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RBD FASTFACTS -
ANNUAL
RECERTIFICATION
BILLING

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ROSS BUSINESS DEVELOPMENT, INC
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FASTFacts
Annual Recertification Billing

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Disclaimer

The material contained in this document is not comprehensive of the continually emerging issues surrounding policies in The Multifamily Housing industry. In addition, the handbook guidance is derived from The HUD Handbook 4350.3 Rev 1 Change 4 released in August 2013 and in December 2013 and subsequent notices and memos from HUD.

These materials were updated 1/2021.

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INTRODUCTION

The following summary is provided so that owner/agents and CAs understand when subsidy should be provided. There are many variables that may affect the timeliness of completion of the AR. We will provide five common situations in an attempt to show when and what type of certifications are required.

- Example 1 – Perfect World
- Example 2 – After Cutoff and before Effective Date
- Example 3 – Reports After Effective Date
- Example 4 – Extenuating Circumstances

This is in an attempt to ensure consistency for all residents.

Please note that **Example 2 and Example 3** are examples of delays caused by the resident.

When **delays are caused by the owner/agent**, the AR date does not change. When creating the voucher for the 16th month (or earlier) the owner/agent must submit either the AR, or a TM or a MO (*effective before the anticipated AR date*).

In cases of delays caused by the owner/agent, if Tenant Rent increases, the resident is entitled to a 30-day notice of rent increase and the owner/agent may not require the resident to pay the new rent until the first of the month after the thirty-days.

In order to continue to receive housing assistance, residents are required to report income information at least once, every year.

Residents are given 12 months, from the first of the Effective Date month of the last MI/IC or the last AR, to meet with the property staff and provide the documentation necessary to determine the assistance payment for the upcoming year.

The Annual Certification Process is described in HH 4350.3 R1, C4, Paragraphs 7-6 and 7-7. Figure 7-3 provides a list of steps.

Please note that some properties have requested and been given permission to conduct all Annual Certifications at the same time. This may be true for an entire contract or for specific units/buildings within a property. Residents are advised of their requirement to report at Move-in/IC and at each AR when they receive the Initial Notice of Certification.

At least 120 days prior to the anticipated AR Effective Date, owner/agents are required to provide residents with the First Reminder Notice.

If the resident has not completed the certification, a Second Reminder Notice should be sent at least 90 days before the anticipated AR Effective Date.

If the resident has not completed the certification, a Third Reminder Notice should be sent at least 60 days before the anticipated AR Effective Date. This is the first time the owner/agent reminds the residents that their assistance will be terminated if they do not comply. See HUD's 60-day Reminder Notice.

Usually, site software is used to produce these reminder notices. Copies of all notices must be included in the resident file.

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Example 1: When a resident reports in a timely manner, all of their information is received no later than the 10th day of the 11th month of the certification cycle. The owner/agent should have plenty of time to prepare the AR and create the Initial Notice for the next year. The owner/agent will also have time to create the 30-day notice of rent increase if necessary. All adult household members must sign and date the certification and the owner/agent must sign and date the certification before it is transmitted to the CA or HUD. Signature dates do not have to match. See the example below:

Example 1: Using March 1 as the AR effective date Resident Reports in a Timely Manner – No Extenuating Circumstances (Perfect World)

Date	Milestone	Tasks
March 1	Beginning of Certification Cycle	Certification is complete, signed and dated. OA provides Initial Notice.
April, May, June, July, August, September, October – no required action		
November 1	120-Day Reminder Notice	It is good (<i>but not required</i>) if this reminder notice includes an AR Questionnaire and a list of documents necessary to complete the AR. Meet with residents, review EIV reports and verify information
December 1	90-Day Reminder Notice	If certification is not complete and signed, send second reminder notice. Meet with residents, review EIV reports and verify information
December 10	Resident Meets with Property Manager & provides required information	Owner/agent successfully verifies information
January 1	60-Day Reminder Notice	If certification is not complete and signed, send third reminder notice.
January 10	<i>Cutoff Date</i>	All documentation has been submitted and verified
January 29	Determine new rent and send notice	If rent increase, send a 30-day notice. <i>Note: Should the owner/agent fail to complete the verification process in time to give the tenant a 30-day advance notice of a rent increase, the tenant will not be required to pay the increased rent until the 30-day rent increase notice period has expired. The HAP change and the AR will be effective on the recertification anniversary date.</i>
January 30	Resident(s) signs 50059	Certification is complete, signed and dated. OA provides Initial Notice.
February 10	March voucher is due.	AR is transmitted and the new AP is reflected on the March voucher. <i>Note: The AR may be transmitted at any time after it is complete but it must be transmitted before the new AP appears on the March voucher.</i>

