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CHAPTER 19

HUD REPORTING REQUIREMENTS, PHA INTERNAL MONITORING REQUIREMENTS

19.1 CHAPTER OVERVIEW

The adage “what gets measured, gets managed” is true from the perspective of both HUD and PHA managers. Through its reporting requirements, HUD tells PHAs how their performance will be measured and what standards of performance HUD expects. Similarly, PHA managers help staff understand priorities and focus on key performance issues by identifying performance measures and making it clear how close or far from the target current performance may be.

Section 1 of this chapter describes PHA responsibilities to report to HUD through the Multifamily Tenant Characteristics System (MTCS) and identifies reporting required for the Section Eight Management Assessment Program (SEMAP). These two tools are HUD’s primary mechanisms for monitoring and judging PHA performance for the housing voucher program. Section 2 recommends additional internal tracking and monitoring that can help PHAs insure that their programs are effectively managed.

Section 1: HUD Reporting Requirements

19.2 MULTIFAMILY TENANT CHARACTERISTICS SYSTEM (MTCS) REPORTING

The MTCS is the Department’s automated system for recording demographic information about assisted families and data about the units they occupy. HUD uses MTCS data to monitor and assess each PHA’s performance. It will be used to score five indicators in SEMAP and also provides documentation for budget reviews and funding decisions.

In addition, HUD’s Tenant Eligibility Verification System (TEVS), matches program participant income from MTCS with information from the Social Security Administration (SSA) and the Internal Revenue Service (IRS) to identify possible fraudulent reporting.

MTCS AN OVERVIEW

- *PHAs must submit information about all assisted families and the units they occupy.*
- *MTCS generates more than 20 standardized reports that summarize PHA operations. These reports are available to PHAs to support program monitoring.*
- *PHAs can access the data that is submitted to generate “ad hoc” reports.*
- *For a PHA to be scored under SEMAP, MTCS must receive data on at least 85 percent of the PHA’s participants.*

Electronic Transmission

PHAs must submit the data required on the Family Report form HUD-50058 to HUD electronically. PHAs with 100 units or more are required to submit data to MTCS at least once a month. PHAs with fewer than 100 units must submit data at least once a quarter. PHAs may use software provided by HUD, the Family Reporting Software (FRS), or software the PHA purchases or develops. FRS can be downloaded from the MTCS web site.

HUD requires PHAs to submit data for each of the following actions:

- Voucher issuance
- Voucher expiration
- New admission
- Annual reexamination
- Interim reexamination
- Portability move-in
- Portability move-out
- End of participation
- Other change of unit
- FSS enrollment or exit

MTCS summarizes the data received and generates standard reports. As data is received, MTCS validates each record to ensure it is in the correct format and contains required field entries. When errors are detected, MTCS transmits error notifications to the PHA. A PHA experiencing problems with transmission can post questions on the Data Transmission Forum on the MTCS web site or call the MTCS hotline.

Minimum Reporting Rate

PHAs are required to submit form HUD-50058 data for 100 percent of families enrolled in the housing choice voucher program. Prompt and complete reporting is essential. The minimum acceptable reporting rate is 85 percent. PHAs that fail to achieve the minimum reporting rate are subject to sanctions. PHA performance on five of the SEMAP indicators is verified by data provided to MTCS. A rating of zero will be assigned to these five indicators if the PHA's reporting rate falls below 85 percent.

HUD measures MTCS reporting performance as of June 30 and December 31 each year. A PHA that will not meet 85 percent reporting on those dates may submit a written request for forbearance. Forbearance requests must explain why the PHA is unable to meet the reporting mandate and identify specific steps it has taken or intends to take to improve performance. The forbearance request must also include measurable monthly goals for improving reporting performance and show that the PHA plans to meet the minimum reporting rate by the next semi-annual reporting assessment. Forbearance requests for the semi-annual reporting period in June must be received by HUD no later than August 15 of the same calendar year, and for the December reporting period by February 15 of the following year. Forbearance requests are sent to the HUD field office. PHAs who receive a forbearance but fail to meet the minimum reporting requirement by the end of the next semi-annual reporting assessment are subject to targeted review by HUD and possible reduction of administrative fees.

