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HUD MOR CHECKLIST

How to Prepare for a Management and Occupancy Review

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A Management and Occupancy Review (MOR) should never feel like a surprise inspection. For well-run HUD-assisted properties, it is an opportunity to demonstrate that the property’s day-to-day practices, resident files, policies, financial controls, and fair housing procedures match HUD requirements. The key is to prepare before the reviewer arrives - not after findings are issued.

THE GOAL: Make the reviewer’s job easy. Your documentation should tell a clear, consistent story from policy to file to system record.

What Is a HUD MOR?

HUD uses the Management and Occupancy Review process to evaluate an owner/agent’s operating policies, procedures, and practices for multifamily housing. Form HUD-9834 is the central management review form, and HUD’s current handbook page identifies Chapter 6 of Handbook 4350.1 and the HUD-9834 materials as core MOR resources. *[HUD Handbook 4350.1; Form HUD-9834]*

A strong MOR result is built long before the scheduled review. The most effective preparation combines a management-level review of policies and records with a file-level pre-audit that tests whether staff are actually following those policies.

The HCA Pre-MOR Strategy: Review the Property in 7 Layers

1. Management Documents & Required Policies

☐ Current management agreement and management certifications

☐ Tenant Selection Plan and occupancy policies

☐ EIV policies and procedures, including security documentation

☐ VAWA policies, notices, forms, and emergency transfer procedures

☐ Reasonable accommodation / modification procedures

☐ Affirmative Fair Housing Marketing Plan and supporting marketing records

☐ House rules, pet rules, grievance/complaint procedures, and resident notices

☐ Current utility allowance documentation, rent schedules, and applicable approvals

2. Resident Eligibility & Tenant Files

☐ Move-in eligibility and income limits

☐ Annual and interim recertifications completed and documented timely

☐ Income, asset, deduction, and household composition verifications

☐ Correct calculation of tenant rent and assistance

☐ Signed leases, addenda, HUD forms, and required notices

☐ EIV reports and required follow-up documentation

☐ Citizenship/eligible immigration status documentation when applicable

☐ Student eligibility, live-in aide, and other special household circumstances

☐ Repayment agreements, retroactive corrections, and supporting documentation

3. Waiting List, Applications & Tenant Selection

☐ Waiting list is current, organized, and auditable

☐ Selections follow the Tenant Selection Plan

☐ Preferences are documented and applied consistently

☐ Application disposition, rejection, withdrawal, and no-response records are retained

☐ Applicant screening and rejection practices are consistent with policy and fair housing requirements

☐ Accessible-unit and transfer practices are documented

4. EIV & Enterprise Income Verification Controls

☐ Current EIV access authorizations and security documentation

☐ Required EIV reports are generated, reviewed, and resolved

☐ Income discrepancies are researched and documented

☐ Existing Tenant Search is used at required points

☐ Failed verification attempts and alternative verification methods are documented

☐ EIV information is protected from unauthorized access

5. Fair Housing, Section 504 & Accessibility

☐ Required fair housing posters and notices are displayed

☐ Reasonable accommodation requests and outcomes are documented

☐ Accessible units and mobility/hearing/vision features are tracked

☐ Section 504-related records are organized for review where applicable

☐ Marketing and outreach records support the approved AFHMP

☐ Staff can explain how complaints are received, escalated, and resolved

6. Property Operations & Physical Readiness

☐ Vacant unit turnaround and occupancy practices are documented

☐ Work-order systems show timely response and completion

☐ Preventive maintenance records are current

☐ Inspection findings and corrective actions are documented

☐ Resident complaints and management responses are organized

☐ Common areas, office records, signage, and required postings are review-ready

7. Financial & Contract Administration

☐ Rent collection and delinquency procedures are consistently applied

☐ Security deposit records reconcile with tenant files and ledgers

☐ HAP/voucher submissions are timely and supported

☐ Repayment agreements and adjustments are documented

☐ Financial records requested by the reviewer are accessible

☐ Prior MOR, audit, inspection, or monitoring findings have documented closeout evidence

30 Days Before the MOR: Conduct a Mock Review

Do not wait for the reviewer to choose the files. Pull a representative sample yourself and review them as if you were the contract administrator. Include recent move-ins, annual recertifications, interim recertifications, zero-income households, households with assets, households with earned income, and files involving special circumstances. Track every deficiency on a correction log with an owner, due date, and proof of completion.

