

Rental Assistance Demonstration: Guide to Completing and Submitting the Completion Certification to HUD

About this Guide

This document provides step by step instructions for Owners and PHAs for completing and submitting the Completion Certification to HUD after closing. This guide is divided into 3 parts:

- Part I: Step by Step Instructions for Navigating to the Completion Certification Page
- Part II: Instructions for Completing the Completion Certification: No Rehab version
- Part III: Instructions for Completing the Completion Certification: Rehab/Construction version

Types of Completion Certifications, Due Dates, & Requesting Extensions

All transactions must complete this certification electronically via www.radresource.net. There are two types of Completion Certifications, based on whether or not post-closing repairs were included in the RAD Conversion Commitment (RCC). The RAD Resource Desk automatically selects the appropriate Completion Certification type for your transaction based on the as-closed Sources and Uses information.

- 1) No Rehab:** If your transaction had no post-closing repairs (per Exhibit D of the RAD Conversion Commitment), the Completion Certification is abbreviated and is due no later than 10 days following the effective date of your HAP contract. If you are unable to meet this deadline, contact your RAD Closing Coordinator to request an extension. Note: This requirement is only applicable for transactions that closed on or after 9/5/19, the publication date of REV-4 of the RAD Notice.
- 2) Rehab:** If your transaction included post-closing repairs (per Exhibit D of the RAD Conversion Commitment), the Completion Certification is due no later than 45 days following the Work Complete Date found on page 2 of the RCC. If the repairs will not be complete by the Work Complete Date and thus you will not be able to complete this milestone submission in the required timeframe, please request an extension on the Post-Closing Processing page of the RAD Resource Desk. Your extension request should include information regarding the delay and when the work is expected to be completed. Detailed instructions on submitting a Completion Certification extension request can be found [here](#).

Note for transactions that utilized tax credits: the completion certification should be submitted based on when the RAD Scope of Work has been completed. Do not wait for the tax credit cost certification to be completed and accepted.

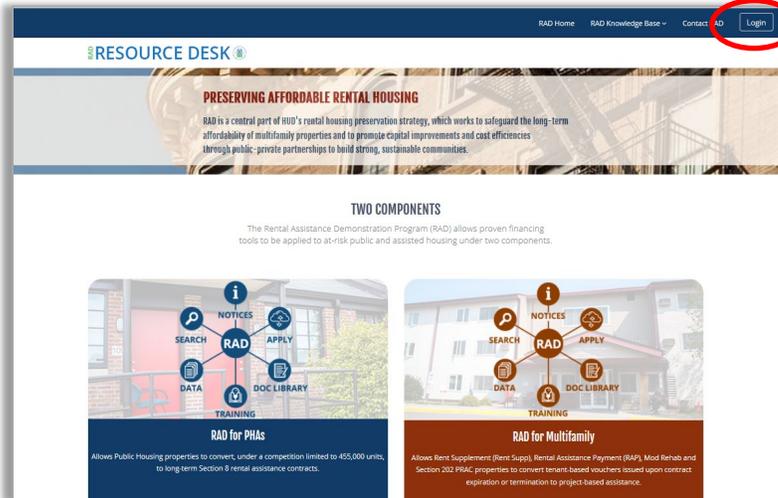
HUD Review & Approval Process

Once you have made your submission to HUD, it will be assigned to a staff member in HUD's Office of Recapitalization for review. You will be contacted by the HUD reviewer should any additional information be required; the HUD reviewer can "reopen" your submission to allow you to make edits or changes as needed. Once the submission has been reviewed and deemed complete, you will receive an email from resourcedesk@radresource.net letting you know that your submission has been approved.

Part I: Step by Step Instructions for Navigating to the Completion Certification Page

To complete the Completion Certification, following the steps below:

1. **Login** to www.radresource.net. Email resourcedesk@radresource.net for assistance with any login or access issues.