SUBMITTING FORBEARANCE
REQUESTS

- *For the June 30 report, submit the request by August 15 of the same year.*
- *For December 31 report, submit requests by February 15 of the following year.*

Any forbearance request after a PHA's second request must be approved by the headquarters office of Public and Assisted Housing Delivery. A PHA that does not achieve 85 percent reporting and requests an extended forbearance period must demonstrate substantial progress in reporting by achieving an improvement of at least 25 percentage points over its previous reporting rate. PHAs that fail to meet the 85 percent minimum reporting rate at the end of an assessment period will be subject to a 10 percent reduction in the on-going administrative fees for each of

the six months of that period. For example, a PHA showing a reporting rate of 82 percent at the end of June is subject to a 10 percent reduction in on-going administrative fees for each of the preceding six months. This would be true regardless of whether the PHA had achieved an 85 percent reporting rate during one or more of the five months before June.

Accessing MTCS Reports Through the Internet

PHAs can now access more than 20 standardized reports as well as form HUD-50058 raw data through the internet. The general public has access only to a summary report that provides aggregate demographic and income information about tenants in the housing choice voucher, moderate rehabilitation, public housing, and Indian housing programs.

What MTCS has to offer:

One of MTCS's most important contributions is providing PHAs and HUD with common information about the status of each PHA's program. Although MTCS does not cover all aspects of PHA operations, both parties can literally "read from the same page" and have in-depth conversations about PHA performance and progress. The standardized reports permit PHAs to identify strengths and weaknesses in their programs and provide aggregate information to the public, other service providers, and the media. MTCS has recently begun to provide historical information that will assist PHAs to identify trends in family characteristics and to track the progress of the program over time.

HUD and PHAs can generate four basic types of reports:

- (1) Summary reports which are intended to provide general information on program size and characteristics and also to highlight potential problems with program operation or compliance. For example:
 - *The Resident Characteristics report provides basic demographic information about program participants (race, ethnicity, family size, household type, household size, bedroom size, distribution of income in ranges, average tenant payment). It also reports the percentage of households for which the PHA has submitted form HUD-50058 to MTCS. The same kind of information is available for a subset of families on the *New Admissions* report and the *Families Ending Participation* report.*

- The *Key Management Indicators* report provides summary information about rents and family rent burden and also identifies potential management or compliance problems including rent calculation errors, late HQS inspections, late reexaminations, ineligible admissions, and unit size assignment errors.
 - Other summary reports provide detailed information on rent burden, mobility and portability, citizenship, and special housing types.
- (2) Detail reports provide the names and key information about families who were included as discrepancies in the summary reports, so the PHA can research and correct the discrepancies. For example, if the *Key Management Indicators* report shows that 15 percent of the PHA’s annual reexaminations are late, the PHA can request the *Late Reexaminations Discrepancy* report to obtain the names of the specific families whose reexaminations are late. (Experience has shown that some of these families are households who have left the program but for whom an end of participation report was not submitted.) By using these two reports, the PHA can correct errors and identify the actual number of families whose reexaminations are late.
- (3) FSS reports covering enrollments, enrollee progress, delinquencies, and exits from the program.
- (4) SEMAP Indicators report covering the five SEMAP indicators that can be measured through MTCS data.

The standardized reports make valuable summary information easily available. With more effort PHAs can also access and analyze form HUD-50058 raw data by making ad hoc queries. Through the “Ad Hoc Selection” on the MTCS website, a PHA can choose from a detailed listing of form HUD-50058 data fields or variables and create a customized report. Ad hoc queries and data analysis can be time consuming but may be necessary to diagnose why MTCS errors and discrepancies exist. Sometimes errors and discrepancies can be resolved only by thorough analysis of MTCS raw data.

A critical feature of the Ad Hoc Selection Menu is that PHAs can download data into common software programs, such as Excel, Access, or Lotus. By downloading and converting the data, the PHA can further sort and analyze it, correct problems, and produce additional management reports.

MTCS Resources and Technical Assistance

HUD offers a variety of tools to assist PHAs in using MTCS effectively. The primary resource is the MTCS web page. Through the MTCS home page PHAs can access:

- MTCS Web Reports Guide provides step-by-step instructions on how to access, retrieve, and print MTCS reports. It also contains detailed definitions of report data fields and error notifications.