14 Days Before: Move From Correction to Verification

- Confirm every correction is actually in the file - not merely listed as completed.
- Reconcile certifications against the property software, tenant ledger, and supporting verification.
- Check that policies match current staff practice.
- Organize requested documents in the same order as the reviewer's request list.
- Prepare staff to explain processes consistently and factually.
- Create a single MOR command center: document index, correction log, contact list, and requested-file tracker.

The Day Before: Final Readiness Check

☐ Office, files, postings, and required notices are orderly and accessible.

☐ Selected staff know who will answer compliance, maintenance, financial, and resident-file questions.

☐ Electronic records can be accessed without delays.

☐ Outstanding issues are disclosed internally and supported by a corrective-action plan.

☐ No one is 'fixing' documents in a way that changes historical facts. Corrections should be transparent, dated, and supported.

During the MOR: What Good Teams Do Differently

The strongest property teams are organized, responsive, and calm. They answer the question asked, provide the requested support, and avoid guessing. If a document cannot be located immediately, assign one person to retrieve it while the review continues. If the reviewer identifies a concern, document it in real time so the team can begin researching the issue before the close-out meeting.

HCA TIP: Never argue from memory. Respond from the regulation, policy, file, system record, or documented procedure.

After the MOR: Treat Findings Like a Project

HUD's MOR framework contemplates documented deficiencies, corrective actions, target completion dates, and follow-up verification. Once the report arrives, convert each finding into a corrective-action tracker. Assign responsibility, gather proof, correct systemic causes, and retain a clean response package.

- Separate one-time file errors from systemic process failures.

• Correct affected files and determine whether additional files may have the same issue.

• Update policies, forms, workflows, or training when the root cause is procedural.

• Respond by the required deadline with concise explanations and supporting evidence.

• Retain the final response, proof of correction, and closeout documentation for the next review.

Common MOR Problems That Are Preventable

Common Risk	Prevention
Incomplete or inconsistent tenant files	Use a standardized pre-audit checklist and second-level quality review.
Late or unsupported recertifications	Run aging reports weekly and maintain a documented escalation process.
EIV discrepancies without resolution	Track report dates, discrepancy research, tenant contact, and final resolution.
Policies that do not match practice	Review policies with onsite staff and update workflows before the MOR.
Prior findings still open	Maintain a permanent findings tracker with proof of correction and closeout.
Disorganized MOR document production	Build a labeled electronic and/or paper MOR binder before the reviewer arrives.

A Practical MOR Master Checklist

☐ Review the MOR scheduling letter and document request line by line.

☐ Download and review the current HUD-9834 materials applicable to the property.

☐ Review the prior MOR and verify every prior finding has closeout support.

☐ Audit management policies, Tenant Selection Plan, EIV, VAWA, fair housing, and Section 504 documentation.

☐ Pre-audit a representative sample of tenant files.

☐ Review waiting-list and applicant-selection documentation.

☐ Reconcile certifications, rent calculations, ledgers, and software records.

☐ Review EIV reports, discrepancy resolution, and security controls.

☐ Confirm required notices, posters, and resident-facing information are current.

☐ Review work orders, inspections, vacancy turnaround, and complaint records.

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☐ Organize financial and HAP-related documentation requested for the review.

☐ Create a written correction log and verify every correction.

☐ Prepare staff for reviewer questions and assign subject-matter contacts.

☐ Organize all requested materials in a reviewer-friendly index.

☐ After the MOR, track every finding through documented closeout.

Final Takeaway

MOR preparation is not about creating a perfect-looking binder. It is about proving that the property has reliable systems, accurate resident files, consistent policies, and a culture of compliance. The best time to find a problem is before the reviewer does. A disciplined pre-MOR review gives owners and management agents the opportunity to correct errors, strengthen processes, train staff, and enter the review with confidence.

ABOUT THE AUTHOR

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Jenna Ghisolfo is the Founder and President of Housing Consultants of America, a national affordable housing consulting firm supporting owners, management companies, nonprofits, and housing organizations with HUD and LIHTC compliance, file audits, recertifications, training, temporary staffing, and MOR preparation.

HUD References

• HUD Handbook 4350.1, Multifamily Asset Management and Project Servicing - Chapter 6 / Project Monitoring and MOR materials.

• Form HUD-9834, Management Reviews of Multifamily Projects.

• HUD Handbook 4350.3, Occupancy Requirements of Subsidized Multifamily Housing Programs.

• HUD Form HUD-9834 Addendum B, Checklist for On-Site Limited Monitoring and Section 504 Reviews.