

MaineHousing's Most Common Findings – Section 8 Program Rev. 3/2021

Finding	Citation	How to Avoid
Manager not using the correct HUD Model lease or addendum	HUD Handbook 4350.3 Rev-1 Chapter 6	Delete outdated templates and standardize forms for move-ins and annual recertifications.
Social Security Number not verified	HUD Handbook 4350.6 Section 3-9 and Appendix 3	Be clear to applicants that these are needed and request this information early on in the application process. Know what alternative verifications can be used if applicants do not have their SS card.
Student Verification issues- Not found, out dated or not followed up on.	HUD Handbook 4350.3 Section 3-13 Chapter 4, 4-4C8	Be certain student eligibility criteria is in your tenant selection plan. HUD has not issued a form for this – managers must develop their own. Criteria is different than for the LIHTC program. Due at move-in, annual and some interims.
Applicant Rejection Issues	HUD Handbook 4350.3 Section 4-9 H2017-5 VAWA Protection HUD Forms 5380 & 5382	Recommend sending rejection letters out from one location. Errors in the rejection process could result in Fair Housing issues. Tenant selection plan should be consistent with HUD requirements and spell this process out clearly. Denied applicants must be informed of their rights.
Disability Status of household member not verified	HUD Handbook 4350.3 Section 2-31 and Appendix 3 and Appendix 6-B	HUD provides two forms of verification for different program types (Forms HUD-90102 and HUD-90103). Maine has a different list of disabilities for reasonable accommodation purposes. See the Maine Human Rights website for Maine's more extensive list.
Incorrect Move-Out Date	MAT User Guide TRACS Release 2.0.2D 7-12E	Owners are entitled to an assistance payment only for the actual number of days during the month that the tenant occupied the unit. Exception for deceased tenants. Document move-out date in the file. Documentation on file must support how move-out date was arrived at.
Incorrect Social Security Income	HUD Handbook Chapter 5	This is typically due to managers using net instead of the gross amount before the Medicare deduction. At move-in cents identified in Award Letter must be part of annual income calculation.
Citizenship Declaration missing or incomplete	HUD Handbook 4350.3 Appendix 2A Section 3-12, 4-14 B.1.e Exhibit 3-5	Suggest that managers read over the forms so that they are familiar with them. Review them for completeness when they are returned by the applicant, don't just file them away.
Over 62 household's age not verified	HUD Handbook 4350.3 Section 3-28 and Appendix 3	This is required for deductions and allowances as well as for admittance to elderly properties. Know which alternative verifications can be used if applicants do not have their birth certificate.
Manager not properly using EIV	HUD Handbook 4350.3 Chapter 9 and section 9-3 and Exhibit 9-5	Reports must be run, reviewed, resolved, properly documented and retained per Owner/Agent EIV policies and procedures in compliance with HUD regulations.