Specifically, in this scenario, when the resident reported in a timely manner and the AR is complete before the AR effective date – specific signature rules apply. If the certification is complete, but all adult household members have not signed by the anticipated effective date (*certification is complete and ready to be signed but delay caused by the resident*), the certification is late and the household is subject to termination as long as all AR notices have been provided to the tenant. See HUD’s Handbook Questions and Answers document which can be found on HUD’s RHIP web site.

107. *Question: Chapter 7, Paragraph 7-6 B states that "owners and tenants must complete the applicable steps listed in Chapter 7, Figure 7-3 for an annual recertification to be timely." Would a tenant cause a recertification*

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to be late if he/she failed to provide required signatures on the HUD-50059 (step 8) by the recertification anniversary date?

Answer: Yes. A tenant would have caused a certification to be late if he/she failed to provide required signatures on the HUD-50059 by the recertification anniversary date.

OAs may not terminate subsidy if the resident completes the certification, including providing tenant signatures, before the anticipated effective date of the new certification. The exception is when the assistance payment calculation results in zero AP.

DELAYS IN PROCESSING DUE TO LATE TENANT RESPONSE

The AR process starts getting tricky when residents do not respond in a timely manner. When reviewing HH 4350.3 R1, C4, Paragraph 7-8, HUD provides the following instruction:

a. This situation can occur as follows:

- 1) *The owner provides all three certification reminder notices in accordance with HUD requirements; and*
- 2) *The tenant reports for the certification interview and provides information and signatures after the cutoff date (i.e., after the 10th day of the 11th month following the last annual certification), but before the certification anniversary date.*

b. The owner processes the annual certification.

- 1) *Changes in the TTP/tenant rent and assistance payment take effect on the certification anniversary date.*
- 2) *As established in the Model Lease, the third reminder notice fulfills the requirement for a 30-day notice of rent increase effective on the anniversary date.*

c. In all cases where the tenant reports for certification after the 10th day of the 11th month after the last annual certification but before the certification anniversary date (as described in subparagraph D-2 a above), all adjustments in assistance payments and the tenant's rent are made retroactive to the certification anniversary date.

HUD also provides owner/agents with additional time to process the certification in this situation. See HH 4350.3 R1, C4 Paragraph 7-6.

7-6 Overview of Annual Recertification Procedures

It is the owner's responsibility to process all recertifications in a timely manner. HUD Headquarters will terminate a certification if a new recertification is not submitted within 15 months of the previous year's recertification anniversary date.

HUD has instructed Contract Administrators to terminate assistance payments to an owner if a new annual recertification has not been completed and submitted through TRACS within 15 months after the previous year's anniversary date.

Owners must repay, by making an adjustment to the voucher, the assistance collected for the 3-month period from the date the annual recertification should have been effective through the end of the 15th month when assistance was terminated. Once the new certification is processed, owners must follow the guidance in paragraph 7-8 for determining the effective date for changes in the TTP, tenant rent and assistance payment when the recertification is delayed.

A. Owners and tenants must complete the applicable steps listed in Figure 7-3.

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- B. *Owners must maintain a tracking system to facilitate timely completion of recertifications.*
- C. *To enable owners to give the tenant the required 30-day advance notice of any increase in the TTP or tenant rent, Steps 1 through 6 in Figure 7-3 should be completed at least 35 days before the recertification anniversary date.*

Note: HUD does not have set rules regarding signature dates in this situation. Owner/agents should develop a policy to ensure consistency.

