

# Multifamily Housing

Partners' Satisfaction WITH HUD's Performance



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MULTIFAMILY HOUSING PARTNERS'  
SATISFACTION WITH HUD'S PERFORMANCE  
2010 SURVEY DATA BINDER

PREPARED FOR

The U.S. Department of Housing and Urban Development  
Office of Policy Development and Research

BY

**Martin D. Abravanel**

The Urban Institute

**Bohne G. Silber**

Silber and Associates

May 2011

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## FOREWORD

Achieving the U.S. Department of Housing and Urban Development's (HUD's) mission to provide quality, affordable homes located in strong, sustainable, inclusive communities requires having a robust and effective partner network. Accordingly, HUD works with various partners such as local governments, public and private agencies, and mortgage and housing providers to deliver housing and community-related services to the American people.

The 2010 partner satisfaction survey reported in this document replicates surveys conducted in 2001 and 2005 for the purposes of evaluating HUD's performance, as assessed by its partners. Spokespersons from the following ten partner groups were surveyed in connection with the programs they operate:

- Community Development Departments
- Mayors/local Chief Elected Officials (CEOs)
- Public Housing Agencies (PHAs)
- Fair Housing Assistance Programs (FHAPs)
- Fair Housing Initiatives Programs (FHIPs)
- FHA-Approved Single Family Mortgage Lenders
- Owners of Sections 202/811 Multifamily Properties
- Owners of HUD-insured Multifamily Properties
- Owners of HUD-assisted Multifamily Properties
- Housing Partnership Network (HPN)-Affiliated Non-Profit Organizations

Overall partner satisfaction with HUD is reasonably high but there are distinct partner-relationship issues and trends that suggest opportunities for improvement. Considering a range of aspects of HUD-partner relationships, there has been:

- a modest decline in satisfaction since 2005 on the part of community development directors and mayors/CEOs;
- a modest improvement in satisfaction on the part of multifamily owners, and
- a more substantial improvement in satisfaction on the part of FHAP agency and PHA directors.

Indeed, the PHA change is noteworthy and reflects a consistent decade-long trend: in 2001, PHAs stood out as being one of the most dissatisfied groups. While housing agencies still tend to be relatively less satisfied than community development, mayoral/CEO and FHAP partners, the gap among partner groups has narrowed over the past decade.

In addition to asking about general levels of satisfaction, the surveys covered partners' views of specific management issues and initiatives – feedback that will help “transform the way HUD does business.” HUD's FY 2010-2015 Strategic Plan pledges that the Department will be “a flexible, reliable problem solver and source of innovation for our partners.” The results of these surveys will undoubtedly energize the Department's thinking about how to strengthen the delivery of our programs and better assist the American public in a timely, caring, and cost-effective manner.



Raphael W. Bostic, Ph.D.  
Assistant Secretary for Policy  
Development and Research

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## PART 1: BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) wants its key implementation partners—intermediaries that deliver the Department's programs to its end customers—to be satisfied with HUD's performance, operations and programs. Indeed, HUD strives to improve partner satisfaction in order to enhance agency accountability, service delivery, and customer service.<sup>1</sup> When those who deliver HUD's programs receive quality service from HUD, end-customers in turn receive better service. Inasmuch as HUD's partners are its link to most of its end customers, the nature and quality of the relationships between HUD and its partners can have considerable consequence for achievement of the Department's mission.<sup>2</sup>

**Previous HUD partner surveys.** In 2001 and again in 2005 HUD sponsored a series of independent, confidential surveys of eight of its key partner groups, asking partners to assess the Department's performance from their various vantage points. The survey data were then published by HUD.<sup>3</sup>

**The 2010 partner surveys.** To measure change in partner satisfaction since 2005 as well as to examine partner-relationship issues of current interest, HUD sponsored a third series of surveys in 2010. Change measurement involved replicating the 2005 survey methodology and questionnaire content to ensure comparability. In addition to surveying the same eight partner groups surveyed in 2005, two additional groups were added in 2010: FHIP organizations and single family lenders. The 10 groups are as follows:

- **Directors of Community Development Departments** in cities and urban counties with an entitlement to Community Development Block Grant (CDBG) funds.

Community Development Departments are local government agencies that engage in a wide variety of community and economic development activities, often in conjunction with HUD's CDBG and other programs.

- **Mayors or other Chief Elected Officials (CEOs)** of communities with populations of 50,000 or more persons.

CEOs include mayors, town supervisors, council presidents, presidents of the boards of trustees, chairpersons of boards of trustees, chairpersons of boards of selectmen, first selectmen, township commission presidents, etc.

<sup>1</sup> *Annual Performance Plan: Fiscal Year 2009*, U.S. Department of Housing and Urban Development, February 2008, pp.103-104.

<sup>2</sup> HUD's mission is to create strong, sustainable, inclusive communities and quality, affordable homes for all. *HUD Strategic Plan: FY 2010-2015*, U.S. Department of Housing and Urban Development, May 2010.

<sup>3</sup> Martin D. Abravanel, Harry P. Hatry and Christopher Hayes, *How's HUD Doing? Agency Performance as Judged By Its Partners*, U.S. Department of Housing and Urban Development, Office of Policy Development and

Research, December 2001; and Martin D. Abravanel and Bohne G. Silber, *Partner Satisfaction with HUD's Performance: 2005 Survey Results and Trends Since 2001*, U. S. Department of Housing and Urban Development, Office of Policy Development and Research, March 2006. See also <http://www.huduser.org/portal/publications/polleg/partnersatis.html>.

- **Directors of Public Housing Agencies (PHAs)** that own/manage 100 or more units of conventional public housing.

PHAs are local public entities created through state-enabling legislation to administer HUD's public housing and Section 8 programs.

- **Directors of Fair Housing Assistance Program (FHAP) agencies.**

FHAPs are state and local government agencies that administer laws and ordinances consistent with federal fair housing laws.

- **Directors of Fair Housing Initiatives Program (FHIP) organizations.**

FHIPs are fair housing and other non-profit organizations that receive funding from HUD to assist persons believing they have been victims of housing discrimination; they process housing discrimination complaints, conduct preliminary investigations of such complaints, and engage in education and outreach activities related to housing discrimination.

- **Directors of non-profit housing organizations affiliated with the Housing Partnerships Network (HPN).**

Previously the National Association of Housing Partnerships (NAHP), the HPN consists of independent non-profit organizations located across the nation that engage in a wide variety of housing-related activities such as development, lending, and housing provision.

- **Owners of Sections 202 and 811 multifamily housing properties.**

Section 202 provides housing with supportive services for elderly persons; Section 811 provides housing with supportive services for persons with disabilities.

- **Owners of HUD-insured (unsubsidized) multifamily housing properties.**

These properties have mortgages insured by HUD/FHA that have neither rental assistance nor mortgage interest subsidies. Owners represent a range of entities including: public agencies; non-profit, limited dividend, or cooperative organizations; and private developers and profit-motivated businesses.

- **Owners of HUD-assisted (subsidized) multifamily housing properties.**

These properties are either insured under a HUD/FHA mortgage insurance program that includes a mortgage interest subsidy or provided with some form of HUD rental assistance. Owners may be for-profit businesses or non-profit organizations.

- **Officials of FHA-approved single family mortgage lending institutions.**

FHA-approved lenders (such as mortgage companies, banks, savings banks, savings and loan associations, credit unions, state or local government agencies, or public or state housing agencies) are authorized, based on their approval type, to originate, underwrite, hold and/or service forward or reverse mortgages, manufactured homes, or property improvement loans for which FHA insurance is provided.

How these partners believe HUD is doing in its quest for management excellence and whether there has been change over time are the primary issues addressed by the 2010 surveys. The complete results and description of the methodology are presented for all partner groups in a separate document, *Partner Satisfaction with HUD's Performance: 2010 Survey Results and Trends Since 2005* (U.S. Department of Housing and Urban Development, May 2011).

This document includes a detailed presentation of survey results for one partner group: multifamily housing owners. Instead of being surveyed collectively, however, multifamily owners were categorized into three types based on distinct HUD program clusters. The types are as follows:

- **Owners of Section 202/811 properties.** Section 202 provides housing with supportive services for elderly and handicapped persons; Section 811 provides housing with supportive services for persons with disabilities.
- **Owners of HUD-insured (unsubsidized) properties.** These consist of multifamily properties whose mortgages are insured by HUD where neither rental assistance nor mortgage interest subsidies are provided.
- **Owners of HUD-assisted properties.** These consist of multifamily properties that are either insured under a HUD mortgage insurance program involving mortgage interest subsidies or provided with some form of HUD rental assistance.

Each type is reported separately in this document. A comparable document reporting on the 2005 multifamily partner survey can be found on the HUDUSER website.<sup>4</sup>

<sup>4</sup> [http://www.huduser.org/portal//Publications/pdf/Housing\\_binder.pdf](http://www.huduser.org/portal//Publications/pdf/Housing_binder.pdf).

**The 2010 multifamily owners' sample.** Survey questionnaires were sent to samples of each type of multifamily owner. The samples were based on property lists provided by HUD's Office of Housing. Individual properties were clustered by type and, within each, aggregated by ownership entity such that owners of one or more properties were listed only once. Ownership entities were randomly sampled from each of the three lists and also from a fourth list containing entities that owned multiple types of properties.<sup>5</sup>

In total, questionnaires were sent to a sample of 4,852 ownership entities; 3,017 of them responded--a 62 percent response rate. The sample and response distributions are as follows:

<sup>5</sup> Since some entities own properties that fall into two or all three types, a fourth (multiple types) category was also created and a very small number of owners were randomly sampled from that category. This was done so it would be possible to extrapolate survey results to the full universe of multifamily ownership entities (using appropriate weights to account for the disproportionate sampling across types), should that be desired at some future point. However, based on the Office of Housing's determination that the three types are too distinct to be aggregated into a single group, the results of the multiple-category type are not reported in this document.

Type	Universe Size*	Sample Size	Number of Respondents	Response Rate
Section 202/811	2,523	1,726	1,166	68%
HUD-Insured	1,163	1,163	693	60%
HUD-Assisted	4,419	1,913	1,117	58%
Multiple	824	50	41	82%
Total	8,929	4,852	3,017	62%

\*This represents the universe of ownership entities, some of which own multiple properties.

The survey questionnaire requested that owners (including persons with the title of CEO, managing general partner, president, chair, principal or director) respond to the survey. However, it was recognized that such persons might delegate responsibility for responding to others, including property managers, who have more direct relationships with HUD. In that instance, respondents were asked to do their best to answer the questions “as the owner would answer them.” The distribution of respondents by partner group type is shown in the following table:

Respondent were:	Partner Group Type		
	Section 202/811	HUD-Insured	HUD-Assisted
Owners/CEOs/managing general partners/presidents/chairperson/principals/directors	33%	50%	47%
Other company/organization senior officials	14	13	10
Other company/organization employees	5	5	3
Property managers/managing agents	41	27	37
Other	7	5	4
Total	100%	100%	101%*

\*Does not total 100% due to rounding.

**Reporting results.** Survey highlights are briefly summarized in Part 2, below. In Part 3, responses to each item in the questionnaire are reported on a separate page—as bar charts for easy reference and separately for each multifamily ownership type. In Part 4, verbatim responses to an open-ended question (edited to protect the identities of respondents) are reported. A facsimile of the survey questionnaire appears in the appendix.

As a guide to using Part 3, please note that respondents who answered “don’t know” to any particular question are included in the percentage distribution of responses but not shown in the bar charts; hence, the sum of the responses displayed may not equal 100 percent. However, respondents who did not answer any particular question are excluded from the percentage distribution of responses. The number of respondents answering each

question (including answering “don’t know”) is shown in parentheses above each bar.

For each question, survey results are displayed as follows:

- **For the total partner group.** The left most bars on each page display the results for the question shown at the top of the page, for the total partner group. If the same question asked in 2010 had been asked in 2005, the 2005 results are also displayed for comparison purposes.
- **By the number of properties the entity owned.** Results are reported separately for those owning one property and those owning two or more properties.
- **By number of units the entity owned.** Results are reported separately for those owning 200 or fewer units and those owning more than 200 units.
- **By the respondent's/entity's frequency of contact with HUD.** Respondents were asked how frequently they had contact with HUD during the preceding twelve months—with possible response categories of “very frequent,” “somewhat frequent,” and “not very frequent.” Results are reported separately for each category.
- **By the respondent's title or position.** Results are displayed separately for owner respondents and other (non-owner) respondents.
- **By the respondent's perception of the nature of their HUD-partner relationship.** Respondents were asked if they viewed their relationship with HUD as involving mainly support (such as in the form of funding, technical assistance, information), mainly regulation (consisting of HUD making rules, assuring compliance with them, making assessments, etc.) or equal amounts of support and regulation. Results are shown separately for those perceiving (a) mainly regulation and (b) mainly support, or equal amounts of support and regulation.

## PART 2: SURVEY RESULTS IN BRIEF

Part 3, beginning on page 12, displays responses to each survey question asked of multifamily owners as well as the number of owners responding to each question. This Part provides a brief executive summary of those results.

**Satisfaction with HUD's overall performance.** In 2010, a majority of multifamily owners were satisfied with HUD's overall performance, the HUD programs with which they dealt, and the way HUD ran those programs.<sup>6</sup> A somewhat greater proportion of Section 202/811 owners were satisfied on each score than HUD-insured or HUD-assisted owners, as shown below:

Percent of Multifamily Owners Expressing Satisfaction with:	Partner Group Type		
	Section 202/811	HUD-Insured	HUD-Assisted
HUD's Overall Performance	76%	68%	71%
HUD's Programs	81%	70%	73%
How HUD Runs its Programs	69%	59%	62%

While there is no statistically significant difference in satisfaction with HUD's overall performance between 2005 and 2010, there is a statistically significant increase in the proportion of owners saying they are *very* satisfied with HUD's

<sup>6</sup> Satisfaction is defined as the sum of respondents who say they are "very satisfied" and "somewhat satisfied."

overall performance between the two years.<sup>7</sup> In addition, there is a statistically significant increase in the proportion of Section 202/811 and HUD-assisted owners who are satisfied with the way HUD currently runs the programs with which they deal, and a statistically significant increase in the proportion of HUD-insured partners who are *very* satisfied with such programs.

**Dealing with HUD and/or contractors.** Multifamily owners were asked if they had dealt more with HUD, more with HUD's contractors/third-party contractors, or about equally with HUD and HUD contractors during the preceding year. As shown below, HUD-assisted owners, as compared to the other two ownership types, were more likely to deal with HUD contractors.

Multifamily Owners' Dealings with HUD and Contractors Over the Past Year (Column Percentages)	Partner Group Type		
	Section 202/811	HUD-Insured	HUD-Assisted
Dealt more with contractors	20%	15%	44%
Dealt with HUD and contractors about equally	19%	15%	20%
Dealt more with HUD	49%	55%	29%
Dealt only with HUD (i.e., no dealings with contractors)	11%	13%	5%

\* Column percentages may not sum to 100 because of rounding error or non-response.

<sup>7</sup> See Part 3 for displays of these data; and see *Partner Satisfaction with HUD's Performance: 2010 Survey Results and Trends Since 2005* for information about statistical significance.

Of those multifamily partners who dealt with contractors, majorities of each ownership type expressed satisfaction with the service that had been provided—as shown below. Section 202/811 owners expressed satisfaction somewhat more frequently than the other ownership types.

For owners who dealt with third-party contractors--	Partner Group Type		
	Section 202/811	HUD-Insured	HUD-Assisted
Percent satisfied with service provided by contractors	80%	62%	71%

**Perceived clarity of functions and responsibilities across HUD's offices, hubs, centers and PBCAs.**

Multifamily owners may work with multiple HUD offices, hubs, centers and performance-based contract administrators (PBCAs) for various purposes. As shown below, however, not all multifamily owners were clear about the different functions and responsibilities of these units.

Percent responding that the functions and responsibilities of different HUD offices, hubs, centers and PBCAs are:	Partner Group Type		
	Section 202/811	HUD-Insured	HUD-Assisted
Very clear	18%	11%	14%
Somewhat clear	37	33	42
Somewhat unclear	21	19	23
Very unclear	9	11	8
DK/NA	15	26	13
Total	100%	100%	100%

While there was some improvement in multifamily owners' understanding of the different functions and responsibilities of distinct HUD entities since the previous HUD surveys in 2005 (see Part 3), such improvement has not been dramatic.

**Satisfaction with individual aspects of HUD-multifamily owner interactions.**

Multifamily owners expressed a range of opinions about aspects of their relationship with HUD in 2010, as shown on page 8. Their responses are summarized as follows:

- *High levels of satisfaction* (80 percent or higher) were not evident for any aspect of HUD-multifamily owner interactions in the 2010 survey.<sup>8</sup>
- *Lower levels of satisfaction* (from 79 percent to 50 percent) were expressed regarding most aspects of HUD-multifamily owner interactions.
- *Low levels of satisfaction* (less than 50 percent, highlighted in brown) were expressed by HUD-insured and HUD-assisted owners in the 2010 survey regarding the clarity of HUD rules and requirements.

<sup>8</sup> The 80 percent or greater standard for designating high levels of satisfaction applies to the complete set of HUD Partner surveys.

Percent of Multifamily Owners Expressing Satisfaction with Various Aspects of their Interactions with HUD	Partner Group Types and Survey Year					
	Section 202/811		HUD-Insured		HUD-Assisted	
	2010	2005	2010	2005	2010	2005
Competence of HUD people	79	75	71	64	75	72
Quality of information received from HUD	78	79	74	68	76	69
Extent to which HUD employees have knowledge, skills and ability to do their work	79	79	68	63	74	66
Responsiveness of HUD people	77	74	69	62	73	68
Ability to reach HUD people	74	76	67	67	69	73
Physical inspections by HUD's Real Estate Assessment Center, REAC	70	69	60	52	58	52
HUD's capacity to monitor and provide oversight related to owners' properties	74	69	59	52	64	51
Timeliness of information from HUD	72	67	66	58	66	60
Quality of guidance from HUD	69	67	64	52	64	57
Electronic financial reporting to REAC	67	63	54	52	62	59
Consistency of guidance from HUD	65	62	58	50	61	55
Ability of HUD field office personnel and contractors working on behalf of HUD to consistently interpret policies and regulations pertaining to owners' properties	67	63	61	49	62	57
Time commitment required to comply with HUD reporting requirements	61	59	55	46	53	49
Timeliness of decision making by HUD (i.e., requests for waivers, rulings & approvals)	60	51	54	42	52	42
Clarity of HUD rules and requirements	50	55	48	42	44	43

It is noteworthy that, in many instances, the proportions of satisfied multifamily owners were somewhat higher in 2010 than they had been in 2005. Some, but not all, of the differences are statistically significant.<sup>9</sup>

#### Perceived nature of partner-HUD relationships.

Many multifamily owners saw their relationship with the Department as involving mainly support by HUD (in the form of funding, technical assistance, information, etc.) or an equal amount of support and regulation (the latter consisting of HUD making rules, assuring compliance with them, making assessments, etc.). However, 32 percent of Section 202/811 owners, 50 percent of HUD-insured owners, and 41 percent of

<sup>9</sup> See Part 3 for displays of these data; and see *Partner Satisfaction with HUD's Performance: 2010 Survey Results and Trends Since 2005* for information about statistical significance

HUD-assisted owners considered their relationship with HUD to mainly entail regulation. Consistently, with respect to the full range of issues covered by the 2010 partners' survey, a smaller proportion of the latter were satisfied with HUD as compared to those who saw their relationship in terms of mainly support or support and regulation in equal amounts.

**Usefulness of training and technical assistance activities.** Many multifamily owners, particularly those with HUD-insured properties, had not experienced the various types of training or technical assistance activities offered by or in conjunction with HUD. These activities included HUD's webpage, HUD-sponsored conferences, training programs

conducted by contractors, HUD participation in panel discussions and training sessions set up by non-HUD groups, HUD's Webcast training, and HUD-sponsored satellite broadcasts. For example, more than two-thirds of HUD-insured owners had not experienced any such training or technical assistance activity except for accessing HUD's Webpage.

Multifamily owners who had experienced HUD-related training or technical assistance activities generally found them to have been at least somewhat useful. Variations in the extent of satisfaction across multifamily partner group types and by the different types of activities are displayed below.

HUD Multifamily Owners' View about the Usefulness of Various Aspects of HUD Training or Technical Assistance Activities (Row Percentages* by Partner Group)															
Training or Technical Assistance Activity	Section 202/811					HUD-Insured					HUD-Assisted				
	Very Useful	Some-what Useful	Not too Useful	Not Useful at All	Have Not Used	Very Useful	Some-what Useful	Not too Useful	Not Useful at All	Have Not Used	Very Useful	Some-what Useful	Not too Useful	Not Useful at All	Have Not Used
HUD's Webpage	23	48	11	2	12	19	37	9	2	27	21	47	13	4	10
HUD-sponsored conferences	22	26	5	1	40	8	11	4	2	68	21	27	7	2	37
Training programs conducted by contractors	21	28	3	1	37	5	13	3	2	67	22	34	6	1	28
HUD participation in panel discussions and training sessions set up by non-HUD groups	14	20	6	2	45	5	10	3	2	68	15	24	8	3	39
HUD Webcast training	10	27	8	2	45	2	9	4	2	73	11	24	11	4	40
HUD-sponsored satellite broadcasts	9	20	7	2	52	1	7	4	2	75	8	21	10	4	47

\* Row totals for multifamily partner types may not equal 100% because of rounding error or non-response to particular questions.

**Effectiveness of communications media.** As tools for communicating with its partners, HUD has increasingly relied on electronic transmission of information, including notices or guidance. Multifamily owners were asked about the

effectiveness of various communications media. Their responses are shown below.

HUD-insured owners were less likely to have used HUD listservs and HUD-website postings than the other two

ownership types. Somewhat higher proportions of owners of all three types of properties considered e-mail to be very effective, while smaller proportions considered HUD's website postings to be very effective. Section 202/811 and HUD-assisted owners have increasingly found HUD listservs to be very effective: compared to 15 percent of Section 202/811

owners who thought they were very effective in 2005, 29 percent considered them to be very effective in 2010; and compared to 17 percent of HUD-assisted owners who thought they were very effective in 2005, 31 percent considered them to be very effective in 2010.

HUD Multifamily Owners' View about the Effectiveness of Various Aspects of HUD Communications Media (Row Percentages* by Partner Group)															
Electronic Communications	Section 202/811					HUD-Insured					HUD-Assisted				
	Very effective	Some-what effective	Not too Effective	Not Effective at All	Have Not Used	Very effective	Some-what effective	Not too Effective	Not Effective at All	Have Not Used	Very effective	Some-what effective	Not too Effective	Not Effective at All	Have Not Used
E-mail	41	34	6	2	14	32	28	7	3	26	37	35	6	2	15
HUD listservs	29	32	6	2	25	13	20	5	3	50	31	33	8	2	19
HUD-website postings	18	38	14	3	21	8	22	10	4	47	16	36	17	3	21

\* Row totals for multifamily partner types may not equal 100% because of rounding error or non-response to particular questions.

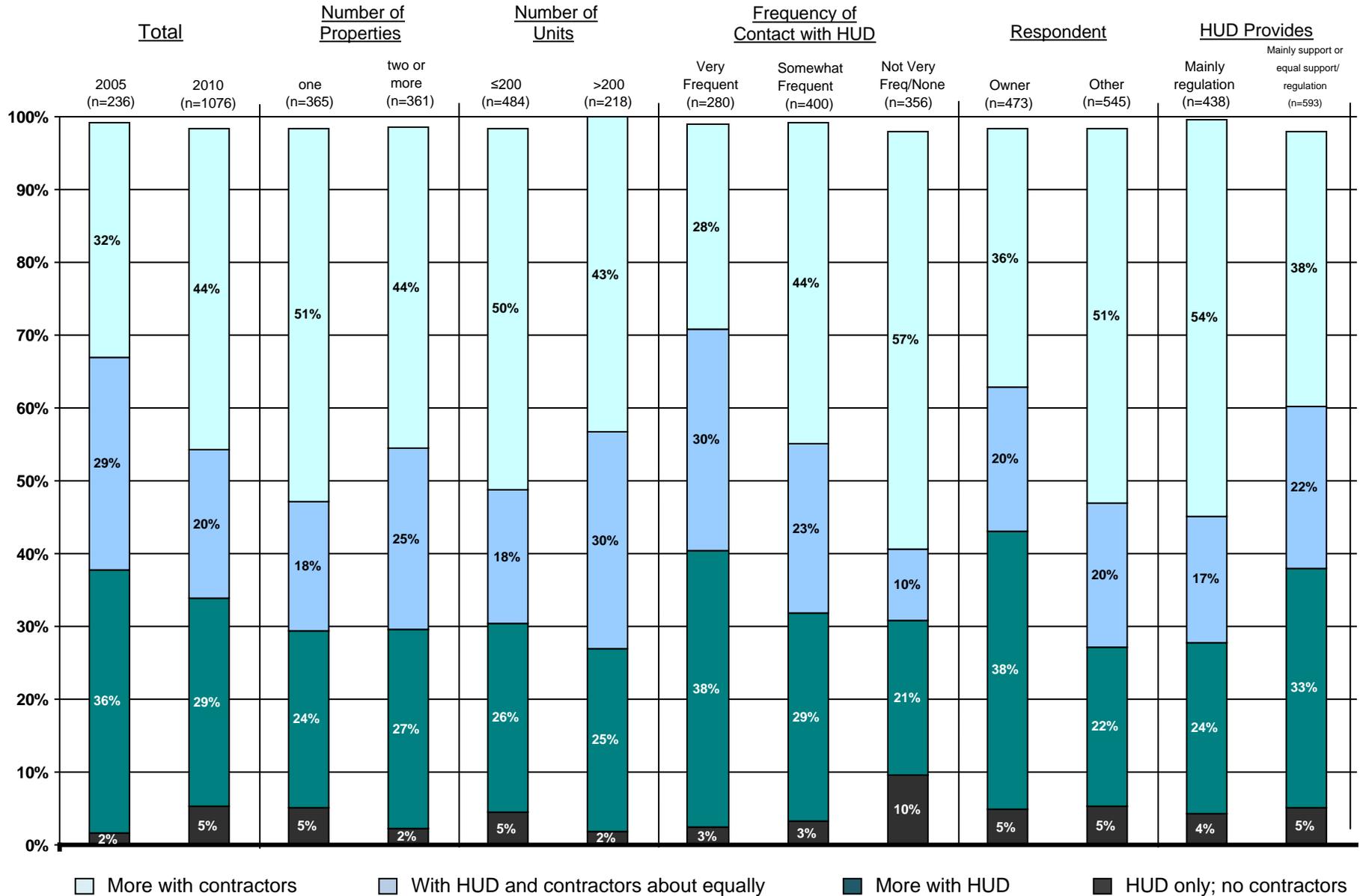
### **PART 3: BAR CHARTS OF EACH SURVEY QUESTION**

This Part contains bar charts showing responses to each survey question by:

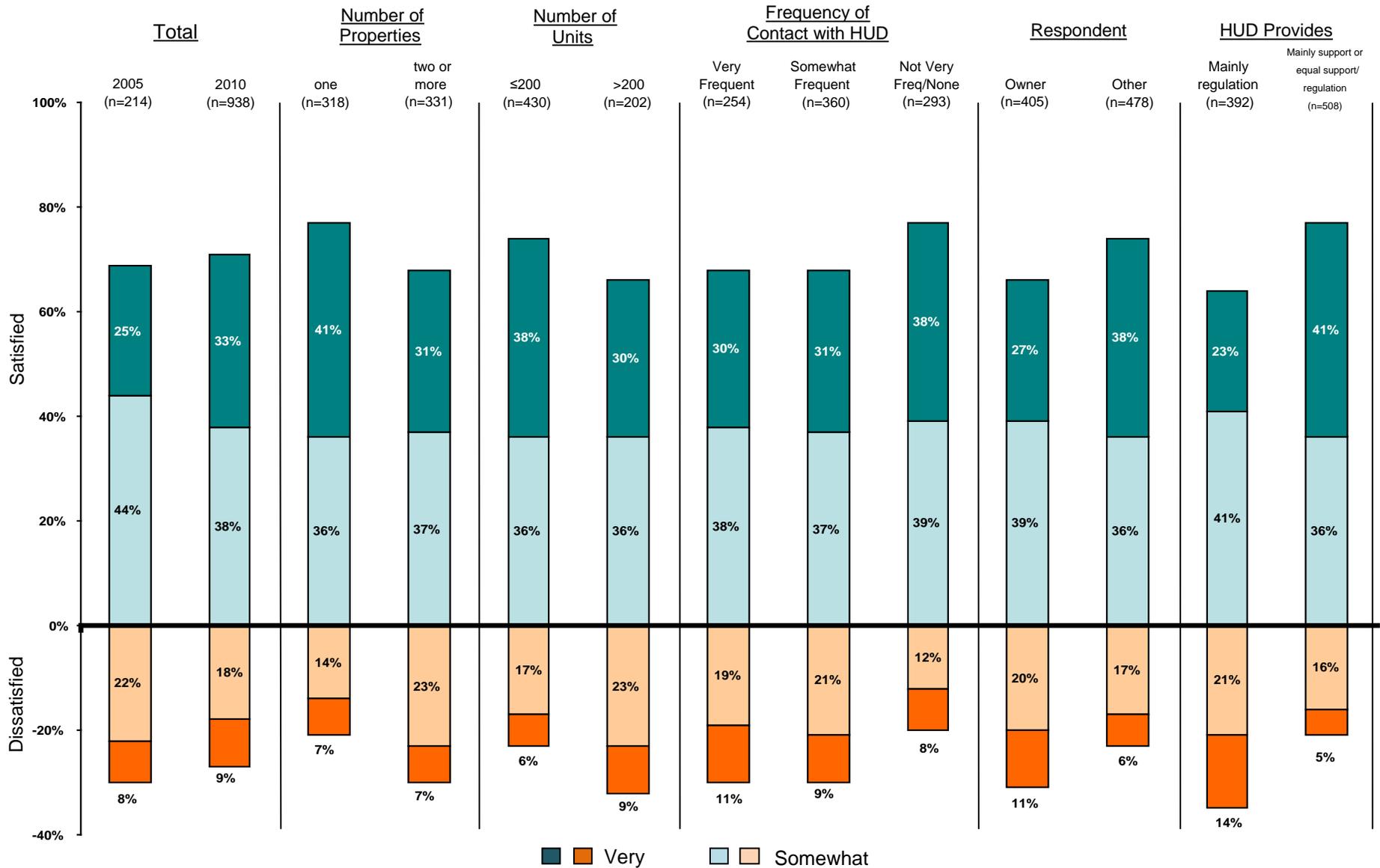
- A. HUD-assisted multifamily property owners;
- B. HUD-insured multifamily property owners; and
- C. Section 202/811 multifamily property owners.

**A. HUD-ASSISTED OWNERS**

**Question 3.** During the past twelve months, when you interacted with HUD, were your dealings more with HUD, or were they more with HUD's contractors/third-party contractors?

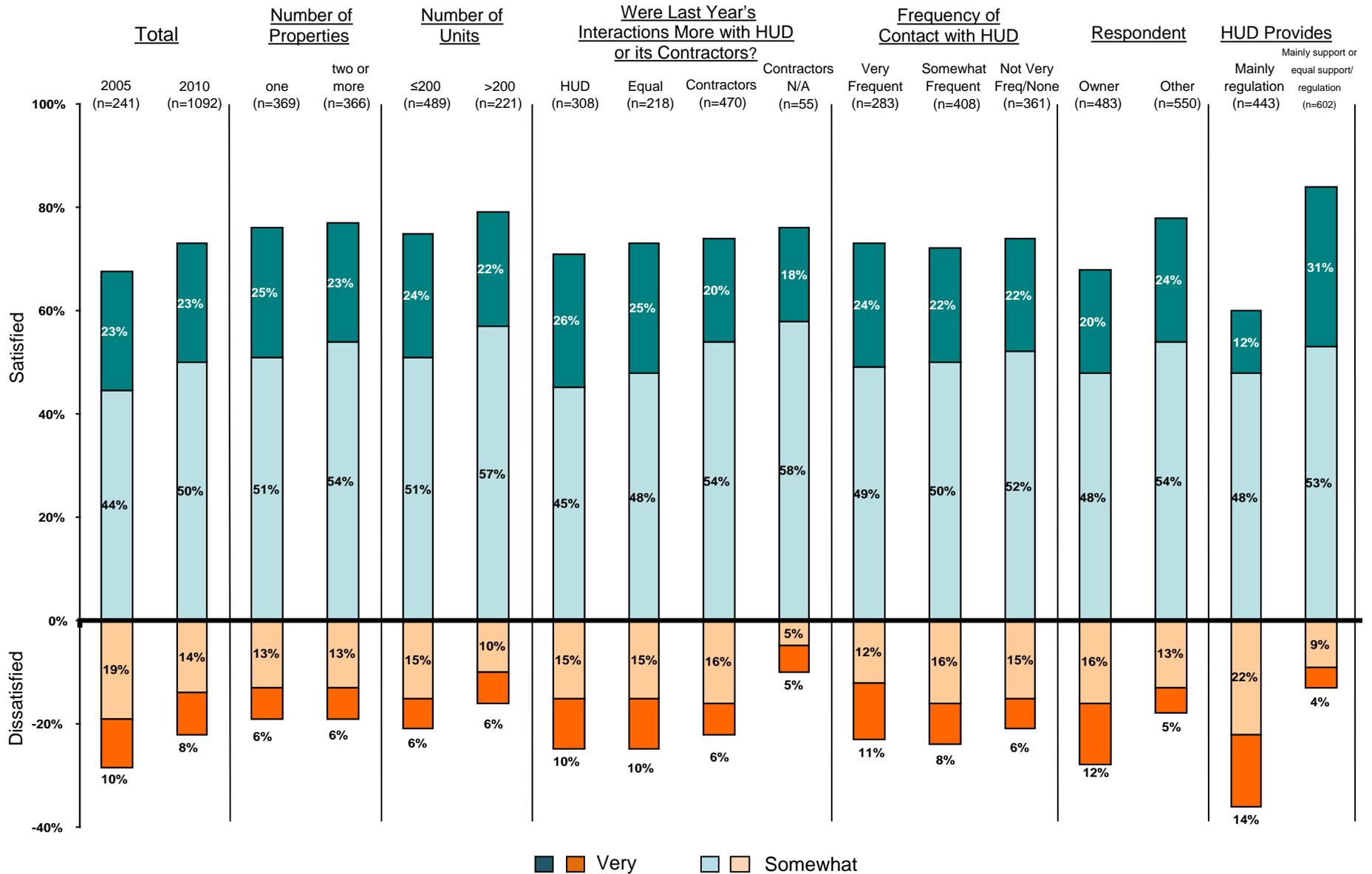


**Question 4.** Overall, taking everything into consideration, how satisfied or dissatisfied are you with the service provided by HUD's contractors/third-party contractors?



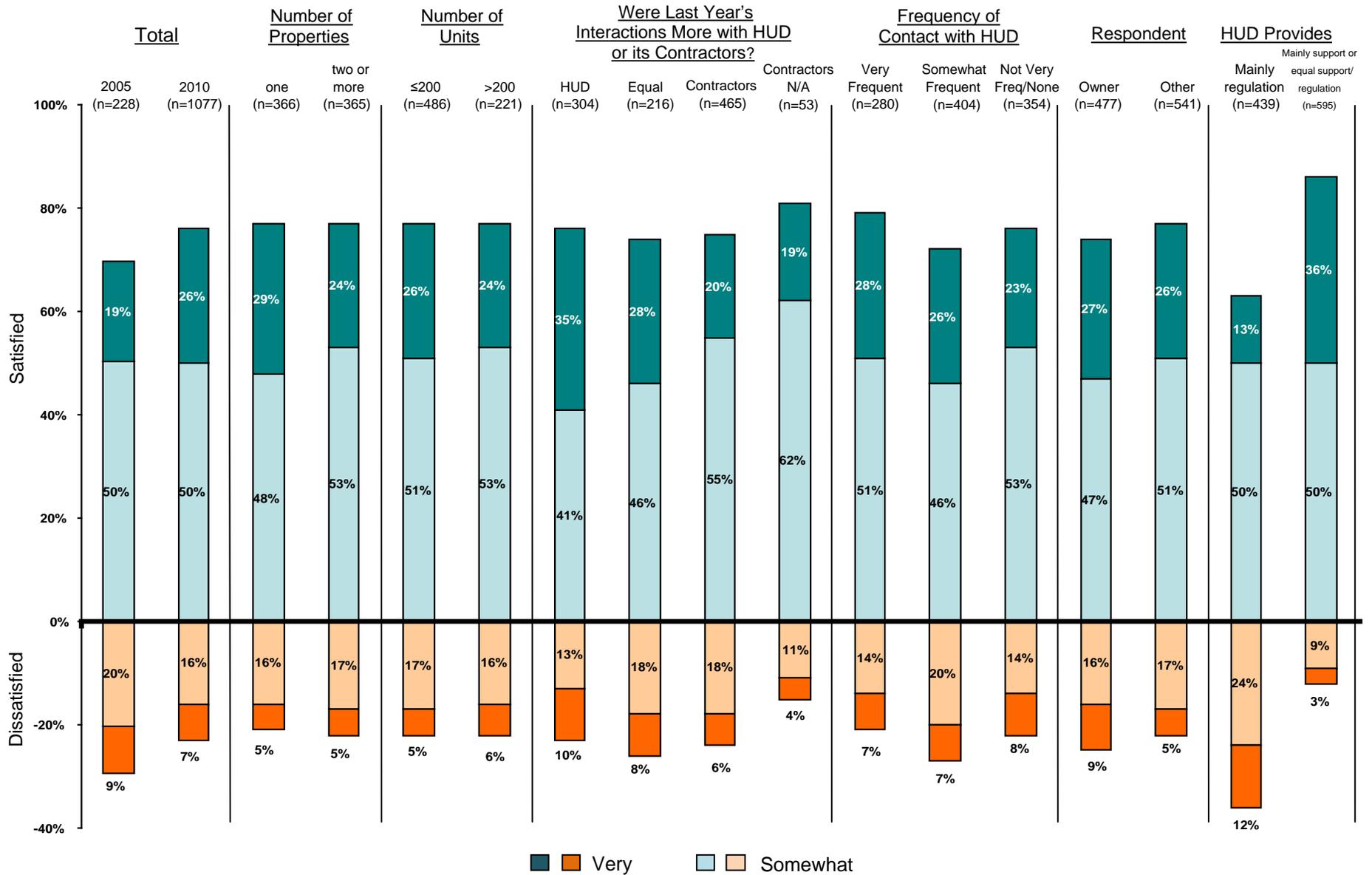
This chart excludes the 144 organizations that said they do not deal with HUD's contractors.

**Question 6a.** Thinking first about HUD programs with which you currently deal and then about how HUD runs those programs, how satisfied or dissatisfied are you, in general, with the HUD programs you currently deal with?

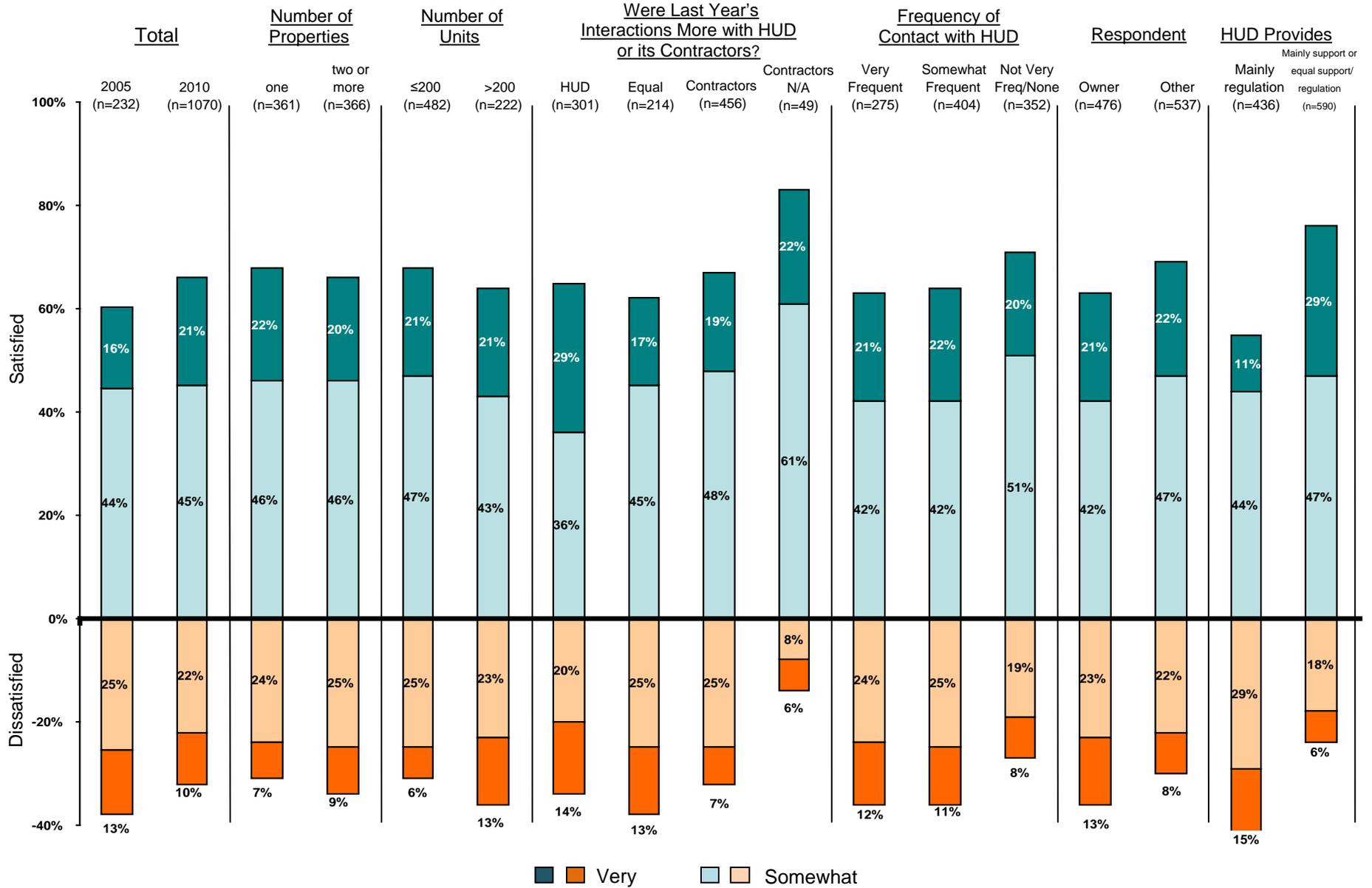




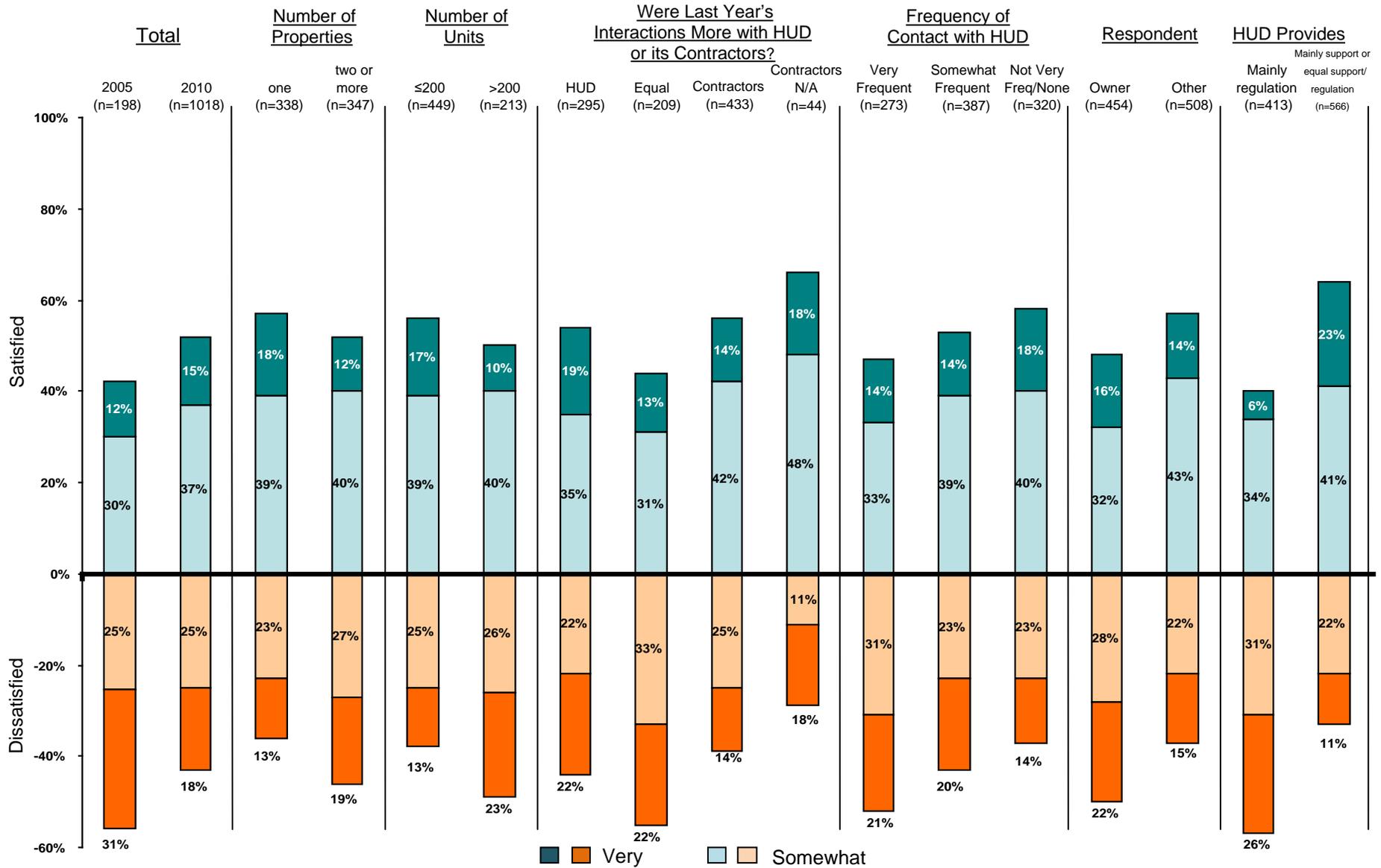
**Question 7a.** How satisfied or dissatisfied are you, in general, with the quality of the information you currently receive from HUD?



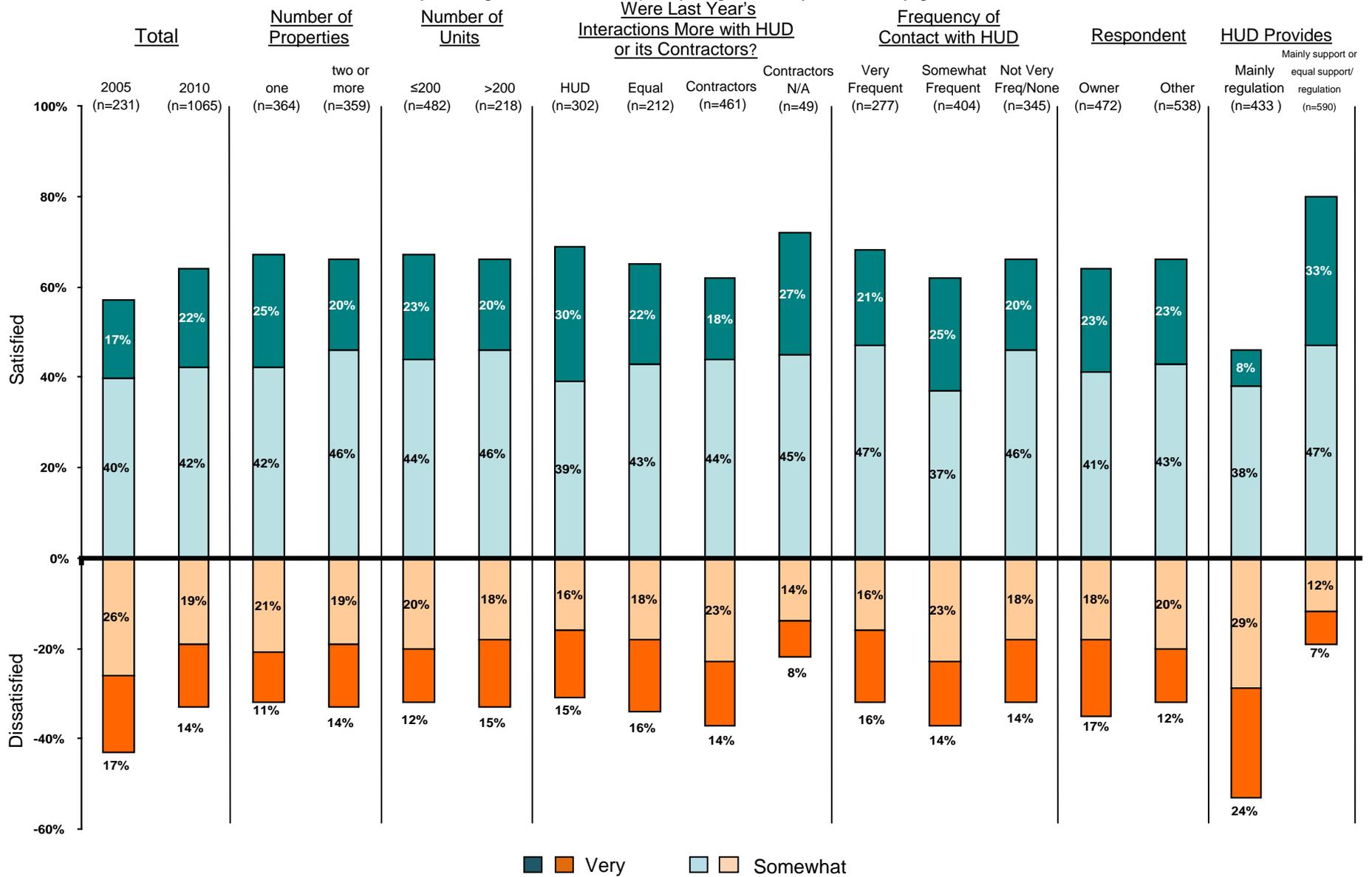
**Question 7b.** How satisfied or dissatisfied are you, in general, with the timeliness of the information you currently receive from HUD?



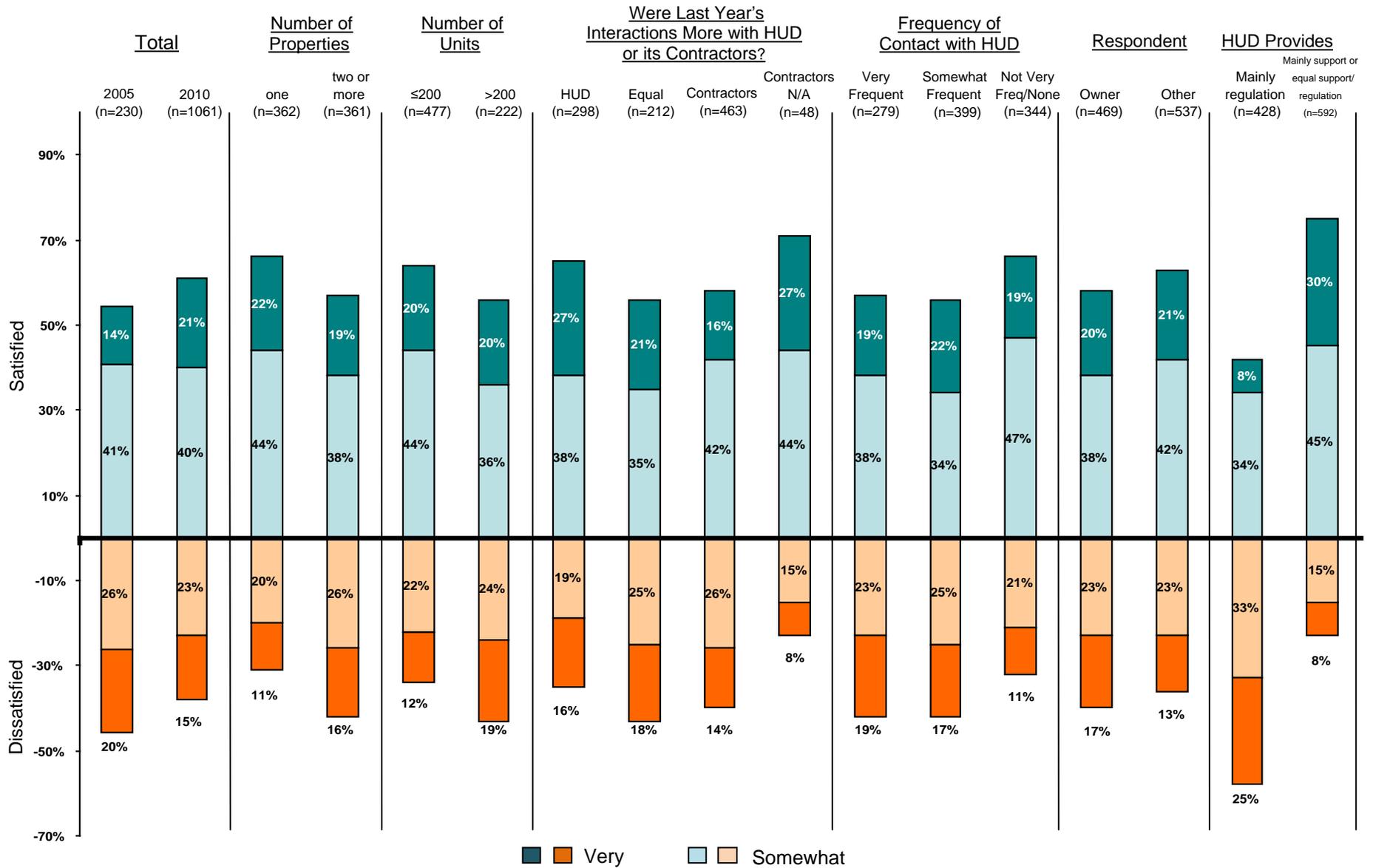
**Question 7c.** How satisfied or dissatisfied are you, in general, with the timeliness of decision-making by HUD (such as requests for waivers, rulings, and approvals)?



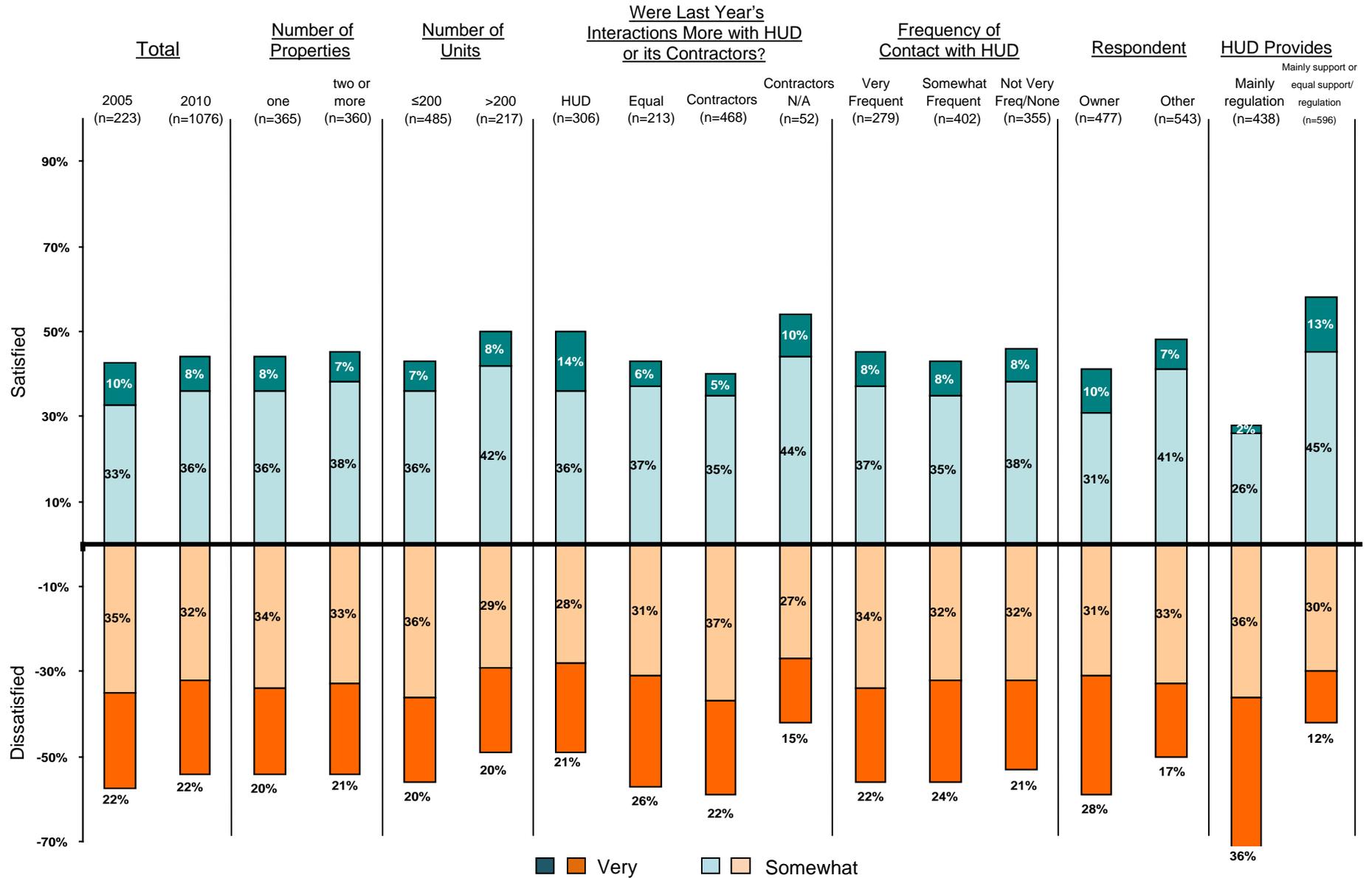
**Question 7d.** How satisfied or dissatisfied are you, in general, with the quality of guidance you currently get from HUD?



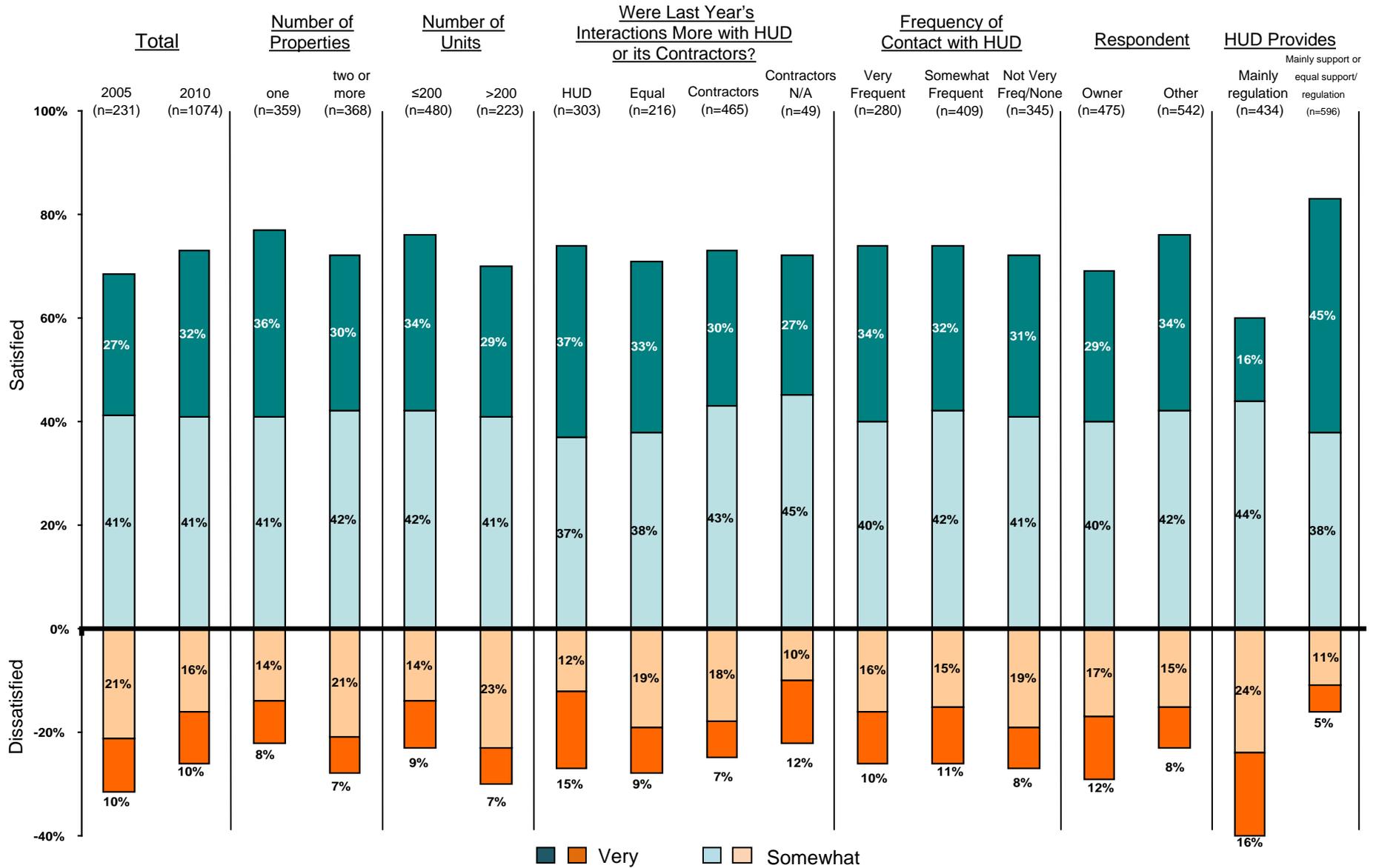
**Question 7e.** How satisfied or dissatisfied are you, in general, with the consistency of guidance you currently get from HUD?



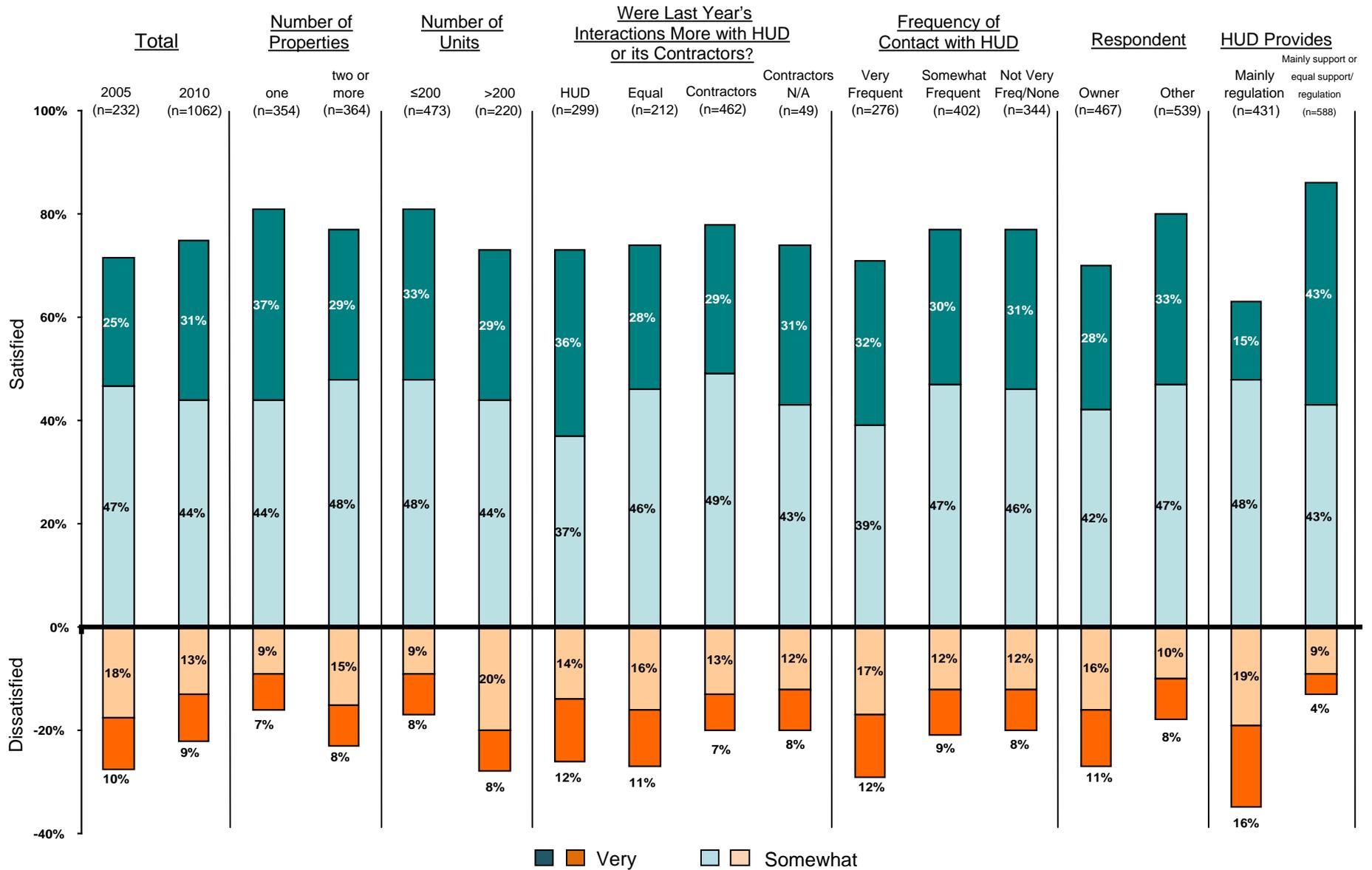
**Question 7f.** How satisfied or dissatisfied are you, in general, with the clarity of HUD rules and requirements that apply to your agency?