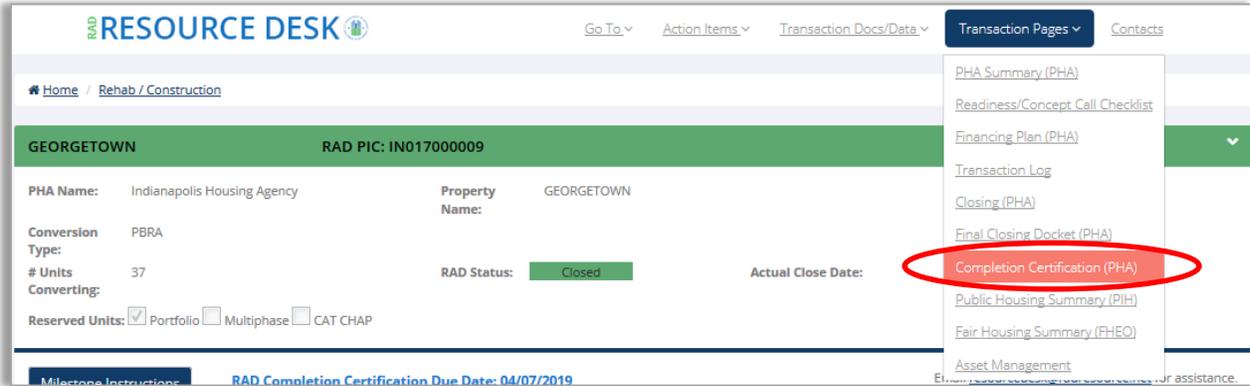
2. Once you have logged in, navigate to the menu card on your home page labeled **My Closed Properties** and **click on the name of the property** that you wish to submit the Completion Certification for. The **My Closed Properties** menu card includes that date that the certification is due. *Note: You can only submit information for projects that are closed.*

The screenshot shows the 'MY CLOSED PROPERTIES' menu card. The title is circled in red. Below the title is a table with the following data:

PHA	Property	Units Converted	Date Closed	Final Closing Docket Due	Completion Certification Due
Housing Authority of the City of New Albany (IN012)	CRYSTAL APARTMENTS	24	06/30/2016	01/16/2018*	Not Applicable
Housing Authority of the City of New Albany (IN012)	PARKVIEW	40	06/30/2016	01/16/2018*	10/08/2019*
Housing Authority of the City of New Albany (IN012)	RIVERVIEW TOWERS (Mark Elrod)	101	11/30/2018	12/11/2018*	10/07/2019*

*Actual submission date

- Once you have clicked on the property name, the property-specific page will open. From there, navigate to the **Transaction Pages** menu at the top and select **Completion Certification (PHA)**. You will then be taken to the Completion Certification page and can begin inputting information.



Part II: Completing the Completion Certification- No Rehab Version

Section 1: General Information. Review the information shown in this top section for accuracy and update as necessary, including inputting any missing information (highlighted in yellow). Check the appropriate box indicating that the information displayed is accurate. If you need to update any of the read-only fields (such as Property Name), email resourcedesk@radresource.net for assistance.

The screenshot shows the 'Milestone Instructions' section of the Completion Certification form. It includes a 'RAD Completion Certification Due Date: 04/07/2019' and an email address for assistance: resourcedesk@radresource.net. A red warning message states: 'You cannot submit this milestone until all items marked with ★ are completed. Fields highlighted in yellow are remaining items that must be completed.' The form fields are: Property Name (Georgetown Apartments), ★ Owner Entity Name (IHA Housing Partners II), ★ Owner Contact Name (yellow), ★ Owner Contact Email (yellow), ★ Owner Contact Phone (yellow), Effective Date of HAP Contract (09/01/2017), and a radio button selection for accuracy: 'All of the above is accurate as-is' (selected) OR 'I have updated the above information and it is accurate'.

Section 2: Ownership Certification. Click the checkbox under “Check to certify” to certify that the Owner made the required Initial Deposit to the Replacement Reserve. Use the provided comment box to note any deviations or issues.

The screenshot shows the 'OWNERSHIP CERTIFICATION' section of the Completion Certification form. It features a 'Check to certify' button with a red star icon. Below the button, the text reads: 'Owner certifies that owner has made the initial deposit to the Replacement Reserve account in the amount of \$128,150.00.' A red warning message states: 'Please check to certify or provide details of the deviation below'. Below this, there is a text input field for deviations: 'If the owner has not made the initial deposit, describe below:'. The form is set against a green header background.

Section 3: Right to Return. A core feature of the RAD program is that any resident has a

right to return to the property after the RAD conversion. For the most updated guidance please see section 1.4.A.5(ii) of the RAD Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project's conversion of assistance and each resident must be able to exercise his or her right to return. However, a resident can opt to voluntarily and permanently relocate by accepting an Alternative Housing Option from the PHA or project owner, though this would be rare in conversions that did not include any rehab. Please complete all questions found in this section. If all public housing units covered by the CHAP were vacant at the time of CHAP issuance, click the below box and skip the section. Otherwise, this section is applicable to all projects, regardless of whether or not there was relocation.