For example, an owner/agent may want to establish a policy that specifies that adult household members will have until the later of the anticipated AR date or ten (10) business days from the date the resident is notified that a certification is ready for signature, to sign the certification or face termination of assistance.

In the scenario above, if the certification is completed by the OA no less than 10 days before the anticipated effective date of the AR, then the resident should have ample time to sign the certification before the effective date.

If TRACS receives no submission for that household, TRACS will create an HQ Termination 90 days after the anticipated effective date of the AR. If the AR is complete, the new rent/new assistance payment is effective on the original anticipated AR date.

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Below is an example of a resident who reports after the 10th day of the 11th month but before the certification effective date.

Example Using March 1 as the AR effective date Resident Reports after Cutoff Date, but Before AR Anniversary Date

Date	Milestone	Tasks
March 1	Beginning of Certification Cycle	Certification is complete, signed and dated. OA provides Initial Notice.
April, May, June, July, August, September, October – no required action		
November 1	120-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
December 1	90-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
January 1	60-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
January 10	Cutoff Date	Deadline for meeting and all information to be submitted. Resident does not respond, or has not provided necessary documents/signatures
February 10	March voucher is due. March is 13 th month	In this example, residents have not provided property staff with all necessary information. Include previous AP amount on voucher.
February 15		Resident provides all documentation to complete the cert and OA is now required to verify. Certification cannot be complete by 2/28. OA should process the certification as quickly as possible, but has until the 16 th month voucher is submitted to complete the certification process. By the 16 th month, the OA must submit an AR, TM (<i>when AP=\$0.00 except for PRAC & S8 RAD CI PH</i>), or MO to HUD. OA should be able to complete cert before 5/10 (when June voucher is transmitted – June is the 16 th month)
February 28		Generally, cert must be complete and signed by all household members. <u>As long as all household members met with the OA and provided required documentation, OA may continue to process the certification.</u>
March 1		This is month 13
March 10	April voucher is due. Billing for month 14	If possible, complete cert; cert will be included on April voucher if it was not included on the March voucher. If new AR will be included on April voucher check adjustments to make sure subsidy for March was adjusted to reflect the correct AP. If AR is not complete and signed, bill for previous amount
April 1		This is month 14
April 10	May voucher is due. Billing for month 15 Certification is complete and signed and included on May voucher	AR signed by adult household members. Check voucher adjustments back to 3/1. OA provides initial notice. If Tenant Rent (TR) changes, new amount is retroactive to 3/1 as long as 60-day Reminder Notice was provided. <u>If OA sent 60-day reminder notice</u> , resident is not entitled to 30-day Notice if TR increases.

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Failure to Recertify in a Timely Manner – No Extenuating Circumstances

Technically, a resident has until the day prior to the anticipated AR Effective Date to provide the owner/agent with the required information. See Paragraph 7-8 of HH 4350.3 below:

Tenant responds after recertification anniversary date. Tenant is out of compliance.

a. *This situation occurs when:*

- 1) *The owner provides all three recertification reminder notices per HUD requirements; and*
- 2) *The tenant reports for the recertification interview on or after the recertification anniversary date.*

b. *On the recertification anniversary date, the tenant must begin paying the market rent.*

NOTE: *In a Section 202 PRAC or Section 811 PRAC project the tenant will be evicted for failing to comply with the recertification requirements. The tenant will pay the greater of operating rent or 30% of income until eviction procedures are completed.*

NOTE: *In a Section 236 project, the tenant must pay the Section 236 market rent. In a BMIR project, the tenant must pay the BMIR market rent.*

c. *Assistance should be reinstated if:*

- 1) *Assistance is available at the property;*
- 2) *The tenant submits the required information; and*
- 3) *The owner determines that the tenant qualifies for assistance.*

d. *The new TTP/tenant rent and assistance payment take effect the first day of the month following the date on which the tenant reported for the certification. The tenant must pay the market rent until this date. If the tenant fails to report for the recertification interview and fails to pay market rent, or make arrangements to pay, the owner is obligated to evict for nonpayment.*