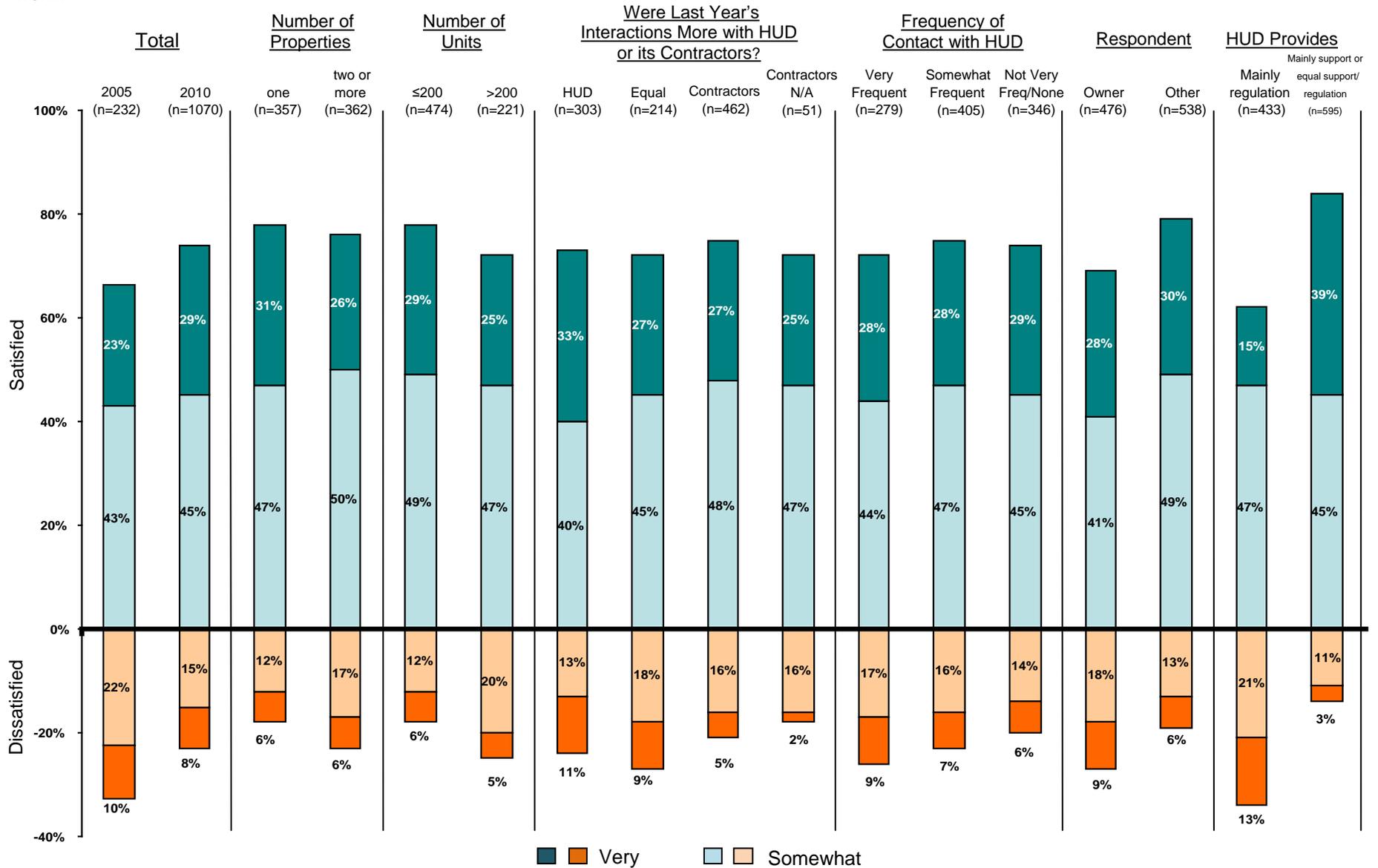
**Question 7g.** How satisfied or dissatisfied are you, in general, with the responsiveness of the people with whom you currently deal at HUD?



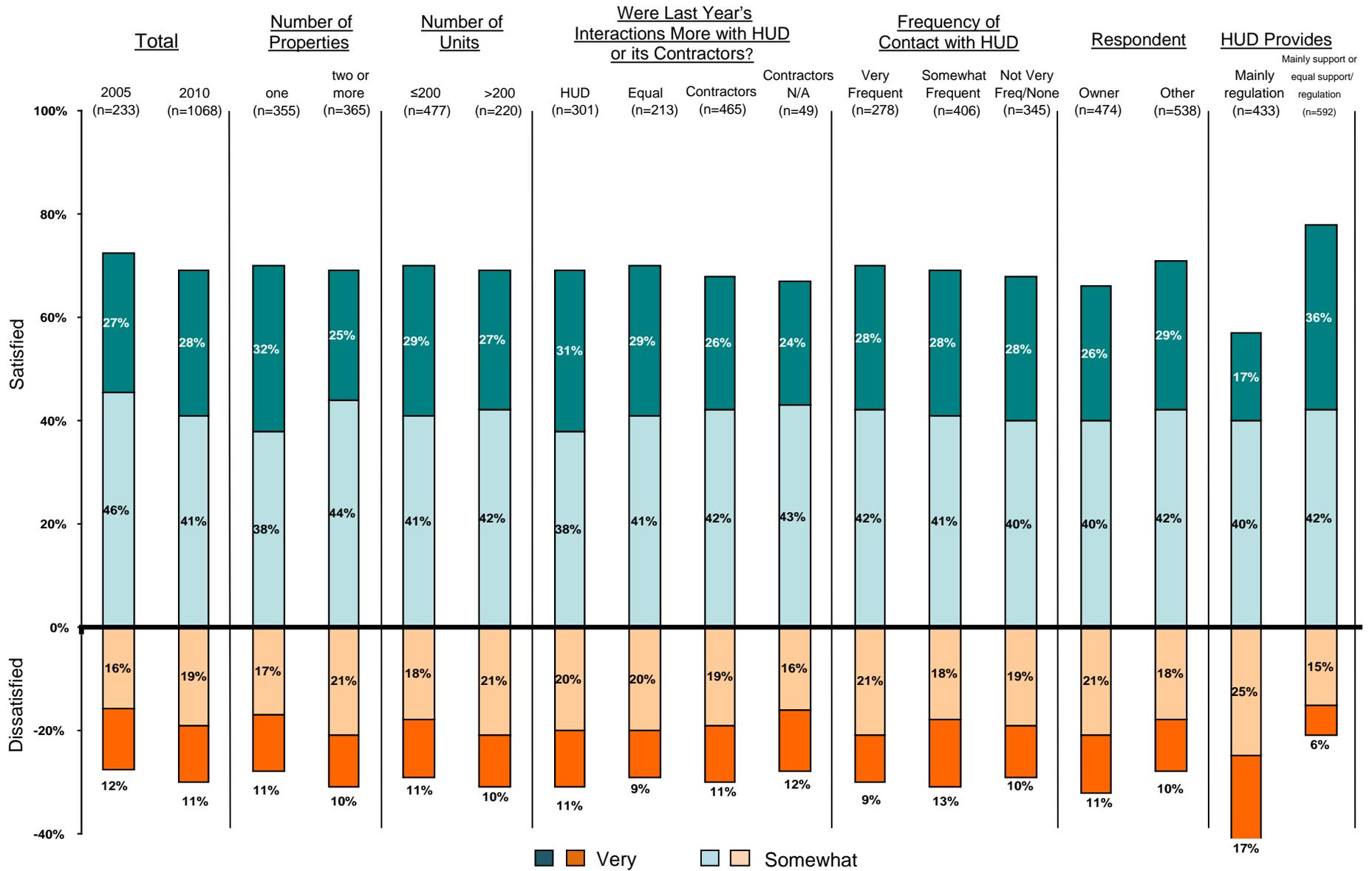
**Question 7h.** How satisfied or dissatisfied are you, in general, with the competence of the people with whom you currently deal at HUD?



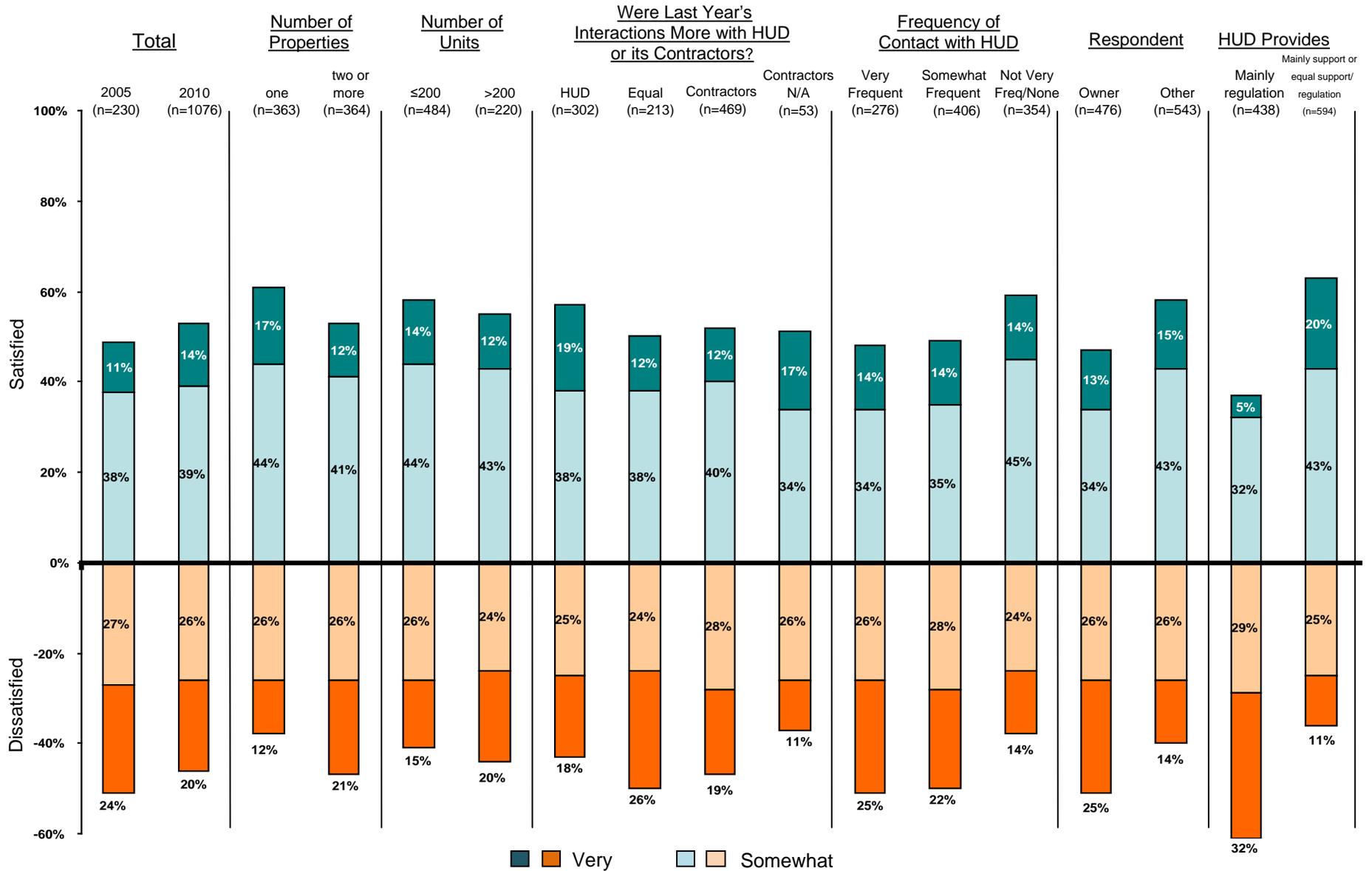
**Question 7i.** How satisfied or dissatisfied are you, in general, with the extent to which HUD employees have the knowledge, skills, and ability to do their work?



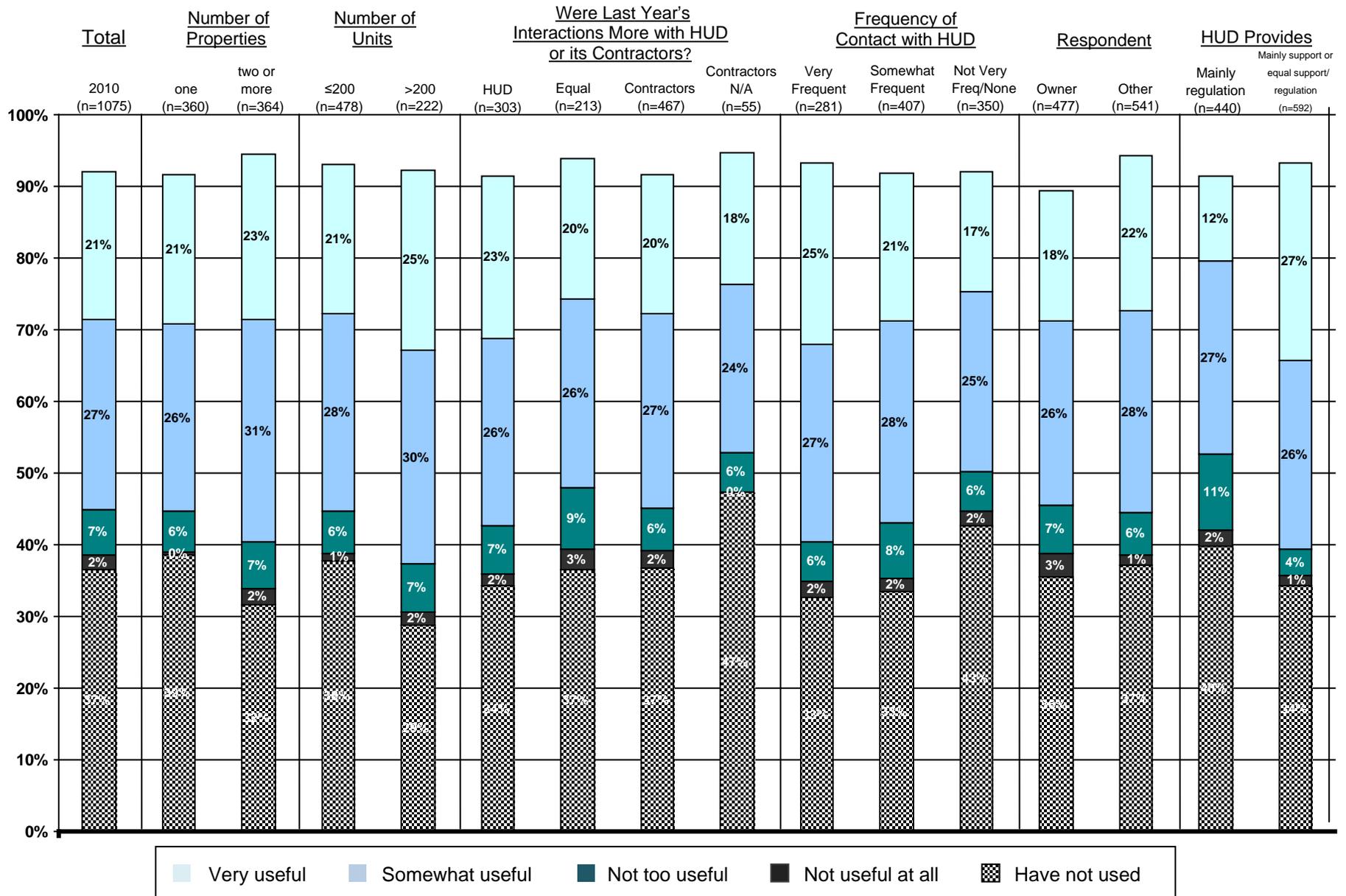
**Question 7j.** How satisfied or dissatisfied are you, in general, with your ability to reach the people at HUD whom you need to contact?



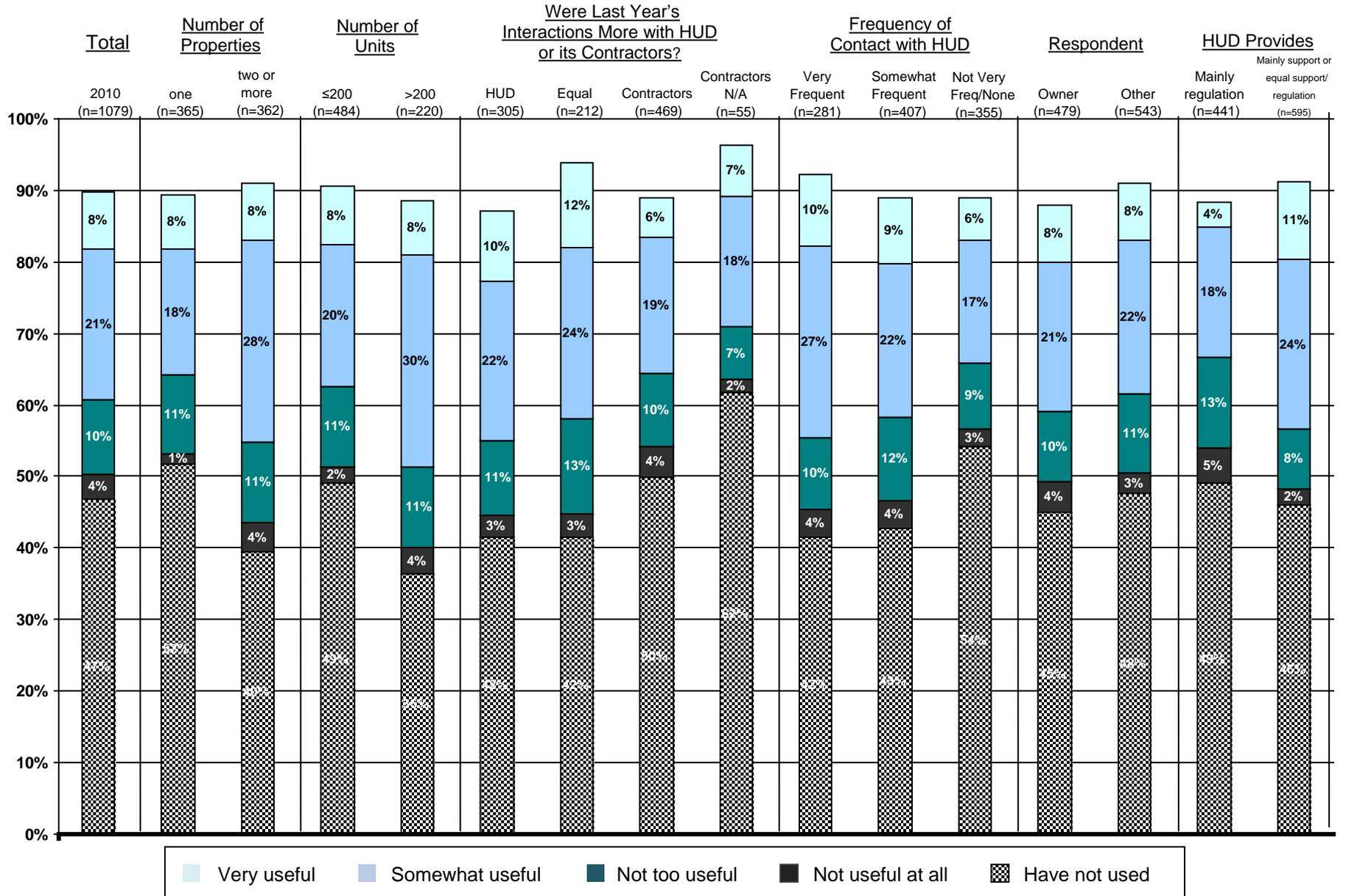
**Question 7k.** How satisfied or dissatisfied are you, in general, with the time commitment needed to comply with HUD reporting requirements?



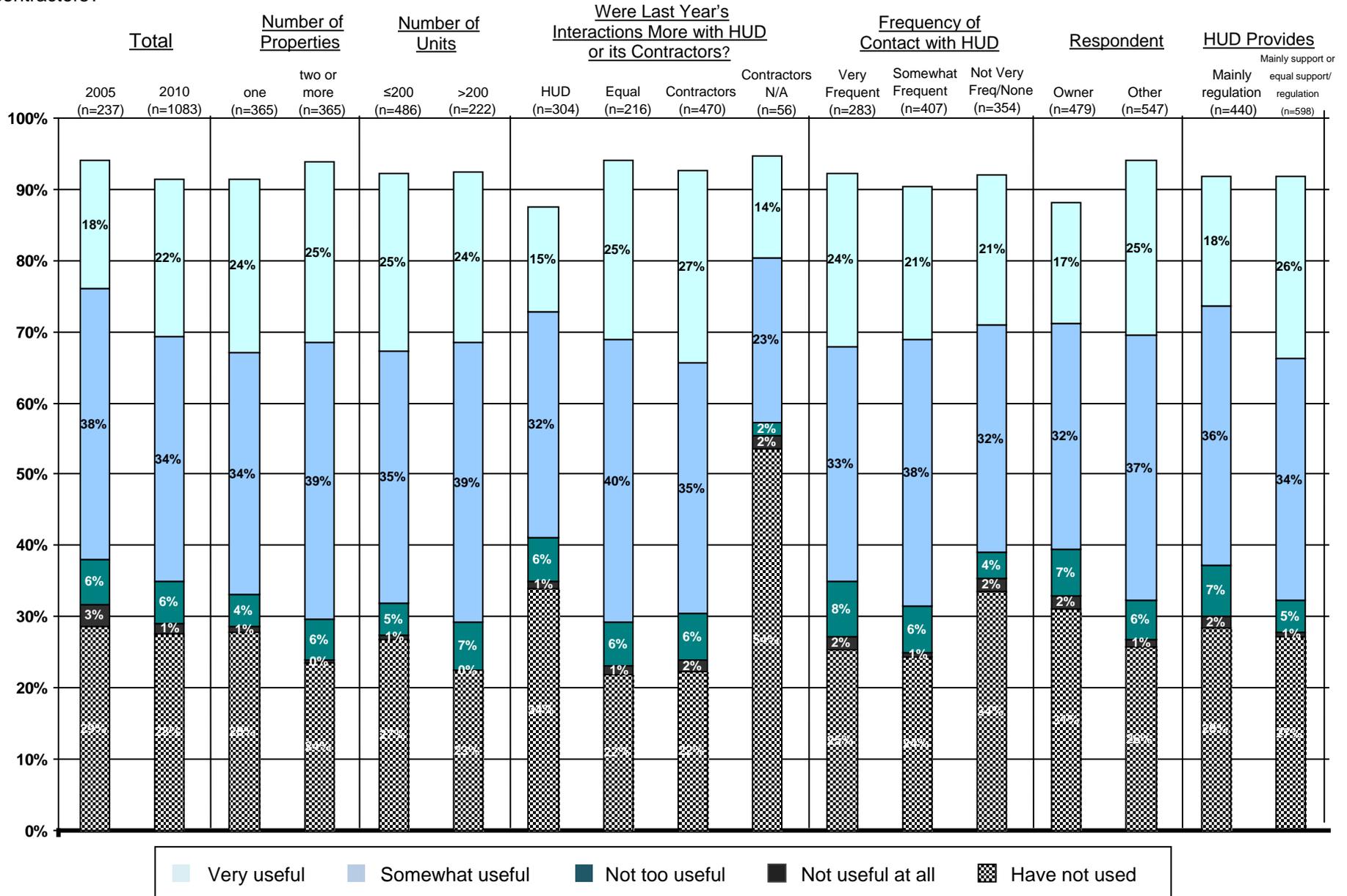
**Question 8a.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored conferences?



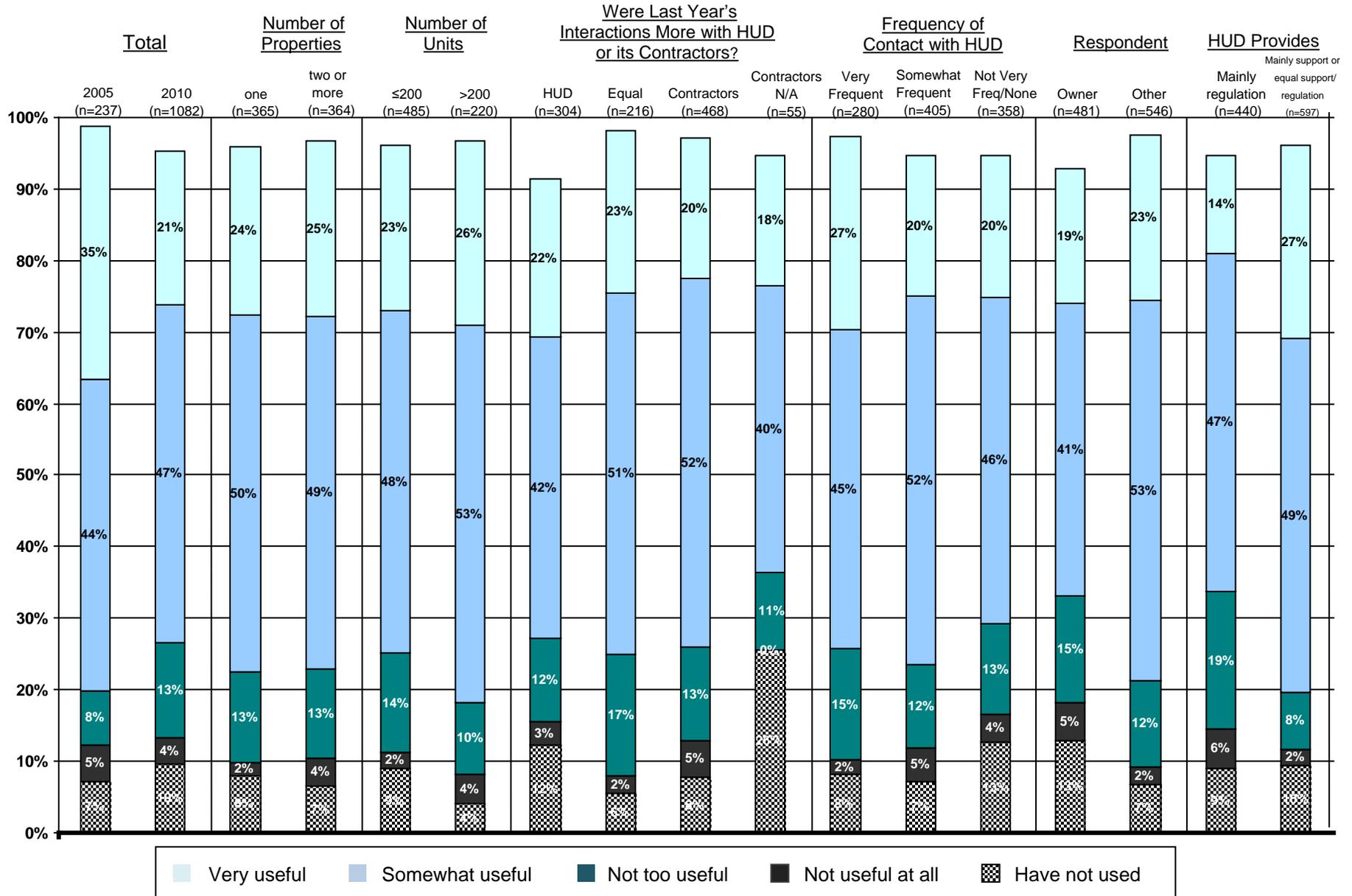
**Question 8b.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored satellite broadcasts?



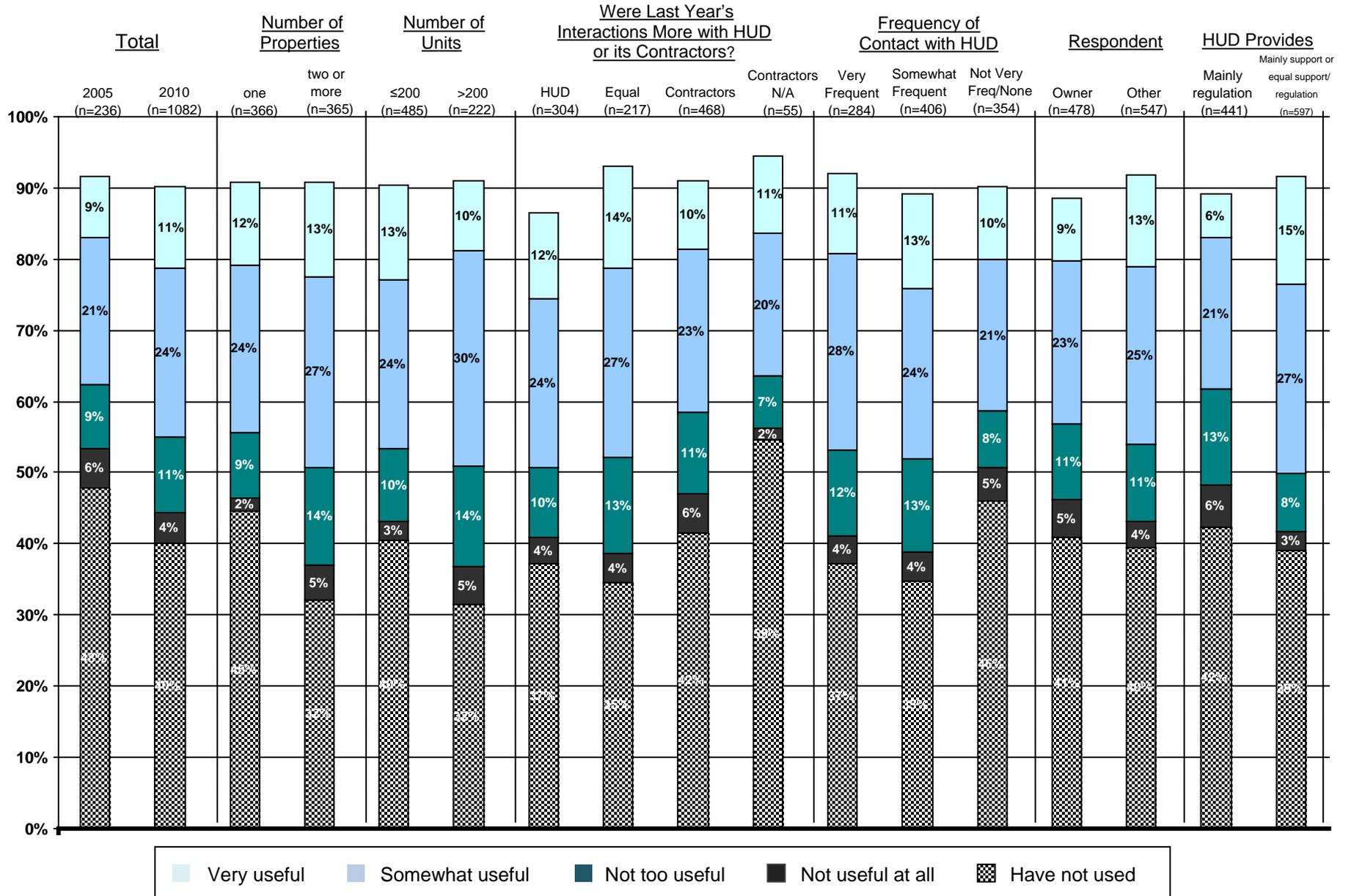
**Question 8c.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored training programs conducted by contractors?



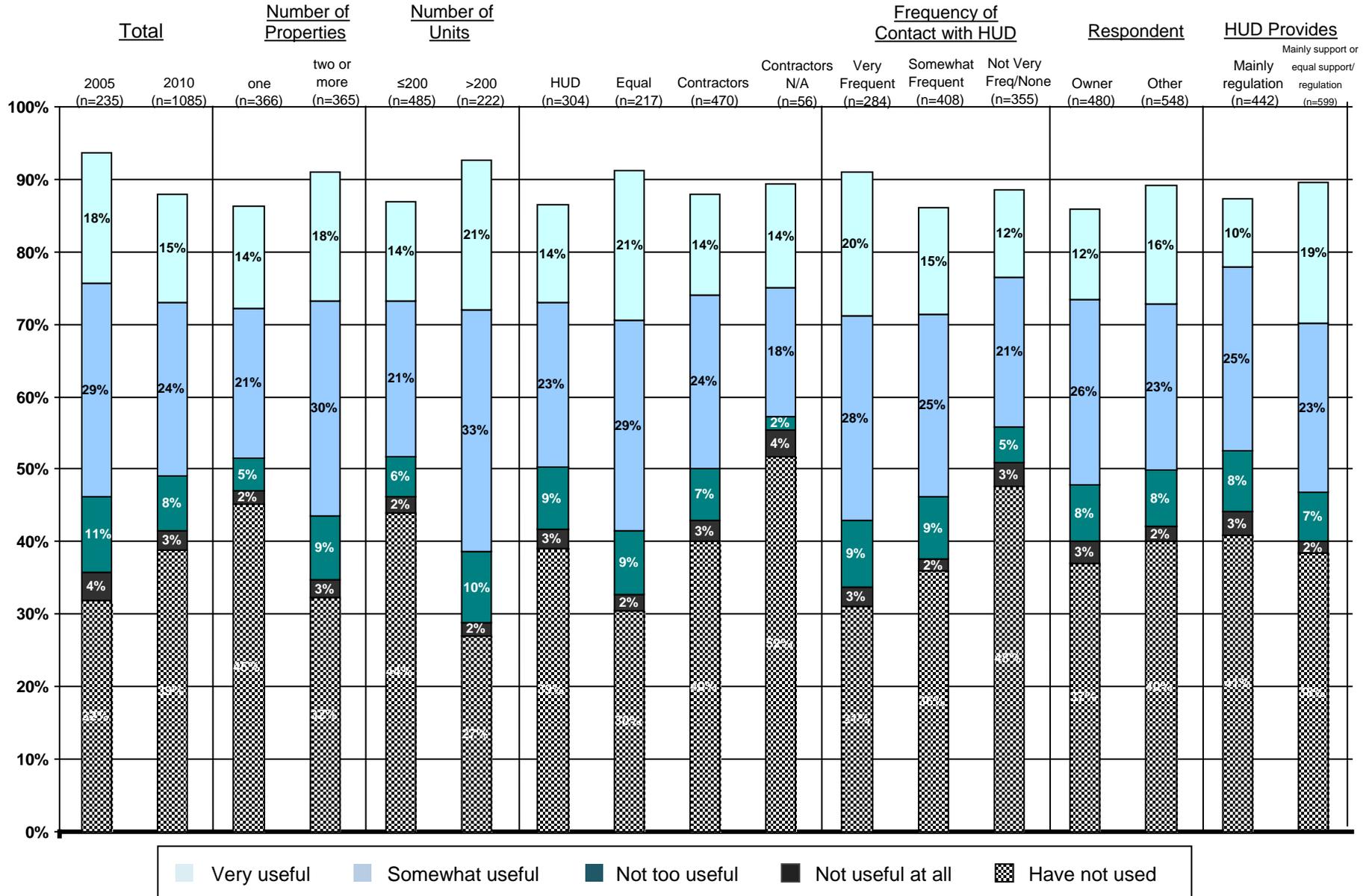
**Question 8d.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webpage?



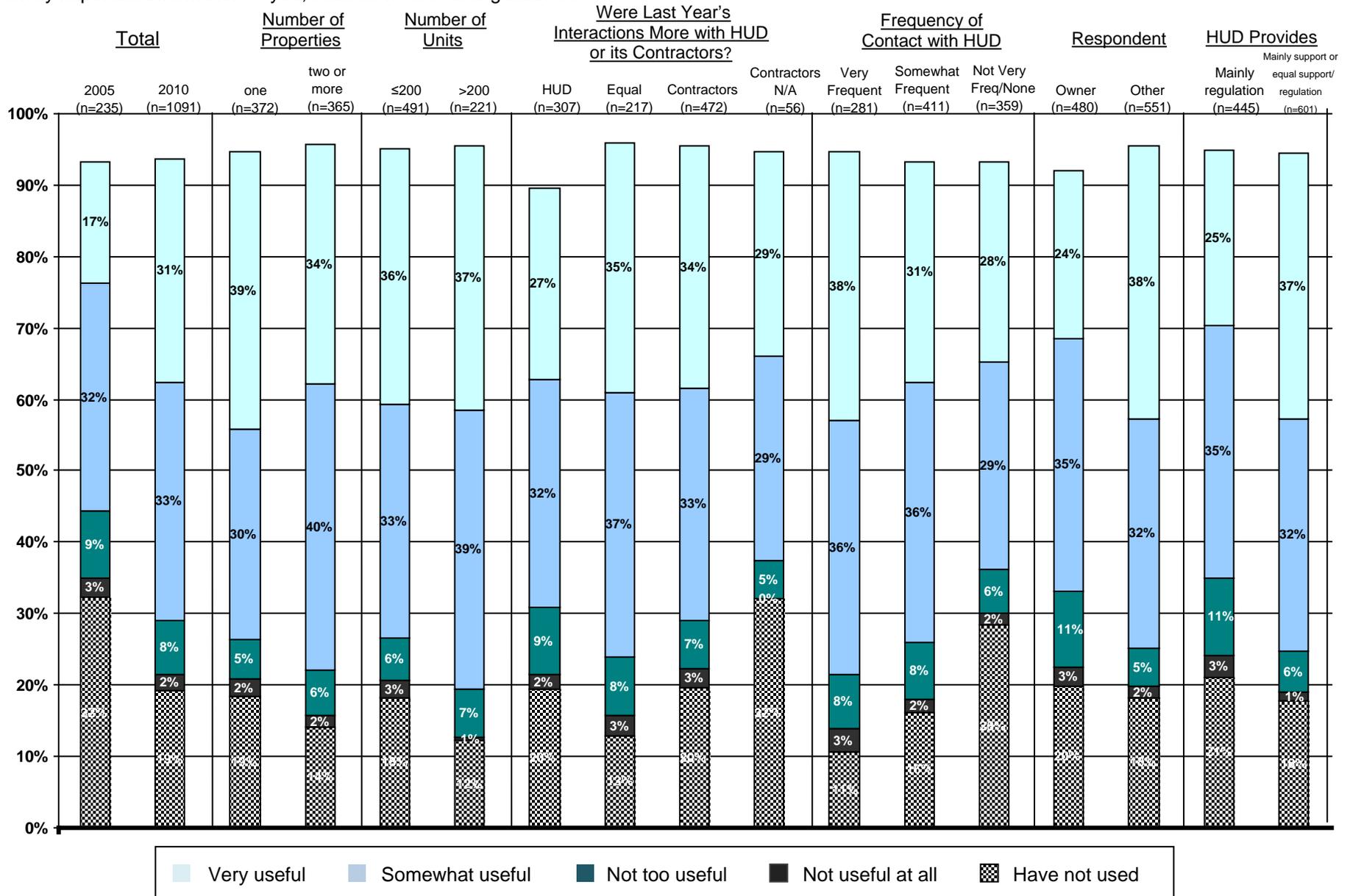
**Question 8e.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webcast training?



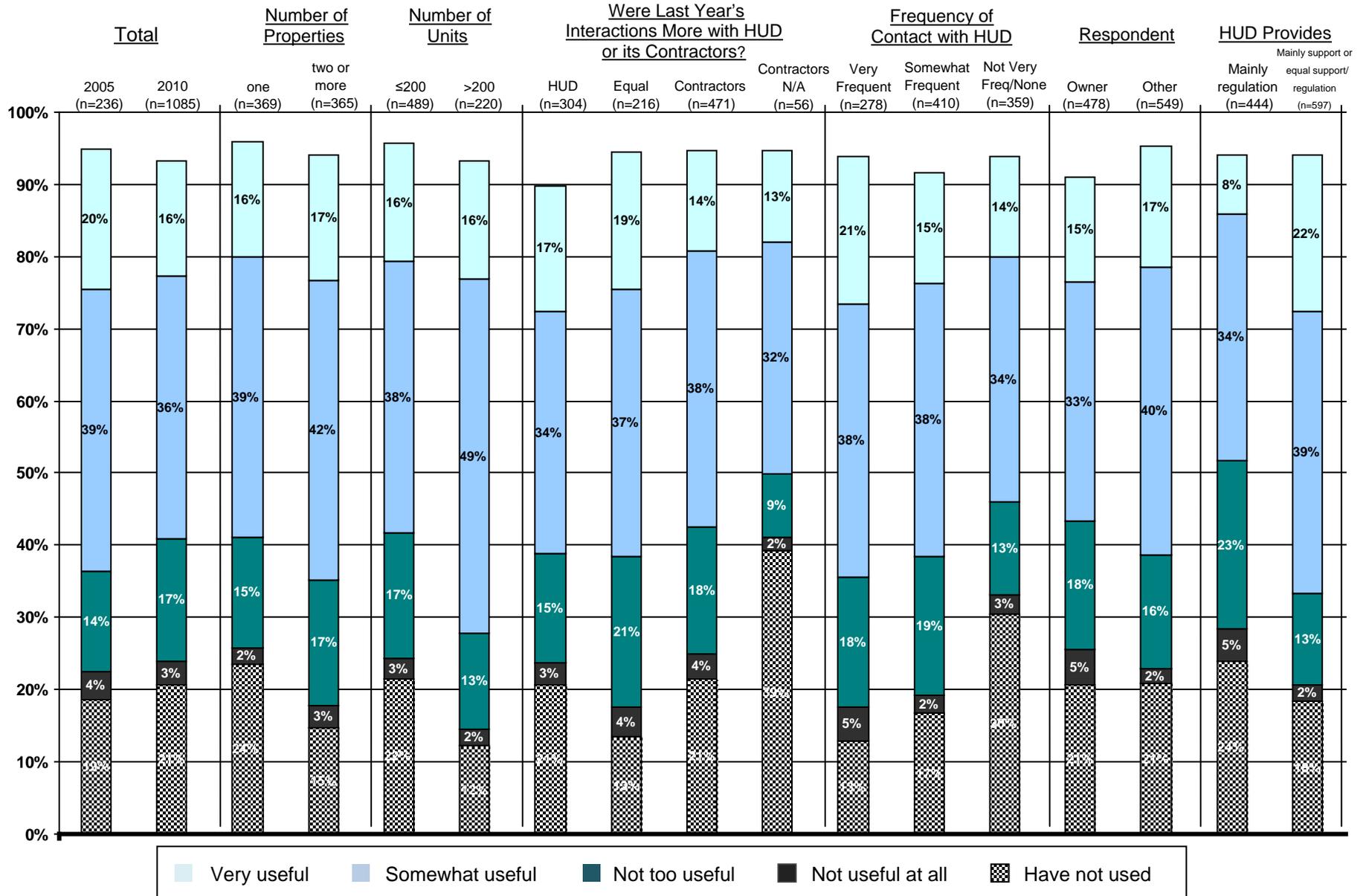
**Question 8f.** How useful or not useful have you found HUD's training and technical assistance through HUD participation in panel discussions and training sessions set up by non-HUD groups?



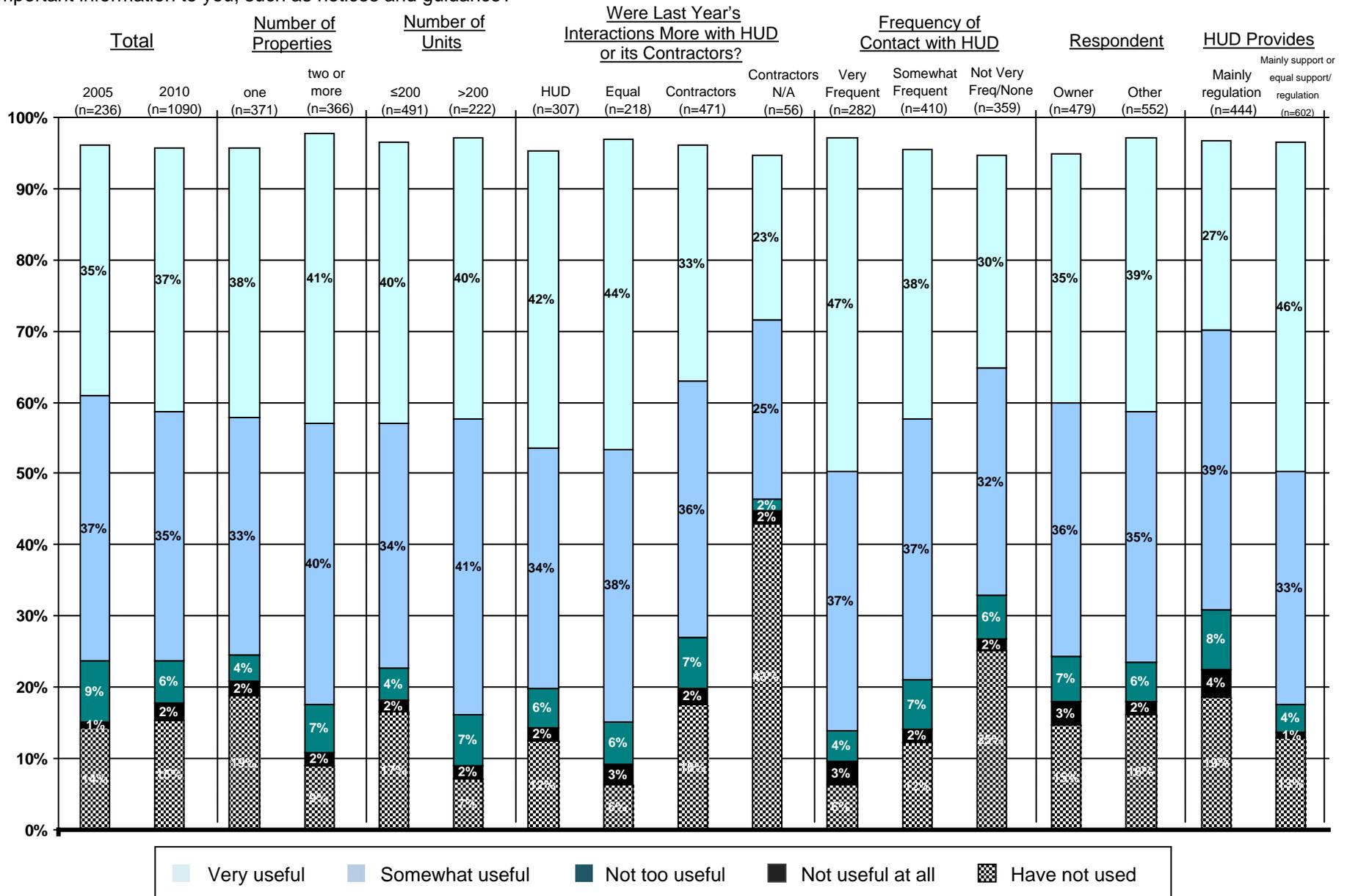
**Question 9a.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD listservs have been as a tool for HUD to convey important information to you, such as notices and guidance?



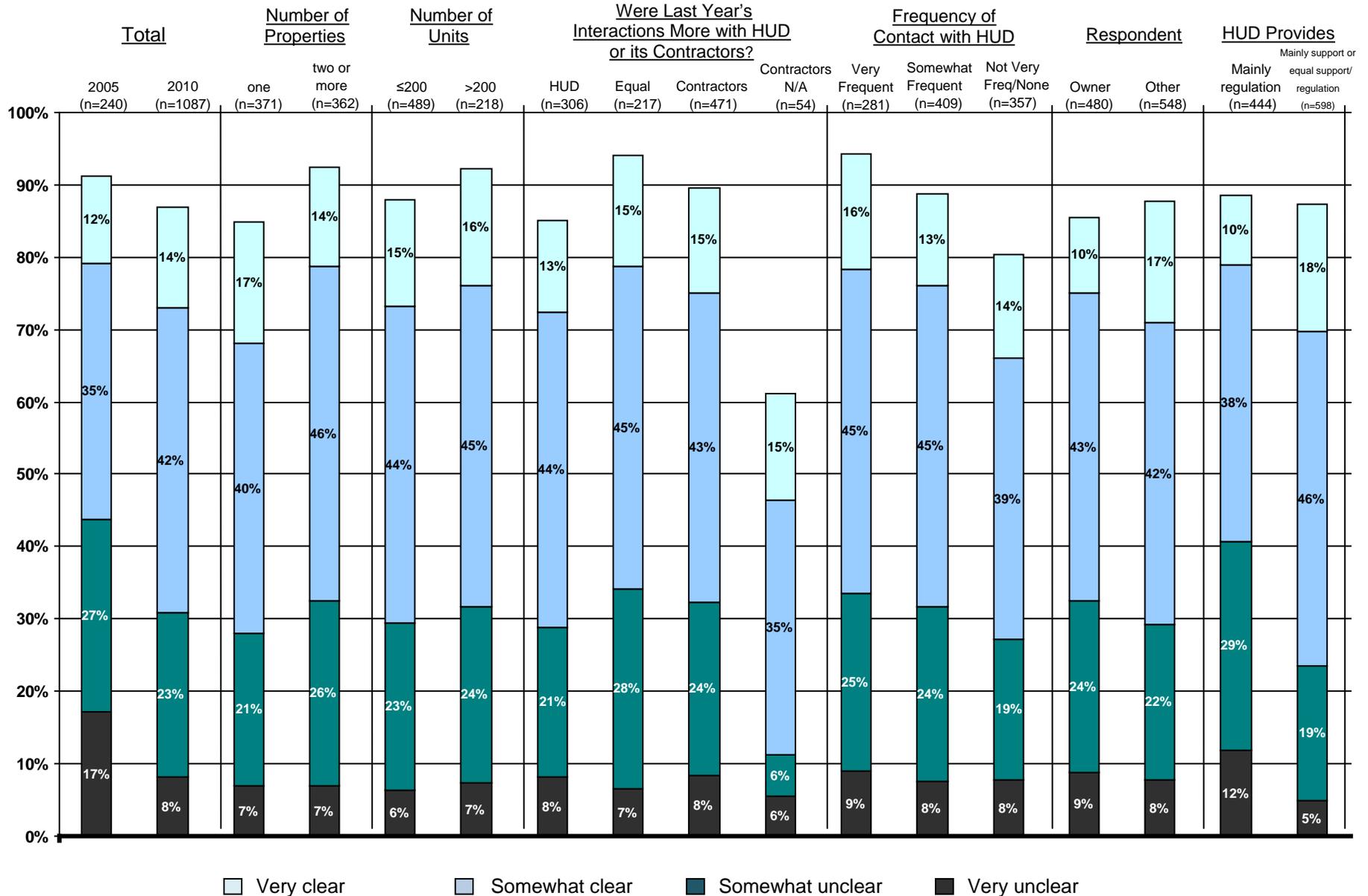
**Question 9b.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD website postings have been as a tool for HUD to convey important information to you, such as notices and guidance?



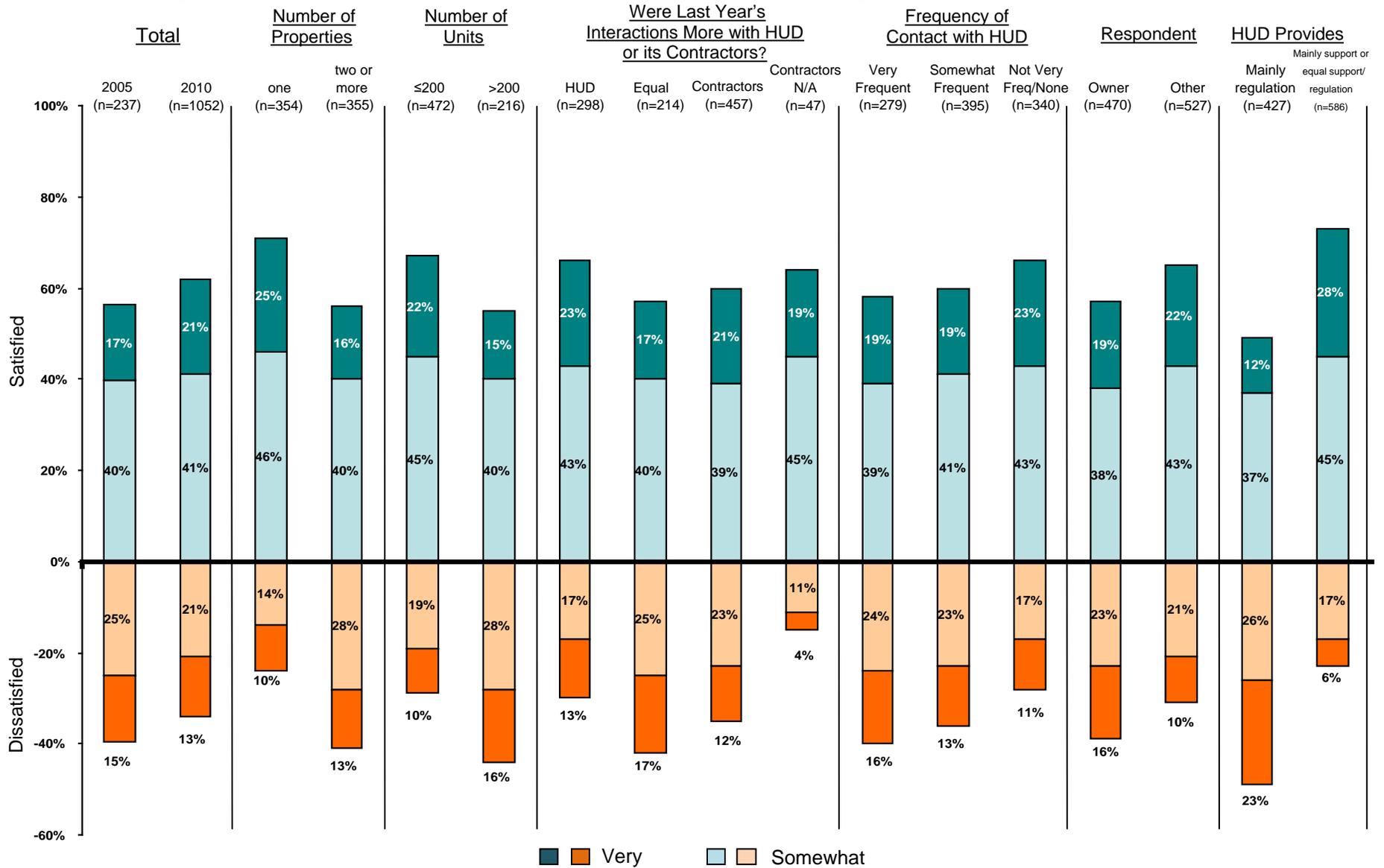
**Question 9c.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD e-mail has been as a tool for HUD to convey important information to you, such as notices and guidance?



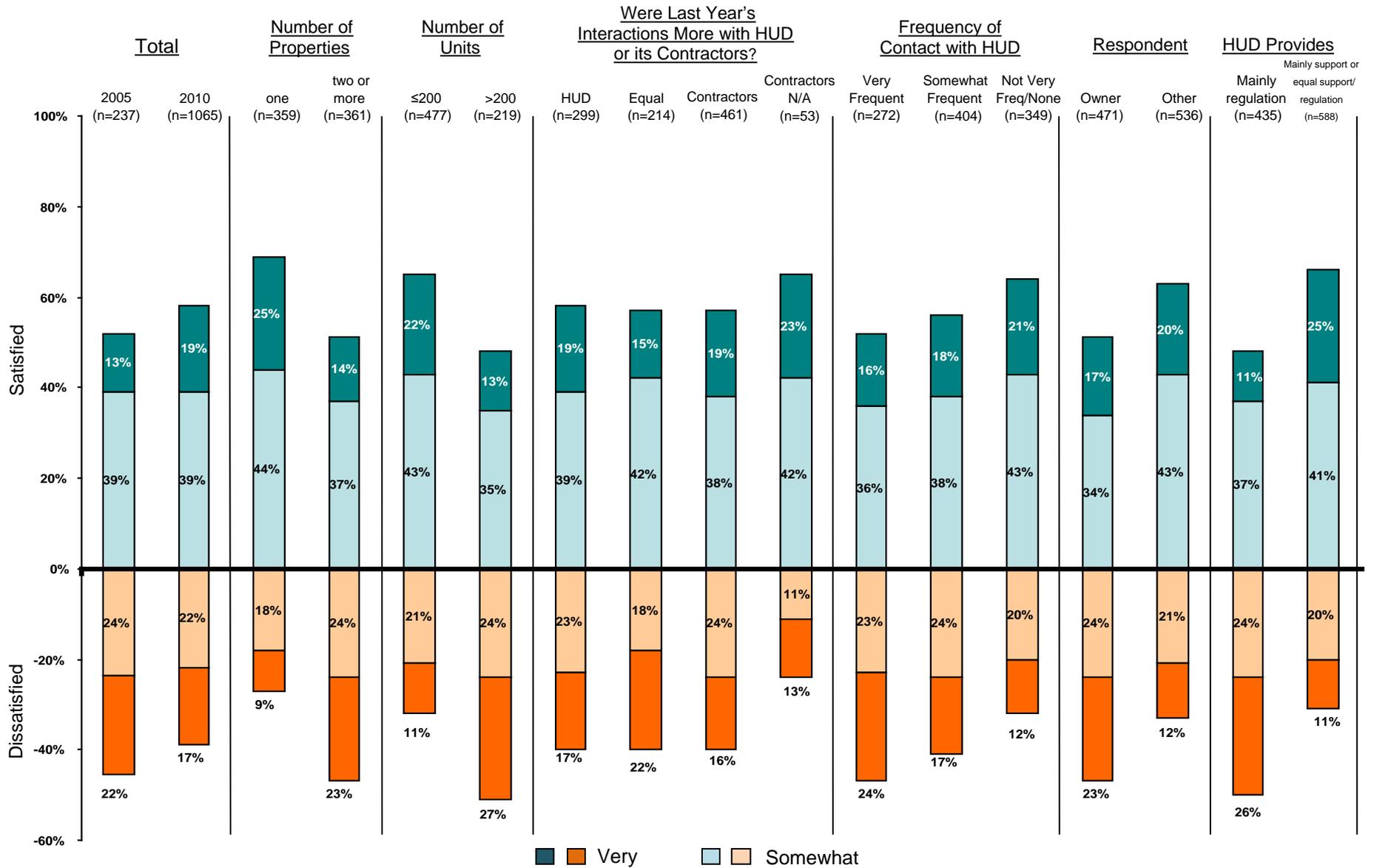
**Question 10.** Property owners may work with multiple HUD offices, hubs, centers, and performance-based contractor administrators (PBCAs) for various purposes. How clear or unclear are the different functions and responsibilities of these offices, hubs, centers, and PBCAs?



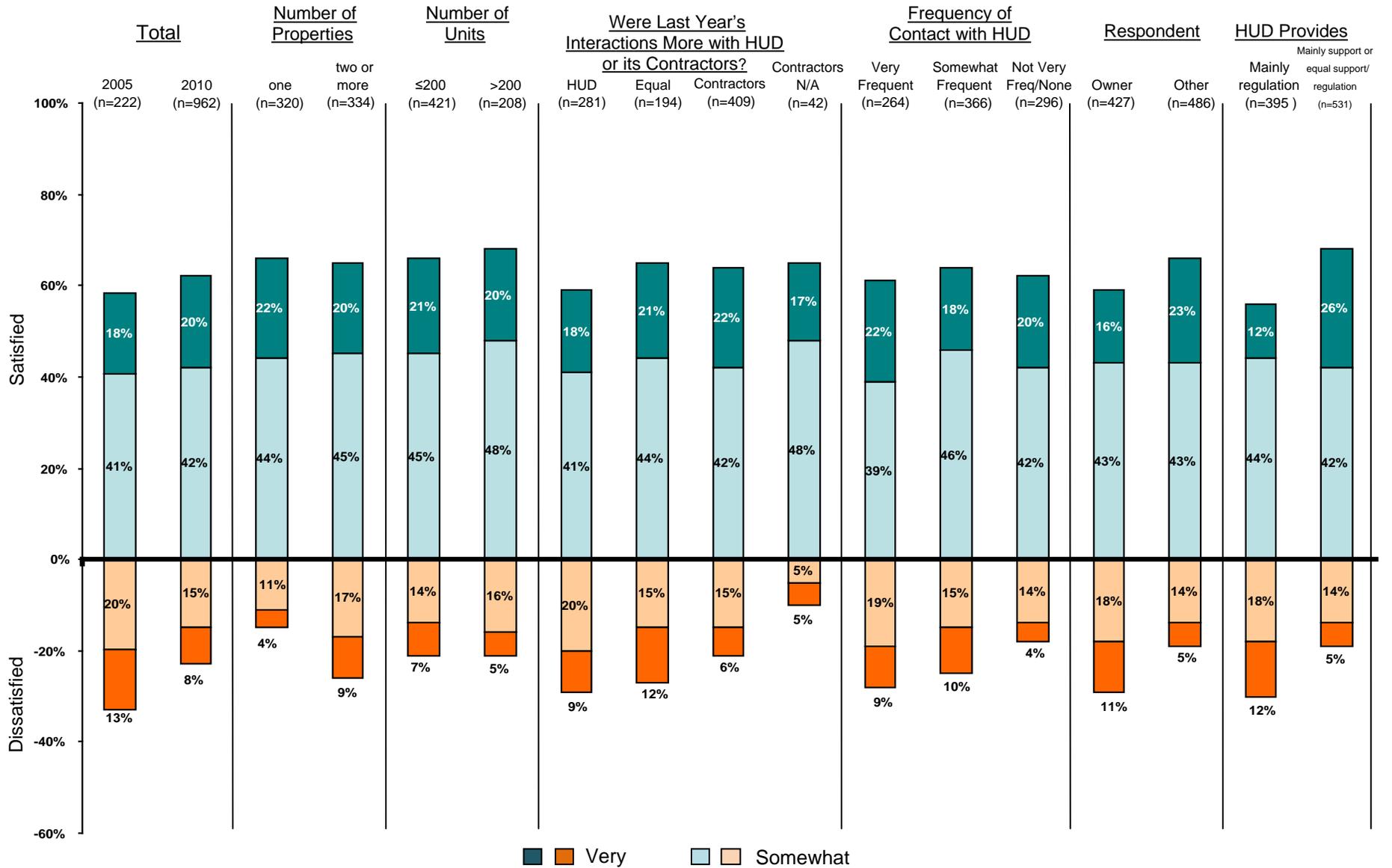
**Question 11a.** How satisfied or dissatisfied are you with the ability of HUD field office personnel—those in the multifamily hubs and program centers, and contractors working on behalf of HUD (such as PBCAs)—to consistently interpret policies and regulations that pertain to your properties?



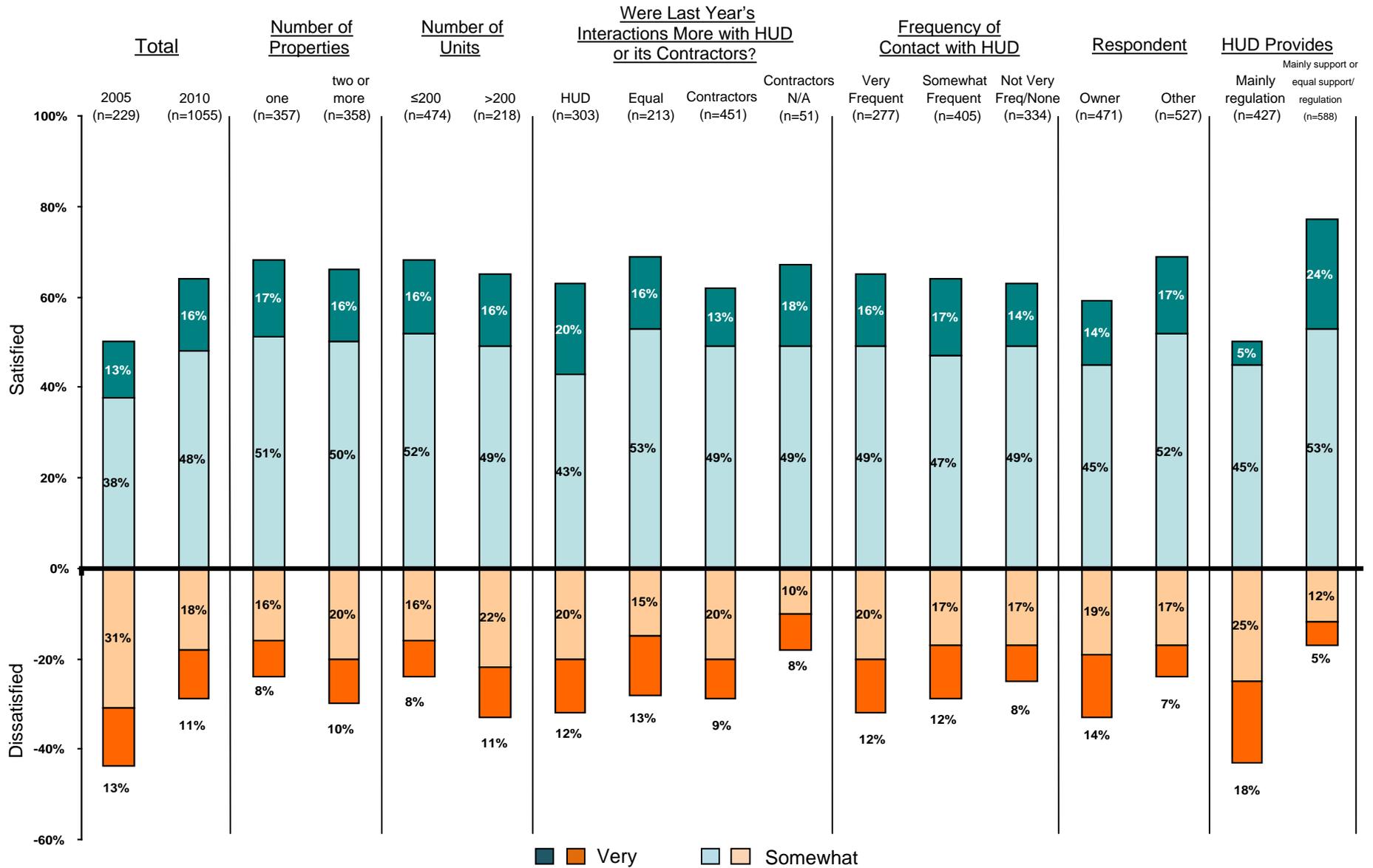
**Question 11b.** How satisfied or dissatisfied are you with the physical inspections by HUD's Real Estate Assessment Center (REAC)?



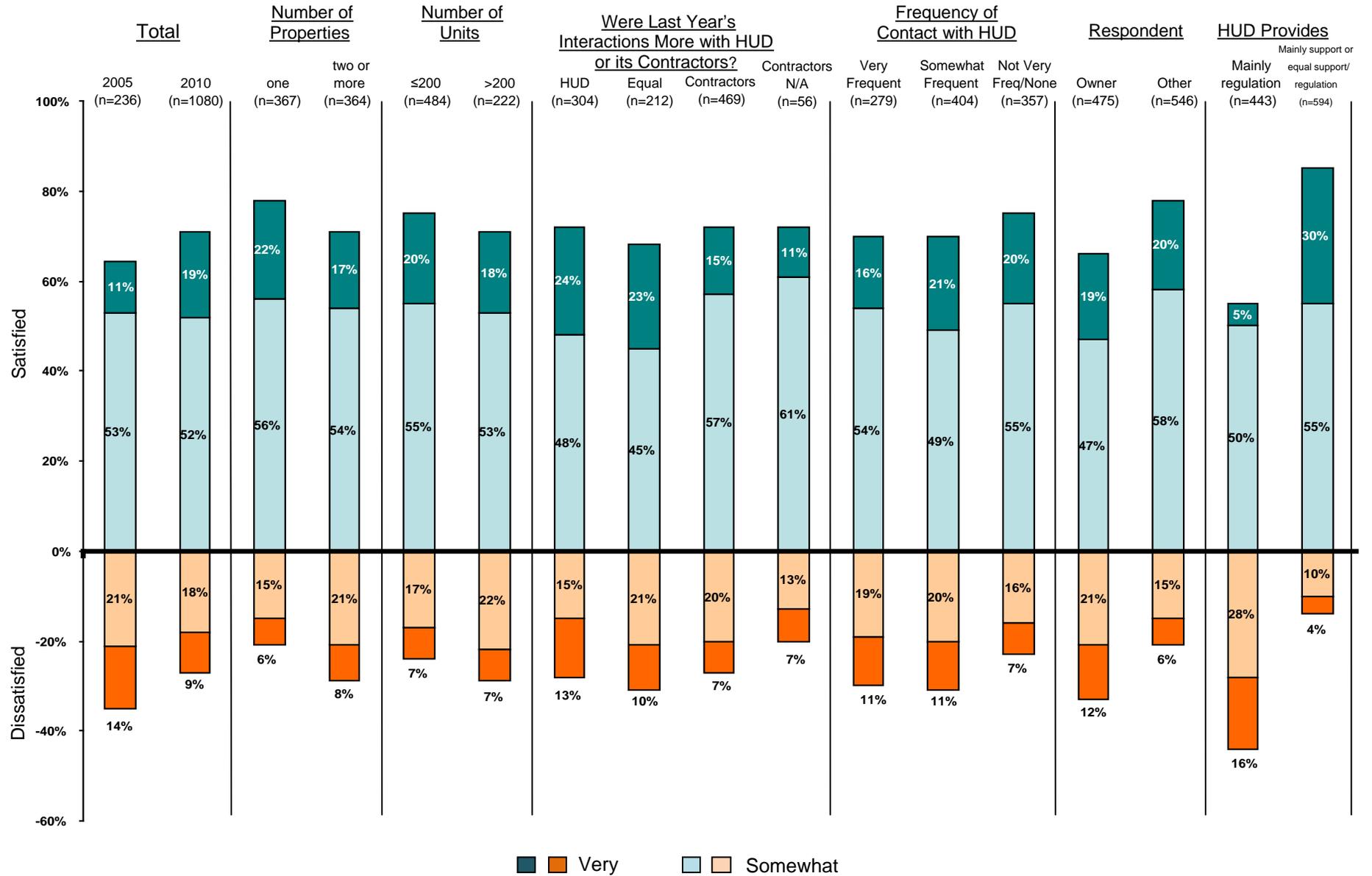
Question 11c. How satisfied or dissatisfied are you with electronic financial reporting to REAC?