- MTCS on-line forum permits users to pose questions directly to MTCS technical staff and other users about problems encountered in accessing and analyzing form HUD-50058 raw data and reports. MTCS staff regularly check for and respond to new questions and messages.
- News flashes and monthly updates are also posted on the website. These news flashes contain important updates or clarifications.

In addition, an MTCS help desk permits MTCS users with transmission problems to directly contact MTCS technical staff.

Section 2: PHA Internal Monitoring and Reporting

19.3 MANAGING SEMAP

HUD uses SEMAP to assess the performance of housing choice voucher programs across the country and identify those PHAs that need technical assistance. Each PHA can use SEMAP in the same manner, to assess performance in each SEMAP area and identify program functions where improved performance is required.

HUD requires PHAs to certify once each year to the performance level the PHA has achieved for each SEMAP indicator. A PHA that measures its performance monthly for each SEMAP indicator will have time to improve performance before its annual SEMAP certification is submitted.

For most indicators, a PHA can use the same approach for internal monitoring of SEMAP performance as HUD uses for scoring.

HUD uses MTCS data to score five of the indicators. A PHA can score itself on these indicators using the data available through MTCS.

For five of the remaining indicators, the PHA can adopt a sampling technique similar to the quality control sampling required for the SEMAP certification. A supervisor or a staff person who did not perform the work, but is knowledgeable about the program requirements being measured should do the sampling.

For Indicators 4 (Utility Allowance Schedule), 7 (Expanding Housing Opportunities) and 8 (Payment Standards), a review to inspect the documentation for the indicator will provide evidence that requirements have been met.

19.4 MANAGING BY THE NUMBERS

This section discusses key housing voucher activities and identifies the PHA's information needs, reporting options, and sources of information for developing effective tracking and monitoring tools for each. High quality program management involves collecting and using information for three distinct purposes: (1) tracking—knowing the status of each family and

transaction and analyzing the processing times for each step; (2) quality control—assuring that each transaction is executed completely and correctly; and (3) assessment of program effectiveness and outcomes—determining whether program policies and procedures and staff efforts result in the achievement of the PHA’s goals and quality services for its clients.

MTCS can serve as a source for some, but not all, of a PHA’s data needs. For information that is not kept in MTCS, the formats and systems used are as varied as PHA operations across the country. Some PHAs are highly automated, while others rely primarily on logs and other paper controls. The tracking and analysis formats below illustrate the uses of data and not the manner in which the information can be recorded. They are not required formats or forms. Automated databases obviously provide the PHA greater capacity for recording and analyzing data but most of the analyses recommended can also be completed manually for smaller programs.

WHY PERFORMANCE MEASUREMENT?

Effective performance measurement enables the PHA to:

- *Improve accountability of staff, customers, and contractors;*
- *Accurately assess program effectiveness and make strategic program improvements;*
- *Refine budgets and maximize scarce funding; and*
- *Share success stories with HUD and the community.*

19.5 PROCESSING TIME FRAMES

The ability to track family progress and the status of key transactions is the foundation of effective program management and good customer service. Ultimately each PHA should establish timeline goals and monitor performance against those goals. Initially, however, most PHAs can gain insights into program operations by analyzing processing times. At a minimum, PHAs should develop tracking procedures that measure the following time spans:

- Family application to selection from the waiting list;
- Initial interview to voucher issuance;
- Issuance to request for tenancy approval;
- Request for tenancy approval to lease effective date; and
- Request for inspection to completion of inspection.

The MTCS New Admissions report provides waiting times (from application to lease execution) by bedroom size, race and ethnicity.

Reports on processing time frames are often displayed in ranges as shown below, and may be reported as numbers or percentages. Automated tracking enables the PHA to report more detail, such as time frames by bedroom size or race and ethnicity.

Table A

Interview to Voucher Issuance by Number of Households		
Days	This Period	This Year
45 or less	25 (58%)	200 (60%)
46-60	13 (30%)	121 (36%)
61+ days	5 (12%)	10 (4%)
TOTAL	43	331

Table B

Voucher Issuance to Request for Tenancy Approval by Number of Households (Days)				
Race/ Ethnicity	<30	30-60	61-90	90+
White	5	28	36	2
Black	5	14	16	55
Nat. Am		1		
Asian/PI			3	
Hispanic	2	5	24	
Other				
TOTAL	12	48	79	57

Table A, above, reports the number/percentage of households that progressed from the initial interview to voucher issuance measured in increments of days.

