

MAHMA Regional Conference

Agency Update – AHSC

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Introductions



Ohio PBCA Overview

- Assisted Housing Services Corporation, an Instrumentality Entity of the Columbus Metropolitan Housing Authority, was awarded the Performance Based Contract Administration (PBCA) contract for Ohio in 2000.
- AHSC entered into a partnership agreement with CGI to administer the Section 8 Project Based PBCA initiative.
- AHSC along with CGI is also the PBCA for the District of Columbia
- The PBCA contract for Ohio administers 912 contracts with over 70,000 units in this jurisdiction.
- CGI along with our HFA/PHA partners manages PBCA initiatives in six jurisdictions including New York, Ohio, Florida, Northern California, District of Columbia, and Tennessee. These jurisdictions include more than 300,000 units of affordable housing.
- PBCA procurement updates



Overview

AHSC is dedicated to working with our owners and agents in order to pursue our shared goal of quality, affordable housing while simultaneously adhering to HUD's programmatic objectives.

To assist owners and agents with maintaining program compliance, AHSC's offers several resources:

- AHSC's website: <http://www.ahscoho.org>
- Quarterly Newsletters
- Attendance and participation in work shops



AHSC overview

Under AHSC's Annual Contributions Contract (ACC) with HUD, AHSC is responsible for 8 core tasks:

- (1) Management and Occupancy Reviews
- (2) Contract Renewals and (3) Rent Adjustments
- (4) Vouchers and Special Claims
- (5) Life Threatening & (6) Non-Life Threatening Health & Safety issues

AHSC/CGI has two Ohio offices – Columbus and Cleveland

- Local Contract Specialist – Management & Occupancy Review
- Central Contract Specialist – Contract Renewals / Rent Adjustments / Vouchers and Special Claims
- Contact Center – Life Threatening/Non-Life Threatening Health Safety issues and general tenant concerns
- Finance, Quality, and Training teams



Management and Occupancy Reviews

Main offices in Cleveland and Columbus with additional partners in Toledo and the Cincinnati area.

Conducted 477 MOR's

- 66% Satisfactory score
- 4% Superior
- 23% Above Average
- 6% Below Average
- >1% Unsatisfactory

Average days to close out – 52



Management and Occupancy Reviews

Most common items of non-compliance

- Not running EIV reports as required and/or not retaining them in a master file. These should be available for the auditor upon arrival.
- Not following up on or investigating EIV Discrepancies timely.
- Not running Existing Tenant Search Reports “prior” to move in.
 - Should be run at the final eligibility meeting
- Finalizing AR/IR certifications and submitting to TRACS without current or valid verifications.
- Calculation errors that impact TTP/Subsidy.
- Making sure all documents are signed/dated by tenant and O/A as required.



Management and Occupancy Reviews

HOTMA – Per HUD HQ Email 6/3/25, HOTMA final rule compliance date extended to 01/01/26.

- Additional HOTMA information can be found on AHSC's website - <https://www.ahscoho.org>

For owners who have adopted one or more HOTMA or other Notice H 2023-10 provisions, PBCAs will not be required to validate the accuracy of tenant rents that were calculated using some or all of HOTMA's provisions, regardless of whether the tenant rent was overridden in TRACS by the owner.

In addition, during MORs, PBCAs must issue HOTMA and Notice H 2023-10-related findings only for the following items:

1. The owner-initiated termination of assistance for a family whose assets exceeded the asset limitation at reexamination without the execution of a revised HUD Model Lease that lists noncompliance with the asset limitation as a potential reason for termination;
2. The owner's TSP and EIV Policies & Procedures were not appropriately updated or made publicly available by May 31, 2024;
3. The owner implemented HOTMA or other Notice H 2023-10 provisions for certifications with an effective date prior to January 1, 2024, or without an updated TSP and/or EIV Policies & Procedures;
4. The owner's tenant files were not annotated as described by HUD.

Management and Occupancy Reviews

- AHSC will issue a finding if the TSP and/or the EIV policy and procedures are not updated in accordance HUD Notice 2023-10
- Owners who implement HOTMA prior to the release of TRACS version 203A must annotate tenant files with the following information:
 - Which HOTMA and other Notice H 2023–10 provisions were implemented, regardless of whether they resulted in a different tenant rent than would have resulted using pre-HOTMA rules (owners are cautioned that many aspects of HOTMA are interrelated; implementation of some without others may be infeasible and/or may affect tenant rents);
 - How the family's income, assets, and mandatory deductions were determined under the implemented HOTMA provisions; and
 - If applicable, what the tenant rent would have been under the pre-HOTMA rules, and the HOTMA tenant rent amount that was entered using the “rent override” function



Risk Based MOR Scheduling

When is my next MOR?

- 6 months
 - The final rule requires a MOR within six months of a change in ownership or management.
- 12 months
 - Below Average, Unsatisfactory
 - Potentially Trouble, Trouble (regardless of MOR Score)
- 24 months
 - Satisfactory
 - Not Troubled
- 36 months
 - Above Average, Superior
 - Not Troubled



Contract Renewals & Rent Adjustments

Processed out of 2 offices – Cleveland and Columbus

- Generally – each project eligible for a Rent Adjustment (RA) annually
- Contract Renewal (CR) can take place at expiration or project can apply for early termination and new contract
- Rent adjustment types include: OCAF, Budget, Mark to comp, Mark to market

Common Delays:

- Utility Allowance (UA) Baseline Submissions
- 30 tenant notification (for rent increases and/or UA decrease)
- Owners Certification of Compliance with tenant notification
- Rent Comparability Studies (when required)

Remember submission deadlines – Due 120 days prior to expiration for a CR or 120 days prior to the anniversary date for RA

- CGI begins sending reminders two months prior to packet due date

Vouchering and Special Claims

Vouchering

- Annually process approximately 11,000 Vouchers & almost \$600M in subsidy payments
- Zero Balance vouchers – 91.6%
- Voucher due on the 10th business day of the month prior to assure timely payment
- >99% of all vouchers received are submitted to TRACS by the end of the month
- TRACS 203A

Special Claims – AHSC process 3 types of claims - vacancy, unpaid rent, and damages

- 4100 special claims processed over the past year
- Average processing/notification to owner – 13 days
- Remember:
 - 30 days to respond to request for additional information
 - 90 days to submit for payment after approval



Contact Center

Located in Columbus, Ohio

5 types of calls

- Life Threatening
 - Immediate health and safety issues that need urgent attention (gas leak, electrical hazards, lack of heat, water leaks etc.)
- Non – Life Threatening
 - Situations that do not pose an immediate risk to the health and safety of the occupants but still require attention to maintain the quality and habitability of the housing (minor plumbing, broken light fixture, broken dishwasher etc.)



Contact Center

- Resident
 - Any communication initiated by a resident to report issues, request services, or seek assistance related to their housing situation (Common area issues, clarification on housing policies rent payments, disturbances)
- Congressional
 - Inquiries or communications from members of Congress or their staff regarding issues related to HUD programs, policies, or specific constituent concerns
- Other
 - These calls can encompass a wide range of topics (general inquires, community organizations or advocacy groups, media inquires etc.)



Contact Center

Received 1570 calls in the past year

- 276 – Life Threatening
- 648 – Non – Life Threatening
- 553 – Resident
- 3 – Congressional
- 90 – Other

Call Center: PBCAContactCenter@cgifederal.com
(877) 506-3552 • TTY (800) 750-0750



Contacting AHSC

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