**Question 11d.** How satisfied or dissatisfied are you with HUD's capacity to monitor and provide oversight related to your property or properties?

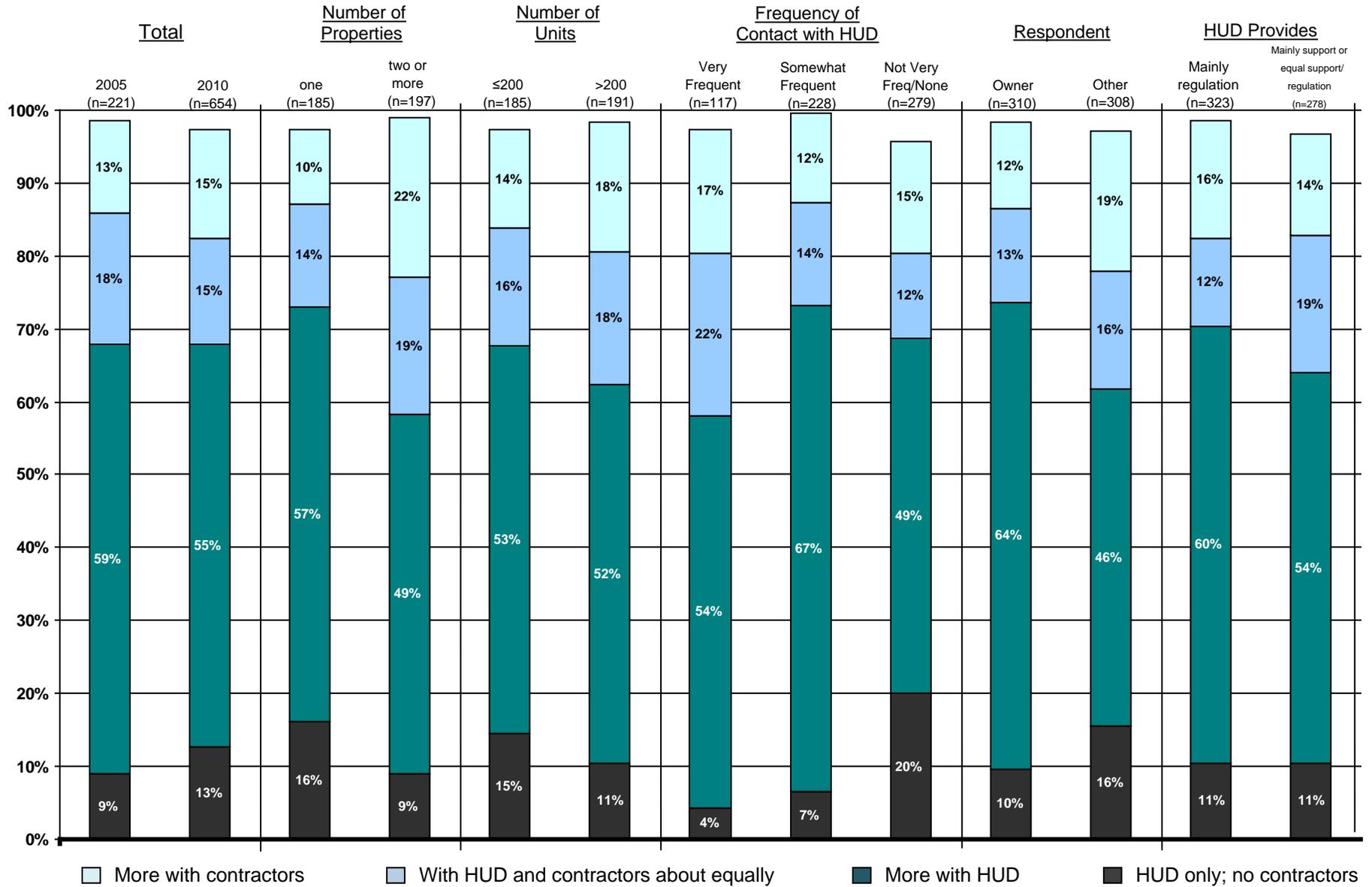


**Question 12.** At present, taking everything into consideration, how satisfied or dissatisfied are you with HUD's overall performance?

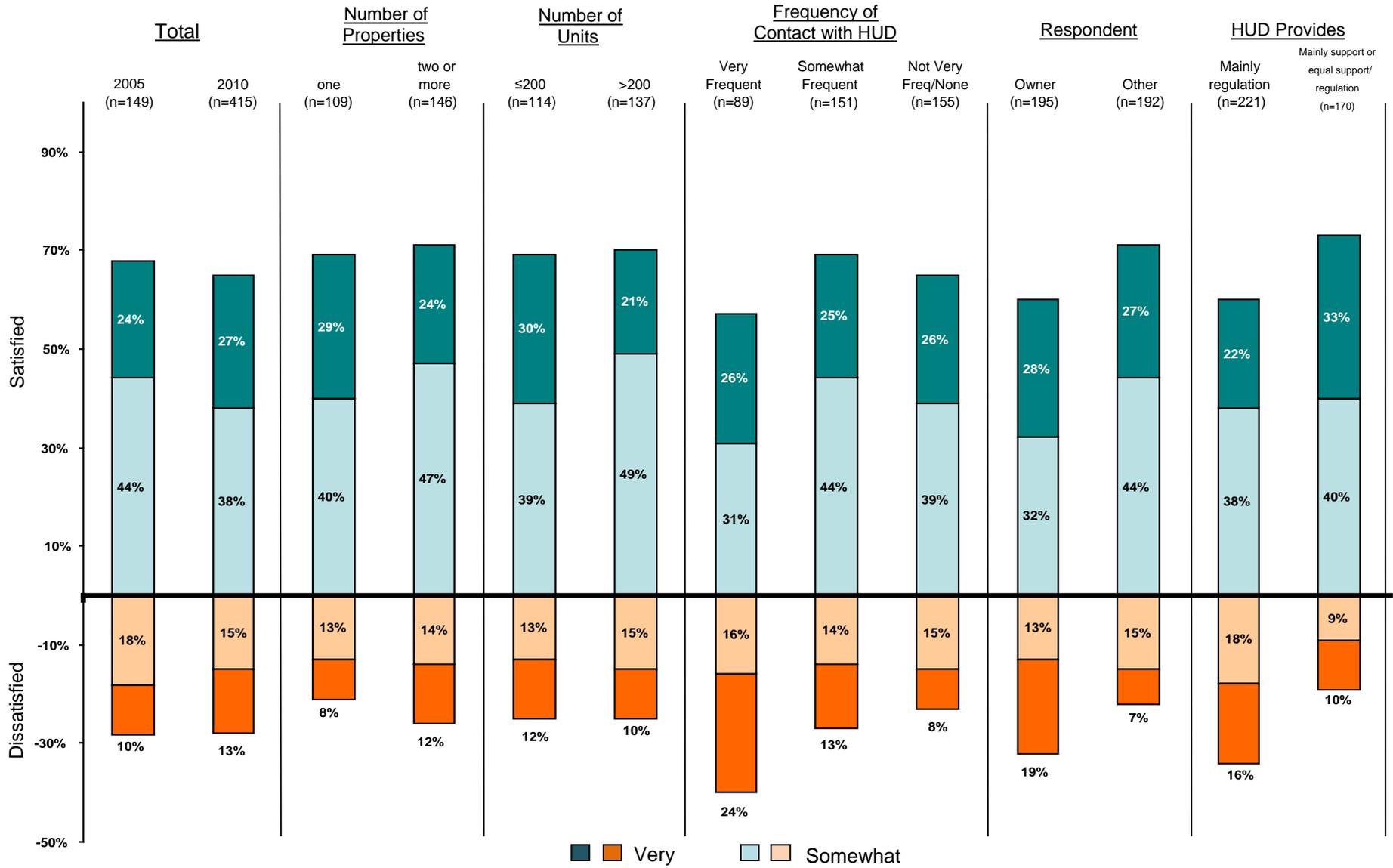


**B. HUD-INSURED OWNERS**

**Question 3.** During the past twelve months, when you interacted with HUD, were your dealings more with HUD, or were they more with HUD's contractors/third-party contractors?

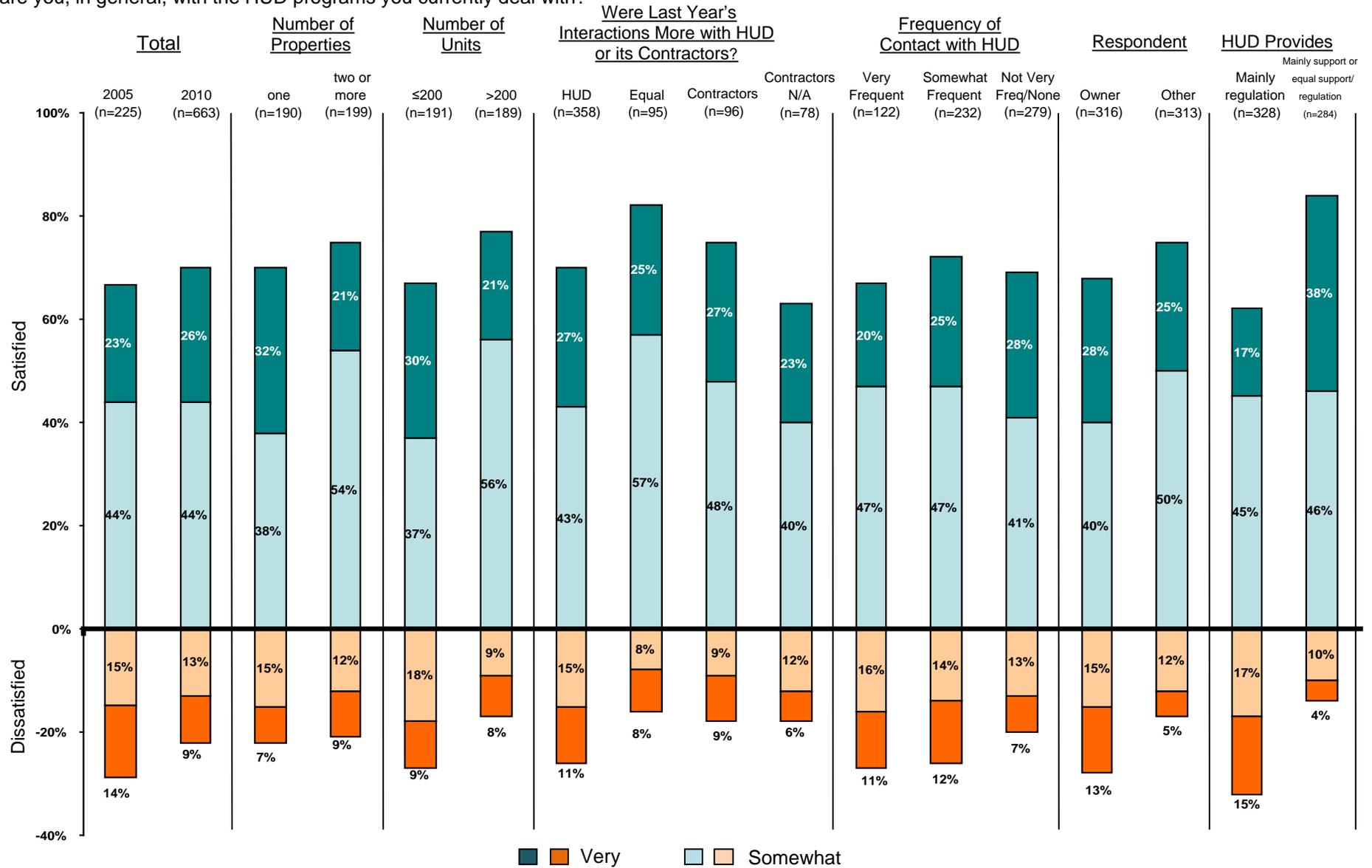


**Question 4.** Overall, taking everything into consideration, how satisfied or dissatisfied are you with the service provided by HUD's contractors/third-party contractors?

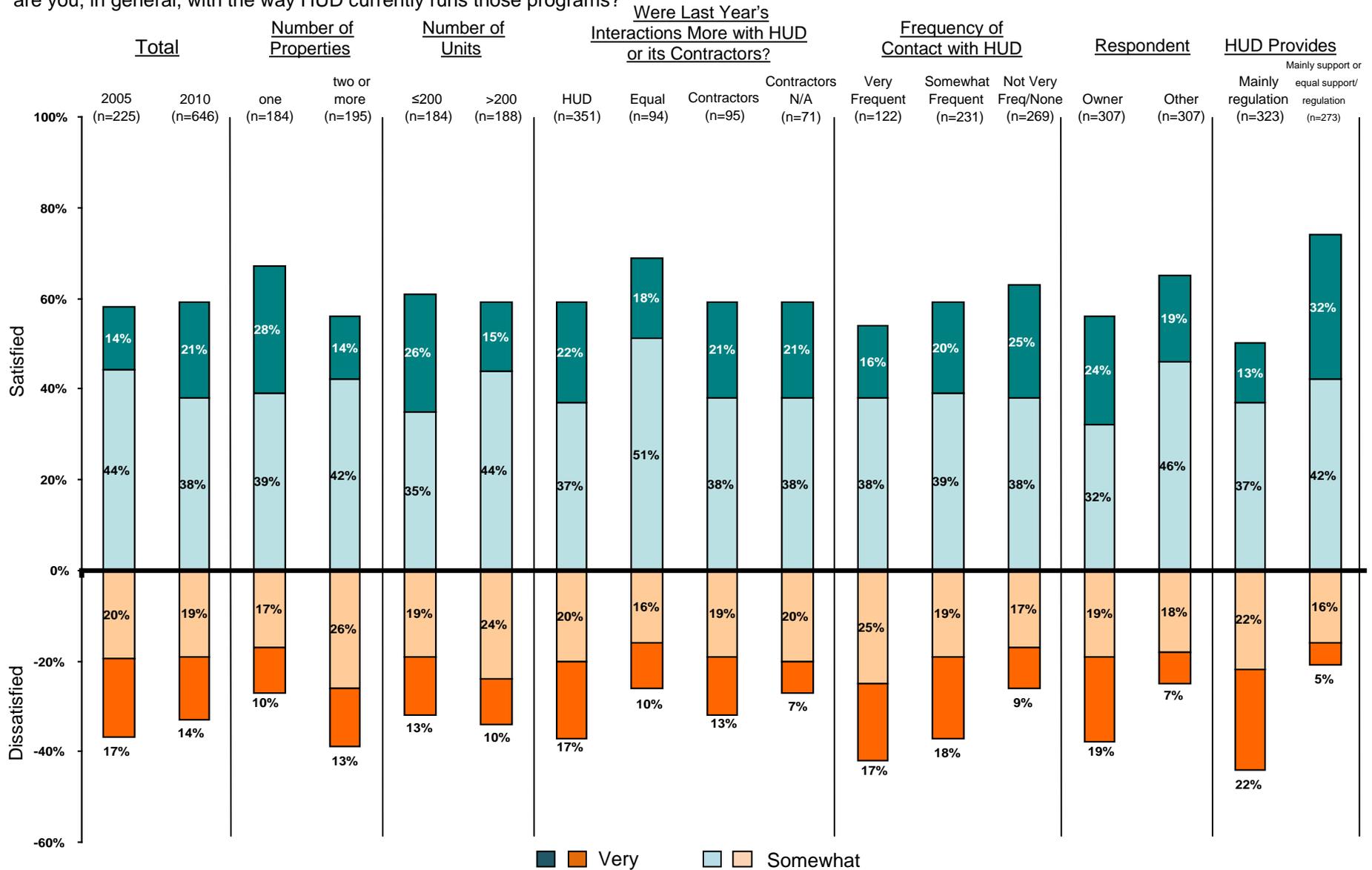


This chart excludes the 83 organizations that said they do not deal with HUD's contractors.

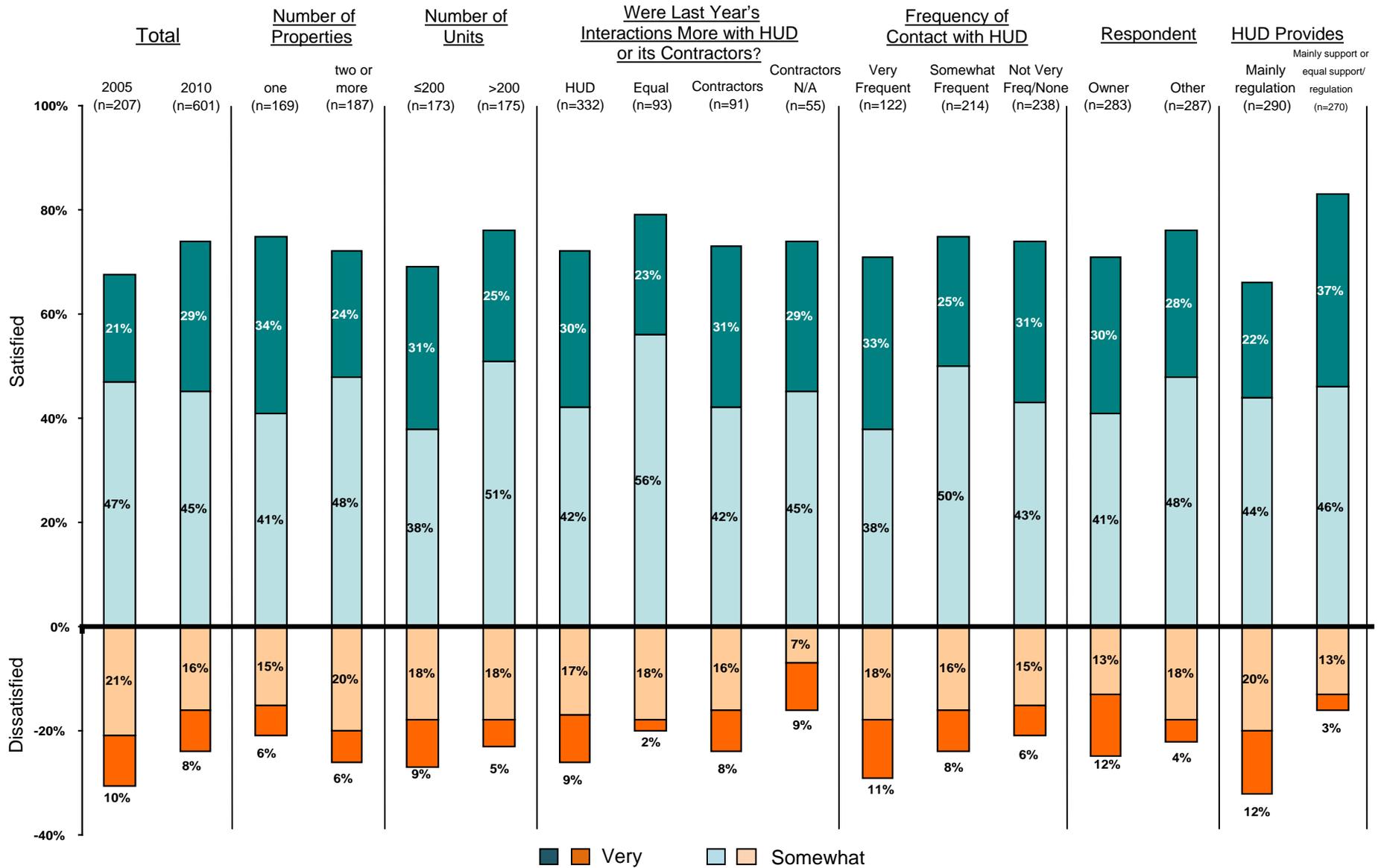
**Question 6a.** Thinking first about HUD programs with which you currently deal and then about how HUD runs those programs, how satisfied or dissatisfied are you, in general, with the HUD programs you currently deal with?



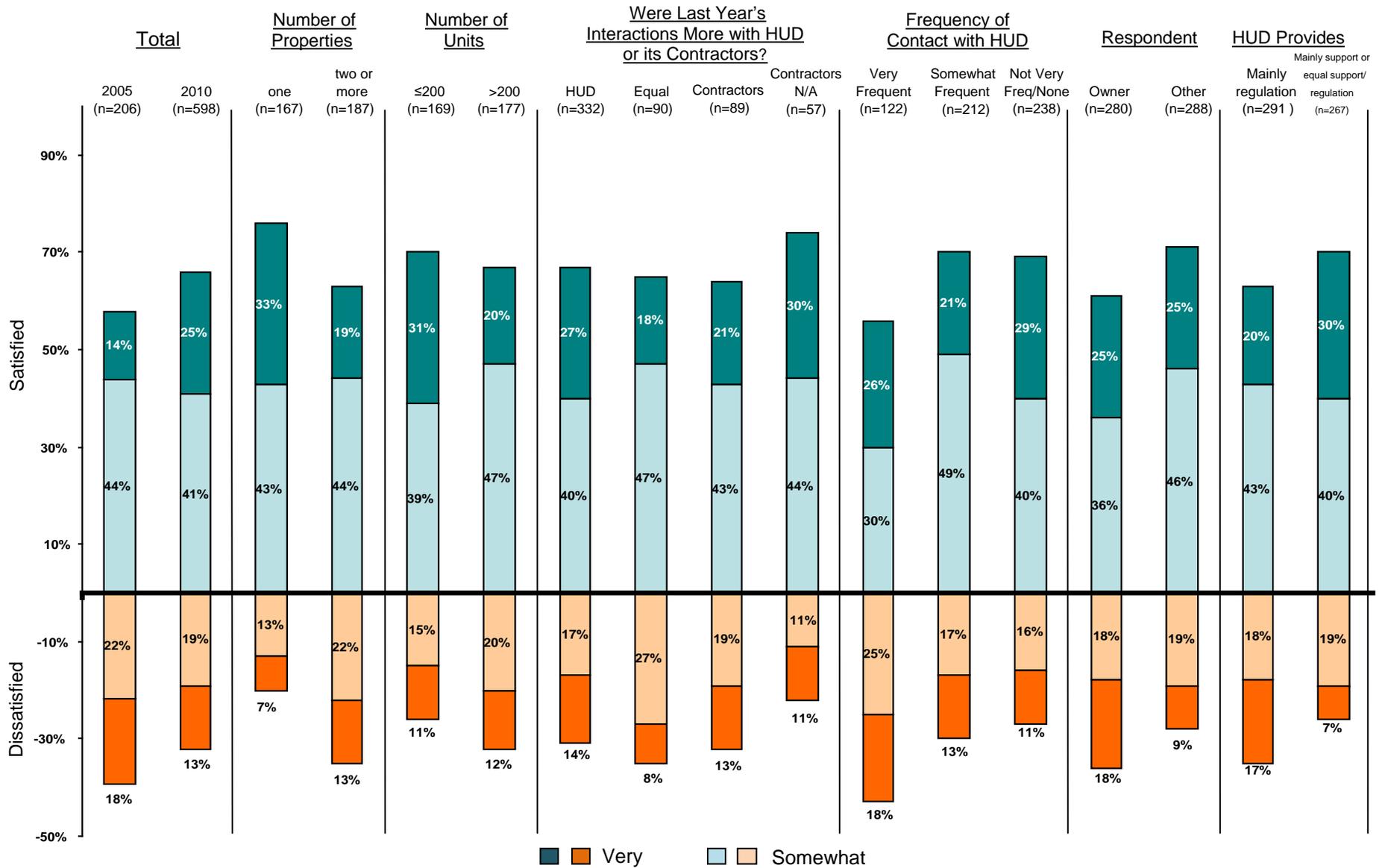
**Question 6b.** Thinking first about HUD programs with which you currently deal and then about how HUD runs those programs, how satisfied or dissatisfied are you, in general, with the way HUD currently runs those programs?



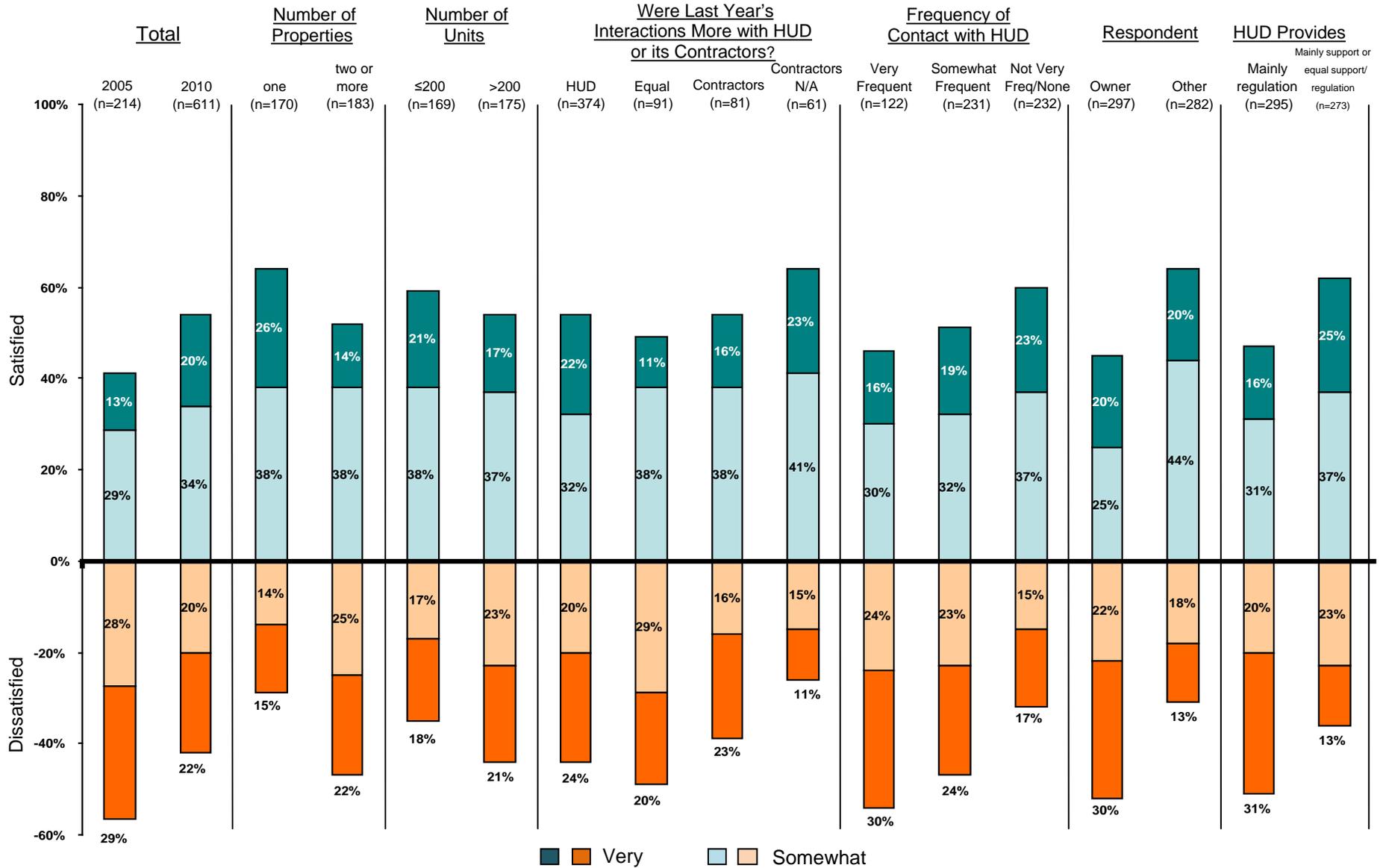
**Question 7a.** How satisfied or dissatisfied are you, in general, with the quality of the information you currently receive from HUD?



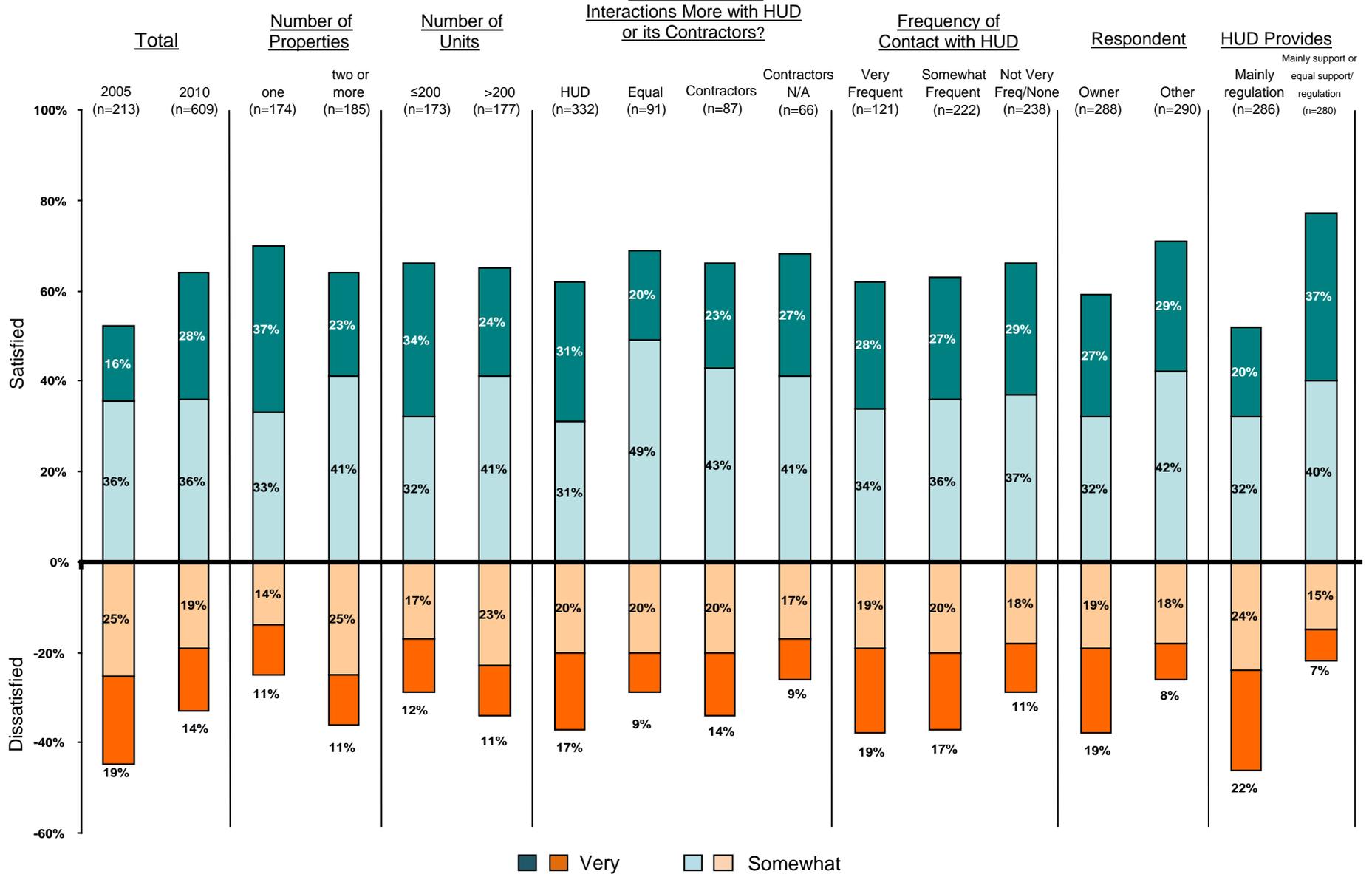
**Question 7b.** How satisfied or dissatisfied are you, in general, with the timeliness of the information you currently receive from HUD?



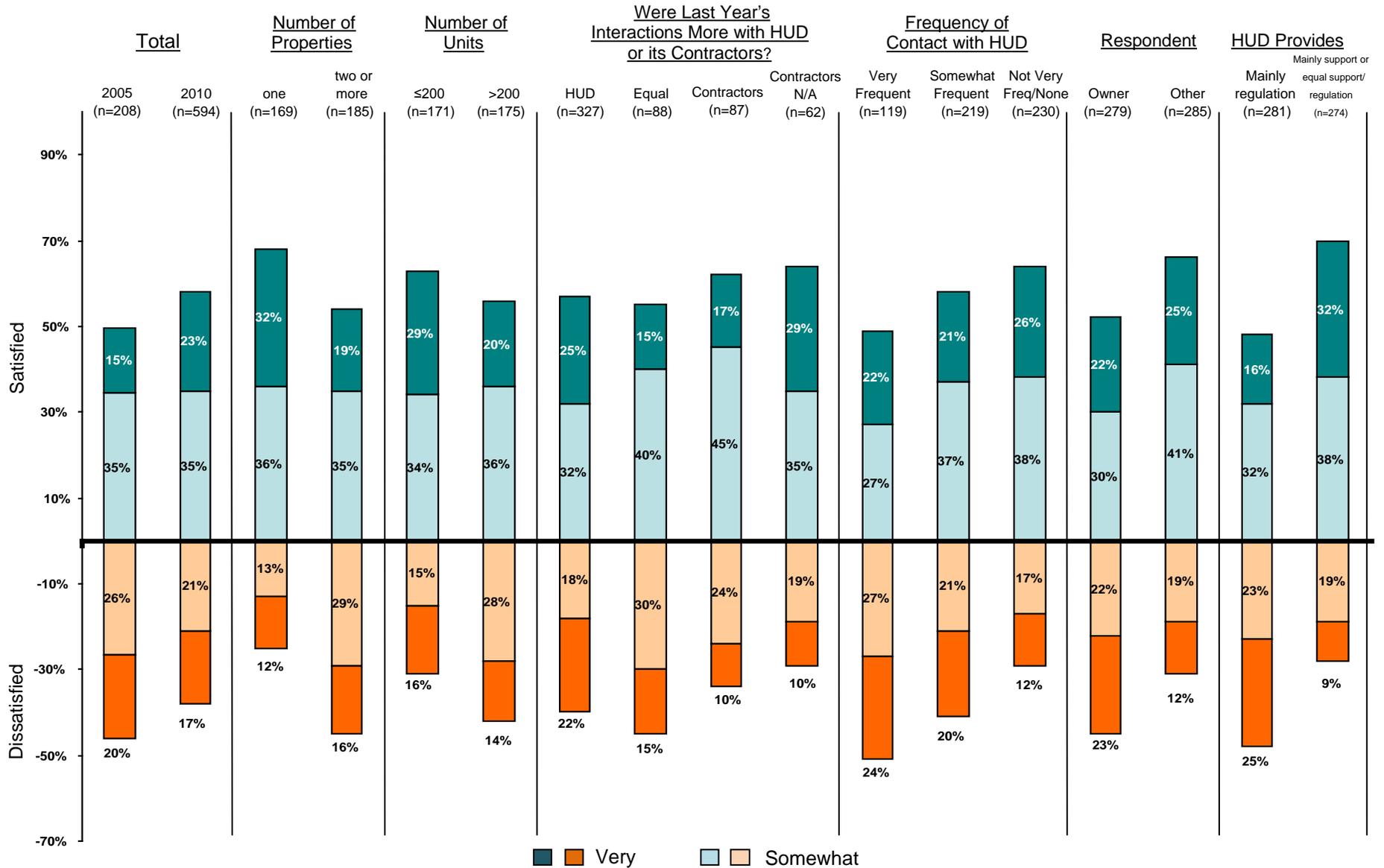
**Question 7c.** How satisfied or dissatisfied are you, in general, with the timeliness of decision-making by HUD (such as requests for waivers, rulings, and approvals)?



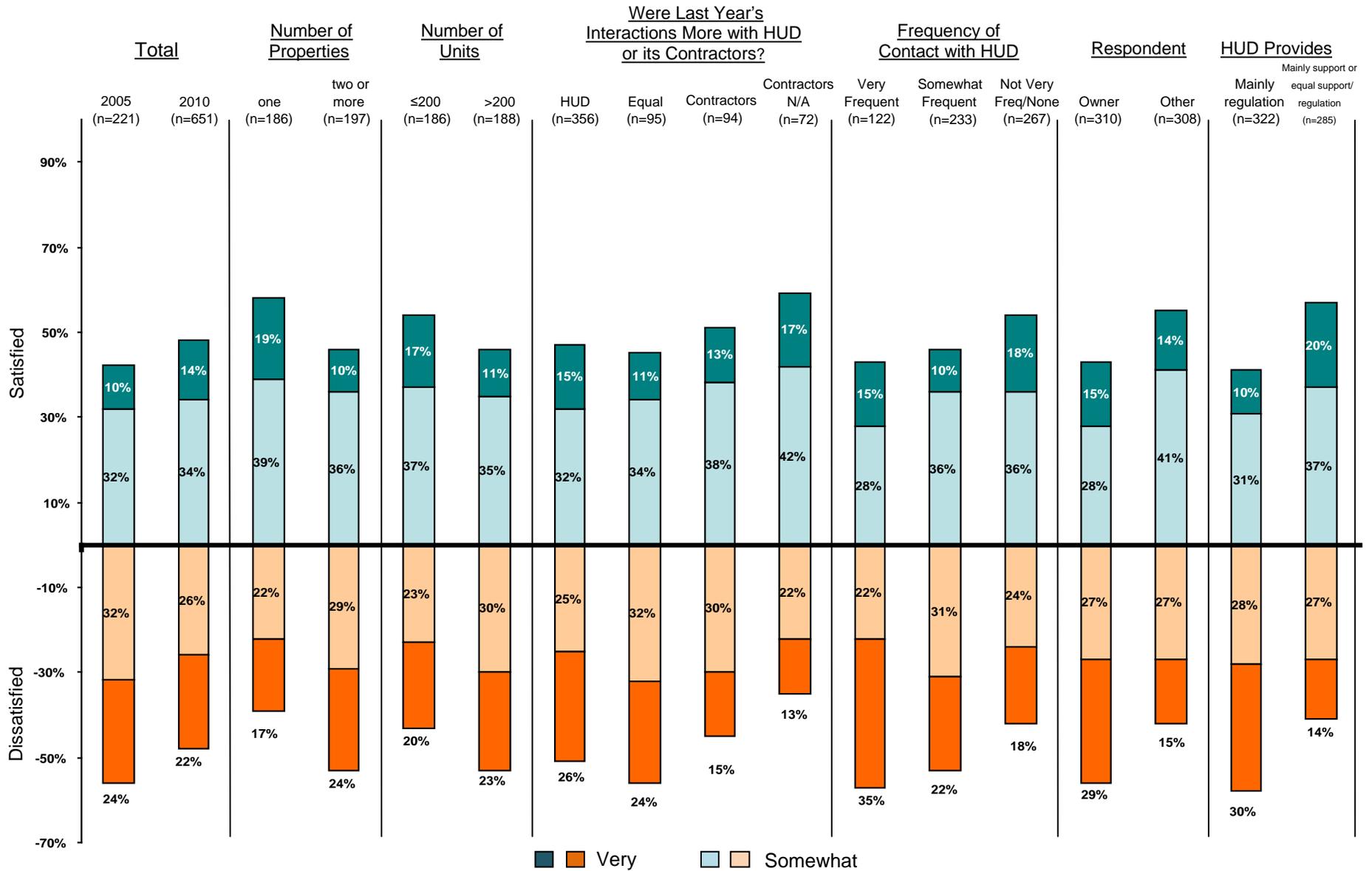
**Question 7d.** How satisfied or dissatisfied are you, in general, with the quality of guidance you currently get from HUD?  
 Were Last Year's



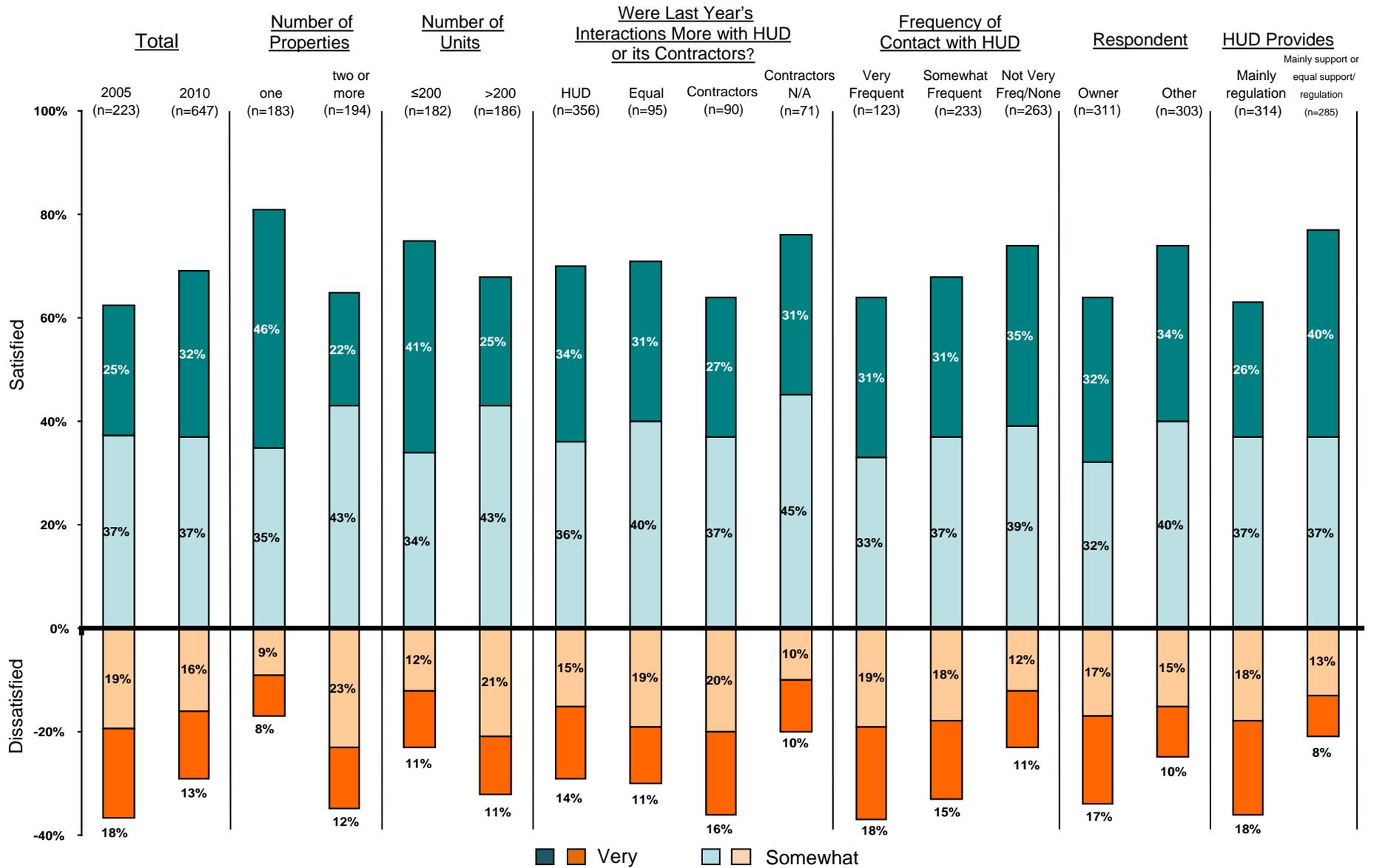
**Question 7e.** How satisfied or dissatisfied are you, in general, with the consistency of guidance you currently get from HUD?



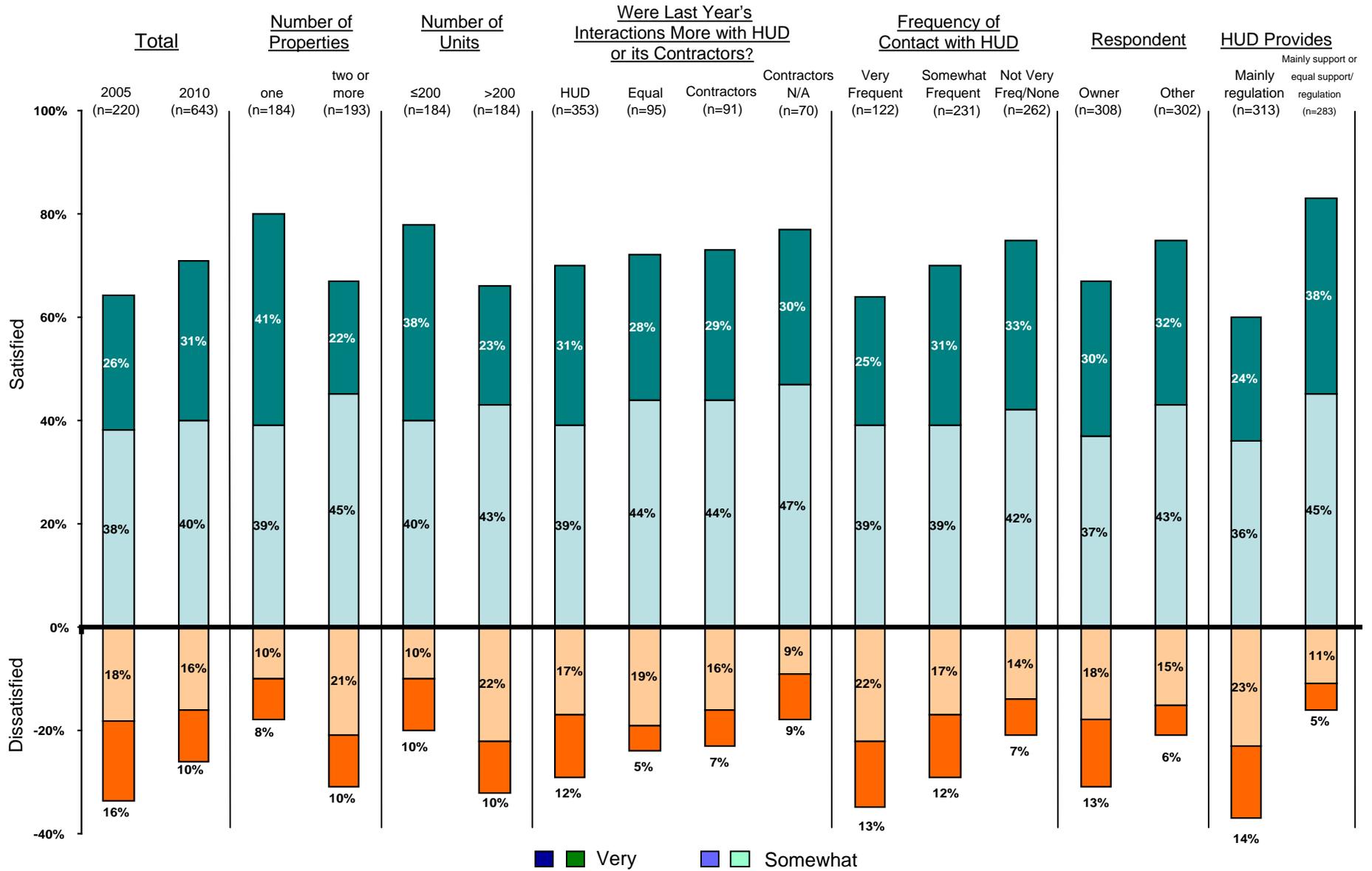
**Question 7f.** How satisfied or dissatisfied are you, in general, with the clarity of HUD rules and requirements that apply to your agency?



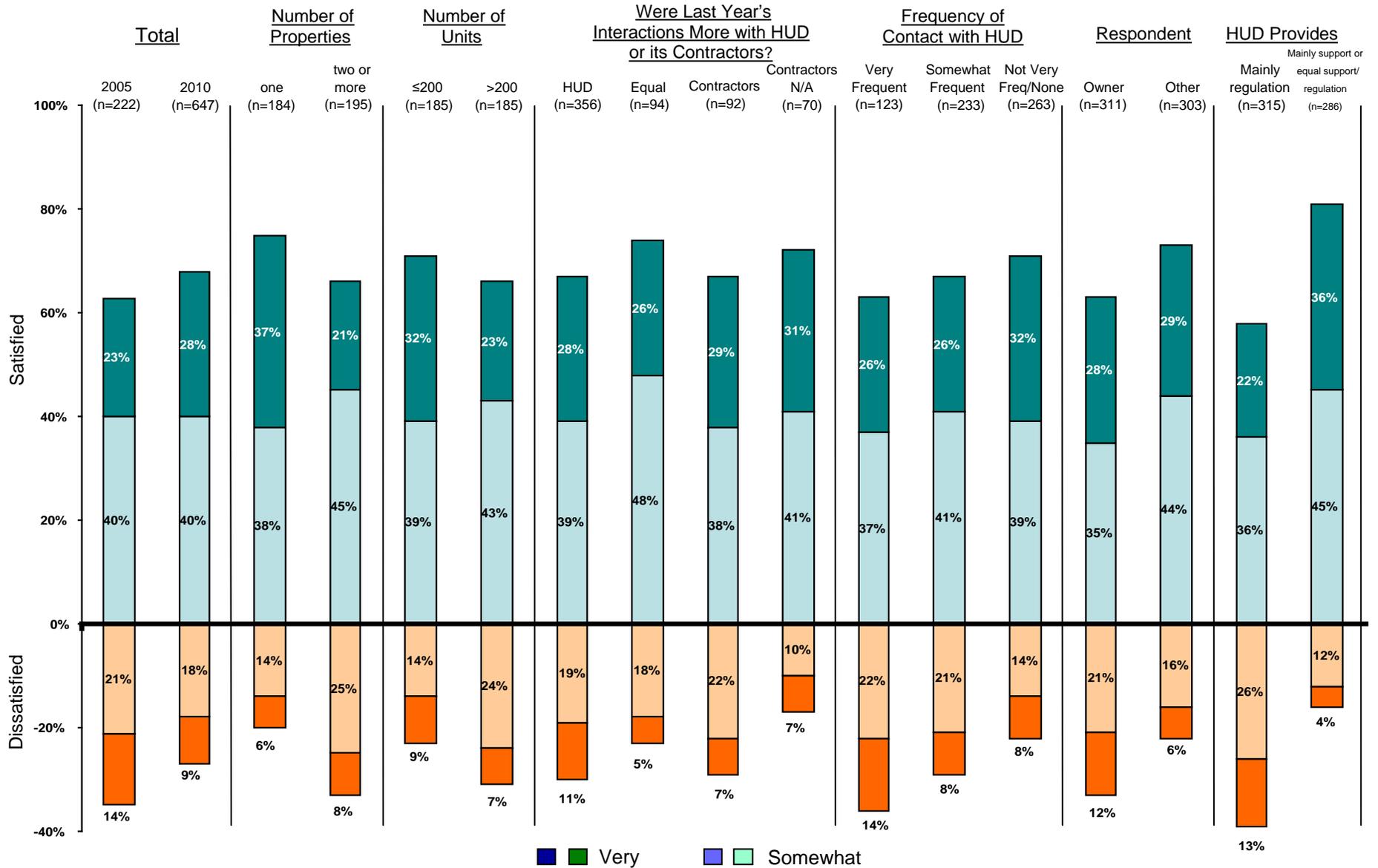
**Question 7g.** How satisfied or dissatisfied are you, in general, with the responsiveness of the people with whom you currently deal at HUD?



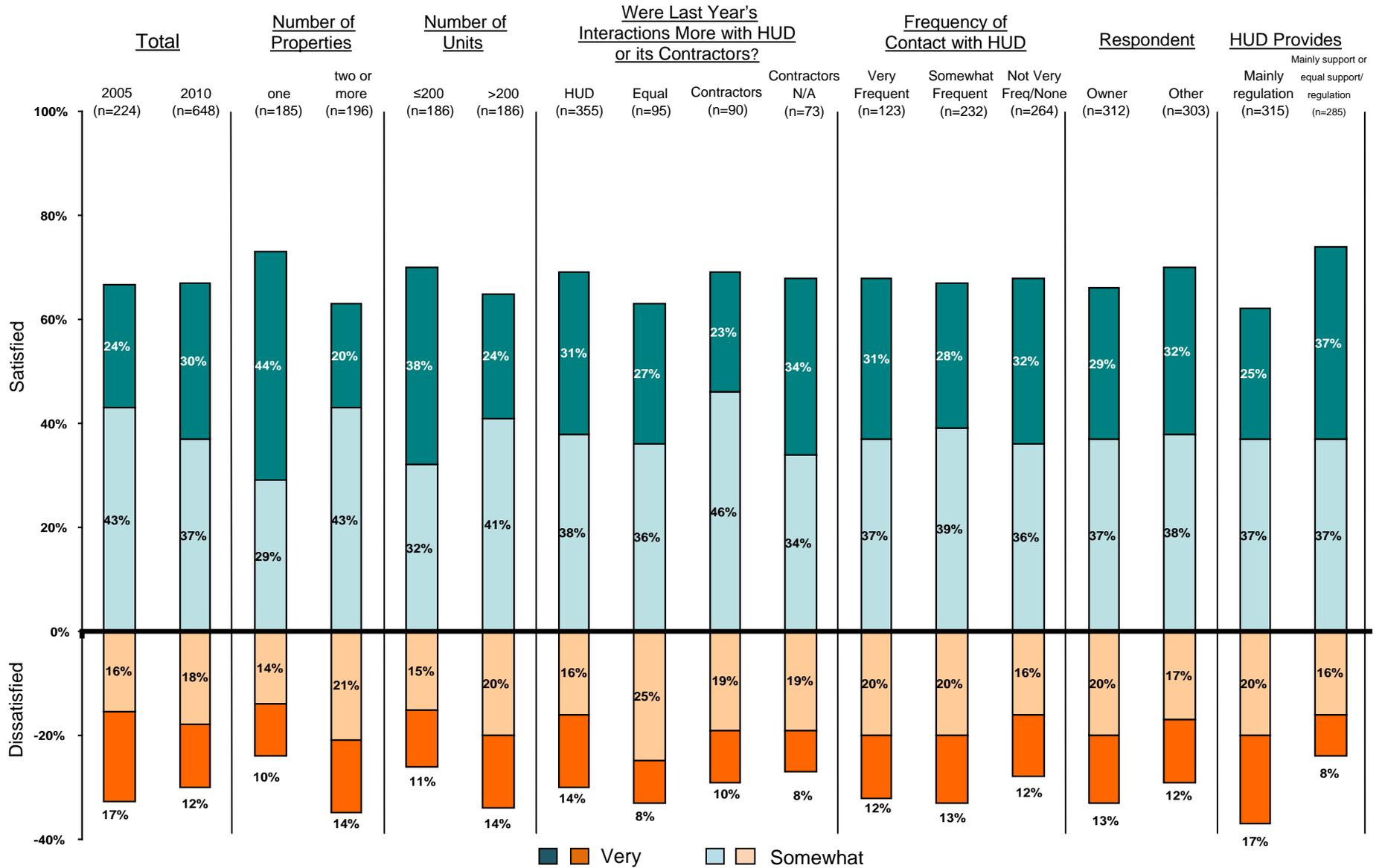
**Question 7h.** How satisfied or dissatisfied are you, in general, with the competence of the people with whom you currently deal at HUD?



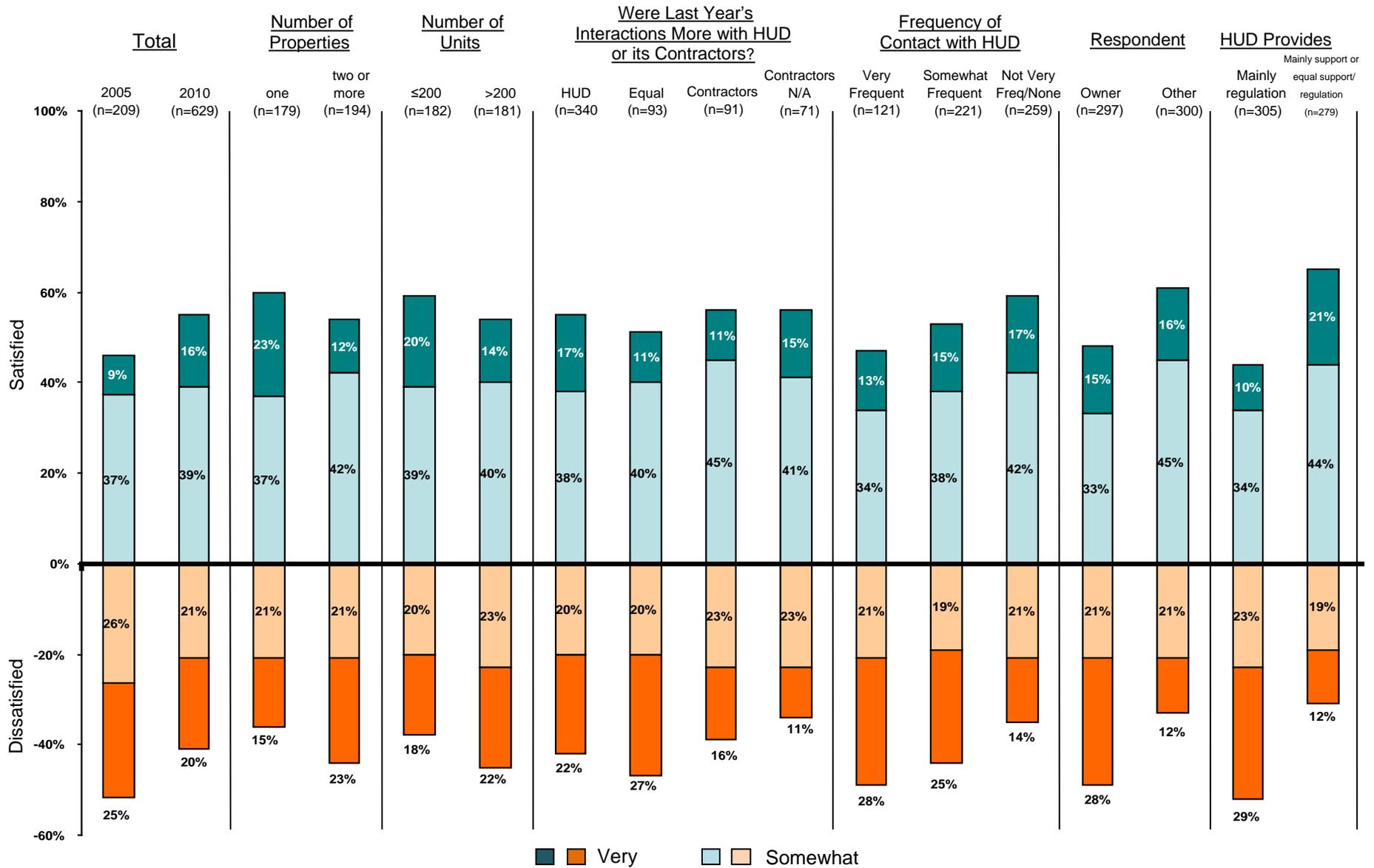
**Question 7i.** How satisfied or dissatisfied are you, in general, with the extent to which HUD employees have the knowledge, skills, and ability to do their work?



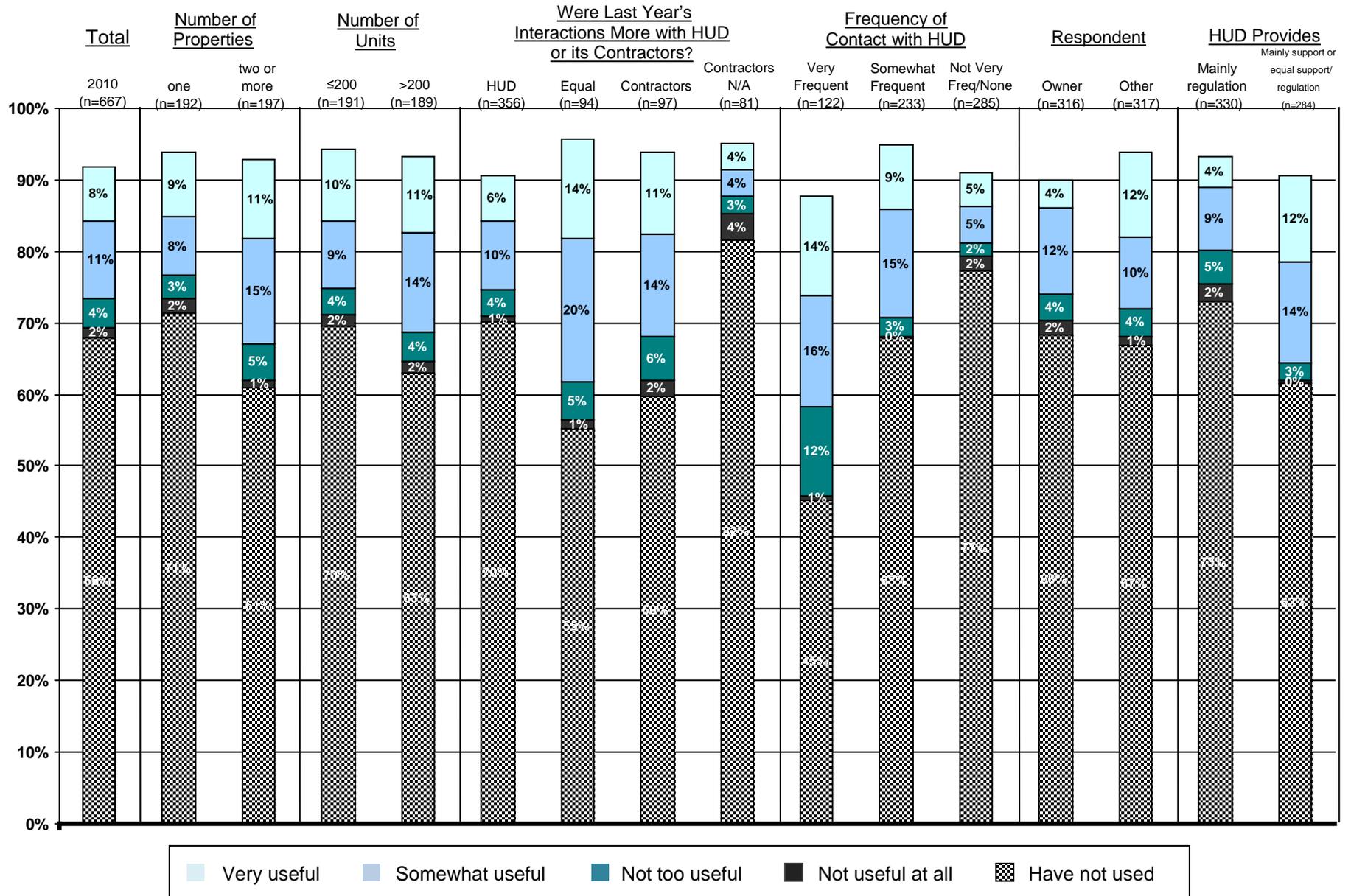
**Question 7j.** How satisfied or dissatisfied are you, in general, with your ability to reach the people at HUD whom you need to contact?



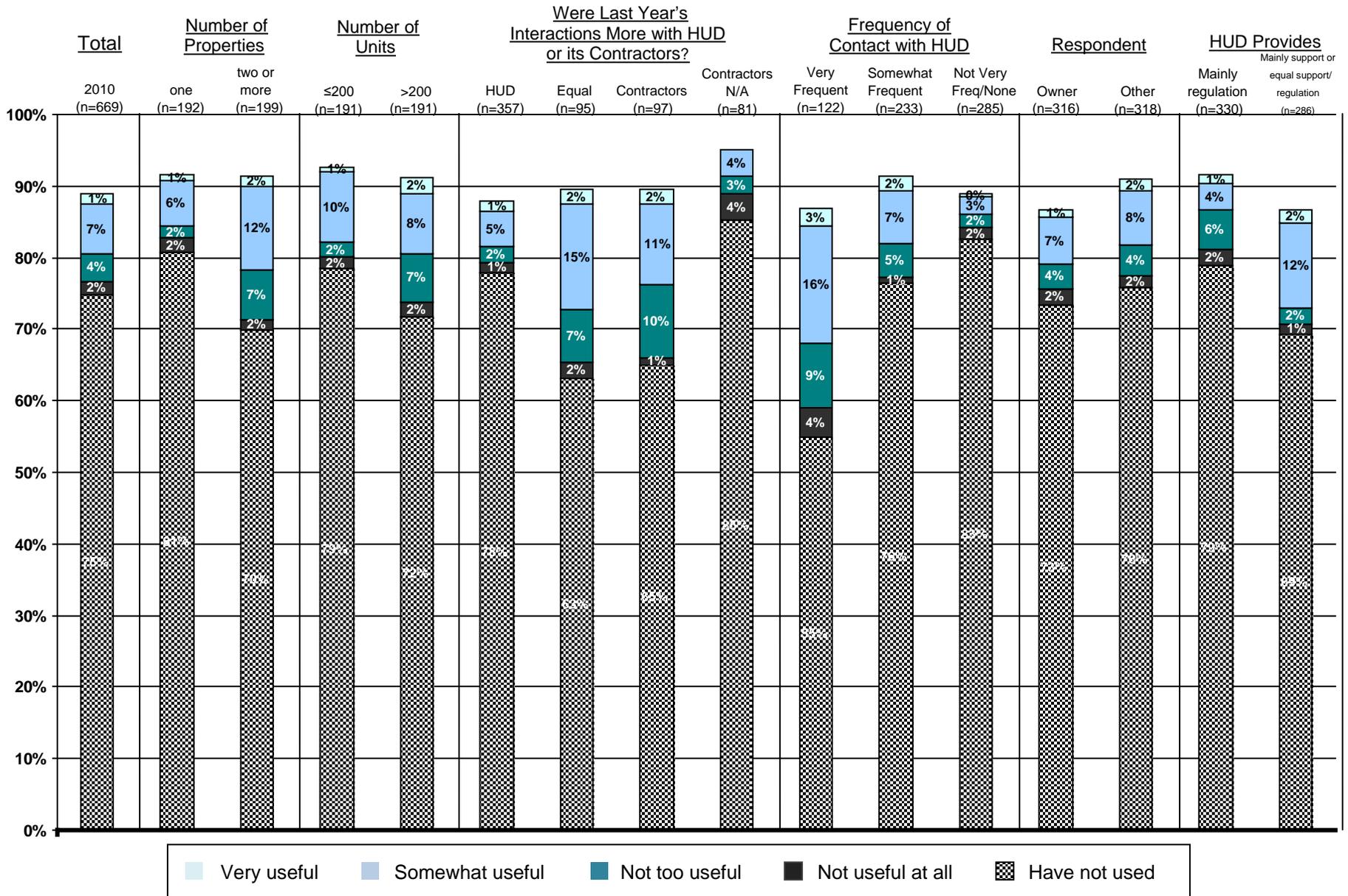
**Question 7k.** How satisfied or dissatisfied are you, in general, with the time commitment needed to comply with HUD reporting requirements?