The analysis of the timeframe from interview to issuance suggests that the length of time is increasing, and might prompt a manager to determine why this is so. The numbers could reflect either high or low performance depending upon what goals the PHA has established for this indicator.

Table B, above, reports search time using household demographics.

The analysis of the timeframe from voucher issuance to request for tenancy approval shown above indicates the search process differs by race and ethnicity. Managers should be cautious about drawing quick conclusions based upon these numbers. Although the report highlights a concern that managers should investigate, it doesn't explain the cause of the difference, which could be the result of many factors including discrimination on the part of owners, differing bedroom size requirements of the families, or the specific circumstances of particular families.

19.6 PROGRAM OUTREACH AND WAITING LIST MANAGEMENT

Each PHA may develop its own methodology for maintaining and monitoring the waiting list. Some PHAs use an automated list, while others rely upon a manual log. The minimum information needed to assess PHA compliance with waiting list include:

PHA Waiting List									
App #	App Date	Appl Name/ Address	Bedroom Size	Preference Codes	Race/ Ethnicity	Date Called	Date Ineligible/ Withdrawn	Date Voucher Issued	Date Unit Leased

Several issues related to outreach and waiting list management and the methodology for analyzing them are discussed below.

Issue #1: Are outreach efforts appropriately reaching the eligible population?

Key Indicators and Analytical Methods

- Within a reasonable margin, the demographics of families on the waiting list should mirror the demographics of the low-income population in the community. If waiting list demographics are significantly different than the eligible low-income population, the PHA may be failing to reach certain types of families.

Analysis: Compare the demographics of the waiting list (not available through MTCS) to U.S. Census or local planning data on the low-income population in the community.

- Within a reasonable margin, the demographics of program participants in each of the PHA's programs should mirror each other.

Analysis: Use the MTCS Resident Characteristics Report to compare the characteristics of families in each of the PHA's programs. Differences do not necessarily indicate fair housing non-compliance but PHAs should determine the cause where significant differences exist.

Issue # 2: Is the PHA maintaining an appropriate lease-up rate?

Key Indicators and Analytical Methods

- The target lease-up rate is at least 98 percent of units under ACC. The lease-up rate is most affected by three key variables: (1) the turnover of vouchers; (2) the success rate of voucher holders; and (3) search time required to find an acceptable unit.

Analysis of Turnover: Turnover is the number of vouchers that become available for new families because previous participants are no longer using their voucher subsidy. PHAs should record the number of vouchers that turn over each month and develop historical information that can help estimate future turnover. Because turnover is higher in some months of the year than in others, a month-by-month analysis is needed.

Analysis of Success Rates: The success rate is the percentage of all households issued a voucher who actually leases a unit. For example, if one out of every two families issued a voucher leases a unit, the success rate for the program is 50 percent. Although most software packages marketed for the housing choice voucher program do not track families between the time the applicant is drawn from the waiting list and the execution of the lease and HAP contract, PHAs can monitor success rates relatively easily by using a manual log or spreadsheet to track family progress following voucher issuance. Generally, a tracking log or spreadsheet would include some or all of the information below.

Voucher Success Rate: Searcher's Log									
Family Name	Date Voucher Issued	Extension Issued	Extension Issued	RFTA Rec'd	Inspection Passed	HAP Eff'tive Date	Date Voucher Expires	Successful	Not Successful

Analysis of Search Time: The number of vouchers that need to be issued in a given month is also affected by the expected search time. The tracking system shown above also generates the information needed to calculate search time.

Issue # 3: Is the waiting list managed effectively?

Key Indicators and Analytical Methods

- Names and contact information on the waiting list should be current enough that staff do not waste valuable time trying to contact families who are not interested or who do not qualify for the program.

Analysis: Monitor the percentage of applicants called from the waiting list who fail to respond and the percentage of applicants who respond and are determined ineligible for assistance (number of applicants withdrawn or determined ineligible divided by the number called). A sufficient number of eligible families should be available whenever vouchers become available, without a delay to determine eligibility.