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Example 3: Using March 1 as the AR effective date
Resident Responds on or After AR Anniversary Date – No Extenuating Circumstance

Date	Milestone	Tasks
March 1	Beginning of Certification Cycle	Certification is complete, signed and dated. OA provides Initial Notice.
April, May, June, July, August, September, October – no required action		
November 1	120-Day Reminder Notice	Resident does not respond, or has not provided necessary documents (and signatures as applicable)
December 1	90-Day Reminder Notice	Resident does not respond, or has not provided necessary documents (and signatures as applicable)
January 1	60-Day Reminder Notice	Resident does not respond, or has not provided necessary documents (and signatures as applicable)
January 10	Cutoff Date	Deadline for meeting and all information to be submitted. Resident does not respond, or has not provided necessary documents (and signatures as applicable)
February 10	March voucher is due.	Resident does not respond, or has not provided necessary documents/signatures – No Extenuating Circumstances
February 28	<u>Under most circumstances, if household members fail to meet and provide required information and signatures by this date, household assistance MUST be terminated unless there are extenuating circumstances. Different rules apply if resident reported after the 10th day of the 11th month but before the AR anniversary date or if extenuating circumstances exist.</u>	
March 1	Complete TM transaction effective 2/28. Tenant Rent is calculated with \$0.00 assistance. Resident must pay market rent. If resident does not pay market rent and if resident does not report for certification, OA must terminate tenancy. If this is a PRAC property, The OA must begin process to terminate tenancy.	
March 10	April voucher is due.	In this case, do not bill for subsidy for this resident. If household did not report, OA MUST Terminate effective 2/28 (see Note about PRAC above). Send TM. Check voucher to make sure adjustments return subsidy for March.
March 15	Residents report for certification.	If resident reports, complete Initial Certification effective April 1, and send notice of requirement to sign. Resident signs and OA provide initial notice. Next AR Date is April 1. See HH 4350.3 R1, Paragraph 7-8
April 10	May voucher is due.	IC will be included on May voucher. Check voucher adjustments to make sure subsidy was adjusted to reflect correct AP starting 4/1

EXTENUATING CIRCUMSTANCES

While failure to report for the AR meeting appears to be a clear case of non-compliance, HUD requires owner/agents to determine the facts surrounding a resident's failure to respond. If a resident fails to participate in the AR process, the OA must ask the resident if there are extenuating circumstances preventing completion of the certification. See HH 4350.3 R1, C4, Paragraph 7-8.

*Extenuating circumstances when tenant is out of compliance. When a tenant fails to provide the required recertification information by the recertification anniversary date, an owner **must** inquire whether extenuating circumstances prevented the tenant from responding prior to the anniversary date.*

If the tenant is a person with disabilities, the owner must consider extenuating circumstances when this would be required as a matter of reasonable accommodation.

a. *Extenuating circumstances. These are circumstances beyond the tenant's control. Examples of extenuating circumstances include, but are not limited to:*

- 1) *Hospitalization of the tenant.*
- 2) *Tenant out of town for a family emergency (such as the death or severe illness of a close family member).*
- 3) *Tenant on military duty overseas.*

b. *Inquiring about extenuating circumstances.*

1. *At the time the tenant submits the required recertification information, the owner must inquire whether extenuating circumstances prevented the tenant from submitting the information prior to the recertification anniversary date.*
2. *If the tenant indicates that extenuating circumstances were present, the tenant must promptly provide the owner with evidence of their presence.*

c. *Determining whether extenuating circumstances were present. When a tenant provides evidence of extenuating circumstances, the owner must determine whether the information provided shows that the circumstances meet the condition described above in subparagraph a.*

d. *Notice of decision. The owner must provide the tenant with a written notice of the decision. The notice must also inform the tenant of his/her right to appeal the owner's decision if the owner determines that extenuating circumstances were not present.*

e. *Appeal to the owner. If the owner denies extenuating circumstances, he or she must provide the tenant with an opportunity, within 10 days of notification, to meet with the owner or designated representative to appeal the decision to raise the tenant rent to market rent. The owner has an obligation to arrange for a person, who was not part of the original determination, to conduct the appeal meeting. The tenant may have representation at the meeting, may present information for consideration, and may respond to the information presented by others.*

f. *Extenuating circumstances NOT present. If the owner determines that extenuating circumstances were not present, follow the procedures in subparagraph D.3 above for completing processing of the tenant's information, determining whether assistance can be reinstated, and establishing effective dates.*