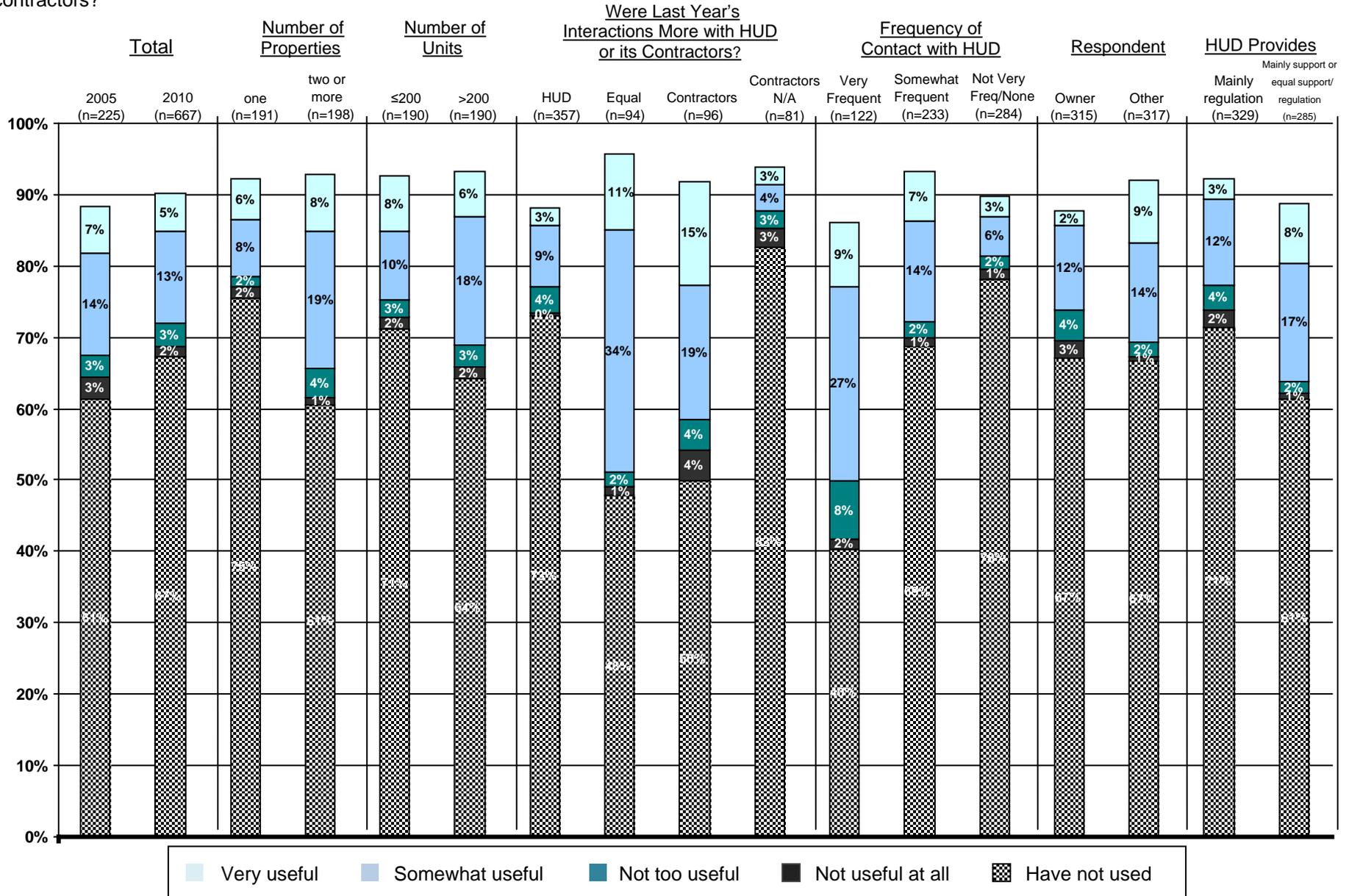
**Question 8a.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored conferences?



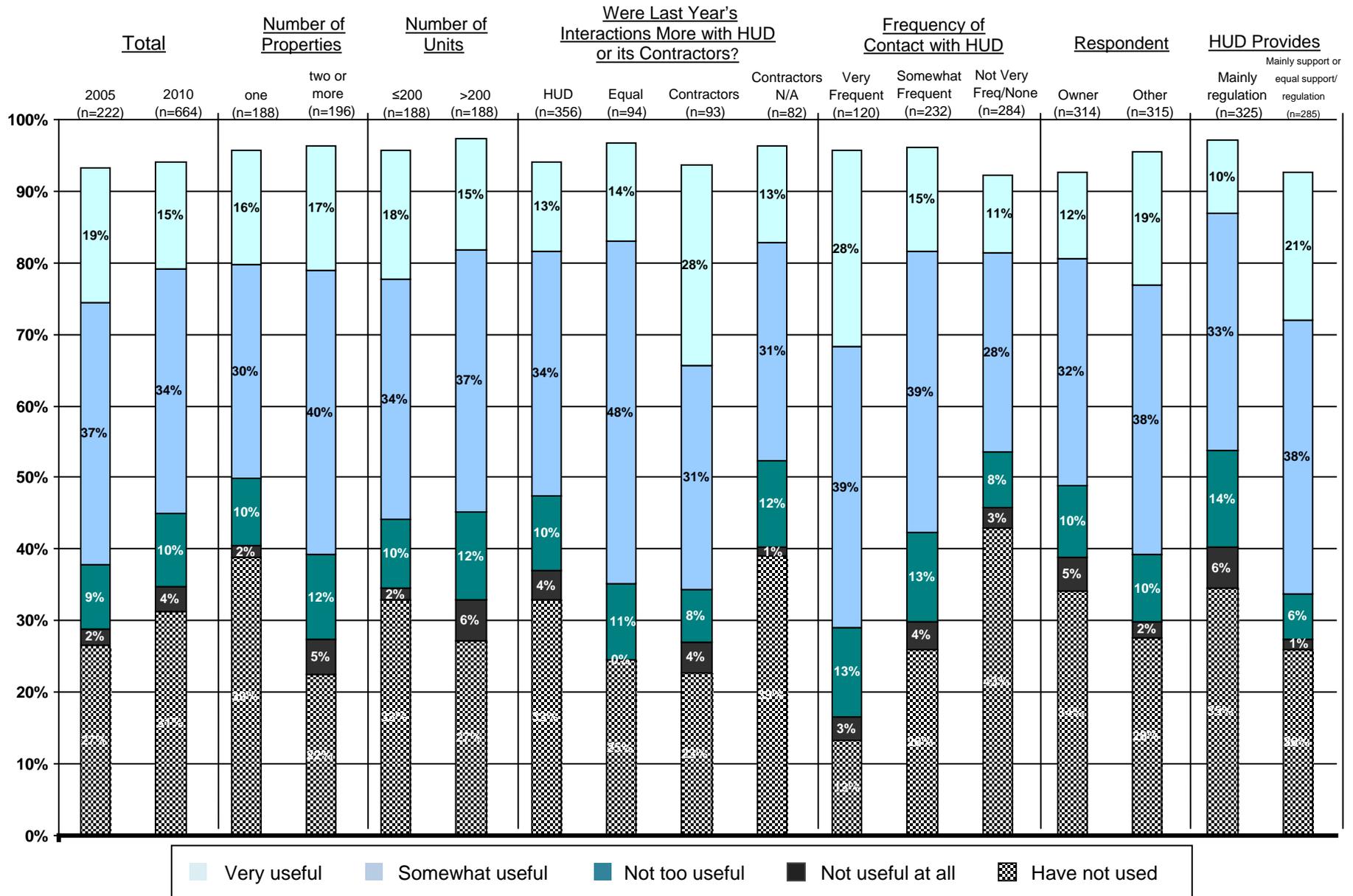
**Question 8b.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored satellite broadcasts?



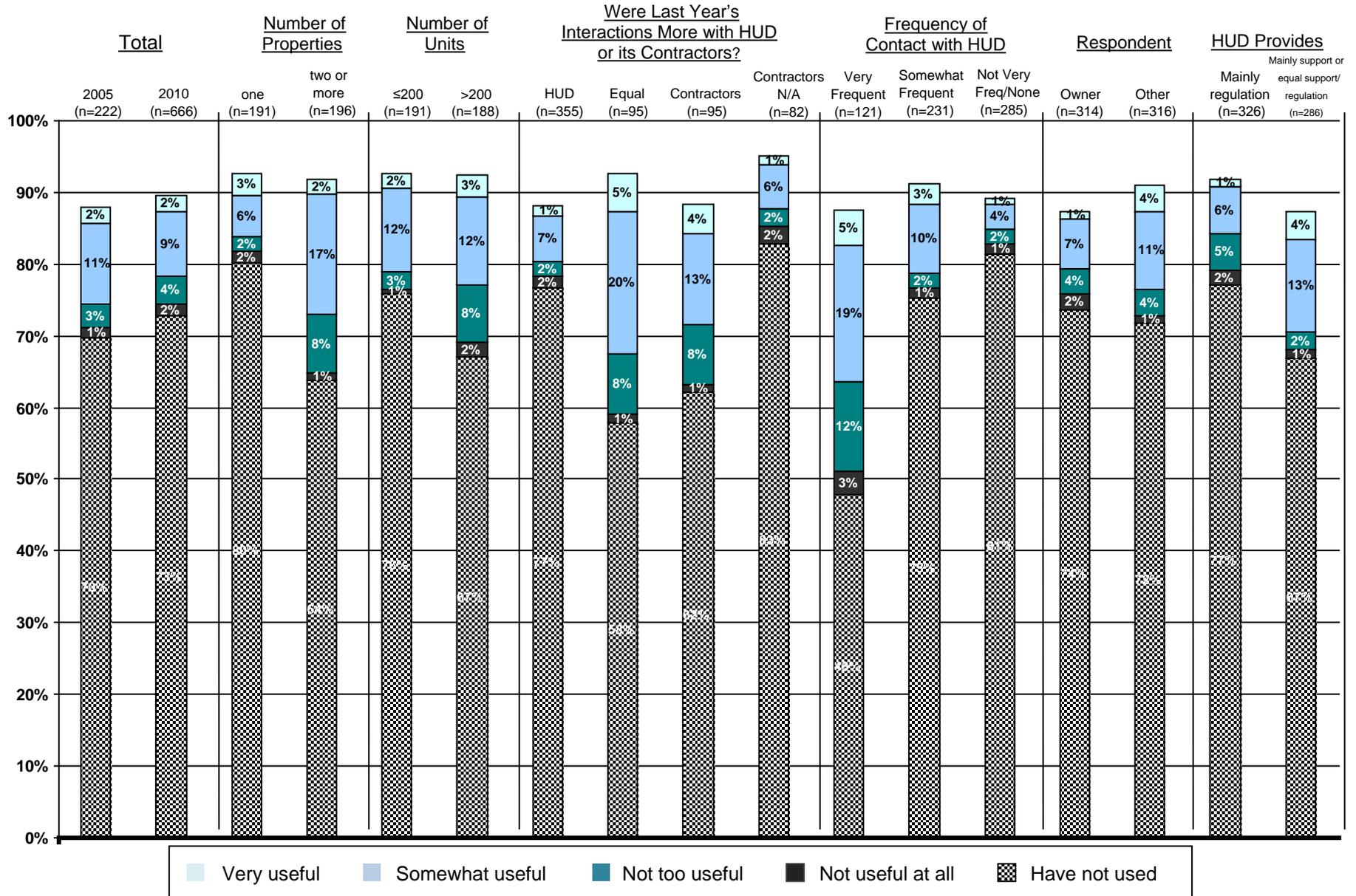
**Question 8c.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored training programs conducted by contractors?



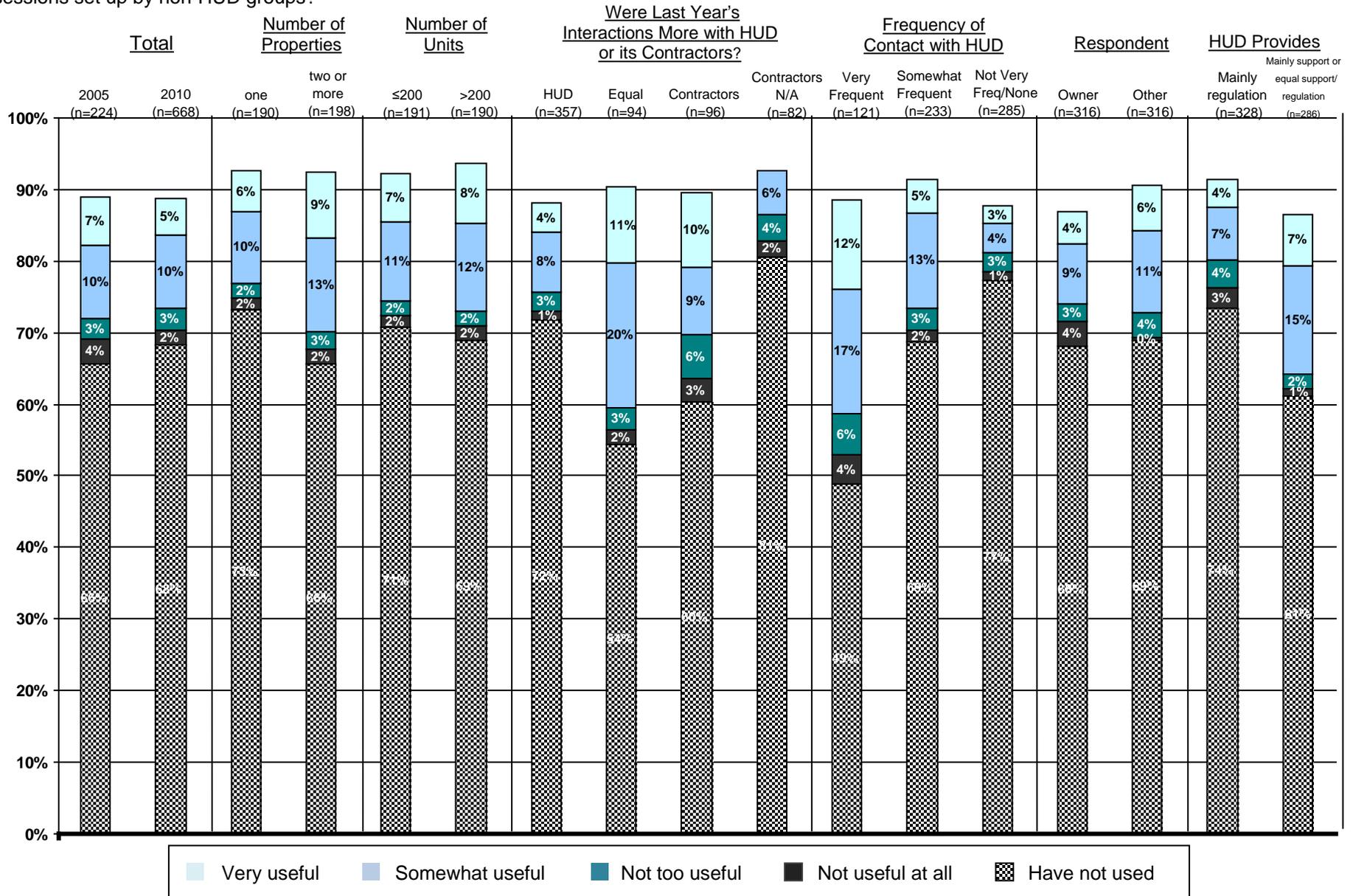
**Question 8d.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webpage?



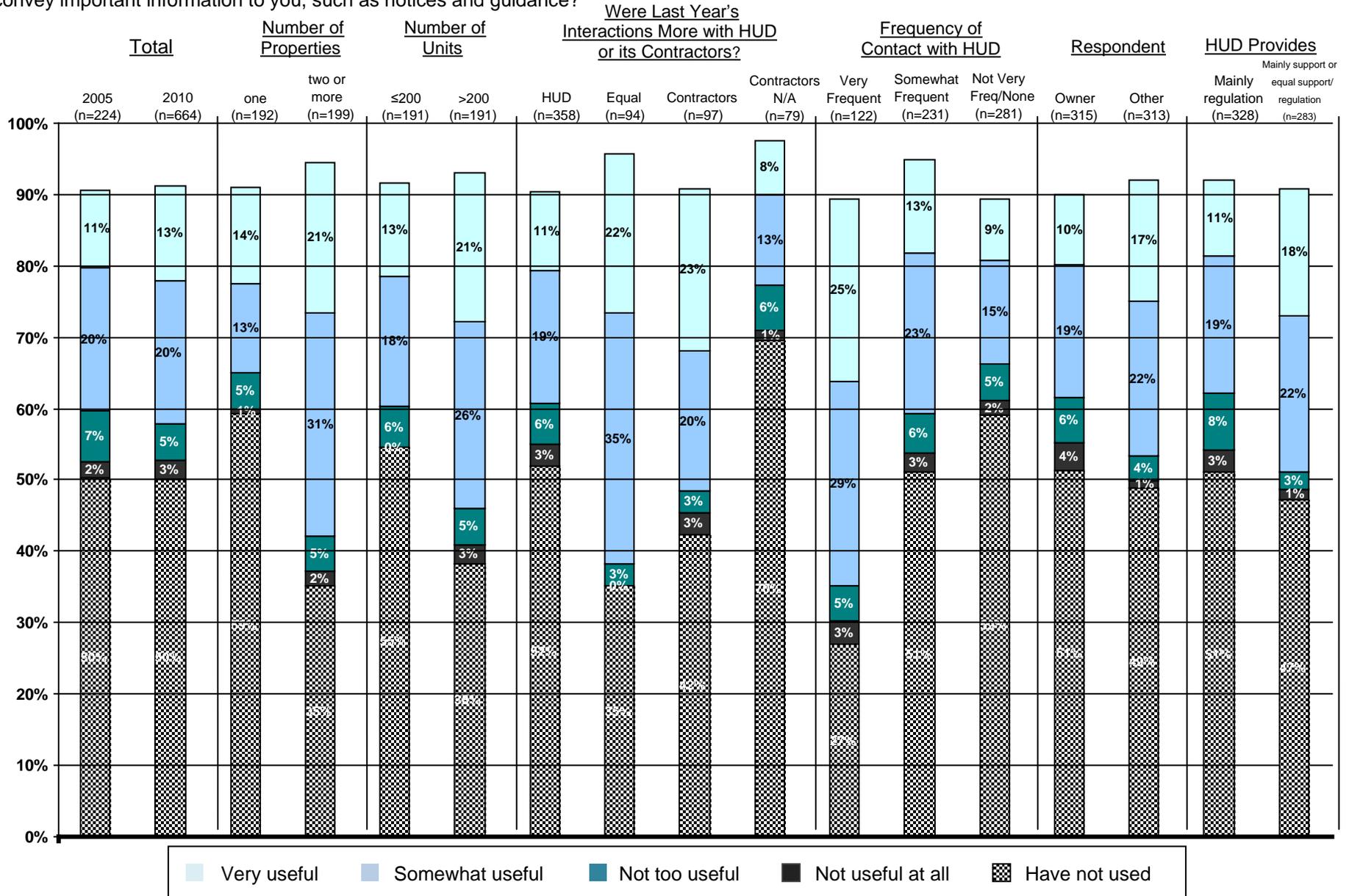
**Question 8e.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webcast training?



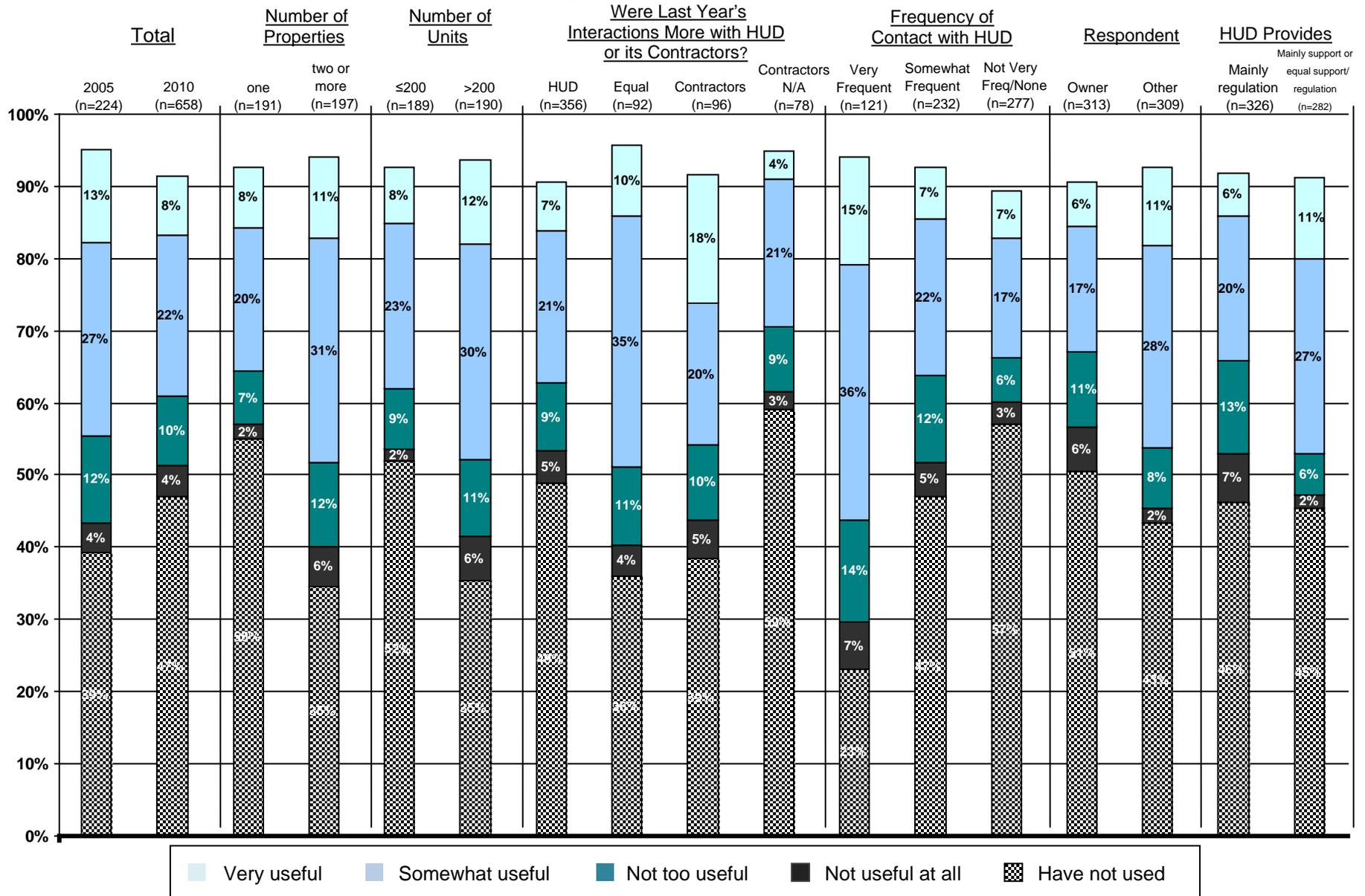
**Question 8f.** How useful or not useful have you found HUD's training and technical assistance through HUD participation in panel discussions and training sessions set up by non-HUD groups?



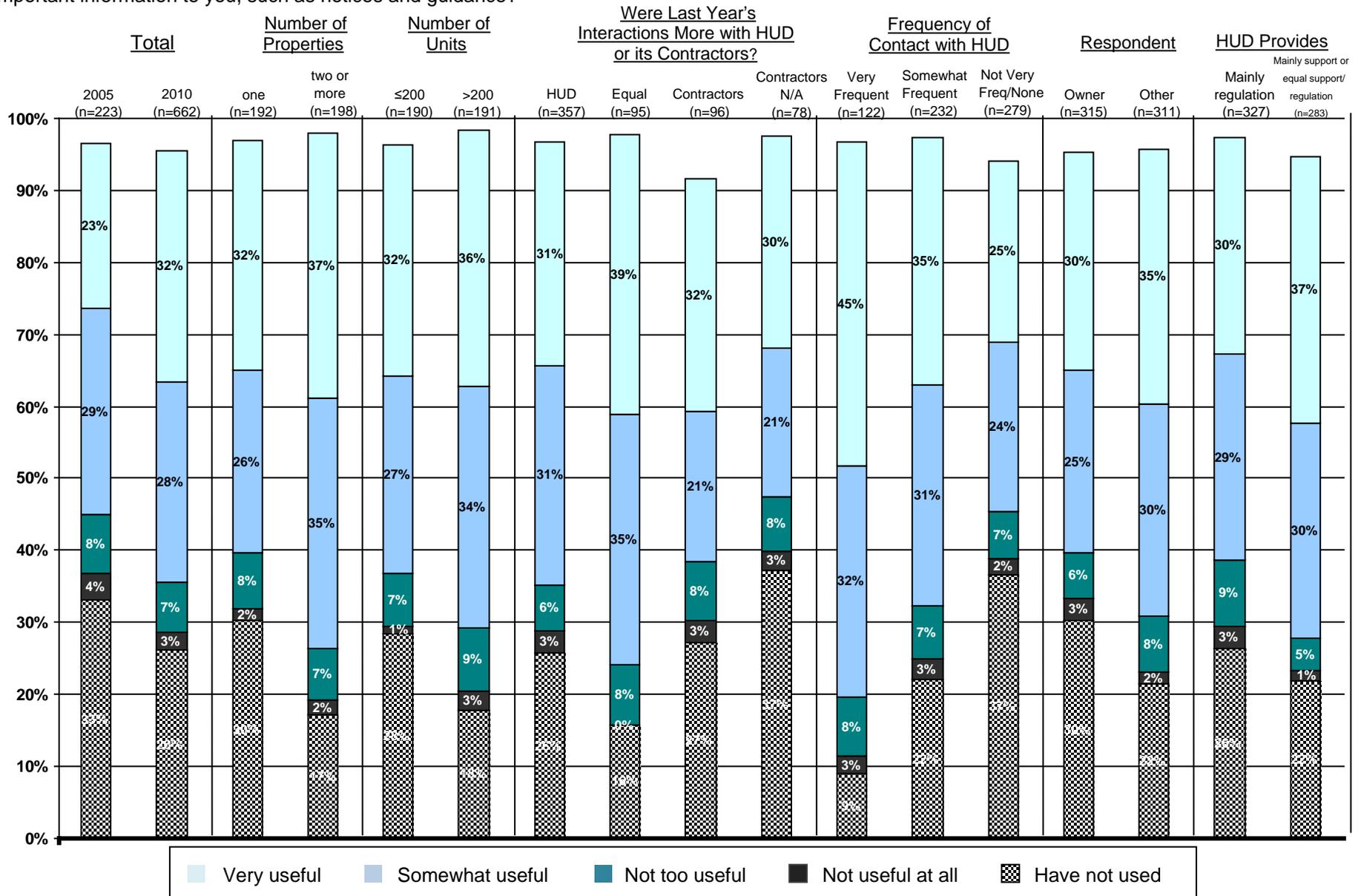
**Question 9a.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD listservs have been as a tool for HUD to convey important information to you, such as notices and guidance?



**Question 9b.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD website postings have been as a tool for HUD to convey important information to you, such as notices and guidance?

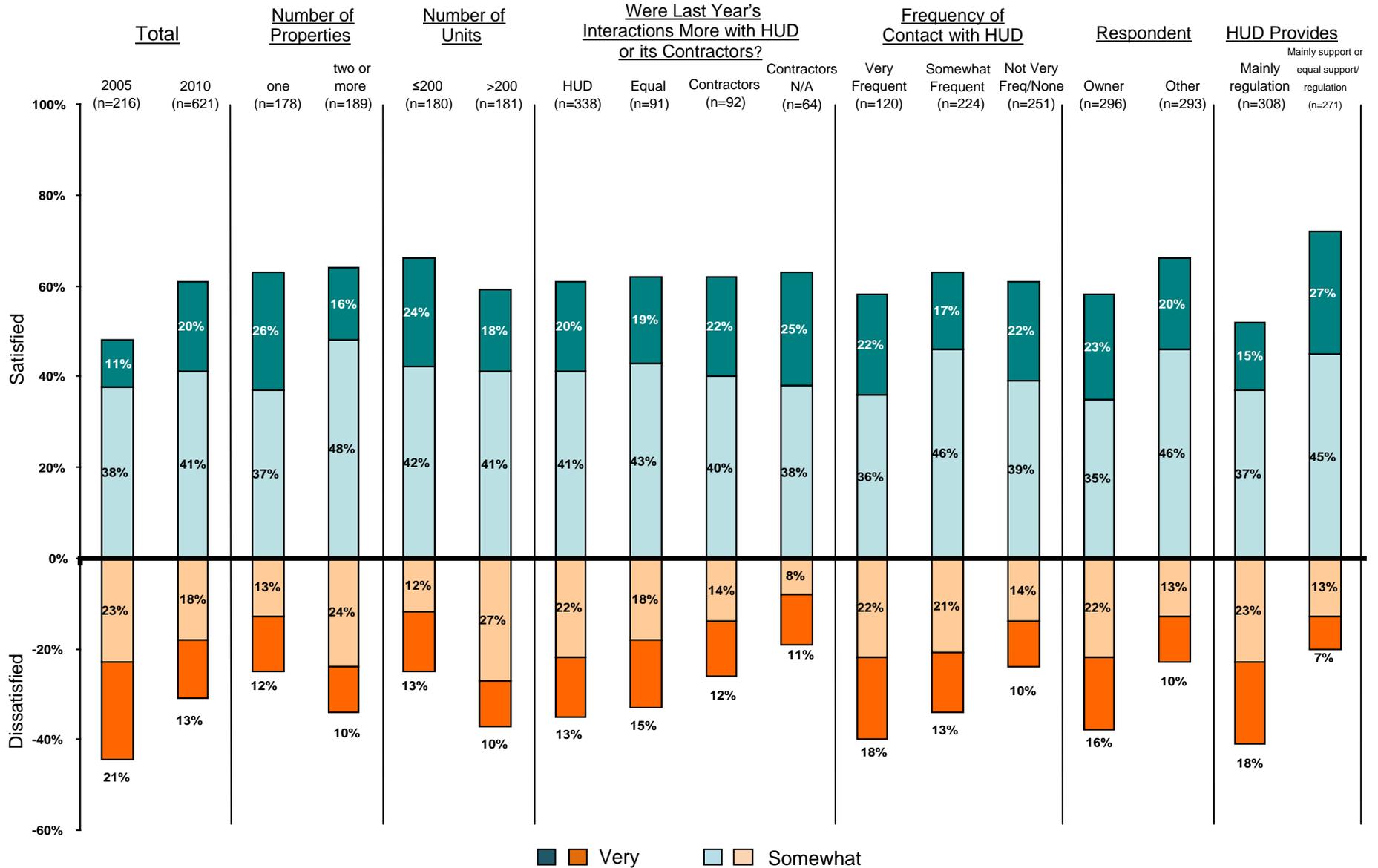


**Question 9c.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD e-mail has been as a tool for HUD to convey important information to you, such as notices and guidance?

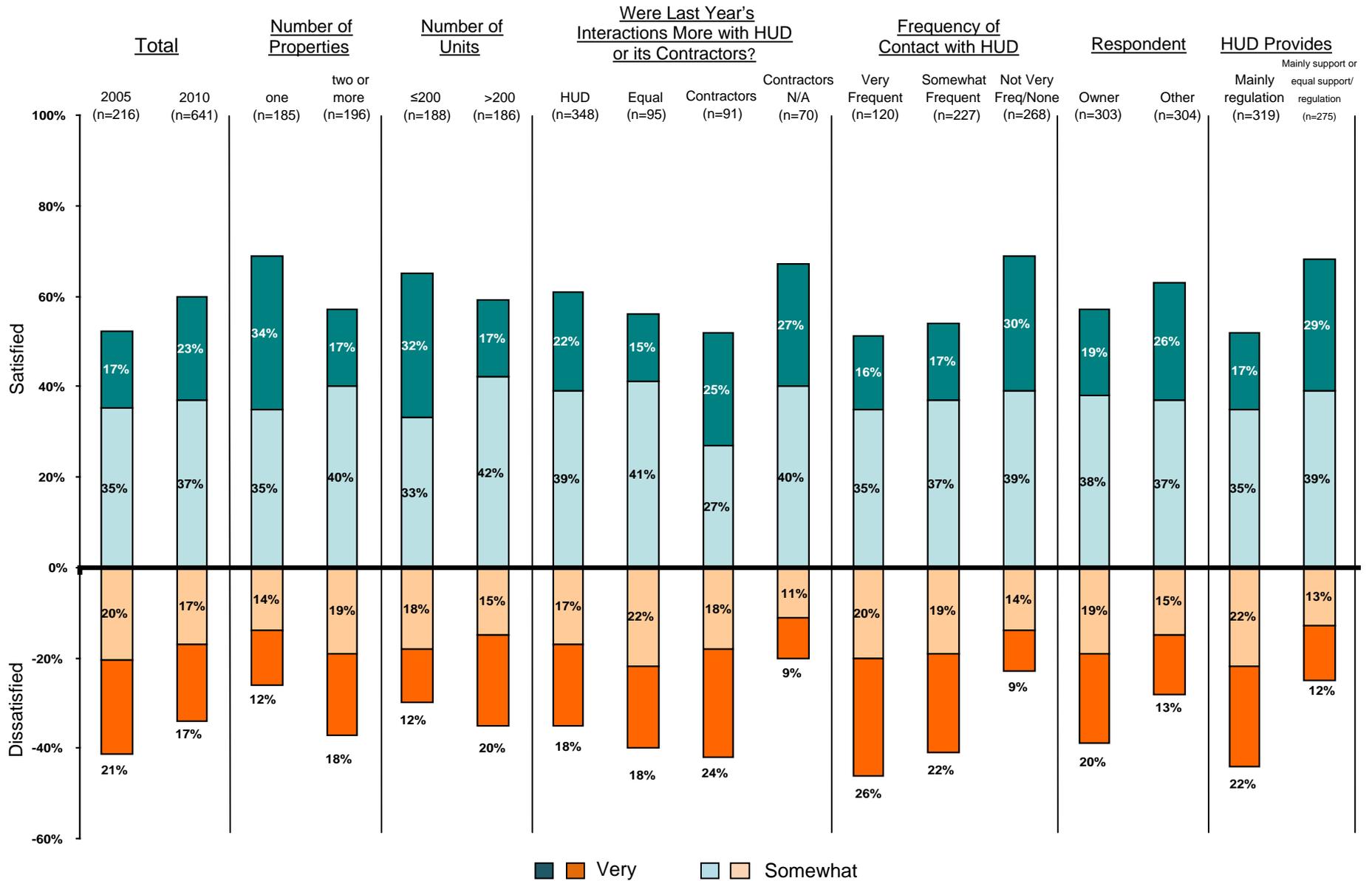




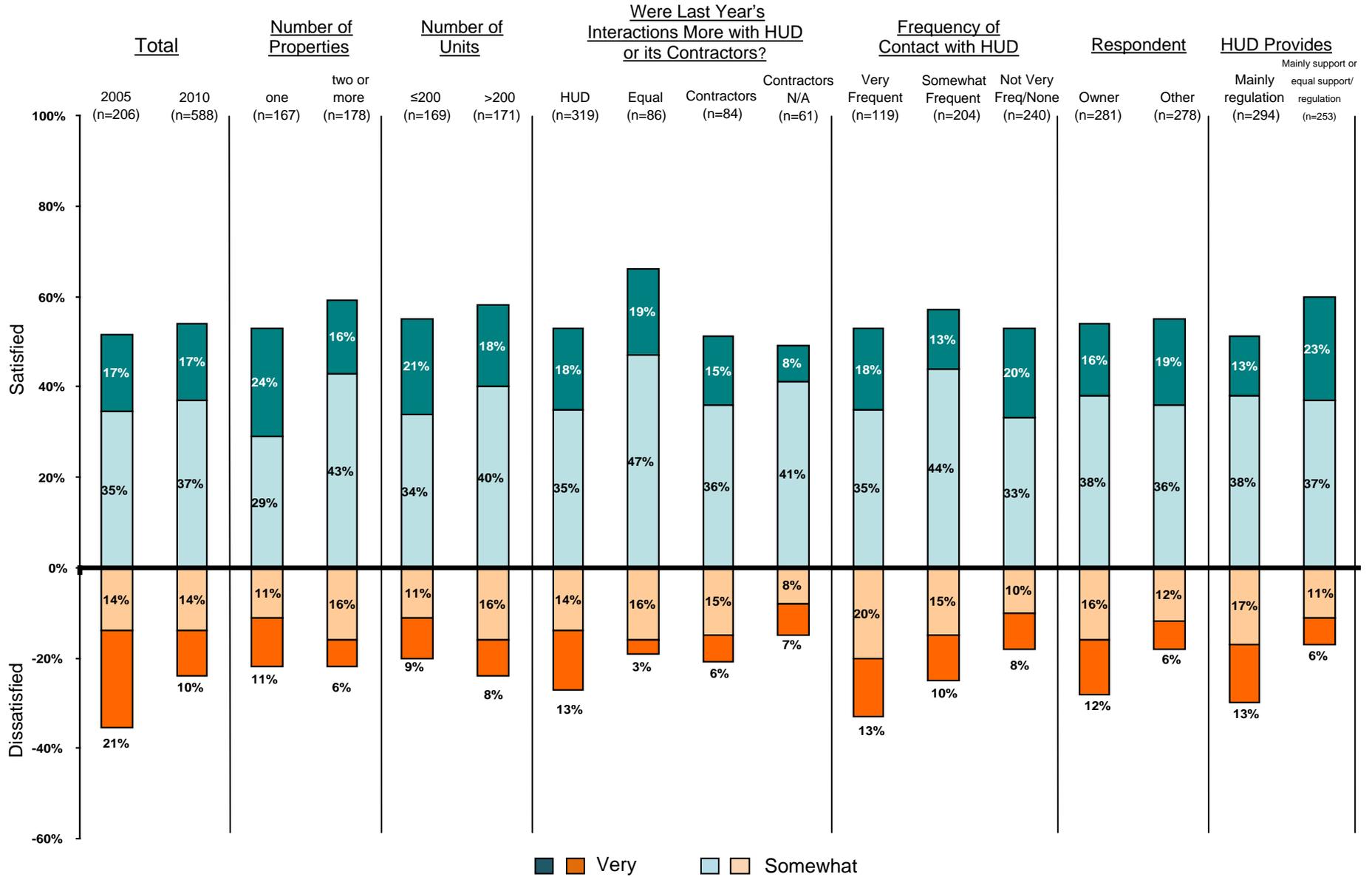
**Question 11a.** How satisfied or dissatisfied are you with the ability of HUD field office personnel—those in the multifamily hubs and program centers, and contractors working on behalf of HUD (such as PBCAs)—to consistently interpret policies and regulations that pertain to your properties?



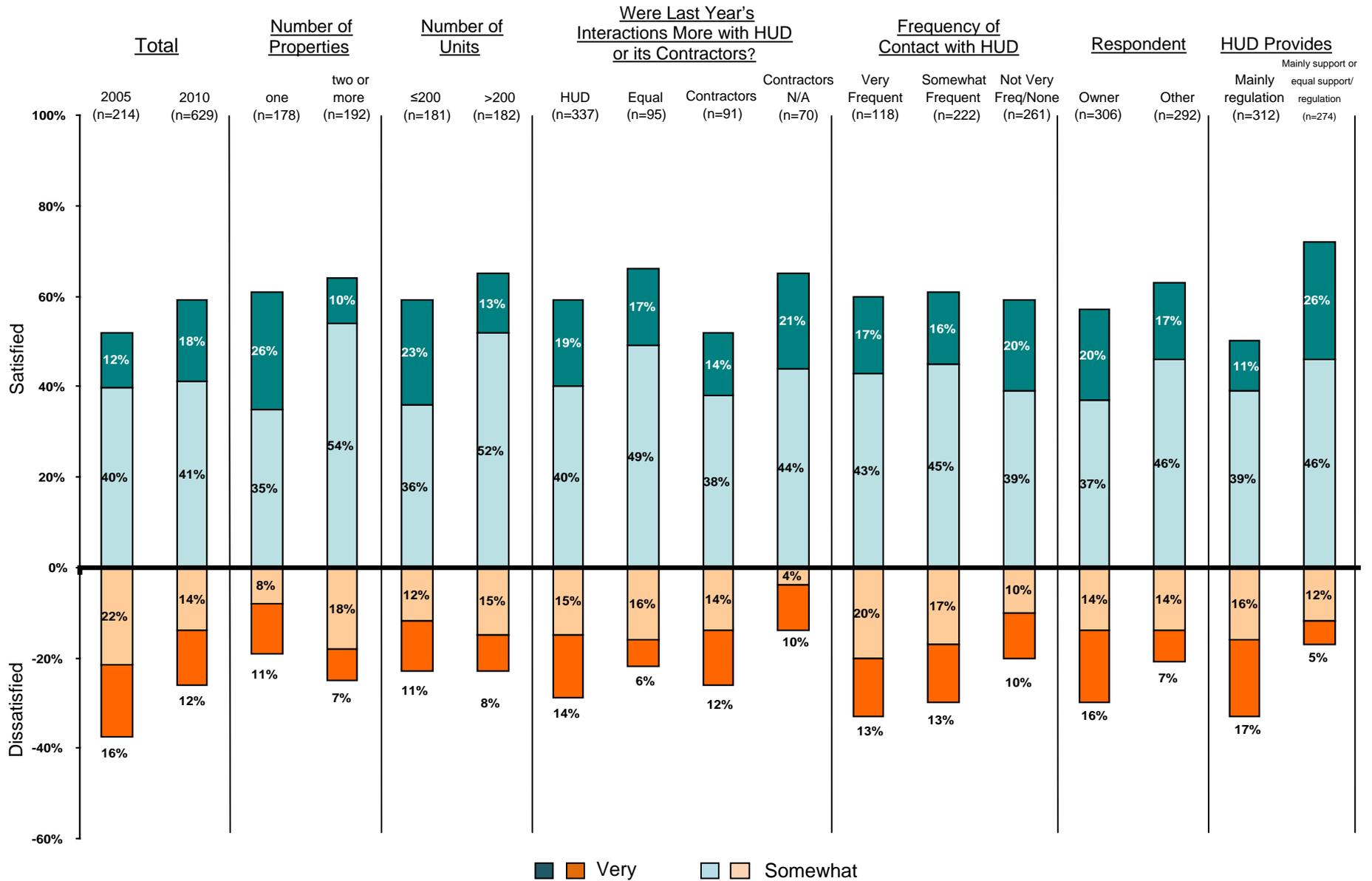
**Question 11b.** How satisfied or dissatisfied are you with the physical inspections by HUD's Real Estate Assessment Center (REAC)?



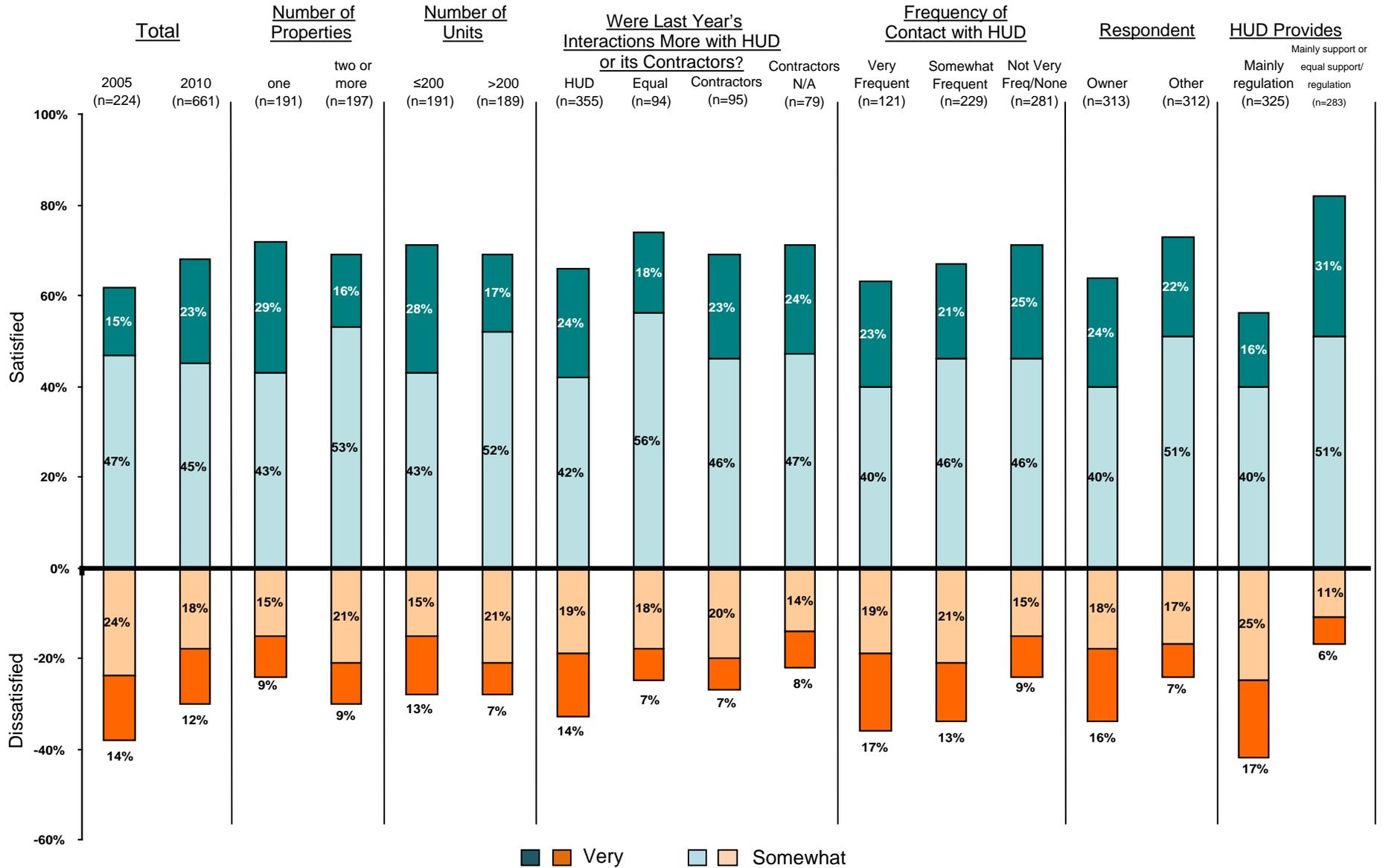
**Question 11c.** How satisfied or dissatisfied are you with electronic financial reporting to REAC?



**Question 11d.** How satisfied or dissatisfied are you with HUD's capacity to monitor and provide oversight related to your property or properties?

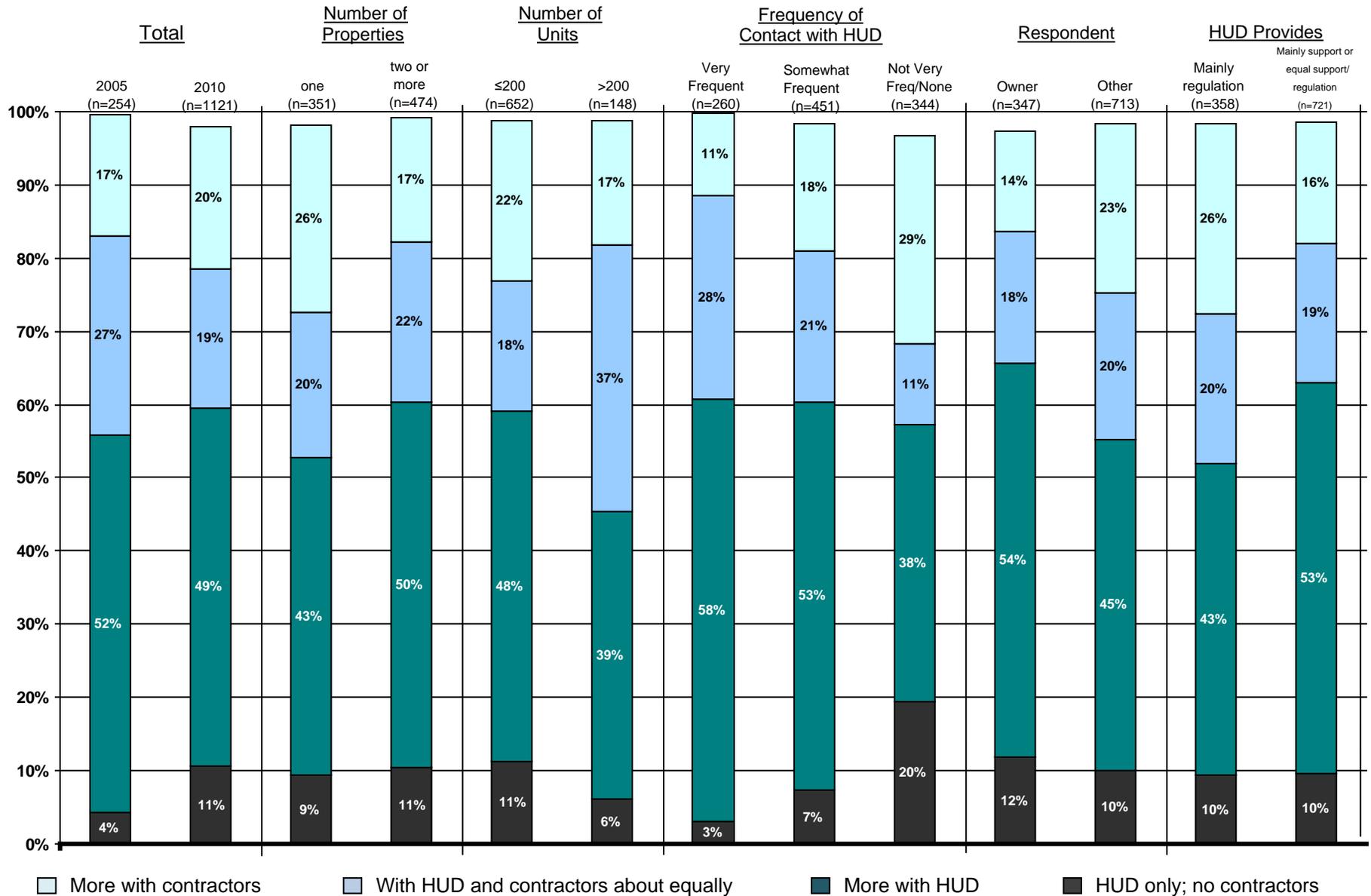


**Question 12.** At present, taking everything into consideration, how satisfied or dissatisfied are you with HUD's overall performance?

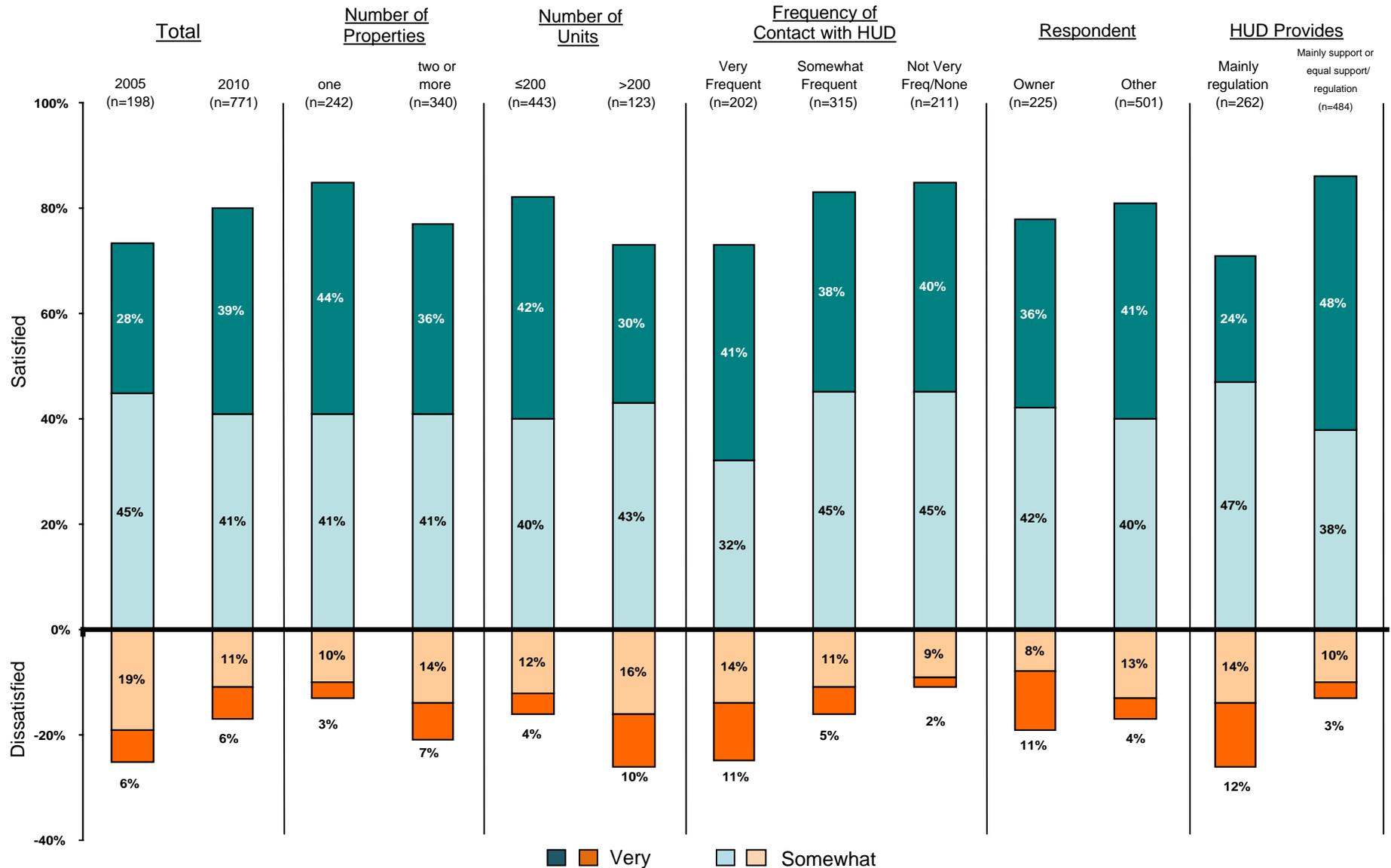


**C. SECTION 202/811 OWNERS**

**Question 3.** During the past twelve months, when you interacted with HUD, were your dealings more with HUD, or were they more with HUD's contractors/third-party contractors?

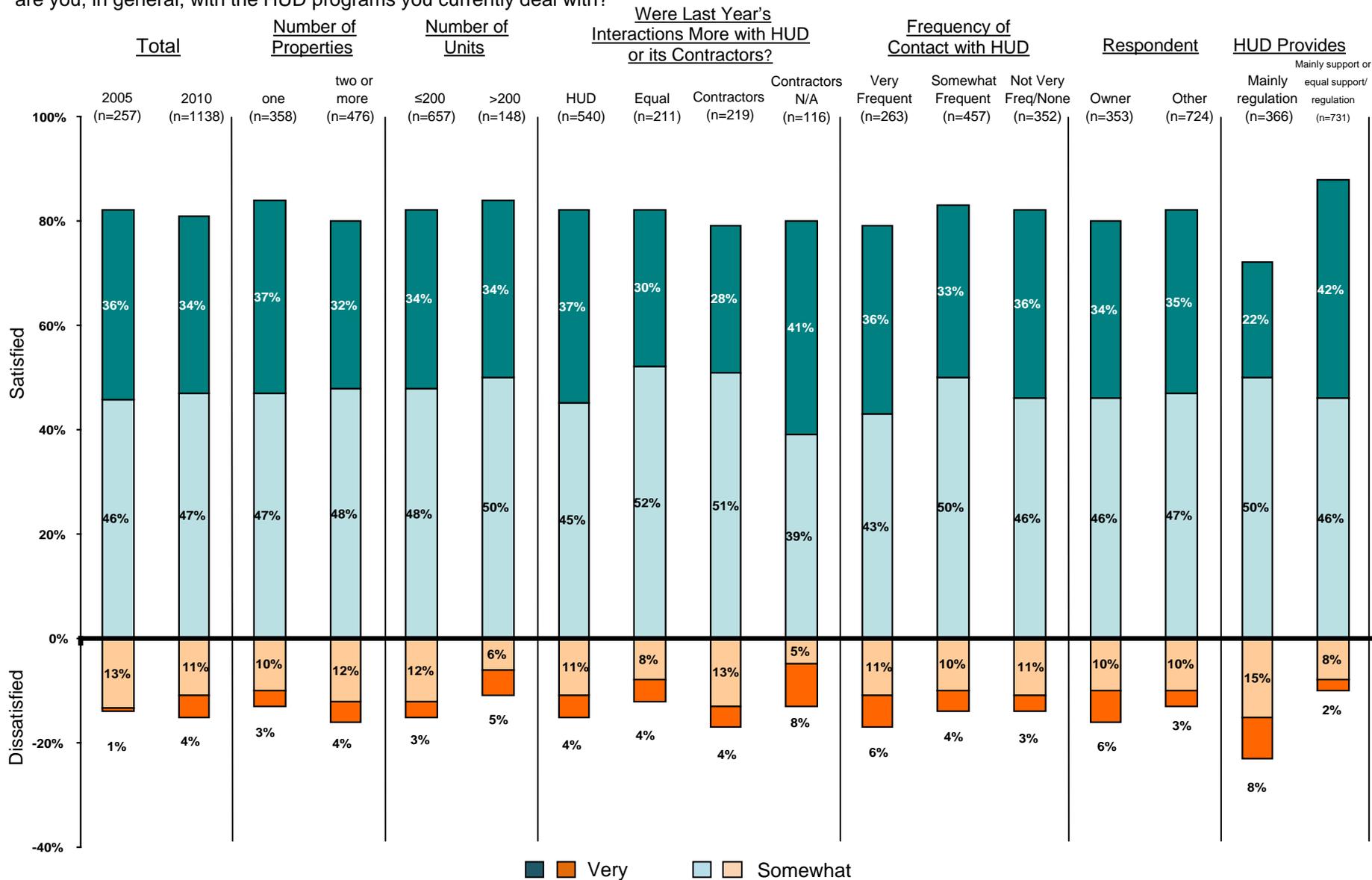


**Question 4.** Overall, taking everything into consideration, how satisfied or dissatisfied are you with the service provided by HUD's contractors/third-party contractors?

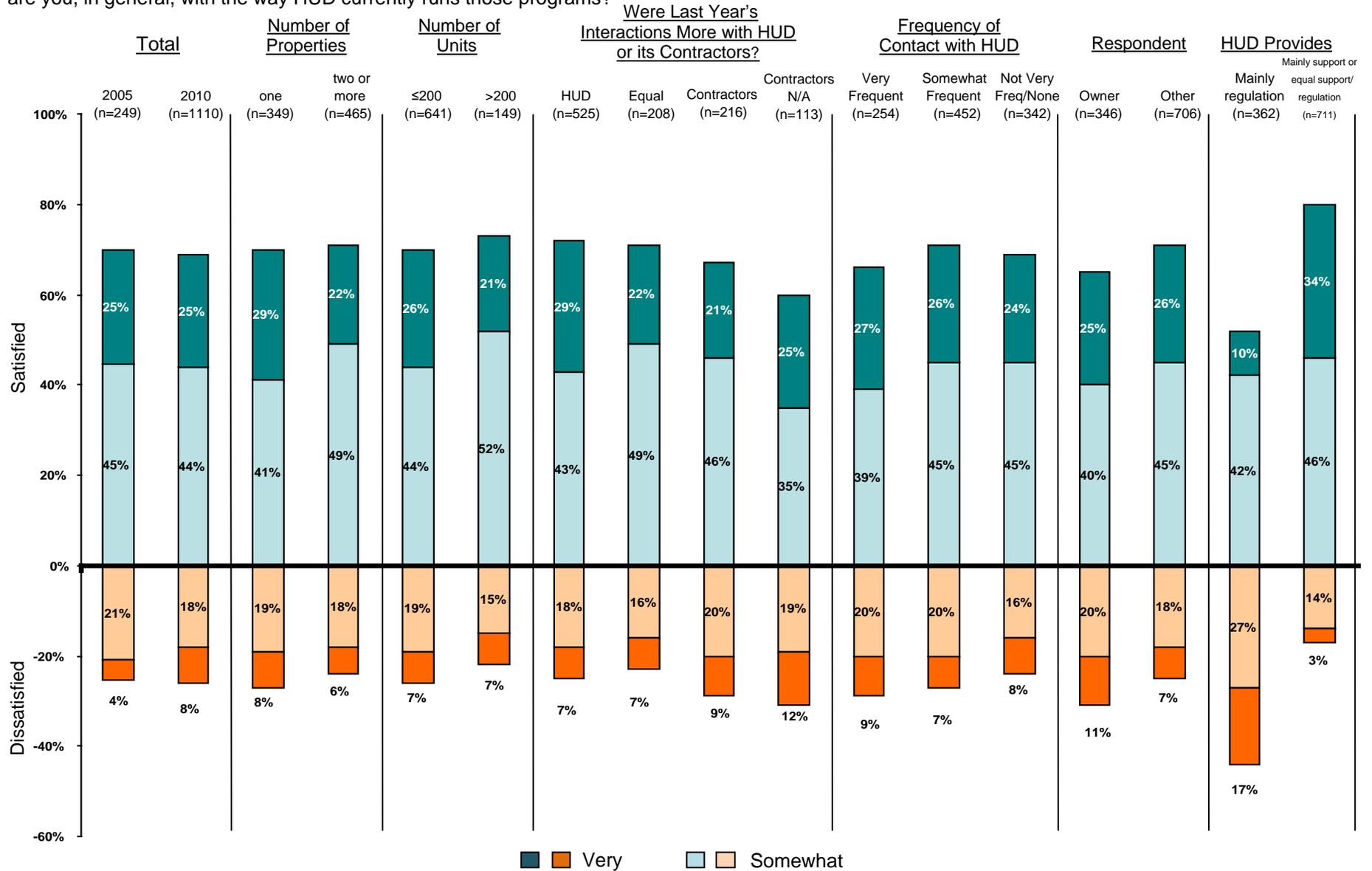


This chart excludes the 119 organizations that said they do not deal with HUD's contractors.

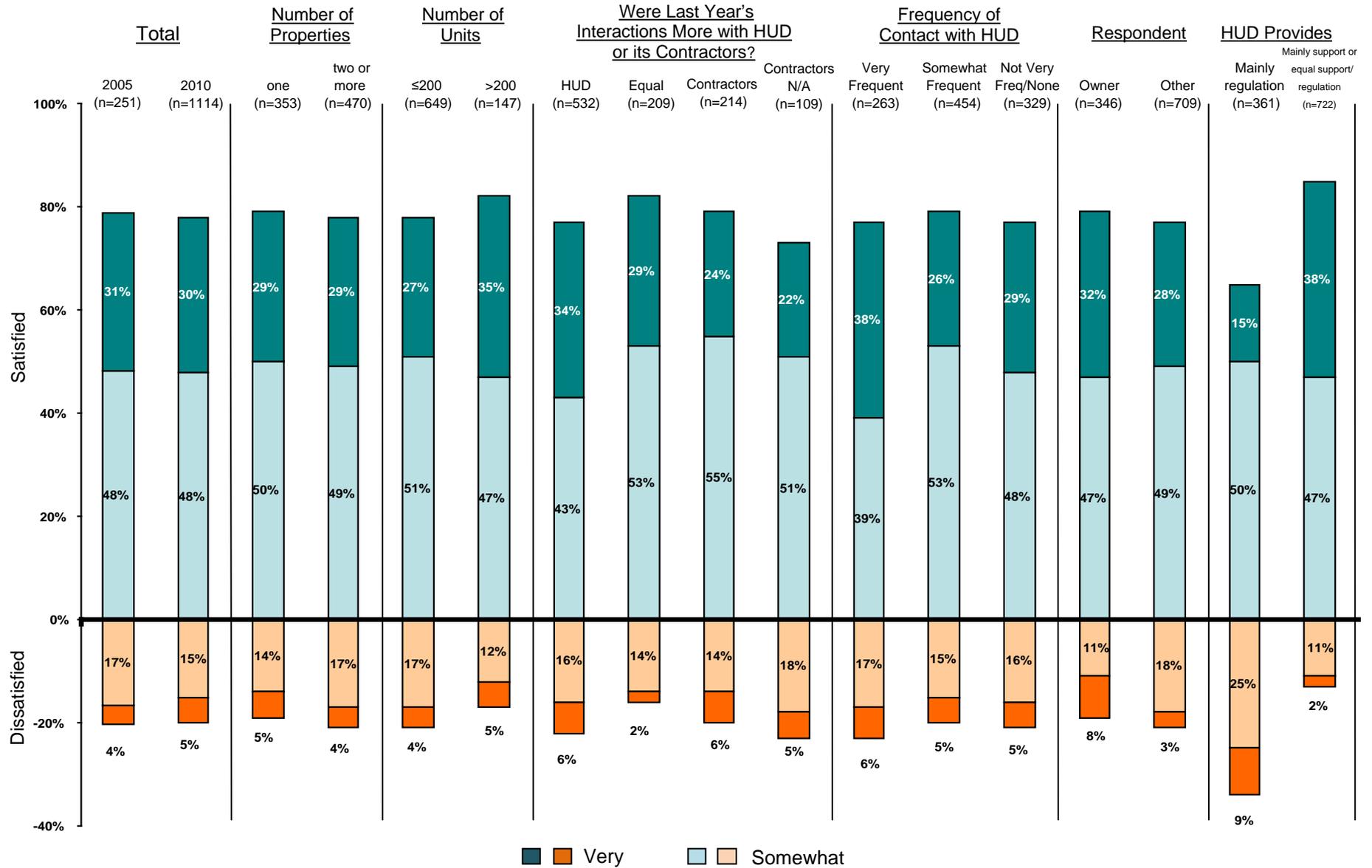
**Question 6a.** Thinking first about HUD programs with which you currently deal and then about how HUD runs those programs, how satisfied or dissatisfied are you, in general, with the HUD programs you currently deal with?



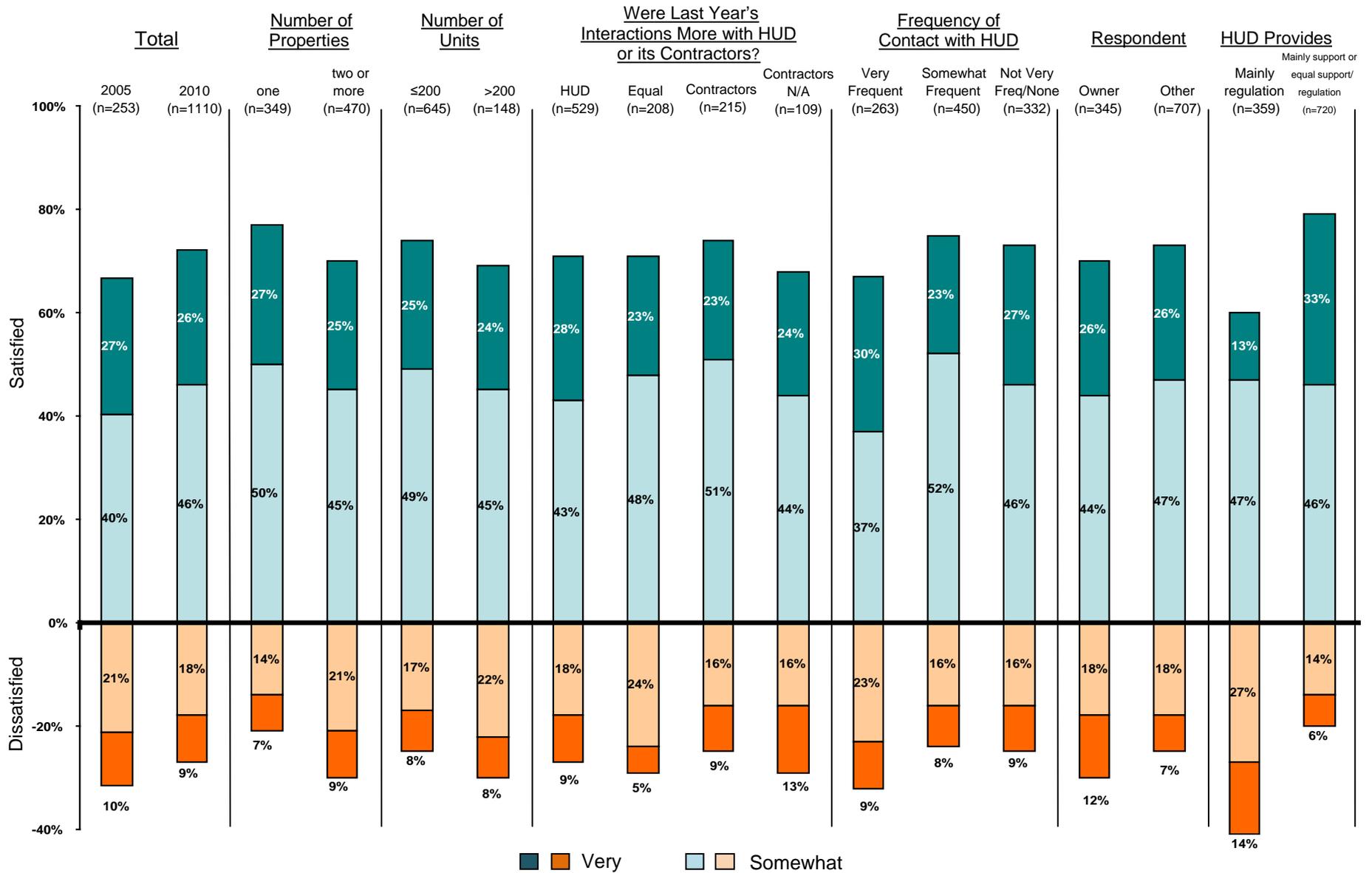
**Question 6b.** Thinking first about HUD programs with which you currently deal and then about how HUD runs those programs, how satisfied or dissatisfied are you, in general, with the way HUD currently runs those programs?