DECREASE COSTS BY MONITORING LEASE-UP RATES

- Track the number of waiting list applicants who respond. If non-response is high, the waiting list information may need to be updated.
- Track the number of applicants who respond but are determined ineligible. This will enable you to estimate a "failure" rate and call in enough families to assure a sufficient number of eligible families.

Analysis: To calculate the percentage of eligible families that will successfully lease units, track the number that completes each step in the process. Determine the percentage of families scheduled for briefing that attend, the percentage of briefed families that are issued vouchers, and the percentage of issuances that result in leases and HAP contracts. The best way to monitor the steady flow of families from the waiting list is to establish a briefing schedule in advance and a simple report on the number of families briefed compared to those scheduled. Wherever there is a significant discrepancy from the plan, staff should provide an explanation. In the example below, the manager reviewing this briefings report should ask for an explanation of the low briefing figure in March and April.

PHA Report on Briefings: Briefings Planned (P) vs. Families Briefed (B)											
Jan		Feb		Mar		Apr		May		June	
P	B	P	B	P	B	P	B	P	B	P	B
30	27	30	25	30	12	30	10	30	28	30	31

Issue # 4: Are families being selected from the waiting list in conformance with PHA policy

Key Indicator and Analytical Methods

- Each family must be selected from the waiting list in conformance with PHA policy and HUD program rules.

Analysis: SEMAP requires the PHA to draw two samples: one of applicants selected from the waiting list and a second of families admitted to the voucher program. SEMAP rules specify the minimum number of files in each sample based on the number of applicants selected and the number of families leasing their first units under the voucher program. The review must ascertain whether staff have correctly documented each applicant's preference qualifications and have selected applications in the appropriate order based on the PHA's written selection policy.

19.7 INCOME AND ELIGIBILITY VERIFICATIONS AND SUBSIDY CALCULATIONS

Accurate verification of income and allowances is essential to ensure that subsidy dollars are well used. Careless verification efforts may result in under-reporting of family income or failure to provide families full credit for all allowances for which they qualify. SEMAP Indicator 3 requires a review of participant files to determine the completeness of income verifications.

Key Indicators and Analytical Methods

The MTCS *Key Management Indicators Report* identifies three types of discrepancies that affect subsidy payments. MTCS identifies:

- Households assigned a bedroom size that appears inappropriate for family size;
- Households that appear ineligible based upon income; and
- Errors in subsidy calculations based upon the income and allowance information reported.

Analysis: Discrepancies in any of these categories can be due to a lack of thoroughness in conducting the interview, inadequate verification, mathematical mistakes or data entry errors.

The SEMAP rule specifies the minimum number of participant files that must be sampled based on the number of leased units. If a PHA determines that it needs to review an additional sample to monitor accuracy throughout the year, the additional sample might be drawn as a percentage of each staff member's workload. Whatever number of transactions it reviews, the PHA should provide regular feedback to staff and should require staff to correct errors in order to improve overall accuracy rates. PHAs should also analyze errors common to all staff to determine training needs and to improve existing training efforts.

19.8 ANALYZING THE LEASING PROCESS

PHAs need to be concerned about the following processing times for the efficiency of their programs and in order to provide good customer service to owners and families:

- Voucher issuance to RTA
- RTA to inspection request
- Inspection request to inspection and approval of unit
- Lease execution to HAP contract
- Effective date of lease and HAP contract
- HAP contract execution to initial payment to owner.

When a PHA is experiencing a low rate of leasing success, a variety of information may be helpful in determining the best response to obtain improved results. Information on the vacancy rate for units in the local rental market that rent within FMR limitations is pertinent.

Information on the percent of units that pass the initial HQS inspection, the percentage that eventually pass, and the percentage that fail and are never leased under the program is also helpful. If a high rate of inspection failures is contributing to a low rate of leasing success, working to improve owners' understanding of HQS may improve searchers' success. Information on success rates for inspections is available from the leasing log described below.

In the private rental market, most owners expect to fill a unit the day after it becomes vacant to avoid losing rental income. Especially in a tight housing market, a PHA must be able to move rapidly through its leasing procedures if voucher holders are to be successful. HUD requirements also focus on the importance of prompt response. PHAs with 1250 or fewer units are required to conduct the initial inspection within 15 days after receipt of the request for inspection. Larger PHAs should strive to respond at least as quickly but are required to conduct the initial inspection within "a reasonable time" after receipt of the inspection request.

