



OFFICE OF HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

June 23, 2020

MEMORANDUM FOR: Owners and Agents of Properties Administered by Performance-Based Contract Administrators (PBCAs)  
Multifamily Regional Center and Satellite Office Directors

FROM: TOBIAS HALLIDAY / Digitally signed by TOBIAS HALLIDAY  
Date: 2020.06.23 09:27:10 -04'00'  
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Portfolio Oversight (OAMPO), HTG

SUBJECT: Status of Management and Occupancy Reviews performed  
by PBCAs

Effective May 22, 2020, HUD has lifted the suspension of Management and Occupancy Reviews (MORs) performed by PBCAs in locations where there are no restrictions by state or local law or ordinance to prevent them from doing so. This supplemental guidance additionally establishes an alternative manner in which a MOR may be conducted. Specific guidance was provided to PBCAs via email on May 22, 2020 and discussed with them via conference call on May 27, 2020. The alternative manner MOR includes the following:

- HUD will, until September 30, 2020 (or such later date as HUD may determine), allow PBCAs to conduct on-site MORs without entering resident units.
- For REAC follow-up, in determining whether EH&S and other deficiencies have been corrected, the PBCA must attempt follow-up on those affected units via contact directly with the resident by way of phone or email and document the results or attempt(s) made on the MOR report. HUD understands that this method will require cooperation from both the Owner/Agent in obtaining a contact number or email for the resident(s) and from the resident(s) when contact is made.
- A physical on-site visit to the property must still occur to document the physical conditions, general appearance, security of the property and should include a visual assessment of each building and grounds of the property but does not require an assessment of resident units.
- An on-site entrance/exit interview should occur except in instances where state or local law or ordinances prevent such meetings. In instances where these interviews are prohibited from occurring on-site, they should be conducted by telephone or email and documented as such in the MOR Report.
- Tenant file review must be completed on-site, as HUD is not authorizing the transfer, either electronically or physically, of tenant files off-site. This portion of the review can be completed without contact with management staff. The PBCA will identify the files for review in advance and those files can be selected and left in a secured location for the PBCA staff's access on-site.

- All other portions of the MOR, Desk Review, and On-site review must be completed in their entirety. This includes an on-site review of tenant files.

The PBCAs have been requested to move forward with their work plans for MORs in an effort to continue to provide oversight and monitoring of the Project Based Rental Assistance program. Owners and/or Agents will be contacted directly by their PBCA for scheduling of the MOR and the Department asks for your cooperation in arranging and completing the entrance/exit interviews and allowing the PBCA to perform the file review on-site when not prohibited by state or local law. HUD continues to encourage Owners and Agents to follow the Center for Disease Control and Prevention (CDC) guidelines and the directions given by local health officials.

We encourage Owners and Agents to continue to monitor and reference the *Coronavirus (COVID-19) Questions and Answers for Office of Multifamily Housing Stakeholders* document and distribute the *ADDRESSING TENANT CONCERNS DURING THE COVID-19 NATIONAL EMERGENCY* brochure. Both documents are available on the Multifamily Housing website at [https://www.hud.gov/program\\_offices/housing/mfh](https://www.hud.gov/program_offices/housing/mfh).

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