Effective date of TTP/tenant rent, assistance, recertification anniversary when extenuating circumstances were present. If the owner determines that extenuating circumstances were present:

- a. *There is no change in the recertification anniversary date; and*

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b. The TTP/tenant rent and the assistance payments determined based on the recertification information provided by the tenant are effective retroactively to the recertification anniversary date.

EXTENUATING CIRCUMSTANCES CODE (FORMERLY TENANT UNABLE TO SIGN INDICATOR)

For years, owner/agents have had permission to submit certifications without resident signatures if certain extenuating circumstances exist.

Note: This is not the same as refusal to sign.

If there is a situation when the OA cannot complete the AR process or the resident is unable to sign, as in the case of a resident who has been hospitalized and/or is in rehab or when a member of the household is enlisted in the military and has been deployed to active duty overseas, the certification can be submitted provisionally with the Extenuating Circumstances Code in lieu of a resident signature. It is important that owner/agents follow HUD guidance when documenting the tenant file. HH 4350.3 R1, C4, provides the following instruction:

“... The owner may consider extenuating circumstances when an adult family member is not available to sign the HUD-50059, for example, an adult serving in the military, students away at college, adults who are hospitalized for an extended period of time, or a family member who is permanently confined to a nursing home or hospital. In these instances, the owner must document the file why the signature(s) was not obtained and, if applicable, when the signature(s) will be obtained. The owner must provide the tenant a copy of the signed HUD-50059 and retain a copy in the tenant’s file.”

Legitimate reasons to submit a 50059 without a tenant signature are outlined in HUD’s MAT Guide Chapter 5.

Item 118	Extenuating Circumstances Code	
		Leave blank if any tenant has signed this (re)certification. If the tenant has not signed this (re)certification, this Item must be filled in with one of the following codes. 1 = Medical 2 = Late annual (re)certification due to accommodation or extenuating circumstances. 3 = Late annual (re)certification due to owner/agent delay 4 = Late annual (re)certification due to third party delay (For example a Guardian) 5 = Military Deployment 6 = Eviction in Progress. Must be for a valid HUD Handbook reason. 7 = Court order 8 = No Signature Required (Retroactive GR done after a MO or a GR correction to a previously transmitted 50059 where the only change is the GR modification of the contract rent and where none of the TTP, Tenant Rent, or Utility Allowance changes). See 202D MAT Guide 9 = No signature required for 60 days (based on anticipated voucher reported on date). An example would be a retroactive GR causing a correction to a previously transmitted 50059 and where any of the TTP, Tenant Rent or Utility Allowance changes. A signature is required but the cert may be transmitted immediately and the signature collected within 60 days. 10 = Other 11 = RAD tenant not required to or unable to sign.

When a resident does not report for AR or does not sign the appropriate certifications, it is not usually appropriate to use the Extenuating Circumstances Code unless there really are extenuating circumstances or unless the owner/agent is making a reasonable accommodation.

This code is not used because a resident was on vacation or because a resident refused to participate.

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BE CAREFUL ABOUT USING THE EXTENUATING CIRCUMSTANCES CODES.

OWNER/AGENTS MUST BE FAMILIAR WITH

LOCAL TENANT/LANDLORD RULES WHEN REQUESTING SUBSIDY ON BEHALF OF A
RESIDENT.