Key Indicators and Analytical Methods

- Each unit must pass the HQS inspection on or before the lease effective date.
- The lease between the owner and the tenant must be executed before the lease effective date.
- The HAP contract must be fully executed no later than 60 days after the lease effective date.

DECREASE COSTS BY MONITORING SUCCESS RATES

Follow the activities of searchers and track their success in leasing units

- *Record each request for inspection and the result of each inspection.*
- *Monitor the number of units rejected for failure to meet HQS or rent reasonableness.*
- *Use this information to determine what help searchers may need to find appropriate units and the information needs of owners participating in the program.*

Analysis: Some software systems will track some of the information required for these activities. Few, if any, will track the date the HAP contract is signed. A leasing log, maintained manually or on spreadsheet software, can track data not provided by existing systems.

Leasing Log									
a Family Name, ID #	b Date RFTA Submitted	c Initial Inspection Date	d Re- Inspection Date	e Inspection Pass Date	f Lease Effective Date	g HAP to Owner Date	h Signed HAP Returned	i HAP Executed Date	j Days from f to i

A PHA needs this data to be sure that its staff is productive and that it is providing a reasonable service to both owners and participants. A PHA that can demonstrate that it moves from request for tenancy approval to lease up in 15 days or less will find that it has many potential owners for its program.

This log will also provide information useful for analyzing factors affecting leasing success rates as described above, and facilitates coordination between the PHA staff who must work together to achieve lease-up (i.e., intake and inspections staff). In addition, it provides part of the information required when a PHA needs to analyze the adequacy of its inspections staffing and its inspections scheduling procedures.

19.9 ANNUAL HQS INSPECTION EFFECTIVENESS AND COMPLIANCE

To ensure performance in compliance with SEMAP requirements, PHAs need to monitor:

- The quality of HQS inspections;
- Enforcement of HQS standards;
- The completion of all annual inspections at least annually; and
- Abatements of housing assistance payments within required time frames.

SEMAP requires that the PHA select a sample of completed inspections and conduct quality control reinspections within three months of the initial inspection to ensure that all inspectors are correctly applying HQS standards. For SEMAP, the PHA is also required to select a sample of participant files from among all files for units that failed the annual inspection to ensure that HQS standards have been enforced.

As discussed above, the PHA should select its quality control sample to include all types of inspections (initial, annual, complaint) and a standard percentage of each inspection staff's workload. Clear feedback to staff, requirement to correct identified errors, and use of quality control results in staff performance evaluations are elements of a good quality control system.

PHAs can use MTCS data to monitor the completion of all annual inspections within 12 months of each previous inspection. A log that tracks all steps in the annual inspections process, including initial and follow-up inspections, abatement and unit approval is needed to monitor timely completion of the process. A log is essential to track the status of abatements and to document compliance with SEMAP requirements for HQS enforcement.

19.10 ANNUAL REEXAMINATIONS COMPLETION

PHAs can obtain information on the timeliness of completed reexaminations from MTCS discrepancy reports. In addition to monitoring the information MTCS reports on late reexaminations, there are benefits to requiring staff to use a reexamination log to monitor each step in the reexamination process.

Family/#	1 st Letter Date	Interview						Termination		Verifications				Date Rent Increase Letter Sent	
		Interview Date	Compl't	No-Show	2 nd Letter Date	Interview Date	No-Show	Letter Date	Effective Date	1 Date Received Sent	2 Date Received Sent	3 Date Received Sent	4 Date Received Sent		

When completing reexaminations, staff must use time management techniques to keep track of numerous transactions for each family and manage several months of re-examinations simultaneously. If the PHA keeps a log day to day, it is easy for staff and supervisors to see exactly what has been completed and what needs priority attention in order to meet reexamination deadlines.

19.11 MONTHLY REPORTING

Information obtained from MTCS and the PHA’s own monitoring and quality control systems should be summarized and included in regular reports provided to managers, executive staff and commissioners. Key program management data should be reviewed on a monthly basis. Managers need detailed information; commissioners require only summary information. Organizing data to show your SEMAP score based on performance at the end of the month and cumulatively for the fiscal year is a good way to discuss monthly reports. Use of the SEMAP certification form for monthly reporting may focus staff on areas needing improvement.