★ RIGHT TO RETURN

All Public Housing units covered by the CHAP were vacant as of the date of CHAP issuance. Skip this section.

1. Number of Public Housing households living at the Project at the time of CHAP issuance (05/25/2015) (cannot be 0):
2. Number of Public Housing move-ins between CHAP issuance and HAP effective date:
3. Moved out between CHAP issuance and the HAP effective date:
4. Evicted between CHAP issuance and the HAP effective date:
5. Total Households Eligible for the Right of Return (Line 1 + Line 2 - Line 3 - Line 4):
6. Of the households identified in Line 5 above, how many:
 - 6a. Resided at the project following conversion (as of the HAP effective date):
 - 6b. Voluntarily accepted Alternative Housing Options in lieu of returning to the covered project following conversion (this is rare):
7. Total households not included above (Line 6a - Line 6b):

★ Please explain any discrepancies or abnormalities in the data provided above:

Submit to HUD: When all required fields have been completed, the **Submit Completion Certification to HUD** button will be bright red and you will be able to click it. If the button is not allowing you to click it, it means that there some of the required fields are blank or you do not have permission to make the submission based on your RAD Resource Desk user profile. Contact resourcedesk@radresource.net for assistance. Click **Save and Return Later** if you are not done and wish to save the information without submitting it to HUD and resume completing the information at a later date.

Incomplete & not ready for submission:

CERTIFICATION

Certification Statement
I, Jennifer Green, certify that I have the authority to submit this information to HUD and further certify under penalty of perjury under 28 U.S.C. Section 1746 that the statements and information contained herein are, to the best of my knowledge, truthful and accurate.

Complete & ready for submission:

CERTIFICATION

Certification Statement
I, Jennifer Green, certify that I have the authority to submit this information to HUD and further certify under penalty of perjury under 28 U.S.C. Section 1746 that the statements and information contained herein are, to the best of my knowledge, truthful and accurate.

Part III: Completing the Completion Certification- Rehab/Construction Version

Section 1: General Information. Review the information shown in this top section for accuracy and update as necessary, including inputting any missing information (highlighted in yellow). Check the appropriate box indicating that the information displayed is accurate. If you need to update any of the read-only fields (such as Property Name), email resourcedesk@radresource.net for assistance.

Section 2: Ownership Certifications. Click the checkbox under “Check to certify” to certify to each corresponding statement.

- a) **Certification #1 – Provide Final Sources & Uses:** The Owner must input the final, post-rehab sources and uses in the Transaction Log > Post Conversion column. The column has been pre-populated with the “as closed” data so the Owner should review the information and make changes as needed. The final S&U should include all permanent financing and any changes as a result of an increase or decrease in the RAD scope of work.

For tax credit transactions, utilize the numbers available at RAD scope of work completion (Recap does not require the submission of audited financials for purposes of submitting the S&U for the completion certification). If conversion to permanent financing will be occurring later, make the completion certification submission now using the available numbers and include a comment in the available text box with an estimate regarding when the conversion to permanent financing will occur.

- b) **Certification #2 – RAD Conversion Commitment (RCC) Scope of Work:**

- **Date Work Complete:** Input the date that the Work was completed in the **Date Work Completed** field. This should be the date that all repairs shown in the exhibit to the RCC were completed.
- **Amount of Rehab/Construction as of RAD Closing:** This field is prepopulated with the amount from the final sources and uses submitting at the time of the RAD closing, before rehab began. Populate the **Actual Amount, if different** field based on the final rehab/construction cost amount. If the Actual Amount is higher than the as-closed amount, input the **Source of Additional Funding**. Use the provided comment box to explain any deviations from the scope of work and cost increases/decreases and, for increases, how those costs were covered.
- **Upload Third Party Completion Certification:** If repairs exceed \$2,000 per unit, you are required to upload a certification from a third party (architect, lender, general contractor, LIHTC investor, etc.) that confirms that the repairs outlined in the RAD Conversion Commitment scope of work were completed. The document uploaded must specifically refer to the RAD Scope of Work and HUD encourages Owner’s to submit this certification via the template provided in the link that says **View Template**. Do not upload the full LIHTC Cost Certification unless it specifically references the RAD Scope of Work. To upload the certification, click **Browse**, select the file on your computer, and click **Add File**.

- Use the provided comment box to explain any deviations in scope or cost or any other abnormalities.

