

## **KHC Conference Topics:**

### **Repetitive Compliance Review Issues:**

1. TDCS (KHC-online Tenant Data Certification System) is not maintained with current resident information.
2. Annual Certifications/Fees are not submitted by deadline submission date.
3. TDCS does not match Tenant Income Certifications (rental/subsidy amounts, utility amounts, move-in/effective dates.
4. Missing and outdated verifications for income and assets.
5. Forms with missing information and resident/management signatures/dates.

### **How KHC handles self-employment:**

1. Tax returns are requested along with the self-employment statement from the applicant. If no legal tax documents can be provided, KHC will accept a self-affidavit. The self-affidavit is used as a last resort to verify self-employment.

### **How KHC handles annuities:**

1. KHC follows the 4350.3 – chapter 5 (page 5-33).

### **VAWA (required)**

1. KHC has implemented the VAWA requirements across the board for all projects.
  - HUD 5381 – Model Emergency Transfer Plan – Posted publicly & available upon request
  - HUD 5380 - Notice of Occupancy Rights under VAWA – provided to existing tenants, applicants placed on waiting list and denied applicants; provided again with any notice of eviction or termination
  - HUD 5382 – Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking provided to existing tenants, applicants placed on waiting list and denied applicants; provided again with any notice of eviction or termination
  - HUD 5383 – Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking
  - Must utilize VAWA lease addendum describing specific protections for VAWA victims or contain VAWA language in main lease.

### **Income Averaging:**

1. KHC Multifamily Production staff oversee the decisions regarding income averaging. Staff are in the process of reviewing all guidance provided.

### **Frequency of file Audits:**

1. Initial 15-year compliance period – all projects are reviewed on a three-year rotation. More frequent reviews can be conducted for non-compliant projects. (20% of total units are

- reviewed and inspected) Risk analysis is conducted every year and all projects in the current year rotation are reviewed either by a desk or site review depending on the risk score.
2. Post-15 Year projects- Projects in their EUA period are reviewed every five years or more if needed. (20% of total units are reviewed and inspected)

### **Physical Inspections:**

#### **How KHC handles foil on burners and ovens:**

1. Best Practice - no foil allowed and if found during the inspection, management is instructed to request the foil be removed. If there's excessive grease contained in the foil, this would be state non-compliance.

#### **Blocked egress - UPCS protocol:**

1. All blocked egresses are considered LT and a finding under UPCS guidance.

#### **Trip Hazards and Housekeeping:**

1. Trip hazards are a UPCS violation and KHC follows this guidance.
2. Housekeeping Is listed as a non-reportable finding and management is responsible to ensure the finding corrected. Project House Rules generally cover this item so KHC leaves it to management to provide proof of correction.

#### **Infestations:**

1. UPCS guidance is followed. KHC does not ask staff to enter units when management/owner indicates the unit has bed bugs. To correct issues, management/owner must provide documentation from Licensed Pest Control Company showing units free and clear of all infestation.

#### **How often are units inspected:**

1. Physical Inspections are conducted per the Program Funding requirements.

#### **Expectation of vacant units:**

1. Units must be ready for occupancy upon review. In high crime areas where theft is apparent, KHC requests that units take no longer than 48 hours to make ready for occupancy.