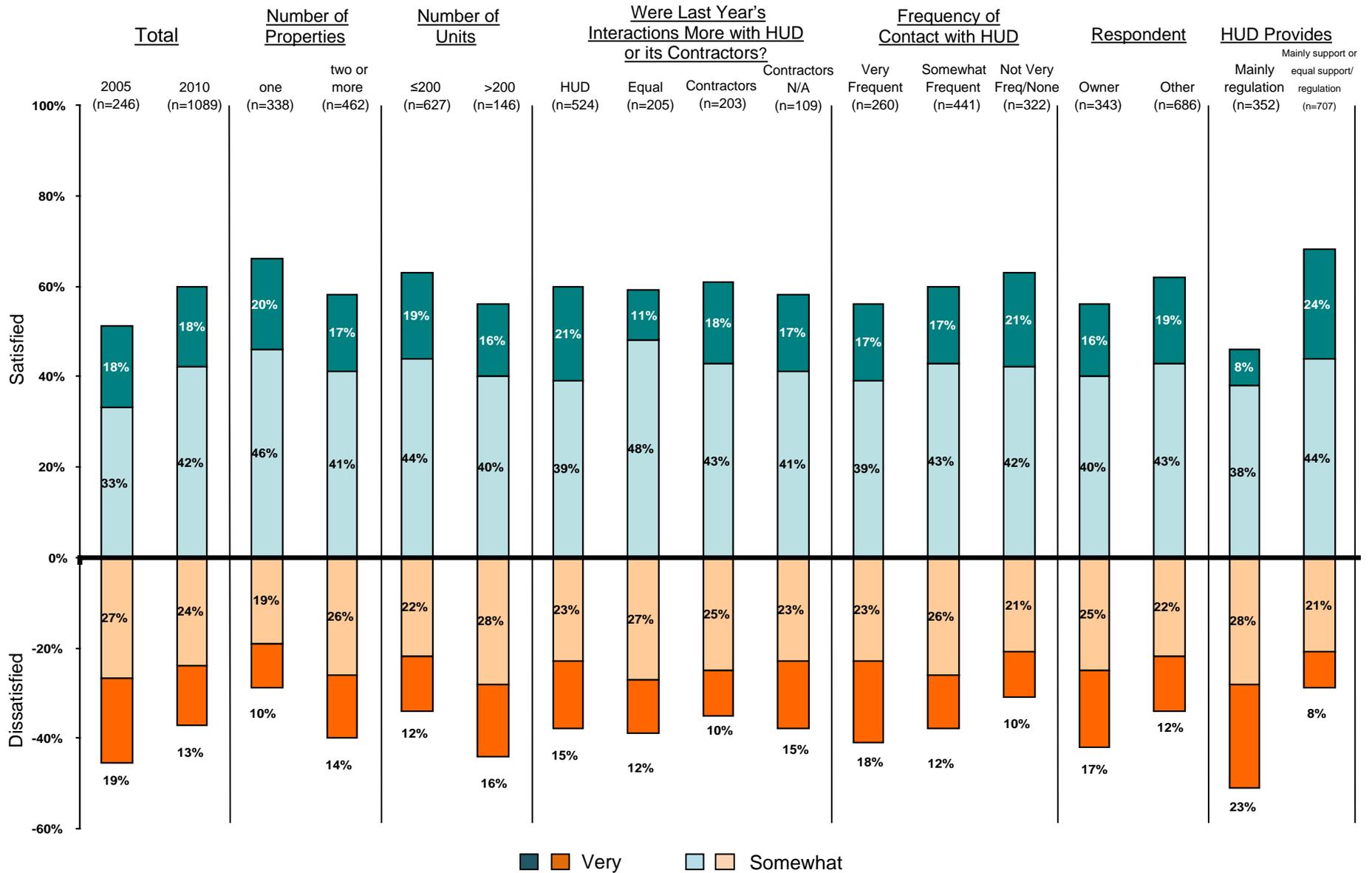
**Question 7a.** How satisfied or dissatisfied are you, in general, with the quality of the information you currently receive from HUD?



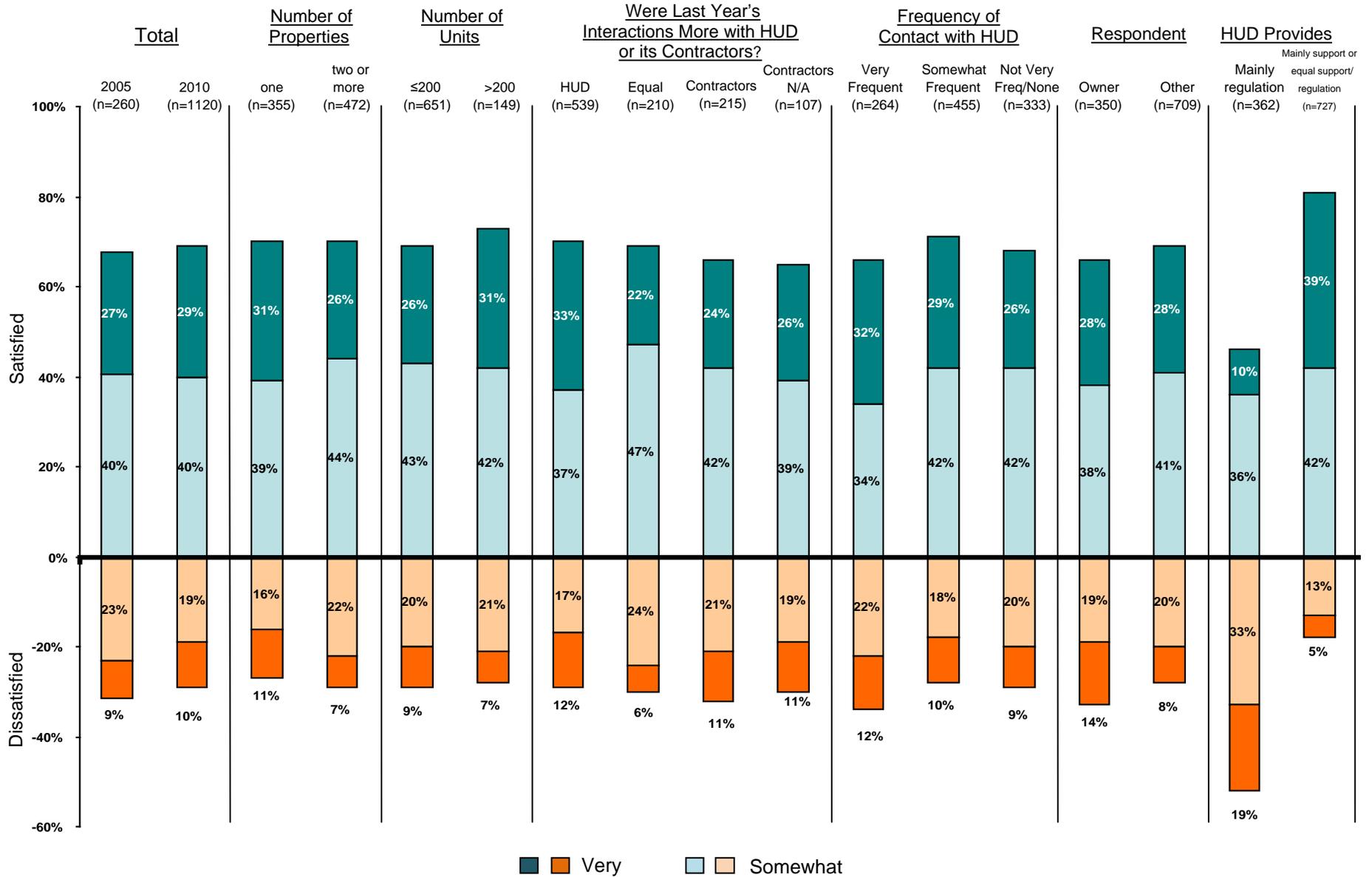
**Question 7b.** How satisfied or dissatisfied are you, in general, with the timeliness of the information you currently receive from HUD?



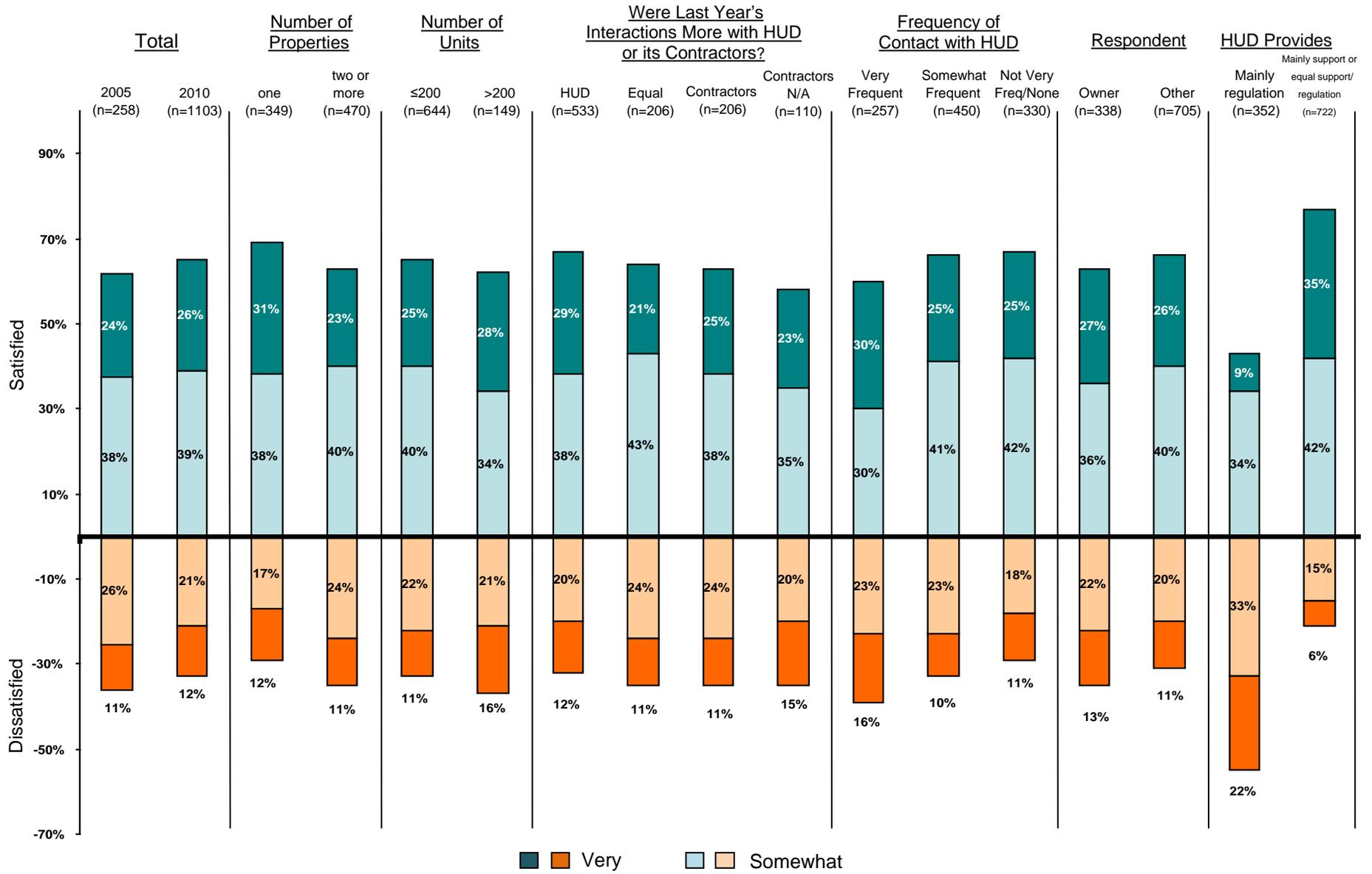
**Question 7c.** How satisfied or dissatisfied are you, in general, with the timeliness of decision-making by HUD (such as requests for waivers, rulings, and approvals)?



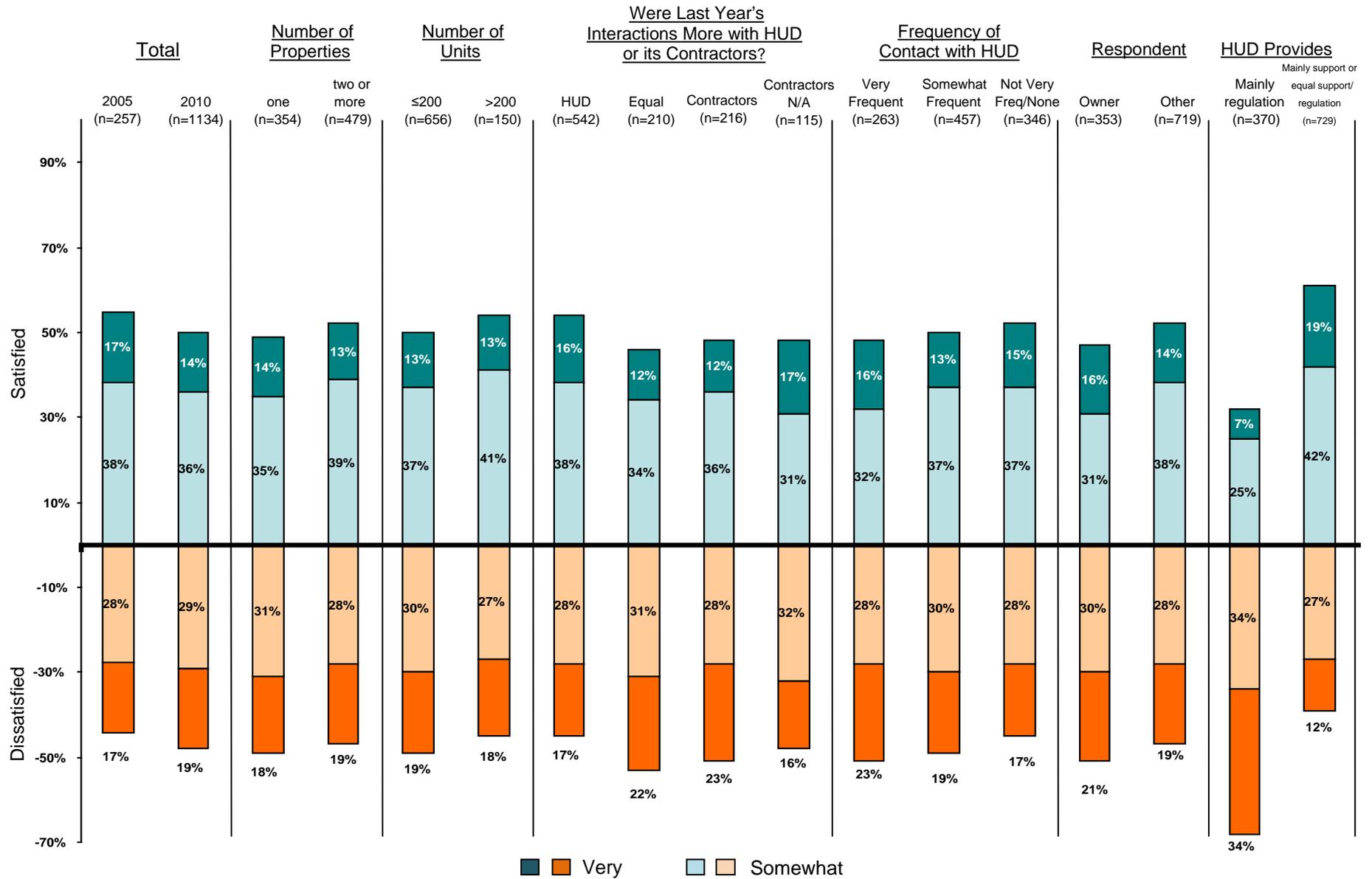
**Question 7d.** How satisfied or dissatisfied are you, in general, with the quality of guidance you currently get from HUD?



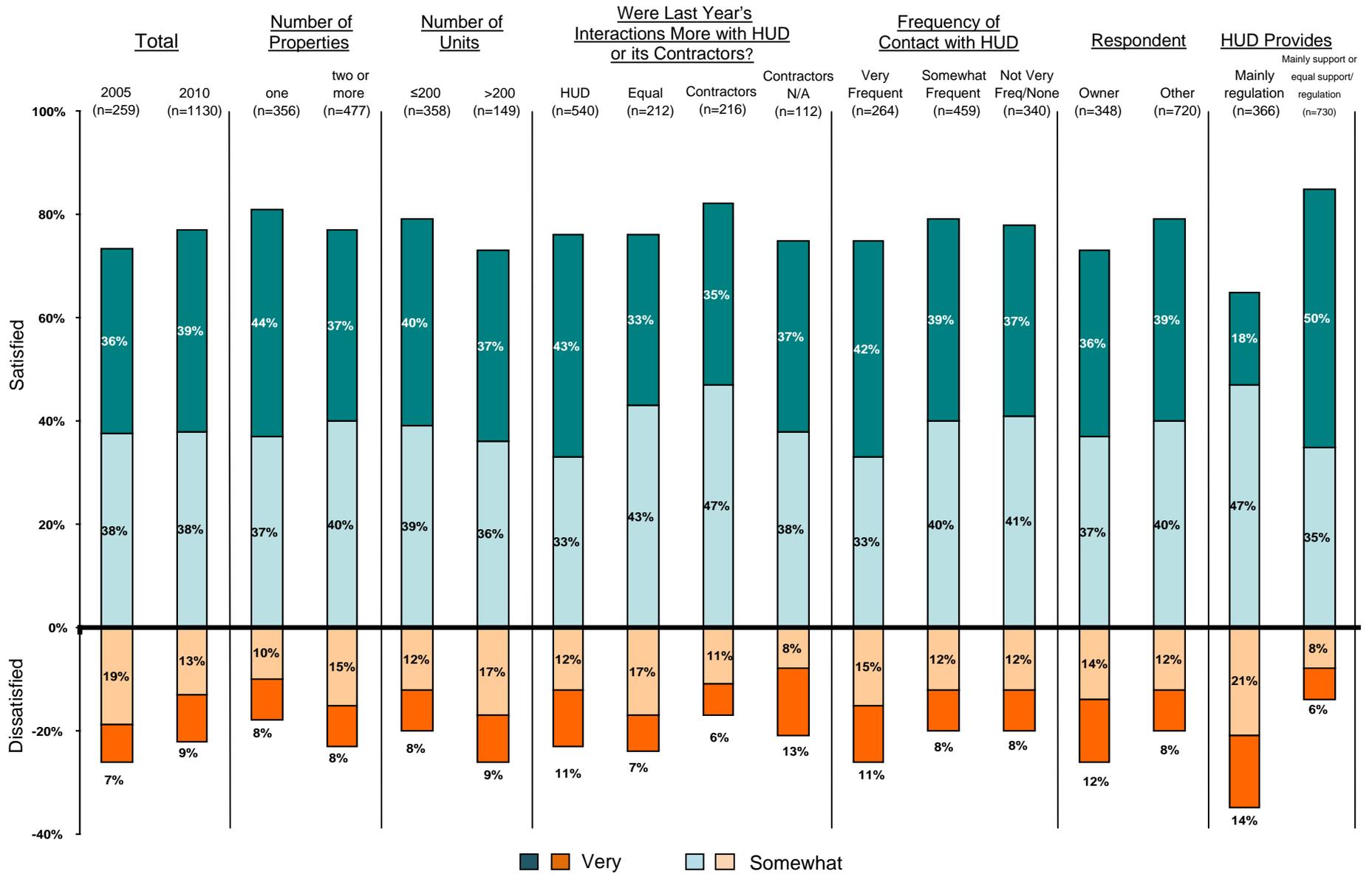
**Question 7e.** How satisfied or dissatisfied are you, in general, with the consistency of guidance you currently get from HUD?



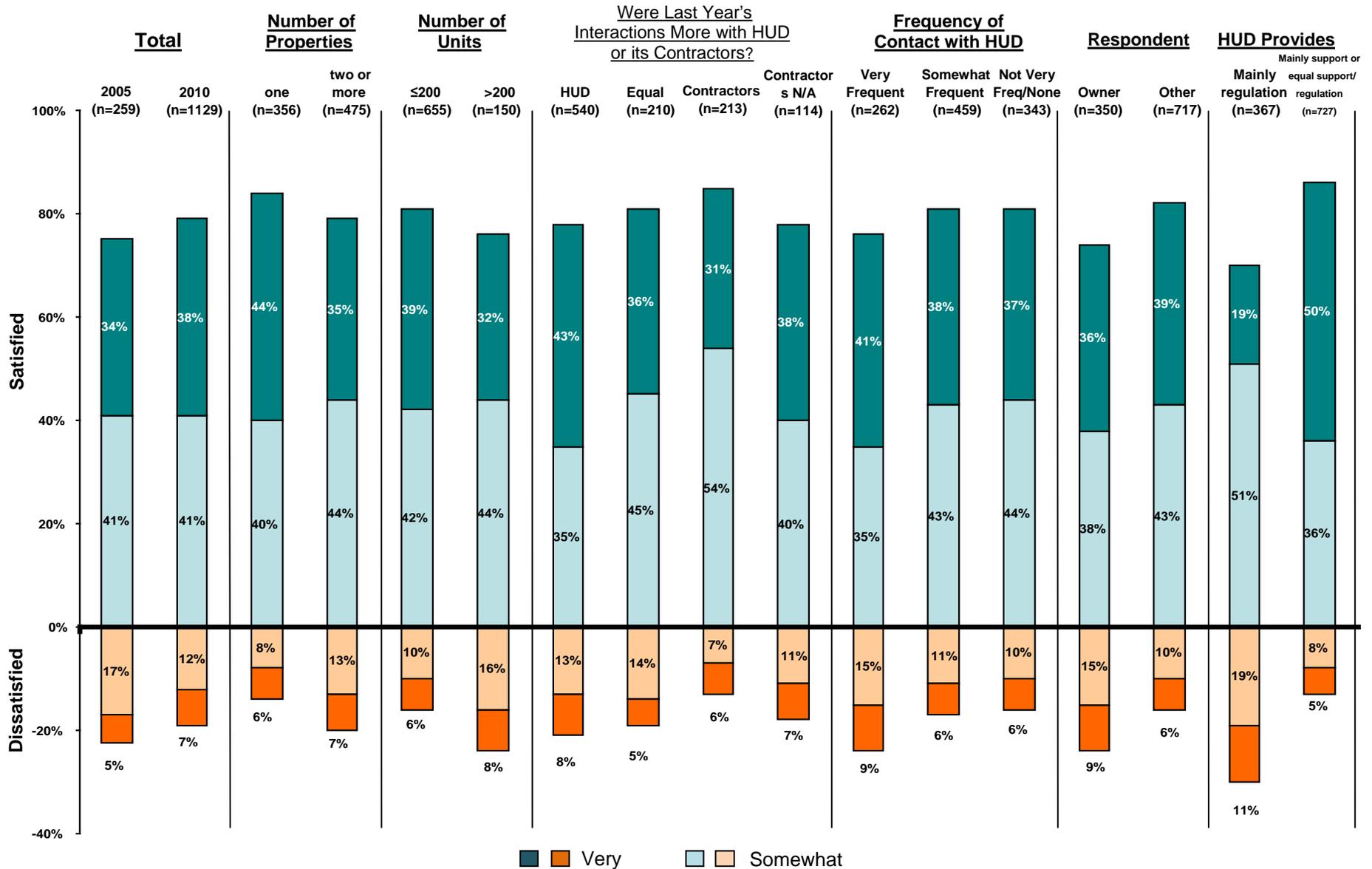
**Question 7f.** How satisfied or dissatisfied are you, in general, with the clarity of HUD rules and requirements that apply to your agency?



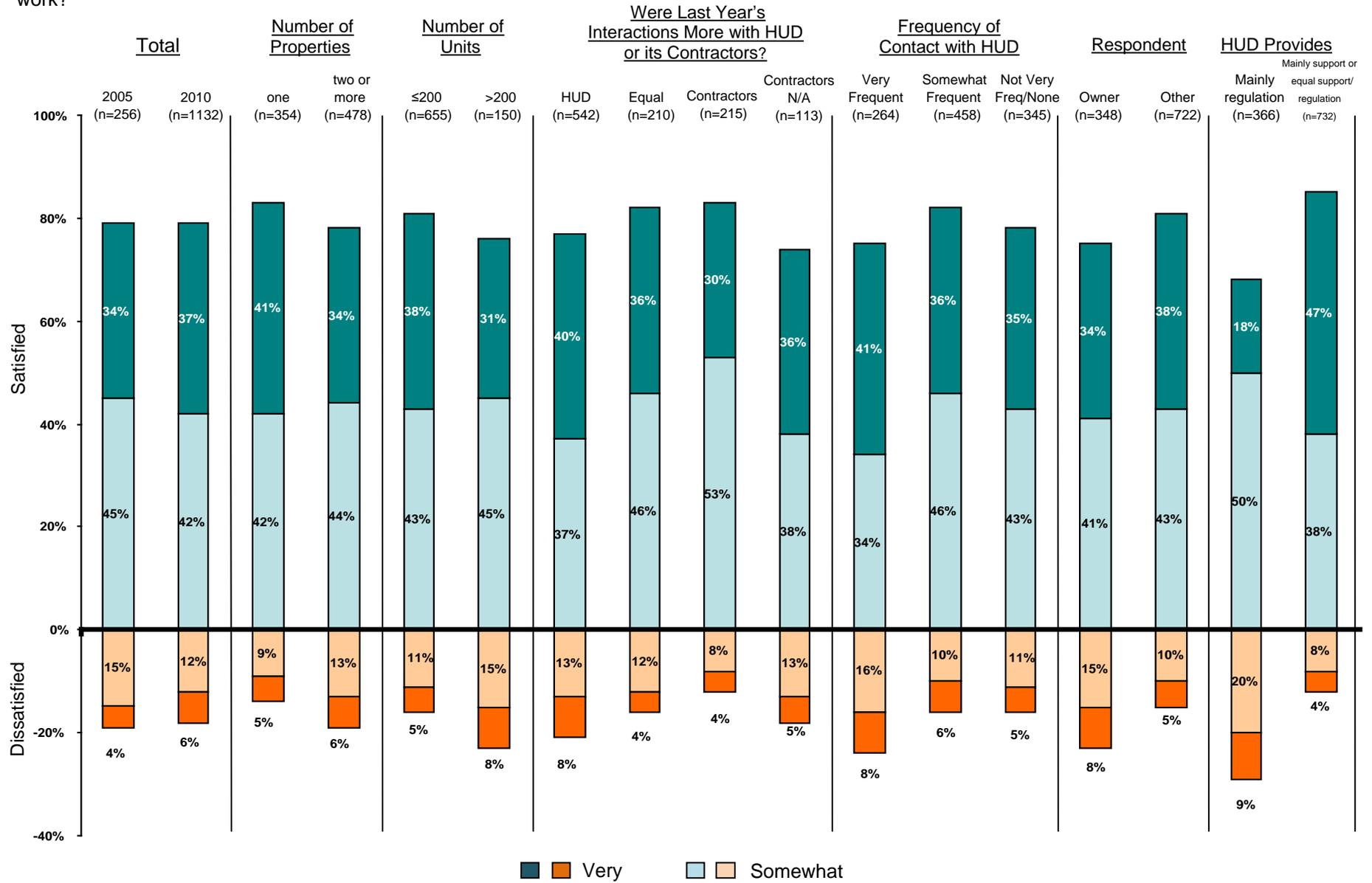
**Question 7g.** How satisfied or dissatisfied are you, in general, with the responsiveness of the people with whom you currently deal at HUD?



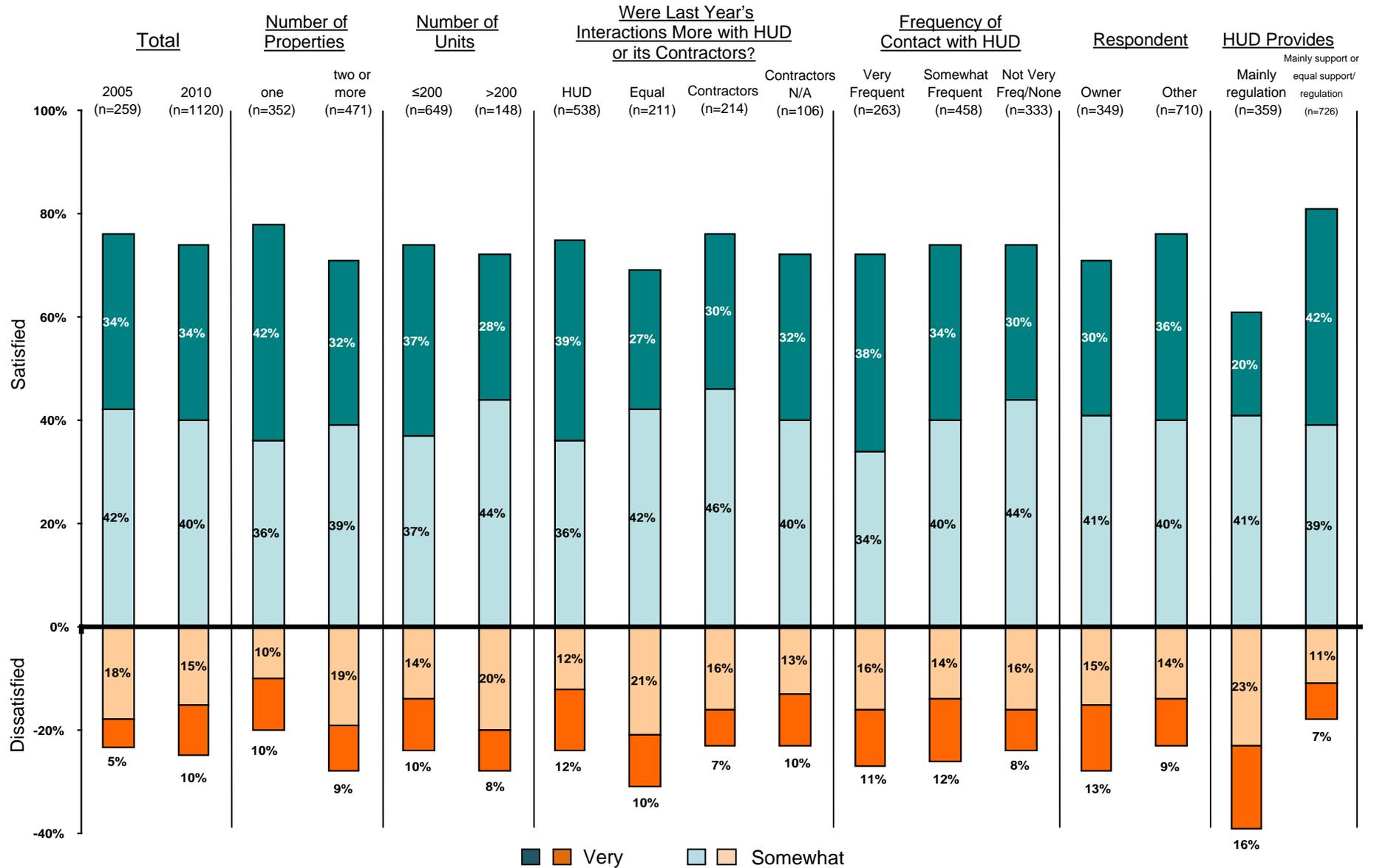
**Question 7h.** How satisfied or dissatisfied are you, in general, with the competence of the people with whom you currently deal at HUD?



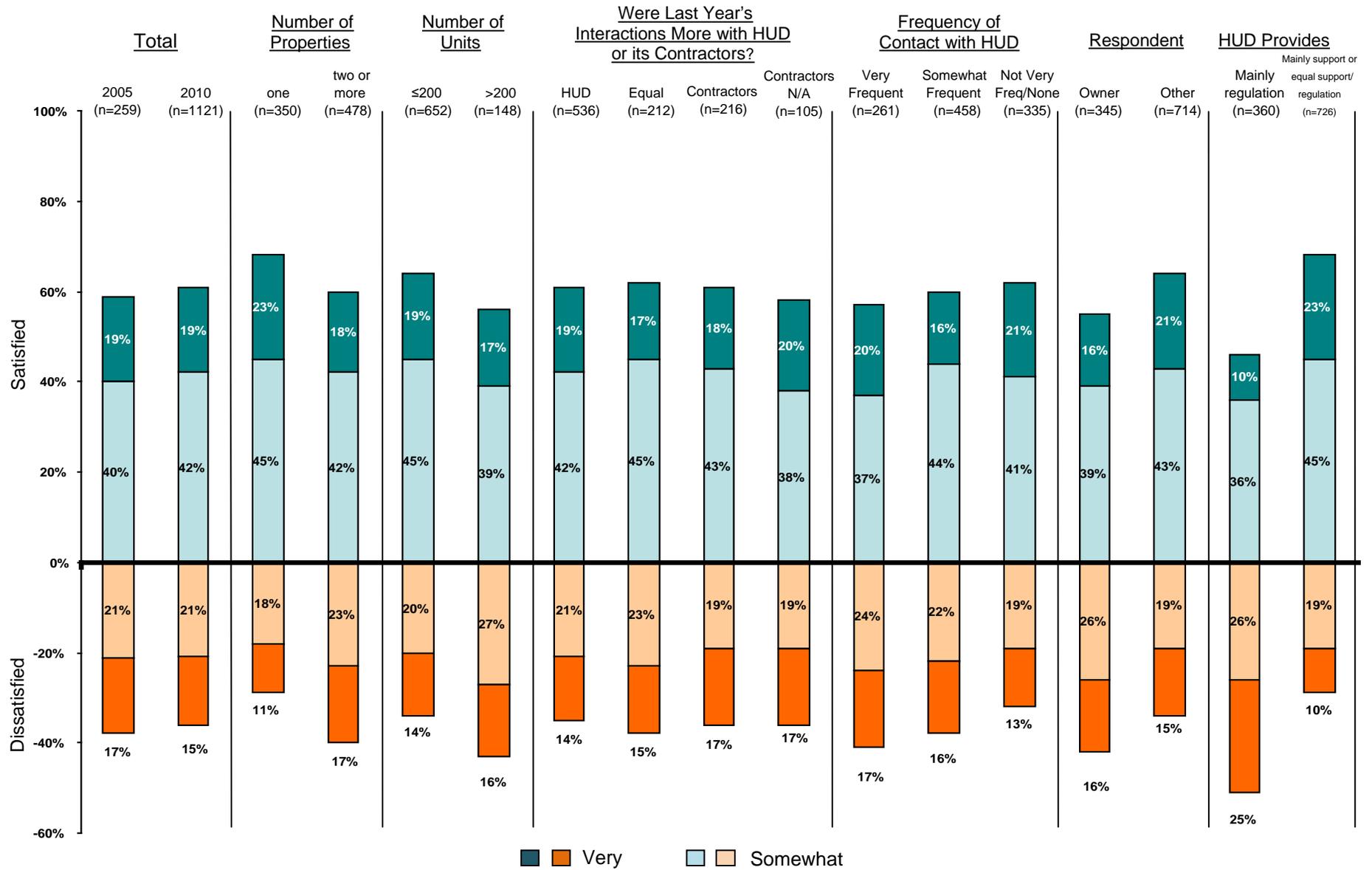
**Question 7i.** How satisfied or dissatisfied are you, in general, with the extent to which HUD employees have the knowledge, skills, and ability to do their work?



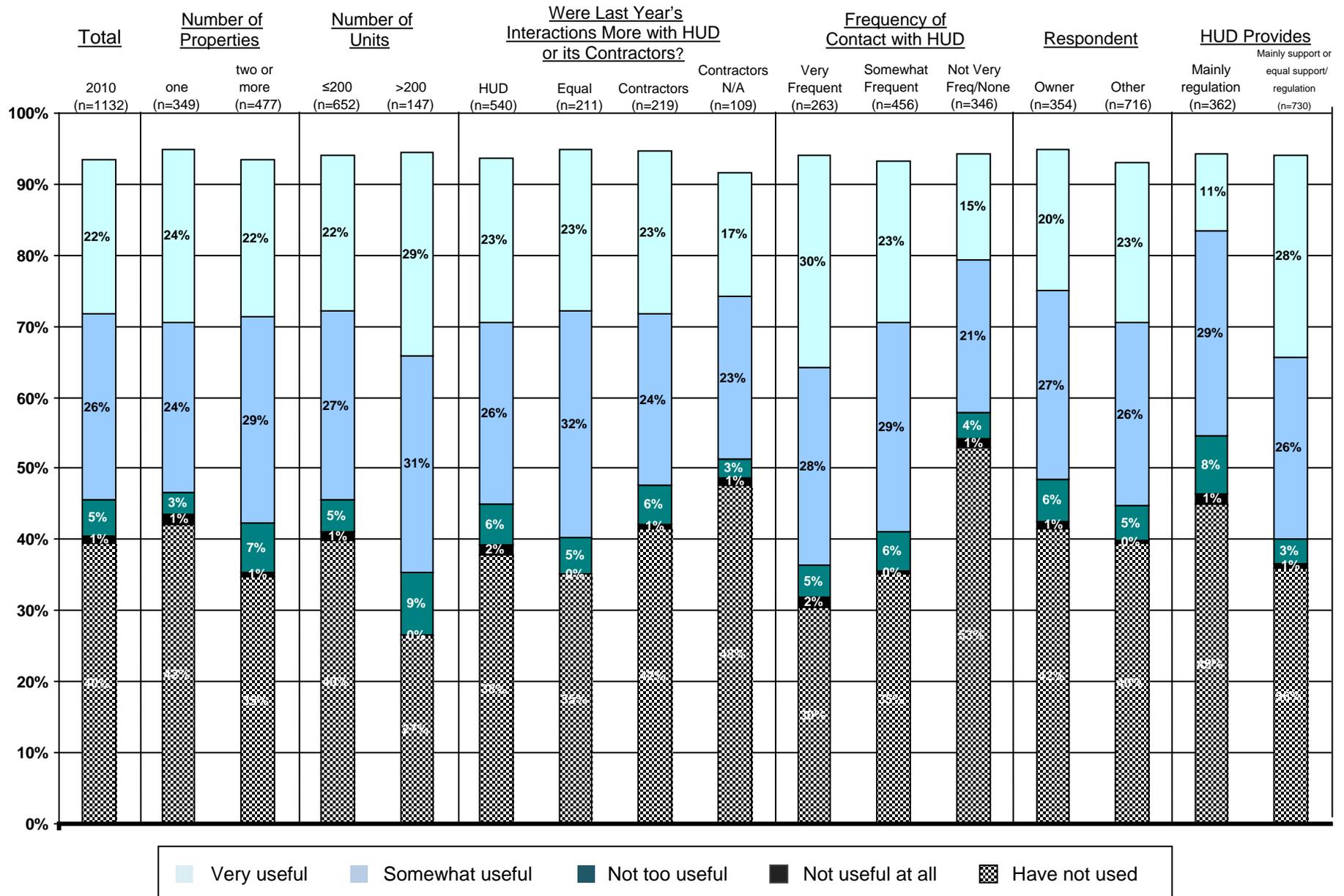
**Question 7j.** How satisfied or dissatisfied are you, in general, with your ability to reach the people at HUD whom you need to contact?



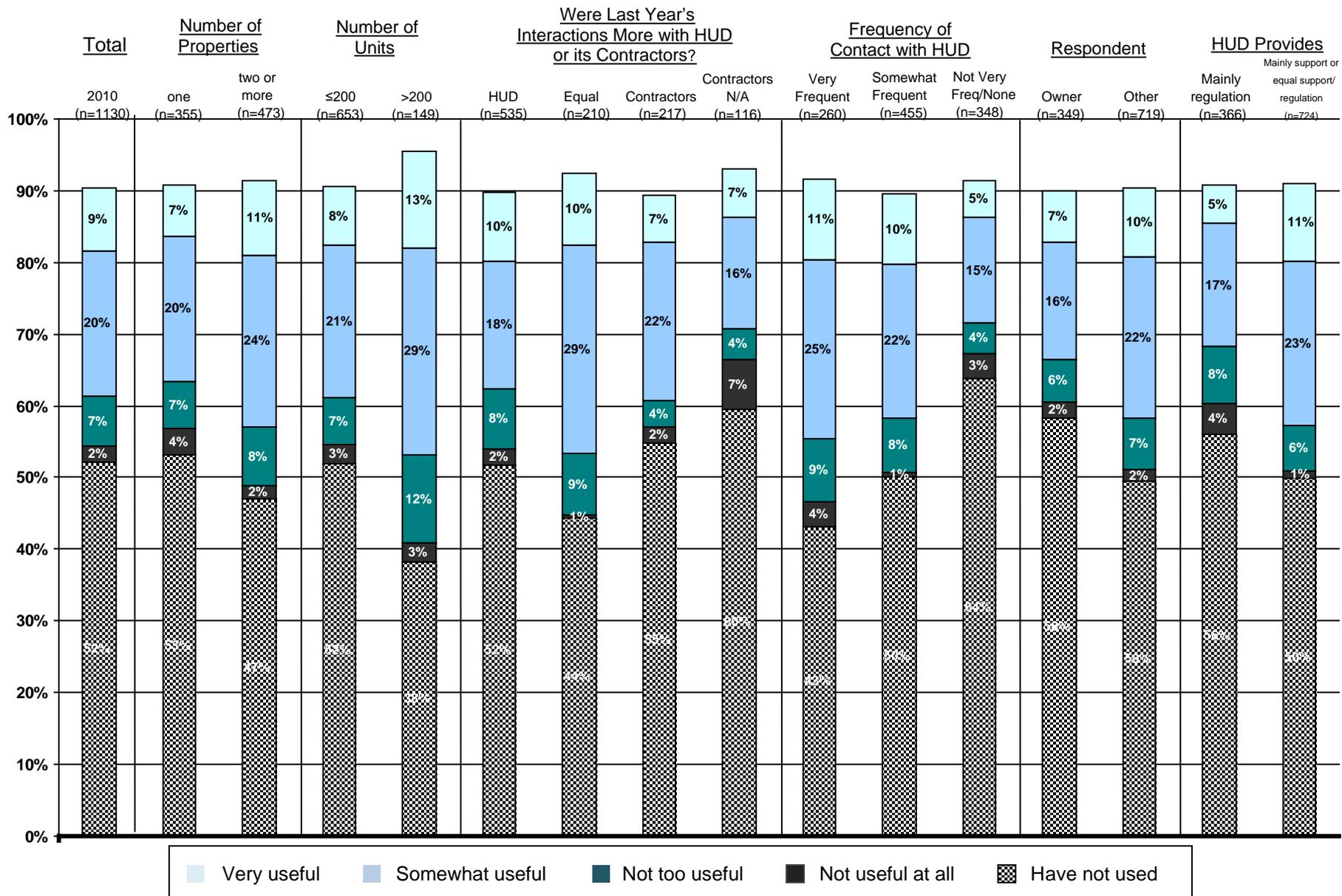
**Question 7k.** How satisfied or dissatisfied are you, in general, with the time commitment needed to comply with HUD reporting requirements?



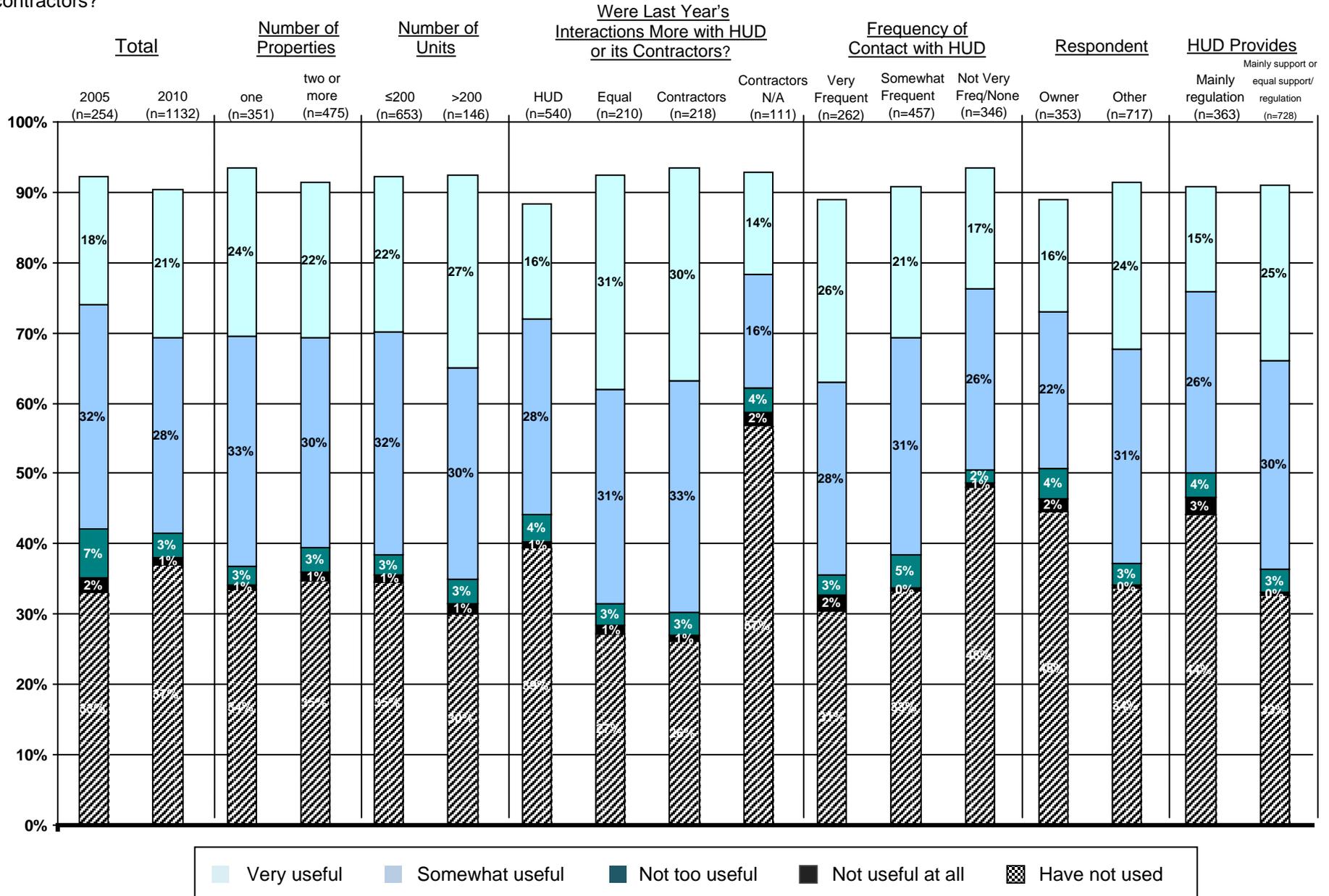
**Question 8a.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored conferences?



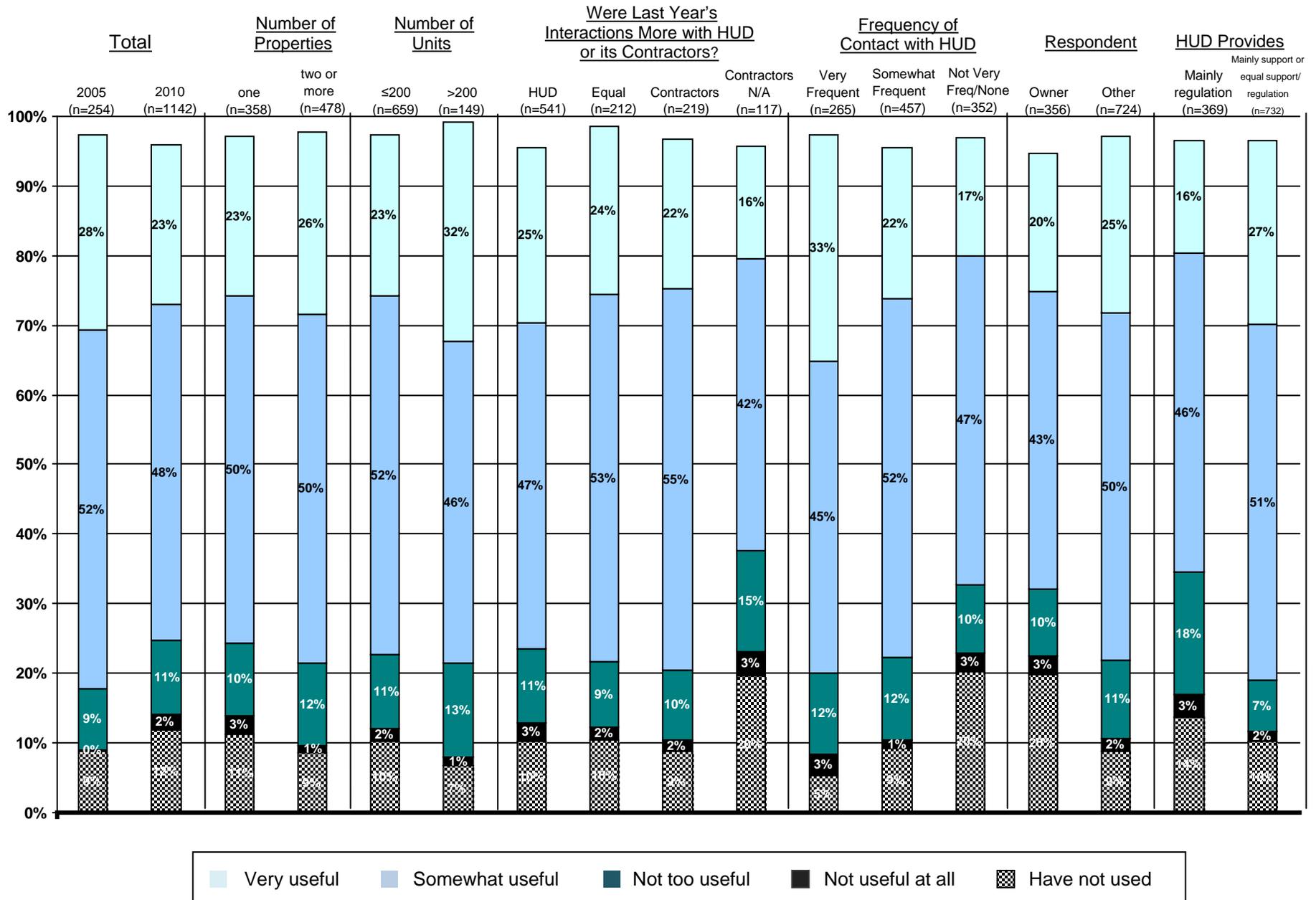
**Question 8b.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored satellite broadcasts?



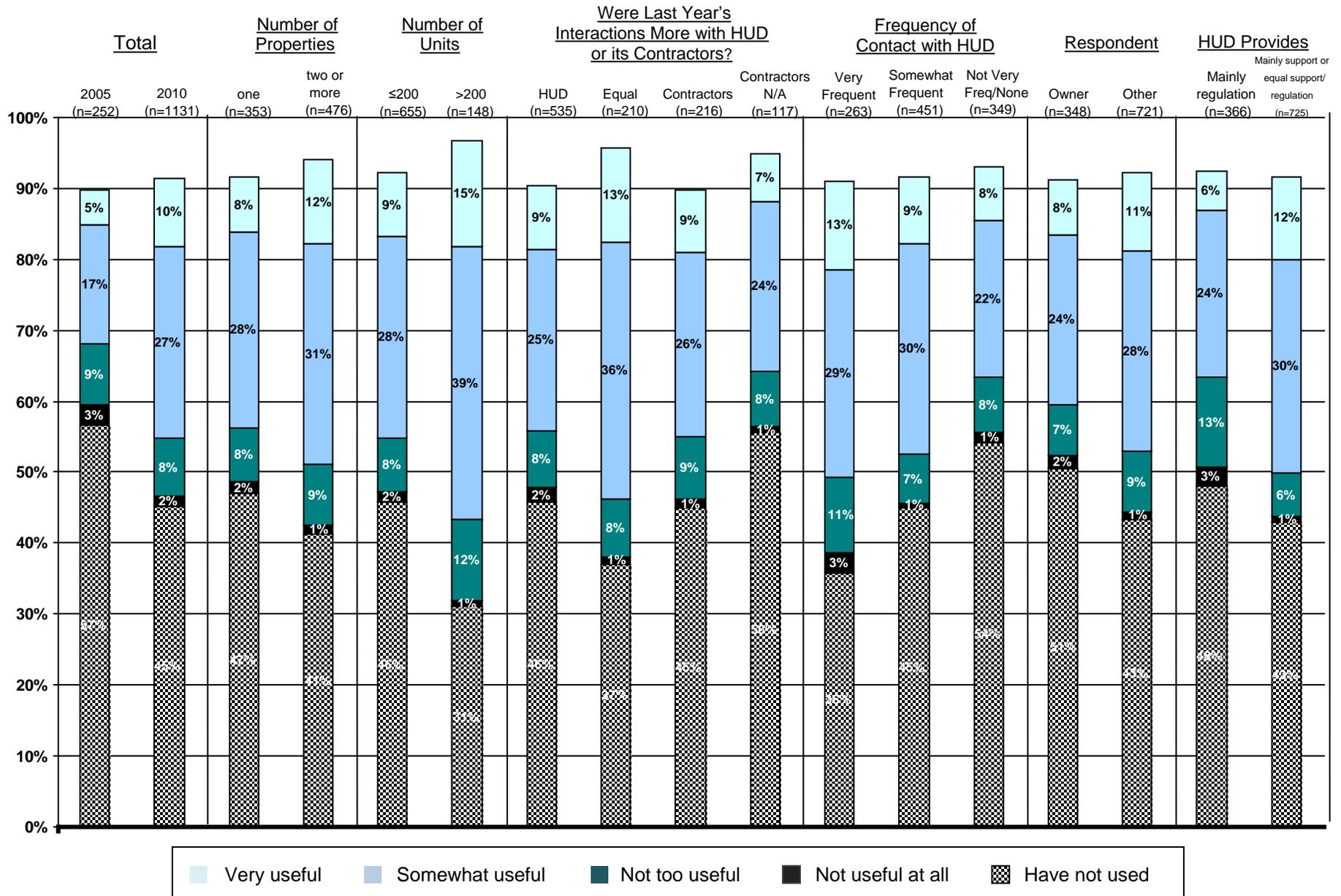
**Question 8c.** How useful or not useful have you found HUD's training and technical assistance through HUD-sponsored training programs conducted by contractors?



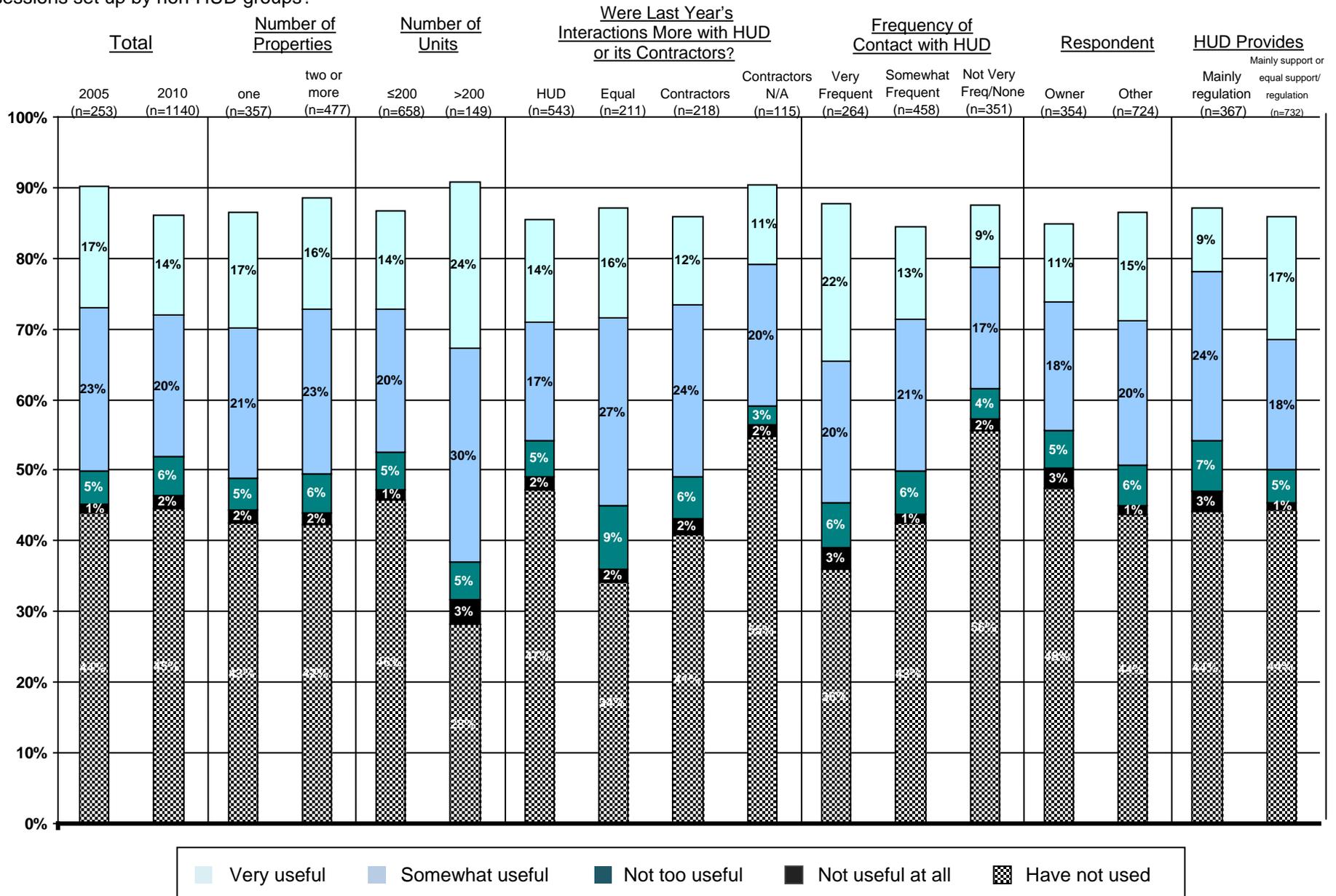
**Question 8d.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webpage?



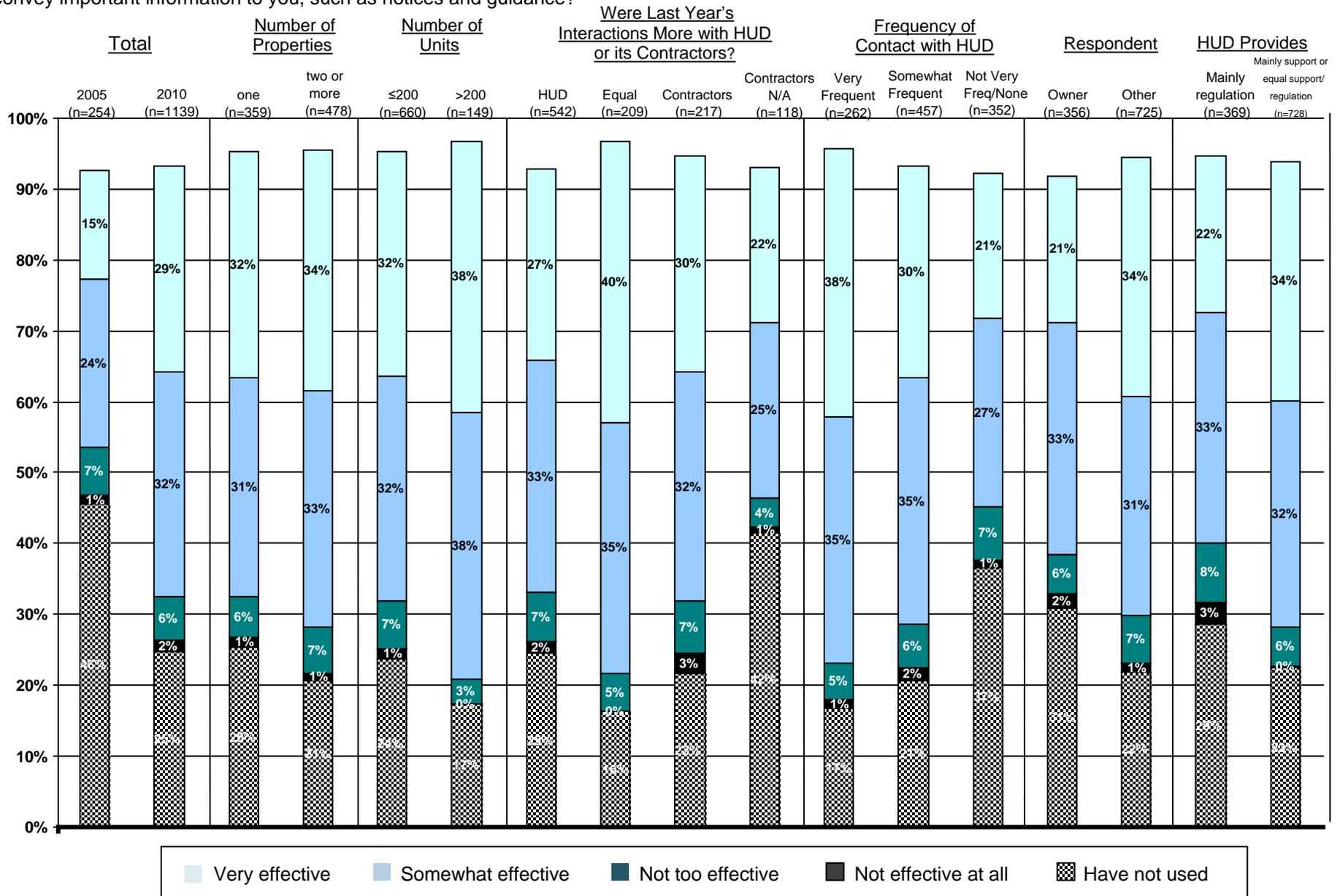
**Question 8e.** How useful or not useful have you found HUD's training and technical assistance through HUD's Webcast training?



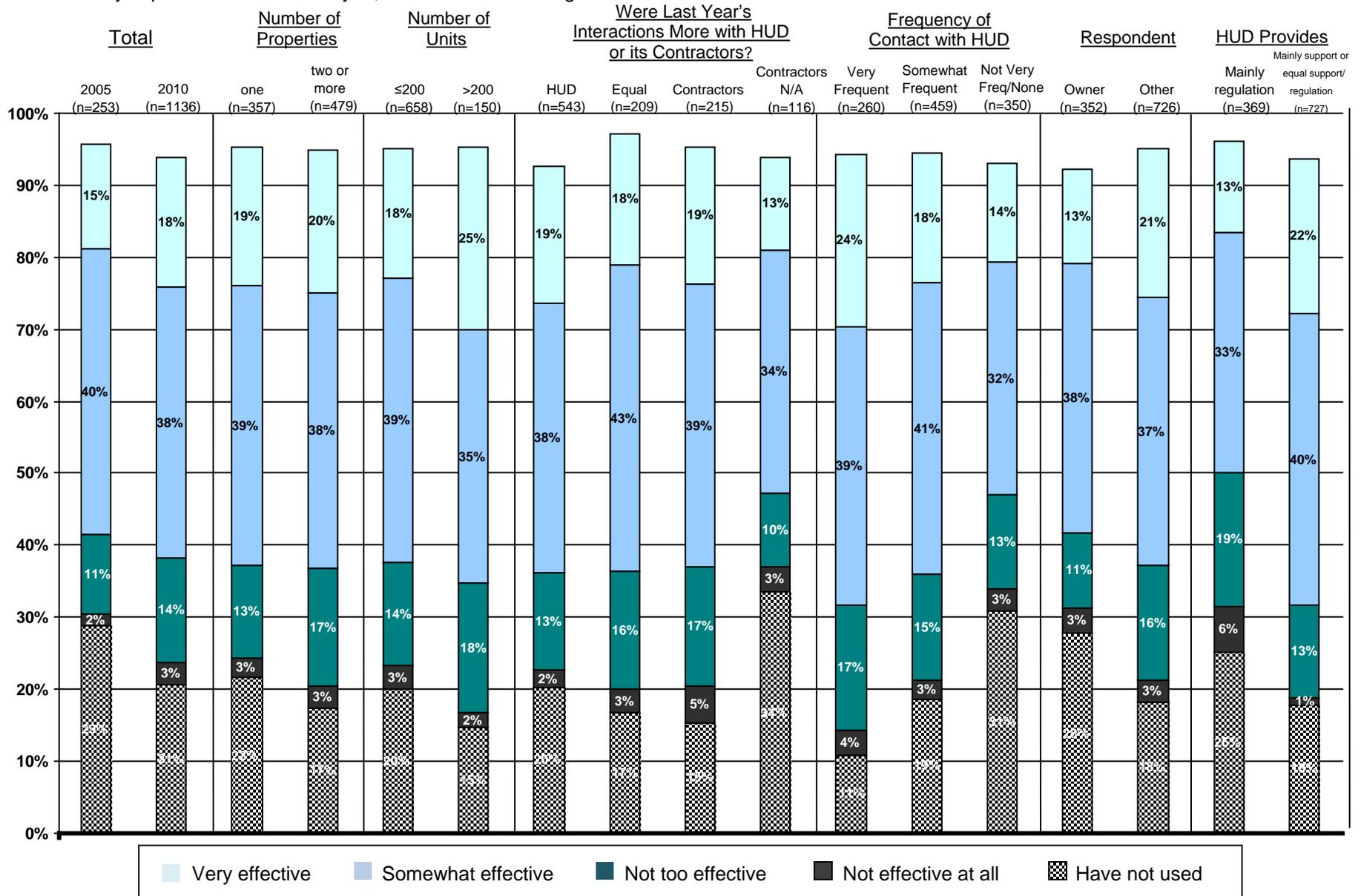
**Question 8f.** How useful or not useful have you found HUD's training and technical assistance through HUD participation in panel discussions and training sessions set up by non-HUD groups?