- c) **Certification #3 – Initial Deposit to the Replacement Reserves:** Click the checkbox under “Check to certify” to certify that the Owner made the required Initial Deposit to the Replacement Reserve. Use the provided comment box to note any deviations or issues.
- d) **Certification #4 – No liens on the property:** Click the checkbox under “Check to Certify.” If any liens remain on the property that have not been approved by HUD, explain the circumstances and provide a timeline regarding when they will be removed.
- e) **Certification #5 – RAD Units Abated for Lead Based Paint (LBP):** Input the number of RAD units abated for lead-based paint hazards as a result of the RAD Scope of Work. This question only applies to abatement activities included in the scope of work attached to the RAD Conversion Commitment and only applies to RAD units at the property.

Section 3: Right to Return. A core feature of the RAD program is that any resident has a right to return to the property after the RAD conversion. For the most updated guidance please see section 1.4.A.5(ii) of the RAD Notice and the RAD Fair Housing, Civil Rights, and Relocation Notice. Permanent involuntary displacement of public housing or Section 8 assisted residents may not occur as a result of a project’s conversion of assistance and each resident must be able to exercise his or her right to return. However, a resident can opt to voluntarily and permanently relocate by accepting an Alternative Housing Option from the PHA or project owner. Please complete all questions found in this section. If all public housing units covered by the CHAP were vacant at the time of CHAP issuance, click the below box and skip the section. Otherwise, this section is applicable to all projects, regardless of whether or not there was relocation.

★RIGHT TO RETURN

All Public Housing units covered by the CHAP were vacant as of the date of CHAP issuance. Skip this section.

1. Number of Public Housing households living at the Project at the time of CHAP issuance (05/25/2015) (cannot be 0):	<input style="background-color: #FFD700;" type="text"/>
2. Number of Public Housing move-ins between CHAP issuance and HAP effective date:	<input type="text"/>
3. Moved out between CHAP issuance and the HAP effective date:	<input type="text"/>
4. Evicted between CHAP issuance and the HAP effective date:	<input type="text"/>
5. Total Households Eligible for the Right of Return (Line 1 + Line 2 - Line 3 - Line 4):	<input style="background-color: #cccccc;" type="text" value="0"/>
6. Of the households identified in Line 5 above, how many:	
6a. Resided at the project following conversion (as of the HAP effective date):	<input type="text"/>
6b. Voluntarily accepted Alternative Housing Options in lieu of returning to the covered project following conversion (this is rare):	<input type="text"/>
7. Total households not included above (Line 6a - Line 6b):	<input style="background-color: #cccccc;" type="text" value="0"/>

★Please explain any discrepancies or abnormalities in the data provided above:

Section 4: Section 3 Reporting Information: All RAD conversions that completed rehab/construction as outlined in the RAD Conversion Commitment are subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Provide the required Section 3 information as prompted. Click on **View Section 3 Instructions** for additional instructions. For general questions about Section 3, email section3@hud.gov and for specific questions about Section 3 reporting, email 60002Questions@hud.gov.

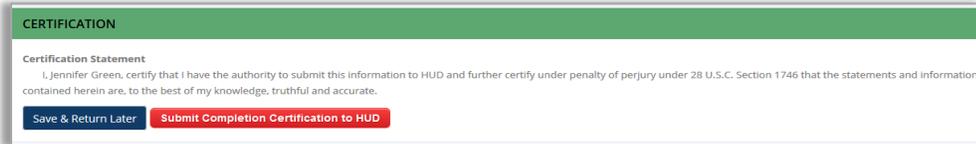
Submit to HUD. When all required fields have been completed, the **Submit Completion Certification to HUD** button will be bright red and you will be able to click it. If the button is not allowing you to click it, it means that there some of the required fields are blank or you do not have permission to make the submission based on your RAD Resource Desk user profile. Contact resourcedesk@radresource.net for assistance. Click **Save and Return Later** if you are not done and wish to save the information without submitting it to HUD and resume completing the information at a later date.

Incomplete & not ready for submission:



The screenshot shows a form titled "CERTIFICATION" with a green header. Below the header, it says "Certification Statement" followed by a paragraph: "I, Jennifer Green, certify that I have the authority to submit this information to HUD and further certify under penalty of perjury under 28 U.S.C. Section 1746 that the statements and information contained herein are, to the best of my knowledge, truthful and accurate." At the bottom of the form, there are two buttons: "Save & Return Later" (dark blue) and "Submit Completion Certification to HUD" (red). The red button is dimmed, indicating it is not clickable.

Complete & ready for submission:



The screenshot shows the same "CERTIFICATION" form as above. The text and paragraph are identical. However, the "Submit Completion Certification to HUD" button is now bright red and appears to be active and clickable.