No one wants to go two years making the same mistake. Thank you so much for coming to the site. We wish all the states were doing this." –Marla***

***"Your staff was so helpful and insightful. It is a gift to be able to have feedback on processes and suggestions for improvement without having a finding attached." –Amanda***

***"Thank you so much for coming to our annual meeting and providing your knowledge. We really appreciate you helping us out and your commitment to continuing education." –Rebecca***

Idaho Housing and Finance Association  
Compliance support through the MOR drought

**Summary**

The association continues to provide quality service to owners and agents, which supports our philosophy that compliance is about more than enforcement — it's about education. Technical assistance will continue to be offered through the interim contract and the training we offer will be expanded in the future.