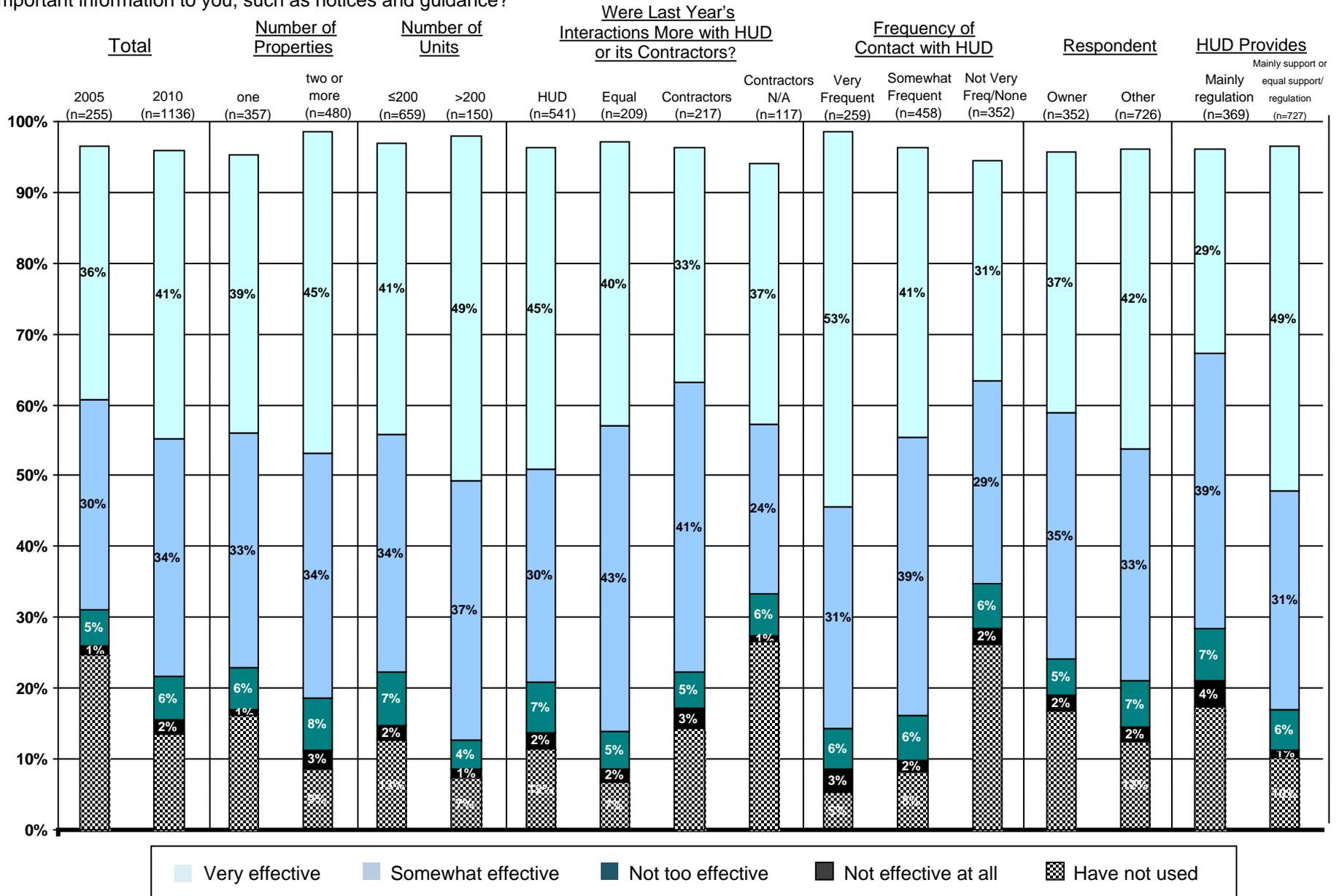
**Question 9a.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD listservs have been as a tool for HUD to convey important information to you, such as notices and guidance?



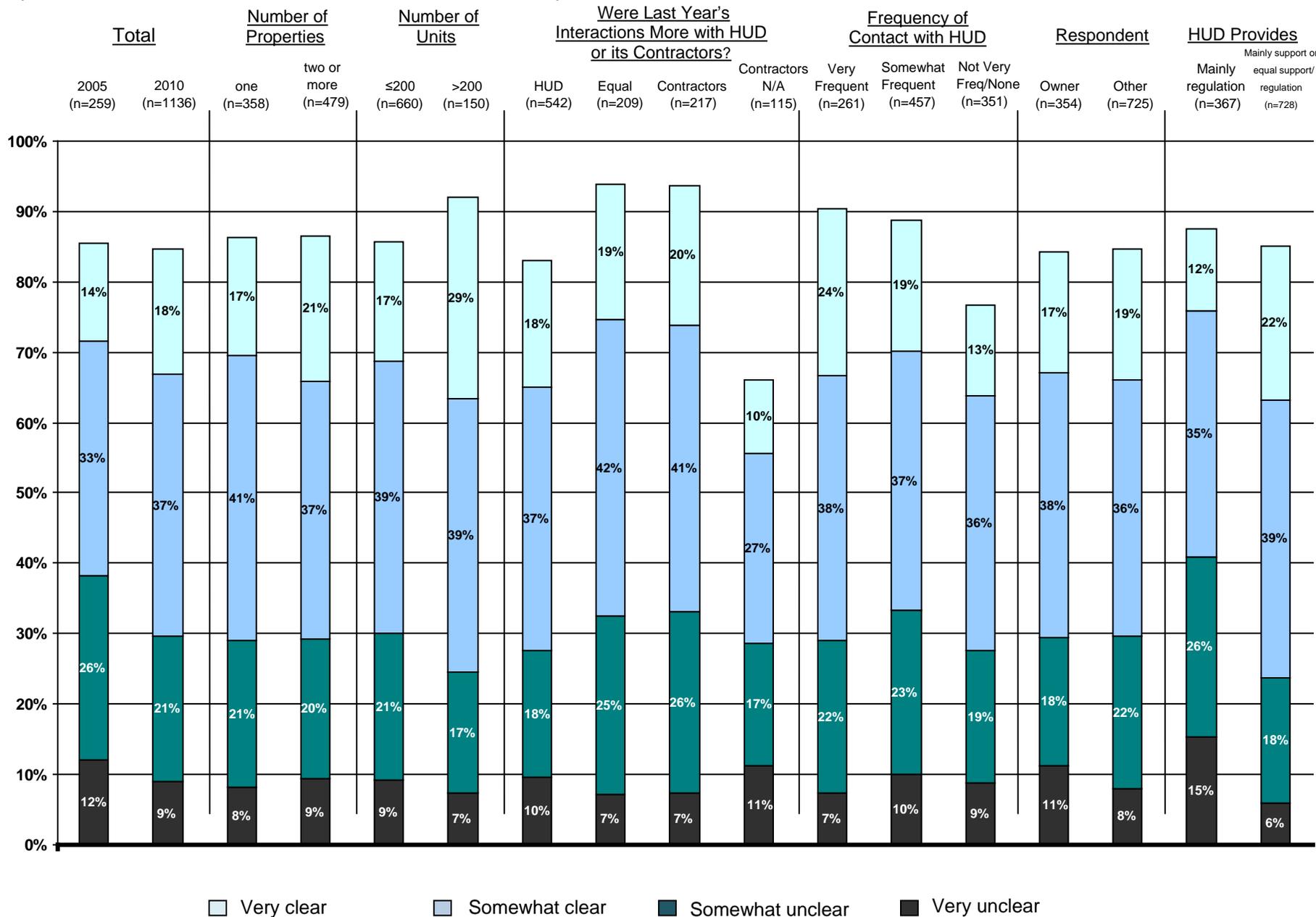
**Question 9b.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD website postings have been as a tool for HUD to convey important information to you, such as notices and guidance?



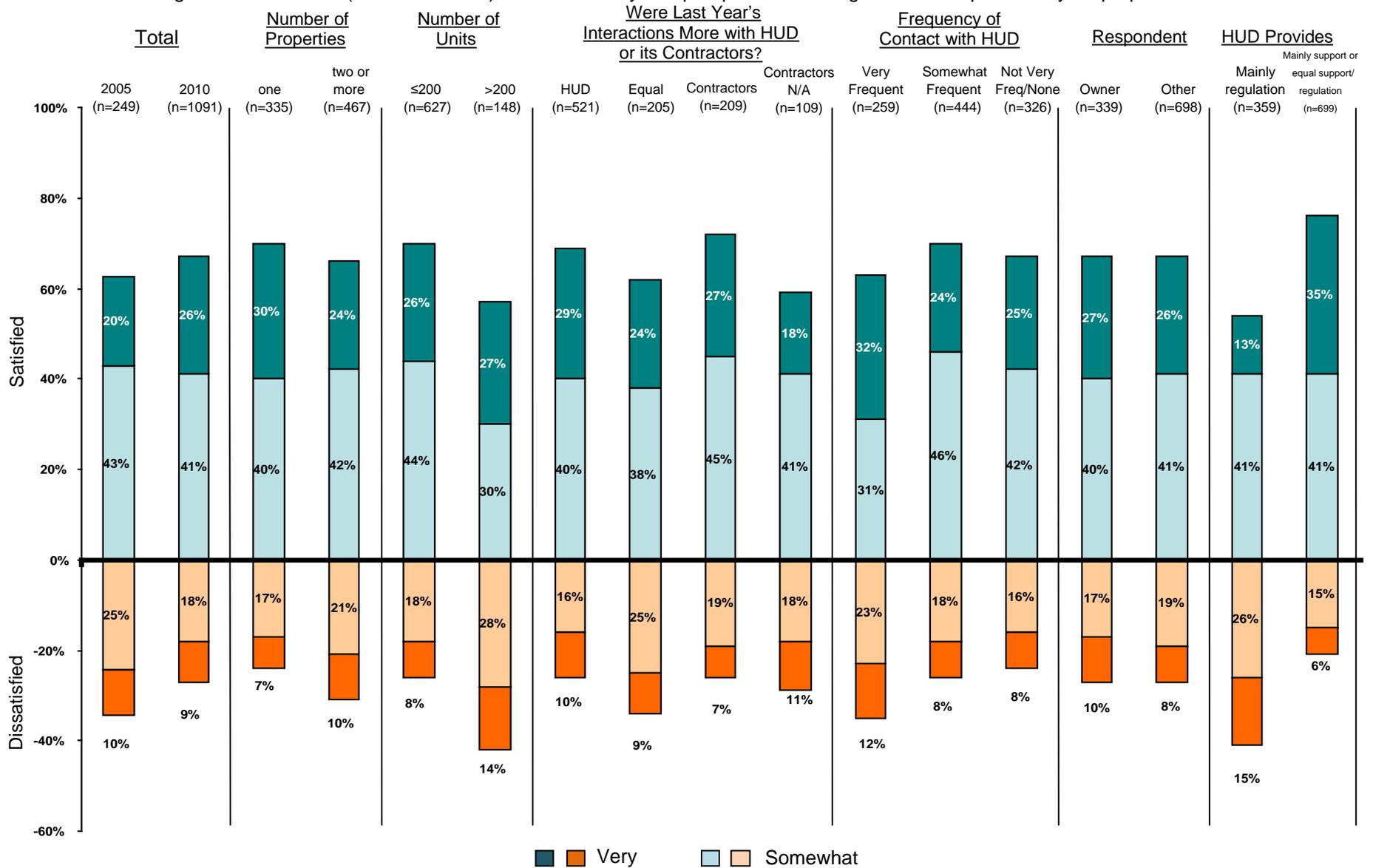
**Question 9c.** Based on your experience in the past 12 months, please indicate how effective or ineffective HUD e-mail has been as a tool for HUD to convey important information to you, such as notices and guidance?



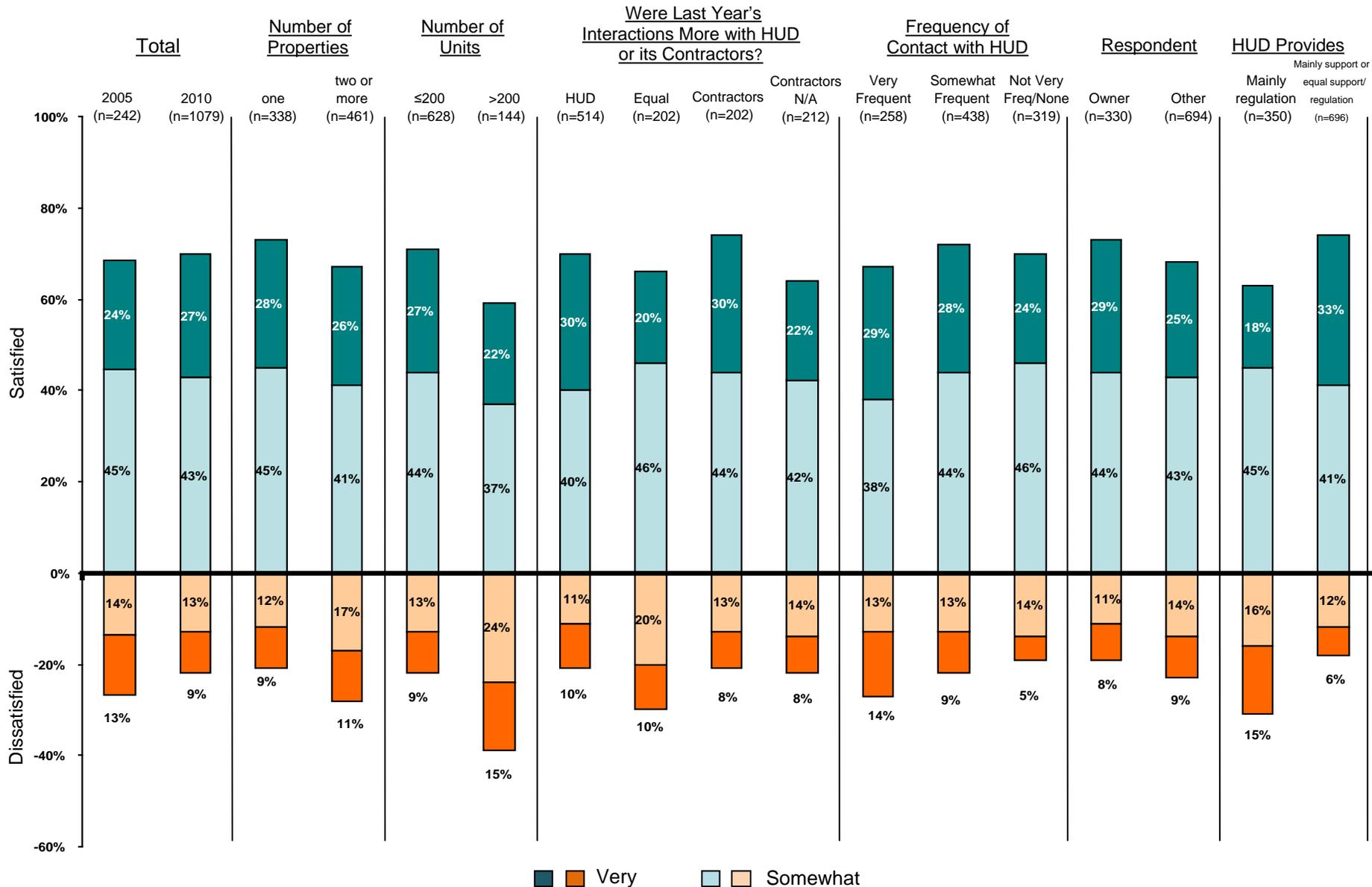
**Question 10.** Property owners may work with multiple HUD offices, hubs, centers, and performance-based contractor administrators (PBCAs) for various purposes. How clear or unclear are the different functions and responsibilities of these offices, hubs, centers, and PBCAs?



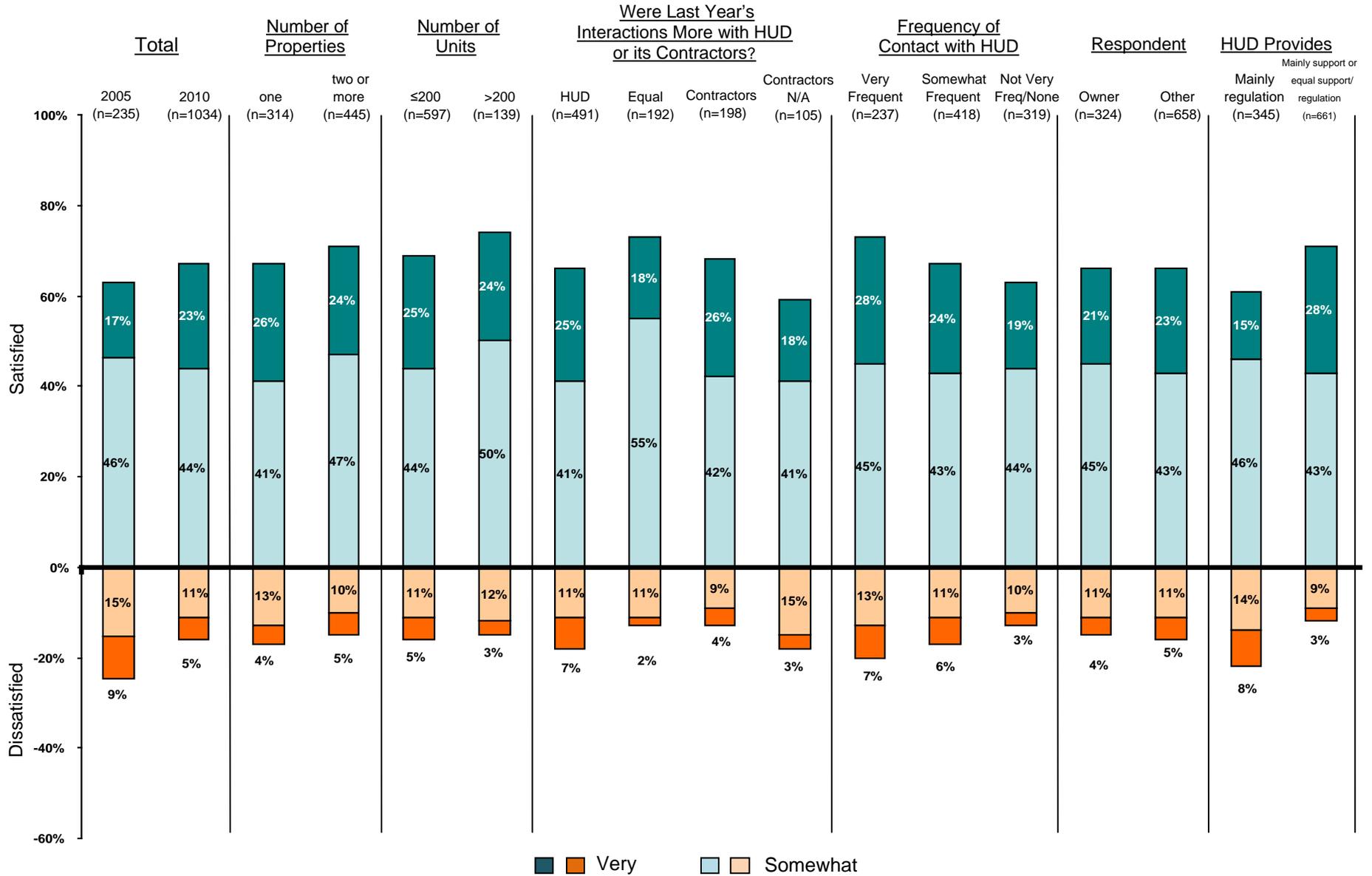
**Question 11a.** How satisfied or dissatisfied are you with the ability of HUD field office personnel—those in the multifamily hubs and program centers, and contractors working on behalf of HUD (such as PBCAs)—to consistently interpret policies and regulations that pertain to your properties?



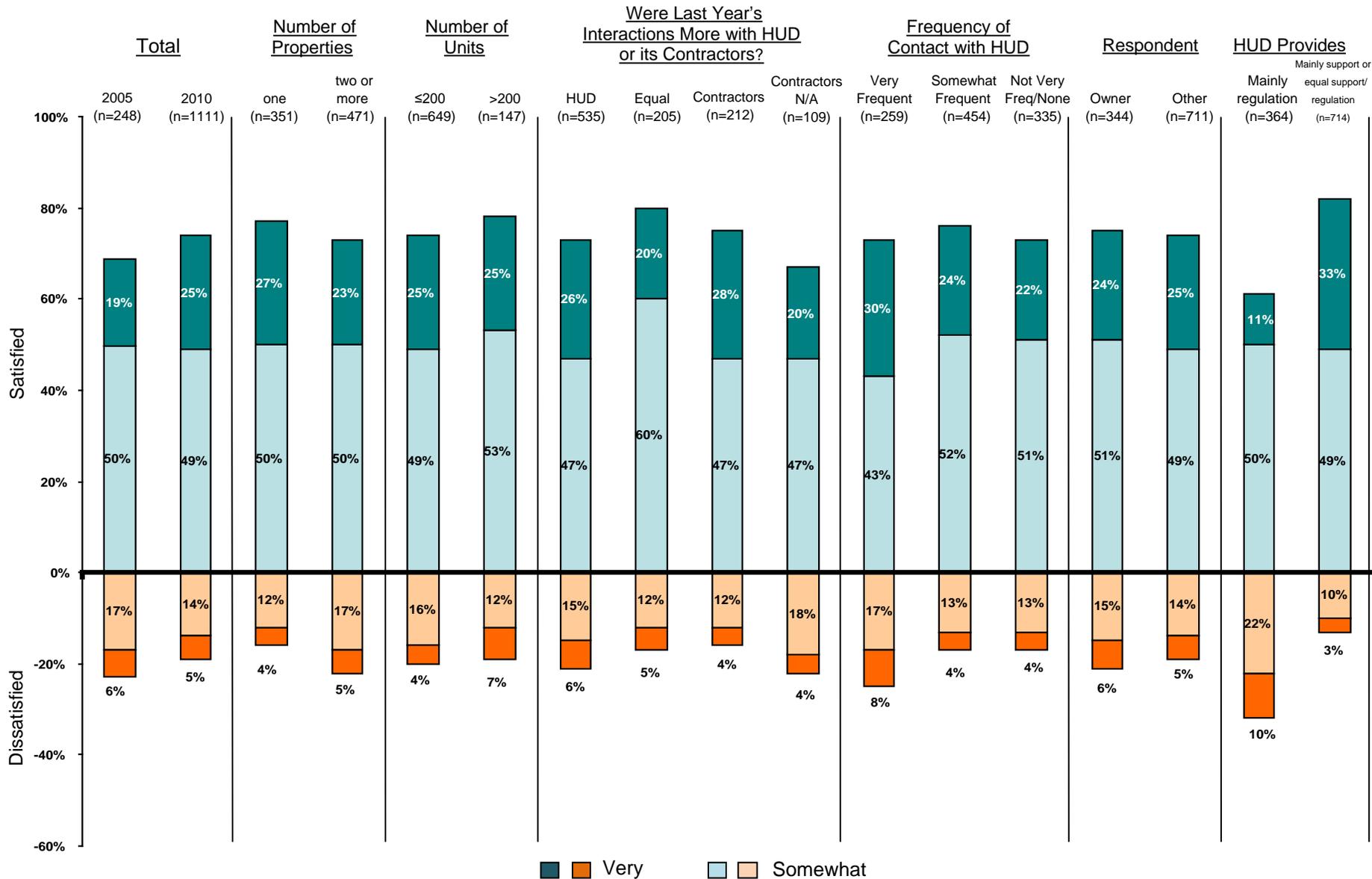
**Question 11b.** How satisfied or dissatisfied are you with the physical inspections by HUD's Real Estate Assessment Center (REAC)?



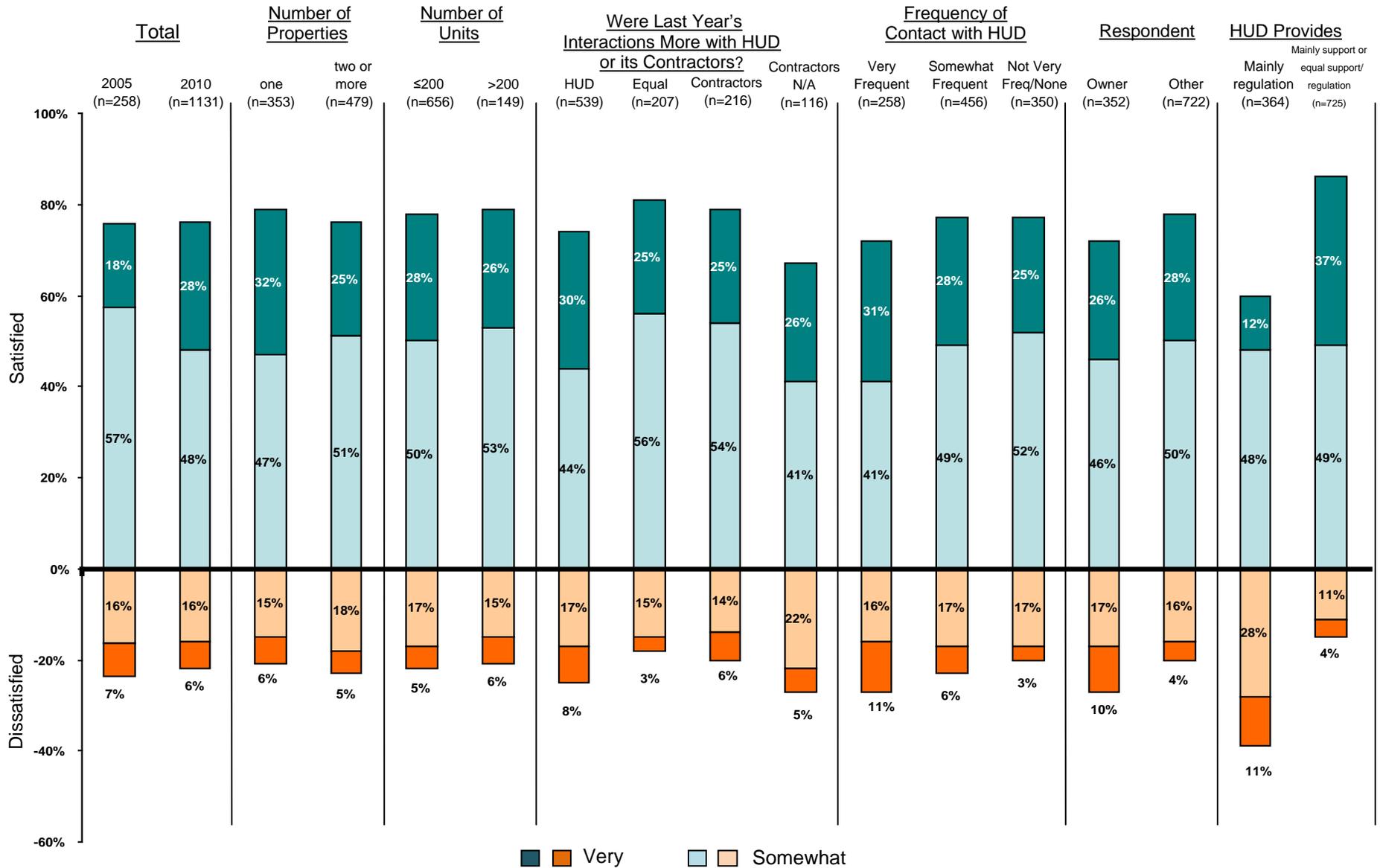
**Question 11c.** How satisfied or dissatisfied are you with electronic financial reporting to REAC?



**Question 11d.** How satisfied or dissatisfied are you with HUD's capacity to monitor and provide oversight related to your property or properties?



**Question 12.** At present, taking everything into consideration, how satisfied or dissatisfied are you with HUD's overall performance?



#### **PART 4: VERBATIM RESPONSES TO AN OPEN-ENDED ITEM ON THE PARTNERS SURVEY**

This section consists of respondents' verbatim responses to the last item on the HUD Partners Survey questionnaire, which read:

We welcome and appreciate any comments you may have about HUD. Please do not identify yourself or anyone else by name.

Many partners used this opportunity to address a wide range of issues, in their own words. Often they provided examples and explanation beyond what was communicated through standardized closed-ended questions. Since there is a large volume of information provided in these comments, readers are urged to use their browsers to search for key words or phrases in order to identify topics of interest.

The responses provided below are unedited except as follows. Respondents were guaranteed confidentiality when asked to participate voluntarily in the survey. This assurance meant that neither they nor their agencies, organizations, companies or communities would be identified in reporting the survey findings to HUD or anyone else. Accordingly, survey questionnaires and datasets resulting from them do not contain respondents' names or other identifiers. In response to the open-ended question, however, some respondents provided information that could conceivably be used to identify them, either directly or by deduction. As a result, the independent survey contractor redacted such information—replacing names of persons, organizations, agencies, offices, places, or other potentially identifying material with ellipses (...).

An example of deductive identification could involve the director of the only large community development department who was working with a particular HUD field office mentioning in his or her verbatim comments those two facts. Another example would be mention of the name of a HUD employee in the context of other information provided, which might result in identification of the respondent. Even though there are circumstances where mention of proper names would not likely be traceable to a respondent, a blanket policy of redacting the names of persons, offices, organizations, businesses or communities was applied. Responses appear as follows: ... from ... office is the best but ... is rude and nonresponsive; terminate ... 's employment since ... industry has no respect for him."

While it is recognized that redaction of names and other such information limits the utility of certain respondent comments, it was determined that the risks to respondents of deductive identification were greater than the value of including such information in the report. This determination followed from the fact that a significant number of potential respondents across the partner groups conveyed to the survey contractor their worries related to possible retribution or retaliation if their identities became known.

The fact that participation and frank and honest responses on the part of some partners were contingent upon an absolute assurance of confidentiality warranted erring on the side of protecting confidentiality. In sum, confidentiality considerations and concern for survey validity overrode concern about loss of information in dictating the redaction of potentially identifying information.

Below are verbatim comments from:

- A. HUD-assisted multifamily property owners;
- B. HUD-insured multifamily property owners;
- C. Section 202/811 multifamily property owners; and
- D. Owners of unspecified or multiple multifamily property types.

## A. COMMENTS FROM HUD-ASSISTED OWNERS

<p>HUD should work with the private sector to help solve disputes instead of automatically siding with the residents. HUD should work closer with the Management Agent instead of against the agent.</p>
<p>Please consider improving the APPS system. I would rate it very low in terms of user friendliness.</p>
<p>We work almost exclusively with ... . HUD contacts them to do their oversights here in ... Their staff is competent, fair and very supportive in our efforts.</p>
<p>Personnel that I've worked with in the ... field office or ... are very responsive and responsible. We are currently updating our facility from funds generated by refinancing. The processes for obtaining release of funds for projects is awkward, time-consuming, and not in tune with the way contractors do business and expect payment.</p>
<p>I think HUD has made tremendous progress in recent years in providing tools and systems to help owners efficiently meet HUD regulations. As with anything, it is still the people that make it work. There have been a few bad apples and unfortunately we know what that does to the barrel. Overall tough, not bad.</p>
<p>I am disappointed in the way the EIV allows for tenants to willingly and knowingly fail to report income without severe consequences. If a person fraudulently receives HUD subsidy, there should be more consequences for such. Termination of subsidy should be the first step. If these residents see that there is no real punishment for doing such, it allows them to continue. Training should be more thorough and more one-on-one training.</p>
<p>HUD regulations (MF underwriting – MAP guide) are somewhat unclear and open to interpretation. HUD should consider updating MAP guide.</p>
<p>... Field Office is very good and very responsive, especially ... and .... . ... at the ... office is awful. He is a long-time HUD employee who knows nothing and is very unresponsive on all issues. ... (PBCA) does a very good job. ... (PBCA) are always combative and hard to work with.</p>
<p>The people are friendly and do the best job they can given the ever changing regulations and endless paperwork. HUD should work on reducing the amount of paperwork required-most of which is unnecessary anyway.</p>
<p>The local HUD field office has been very supportive and helpful. There have been issues with HUD's electronic reporting that have caused many issues.</p>
<p>I am both an owner of a management company and owner of some HUD properties. Most of my dealings are through this HUD ... office (very little through HUD ... I have found the staff at HUD ... to be competent, helpful and responsive to questions/issues that arise.</p>
<p>Rules and Regulations cumbersome at times. New directives such as EIV a joke at best. ... in the ... field office is the most helpful HUD person I've ever dealt with since I started in this industry in 1975.</p>
<p>It is very hard to find HUD conferences in the ... region. Materials and handbooks are not thorough or easy to read. It's like a maze or puzzle trying to find information. A lot of documents refer to other documents and it gets confusing.</p>
<p>... and ... HUD field reps are very helpful and responsive. However, rarely do I get responses for our Rent Supplement Contracts. ... is excellent. ... Housing Authority is terrible to work with. Their reps are not very responsive and are difficult to work with. They are more argumentative than helpful with the exception of one individual named ... .</p>
<p>We have had a great experience working w/ ... and ... at ... Office.</p>
<p>I have found in my 16 years of dealing with HUD that (1) their front-line staff aren't always knowledgeable or well-trained, (2) I know more than my</p>

project manager most of the time, (3) HUD staff appear to be overworked and understaffed, (4) it takes way too long to get simple rent increases and reserve for replacement releases approved (well over 30 days), (5) HUD's standards for their PBCA's are much higher than the standards to which they hold themselves\*, (6) they constantly frustrate me. \*PBCA's tend to nit-pick files and have findings in areas that HUD doesn't even pay attention to. Thanks for the opportunity to vent!

The APPS and E2530 systems need to be easier to operate in!

Too many changes. All the time there are changes taking place, new rules and regulations. Hard to keep up with everything.

The amount of time it takes to receive a response from HUD is grossly inadequate. Rarely can one receive an answer when placing the first phone call/email to HUD. The "norm" requires staff to make at least 4 attempts to garnish a response from HUD personnel and then another few "reminder" phone calls/emails until an answer is given by HUD to the original question. It is evident that the staff at HUD is overworked and feels extraordinarily paranoid of their "bosses." It does make one wonder about the management style that exists at HUD. The multiple attempts our Company (and other Companies in the Industry) employees must make to achieve answers/results from HUD affects productivity and results in wasteful costs. It may be effective to bring more "private sector" Managers/Superiors into the fold to increase HUD overall effectiveness.

I am a property owner and manage over 200 rental units. Recently HUD had an outside contractor inspect a 12 unit apartment owned by us; this inspector made it a point to find every little violation she could. In doing so, she lost sight of the big picture. We have a beautiful apartment building and spent thousands of dollars in improvements. That was not good enough for the inspector. The units are all 2 bedrooms; We can get at least \$400 or more a month if we rented it to non Section 8 tenants. We are losing \$5,000 a month just for the privilege of renting to HUD tenants. HUD doesn't get it. They are doing me NO FAVORS by putting their tenants in my apartments. We are finished with Section 8 tenants. This inspection was so ridiculous, I don't need the headaches. When I brought this to HUD's attention, they said we should appeal. APPEAL WHAT? I will never rent to another Section 8 tenant again. I need to eliminate the stress in my life, not add to it with HUD's rules and regulations.

1. There are a lot of families who know how to beat the system. Once HUD receives any complaint valid or not, HUD does not ask the owner's side to explain HUD just automatically makes decision that owner is at fault. NOT RIGHT. 2. HUD does not promote any program to educate these families to respect the landlord's property as their own home. Lots of destruction goes on by the same tenants and their visitors; landlord is always helpless. HUD lease does not stand in local courts. 3. REAC inspections. Owners are held responsible for tenants' actions. Such as air conditioners in the windows. Furniture in front of windows in the bedrooms. Tenant has electric cords all over. Holes in the walls, window screens, two or three locks on entrance doors to Apt, Doors off hinges due to too much stuff in the closets. List goes on – we always thought that Section 8 programs are a partnership between Tenant, Landlord, HUD and Local Economic Development Office.

Our only contact with HUD is ... office-very nice people.

We own a (one) 30 unit Section 8 senior apartment building. We use a third party for our TRACS reporting. We have been very happy with all of the HUD representatives we have dealt with. The only issues we ever have related to the excess time involved for things such as the CCR registration – which did not apply to us at all. Getting set up in the EIV system was also a nightmare for us with all the phone calls we had to make. There were no clear instructions and even our HUD field rep had to look into many of the questions we had. The help desk did not return calls for weeks. It seemed they were overwhelmed when we spoke to them. The only other issue we have is the constant changes that must be made to leases and tenant selection criteria. Maybe a standard form needs to be used. It would save lots of people's time. The upside to these is the HUD people we deal with are always helpful and pleasant to work with.

For the past 5 years, we have been working closely with HUD in ... office. They are very responsive and ambitious. For the third party (HUD's

contractors: ...) we have had deals with them; and somehow they should be aware of the property background. They should be consistent with the way they give a rating to the property compared to the other.
I feel this is very important to the managers and managing agents. When HUD changes or updates a lease agreement, it MUST supply a SUMMARY of the changes along with the new lease. Paying an attorney or other agent to review the new lease and determine the changes can be very costly. The last lease change cost our property over \$3,000 in review and reprint costs. This is an unnecessary expense.
We have several excellent contacts at the ... office who always provide prompt responses and are all helpful. Lately these have been isolated individuals with new individuals who have not been as positive. Our response time and the helpfulness of staff members at headquarters have been less than positive. It sometimes takes months to hear back and we do not get answers when they do respond. Our CAs are very thorough and helpful but are not consistent from state to state. Recently, they have started creating their own rules and requirements, which is very frustrating. When we do question what they are doing (with HUD), there is often no response.
Trainings are too expensive, thus cost prohibitive. It is difficult to stay abreast of forms and procedures as they are always changing. I recently spent a day attempting to fax a document to HUD using the fax number listed on the form titled (?) requested and registration, 202--... and was unsuccessful at doing so. Finally when I reached someone it was canned. When we recently moved our corporate office I had to complete multiple documents and sent emails. I understand more may be needed for what should have been a simple change of address.
HUD ... Multifamily has sacrificed personal attention and inter-action with agencies it serves by giving these responsibilities to contractors. I have lost all contact and personal help with my multifamily office.
Not notified of change in Project Manager. Paperwork held up for several weeks due to change in Project manager. Project managers should visit project to have knowledge of property needs so they are able to respond to issues and capital needs. We currently have a \$150,000 landscape project that needs to be done and not enough R & R to cover it. Project manager not able to provide assistance to address problem.
MOR has become a real hassle. Very demoralizing to one of our best employees who took on this project last year and put in an enormous amount of effort, only to get a non-satisfactory score on, in my opinion, very nit picking details. For example, correcting a recertification for a 50 cents income difference that did not change the resident's rent. Feel MOR should provide assistance – wrong approach instead of making a big deal out of small mistakes! Paperwork load has increased significantly since I started – lots of redundant forms for instance the Annual Recertification Initial Notice confuses residents!
HUD micromanages too much on a monthly accounting basis. We are audited annually and produce financial reports in an acceptable financial format and following acceptable accounting practices. The monthly reports required are unnecessary, redundant, time-consuming and impractical.
We pay good money to have a rent comp study done by a firm that has been approved by HUD. Then...HUD has another one done by a different firm...seem a waste of government dollars. We should be emailed or mailed when there is a change and should not have to find out through an independent newsletter.
We deal with our local Field Office in ... more than anyone. They are always very helpful and supportive – not to mention reasonable when it comes to deadlines etc. My only issue with HUD programs is the contractors used for multi-family (...). These audits are almost to the point of ridiculous. They have unreasonable demands and they are not supported by HUD regs – rather by different auditor preferences. Making tenants initial all new forms just because a date in the corner was changed – all pertinent information was the same – is unreasonable. These types of actions can be done at re-exam. ... insists on immediate action to all their demands.
Most of the dissatisfied answers related to a request for a waiver that took over 9 months and had to go to an area manager to get an answer. No

one was returning our calls/emails.
I appreciate the help I get when I can actually talk to a HUD employee. Email is better but is slower than phone. I detest receiving notification that a report is due within the next few days – this has happened 3 times this year. No earlier notification was given. What if I was on vacation? I detest the thumb on my head in REAC. I understand why and do keep a great property. One unnecessary citing dropped my site score from 93.9 to an 80.6. Please fix this absurdity. And the anal-obsessive REAC inspectors who won't allow anyone to get a 90 or above because they're afraid to lose their job. They need to. The contract administrator's job is "gotcha." No one is happy with them and I hope they lose their contract this year. No HUD people have helped with oversight on them. We are the victims. If we treated our residents the way they treat us, we would have Fair Housing, HUD and every other agency down our throats. Just because they are contracted with HUD, doesn't mean they have to be so "protected" and untouchable that they can get away with anything. I've recently received large citations b/c the inspector didn't receive all my documents. I appealed to their CEO and he, of course, sided with his employee. Nowhere else to appeal to. This year, I proved the inspector was at fault and had documentation to show my proof; within one month, I called to speak with the inspector and they were gone "voluntarily." If they would just work with us, this garbage wouldn't continue every year. The inspector each year assures us that our property is great, when we get our results, it has numerous citations. One inspector confided that they have to find something or their supervisor will do it and they will get reprimanded. Someone please help get this contract administrator dumped or changed. ... – not a person identified.
Dropping out of HUD/Sec 8! Rents are low for all the reporting required-should get \$100/month above market. Tenants are bad. Audit requirements too expensive for 23 units. Inspections ridiculous--failed because of a sheetrock crack near a window--hairline. Hassle to get paid. We have to prove their status- you should!
... Housing needs to be changed. They do not seem to understand that their job is to provide housing for the low and moderate income tenants. They seem to have a policy of let's do everything in our power to keep units vacant and not make any work for themself.
Getting approval for plans such as AFHMP from the field office is next to impossible. Field office [illegible] is arbitrary and in addition to what is spelled out by HUD Regs.!
I have worked with HUD for the past 23 years. In recent years I have seen it deteriorate to a nearly dysfunctional agency. Regional HUD is not adequately staffed or trained and is seemingly being phased out in favor of centralized decision making out of Washington. Program funding levels are not determined in a timely manner, making effective program planning and administration impossible. Years of adding layer upon layer of regulation have made good programs cumbersome and less efficient than they could be. While adequate funding levels are important, HUD must focus on simplifying its current programs in order to contain costs.
1. HUD needs an ombudsman for small project owners to contact when we have questions or suggestions we do not know who to contact. If I want to make a recommendation thru my local office contact, it gets lost. 2. Seems field and local personnel have ideas of how the system could work better, but seems no one at HQ cares. 3. REAC inspections, while much better today than 3 yrs. ago, still have some questionable items that are punitive. 4. A system of posting info to the public of available housing thru newspapers, etc. could be more cost effective than having it done by each project individually. 5. There seems to be a priority given to non profits over for profit operators. This has always baffled me. Our gov't does not operate on tax collections from non profits – there are not any. There should be more help for small operators or owners. They care more. They tend to operate with more efficiency – less cost per unit annually. They do not have large staffs. But they are handicapped by HUD regs and interpretation of regs.
Way too much paperwork and reporting- not enough time to manage the property- it is almost a joke. REAC is a total nightmare.

<p>We are located in small towns, and usually know the person/s applying for units. Some of the rules and regulations do not really pertain to small towns. We feel everything is centered on the large cities. It was not an easy process getting an m-ID. The process needs to be posted with a step by step process. Now it is frustrating with EIV.</p>
<p>Contract Administrator (...) and local HUD office seem to interface very well, which is a positive for local properties!</p>
<p>I was very satisfied with HUD until three or four years ago, when we got a new director in the ... field office. ... never returned phone calls, help paperwork, lost reports, we had to send them three or four times. Our budget, ... has had for 9 months, waiting for approval. ... also caused discord between the members and the board. We are very dissatisfied with that person.</p>
<p>Would like to see HUD come up with a more viable option to keep expiring 236 contracts as subsidized housing. The current decoupling option is not effective for older 236 contracts. Would like to see more consistency from MBI consultants (reviews annual audited financial statements) concerning surplus cash calculations and the requirements outlined at closing on Section 8 contracts.</p>
<p>Everyone at the HUD offices and Contract Administration offices are so professional and try to help. The HELP line was very hard to get in contact with and there are a lot of times you would not get a call back or where very hard to follow. I would like to see a help line that you could email questions and get the answers back in writing. It is much easier to go back and read an email than to take notes and try and understand at a later date what you were asking. This past year seems like the amount of changes were overwhelming with everything else the property managers are trying to accomplish.</p>
<p>We have very little contact with HUD. Our interactions are mostly with the contract administrator. They (Assisted Housing) don't return phone calls, and the staff member assigned to the property seems to change frequently. Multifamily Help Desk is slow to respond. EIV technical problems are frequent.</p>
<p>... in southern ... is horrible.</p>
<p>As a fairly new HUD participant, it is discouraging to deal with the complexity of all the red tape. The rules are so complex it takes unreasonable time to interpret and deal with them. While HUD has implemented a new program that will encourage tenant reporting changes more timely, they need to hold individuals receiving housing assistance more accountable. The owners/property managers are held to the strictest reviews. Yet when we make decisions that are in the best interest of HUD, we sometimes are told no because the "tenant" probably didn't understand. It seems the tenant is always right. It is also discouraging because although we attempt to do everything right by the tenants, the property owners are treated as though they are the "enemy" by HUD. My company took on a neglected property and focused on renovations of the apartments to provide adequate housing for the existing tenants. This was not good enough and the emphasis kept being put on the curb appeal of the property. Unfortunately, we are in a drought and there is not adequate funding to improve the curb appeal at this time. I was given poor reviews because we couldn't do enough fast enough in one year, yet the same coordinators allowed the former owner to let the property deteriorate over many years. ... and always took pride in renovating properties and bringing the rental base back up. It was a "WIN-WIN" for everyone. Unfortunately, HUD does not want the property owners to have a "WIN-WIN" situation - especially if it is a "for profit" owner. At this point, I'm not even worried about a profit; I'm worried about "going under" because of the unreasonable requirements with HUD.</p>
<p>I attend all MOR's and the personnel that are conducting these MOR's are of course different folks, same contract administrator. Within 2 weeks of MOR's - the first MOR - I was doing the EIV all wrong - the second MOR - I was doing the EIV all correctly. I try to ensure that each and every HUD property we manage we are doing things/procedures consistently; however, I do not feel that the contract administrator is being consistent at all.</p>

HUD receives one complaint and a massive investigation is performed even though it is totally ridiculous in nature. Audits are extremely time consuming. HUD should exercise control of residents, currently the resident appear to run the buildings. Contract administrators should be held responsible for giving answers as to procedures. The biggest problem with HUD is the inability to give concise answers rather than to quote regulations which are grey line or unclear.

The ... is great! The ... HUB office is more concerned with enforcing outdated regulations than serving our low-income residents. HUD should never activate a system that does not work properly – EIV. Rules and regulations should clarify and make day to day implementation of HUD programs easier not MORE DIFFICULT. Local HUD Project Managers are over-burdened with too many projects.

Interpreting policies, rules, and procedures, I cannot get a consistent interpretation/response from different HUD program officers. My project manager, on several occasions, has asked me to seek answers to my inquiries and to inform the project manager of the responses and where I got them. I have been referred to HUD help assistance centers [that are] totally irrelevant to my questions/concerns by a project officer. I've spent thousands of dollars for financial audits because a HUD employee inputted the wrong information into REMS several years ago.

There are frequently conflicts in the interpretation of regulations for properties with multiple regulatory agents, i.e., HUD and ... or different HUD offices. This creates a constant need to revise documents between agency visits to suit each agency, i.e., Resident Handbooks, Tenant Selection Plans, etc. ...HFA interprets and directs us to use language in a document as per their interpretation of the regulations, and then when HUD comes to do their review at the site a few months later, they find issues with it and have us revise yet again based upon their interpretation of the regulations. This leads to unfair findings and a lower property rating. Asset Managers within the same agency often interpret the HUD regulations differently, resulting in our being given conflicting directives dependent upon which Asset Manager is completing the management review. This results in unfair "findings," a lower rating, and a general overall confusion as to what is "right." Some HUD offices have policies that they adhere to that are not related to regulations of the handbook. They feel they can demand following these local requirements at the threat of being in non-compliance or even default. We feel the information given in the 4350 is oftentimes purposely "gray" in order that HUD field agents do not have to commit to a definite answer, thereby alleviating the chance of being challenged in the courts. While we realize the importance of conducting physical inspections to weed out truly troubled and poorly run properties, the majority of the REAC inspectors we have dealt with in the past have come in "overzealous." They take insignificant physical findings and make them into major findings which has a huge impact on how a property scores. This results in truly well-maintained housing communities scoring ridiculously low at these inspections and does not accurately reflect the true condition of the property. Many in our industry have often wondered if the inspectors perhaps receive a special "fee" for each "finding." If so, this would surely create a conflict of interest as the more they find wrong, the more they make on an inspection. If this is the case, we believe this practice should be discontinued.

The ... field office has always been there for me! This is the 4th housing authority that I have taken over that has been in trouble and they are more than willing to give me necessary tools that I need in order to turn the agency around. Kudos to the ... field office.

Our ... HUD office is fantastic. Very pleased with HUD.

During REAC, Items that you can show are in repair should not be deducted, rather pass with comment. During the MOR, If HUD's final rule, is not the final rule, it leaves the property manager at a disadvantage. The webcasts are too long; It's hard to stay focused!

We need more time to implement new forms, policies, etc.; changes are constant and EIV has been difficult to view online; back to getting copies from social security offices. Overall 202/8 is an excellent program and the ... office is A-1. I hear the woes of peers across the country and feel relieved that our office is better. ... (PCBA) is doing a great job, very good at MOR and helps with issues that arise with interpretation of HUD

regulations.
Our main concerns are that it is extremely difficult to reach someone for assistance and the processing time for certain requests takes too long.
I am quite concerned with the EIV Requirements placed upon properties; considering the issues that are ongoing. Managers/agents are required to get access and run reports on a timely basis; however there are several technical issues that restrict us from gaining access OR pulling the Mandated Reports. I am a supporter of the principal of the EIV system but feel that the time requirements are excessive with the current "downtime." Procrastination has not been a factor as I have been registered as a user/coordinator since 12/2007. I fear the ramifications of mandated access to an unavailable system. We either need one-on-one help to complete access or an extended Final implementation Date.
HUD requires too much paperwork for everything. Tenant files are filled with the same information which needs to be updated 15 months, every year, 60 day, 90 day, 120 day. Why can't we update and discard outdated forms and information every year? Save some trees by allowing most of these files to be stored electronically!
It is a pleasure working with the local HUD office. The people from top to bottom are very helpful.
I am not happy at all with current project manager. Very arrogant. Does not answer questions in a timely manner, phone calls or e-mails. I have reported her to her supervisor on two occasions
My only real issues are the pushing of the 1. ARRA Grants then the guidance came in many cases, after the fact along with new reporting and regulation again after the \$ had been disbursed. 2. EIV is another item pushed and there have been many glitches and system failures. 3. Forms should be designed to be signed by all household members on one form not require a separate repetitive duplication. HUD says their goal is to reduce our administrative burden – here is a chance to prove it.
I feel supported by the HUD PM's I deal with. The issue is the disconnect between HUD and the contract administrators. We also have experienced inconsistencies within the HUD MOR process from the contract administrators (same CA, different auditors). What is okay for one isn't for another. We are nationwide and need to be consistent in our practices, so we can't accommodate everyone's wishes. We follow the HUD rules but have to argue w/ backup for all responses.
Generally very satisfied with HUD overall. Very minor problems, sometimes paperwork seems too extensive, sometimes for project of my size, under 100.
Work with HUD offices well – have some concerns with the contract administrator hiring individuals who do not understand the programs and are not able to do a good job with the MOR visits (in ... )
EIV is worthless! Nothing but busywork. The paperwork reduction act uses more paper than ever. 30 years is enough for me, I'm opting out when my contract is up.
REAC inspections do not follow their original intent and purpose and is just trying to find "gotchas"
Instead of HUD working as a partner their attitude is that of an adversary – hard to work with that type of attitude -
I have had a call into HUD in DC sometimes for over 5 days before a call back. Right now I am still trying to talk to the Help Desk and this is day 4 (working days). They are very slow.
They always are helpful (rhetoric on telephone) but new follow through – months or constant calling to accomplish anything and by then - "oh by the way the deadline is up!"
I only talk to ... (STATE AGENCY) not HUD.
HUD has gotten better in providing information w/ clarity over the past year. Very impressed!!!

Real inspector should give a 30 day notice prior to the inspection date. More consistency between state HUD offices. More consistency between state PBCA's. Each office seems to have their own opinion of how things should be done.
It is pleasing and important to feel that HUD shares the mission to serve low income households and communities. The present HUD leadership clearly does!
Non-responsiveness from Washington, D.C. Headquarters
HUD is basically a 50-office franchise that interprets rules and regs differently. Of the HUBs, ... is the most consistent and logical. Some PBCA's like ..., think they are independent and have the authority to go against the HUB and local office, which makes dealing with them difficult.
Main issues with HUD come from rule changes that are not conveyed in an appropriate amount of time to implement. And HUD online system is very difficult to use and navigate especially when trying to get business partners set up as owners are not getting letters that will allow access to EIV as required.
Need to be more flexible with 236 income limits. Need more support of economic development to enable families to meet their financial obligations with the rents and get out of the dependence model. Need more creative/flexible ways of mixing income levels and stop the concentration of social problems associated w/ low incomes in one [illegible] - A better way the ... model 50% Market 25 middle 25 low in others (depending on [illegible]) 50% low 25 middle 25 market or 1/3 1/3 + 1/3. What happens with neighborhoods and culture?
... leadership @ HUD ... is competent, easy to work with, and hardworking, that being ... .
The HUD ... Field Office has ruined my company this year and for their false lies; my small company may go out of business. I am currently waiting for a meeting with HUD Headquarters in Washington, D.C., regarding their misconduct. I have made countless telephone calls to the Headquarters for HUD and still waiting. ... . Thank you, ...
... and ... are terrible. They don't have a clue as to how to efficiently monitor financial performance. They made the process intolerable when it does not need to be. ...'s demands concerning R/R draws could risk financial viability of some projects in the long run.
For the most part the HUD staff are helpful and responsive to our needs and requests. There tend to be some discrepancies between what HUD and the Contract Administrator will allow to close findings in in Management & Occupancy review. HUD tends to allow for common sense decisions, while the Contract Administrator tends to focus on very petty issues and corrections to be made that are stressful for the elderly residents, especially when it comes to the date of the social security award letters when the info hasn't changed, but social security didn't put a date on the letter but did state when the amount being paid would take effect. Also, there have been inconsistencies with what each contract specialist requires or their interpretation of the HUD regulation.
PCBAs do a poor job of working with owners and management agents in monitoring HUD programs.
State of ... Contract Administration needs to educate their staff about the LIPHRA program and the 'Plan of Action' that resulted from the program. TRACS needs to update their software for the LIPHRA Plan of Action so that they do not create false errors regarding the calculation of rent – our rent is capped at 372.00 for a 3 bedroom and 352.00 for a 2 bedroom for our subsidized units. HUD or ... needs to communicate better regarding policy changes – suggestion – mass email HUD properties whenever a policy changes and what the change is. HUD changes are happening so frequently now that it is difficult to keep up with the changes so that we can remain compliant.
We are being suffocated with a blizzard of paperwork and regulations. I have had HAP contracts with HUD for over 30 years. I support and agree with the need for each new regulation (proper income determination, student rule, citizenship rules, EIV, REAC inspections, and etc., etc.) I understand the need for reviewers to "call out" missing or wrong dates and every undotted i or uncrossed t because their work is reviewed by their

supervisors. However, taken as a whole, the documentation and implementation becomes confusing and paralyzing. When HUD implements a new regulation, it has no regard at all for all the existing regulations we have to contend with. EIV is a good example. Replying to a statement that EIV would be an administrative burden during the comment period, HUD responded in the Federal Register that it was very simple, just go to the website and click here and click there. That is true. However, what the folks in their ivory tower in Washington didn't consider in their answer was the complex and cumbersome regulations and requirements to implement the program. (A copy of some of the requirements is enclosed: (1) Outline of Enterprise Income Verification (EIV) requirements for Management and Occupancy Reviews, (2) Documents to be Made Available by Owner/Agent OMB Approval No. 2502-0178, and (3) EIV Monitoring Checklist.) You will note USDA officials are prohibited from seeing EIV verifications which requires us to obtain a second set of verifications for 515/8 projects. Another joke is the "Reduction of Paperwork Act." Since the "Act," we have had to double the number of filing cabinets to hold all the paperwork and now we need more. We have dozens and dozens of forms we need to document regulations and procedures. Most of the forms we had to devise ourselves. As OMB approves a form, we are subject to findings if we use our form instead of the OMB approved form when our form has the same wording. Most of the time we don't know when OMB has approved a new form. OMB has recently approved a lease we must now have our tenants execute. That form expires in 2011 and our tenants will have to execute a new lease then, I have been told. OMB is creating more, not less paperwork. In summary, the paperwork and regulations are becoming so great, it is interfering with the day-to-day operation of the projects and the mental health of the owner.

Most information I receive is out of the ... station. ... also provides much information as well. Both are very helpful. On several occasions waiting for an answer has taken many weeks before questions are answered. REAC is also knowledgeable; however, again waiting for an answer can take up to several weeks. Over the last year responses are being returned in a more timely fashion. I would like to point out that both HUD office in ... and ... are very knowledgeable and helpful. I guess the bottom line is time not knowledge.

We were given information from the ... Field Office that proved to be wrong and caused our agency to make decisions that were costly based on that information. We are still attempting – one year later – to work our way out and the attitude from HUD was “oh, well.” Agents in the field offices aren't always very knowledgeable when asked questions. We have been given two different answers when asking the same questions of two different departments.

HUD is over the top. Its requirements are onerous and its programs are inefficient. It should be more focused on market proven initiatives. Much of its operations, policies, etc seem to have racial undertones that are not appropriate. Above the surface and below the surface. In short, it is being used more and more as a political and social engineering tool. I hope I do not get a target on my back for saying these things.

HUD central does a good job of articulating missions and goals, but that articulation does not get well translated or clearly understood at the local level. Local offices are more wedded to bureaucratic responses than in actually interpreting HUD regulations in light of HUD mission and goals. Often, we are treated more like an adversary than an agent following HUD's goals and developing affordable housing. REAC system. Good when it works. Often it is more cumbersome than necessary: When a flag is put on a property, and owner complies with outstanding item, it can take up to 12 months to get flag cleared, well after property/owner in compliance, affecting company's ability to do HUD deals. 2530 Process. Changing administrators can take up to two weeks (much longer than CCR & Fed Reporting government which takes a couple of days for processes with similar levels of confidentiality. Regulations interpretation varies greatly from one local office to another.

Do not get clear guidance with interpreting the HUD manuals. Often are told to go to certain section of HUD manual with no help interpreting it.

Thanks for asking for this input. Much of our housing work involves USDA and the differences couldn't be more stark. HUD and its processes are so far ahead and better to use than USDA.

<p>1. HUD staff are not user friendly on phone calls. Can be rude. 2. Working with HUD is difficult. Nothing is timely. We are told one thing only to find out it isn't happening. We count on funding to support our clients and staff. The process is burdensome. 3. Too many programs are put out at once. It is confusing. Each program is a little different and the alphabet soup is hard to follow. 4. Rules and requirements are endless and complicated. Too many people unable to be clear. 5. Too many webcasts; too much wanted time. Every entity we work with has numerous webcasts and they all begin to sound the same. 6. The general impression is that HUD doesn't trust the people it serves.</p>
<p>Would like to see more alerts/notices on mandated changes to Section 8 multifamily tenant files. Would like to see alerts/notices about changes to rules, policy. Example: 504 compliance changes, EIV changes to rules and guidelines including documents changes and or additions to documents. More alerts/notices on Section 8 compliance training sponsored but HUD. The seating for existing classes are very limited and only offered 1 time the next class is in several months later and across state and then very limited seats also. Easy access buttons added to HUD and THSA websites for access to mandated documents and training locations and dates.</p>
<p>Our dealings with HUD and third party contractor are very time consuming. Much time is spent not just attempting to comply but to understand how to comply -- particularly in regards to paperwork. It is hard to get a clear and concise response without reading through volumes of information. Though we send property manager to training sessions it is hard to stay on top of all that is required. We own one small property with limited resources. The system seems to be set-up on assumption there is unlimited resources and a staff that is solely devoted to complying with paperwork and not day to day needs of tenants and property upkeep.</p>
<p>The HUD personnel we work with do a great job. The reporting requirements for Section 8 tenant certification is becoming burdensome and labor intensive without any additional benefit to the program, tenant or owner. REAC inspections are inconsistent and unreasonable in their scope of inspecting. Local CA's and HUD personnel know the projects, the owners, the management and agents and they are aware of how well a property is operated and managed, or is not. Someone trying to outbid completion and perform these inspections have no ownership in the service they are suppose to provide, a huge waste of money.</p>
<p>Very disappointed w HUD (esp. CA's). Late notices forcing us to backdate information (signatures), extremely unprofessional. EIV was working great, then fell on its face; EIV vs. SS Office information does not agree and so we, the housing providers, will be penalized. HUD and its contractors are failing to use common sense in the application and regulation of low-income housing.</p>
<p>HUD needs to think twice about some of the redundant papers the tenants have to sign. Example: (having a tenant sign a pet lease when they don't have a pet.) When HUD has a rule and the property manager used that rule, HUD needs to back the manager when the tenant/applicant tries to question it. HUD requires us to develop a Tenant Selection Plan, if what is in it can be questioned at every turn. Why have it?</p>
<p>1. Too much paperwork duplication – lack of common sense. 2. Inappropriate requirements – example: No Indian (American) tribes in our area – perhaps a few individuals – so why was a written plan required of how to make this minority aware of a 16-unit property? 3. Refusal to use good judgment by HUD employees – example: An applicant noted she had applied for a job. When her paperwork was being processed, HUD required a response from the employer. We explained she did not get the job, the “employer” would not respond, and that went on for months. Anyone's brain working at HUD? Total waste of taxpayer and client dollars. 4. The low-life tenants know how to work the system so why should folks stay in the program. This client didn't.</p>
<p>Because we are both an owner and manager and because we deal with so many HUD offices we see a lot of extremes. Some HUD offices are very responsive and helpful and are a pleasure to work with. Others are very unresponsive, slow and difficult to deal with. Also some offices have a bizarre interpretation of rules. We see a lot of variations regarding how different things are handled so we have to learn how each office does</p>

<p>things. That said we understand the large amount of work/responsibility given to HUD and appreciate the efforts made. Overall, the most important thing is the quality of people hired. In general, regardless of different interpretations, if a capable person is who we are dealing with, our experience is always better.</p>
<p>I have been managing multifamily and senior citizen housing for 35 plus years. HUD has improved tremendously since when I first began. The housing has also improved. Thanks!!</p>
<p>Need to respond to E-mails. Need to return phone calls. Need to understand the Guidelines they mandate.</p>
<p>The HUD REAC inspection process is broken. There are no consistent methods being applied because different inspectors are being awards work to inspect and each inspector has different levels of experience he/she brings to the inspections. This causes varied results. We have witnessed properties score in the 80's and drop to a 10 or 15 within one year's time. These inspections cause delays in redeveloping a property, selling assets or refinancing. One suggested fix would be to assign one inspection company to a project so at least one company's experience is applied consistently.</p>
<p>Clarifications about some of the EIV requirements. Resolving discrepancies is hard to match with 50059 when there has been several IR during 1 yr period and nothing matches EIV reported quarters. Would like for classes offered of EIV that we could attend to better understand how to identify the period of income by EIV to now records.</p>
<p>HUD offers a wonderful program for the elderly. Housing is great and provides a safe environment, companionship and support to those who live alone and those who don't have a lot of family support. It also frees up homes for the younger families. Working through Government bureaucracy can be very challenging!</p>
<p>Our agency works with ... to make home loans to low income families. Response from them has been very confusing. At this time our loan office quit because of "no "response on trying to make loans in our county. These economic times have no one in this office knowing what the left or right hand is doing. Loans should be simplified. This office is sitting on millions of dollars and is not assessing anyone except now they have a new office. Chain of command is confusing, Is there money just sitting there waiting for what? This office is a part of HUD but someone controls the strings. HUD does an excellent job but this office needs reorganization NOW.</p>
<p>Our concern generally relate to the inconsistencies and inaccuracies under the REAC and Performed Based Contract Administrators systems of evaluating properties. While protocol and procedures are clearly defined in both processes; the implementation at the site level is inconsistent. There are also appeals to a division between the CA's who perform MOR's and the local HUD field office. I also think HUD field staff should be educated on the various aspects of a REAC inspection. I get the sense that they are unfamiliar with the protocol at the site level. However, we do enjoy a good relationship with our local HUD office and have generally found them helpful.</p>
<p>When the HUD Field Office handled the servicing and compliance for our Multi-Family New Construction HAP contracts it was GREAT! Now, HUD has used outside contractors to administer the compliance reviews and the contract renewals. It has been a nightmare working with Contract Management Services out of ... Housing Authority. I really think HUD needs to take back the servicing of the program. I truly believe it will cost less and be more customer friendly. Thanks for handling my concern.</p>
<p>... Hub is worthless. Thank god most of my contacts are with a contractor.</p>
<p>We are a small PHA. I am very disappointed in the time requirements for my small staff to spend reporting to HUD. Our ARRA Funds for example of \$150,000 took way too much time with all the added reporting we had to do. Various HUD staff interpret regulations differently which is very confusing when we are trying to get clarification.</p>

HUD needs to be more informed and consistent in its evaluations and opinions. It also needs to simplify its paperwork as many forms used are repeating forms that serve no purpose.
The amount of auditing required by HUD on an annual basis has become excessive. At present, properties are subject to no less than 3 audits per year of the property, files, accounting and management performance. The cost of these audits in dollars and time has grown to an almost unsustainable level.
I have found the ... HUD Office staff to be very responsive, helpful and knowledgeable of regulations, program requirements and project needs.
The ... office is a very competent one, but we are losing a lot of senior people and I have not seen many replacement personnel hired. My sense is that everyone in the office is working to maximum potential.
HUD staff usually do their best but they have a very high volume of work. ... staff are very helpful. REAC is NUTS-we agree that the properties need to be held to very high standards, but the process seems to be purely punitive. And heaven help the property that gets a very high score!
Much more effort is needed to monitor consistency in the application of regulations by 3rd party contractors in the REAC inspections. Some are fair and reasonable while others can inspect the same building with ridiculous findings and completely different scores all within a 2 year span. We once spent \$7 million renovating a building that had received a REAC score in the high 80's before renovation with one inspector while the inspector who came after the renovation scored the property in the 60's. Something is very wrong with the process.
REAC inspections are not uniformed. 3rd party contracted inspectors obviously do not understand how to grade a subsidized apartment complex.
HUD ... pulled our funding as of .../2009. This put almost 50 families on the street. Tenants were given vouchers for new housing even though they still had outstanding balances! There are still thousands of dollars in unpaid rent due to our property! ... was completely inappropriate in the decisions made leading to the cancellation of our contract. I've been trying to reach ..., who was sent by HUD ... . Have not spoken w/ her since ...2009 and she does NOT answer her calls!
There is a total disconnect between Multi Family REAC inspection and Fair Housing and Equal Opportunity. Multi Family should provide overall coordination. Multi Family knows and understands all aspects of local property operations. They have the greatest accountability.
I consider it unfair that I am charged an equal amount for the annual audits as someone with significantly more units than myself. 2006 I requested funding for ... additional units to bring my total to 32. The folks in ... responded saying they did not have the funds. We have not seen any vouchers in this area.
With all the contractors used by HUD. What does or what is the function of HUD?
I have a management company working for me that deals with most HUD issues.
Too much paper-work! Some of it repetitious and not really necessary. Too time-consuming! And the EIV requirement is not helpful at all - - we get the same information from W-2's, 1099's, Social Security letters, etc. What's more, the time frames covered for wages usually don't coincide with the period we are certifying; besides, the system has been down for the past 2 months and has been no help at all.
I have been a property owner of HUD properties with Sec. 8 HAP contracts for over 30 years. I purchased one of the last properties that the Federal Gov't actually owned (built under WPA in the 1930's). My dealings with HUD were satisfactory until the last 10 years or so. Now the personnel are incompetent, rude and only interested in being a big brother bully. The outside contractors for physical inspections have only one goal, find any inconsequential deficiency they can. I can work within this system by just understanding motives, but why? It has gotten totally out of control. Why not go back to the Gov't actually owning projects (as they did my 1st project), run them properly and cut out all the middle level bureaucracy. It would be much more efficient and less costly in the long run. HUD needs to be totally dismantled and a new system put in place. I

<p>have no personal axe to grind – I have had much success through the years, but recently personnel have become oblivious to their mission. (I am exiting my last project this year, but hope affordable housing can be sustained without the overbearing rules of current HUD personnel and procedures) Most of the problems are due to supervision of HUD insured properties – there is a definite conflict of interest by insuring loans and then providing the main revenues to operate them.</p>
<p>Two or three years ago ...failed a REAC score by 1 point. This was caused by a faulty inspection of this roof vents and a huge number of points were deducted from ...'s score by mistake. Upon receiving the REAC report I hired an engineer to recheck the vents and all were found to be working (no exceptions). Upon learning this information I immediately informed REAC and the ... HUD office and insisted that the REAC report be corrected. The REAC inspector wrote a letter of apology; however ... of the HUD office refused to correct the score and was nasty and unhelpful in handling the situation. When ... refused to help I appealed to Washington and received relief. The ... office should have been helpful and taken more responsibility in this matter.</p>
<p>Always updating forms and you never know when the forms have been updated.</p>
<p>... HUB is GREAT! TN office is fantastic! ... is TERRIBLE! ... is good! It depends on the HUB – I answered this questionnaire based on the ... HUB for the most part!</p>
<p>Consistency with REAC scoring abs clarity with HUD rules would be a huge improvement.</p>
<p>Historical information seems difficult to access – timely response to policy questions is a concern</p>
<p>The ... HUD office has good leadership in .... The staff at HUD seem to be overwhelmed and their customer service has changed from fair to poor. The REAC inspection process has been a disgrace. The inspection is clearly looking for every means possible to downgrade a property. Within or outside of inspection protocol.</p>
<p>I have been very disappointed with HUD for the last several years. 1. Flex subsidy: They cannot or will not give us a payoff total. As we near mortgage payoff we need this information to forecast how we will negotiate through the next few years and to remain fiscally responsible. 2. Reserves: Since we have been fiscally responsible and have never had a late payment or defaulted on a loan, I don't see why we cannot determine for ourselves how reserves are used. 3. Excess income – again having to report to HUD how and where these monies go makes no sense. 4. HUD Handbook: Is open to interpretation. When it is used we always hope we interpret it the same as HUD employees, who do not always agree with each other.</p>
<p>Been here 30 yrs. ... office servicer is excellent. EIV insane. REAC took off 12 pts for a rut in the grass where tenant had pulled truck in to sneak out night before. ... nitpicks us to death and lately seems to be enforcing rules that are not in the manual and may be of their own making. Regs change so often – can't keep up. This is not a career for me – it's a calling. The paperwork and demands have increased geometrically over the last 30 years. I provide decent, affordable housing to the disadvantaged but the ideal is lost in the mountain of regs and paperwork. HUD contractors justify their jobs by finding flaws that barely exist. Even so – we always do well – but are more and more pushed to the wall and dancing as fast as we can to keep up. I'm 70, with a college degree, and after 30 years still only make \$25,000 annually. When I consider what this job puts me through, I feel like Mother Theresa.</p>
<p>HUD ... Multi-Family: way too much time off, either sick, family sick or on vacation. All given big titles but no authority. All Project Managers. Even things like releases from our replacement reserve for pre-approved projects must have sign off by their management and bank report internet data submitted with the request is ignored. It takes months and contractors are waiting for their money. As an example, I faxed and e-mailed a request for ... on May ..., 2010. I just called, June ..., 2010, and asked for the status of that request. She said she would look into the May</p>

... pile and she found it. I was then told it would be a few days, 2 or 3 to get a response. They never answer the phone; you can e-mail, fax and leave messages but no response. Actual manager way too busy; only way to get help is to call until he answers the phone. Polite, but either not trained or not competent. You cannot overnight anything to them directly. All mail and overnight services go to a clearing house and not given to the person for which it is directed for about a week. HUD TOOLS: Data way over-protected. Must change the password every 90 days; cannot use last 10 passwords; must have any access to data pre-approved; must remove tenant data after 36 months from departure. Anyone who sees the data must sign an acknowledgment. REAC data base has been used for years; now we have EIV. We even have a "dead tenant" report ...required months. Reports not user friendly. These reports are not of value to us; let HUD run them and report problems. It would seem like the reports are for catching 1 % or 2 % of the cheaters and force the other 98 % to go through all the hoops. AUDITS: just looking for something to report, like what action are you taking to prevent a twenty-five (.25) cent typing mistake. No benefit to tenant, nor any benefit to HUD. Why audit the same history as the year before? Why have annual audits? When audited, why audit files that are 15 to 20 years old and then give a "finding" on procedures that were used 15 or 20 years ago? If REAC audits determine the next physical inspection is in 3 years, why have NY City audit every year? HUD RULES & REGULATIONS: HUD rules and regulations are so foggy that an industry has grown up which clarifies and interprets HUD rules. I subscribed to three different services so I get forewarned and not have any new rule or regulation show up on an audit.