Example Using March 1 as the AR effective date Resident Has Been Hospitalized – Delay Processing Due to Extenuating Circumstance Wait for 15th Month Voucher

Date	Milestone	Tasks
March 1	Beginning of Certification Cycle	Certification is complete, signed and dated. OA provides Initial Notice.
April, May, June, July, August, September, October – no required action		
November 1	120-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
December 1	90-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
January 1	60-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
January 5	Resident contacts site staff and indicates extenuating circumstance	Explains that he/she is in the hospital and cannot complete the certification. OA will use available information to create certification and may use Extenuating Circumstance Code in lieu of tenant signature.
January 10	Cutoff Date	Deadline for meeting and all information to be submitted. This meeting requirement is waived when there is an extenuating circumstance.
February 10	March voucher is due. March is 13 th month	In this example, resident has indicated that there are extenuating circumstances. Include previous AP amount on voucher.
March 1	This is month 13	
March 10	April voucher is due. Billing for month 14	In this example, resident has indicated that there are extenuating circumstances. Include previous AP amount on voucher.
April 1	This is month 14	
April 10	May voucher is due. Billing for month 15.	In this example, resident has indicated that there are extenuating circumstances. Include previous AP amount on voucher.
May 1	This is month 15	
May 10	June voucher is due. Vouchering for the 16th month if AR is not complete	Owner has already billed for 15 months under the old AR and may not bill for month 16 without a new AR. Paperwork is not complete due to extenuating circumstances. OA submits AR effective 3/1 and use appropriate Extenuating Circumstance Code. CA may not create the AR transaction on behalf of OA. CA may not create TM on behalf of OA. CA may not continue to pay AP for this tenant unless AR is submitted

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May 15	Resident Returns	OA completes necessary steps to verify and complete certification. Correct AR if necessary. Remove Extenuating Circumstance Code. All adult household members sign. Provide Initial Notice.
June 10	July voucher is due	New AR will be included on July voucher. If AP changes, check adjustments to make sure they are correct based on March 1 effective date.

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Billing Through the 15th Voucher Month

Note: Site software will continue to bill for subsidy through the 15th voucher month when no AR, TM or MO is completed by the anticipated AR effective date. This happens when:

- When the resident meets with the OA and provides all required documents before the AR effective date; or
- When there are extenuating circumstances; or
- When the owner/agent does not complete the AR steps as required

In all of these cases, before billing for the 16th month the OA must submit either:

- An AR using the original anticipated effective date; or
- A TM Termination effective the day before the anticipated AR effective date; or
- A MO effective before the anticipated AR date

Note: The above is just one example of how the AR may be submitted using the Extenuating Circumstance Code.

Owner/agents are not required to wait until the 16th billing month to send the AR using the Extenuating Circumstance Code.

In response to the COVID-19 pandemic of 2020, many owner/agents used an alternative method for submission as shown in the next example. In this example, the OA did not wait until it was time to submit the 16th month voucher.

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Example 5: Using June 1 as the AR effective date
Response to National Disaster – Delay Processing Due to Extenuating Circumstance
Do Not Wait for 15th Month Voucher

Date	Milestone	Tasks
June 1	Beginning of Certification Cycle	Certification is complete, signed and dated. OA provides Initial Notice.
July, August, September, October, November, December, January – no required action		
February 1	120-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
March 1	90-Day Reminder Notice	Resident does not respond, or has not provided necessary documents/signatures
March 15	Due to National Disaster, OA uses any available information to prepare certification	All information cannot be verified and resident is unable to report to provide required signatures. Extenuating Circumstance Code is used in lieu of tenant signature.
April 1	60-Day Reminder Notice or other like notice provided to resident	OAs inform residents of AR requirements, new rent and that any corrections will be effective as of the original AR date.
April 10	Cutoff Date	Deadline for meeting and all information to be submitted. This meeting requirement is waived when there is an extenuating circumstance.
May 10	June voucher is due. June is 13 th month	OA submits the certification using the Extenuating Circumstance Code. New AP determined on cert submitted using the Extenuating Circumstance Code is reflected on the voucher
June 1	This is month 13	
June 10	July voucher is due.	New AP determined on cert submitted using the Extenuating Circumstance Code is reflected on the voucher
June 15	Pandemic Shelter in Place order ends	OA completes necessary steps to verify and complete certification. Correct AR if necessary. Remove Extenuating Circumstance Code. All adult household members sign. Provide Initial Notice.
July 10	August voucher is due	New AR will be included on August voucher. If AP changes, check adjustments to make sure they are correct based on June 1 effective date.