HUD is one of the most antiquated and inefficient institutions with which I've ever dealt. HUD is still in operation only because it is an arm of the government and is allowed to waste taxpayer dollars with its inefficiencies and confounding maze of hoops and obstacles to work through to get even the simplest tasks accomplished. Any other entity competing on the free market that is as slow as HUD at responding to clients and as terrible at providing a useful service as HUD would have perished long ago. The incompetence of some of the staff in HUD's offices is astounding, which is why it is not surprising that HUD routinely hires work out to Contract Administrators who are better qualified and equipped to work with property owners and managers. At least the Contract Administrators need to demonstrate efficacy and are expected to respond to Owners/Managers in a timely fashion and provide useful information in adhering to HUD's own guidelines. HUD has the benefit of not being accountable to any one client and cannot be fired for doing a terrible job because it is funded by the grace of tax dollars. I cannot count the number of times I've requested information from HUD staff and been referred to a handbook, another HUD helpdesk hotline or to the HUD website. Anyone who has ever tried to navigate the 4350 Handbook or the HUD site can attest that at best it is a jumble of mismatched information that is only marginally helpful as most all of it is subject to interpretation and at worst, really just a place for HUD to dump every document ever published having to do with public housing. If you then ask HUD staff for clarification, they are only too happy to refer you back to archaic handbooks and websites, what then is the point of having HUD staff? The government could save millions of taxpayer dollars by instead putting "Please refer to the handbook" on a recording or auto-generated email reply. Then there are the times when you request help but are outright ignored and are forced to revisit the same issues again and again over the span of months or years and having to re-explain the same predicament yet again. Furthermore many of the outdated forms of HUD documents are still available on their website, so really it is a test of luck to see if you find the correct one to use. Even Contract Administrators who are companies specializing in knowledge of HUD rules are so confused by HUD guidelines and rules that oftentimes they have to "research" and get back to us, using precedence and other properties dealing with similar issues to make any sort of determination. I recently even found out that Contract Administrators at certain levels are (??? sentence not finished) Keeping up with HUD's new rules and requirements is almost impossible unless you have a full-time employee dedicated to learning all the new rules and what needs to be implemented to be in compliance. It is laughable too that these compliance requirements vary from year to year depending on which Contract Administrator you have surveying your files and how strictly that particular inspector adheres to HUD guidelines (which as I mentioned earlier are subject to interpretation). In short, working with HUD is a test in endurance in the face of stupidity and insanity

and is not a pleasant experience for anyone who appreciates an efficient and reasonable work ethic.
The use of HUD contract inspectors is producing ridiculous results.
HUD needs to stop constantly adding rules and requirements. Tenant files for S/8 tenants are absurdly thick. This greatly increases administrative costs. Also, in general, our S8 tenants are far harder on units physically than are, in general, conventional apartment tenants. Yet management agents are limited drastically in how much of a security deposit we can charge. So that too adds costs not borne by the conventional market. Yet HUD lumbers on in the daydream that its rents should be the average of the rents in any and all of its markets. Absurd--but we have no resources. HUD also refuses to increase limited distribution in projects that need them. Now if an owner makes an advance to a project, he cannot recoup it except through the limited distribution, which is puny in scale to what any rational investor would demand. The local HUD personnel we deal with are not the problem--HUD central with its lumbering, unrestrained bureaucratic mind set.
REAC subcontractors are terrible. One property received a 99 and two years later received a 47. There had been no change in ownership, mgt, or staff in the 2 year period and in fact some capital improvement had been made. The REAC inspection program is unreliable and the scoring system is improperly structured. Using a strict interpretation of the inspection standards my home would not get a passing score. No one at HUD can understand all the rules and regs. I have tried several times to get direction from HUD in Washington but jobs seem to be vacant, or filled on a rotating basis and no one can provide answers. Perhaps HUD should be privatized. They waste a fortune on staff that isn't very helpful.
HUD should hire and track its own employees to carry out its duties. Contracting out entire functions is disruptive and often entails long discussions to deal with contractor lack of expertise.
My biggest complaint is that for those of us who have Multi-family properties, Public Housing, and the Section 8 Housing Choice Voucher Program, that the rules should be more uniform. The forms should also be more uniform for example the form for Victims of Domestic Violence – for Public Housing – the form is 50066 and for Multifamily it is 91066 – Almost exactly the same but slightly different. Why? From my understanding the 2 offices – Multifamily and Public and Indian Housing are in the same building – one floor apart but they act like they don't know the other exists. Wouldn't it make more sense to pool their resources so we in the field have a little more consistency?
Good survey.
By and large – the folks at HUD try to be helpful and cooperative. The contractors (CMS in particular) seem to go out of their way to be difficult and un-cooperative. I have found most all of the HUD trainings to be very helpful. The current trend for HUD and USDA to align their rules and regs together is wonderful! Please keep moving in that direction!
Contract administrator – ...has been a great partner – much improved since inception. The difficulty with HUD is in program understanding and difficulty in getting information needed.
EIV is a big pain – it is so difficult to register, stay updated and registered. Limited English Proficiency Requirements on apartment owners are onerous and a perversion of the constitution. Owners aren't provided enough assistance to meet LEP requirements.
We are a small one-complex property with only 8 units. Lack of finances prevents me from attending many of the training sessions that require traveling several hours and staying overnight. Training is critical in this ever-changing electronic age. I understand their choice of conducting sessions in the city where their offices are located but the center of the state would provide opportunity for more office personnel to receive the necessary training. I do appreciate the simplification and clarity the HUD handbooks and publications are now written in. I appreciate the friendliness and expertise of the HUD personnel I deal with. I wish decisions could be handled quicker.
We have very good response with our contract HUD Office ... but have had problems with help and information from HUD Help Desk and EIV WASS

and TRACS mail.
As of January, I became the Asst Property manager and have had moderate interaction with the ... field office. The overall response in returning calls was lacking; otherwise HUD has been very helpful in aiding in my transition to manage a HUD property.
It is just so stressful to be with HUD .Paperwork wise, if it is HUD's fault, then it is the owner's fault-HUD never admits it's their fault-but if it is the owner's fault you pay big time- the owner wants the ... to take over the property once their contact with HUD expires.
1. Efficiency of HUD on 0-100 = 5. Need incentive based pay. 2. HUD is absolutely "one-sided" - tenant only - "screw the owners" - 30 y. experience of same – few individuals with more experience. 3. Need to hold tenants responsible for tenant conduct – drugs, pets, nonpayment of rent/damages and expect "work" contribution between difference of FMR and tenant pd. rent – whether it be as lawn cutter, hallway cleaner, school crossing guard (babysitter for other workers), "student computer learner" or any form of make work. The free "attitude" truly does not help any tenant and forcing responsibility in exchange for reduced rent is no "worse" then expecting children to help around the house or do their schoolwork. Either tenants participate or they are out. For financial recapture – use IRS. 4. HUD personnel should be given goals and specific dates for performance and then judged/promoted/or severely demoted for performance specifics or lack thereof and demoted/fired for cover-ups or missed items in performance. 5. Forget about financial detailing and use IRS info, plus lifetime exclusion for lying and jail term for IRS fraud.
Do I receive witness protection? HUD is an absolute waste of money.
Third party contractors for REAC inspections and audit reviews are petty and unprofessional. R-random E-evaluations A- arbitrarily C-calculated.
Answers are negative because of our frustration with the online systems and lack of instructions. The EIV system is ridiculously cumbersome - the time spent has been unbelievable trying to learn and accomplish the requirements. We manage elderly housing nice complexes-one HUD. We have a very successful and time efficient system to verify income and assets. EIV has dramatically increased time needed in our HUD complex for an otherwise simple process. The contract administrator's interpretation of policy lacks reasonable and/or common sense in their perception-frequently. Our rural development review is every three years with superior ratings. HUD review is annually with pages of nonsense and time wasted responding.
HUD has no sense of time, they are more focused on regulations, and there is no sense of urgency. It is obvious that HUD personnel enjoy regulations. I wonder what would happen if they had to get a job done in a timely fashion or had to make a productive payroll. All see total bureaucrat.
7d. Local office is responsive, but is as reluctant as we are to contact Washington. 7i. We have learned to ask – always – the one local HUD employee who is responsive and knowledgeable. Online application for HUD programs is terrible – crashes, instructions don't instruct. Please start over.
On the regulatory side of HUD, it's unfortunate that owner's/property management have to be on the defensive at all times when dealing with HUD. HUD is not generally a resource that we can rely on to advocate or guide us with problem residents. For example, we have to spend \$ to hire attorneys to defend us when residents don't like the rules and make "vengeance" claims to HUD. Who do we get when we have residents who do not abide by the rules, break the rules abuse the subsidy program, etc? The answer...No one. We have many, many agencies and divisions of government watching how we conduct our business as follow the regulations. It takes one resident who doesn't want to follow the rules and gets angry when they are told they have to call HUD up-file a bogus claim and we have to hire an attorney to defend ourselves. It is not a balanced system. There are no consequences for filing an untrue claim against the owner.
HUD is no better or worse the any other federal agency I have dealt with except as with regard to information technology. HUD is awful. The worst

<p>website, inability to implement EIV in an efficient manner, poor record keeping, etc.</p>
<p>As recent events show, it is likely easier to get a deep water drilling permit from the Federal Government than to do just about anything with HUD. There is not a more bloated agency in the entire federal government. There are thousands of pages of regulations which have grown and grown over the years and the sheer volume of paper makes consistent regulation almost impossible. A good example of HUD's problems was the APPS system, which was terrible and cumbersome to the point that a law was passed in 2007 prohibiting them from requiring its use. To this day HUD has sent out guidance to HUD project managers on how 2530s are to be done, but nothing is published anywhere for the use of owners and managers. That is ridiculous and indicative of how HUD operates. OAHF's this party surplus cash reviewers are also terrible to work with. Each state contractor administrator makes it own rules and centers a lot of complications.</p>
<p>Working with HUD or CA is and getting worse every year. Find the regulations harder and harder – very inconsistent – Spent 25 years dealing with and so much nicer in the 70's. Dealt with one person who knew the property – The CA's have too much control and not very consistent in their interpretations of rules and regulations. Example: Tenant Selection Plan and House Rules have been revised every year because current specialist doesn't like something. Can't wait to get out of program! 2011</p>
<p>1. HUD takes the position on tenant-landlord issues that the property/owner is guilty until proven innocent. 2. Changes contract requirements unilaterally. 3. Issues new forms before the errors are corrected initially.</p>
<p>Reason for low opinion in item 11b (REAC) is that the REAC inspectors ... to the inspection and spent a lot of time criticizing the government and was not very professional.</p>
<p>We have a management company representing our facility. ...</p>
<p>I do not interact with any HUD office at above locations. I deal with the ... office. Following are examples for dissatisfaction: Difficult to use HUDclips on website. It's volume. Our board desired to hire a management agent listed on a HUD provided list of agencies. But HUD would not certify the agent for a lack of 236 experiences. However, they certified an agency which had flags. Regulations and handbooks refer mostly to what owners are liable, they do not refer to any authority of owners, limiting owners' ability to make decisions and take responsibility. A few members from church used HUD backed loan in 1970 to purchase a 24-unit apartment. Members now deceased. As president of seven member board, we never could gather all handbooks pertinent to owners. HUD is helpless.</p>
<p>I am very satisfied with HUD, its programs, its personnel, etc. I am extremely disappointed with REAC, ... .</p>
<p>We have not owned a property – with HUD Section 8 supervision in over 2 years.</p>
<p>It will be good to have systems that work uninterrupted (computer) we need to have better segregation of access to the HUD PHA online systems.</p>
<p>I don't deal with HUD at all my business runs through ... does a good job but HUD sends to much paperwork and the Web site sucks, it's too confusing.</p>
<p>HUD fails to provide HUD personnel to be a part and in touch with the REAC inspection process. Managers and owners are frustrated with the subjective nature of the inspection process and criteria. This process needs to be changed to include physical inspections with HUD staff. The contractors used for these services are not qualified and the entire process is expensive in time and a frustration that is unnecessary.</p>
<p>As long as the idiots in Congress change the rules and jerk the HUD regs around every 90 days – the agency will continue to be what it is. A very cruel joke. HUD is just like the government it is a part of. You can't talk to it – You can't understand it – you sure as hell can't change it – And, if you point out that it doesn't work – they come after you. It's got more in common with the IRS than it should to be welcomed anymore by the users. How about that EIV launch? I wondered where the Y2K staff ended up. They are still in computers working at HUD! Anybody who can get</p>

away from HUD, does it as soon, as often, and as far as it possibly can. Outside DC, this is a fact.
I work with the ... Field Office and those folks due an excellent job providing support and advice in a timely manner. I am very dissatisfied with the gov't. reporting requirements.
I seem to get mixed information. One person tells you one thing and another person tells you something else. It is difficult to reach people on the phone always voicemail.
Work exclusively with the ... office – Multifamily Management [illegible] - Simple requests take inordinate amounts of time for a final action. We have [illegible] for replacement requests that take up to 6 weeks. Another perfect example of micro management is the fact they have placed an 811 project we fee manage on the Troubled Housing list – This is because we need to request the release of regional receipts on a quarterly basis to operate as HUD will not allow a rent increase as long as regional receipts exist. At 4130110 the regional receipts account balance was \$... . This would not give anything [illegible] entity the impression of being troubled. My opinion is that they make up rules and overstep their authority to the detriment of their clients – both owners and tenants! Their incessant massaging of requests of any type and the time it takes to respond to them is ridiculous. And staff needs to remember that their main focus should be to ensure the present and future success of their portfolio of insured/subsidized properties. Not only from a financial standpoint, but also in delivery of services to tenants and administration of rules. Staff should view themselves as a partner in the process, not an obstructionist.
The contract management service HUD uses here has a performance based contract. This is a HUGE problem. ... does their on-site MOR work and the exit interview and goes over the findings with you – Then you get their report and it has probably ten times the number of findings on the written report. MOST findings in the written report are untrue and/or fabricated. Please fix this problem.
As an investment, I would not be involved on any future HUD apartment transaction given the confusing and contradictory nature of the regulations. We have been attempting to sell our 8 unit HUD project for two years and have been unsuccessful despite the fact we are selling at substantially less than what we paid 6 years ago. Apparently, the less money invested in a HUD purchase the greater the return. Totally different from 10 - 15 apartment complex sales I have been involved in over the past 20 years.
HUD's union mentality needs to stop. They take off more time than they work. Access to HUD personnel is difficult. They can be ambiguous and indecisive with major issues that affect your property. We have a lot of money on the line and need clear guidance from HUD. In all, I do like doing business with HUD but it shouldn't be a huge balancing act. Thank you for doing this.
The use of HUD contract inspectors is producing ridiculous results.
I am very much dissatisfied with the method used for reviewing rent compatibility studies." Regardless of the RCS appraiser's findings pertaining to market rent, the HUD contract appraiser makes his own determination of market rent; and, if that determination, based on his desk appraisal, is lower than the RCS appraisal, he denies the RCS.
1. It is just about impossible to get support from REAC, TRACS, and EIV. They are not available and usually don't return calls, We end up giving up. 2. REAC inspectors and inspections are arbitrary and punitive.
With so many changes in regulations, it would be wonderful if more conferences would be established in ... . Thank you
I feel the PBCA think they have too much control and ride the management companies to justify their existence. I do not feel they should be performance based contractors and receive incentives to dig for errors. I also feel management companies should be reviewed yearly to make sure they are in compliance but believe we should all be working together to provide affordable low income housing for citizens. Having scores such as Superior but telling management companies that they are hardly ever given out, and in rare cases Above average are given is very

discouraging for dedicated and responsible management companies. As indicated above I have worked in the business for over 16 years and by PBCA coming in a grilling staff it discourages people from staying which in turn places new staff in position that they are not train in regulations therefore justifying their existence. Thank you!
HUD should put more effort into managing tenants rather than always requiring property managers to fulfill requirements/mandates (or else). Example EIV. REAC should create new RE assessment/evaluation form that is effective. Current guidelines are not effective. Example: I could have a marble floor with one hairline crack in a tile, yet it would score worse than a floor with VCT (vinyl composite tile) with no cracks yet 20 different colors.
HUD is doing a great job. Thanks for all they do!!
Regulatory overload, bureaucracy.
... HAP does a great job. They are whom we have had the most contact with these days. HUD is almost in the shadow by comparison. We have very little contact now with HUD. The constant, never ending changes we have to make to comply with HUD regulations is BEYOND RIDICOLOUS!
HUD and its contractor ... design their regulations around LARGE property portfolios. I have only one site manager to process the paperwork for 64 Section 8 units. The mass of paperwork required is OVERWHELMING!!! And the micromanagement of bureaucrats who seem to know all of the regulations but none of the day to day requirements of running a business. I can't even afford to hire help because the rent structure imposed doesn't even allow a financial break even. In fact, I regularly have to input my own funds to keep the doors open at full occupancy. If there was a way to get out of this program I'd be gone before you could blink!
Enough with the over regulations? In the last ten years HUD has grown increasingly regulatory. In the past HUD and I were partners in providing affordable housing to those individuals least able to afford it. Now-a-days HUD is more like a dictator telling me how to run my properties and what I have to do to please them. Cases in point: 1. In the past MORs were done with the intent of improving a property. Now-a-days they are conducted to "find" something so the CA's have job security. 2. In the past REAC was conducted with the mindset that our residents should receive safe, property monitored, affordable housing. Now-a-days the inspectors have the incentive to issues lower scores because it means more [illegible] in annual inspections! (the lower the score, the more inspections get to be done) 3. As owners we were "requested of" in the past when an issue arose between a property owner and HUD. Now-a-days every letter sent to us (MOR, REAC, contract renewal) starts cordially but always ends with a threat for non-compliance. How dare HUD threaten us in every letter? By the way all of my properties have good MOR and great REAC. This is not being [illegible] because I'm flunking.
1. EIV and REAC website is down a lot. 2. Too many forms. Too much paperwork. What happened to the paper reduction act? 3. When you call the help desk sometimes it takes days or a week for someone to call back. If you are not at your desk you have to start all over and wait another week for a phone call. 4. Some of the HUD's mandates are impossible to follow. Especially when you can't talk to anyone to get answers.
I think that USDA rental assistance and Sect 8 should be more flexible in rent changes. We have had a tenant that rent change was late and had to spend 10 hours to correct a \$250 mistake that cost \$2500. Doesn't make much sense to me.
Our agency deals 100% with the ... area office. Paperwork, HUD directives, reporting requirements have created extreme burden on operations. REAC is a farce.
... HUD office is a joke. Three years in a row they sent letters giving us dates for Management and Occupancy Reviews and three years in a row they did not show up. First year, they called the day after they were scheduled to be here and said "family emergency." Second year, rescheduled due to no money and then cancelled the second time, no money. Third year, I am still waiting for them to show up or telephone. 2005! The

Contract Administrator employees we now have are arrogant, condescending, and very unpleasant. They smile at me and are very unpleasant to my resident manager. A woman I hired in 2007 (the first year we were assigned to the ... Contract Administrator) as the Resident Manager (18 years as a legal secretary) quit after five months, citing the intimidation from the Contract Administration employees and the mind-boggling paperwork requirements. They are not helpful or here to help guide projects into compliance. Their goal is to show how smart they are and how stupid we are and to accumulate findings for their bonus! They also require things that are not required by the 4530.3 HUD Handbook. I developed this project 29 years ago and not one piece of paper makes this project any safer, cleaner or better maintained for the tenants. I have had three REAC inspections, 1999, 2002, and 2005, all with scores of 99+. They haven't been back. I just sold the project and the primary motivation was disgustingly fed up with burdensome and unnecessary paperwork that no one reads or pays attention to the Contract Administrator. Thanks, I am sure this will go no place, just more unnecessary government spending and crap.

Re: Limited Distribution and Residual Receipt. My relationship with HUD for the past 50 years has always been very satisfactory with but one sour spot. I was the first to successfully process, build and close a LIHPRA project. This is a ... unit project in a ... county-seat. We are in our 38th year of a 40 year loan and have a perfect payment record. The project, in fine condition, is fully rented and is considered to be an asset to the community. It has won several awards. Our Reserve for Repair and Replacement is triple the HUD requirement. The "sour spot" is that we are still burdened with a Limited Distribution based on 1988 dollars. Our frugality and good management is severely penalizing us. Our federal and state income taxes are based on our taxable income – not on the allowable distribution. The tax leaves very little to the owner and will soon exceed our allowable distribution due to the Residual Receipts quarantine required by the old requirement, although it has no practical use. When the mortgage is fully [illegible] two years hence, these requirements will remain in place and the owner will be in an even worse situation – the taxes will surpass the Limited Distribution and the owner must provide the short-fall from outside sources. In short, he will be in a permanent losing situation on a successful project. The Plan of Action has HUD and us in a contractual relationship for the next 34 years after mortgage pay-off and the Limited Distribution will make our loss due to taxes even more onerous. We have asked State, Region and National HUD for some relief but no-one makes a suggestion. I know that there are many other projects, built in the same era, that are in this position. Surely, HUD doesn't want us to walk away from good, viable projects. Can you get anyone's attention to this problem faced by a number of owners??

HUD field rep in ... v. Good – ... contractor for Sec 8 poor – HUD inspections ok those inspections by REAC poor.

HUD used to initiate rules, regulations and policies, now they give you guidelines to follow and leave it up to owner, manager to initiate although still making procedures difficult to follow and all mandatory – very complicated. Need to post more sample approved policies, rules and procedures to use. We used to always enforce policies, rules and regulations that were sent to us. Now they make and change all on a regular basis. HUD does not allow Contract Management to keep approved rules and policies from year to year so have to redo everything yearly – rules – Application, tenant selections, etc. They should keep on file all that has been approved then just highlight what areas need to be addressed. Reading the HUD 4350.2-3 chg is like reading an insurance policy – they talk in circles – confusing – EIV is now mandatory – not user friendly and is off line more than on, and only gives you quarterly info which is not current.

Our office works with the ... Office project manager .... She is excellent to work with very interested in seeing things are correct and explaining to our office.

For the most part we have been satisfied with our interactions with HUD-one suggestion for improvement would be when calling Washington DC to try and make the wait time shorter. I realize this is a national office and it may not be possible.

The HUD help desk is not well regarded at all and has only responded to our organization one time out of approximately twenty inquiries. If we had

<p>quick responses to our technical questions we would be much happier with our HUD relationship. At this point the help desk is absolutely worthless because they never call us back or respond to our emails.</p>
<p>My biggest source of dissatisfaction with HUD is that the asset managers do not visit the properties to see how they are functioning. Decisions are made without seeing what is going on in the field. HUD's third party contractor, ... HAP Administrators, has done an excellent job monitoring the Section 8 program.</p>
<p>I have been having problems getting into the EIV system. You can see why I answered some of the survey questions as I did. I have emailed, mailed different things to get access. I have left messages. I haven't gotten any further than I did when I started this process in November. I would appreciate any help from HUD so I can be in compliance with the HUD regulations. My third party has made suggestions on who to contact but still have not heard anything back from HUD. Please help!</p>
<p>We never seem to have contact with HUD. I have owned these apartments for 36 years. At first HUD was friendly and obliging and we knew reg [illegible] on a first name basis; now ... has taken over and everything has to be by the three two thousand page books. Then that person at ... disappear! HUD has been completely shut out. - I am sorry for them. They used to do a splendid job. Sorry.</p>
<p>Abundance of repetitious paperwork</p>
<p>I am an onsite manager of an affordable housing project. We are project-based Section 8. We have residents that pay (0) rent. I am aware that life happens to people from all walks, however because residents talk and correspond with others, it is the goal of some to get a project-based Section 8 and therefore, once on, become unproductive, unmotivated and self-reliant (sic) on a system that causes handicap and independence (sic) on a program that is broken. How can HUD allow people who are healthy and capable of being self-sufficient to pay (0) rent? And have (0) income? It is impossible to live with no money. As long as the paperwork that is required for HUD is completed every 60 days, this system continues to encourage this behavior and not enable independence. It is unfair to the taxpayers to continue allowing those that take advantage of this program to continue without some responsibility on their behalf. Residents should not live "free" but at least be charged a monthly rent of at least \$25 or a small, set amount. I as a taxpayer and manager of this kind of housing am dissatisfied with how my tax dollars are being spent on a population that has become disenfranchised from the rest of society. They have given up because the system is broken and there is no consequence. As a government agency such as Public Assistance, why aren't rules in place for Project-Based Section 8 properties that have requirements such as job training, transportation, child care, etc. to encourage self-sufficiency? HUD's system is broken and the elected officials locally and government are to blame for the handicap that is afflicted on the low-income/affordable housing market. Thank you.</p>
<p>The primary reason that I am opposed to government involvement in my health care – or any other matter – is due to my experience working with HUD.</p>
<p>HUD would like to reduce fraud and abuse in its programs. This is a good idea. Most owners would agree. The EIV program is a start. Most responsibility is put upon the owners without providing tool when illegal or wrong occupants are suspected. The owners are managers not investigators. HUD has access and can get authority to review databases to investigate these situations.</p>
<p>HUD is rule driven instead of being results driven. They consistently find rules to hinder results instead of allowing the rules to produce positive results for the people – they are commissioned to SERVE. HUD is not user friendly</p>
<p>The HUD Fair Housing Offices threatens and intimidates as well as implies guilt w/o any common sense investigation. HUD field offices are more into the "I caught you doing something wrong" than "I am here to help you." HUD staff and HUD Fair Housing tell you they are not there to provide assistance or interpret policy or policy advice just to investigate complaints. HUD staff and Fair Housing do not have consistent procedures</p>

and/or advice when asked for guidance.
The handbook 4350.3 needs to be rewritten to include EIV and be consistent throughout with the numerous changes that have been made since the last revision.
HUD now no longer deals much with property. Third party contractors are a step in right direction. HUD oversight continues to make matters worse. HUD employees and their thinking process would never be effective in today's business world. Less government governs best. That will never take place in this country. Paper work continues to grow. More effort on property now revolves around reports etc. Just let me manage the property and HUD hire competent employees to inspect property (REAC). Make things more simple for all. Save government help and allow us to manage our property like we do other properties.
Over the past couple of years HUD makes policy and regulation changes without checking the change all the way through. As a result documents that are required are issued in a hurry and then implemented over a short period of time. The changes occur so quickly that you cannot get a change into effect before another change replaces it. This creates confusion for my tenants, my manager, my management company and me – not to mention the expense involved to the property for redoing things!
Some individuals at the field office are great: ... – great director; returns calls, offers assistance. ... – always returns calls, helpful, informative. ... – always available to offer assistance, returns phone calls, helpful. Each has offered excellent support!
We feel the PBCA are not being helpful in providing assistance to management agent. They do not come across as being friendly and helpful, but as treating and mean. Scaring staff to no longer want to work with HUD regulations. Therefore justifying the or existence by having to hire and train new staff that does not have the years of experience that are required to run the apartment complexes.
We need larger projects for 202 program with many more units available
HUD has too many complicated regulations that make it confusing, time consuming and not profitable to deal with. Getting rid of our project based Section 8 building.
It is next to impossible to get anything done thru the local field office. However, we feel that if we were to complain or ask for another CA, we might really regret it. It takes a minimum of 30 days to get replacement reserve money. On the other hand, ... has been very helpful in many ways!
Too much regulation in rural areas. Rural areas do not have the problems big cities have, yet we have to go through all the bull crap that the big cities create for us.
I think that HUD wastes money that could be used for other things. I feel REAC and ... are low-trained employees that have no knowledge of what they are doing. HUD needs to take back their own field work.
Typical gov't – over regulation – often times w/o qualified staff people.
MFH has a reasonably good reg book. The F.O. Is not nearly efficient as it is for public housing. It took 15 months to finally get EIV for MF employees. It seemed no one knew how to get us in the system.
The website sucks. In order to find something, I have to go to Google, search terms, and then click a few links. I haven't gone directly to the HUD website in over 2 years. What I am usually trying to find is current median income limits or info about specific lead point rules. It shouldn't be that difficult to find this basic information.
Simplify the financial reporting.
... office is efficient and helpful. ...and ...are extraordinarily helpful - they work with you and not against you. Top notch! The REAC inspections

<p>vary widely in quality by inspector to inspector. Greater consistency would be helpful. We are generally unaware of HUD online training or video conferences - you should promote them more.</p>
<p>The financial reporting requirements i.e. audits are both repetitive and unnecessary for smaller projects. There tends to be too much compliance and too little help to actually improve projects. The burden of compliance with all the new forms and rules and regulations that constantly change are burdensome and from an owner's perspective are more of a hassle to the tenants and stuff than a help.</p>
<p>HUD has far too many policies and regulations. They use a one size fits all approach that does not fit all properties. In order to manage a HUD property it takes twice as much effort and cost. The red tape is horrific. It is designed so that the managing agent or owner does all the work and shares none of the reward. HUD expects a lot out of owners but not themselves.</p>
<p>REAC inspections are too cut and dried. A cupboard could be torn off the wall or missing "or" a cupboard could have a small scratch and both would get written up the same: "damaged cupboard." Need more tolerance or have contract administrator inspect at annual review.</p>
<p>Our property is a HUD 202, started in 1989. We recently refinanced 9/2008 and the closing was at the ... HUD Office. The loan closer was the most unprofessional business person I've come in contact with in my 34 yr. Banking career. Our mortgage broker, an ex-HUD official from ... was appalled as well. I hope she has retired as she is casting a very negative image for this office and the entire HUD organization.</p>
<p>The regulatory requirements are over burdensome. This makes dealing with HUD extremely time consuming and thus extremely expensive from an administrative standpoint. If the programs could be streamlined from a regulatory standpoint they would be much more beneficial to tenants and landlords.</p>
<p>Being a new manager and only person at property. There is no link for managers to get a simple answer to a question.</p>
<p>... Sir, sorry for the late response, just forgot to complete. We built one HUD project in 1978 and a second in 1979. We had very good relations with had for all these years. When ... took over for HUD regarding servicing, it has not worked out too well. Almost every time we have our yearly meeting with ..., problems arise. Obviously their training of staff is insufficient. Secondly they look for anything to write up. The old system of HUD monitoring our projects worked well. I have no idea what the cost is for ... to monitor a project, but it has to be substantial. Many times we have had to contact HUD regarding incorrect information by the ... group. HUD has always responded quickly. I invite you or anyone of your staff to visit either of our projects. If our government is looking at cutting costs for these subsidized projects, then look at going back to the old system of HUD monitoring the projects.</p>
<p>In HUD LOCCS Obligation/Expenditure reporting (monthly) HUD only give 5 business days to report prior month data. This is insufficient time frame to close the books and record all transactions. I suggest at least 20 days to report the data.</p>
<p>I find the ... office approachable and professional. Some asset mgr's though don't respond to requests. ... not so much as well as ... – very confrontational and not prompt w/ answers. I would have to say ... isn't much better than ... . The C.A. All interpret regulations differently which is very confusing.</p>
<p>I have a good relationship with the local HUD offices and am very satisfied with their knowledge and assistance. I am very dissatisfied with the constant changes being made in procedures and policies--i.e., stating something is mandatory by a certain date and then the system isn't even working. EIV changes are ridiculous and constant - too much paper work. How many Rules and Regulations do we have to sign in so many different ways? Just let us do our job without all this extra paperwork from HUD. It's a fulltime job to keep up with the changes.</p>
<p>Our Section 8 New Construction Property is overseen by ... State Housing Authority acting as HUD's Contract administrator. We are very dissatisfied with them. We would prefer to report directly to HUD.</p>

<p>HUD employees seem to be more interested in preserving their jobs than they are in making common sense decisions. HUD regulations are WAY OVER THE TOP and it takes an army of people to enforce the regulations.</p>
<p>They survey was sent to ... Non Profit. ... is a group home for developmentally disabled adults that have Section 8 rental assistance. HUD's subcontracted monitoring staff for years has used the Section 8 Multi Family Monitoring checklist to complete Occupancy Reviews and it just doesn't work for Projects like ... . The checklists, forms requirement, selection policies and procedures are geared toward fully functioning individuals living at ... who have drug issues or are felony sexual offenders. The fact that they are sex offenders or have possible felony drug convictions is directly related to their disability. One of the individuals was court ordered to ... because it offers 24 hour supervision needed because the individual doesn't qualify for the Section 8 Assistance offered by ... because of sex offender status. Also, asking residents to sign all of the documents required by HUD checklist when they can't read, or comprehend what they are signing is demeaning.</p>
<p>We work with the ... HUD Office and for the most part always work well together. Main complaint would be the constant and growing amount of time and money we need to spend to satisfy more and more and more requirements imposed by HUD regulations.</p>
<p>They need policies that all housing's can use that way we have something to go by. It would be nice if the directors could get on the government health ins plan. They want to go green and I understand that but we are constantly getting more and more paperwork to do. We have all this stuff to get done and deadlines. HUD calls and they expect you to drop everything and get done for them what they want.</p>
<p>Consistency with the REAC scores/inspections/ inspectors and more clarity with HUD program rules/guidelines would be a huge improvement. Thank you.</p>
<p>We are recommending the implementation of HUD team coordinators to work with the housing management companies on a regular basis to review their property needs. By doing so, the various regulatory requirements that are continuously implemented by HUD can be incorporated into a master plan for the housing development, which will then facilitate the timely submission of budgets for capital improvements and operating costs. The Coordinators would also be responsible for assisting the property managers and owners in guiding their project through the various channels at the local HUD Field offices to meet various objectives of the project managers on a timely basis that are required by HUD.</p>
<p>Help desk – not very helpful – Poor attitudes – act like you are bothering them. New EIV System is a mess – down frequently – Just when you learn new rules or regs they change.</p>
<p>1. HUD REAC inspections are very inconsistent with their point system and evaluation. 2. The history of the property is not taken into consideration. 3. The REAC inspectors are rude and unprofessional. 4. Better training should be provided for these inspectors.</p>
<p>#1. Please see question 10. HUD is a maze which is near impossible to navigate, layer upon layer of bureaucracy. One cannot get a straight answer from anyone. They refer you to the manual, which is over 900 pages long. #2. Please see question 9c. We found it hard to sort out exactly whom we needed to contact about what. #3. Our experience dealing with state housing agency was better. They helped interpret HUD guidelines. #4. We had only 5 out of 25 units in a subsidy program. The volume of paperwork and learning curve, as new owners inheriting 5 units in a HUD program with only 1 ½ year left before opt-out option, was intimidating. There was always an implicit threat of severe consequences if we made a mistake. We opted-out at end of contract. #5 This is our most important input, in our opinion. This concerns the power that HUD has given to non-governmental entities in the area of Fair Housing investigation and enforcement. A "cottage industry" of fair housing enforcers in our state has been created by HUD's empowering them to take on an investigative and enforcement role. This group I am addressing seems to report to no one at the governmental level. This group in particular has the stated mission of "educating the public to promote fair housing" when in reality all it does is intimidate housing providers, extort money from them (frivolous lawsuits) instead of educating them and in general create a</p>

climate of fear in the housing industry in our state. When we had questions about our apartments being targeted by this group, we contacted both HUD and our state housing authority to get information on what we had allegedly done wrong in the area of fair housing. We were told by both entities that they themselves had no record of tenant complaint against us, but that we should be "careful." No information or guidance at all. No one would go either on- or off-record to address this fair housing group. I am attaching a report I found online regarding Fair Housing in ... state. It is quite long, but I have included it all so the last comments will be in context. I have highlighted applicable information on pages 22, 28, 29, 31, 32, and 33. The report concludes with the verbiage "establish one agency as the central point of contact for affirmatively furthering fair housing in ... state." In our opinion, the one agency that should be furthering fair housing should be either HUD or ... State housing authority, not a quasi nonprofit cottage industry which relies on settlement money from frightened landlords to fund its budget. Thank you for taking the time to read our response to your survey.

... is the worst HUD office I have ever dealt with. I have dealt with 9 HUD offices and ... sucks. The people are stupid and lazy. They have to remember they service the people and not themselves.

HUD has a real problem in communicating with each other. Many of the rules/requirements have not been thought through before implementation. There are major problems with EIV, the MOR process and huge inconsistencies with policy and procedures.

The excessive micro-management from HUD concerning ARRA was not necessary.

Regulations: Many of HUD's regulations do not work well with sole proprietors/PHAs in small towns and cause large financial burdens. Example: FASSUB requires an AUDITED FINANCIAL STATEMENT (AFS) certified by a CPA costing a minimum of \$3000. There should be a cheaper solution. AFS's should only be required if you have a low REAC inspection score. The data obtained in the OCAF budget worksheets could replace the AFS. Or some other FREE means of reporting from small properties in small towns.

Don't enforce a regulation or requirement just because it's a regulation or requirement. Don't offer waivers if you're never going to approve one. I've heard this right from HUD: "We offer waivers but have been told we will not approve them." New owners: Prospective buyers or new owners of HUD project properties should be given an introduction to working with HUD that explains what's expected of them well in advance of purchasing the property or contract. This should be handled by the HUD project manager. Detail would be nice. Online support, etc.: There should be no delays in getting passwords and user ID's. Ten days through the mail is a huge waste of time and totally old school. Working online, using the handbooks or manuals should be made simpler. The manuals should be in one location and in one up-to-date document. If the website asks if you want to view the document and you click yes, the document should open and not ask you to click on another link to view it. There are far too many layers of documents linked to one another. Just give me the current one. I don't need to spend time reading a document only to find HUD has stopped using it. I would trim out all the extra junk that's expired or outdated. Many times I've been directed to documents that were expired or replaced or that simply did not pertain to my situation. I don't need to know the history of a regulation. I've spent hours looking at documents that were useless. It would be great if sole proprietors had their own section. Half the time I don't know if what I'm reading applies to me. The first few times I used APPS I had one hell of a time finding the login screen. Timing: Many communications are sent with deadlines that are far too short. Even this survey dated May 27th arrived on June 1st and is due June 4th. You could have given us a few more days. Had I been gone on vacation, it would have been returned late.

The ... HUD office I am under is extremely helpful and timely. I do not like the inspection people at ... housing. The inspectors change every year. Each inspector has a different answer and different way of inspections. They confuse me so much that every year after my inspection I want to quit my job and retire. I've been here 22 years. The HUD office itself helps anyway they can. ... Housing ... has new graduates right out of college

that have no idea what it takes to manage a property. Rules, rules, and more rules until you have no time to take care of your residents like we use to. Retainage of residents gets harder when you have to spend more time on paper work than with residents. HUD did better inspecting us than ... does. We knew our HUD Asset Managers and what they expected. We do not know who all of these young people that have never managed apartments and never know what each new inspector will expect or change.
We are noninsured sec. 236 prop.
Been wasting huge amounts of time on 2530/APPS. Stupid process run by stupid people and it doesn't get the information you think you want.
Most HUD Reps I deal with are great – providing support and clarity. 1 HUD Rep is not helpful in the Multi-family Sec 8 Department and does not explain things well or helps. Public Housing Staff is fabulous. Finance and Sec. 8 voucher is fabulous. State Dept. of Commerce is not so cooperative and federal funds seem to all go to homeless programs only.
Extremely dissatisfied w/ REAC inspectors. On two separate buildings had scores go from 90+, made improvements, then scored 60+. Appeals did no good. Within next 2 years, back at 90+. Only difference was very inexperienced inspectors with their checklists. I could flunk a brand new property using checklists if picky enough! Even local HUD offices have NO use for present REAC system.
Our current asset manager is excellent, especially compared to our former manager. She is responsive and easy to communicate with. I have also had very good interactions with some HAP personnel. I think that [illegible] personnel are too frequently rigid and mechanical in demeanor. They find our mistakes, but if they make a mistake, it will never be acknowledged or admitted.
Very dissatisfied with HUD's use of third party contractors to perform REAC inspections. One such contractor described the competitive bidding process for the work and warned that the process required aggressive reviews.
Frustration over the EIV system - 1 <sup>st</sup> to get on them now to use (system down and not accessible). HUD needs to simply their procedures – Too complicated and focus on making residents responsible.
EID – has been an extremely difficult to enroll, access, acquire information. REAC – Surveys our homes; ... – surveys the same things – seems like a duplicate service and waste of money. HUD – rules and regulations are massive – fills a 4in binder; are difficult to understand; change frequently requiring development of new policies and procedures.
Our problems lie with the CA in ... We feel there is way too much paperwork and common sense answers don't apply a lot of the time.
My projects are very small = 2 four-plexes. Mr. ... in the ... office of HUD is prompt, polite and helpful! ... Housing Development Authority drives us nuts with picky details. So much detail I am trying to get out of one Section 8 contract because my four-plex is in a small community with no tenant app's for qualified persons. ... has not acted promptly on this request.
There is a very blurry line between HUD hub location and the Contract Management in regards to helping owners and agents with the everyday questions of managing a complex. Whenever there might be a question regarding tenant issues, it requires many phone calls to get to the right “department” and then there is much confusion in dealing with the situation. It usually comes back as whatever your interpretation of the manual rather than someone taking ownership in the question and helping find a solution.
The HUD – ... Field Office and ... – HAP has been great to deal with, providing great guidance to our property. Would like to see HUD offer training for properties on HUD's Multifamily online system, and how systems relate to one another--i.e.: REMS, EIV, APPS, etc.
The contractors for HUD that I worked with for the past three months were very professional and made it very easy to work with them.
The ... from ... would be more helpful if they were trying to help us do it correctly the first time instead of looking for errors that they could have forewarned us about. It would be helpful if they would prepare a sample tenant file, showing what they want in the file and how they want it filed.

I would like to propose that you consider having the Contract Management Services that you hire be more proactive, by helping us, if a form is missing or a policy needs redone, then notify us and let us go forward by doing it right for the current year, not having to do it in arrears for the past year. If they want a change in the Policies they should let us know when the change is coming and help us redo our policies, not just come in and do a gotcha. Also, instead of coming in to go over files, ask us to fax or email random files for them to check, as they are re-certified, not months later. Also I think a major review of the Multi Family required forms could be done. My tenants are mostly in their 80's and 90's and many of the forms are redundant. If a move in booklet and recert. booklet were put in place of the current individual files, that only required one signature it would greatly reduce the office work by not having to search for individual forms and also the elderly tenants would not have to sign so much. ... should be seeing how much assistance they can provide us, this would greatly improve our ability to do it right the first time.

The programs seem to be constantly going thru changes. The rules and regulations change frequently making it hard for a small agency to keep up. There are changes being made to SAGIS and to PHAS before they have everything ready to work. This creates constant turmoil for the people trying to use the systems properly and trying to stay in compliance with the rules and regulations. I think all system should be up and running before the final regulations are put into action.

In my 17 years of working with HUD I have worked with many third party administrators. Currently, I have within my portfolio ... and ... special housing. The difference in approach by ... is alarming. Both other contract administrators are a pleasure to work with as is HUD. ... has the "GOTCHA" approach and it really makes it undesirable to do business in ... . Any questions call me? ...

HUD and USDA needs to get more in sync. They both want to be the boss and have it their way.

Please quit writing notices to the tenants with legal mumbo-jumbo – it scares the tenants. They don't understand the language you are using.

Contract administered by ... . Regulator has cited violations of HUD regulations that are incorrect, and has a very strange "interpretation" of HUD regulations. We have frequently had to protest her findings, and show in black and white that they were wrong. It would be fair to say that she "wings it", and applies her own personal slant to regulations, often adding things to the regulations that aren't there. HUD wastes tremendous resources regulating non-problem projects. If they'd leave us alone and spend more time fixing problem projects everybody would be better off. Overall ... is a bureaucratic nightmare that needs somebody to regulate it.

1. HUD policy, i.e. Preservation, is made on an ad hoc basis and not in writing. 2. HUD contracts out most monitoring functions and as a result most HUD MF staff do not know the properties assigned to them. 3. HUD MF staff, especially hires with less than 10 years' experience, do not know HUD policy, regulations. They arbitrarily interpret HUD policy based upon intuition and feelings rather than research and legal interpretation. 4. HUD provides little training to the industry anymore. 5. Contract Administration (PBCA's) often have attitude problems, are rigid, misinterpret HUD regulations and are not properly trained to perform reviews, to make proper findings. 6. Local HUD staff have little or no control over REAC, PBCA's or FASSUD. Authority should be reserved for them to handle appeals. 7. HUD handbooks are way out of date. 8. Most of the functions performed by HUD MF staff are clerical in nature. 9. Many HUD policies (investment of funds, replacement reserves, etc need to be updated.

I find the employees of HUD to be very race biased, lazy, mostly not responsive. They will not take a stand against tenant fraud. They always take the side of the tenant. I find the employees not familiar with the regulations. HUD always holds the owner responsible for all tenant mistakes and omissions. Executive level employs are incompetent and do not care. Employees are bureaucratic and although they profess to be tenant oriented they truly do not care about the tenants only the regulations. Service contract administrators are inconsistent in what they audit from year to year (15 years). They are not goal or result oriented, they simply want to find ways to charge the owner money and write up negative comments. Life is a service business. We are here to help each other. Government, HUD does not "get it."

Our HUD rep is afraid to make a stand on any item or question. The fear of being held responsible is palpable and frustrating for property managers. We request assistance with problems and will get not response at all – unacceptable! Ignore us and we will go away.
HUD keeps doing a great job.
We have changed management firms recently and do feel that resident manager (needs more assistance in working) with HUD systems.
HUD needs to have (go back to) yearly training on requirements, regulations and implementation of programs and financial requirements not just (1-2 hour) sessions at other conferences or by the web site. HUD needs to simplify requirements for rural areas and small agencies and get practical on over-all requirements and regulations. Changes need to be made in the portability of Section 8 vouchers; and clients more responsible, like the private sector who do not receive assistance.
Hire a company to do this survey, why when it won't be used or tax dollars saved! Our Obama tax dollars at work.
Property inspections are stupid. Computer choices for property condition are ridiculous. Changes in forms/regulations are very expensive for owner, and meaningless for tenant service. Having to redo tenant leases is expensive. Changes in forms without substance happen frequently and only add to the cost of compliance without any improvement in operation or service. I would never advise anyone to invest in a HUD subsidized project!
... is very helpful.
Everything we do is with a contractor. They are ok but over regulated by HUD which over regulates. HUD needs to be more aware of the differences between rural and urban housing needs and challenges. Stop applying metro policies to rural properties.
The REAC (EIV, etc.) never respond to your e-mails, phone calls, etc.
HUD staff desperately needs to become more interested in housing and less obsessed with the implementation of its thousands of pages of regulations. The regulations are so massive that you can get a different interpretation of the rules from one project manager to another with way too much frequency. Some project managers appear to delight in changing their requirements from month to month. HUD staff will blindly implement regulations even if the implementation creates absurd outcomes which are detrimental to the housing. OAAP's third party private contractors are particularly awful to deal with. Their reports are very difficult to understand and they have no wiggle room on regulations even if their actions harm properties. It takes way too long to get a 2530 approved. There very badly needs to be a guidebook for how HUD programs interact with Low Income Housing Tax Credits. There needs to be more consistency in how the contract administrators regulate the projects from state to state. For profit developers who use Low Income Housing tax credits should not be treated like pariahs for profiting from rehabbing the HUD housing stock. Just a little more concentration toward housing advocacy would go a long way at HUD. HUD has well earned its reputation as a terrible federal agency to work with.
I think HUD is making a mistake using private contractors. Also, I firmly believe that the direct voucher system would solve many problems and from a cost standpoint enable HUD to serve many more people. In addition the 30% of income is a huge disincentive to work your way off of HUD. This should be dropped to 20% or a 15% of an employment income.
I feel that the HUD hub that we work with is very professional, timely and helpful. I would like to see more interaction with HUD-Washington. I would like to know more about the people setting guidelines and procedures and their experience in day-to-day operations offhand properties. I think that there should be better quality control on new/updated forms/regulations, etc. before they are sent out. Too much time and resources are spent on putting these items out to the properties only to be changed after errors are found on the property level.
Lack of consistency especially REAC property inspection. ... HAP is wonderful.

HUD delays in contract renewal creates owner losses in income EVERY SINGLE YEAR!!
Too much reporting. Scoring under REAC is inequitable for smaller agencies. Quicker decisions by HUD. Funds arrive too late in the year. More up to date reporting on EIV. Overall HUD does a very good job on the local level. All over HUD does a very good job at the local level.
Our management agent (agency) does most of the communication with all the HUD offices, officers, or their representatives. However, we are informed in every instance where documented communications take place between the two entities, or directly with us, as the case may be!
It is nearly impossible to reach a HUD representative. When you are lucky enough to get a response, you rarely get an answer to your question or a decision. The duplication of forms and paperwork is costly, wasteful and non-productive.
We have been extremely frustrated with ... . They pride themselves on and actually BRAG at meetings about how much money they can save HUD. They provide no communication to the property owners and provide very little guidance. We never actually can talk with anyone at HUD and we constantly have to go through ... . ... does not readily share information pertaining to HUD changes or rules. We (as owners) must sort through pages and pages of HUD clips daily to find updates pertaining to our individuals programs. It is frustrating!! All of my answers pertain to ... and not HUD!
We are a small complex and want to do our best in providing a safe and quality home for those who would not have it otherwise. We have been overrun with paperwork stating the same thing 4 different ways and while I appreciate redundancy, it is getting a bit out of hand, i.e. citizenship verifications. It almost seems as if there are others who have so abused the system, everyone else must spend extra time and resources covering HUD's backside. So they (HUD) can state they had the documentation and wording such that HUD can say "It wasn't our fault, we're covered by HUD Form XXXX-XX. It is their fault; they should have read and known and applied 4350.3." Which they no longer provide in print form. It is difficult to write "plans" going back and forth from page to page on the computer. A book would be better. If HUD would provide training to the managers / property agents, the process would be much better/smoothen. I don't know if owning a Section 8 complex is worth the headaches of the paperwork, the tenants and the toilets. Working with HUD and ... is somewhat of a guessing game.
#17 NOT listed. Our Hub is ... .
Our main contact is with the ... area office. Our multi-family program auditors cannot interpret HUD regulations; they can only 'go by the book'. For example, we were penalized for not mailing a refund to a tenant who had died with no known family. We found him in his apartment a few months after his death! We have also been required to include language in our Admission & Occupancy policy for dependent students. This is for a program with 33 apartments for the elderly! The only on-line program that is useful is EIV. The rest are a big waste of time. Most do not work correctly and everyone knows it, including HUD staff.
The job has become more and more difficult. We are divesting all HUD associated properties. HUD is no longer a "partner" and with an aging population of properties, it is more and more cumbersome to deal with HUD.
I find that some of the e-mails received are difficult to understand.
We have very good response with our contact office ... . But have had problems with REAC information, EIV WASS and TRACS thru HUD obtaining information and receiving explanation on how to obtain these requests.
... was our HUD Rep for years. She was "great." Her replacement (...) seems good as well!
1. HUD REAC Inspections are very inconsistent with their point system and evaluation. 2. The history of the property is not taken into consideration. 3. The REAC inspectors are rude and unprofessional. 4. Better training should be provided for these inspectors.
When HUD personal has a co-op to look after they should know the ins and out of a co-op. When a person needs help dealing with management

company HUD should not refer someone to choose a certain management company; that's not their job. HUD should not be attacking the co-op since they have known a management company for a long time and sends you to them because they have a relationship with that company. I can't believe some of these HUD officials. They have been working for HUD for years and don't know protocol for co-ops. Kick back money for choosing a certain management company. This is unfair. I can't believe this is happening. Please investigate this place because they are wrong. Things need to change here at the HUD Office. Thank you sooo much.

Need apps helpdesk to answer the phone! And to be available to actually help. Need to set timeframes when 2530, flag issues get resolved / response times. Need to set up a Section 8 renewal helpdesk as many contract admin don't understand the renewal system.

Our contact person in HUD is ... who takes extra time to see that our community is well represented by HUD's services.

We manage ... small HUD projects in the state of ... . The rules and regulations that HUD requires us to adhere to for record keeping and audit purposes are very detrimental to the financial health of the project. To meet all the current audit requirements, it takes 1/12th of the total revenue for the 28 unit projects to cover the audit fee. The audit fee is higher than our annual utilities for the property. We have bid out the audit and the other firms that complete HUD audits are all in the same price range and all say that the new requirements that are out there require them to complete many unnecessary procedures that have no benefit to the property and provide no useful information.

Second, we were investigated by the "Special Investigation Unit" this year. It took us four lengthy letters and supporting documents to help educate them in how to read the financial statement that we have to provide in HUD's format. The special investigator was not able to read the cash flow statement and understand that the property was operating at a deficit instead of generating cash. They sent us a notice stating that we were misallocating cash flow for the property and that we would have to start paying on the loan, when in fact the property was operating at a cash deficit and the owners were having to invest more cash into the property. When all was said and done, the Special Investigator said that they had a "business degree" and not an accounting degree and did not understand financial statements, even though they were investigating the differences. This additional correspondence added \$... to the audit fee to "educate" the special investigator since she would not accept our explanation for the difference. This was \$1250 the property does not have. We understand that you have to have a system that works for all properties, and the small ones that we have to manage because no one else in the state will take them are being unduly burdened by the new audit and reporting requirements. If there is anything that could be done to lessen the requirements for smaller projects, it would be greatly appreciated. Our current contractor we work with, ... , has been much better to work with. They completed the 2008 REAC review. BUT prior to that we received 2005, 2006, and 2007 REAC reviews all in the same week, with overlapping questions and issues. As the result of not having each of them done in a timely manner, the problems compounded and again we were threatened with having to start making loan payments. Thankfully, ... helped sort out the differences which they did not do the REAC review, and the loan repayment was cancelled. But the previous contractor again did not know how to read the HUD statements and would overlook the obvious items and assume that we were criminals. With the correspondence that we received, we truly felt that we were criminals and the auditors read the correspondence and had to complete additional procedures because of that, even though the accusations were based on wrong assumptions. We are not happy with the way HUD administers the programs and the fact that all properties, no matter the size or location, are held to the same requirements of which most of them don't even apply.

HUD, a great cause, needed, but mismanaged. Corrupt is the word! It has become very clear over many years of dealing with ... HUD, that it is who you know and what benefit they receive, not how well you do what you need to do!! We have been forced to hire relatives of HUD Personnel, pay them a great deal more than others, while they increase funding to the site to make up for the high paid relative!! Corruption and politics at ... HUD are out of control. While directors then participate in ownerships of management companies also.

Housing Authorities w/ PBCA contracts should not be allowed to subcontract out PBCA oversight. Example: ... Housing Authority.
Last year we purchased an apartment complex that was on a HAP contract. Our experience so far. 1. Our primary contact w/ HUD was extremely unsatisfactory. That employee needs to be terminated. The two page registration form took 8 tries to get accepted. 2. HUD needs to orient new owners. 3. We keep getting notices of a requirement we did not know about that are overdue or nearly so. 4. We keep getting mail from a number of agencies which apparently work for HUD we don't know who they are. If we had it to do over again we would NOT purchase a HUD apartment complex. We spend more time on this one complex than all our others.
They require too much paperwork and criticize too much. Rules need to be interpreted on your own and they will not give concrete, precise direction (I was told they were afraid of being sued). If a property proves over time to be running efficiently don't come every year and go through it with a fine tooth comb just looking for something to write up.
Too much duplication with Rural development and housing agency. We get inspections to death and duplicate reporting. Also resent micro managing.
Difficult to respond to some questions as we deal with 2 different HUD offices and 2 different HUD contractors! The level of responsiveness and satisfaction in our dealings with each entity varies greatly! The ... HUD office is very responsive, consistent, fair and supportive.
Head of HUD ... , ... , is first rate-responsible, competent, helpful, etc. His staff is inferior. One of his staff assigned to us is terrible.
Our building was not financed through HUD; it was bond-financed. Every field office that we have contacted over the past 15 years that I have been here does not understand how our financing works for our particular building. We would really like to do a rehab at our soon-to-be 30-year-old building and have been trying to finance through ... but since there is a conflict on reserve issues between HUD and ... nothing is getting done and our building is in great need of repair.
HUD regulations and contract administrators both consistently increase the amount and time required to conform to HUD's needs. No additional compensation for additional paperwork such as revising tenants' selection plans, doing EIV searches, requiring software updates is ever provided! HUD regulations consistently favor tenants over management with no consideration of the overall effect on property stability or management problems!!!
Unfortunately HUD for us is not objective but very subjective. We get reviews and inspections and there is no clarity of why a decision or rating is made. If you ask about an appeal you are threatened with repercussions of doing so by those that did your inspection. We do all we can to provide a healthy save environment for tenants but live in fear of HUD!
The people at ...are terrific: competent, friendly, and dedicated.
1. The HUD project manager is very helpful. 2. When PBCAs do management and occupancy reviews they want the same information that they get every year. It would cut down on paperwork and time if they only ask for what they don't already have. I feel they are wasting hours and time by reviewing what they already have.
We would comment on the great working relationship we have with ... . Not only do they monitor our work, they instruct us and share the latest HUD news that we may not have heard, They are very professional and respond quickly to questions.
Regulatory Monitoring and Guidance: HUD should consider becoming more efficient by handling program monitoring themselves, rather than paying a contractor. When information passes from HUD to a contractor, or middle man, and then to owner/agents such as this housing authority, this creates another layer of regulatory oversight that increases the chance for misinterpretation and errors in program administration. For example, ... asks for additional requirements from this housing authority to show HUD they are meeting or exceeding the requirements of their

own contract with HUD, creating unnecessary obstacles in administering housing assistance to clients. Perhaps it would be better for HUD to spend the funding it would normally give to the contractor to hire more HUD staff to monitor their own programs. Housing authorities are making ongoing efforts to become more efficient, while HUD appears to be doing the opposite by structuring Multifamily and PH/HCV programs separately with different rules and regulations. This system cultivates errors as this housing authority attempts to interpret and accurately apply often conflicting HUD rules. One example of this situation is the final rule that went into effect 1/31/2010 on mandatory use of EIV and Social Security Number reporting requirements. Both sides of HUD are citing the same rules and regulations; however, they are interpreting the rules and regulations differently and providing conflicting instructions. It is very difficult for housing authorities to comply with rules that are not clear and to administer housing programs to the public in a quality manner. HUD could be more effective, and housing authorities would become more efficient, if the agency could provide a more consistent and informed voice in technical guidance. Additionally, HUD could improve its process for providing updates/notices from the RHIIP Listserv (Multifamily side of HUD). Almost every other day there is a new instruction, sometimes superseding the previous instruction received just a few days before. (Example: EIV notices and updates are frequent and lengthy, making it very difficult to stay current with the guidance and remain in compliance.) Reporting: Simplification/streamlining of existing reporting requirements would be a big help as it would provide consistency across the programs. From the multifamily side, the REAC reporting, etc. isn't as bad as PH with asset based management (AMPs) and Capital Fund and the HCV program. Electronic reporting systems such as PIC could be more efficient - currently the housing authority's data is entered into the PIC system promptly, but the reports generated in PIC don't always match the data the housing authority entered into the system. This is a significant concern since the accuracy of this data could impact subsidy. Funding: The amount of operating subsidy is often not known until several months into the budget year. This makes it extremely difficult to prepare a sound budget and to anticipate and plan adequately for events that impact agency operations, programs, and services. Thank you for the opportunity to provide feedback.

1. Even though the federal gov't and Pres. Clinton approved the electronic signature act – to this day neither HUD nor their agents accept or allow owners to use elect signatures on “any” submissions, i.e., annual Sec 8 OCAF renewals ?? Why? 2. HUD takes unilateral action, at will, forcing owners to comply with expired HUD notices etc.

We have been attempting to get set up in multifamily EIV for over a year. The local HUD Office has been unhelpful – (multifamily) [illegible] ... has been unhelpful – the help desk does not respond to email or voicemail. The entire multifamily system seems to be broken.

I think the program is very bad for investors; you cannot make money if you tried. You cannot get out of the red tape. All that was making any money out of my investments were the accounts and the management company I owned this property for three years and it still cannot pay myself anything yet. They got me so far in the hole it is very bad. I am about to lose my property with the payment so high. I still owe the management company over \$9,000 an auditor \$4,500 from the last year where I opt-out 12/09. I had to keep putting money in because HUD did not pay me everything they say they agreed too. "This program sucks for owners."

I feel that my ... HUD project manager and my contract administrator (...) are providing excellent support to our property. I know who to call and I know I will get a response in a timely manner.

Sometimes we have sent requests for approval of our Affirmative Fair Housing Marketing Plan and/or Request for Security/Police Unit and it takes a long time to receive a response. It has also gotten "lost in the mail." "The timeliness of return approval for requests for reserve funds has GREATLY improved this year. Thanks!

Our project is supervised by ... (a third party contractor). If HA generally does a good job, but is unclear on the inter play between a private owners

rights under stat landlord, tenant law and the HUD regulations. The regional HUD office ignored the project's request for a substance review of the issue and simply adopted HA's erroneous interpretation of the regulations and model lease.
In addition to canvassing the owners, I hope that you are also asking the input of our property managers who deal directly with HUD for most items on this survey.
#17 My property contacts ... HUD office.
Our company is dissatisfied with the timely manner on waivers and request for removal of properties from program. Takes way too long.
It's more an obstacle than a facilitator. We don't receive the same information from different employees. REAC inspections are a catalog of arbitrariness.
I strongly believe that the financial audit HUD requires us to perform annually is a waste of money and time. It is looked at by HUD, yet it costs us significant financial resources, If the property is not financed by HUD, it should but be required to submit audited financials.
We have been extremely disappointed with ... office, in particular ... . She is uncooperative, makes "unique" ... policy often contrary to the rest of the country. She is obstinate and always unwilling to appreciate the other side of discussion. Some of the policy simply defies common sense but she is unmoved until an appeal is made to Washington which has overruled often. The resulting delays and frustration is often overwhelming. Communication with her office is mostly of the negative policeman attitude. We currently have two issues which represent "unique" ... rules which likely will be appealed and hopefully overturned. She has the unique ability to turn every contact into some dragged out, logic defying frustrating encounter. She would never last in the job if it was private industry.
1. Local office never follows the timelines as per handbook but want owners and management agents to respond within prescribed timelines. 2. Appeals are never granted, nor request to change project managers or terms EUE if there is a conflict. 3. Paperwork is never received at local office unless there is some way to track it. 4. Local office interprets rules, handbooks and directives at their convenience. Rules are not applied uniformly. 5. Fire all HUD personnel. Have a PBA takeover all oversight. 6. ... are not GODS. But do act like they are.
REAC has a purpose but the scoring is very unfair for smaller units.
Very complicated useless paperwork!! Not profitable.
For the most part, HUD does as good as can be expected for a bureaucratic organization. My two greatest complaints would be: A) Secure Systems - this system is designed terribly. It is not user friendly, it is cumbersome to move through, and is poorly inter-related to itself. If HUD wants this system used more widely, they should look at its design and attempt to facilitate a better user experience. B) Physical REAC Assessments - This still varies too much from inspector to inspector.
HUD rulings are very hard to follow, you are given certain guidelines to follow, before you can really work with it, they change the rulings to something different. Section 8, needs to be revamp, the way it is presented to HUD's projects in general, does not fit well. All people are not too good at accepting the help; they will tear your property up, then the inspector will order you to fix the same problem over and over again.
When preparing my budget last year I had a HUD employee lie directly to me and received conflicting information from HUD and my contract specialists. Employees in both places were rude when questioned on conflicting information. I have documentation on this issue and am still appalled that the very people I am supposed to count on for guidance can lie to me and have no consequences.

**B. COMMENTS FROM HUD-INSURED OWNERS**

<p>REAC inspectors are out of touch with reality; one cricket does not make an infestation. Inspections should not be black and white. Hire people with basic sense and let them use it. Some subjectivity can save time and money. Certainly properties should be well kept, but if a branch happens to touch a building, "encroachment" and a loss of many points doesn't make sense.</p>
<p>As the developer of over 10,000 affordable housing units and a company that has completed more than 20 HOPE VI developments, we would first like to commend HUD personnel responsible for dealing with this program. These very complex transactions are handled with the utmost professionalism. The single area of greatest concern for us is the lack of clarity and transparency associated with the ACC/PEL computations. Our ability to interface with HUD through various Housing Authorities varies greatly from region to region and Housing Authority to Housing Authority. In general, the ACC subsidies provided are not sufficient to operate properties in a financially sound manner. That situation is compounded when subsidies vary greatly from year to year without explanation. Any clarity that can be brought to this situation would be greatly appreciated.</p>
<p>HUD needs to re-implement insurance for smaller numbers of units 4-12 on a fast tract basis to allow infill and place affordable housing closer to jobs.</p>
<p>HUD has shifted its focus from housing and urban development to housing and suburban garden apartment and sprawl development. This is socially irresponsible and is bankrupting America and causing great harm to our environment. HUD should re-shift its focus back to urban development. This is a national priority not one that can be solved at the regional level.</p>
<p>We have a couple of HUD-financed properties not subsidized. Then we have 2 515/section 8 subsidized properties. Most dealings are with the Contract Administrator.</p>
<p>It was very difficult to get HUD audit reports submitted to REAC electronically.</p>
<p>HUD ... staff are excellent!</p>
<p>Director level positions with HUD are very responsive, knowledgeable, etc. Staff level positions tend to be challenging to interact with for a variety of reasons, including competency, willingness to give feedback/decisions and flex hours. In our dealing we had a staff person who worked in the office only 2 days from the hours of 7 am -2. The ability to get the approvals we needed took probably 3 weeks longer because she had to be in the office to get or send paperwork per discussion with a colleague. It was beyond frustrating. The schedule with a clear lack of concern for urgency was very upsetting for our organization, friends and partners. In regards to interaction between HUD's internal depts. and with the states when they act as project-based contract administrators, there is a lack of coordination with the sharing information and direction given to owners and managers.</p>
<p>This survey is another waste of taxpayer money!</p>
<p>Major areas of dissatisfaction: Ongoing implementation of EIV, consistency and clarity of MOR? Reviews, consistency of REAC inspections, and competency of staff at ... HUD office.</p>
<p>The HUD APPS system is a disaster. Support from HUD on how to work this system is a disaster as well.</p>
<p>We sold this property on ... /09</p>
<p>The HUD location we contact is located in ... .</p>
<p>Those contracted to conduct REAC inspections are sometimes too ridged - sometimes common sense could be helpful.</p>
<p>Recent HUD REAC inspections by contractor did not provide adequate forms for inspection response, resulting in issue with ... HUD office.</p>

<p>The basis for the negative response is based on a third party inspection of a secure wing of an assisted living facility which when inspected by HUD received scores in the mid-nineties. The third party gave a score in the thirties because the casement (ends there)</p>
<p>The additional requirements of EIV have turned every property manager I've met into an enemy of HUD. The time requirements, reporting requirements and inspections by contract administrators are onerous. They add such a burden to running a property you almost have to have a separate person whose only assignment is EIV. This is a clear case of an agency gone wild.</p>
<p>I have high regard and respect for all that manage my HUD programs. I believe the only problem is the consistency between the different offices. Great program I would like to see no change to the 2008 criteria.</p>
<p>Make the fast sub on electronic filing more user friendly.</p>
<p>Disappointed with how long it takes to process HUD 232 loans. Takes much too long and the new under writing standards are much too onerous.</p>
<p>EIV is a complete bureaucratic mess. For it to make things "simpler" and "more efficient" it has evolved into another level of bureaucracy that is very time consuming...and not consistently accurate. Our PBCA does a great job of communicating and partnering with us. REAC is very inconsistent. We have tried to get our HUD units back from HUD ..., but HUD is making it impossible to accomplish. Therefore, Section 8 (202) ... is missing all of our units because of HUD being a (?). This is most disappointing for those elders who would benefit...just because HUD can't figure out how to make that happen.</p>
<p>Here are the problems. 1. Rules and regulations are so massive it is difficult for local HUD employees to interpret them, in spite of the volume there is lots of room for interpretation. 2. Organizational hierarchy makes decisions making difficult. No one wants to stick their neck out and make a decision. Either no decision or a no decision is much easier to make than a yes decision that often requires interpretation on very complicated regulations. 3. HUD employees are very suspicious; you are guilty until proven innocent. This makes effective communication difficult and often tedious. Note: I will say that after much wrangling the local office finally did act in a way that helped us out. There are a couple of decision makers in that office.</p>
<p>Our Section 8 advisor ... is a complement to your organization. She always makes herself available for walk-in support. Manages all of our tenant based vouchers and has been extremely helpful assisting us over the years. The only thing I would like to see changed is that we never fully know what will be received on the consolidated voucher check at the beginning of the month. It would be nice if owners could get a statement in advance of the first of the month containing the breakdown so that we knew what to charge our residents. The individual HAP contracts contain this information but sometimes we fail to receive a copy and are unaware of a HAP adjustment until the HUD voucher check is received!</p>
<p>1) "All" correspondence has to be sent "certified" return receipt requested to prove that you sent it and they received it. 2) Inspections are not consistent. We strive to comply "to the letter of the requirement." Recently we took over management of a HUD-insured 221(d)(4) property and found that previous management was not being held to the same standards that we were. 3) Paperwork is redundant and wasteful. Directives are stated in "legal form only." It is probably so that HUD employees will continue to be employed if they must send back your paperwork for correct punctuation, etc. And I am not exaggerating at all! It is very frustrating to have to complete their form and then the forms have limitations that are in the format. 4) All the audits that are required, i.e., the financial audits, are extra expensive, between \$4,000 to \$8,000.</p>
<p>The most discouraging thing for me to deal with personally is the lack of response from some project administrators. All of the PBCA we use are very responsive. Also the time it takes to get access keys to APOS is ridiculous - that system seems very broken.</p>
<p>My property had insured only. Our "project manager" is either incompetent or overwhelmed with work. Not very responsive, always calling asking for formal documentations that he has already been sent, or supposed to have, but can't find. He comes across subjective in opinion, short with</p>

answers, always confused or unclear with our property--i.e., every year we go thru the same gyrations on correcting him on things he says are required but aren't.
HUD: ... installed a management co to replace us (management co of ownership) too soon without assistance. Our current loan is in default due to poor performance of the management Co. I asked for another management company but my request has fallen on deaf ears. I asked for a waiver but to no avail.
Very slow response time from our HUD Rep - sometimes multiple emails and phone calls are needed to get answers/approval. Staff makes me feel like my questions are stupid when I ask for help. I often feel upset at the communication style. It seems like we get conflicting information and minimum guidance.
1. We like the fact that HUD is still available to underwrite multi-family loans. We use HUD's ability to credit enhance Tax Exempt Bonds, usually along with Section 42 tax credit generated by equity. 2. We feel the REAC program is confusing. In particular it varies greatly depending on the inspector. Also, the program puts tremendous focus on things resident will change the second the inspection is over. Finally, we have 30-year old properties that get similar REAC scores to new properties. This does not compute. 3. When HUD insured property is heading into a potential default position, there is no way to work it out. The owner has to default and then either get a PPC or foreclose. This is not the way to handle a "down market."
Deal with HUD very infrequently.
Website for coordinators, etc. very bad - not user friendly and cannot get to anyone who can help with issues.
HUD has proven itself a dismal failure. Way too much time/\$ spent on incomplete REAC reports to the point where we didn't know what to do. If you ask too many questions, they send out more REAC people to downgrade your building. Overall, this HUD program is a total waste of taxpayer \$ and certainly no great deal for those who obtained a HUD loan. Buildings with HUD loans take 50 % more management time/labor than non-HUD buildings. That is how useless HUD is.
Getting a loan through HUD was the worst experience on my life. They continually asked for more documents, studies, etc. The loan almost took 1 year. I didn't understand all the ridiculous regulation associated with the loan. a) annual audits \$15k/a year. b) limited distributions to owner. c) restrict use of life of appliances. d) costly annual REAC inspectors. I would not recommend a HUD loan to anyone.
Mail, email, timeliness of responses, clarity of responses of HUD office and this party, ..., are at center of my dissatisfaction. Attitude of HUD personnel and contractors is very poor and work ethic suspect. Please keep results confidential as we need HUD programs and cooperation to serve people - however, much work needs to be done as to "who customer is." Too often, it's HUD and this is wrong and needs correcting.
We have a 223A 7 loan. 1. We are audited annually at a cost of \$10,000 with 0 findings can this audit take place every 2-3 years? It costs us more than \$170,000 since we have been with HUD. 2. In the loan is mortgage insurance. The loan amount is ... million; the building just appraised at ... million; can we get it removed? 3. The ... office has been outstanding!! 4. No names but others are in the same boat, with the economy can something be done? Pass this along please.
Would like to have more flexibility to invest reserve funds where we can get a better field. We are currently getting no interest on reserve funds held by the bond trustee or mortgage servicer.
HID ... does not recognize its responsibilities to its affordable housing stock and significantly undercuts its projects by using "... "as its contract administrator. ... is not supportive of project needs - only its own economic well-being--it over bills mortgagors on interest - REAC inspectors are more interested in visiting site annually than giving fair scores.

<p>We as admins only deal with HUD's Labor Relations officers. Upper management may deal with others. Usually when we ask a question, HUD responds to us - not quickly, but they do respond. When we need a new clarification, it takes a really long time. But HUD reps are usually helpful regarding our disgruntled subcontractors, well, when we can get a hold of someone. We realize HUD employees are busy. Of course, of the three admins in our office, I'm probably the one that has worked with HUD the least. But I'm starting to work with HUD more and more.</p>
<p>I have a very good relationship with our HUD reps and enjoy working with them. They are supportive and very personable, too.</p>
<p>HUD is penalizing owners for events from several years ago and yet not following own procedures. This is crushing financial hardship for owners.</p>
<p>As president of the organization being surveyed, I didn't feel qualified to answer all of the questions being posed in the survey. Most of my HUD contact comes with respect to REAC inspections and recently inspections pertaining to one completed refinancing and one ongoing financing. Having stated the above, I asked specific members of our management company to participate in the survey since they work more closely and frequently with HUD representatives. Management suggests HUD should update their operating handbook with the procedures that changed in November 2008 so that there is more consistency within regions in how the account executives operate and monitor policies. It has been very frustrating to have differences in procedures related to "minimum thresholds of reserves," the "bid process minimum," and "replacement reserve deposit minimums" when procedures were supposed to be simplified and uniform. Thanks for the opportunity to comment.</p>
<p>Since the list on HUD Inspections onsite changes from year to year, it would be helpful to send out at the first of the year a new inspection requirement list so that it is a bit easier to correct if needed prior to inspections</p>
<p>... is a good leader. ... was also good but moved on. Many HUD rules are not applicable to all deals yet are enforced regardless. Timely and thoughtful responses from staff are common yet they also get stuck on irrelevant issues.</p>
<p>Some inspectors inappropriately reported conditions on site. We have appealed to the supervisors and received satisfactory results.</p>
<p>REAC inspection duplicates State housing inspection that happens 2 months later. Our loan is HUD insured and I question whether it is necessary to have this inspection as it is time consuming, a duplication of the lender's inspection and without results of the inspection given to me, not a useful management tool for. REAC inspector did not have my correct mailing address; therefore I was not aware of a planned inspection. When he made an appointment for this year, he had a list of problems from the last inspection that was not mine. Here are concerned about HUD regulations that are filtered through State lender. Annual audit is very expensive and duplication of the oversight of State lender. We are a small complex (under 40 units); however the cost is the same if we were 500 units (\$7000). This cost plus rising utilities and cost of repairs on a building that was built too cheaply will eventually cause us to fail, even though we provide excellent affordable housing for a deserving population. It was my understanding that after initial proof of income is provided at move-in that the tenant only needs to fill out a questionnaire and a certification of income every year, however lender requires a second year of proofs. Forms are complicated and tenants are signing without understanding. There is not allowance for language differences. The multitude of forms is out of control. The student form is impossible for me to understand let alone a tenant. A simple yes or no on the questionnaire should be adequate, and I believe the intentions of the original legislation have become mired in paperwork. Very few students are looking at my housing, however I have had to refuse a few applicants who are working full-time and going to school full-time and are being penalized for trying to improve their ability to increase their income.</p>
<p>The REAC property inspection is broken. The contract inspectors are not accountable for the inspections they do. My property REAC scores were not indicative of my property and the inconsistencies between inspectors and properties are a joke.</p>
<p>Couple of comments: Biggest problem I have with HUD programs. 1. Regulations/guidelines are difficult to understand. 2. Timeliness of HUD financing options versus Fannie/Freddie type was. 3. Section 8 voucher programs: Timeliness of voucher payment and # of vouchers each year</p>

varies. ...
Our group is new to HUD. I take responsibility for the headache I volunteered for. Getting the HUD insured loan will ultimately become one of the bigger mistakes I have made in my investing career. It is not that we will fail or lose too much money, it is that we will spend an incredible amount of time and money simply trying to comply with HUD rules that are cumbersome and excessive with limited purpose. HUD in no way, shape or form works on our behalf, my only experience with HUD is to be held to standards that continually change, and any attempt to contact HUD results in being told to call someone else and then ultimately getting fired. Examples: 1) The property we got the loan on is too small to absorb the costs of complying with HUD's bureaucracy. Paying the cost is one thing, having to listen to a government employee condescend to me, someone new to HUD, that HUD's past experience has shown that properties need to be more than twice the size to make this type of loan effective is somewhat irritating. If HUD knows this, a) why take the loan in the first place, b) why not have a simple one-page disclosure that explains these ridiculous costs before getting too far in the process? 2) In getting the loan, an inspection was done and HUD gave a list of repairs that had to be made in order for HUD to approve the loan. After the loan was approved, HUD required an inspection that listed a completely different set of standards that had to be met in order to maintain compliance with the loan terms. A second inspection held us to yet another standard. I realize that what I wrote probably is not what you are asking for, but it feels good to vent.
The ... HUB is great. I deal with 2 offices that report to this HUB and am always impressed with all I have contact with. The ... HUB is very good, too. The ... office is very difficult: they do not return calls, answer emails or return re-se-market rent increases take many, many months.
We are only involved with REAC inspections. We had HUD site based for many years and got out because the limitation such as being able to raise rent only \$2.00 per month over a 2 year time span completed with unbelievable paperwork.
Often, the HUD representatives spend more time evaluating financial information than necessary. HUD would be better served if a format was provided that accountants and bookkeepers must follow in the preparation of quarterly and annual financial statements. The information loaded in REAC would be consistent and require less of an effort to explain.
Too much regulations/paperwork.
We have worked with/through ... in ... . They have helped us close ... recent 223 deals. They are superb and a pleasure to work with.
Would appreciate more support from HUD for policy enforcement when dealing with a reluctant board of directors.
Just working with HUD for 5 months - has been a long, complicated process. Horrible communication and never any responses. I have tried to learn the process but it's hard with NO help and customer service.
Generally, the HUD staff and contractors we deal with are competent and helpful. The difficulties we face are: (1) Inflexible rules which hamper effective management of our HUD housing, (2) duplication of compliance (?) requirements among multiple lenders for the same project. See the efforts we were trying here in ... . HUD/CPD director participating but HUD Multifamily section says they can't because of existing statutory requirements.
Trying to enroll in the REAC program on a just refinanced property has taken over 3 1/2 hours on the customer service line and then HUD notified us we couldn't proceed any further with enrollment until we received a notice in the mail that would give us some sort of code/password-once we received this notice we needed to call back to get fully enrolled in REAC, which we have received this notice and it's been over 3 weeks! And all of this enrollment is going to enable us to receive a copy of the annual property inspection report listing any deficiencies and rating our property. Years ago it was a simple process; an inspector would visit the property, prepare a report of his findings and mail it to us. Also, when another property was recently financed no one informed us that we needed to get on HUD's AAPS program to give all the pertinent information for the

property. Even though the local HUD office received a hardcopy of all the property information at time of escrow closing, they are not allowed to input it and the lender says HUD AAPS system the HUD office said the lender was supposed to input it and the lender say HUD was to input it!! Still working trying to input the information.

Over ... unit multifamily cooperative was built by a long-time developer but was under new and inexperienced management. The developer failed to meet HUD unit sales requirements to qualify for either the construction loan or the final 40-year guaranteed loan until 4 1/2 months after building completion. To provide financial stability to the cooperative, HUD required the developer to sign a Guaranty Agreement to pay the cooperative the monthly carrying charges for the unsold units for up to a 10-year period. The developer did not comply in making the required payments and when the cooperative requested assistance from HUD to make the developer comply with the signed agreement, HUD staff took the side of the developer and never made an effort to help secure payment for the cooperative. This required a six (6) percent increase in the MCC for the members. Another separate cost the cooperative had to fund was the cost of the electricity and as these units were not sold to individuals, the real estate taxes were assessed as "Non-Homestead," which greatly increased the tax burden. The developer refused to pay these additional costs and HUD appears not to have any regulation to cover this not programmed expense. HUD also required the developer and their financial lender to sign a contract (Deferral Agreement) with the cooperative that only the proceeds from the sale of shares (units) in the cooperative could be used to pay the unpaid construction loan and the developer/agent fee. In violation of the Deferral Agreement, the developer comingled the cooperative's operating funds with the proceeds from the sale of shares. In the process, the cooperative ended up paying \$... in advertising costs for the sale of the unsold units and approximately \$... + for the salary of the developer's clerk who was handling sales. The above figures are in the ... , 2006, through ... , 2007 audit of the cooperative. During this same period, the developer arbitrarily more than doubled their management fee to total \$... for the year. The first member board was elected in ... 2007. When the newly elected Treasurer received the first completed audit, he questioned HUD if they were going to question these costs that were not in the approved HUD budget. When he asked the HUD office if they had approved a budget modification that may reflect the audited figures, he was brushed off. The lack of adequate oversight and by allowing the developer's officers and employees to function as the operating cooperative's corporate board should trigger an audit and review by the HUD office of the Inspector General. This audit/review should consider the lack of adequate comprehensive regulations on the part of HUD and also the lack of oversight in allowing a developer to perform all functions of a non-profit corporation without any effort to limit a potential conflict of interest, which is bound to arise.

Properties managed by person completing this form are HUD Financed only.

... and his staff in the ... office are very responsive and helpful. They represent HUD very well.

There is a huge amount of inconsistency in regulation and compliance direction given by HUD. In some cases, HUD has given total control to the PBCA and even if the PBCA may be wrong, HUD will support their position. The biggest struggle remains the budget approval process with the ... HUD Field office. Budget approvals are so hard to achieve for even 3 or 4 dollars. Properties end up with operating budgets that are run so tight, if one thing causes high expense(s), the sponsor ends up covering the cost and the project can't repay the sponsor, thus creating payables. The ... office has recently outlawed some repayment of payables back to the sponsor and encourages more aggressive budgeting to cover costs. ... has always fully supported our properties.

The protocols are written for apartment complexes. Our projects are mobile home parks. As such, most of the protocols don't apply. Our REAC physical inspections are severely affected as we are given zero credit for units, which greatly affects our scores, consistently giving us failing scores. Our HUD multifamily reps understand and acknowledge the problem, but refuse to do anything about it and go about the checker of boxes, which

is all they do when we ask for explanation of decisions we are quoted long handbook references and given standard generic letters with no answers. We have two appeals into REAC re physical inspections and we have not received a response. It's been 5 months. We have ... mobile home parks that we own and manage and dealing with HUD is the most frustrating, mind numbing experience. They are typical bureaucratic, unable to think for themselves and make decisions. They force us to break state laws not allowing us to do things. When you try to explain they don't want to listen and continue quoting handbook references.

Paid off loan 12/09.

Our experience with the field offices in ... , ... ... and ... have mostly been very positive. The REAC protocols pretty consist followed by the inspectors and is relatively easy to train staff to understand. The biggest concern and area of largest discrepancies is evaluating compliance with HUD regulations is from the contact administrators. I have met and discussed this issue with several other management agents and the common conclusion is that the PBCA's primary goal is to justify their existence. The better a company is in providing high quality affordable housing, the more aggressive the PBCA's become in their review of management. The result is, we are just satisfactory!

We have enjoyed working with HUD.

### C. COMMENTS FROM SECTION 202/811 OWNERS

<p>Most HUD personnel respond well, but often their hands are tied due to HUD regulations. They used to be able to make decisions that now go to Washington. They have way too much work to respond effectively. Our CAs seem so afraid of missing something in an MOR that they give findings for issues that do not exist. MORs are subjective and can be quite different from one property to the next. Not consistent. We have trouble staying in touch with our tenants due to high regulatory load.</p>
<p>Overall very satisfied with HUD and their employees. Would like to see simplification of regs and procedures to streamline processes.</p>
<p>The REAC inspectors (1) need better training, or (2) the training itself should be better, or (3) the electronic device should allow for better choices. Probably #3.</p>
<p>1) Our organization is a multi-project owner with HUD oversight rendered by several different asset managers. The lack of consistency, especially with regards to the timeliness of responses to requests for information, amongst the various individuals, is especially frustrating. 2) When calling our local HUD office, very rarely are we able to make direct contact on our first attempt with the individual who is most qualified to answer a particular question. 3) The timeframe for HUD (both in the areas of Development and Asset Management) needs to be substantially reduced. In the area of Development, it is especially frustrating to be waiting months on end for processes like Firm Commitment and Initial Closing to be completed. It has become a regular occurrence for our organization to wait three to four months for budget submissions to be approved, even after we have met the submission deadline dates. With regards to daily operations, the team that manages the TRACS system is distant at best. When one finally does speak to a TRACS representative, they are unfriendly and not very helpful at all. Rather than accept any responsibility, their strategy is to blame their colleagues in other departments within HUD or the Project owner for any delays in payments. They rarely provide any real direction towards a solution. 4) HUD personnel should be required to participate in continuing education that provides them help to reinforce that the relationship between the Owner/Sponsor and HUD is not one of "convenience." When things are going smoothly, it is "our" project. However, when issues arise, HUD distances itself from any relationship with the Owner/Sponsor. 5) The HUD handbooks are outdated and overwhelmingly complex to the daily user. Small organizations that have neither the manpower nor the financial resources to sift through the thousands of pages of documentation to precisely interpret the regulations are at risk. Additionally, the operating handbooks are not universally applicable, especially when housing is being provided under the 202 and/or the 811 program.</p>
<p>HUD ... office needs to be more friendly in the relation with owner/managing agent.</p>
<p>I am very happy with the ... HUD office personnel/knowledge and responsiveness. I am very unhappy with the ... , the contract administrator, ... is punitive and tries extremely hard to find any minor error, sometimes absolutely ridiculous. I appreciate feedback, but ... is unreasonable, negative and bureaucratic. Whereas the HUD office is helpful.</p>
<p>The people we deal with are great. But they have portfolios that are too large so they are not easily reachable for questions.</p>
<p>U.S. Department of Housing and Urban Development is a very important resource to the urban area. The... need your support and hope you continue HUD programs.</p>
<p>The support and advice Owners and Management Agents receive from HUD's ... Office is a burden. Too often, we have to address the ... Office directly because the local office is not responsive to issues and frequently make impaired judgments. Instead of collaboration and technical guidance, HUD's local decisions are irrational and unreasonable refuting (revealing?) lack of knowledge. Being Management Agent for 40 years gives us the scope of changes the ... Office has gone through to the point of promoting hardship to affordable housing projects that are superior or</p>

satisfactory, have an above 95 rate in REAC and have excellent financial statements.
This is SO HUD.
The inconsistencies in interpreting HUD policy (by HUD employees) has caused a great deal of problems for us and still continues. Problem is the sponsor (us) is always held responsible and penalized regardless.
HUD's "one size fits all" policies are inappropriate and wasteful. Section 202/8 properties are treated as if they are all open to the general public. Many are group homes, owned and operated by non-profit organizations for the exclusive use of their clientele. Under HUD rules, organizations that do not have properties open to the general public are still required to have Tenant Selection plans and applications written as though the properties are "open." Such items as rejection and/or selection notification letters must be in the plans. In many of the group homes, tenants are selected based on the non-profit organization's mission and the individual's needs, not standardized HUD criteria. Such things as rejection letters are never sent and acceptance letters are a waste of time and money, as well as being frustrating and confusing to the tenants and their guardians. Some questions required on applications can be hurtful to families and embarrassing to housing staff. Asking a parent if their child who is not capable of dressing themselves each day is planning on attending college next year is inappropriate. Requiring the expense of a background check on someone who has never been anywhere except confined to a wheelchair in their childhood home and possibly a state medical facility is a waste of time and money. Having a "pet policy" for a medically fragile group home only causes problems when one of the tenants feels they can have a pet because it is their "right" under HUD rules, when the person in the next room may be either deathly allergic to or afraid of animals. HUD needs to take a serious look at 202/8 properties and realize that properties should be categorized and perhaps have different rules for each category.
I feel the HUD does not have effective, clear, consistent communication. Resources are not provided to the local field offices and too many outside contractors are used. Policies are too cumbersome and programs are not funded fully while still more properties are built at the expense of existing housing. Compliance is overriding the mission of safe housing. HUD needs to streamline.
The REAC inspectors recently seem to have been on a personal vendetta. A recent comment from an inspector was "I am tired of all these ... inspections." They are definitely not being used as a training tool, but on a finding hunt. Some of our properties that are beautiful, well maintained properties are getting low scores; the system is broken. In ... the regulatory contractor ... has gone to a whole new level of regulatory oversight. They are creating paperwork (unnecessary) like none before. They are interpreting the 4350.3 manual in the strictest, confining ways I do not think HUD ever intended.
Very frustrating when call field office with questions and the response is short. Can't explain anything or personnel act as if they are being bothered and really do not want to help.
We primarily interact with the ... field office and the ... contractor in ...
EIV need I say more. Getting the bugs out-frustrating.
HUD personnel are sometimes hard to reach and/or get a timely response from. One instance where it was felt that staff member acted in a judgmental manner rather than a dispassionate professional.
We had a difficult time with TRACS - transmitting documents so funding could be requested to perform building maintenance and perform other required functions. This occurred over a seven-month period.
We manage a small project. Sometimes feel we could use more friendly attention and guidance. We appreciate having this project in our area and so do our tenants.
Our local HUD representative continues to try to micromanage his and our project. Most recently we were asked to further explain a \$... expense

item on our financial statements. This is ridiculous. We also continue to be asked to explain items in our financial statements that have been fully explained in prior years. Our local HUD officials appears to have no understanding of GAAP accounting rules despite the fact that our financial statements are being filed as required under GAAP. It seems as though our local HUD representative would much rather watch our project go down in flames then work with us to make it successful

?... and will be retroactive to 1 September. This is silly. If HUD is not going to pay on time, then why the big push to get gross rent increase applications in four months before the effective date? And if they have no knowledge of a gross rent change, why not implement in a timely manner which will be beneficial to everyone involved? While I appreciate the efforts of HUD to obtain feedback, I really feel that if they were sincere about this, which I doubt, they would establish a personnel forum for peer review and receive feedback directly from the people who actually do the work and implement their policies and procedures.

Notices and regulations are written in a complicated style. Please find an editor. Texts must be short, sweet and to the point. May sound irrelevant, but it will increase compliance (for sure)! Thank you.

I feel that REAC inspections no longer serve the purpose of identifying problem properties. It has taken on the role of "Let's look for a gotcha that we can deduct a lot of points for." This has tended to skew results. PCBAs are not consistent with each other, which makes it more difficult when an owner wants to standardize processes within different PCBA geographic areas. The rent increase (budget-based and OCAF) gets confusing between HUD and PCBA and lengthens the process.

The building has had problems with the windows being able to lock for as long as the building has been up. We did a physical capitol need assessment with the agreement (verbal) that after the assessment was done which cost the owner \$7,500 that HUD would make sure the problem would be corrected. As to date the windows are not fixed. And many of the problems found were not corrected. The 41 unit elderly housing d=facility was built in 1985 yet, it was 13 years later that HUD granted the first best increase and subsidy. In 2008 we were operating with the same income from rent and some subsidy from HUD as was provided in 1995. I am sorry for the late return, but this survey was sent to the former president house. The CEO just received it July 10th/

We are extremely happy with HUD's ... in ... . Also, our MOR inspector-... of ... Both are excellent educators in this school and straight shooters. We are fortunate to have them assigned to our property. Thanks to you all!!

HUD's expectations are extremely high as it relates to the physical condition of their inventory--especially multifamily that were built 30+ years ago. Mark to market ... please! Thanks for the central air ... I'm sure all the consultants, lawyers, and accountants are thanking HUD and Congress for that. That has nothing to do with preservation of affordable housing ... all the money that continues to be paid to consultants and contractors should be given to the local HUD offices. These people know the properties, know the owners and managing agents and should be funded and given authorization to make decisions without having to check with someone at a ??? or, God forbid, D.C. There was a time when we as owners and agents had a partner in HUD. It has become too adversarial and it seemed to start when Jack Kemp left the office of HUD Secretary.

Administrative requirements are unfunded and overly burdensome. It is not practical to require the same level of documentation, training and oversight for small, specialized projects (less than 20 units, state licensed, disabled population) compared to larger projects.

I believe HUD should have a category for non-profit group homes for developmentally disabled individuals. We have one group home for 6 individuals. The home is a ranch house with 6 bedrooms. HUD treats each bedroom as a unit. These are not apartment units. Just bedrooms. This house falls under the multifamily housing with all the rules and regulations. The management occupancy reviews (MOR), for example, are too much regulations and review - not necessary!

It was my pleasure to participate in a survey that is so important to the progress of housing and urban development such as HUD.
We run similar operations in four different HUBs, and I have tried to get guidance from one HUB to be accepted by other HUBs and that, in general, is impossible. The individual project managers within the same HUB can also have conflicting guidance, so I am forced to run our properties in two different states (served by the same HUB) differently.
Continuation input by ... , ... . I am ... , Executive Director of ... . My input is primarily related as multifamily housing owner, sponsor, and asset management monitor. ... is a nonprofit housing organization that either owns, sponsors, and does asset management monitoring of ... units in ... and ... which many units are under the purview of HUD ... and ... offices. The types of multifamily rental properties are HUD 202, RD 515 with Section 8, other RD 515 and 514s with USDA RD rental assistance, LIHTC, HOME. The particular issues are: 1) Of the ... HUD 202 properties, ... has encountered serious impediments from the ... HUD multifamily personnel. The HUD personnel are not cooperative, discourage ... from rectifying serious management issues that were caused by a private property management company favored by HUD personnel. This issue has deteriorated the financial and physical condition of the properties. Current reprisal is being exercised by the HUD personnel using her authority. 2) The other HUD personnel issues are more general which has impeded ... capacity to operate affordable housing in... . The HUD ... division operated out of D.C. with "out stationed" ... personnel should be evaluated. During the 8 or more years, this office with the ... in ... is totally ineffective, e.g., uncooperative, incompetent, not knowledgeable, and has never been helpful for ... housing work in ... It is recommended that HUD remove the personnel and restructure the entire ... initiative with more qualified and independent TA resource. This is now a waste of federal resources paying for the personnel in ... and ... It is recommended that experienced rural intermediary be assigned to operate the colonias initiative as have the technical personnel and loan funding resources already in place. It is also suggested that the housing TA include competent economic development personnel to leverage jobs due to the depressed impacted border economy.
The HUD REAC Inspection Procedure is patently negative and unfair. Washington does not administer the appeal process well. Appeals should be decided by a third party, not the agency that issued the report.
We have a small property, 12-apts. It's almost impossible to meet HUD's requirements.
I find extremely cumbersome for a small operation such as ours (we operate 3 6-bedroom and 1 5-bedroom group home for adults with intellectual disabilities) to have the same reporting requirements and paperwork as if we were operating a 100-unit apartment complex. I also find it hard to understand why each of the four homes mentioned above, all located within a 40-mile radius, each has a different project manager at HUD with whom we must deal.
Some of the staff and contractors are very good. The REAC system is arbitrary and difficult to use. Accessing data on the REAC system, also very hard.
Timely correspondence is a problem, an example- they sent a memo about the census which was done in March, in June. A February memo would have been better. They also write policies, send them out and then take them back, Wait till the final project is ready then send it out.
As an owner/agent doing business in many states, we are pleased to see your questions regarding inconsistencies and that you distinguish between HUD offices versus Contractors. Our greatest dissatisfaction lies in the inconsistencies that we see from one HUD office to another and even more so the inconsistencies between contractors in their oversight activities. It is difficult to know the cause of it - lack of knowledge, experience, training, leadership or something akin to a regional bias - but it's easy to see when operating in many states across the country. It is so enjoyable and productive to work with many committed, knowledgeable partners in HUD offices and HUD contractors. It is equally frustrating and puzzling to find ourselves dealing with HUD offices and contractors that seem to lack an understanding of HUD's own policies or applying

interpretations of handbooks and regulations that lie far outside the norm - again easy to see the outliers and exceptions when dealing with many HUD offices. The answer it seems would start with better training and development of staff and better communication between HUD's central office and field operations (and their contractors). The difficulties we encounter can also often be seen at the level of the individual project manager within a single HUD office. Overall we are generally satisfied with our HUD partners and contractors, however the small number of individuals or HUD offices (and contractors) who exercise oversight in an arbitrary manner overshadow our overall favorable experience with HUD because those isolated cases create administrative burdens on our company that are costly and use resources that could be better utilized. It feels at times that it is being found guilty (a wrongly placed compliance flag) until proven innocent - and again the cost of proving innocence can be significant.

For non-profit agencies that have a very small number of units, we have a rather difficult time applying new rules and regulations to our situations, specifically the EIV process. Most of the information is not even helpful to us. Also, it's been difficult finding someone to review what we've done thus far to see if we are in compliance or if there is a step we've missed.

I feel that our unit and HUD have a very rewarding relationship. HUD has been very cooperative and clear in explaining issues at hand such as: REAC unit inspection, management occupancy review, tract submission, vouchers preparation/submission, gross rent change.

Most HUD employees are very good to work with but there are one or two who shouldn't be working in public.

I can ask the HUD office anything at anytime and get good advice. I am not apprehensive to show a weak area of knowledge. ... and ... are very responsive. ... housing, a HUD contractor, is so punitive that I will not ask questions or expose an area of question. Please send out our portfolio back to HUD!! Washington is too slow.

We own and manage a ... unit residential facility for ... individuals with developmental disabilities. The paperwork involved for those ... individuals and trying to keep up with the regulations is a large and sometimes very challenging task. If we knew then, all the work involved with having HUD build this project, we would have worked to have it funded differently. There has to be a way for HUD to recognize special projects and not treat them like large rental unit projects.

REAC audit find a minor problems and make a big thing against us. Most are not true safety issues!!

The ... director of the ... Hub (...) is terrific. However, although most of her staff has been there a very long time, it has very little training or motivation. A few are vindictive. Owners pay management companies to handle the day-to-day operations of their projects. Therefore, the owners do not care much about HUD Listservs, website, or training. Owners and managers are not aware of any conferences that HUD does for affordable housing providers. The Webcast and Satellite training generally goes through published regulations but does not respond to valid questions about matters that are not included in the published regulations. Owners are not happy that HUD has begun sending them lots of things (written in HUD-speak) for signature. Since they are not sure about the ramifications of what they are being asked to agree to, they forward it to the management company. Some are concerned that HUD is trying to "trick" them. REAC physical inspections are not telling HUD what it needs to know. Tiny things get written up as though they are catastrophic. For example, a speck of paint on the decorative escutcheon of a fire sprinkler gets written up as an exigent health and safety concern, or in well-kept landscaping, one branch touching the side of a building gets written up as "overgrown or penetrating vegetation." REAC is comparable to the boy who cried wolf. MOR's done by the PBCAs are the same way. In otherwise excellent paperwork for a 100-unit project, a few tiny typos become findings and the rating slips precipitously. This obscures the overall issue of whether or not the project is being operated properly. Some long-term owners are considering opting out because of the aggravation of doing business with HUD. This is a major problem because the cost of replacing the housing is so much higher than continuing with existing housing.

<p>If takes several calls to reach REAC and you often get inconsistent answers. Technical website issues are quickly resolved but error messages are not.</p>
<p>I deal with the ... office. At times it is difficult to get in touch with the help desk, but when you do they are very helpful. At the ... office some people are very timely, others are extremely slow.</p>
<p>HUD should have training classes to keep property managers current with information. Forms are not always easy to get from HUD website. HUD should inform each type of property of the forms that must be used in each resident file and provide originals. REAC contractors should give property at least 30 days notice if inspections.</p>
<p>The asset manager, ... , out of ... does an excellent and thorough job. On the other hand we seldom hear from ... out of ... , who manages the other 50 % of our properties. Thank you.</p>
<p>This organization interacts with HUD city and county funding sources which are connected to HUD. We manage our own over 1400 units, I have been interacting with HUD for 27 years. I am well pleased with HUD. All government departments could take lessons from HUD. I am a senior officer of the corporation as well as a member of the corporation that interacts with HUD as a managing agent.</p>
<p>Our project opened in 2007. Didn't have too much support at all from local HUD office in terms of TRACS systems. We were not even aware of the IMAX changes. This financially hurt our project as monies were not received in a timely manner. The voucher query process was painful our local HUD rep could not be of assistance. The voucher processing department, not our local HUD rep was finally able to give the assistance needed.</p>
<p>The regulations for our group homes take a tremendous amount of time to complete. We have one project with 16 clients and one project with 8. The subsidies we receive are hardly worth the time we must spend. I would love to discuss this with someone. ...</p>
<p>1) Trouble asset staff are excellent in providing assistance and information. 2) Some newer staff lack history of projects due to file purging - makes for large learning curve. 3) We will miss our very qualified HUB Director who was one of the first with private - public partnership experience.</p>
<p>1) All contacts with HUD personnel in the ... office have been excellent. They are knowledgeable and provide very good assistance in avoiding and resolving problems. 2 REAC Contractors do not render the best service for HUD. They seem to have an agenda to support their work. 3) Assisted housing auditors are likewise somewhat inefficient in their efforts and reflection of correct overall project operations.</p>
<p>Some of the properties we have assumed management for were in a state of decline prior to us taking over. I think HUD who oversees these properties has to work more with the replacement management companies financially to assist in getting them back on track and operating successfully. The handbooks are important but so is real life common sense!</p>
<p>Contract Administrator competency varies. Management reviews (MOR) vary in quality, are inconsistent. Annual management reviews are too frequent and inefficient. Every other year makes more sense from a management perspective. HUD has dramatically added to the workload of managers with the EIV system requirements. Regulations change faster than it is possible to keep up with. There seems to be no consideration of the cost impact of implementing these changes.</p>
<p>I have no contact with ... All answers are for the ... field office. All my experience with ... has been to deny us building more 202 Projects.</p>
<p>We have been very dissatisfied with the PBCA that we have been dealing with. They seem to have high turnover and inadequately trained staff. To obtain a minimal rent increase or simply to renew our Section 8 contract with no rent increase, volumes of additional information is requested by them after our initial completed application is submitted, only to find out it was unnecessary. We manage over 800 HUD-subsidized units for seniors and have been doing so for more than 30 years. We have consistently followed HUD requirements for occupancy and contract renewals. The time and effort required by our staff to respond to inconsequential information requests from the PBCA for rent increases, contract renewal,</p>

and management and occupancy reviews is a huge drain on our staff and resources. We have a great track record with HUD. We are not inappropriately billing HUD for subsidy, nor are we inappropriately housing unqualified residents. Our REAC scores are consistently high. We sponsored the development of and continue to manage our properties to a very high standard. Yet, year after year, we are required to respond to and/or provide volumes and volumes of information and jump through many hoops to continue what we have been doing for 30+ years, which is manage quality properties. From a user's point of view, it appears that the PBCA is simply justifying its existence by managing inconsequential program requirements and at what cost to HUD?

One of the worst HUD programs I have had to deal with is EIV. I see tons of room for improvement here. I spend most of my time working with HUD contractor workers like ... . These people have been a huge help in every aspect of property management and compliance. I try not to bother HUD because they are so understaffed. CHFA fills in all the voids and does a great job!

The dissatisfaction at the time of this survey comes from several individuals and several issues that we are experiencing at this time. We have had on going issues in receiver response from TRACS, which is therefore limiting our fund for a new project. One individual at HUD local office took 8 months to process a HUD 9250 form. This survey may have been different if there were not so many outstanding issues at this time.

REAC inspectors are too inconsistent in their findings. We spend time researching "findings" to learn that the inspectors were incorrect. The points deducted are minimal so we "live with the score because challenging it takes too much time and effort for our small company.

This organization for many years has had ample grounds for complaint concerning the quality of work, consistency and reliability of one of HUD's subcontractors headquartered in ... We have filed complaints and grievances in the past, to which HUD has not responded or acknowledged. This ... entity seems to indulge in making up findings without evidence and misrepresenting regulations. They appear to have a quota - no one escapes having a finding, whether or not it is real. Their responses to our responses are not consistent and sometimes not even reasonable and do not reflect comprehension. Their findings, as often as not, reflect a lack knowledge of HUD regulations and requirements, take up inordinate amounts of time, and generally lower the morale of property managers. For many years, we worked with HUD senior project managers who were an asset to this facility and who could be relied upon in the event of a crisis. If the predecessor to our current project manager were still working with us, my responses to this survey would be considerably more positive. However, we currently have a project manager who, if I may be blunt, is as useful as a sieve in a sinking rowboat. Although she has been at HUD for many years, she doesn't seem to have more than basic knowledge of the requirements, the purpose of particular forms, and the procedures for their processing. I have no doubt that if there were a crisis, she could be relied upon to make it worse. I know from experience that complaining about the quality of service will not receive a useful response. One thing that has been problematic for this facility has been the "standardized requirements" for all properties. Our documentation is laden with irrelevant regulatory claptrap, which could never be applied to this facility and which the residents do not understand but must be reflected in the documentation of all HUD properties. Further, this facility serves the needs of a very specific population with a highly unique set of needs, and HUD's "requirements" ignore to the detriment of our clientele. This uniformity has also proved detrimental financially. HUD's procedures for billing - sending a voucher in advance of a month, and then having adjustments made in subsequent months - might work well for large projects. This facility has ten rent-paying units and as such this procedure of retroactive payments or refunds of subsidy often pose significant financial challenges which could be avoided under a different and more responsive system. HUD's policies and procedures do not make sense. For example, we were required to apply for an annual gross rent increase, no later than early May 2010. This rent increase was actually signed off on before 1 May and is supposed to go into effect in September. However, HUD will not allow us to make the necessary changes in TRACS/IMAX (whatever) so that we can voucher for the new, higher subsidy amount to be received 1 September. The soonest we can expect to see an increase in subsidy

payments will be in November.
HUD 202, best community partnership possible, have participated in 3 sites.
As stated before, I believe the CAs should all come together and get on the same page. Every year they want something different. For example, last year and all previous years the heading on the 9887-A stated the property name and No. CA Every spoke of this as a finding. Last year when the CA came to the property they made it a finding because it was not in the owner's name at the top of the 9887. Tell us the difference. In one CA, for years not saying anything. Mind you, different CAs came out, not the same CA! You can't imagine how floored this made me. So we changed it, but it still remained a finding. I just feel we, as HUD admins, work very hard to make our files correct and not all CAs look for the same thing. Also, why is it that some CAs contact the property with the apartment numbers of the files they are coming out to check at least 24 hours ahead (not fair) and others get the apartment numbers the morning of the day they are to go over the files? Get on the same page. Thanks for listening.
Thought our main contact was out of ... HUB office - it is not listed (question 17). While our HUD contact is personable, things (approvals) don't seem to be timely at all. We are constantly sending emails regarding open issues awaiting approval. It's a constant follow-up process to get approvals through for which we must document attempts so that ... is satisfied at MORs! It's as if we send things in for approval and don't get status updates - period.
This questionnaire does not pertain to us.
Service has vastly improved in the ... office since I first started dealing with HUD 6 years ago. Personnel are now able to answer my questions - in a very timely manner.
Turnover in HUD staff results in different interpretation of regulations. We have operated HUD properties for more than 20 years and yet a new person will radically reinterpret our role and responsibilities. If we cite the previous HUD staff's interpretation of regulations, we will be told that that person was wrong!
The ... rep for our property is great. ... finally has it together working with us. I ask that they are renewed. They really have worked hard to build a good relationship with the properties to help us, not penalize us.
In general the... office and ... office are very helpful.
I work with the HUD field office in ... which is under the ... office. We ---under the ... office, I have found over the years that the ... office is better to work with, they were helpful and understanding the ... office is much more combative and less willing to seem to help.
Inconsistencies and ease of use of the EIV system was not only extremely difficult to implement in our organization for our users but continues to be a cumbersome system to use. Frustrated by the timeliness, HUD (@ the Federal level) communicates changes/updates to their programs. Numerous examples where we receive notification from HUD in July, and the memo reflecting an effective date on the info/implementation as April 1st. Rules, regs (?), guidelines HUD implements every year are impossible for providers to keep up on. Responsiveness to our questions and concerns over the years by any HUD entity other than our local HUD field office has been a constant frustration and amazingly cumbersome throughout the years. I want to again stress that local HUD representation in ... is and has always been very supportive and helpful throughout the years.
There has been some turnover among the project managers at the HUD ... office. It seems a lot of documents get lost and then we have to re-send them causing big delays.
Some HUD contactors are excellent, give clear direction and are always available. Others not so much.

Communication is poor. The contractors seem more confused than we are and often add to the problem rather than help. The regulations are not the problem, interpretation is!

Properties in ... would be better served by the HUD ... office if the HUD Project Managers, many of whom have multiple years of experience, were allowed to make decisions and effect changes/improvements for the properties in their respective portfolios. It seems that in recent years, the ... HUD office has become increasingly inefficient and bogged down with either management indecision or management decisions that are not always in the best interest of the properties in this region. Oftentimes, it takes many months before a decision is handed down and/or a response is given to us concerning issues that really are not as complicated as the management in the ... Office make them appear. It has become increasingly frustrating waiting for decisions or corresponding three or four or five times to them about the same issue that may affect multiple properties. We are always told to respond to them within "15 days"...the same should hold true for them. Sixty to ninety days is about average for responses from that office. Primarily because letters written by the actual Project Manager cannot be signed by the Project Manager and "sit" in supervisor's offices until the supervisor can "get to them." This includes requests for withdrawals from reserve accounts and for budget approvals. The work standards in the ... office should be at the same level as that of other HUD offices and contract administrators across the country. They seem bogged down by management problems. It is apparent in our working relationships with many Project Managers in ... that they are as frustrated as we are at times. Allowing Project Managers to make more decisions might improve the situation. Another point...several Project Managers in that office have NEVER seen all of the properties in their respective portfolios because of travel/budget constrictions. That makes it more difficult to try to explain physical condition "issues" to them. They can't even envision what a property looks like...because they haven't been allowed the time/funds to make a visit. At best, they may see 2 or 3 properties a year. We have often invited them to visit but have been told that there are "no funds" allowed.

We interact with the ... HUD office for our new project. And the ...office for project program manager. We were reassigned from the ... office to ... office several years ago. We also interact with Washington, DC for EIV, TRNS and REAC.

Please note that I did not answer many of the survey questions, since in our opinion the survey questions avoided the real issues. Our most vital interactions with HUD deal with our implementation of new programs and the quest to refinance our properties. Unfortunately, many of our problems go unsolved and our paperwork gets hung up somewhere. Some of the regulations for the new programs contradict other HUD rules. If these programs were developed by the managers who deal daily with the properties, tenants and paperwork, they could be much more effective and user friendly.

I have worked as a property manager/supervisor for the past fourteen years. Working directly with HUD with all but one property. The benefit is greater to a property when it works directly with HUD rather than a third party contractor.

Of late we have had little occasion to interact with HUD. For many years we interacted with HUD on housing rehabilitation programs (owner-occupied, low-income) and HUD ... was always available, promptly responsive and provided high quality service and information. Since ... , we have only rare communication with HUD ... office, who continues to provide the highest quality services. We do not currently own or manage any multi-family housing units.

Our 202/8 does not seem to fit the mold of a typical property. We have a group home for adults who are developmentally disabled, where 7 individuals live. It is a challenge to run things as though this is an apartment building-which is how HUD seems to view it. It would be very helpful if there was someone who specialized in this type of setting that we could use a resource in how to meet the requirements. We are not a housing agency-and the way HUD regulations have evolved, meeting them has become so time consuming and confusing to us that it really doesn't make

<p>sense for anyone who is not in housing to run a HUD program. At times, HUD requirements do not jive with DSHS-DDD requirements. Our agency has also merged with another agency in the past 2 1/2 years. Trying to meet HUDs requirements to change the name of the owner has been incredibly difficult and frustrating. We have-not gotten much help in way of directions, have been given conflicting instructions received many angry phone calls and consistently receive list serves and notices late because HUD will not recognize our new address until the name is changed. Even our lawyer working on this name change has great difficulty in in process.</p>
<p>The ... HUD office is the worst office of any HUD offices. Directors come and go but the entrenched incompetency -punitive and retribution that is practiced by asset managers is disgusting - a full investigation of these people should take place- there doesn't seem to be any ability to fire them. ... and ... multifamily HUD - wonderful.</p>
<p>REAC awful!!! Never get to talk to someone--Hold forever and then disconnected. Takes forever to get a reply to phone or email, ... field office - Great!! ... in ... office is wonderful-very helpful.</p>
<p>Consistent interpretation of rules and inspection criteria is needed -across the board It is horrible.</p>
<p>Trainings that are provided never speak on behalf of group home regulations. Sometimes apply to us and not others or they apply to others and not us. It can be very confusing. I also have a problem with the auditors who are from the same agency who are not consistent. All my projects are the same but three and I can promise you I can be audited on all of them by different reviewers but same agency and provide same documentation and I will have a finding that will not be on any other review. Also, contract renewals need to have more training or just a more lengthy class rather than 1 hour at Sarah. Thank you.</p>
<p>PBCA field surveyors are not consistent in findings - vary over the state. Our understanding PBCA's were to inspect tenant files for areas where HUD was overcharged - money could be returned to Federal govt. Elderly housing in our care have not had money captured, but surveyors have consistently come up with findings in areas not related to finding money.</p>
<p>My negative responses only apply to the HUD "help desk." It is extremely frustrating to get a response from the help desk, no one calls back for weeks at a time, emails are ignored and questions are unanswered. The personnel at the Regional ... office are very helpful but are unable to provide the type of assistance required from the "help desk". The "help desk" is no way "helpful."</p>
<p>I am president of a nonprofit organization that owns a 30 year old ... unit barrier free apartment complex. My problem is we are struggling to get it upgraded. 30 years has made much of our complex out dated. When I ask HUD for suggestions it was recommended that I write grants to get needed money. Did apply for 8 grants and got \$3,000 grant. Very little help. Hired a grant writing agency, got \$0.00 even no help. As a board we are not sure what to do next as the complex meets HUD requirements but really needs up grading.</p>
<p>Reporting similar information to different agencies is rather redundant and time consuming.</p>
<p>RE: interaction with ... HUD-Timeliness of response to any issue is extremely poor. We have more than one property. Each property is assigned to an individual, different answers are given to the same questions by different people assigned to the properties. Some of the required forms are filled out differently for each property based on different information given by various people. Makes you wonder what is really "right" and will there be a compliance issue later when a new person is assigned. Very confusing! Also, most personnel I have talked to are extremely rude. There is no customer service training evident in the way they handle questions. I had to deal with a couple of Chief Counsel people in the legal department and they were courteous and very helpful, so I know that not everyone is lacking in customer service skills.</p>
<p>... is the owner of a HUD housing project and outsources the management services. Contact with HUD is primarily made between the management company and HUD. This agency receives financial reports monthly but not a report on HUD contacts.</p>

They need to understand and listen to us and just not tell us what we have to do. If they do not like someone they let you know it. We are all in this business to help people not to show how important you are to controlling all the time.
My experience with HUD 202 programs has been very satisfying. My experience with HUD - Assisted Living - not too satisfying.
The ... HUD office does an excellent job.
Consistently look for reasons why projects can't be approved. Provide no assistance in overcoming obstacles. Sole purpose seems to be centered on why new projects cannot be implemented. Too often individuals can interpret regulations and bring things to a halt. There is no effective or fair appeal process. Employees do not understand regulations and often act out of arrogant incompetence. MORS are subjective and left to the whim of individual reviewers. There have been cases where our projects have been flagged and then reversed because HUD reviewer did not understand the program requirements. Have often been asked to provide HUD employee with the appropriate reference to allow them to approve. This is a result of them not knowing their own regulations
REAC Inspections-keep inspectors local instead of from other side of the country. Waste of government \$\$ for travel. Be more reasonable with scoring.
We work with multiple HUD offices on multi funding projects. We find some HUD project teams to be very productive and others not. There does not seem to be consistency in application of the rules or flexibility in interpretation of the rules. Some teams have been great to work with and others horrid. Some are quite interested in helping you develop a successful project and others are condescending and give the sense that they want the project to fail. The intent of most of these projects is to develop homes for target population with critical needs. Some HUD offices operate as if they really understand and appreciate that and develop great customer relationships while others treat you as if you are a bother. We would encourage a stronger emphasis on success. Thanks
Most contact with HUD has been Project Mgr - ... Recently changed from owner/manager to using a service as our agent.
Inspectors need to understand regulations prior to filing their reports. "Too busy" is not good enough. Our staff then has to take hours in dealing with HUD when they never should have had to in the first place. Just because an inspector is in a rush to get to the next location, very frustrating.
My organization works with 3 different HUD asset managers and ... for 2 additional properties. I would very much like to see the 202 PRAC program contracted to ... as well.
The incompetence level with HUD employee's and all other gov't agencies is just horrible. I pray daily that this gov't agency will all crash down someday. I rarely get anyone who speaks English. I thought Congress mandated English was the language of the USA. Every day by email I get 2-4 new items from HUD that have to be addressed emailed at fly. The invasion and surveillance of seniors' lives is deplorable. On the other hand when gov't provide every kind of handout for all kinds of 2 legged aliens. Legal seniors will surely pay for their care.
Most of organizational contact with HUD is by building administrators who report to Board which I chair. I only hear about problems which are infrequent as we have a very capable administrator.
Some representatives never answer the phone or call back. Other representatives are easier to reach and call back. In the last year I have noticed that HUD staff gives a faster response. Each year REAC inspectors seem to find new a new item to focus upon. You can have an item in place for years and not have it be cited and then have it cited as a deficiency. I believe HUD should develop a more common-sense inspection system.
I do basically like the project managers as people-in person, they are better to deal with than via email or phone. I get the impression that they are doing the best they can but that in trying to objectively apply the many rules of the 811 program to our tiny group homes. Common sense goes out the window. I manage tax-credit housing and HCV residential housing, all much larger than the tiny HUD 811 homes I manage and by large spend

more of my time and energy dialing with the HUD regulations and paperwork. My HUD units are only 11% of my total units, yet the fact that the handbooks are so detailed and BIG and the paperwork is so cumbersome makes these 11% of the total units a nightmare.

We deal with only the ... field office; the reps there have been very helpful; our problem lies beyond our field office with the original written policies and the fact that HUD has absolutely no exceptions to their rule. This cost us a number of residents based on Rules that have not even a 2 or 3% occurrence; I feel there should be a HUD policy to look at individual cases in today's economy.

For ... group homes, ... bedrooms each - Each of the ... homes is a separate owner corporation. Each has ... bank accounts - operating, replacement reserve, tax and insurance and residual receipts. That's ... bank accounts for ... very small houses - ... bank accounts for a TOTAL of ... residents! I understand the principle but for our little situation, it's absurd. ... to reconcile monthly, ... statements to file, and lots of times we get charged by the bank for our fees for low balances. ... checkbooks to supply, ... deposit slip sets... . We currently have ... project managers - each with 2 of the properties. We did have ... different managers. They try to apply the rules uniformly but I have had paperwork accepted by one manager and rejected by the other when they were the same - on the basis of the fact that I did not put an item of information in the cover letter explicitly, which I had no guidance for. At least with the forms, there's a better chance that both PMs will apply the rules uniformly. I have one of the group homes for which I sought a rent increase for about 18 months - finally on the 4th try, I succeeded in getting one - by then the managing agent had contributed many thousands of dollars to the operating account just to keep the utilities paid while I submitted and resubmitted the paperwork and awaited the reply. At least one of the submissions was lost by the project manager, but they didn't tell me that until the PM had changed (reassignment) and enough time had passed to necessitate a completely new budget workup - and that was necessary every one of the four times. We could not pay the managing agent back any of the money - yet we had to use it to keep the property afloat. I have been working with HUD for most of my 9 years at this nonprofit organization which manages our HUD 811s. I am \*just now\* starting to get the requirements down in terms of understanding what is due when for each of the four properties - which operate on four different calendars since the closings were all at different times. There doesn't seem to be any way to combine these projects, which I can understand completely, and the financial penalty the owner would incur prohibits him from getting out of the HUD projects altogether - he's had an attorney look into it. Each HUD project manager comes to town early, traveling an hour each way, to review the tenant files and physically inspect the properties. It takes each of the two managers a full day to do one of the two properties they have - and they are four-bedroom group homes. They travel 2 hours in a government car and spend the entire day going through the files and the homes - I would say they average about an hour for each tenant file. They have to make a separate trip to town to do the management review each year for the other group home of ours that they manage - I've had them try to combine both in one day and just not have enough time to get both done. Mostly, I really need a resource - the rules are bad enough and seem like such overkill for our small enterprises, but I can respect them. Understanding them is a completely different matter - and if I ask one of the PMs for guidance, they refer me right to the handbook. There are several handbooks. They are hundreds of pages long. I have to look them up on HUDClips and then spend hours sifting through the chapters just to get an answer because I generally will not be given one in person, via email or over the phone. HUD seems to be very quick to be punitive but very slow to help. I have really appreciated the changes I've seen in the website over the past several years. It is becoming easier to navigate, but the rules still remain buried. There are no easy answers to which forms to submit for which purpose. When it came time for me to renew our PRAC after the first 5 years of ownership, I had no inkling it was due, much less 120 ahead of the anniversary of our closing, until the PM at the time called me during that last month prior to the anniversary and informed me that I owed paperwork and that the subsidies and contract renewal were very likely to be held up. There is no reminder - no one-page form saying, OK for this property, you need to do X by such-and-such a date, Y by such-and-such a date, and Z by such-and-such. And then there are the follow-ups - I am still trying to deal with answers to set of MOR findings while getting ready for another property's MOR and similarly with follow-

ups to AFS submissions, contract renewals, rent increase requests, etc. I desperately need some simple, ahead-of-time, non-punitive guidance instead of being referred to a 200-page handbook. Additionally, even though I invest more time and energy and frustration in these 16 units, we had to have a consultant when we were closing - we paid him tens of thousands of dollars to help us through the closings. We have a contract administrator in a different state who files our TRACs because we have no idea or manpower to do it here. I have a separate staff person (part-time) here at our nonprofit who dedicates much time and energy to 50059s, EIV, and tenant files and I (also part-time) do the financials, the leases/operating stuff, and the official correspondence with HUD. We pay CPAs each year to do our taxes on each of these corporations and to electronically file our Annual Financial Statements because that system, too, is difficult to navigate, plus each of the four corporations of course has its own set of books. Finally, we have paid consultants for one-on-one phone training for the EIV system HUD rolled out and insisted that we use - which seems like a good thing and I certainly appreciate the sensitivity of the information - but the phone training cost about \$150 and took a couple hours for myself and a staffer. And then we brought a Word document package which was a template of our policies and procedures for each of our group homes for EIV use - many, many pages which we of course had to print and file in each of our company's HUD files for use at MOR time. Honestly, tax-credit seems to work so, so much better - this (HUD 811) is such a difficult and very cost-prohibitive system in terms of consultants needed just to navigate. Thanks for doing this survey. I have faith that changes can follow.

The project officers have seemed disinterested in working with us. Only occasionally they are able to help with an issue. They often don't respond to calls or email messages in a timely manner or not at all until multiple requests are made. Upper lever management has been much better, very responsive and helpful. Unfortunately we have to suffer extended periods of bureaucratic malaise before reaching them. HUD is very "customer unfriendly" slow and inefficient a stereotypical bureaucratic quagmire that gives government a bad image.

Any people at HUD or the PBCA I have dealt with have been friendly and helpful. However, the policies, procedures and the sheer volume of regulations required to run a Section 202 property make my job impossible and frustrating. I love serving the low income elderly, but I am disgusted with the regulations and will not be continuing in housing management. Every year the regulations and requirements get more and more absurd.

I'm encouraged by the new HUD administration. While some of the bureaucracy and "cobwebs" of the past with HUD still exists, I do see movement in the right direction. I applaud the new direction along with the joint/into-agency work that is going on at the federal level, especially as relates to the sustainable communities effort.

We interact with ... HUD.

We are switching back to a conventional loan to get as far away from HUD as possible.

... HUD has been very helpful in getting us information and responding to our requests. This current team is best I have dealt with.

We are an old LMSA project 1/2 Sec 8 1/2 Market with limited staff. It is hard to keep up to date and current with HUD rules and regulations by going on line. There are too many areas to check constantly ADA, 504, EHO, IMAX-EIV-REAC handbooks etc.

In addition to one occupied Sec 202 we have one in construction. We also interact with HUD grantee seed co for housing counseling contract the interaction has been good. There is a need for additional funding through our sub grantee contract.

For several years services and relationships were excellent. In the last 4 or 5 years that has gone to hell in a hand basket.

We feel that the ... HUD office personnel are very knowledgeable and good to work with. We do get frustrated working with a contractor, ..., on Sec 8 renewals and rent increases.

HUD is very responsive to my calls. I've never had to wait anymore than 2 hours which is reasonable. ... HUD is extremely helpful and gives very

accurate advice. The staff is very supportive to owners/MA's. ... HUD contractors Admin are excellent sources for information and interpretation of HUD rules and regulations. Both Newark and Trenton have very high quality employees who really care about the properties and tenants they serve and monitor.

One question we have raised repeatedly with HUDMF program center staff is how we can turn over responsibility for the utility payments for our separately metered apartments to our residences, along with a subsidy to cover the average cost. This would create an incentive for residents to save energy and over the long term save HUD and taxpayers money. Despite repeated requests, HUD is unable to provide guidance for an issue I personally believe is a national emergency, US dependence on foreign oil and carbon emissions. We are moving forward to dramatically increase the efficiency of our buildings in the meantime, but HUD us a roadblock to making the most important change-resident behavior.

Ask some penetrating questions. If REAC inspectors (HUD contractors) come to the ... area from ... to inspect small Section 811 projects doesn't that tell someone within HUD that something is extremely wrong? Fees paid to these organizations too high!! When was the last time that the project manager from the local HUD office actually visited the project? Why does it take months to review grant submissions-sign of a sick organization.

My dealings with HUD on every level can be summed up with one word - JOKE. I have yet ever to speak to a HUD rep (including the ones that audit our facility) that has ever been of any help in any way. It has been quite to the contrary. Any dealings with a HUD rep, auditor, or inspector have simply resulted in more redundant work and confusion. You can ask one question and get three different answers. If HUD were a business, it would have gone belly up ten years ago. I can only attest to that timeline because that's how long I have been dealing with them. Their website is the worst I have ever seen. It is a cobbled mess of useless information and outdated or incorrect documents. People in the social work community actually make fun of it. I find that to be sad. The REAC, TRACS, WASS and other systems are impossible to use. HUD's own technical support people can't even navigate them, much less be of any help when a problem arises, which is pretty much every time I access one of them. I have absolutely nothing positive to say about my exposure to any of HUD's services. I greatly appreciate this opportunity for feedback since HUD doesn't have any system in place for that either. Please feel free to kick this letter upstairs as high as you can. I am just one of dozens of people in the social work field that have the same exact opinion of HUD's "services."

**D. COMMENTS FROM OWNERS OF UNSPECIFIED OR MULTIPLE PROPERTY TYPES**

HUD puts systems in place without also putting training and guidance i.e. EIV system. Then they penalize you if you aren't in compliance but unwilling to be of actual assistance. Lots of monitoring, not much actual guidance to policies and procedures put in place. Not much common sense when applying REAC points and no options for managers to rebut findings. Only "fix or be flagged" attitude. HUD doesn't take into consideration the time constraints managers are working with and often ask for unreasonable return times. Put into place new forms and processes which are time consuming and ask for duplicate data that is already on file.

We are not connected directly with FHA. Our loan is directly with HUD - subsidized housing for low income elderly. In 2007, we paid off a HUD loan for multifamily low income.

It was very difficult to get someone to put an interpretation of regulations in writing. There are inconsistencies between local HUD and third party contractors on interpretation of regulations.

HUD ... and ... -very friendly. Willing to assist in providing service to the community's needs. HUD ... staff-long term employees who clearly have old ways are allowed to implement and interpret regulation for the rent increases that do not coincide with HUD HB Chapter 7. They are rude and supervisors allow written correspondence to go out of the office in such format. They have begun conducting Management Occupancy Reviews- staff's comments during file audits and reports with finding are offensive. They should learn from the contracted PBCA who are more congenial, state the facts without implying that you are not knowledgeable particularly when reviews clearly reflect proc implemented but due to human error 1 or 2 files have an issue.

As property management, we are not able to receive REAC scores - they are sent to the owner. These scores are needed as we have financial reporting requirements - why can't we also receive REAC scores? We contact our HUD offices consistently. However, each office seems to have different priorities and different filing requirements. The rules/regulations should be the same no matter what HUD office we deal with - why is this not the case?

If it was my choice, HUD housing would be transferred to rural development.

**SURVEY QUESTIONNAIRE**





# HUD Survey of Multifamily Housing Owners

This brief, confidential survey solicits your opinion—as a spokesperson for your business or organization—of the service being provided to you by the U.S. Department of Housing and Urban Development (HUD). It is being conducted by Silber & Associates, an independent and non-partisan research organization. Please answer the questions by placing an “x” in the box of the response that comes closest to describing your experiences with HUD. If you deal with more than one HUD program, office, or employee, take all of your experiences into consideration when answering the questions. **If you are not the property owner to whom the survey was sent by Silber and Associates, but are responding on behalf of the owner, please do your best to answer all questions as that owner would answer them.**

Your responses will remain confidential. Neither you nor your business or organization will be identified in reporting the survey findings to HUD or anyone else.

Please complete the questionnaire this week and return it in the enclosed envelope. If you need assistance, please telephone Silber & Associates toll-free at 1-888-SILBER-1 (888-745-2371) or e-mail support@SAsurveys.com.

1. How **frequent** have your **business’ or organization’s contacts** been **with HUD** during the past twelve months?

Very frequent (PLEASE GO TO Question 2)  
 Somewhat frequent (PLEASE GO TO Question 2)  
 Not very frequent (PLEASE GO TO Question 2)  
 None at all → **On behalf of your business or organization, are you in a position to assess and comment on the performance of HUD’s organization and programs?**  
 Don’t know →

Yes (CONTINUE)  
 No →  
 Don’t Know →

PLEASE FORWARD TO APPROPRIATE PERSON, OR RETURN QUESTIONNAIRE IF THERE IS NO SUCH PERSON

2. During the past twelve months has your **business or organization** had **contact** with:

	Yes	No	Don't Know
a. HUD personnel in HUD’s Washington DC Headquarters office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. HUD personnel in one or more of HUD’s field offices	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. HUD personnel in a specialized HUD Center or Hub (such as Real Estate Assessment Center, Section 8 Financial Management Center, Multifamily Property Disposition Center)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. A contractor working for HUD (such as a Section 8 Performance Based Contract Administrator)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. During the past twelve months, when you interacted with HUD, were your dealings **more with HUD**, or were they **more with HUD’s contractors/third-party contractors**?  
Check “Did not deal with HUD’s contractors” if that applies.

More with HUD  
 More with HUD’s contractors  
 Interacted with HUD & HUD’s contractors about equally  
 Did not deal with HUD’s contractors  
 Don't know

4. Overall, taking everything into consideration, how satisfied or dissatisfied are you with the service provided by **HUD’s contractors/third-party contractors**?  
Check “Did not deal with HUD’s contractors” if that applies.

Very satisfied  
 Somewhat satisfied  
 Somewhat dissatisfied  
 Very dissatisfied  
 Did not deal with HUD’s contractors  
 Don't know

**Please answer the remainder of the questionnaire based on your experience with HUD, including its contractors/third-party contractors.**





