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**HEALTHCARE MORTGAGEE ADVISORY COUNCIL**

Financing Seniors Housing for America



# FROM THE CLOSING CORNER

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HMAC CONFERENCE 2022

# MEET THE PANEL



# PANELISTS

Moderator: Tina Laurie, PGIM Real Estate

Panelist: Blair L. Schiff, Troutman Pepper, LLP

Panelist: Evan Clark, Baker, Donelson, Bearman, Caldwell & Berkowitz, PC

Panelist: Jason P. Roth, Closing Team Workload Manager, ORCF

Panelist: Raymond Keyser, Chief Counsel, OGC Region V

Panelist: Amy Jo Conroy, Attorney, OGC Region V

Panelist: Kelley Mason, Closing Coordinator, ORCF



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# REFRESHER ON ORCF UPDATES



# ORCF UPDATES

- Elimination of hard copies post closing.
  - Announced on May 9<sup>th</sup> LEAN E-mail Blast
- New HUD Attorney and Closer Checklists
  - For 223(f) and 223(a)(7) Effective April 2022 announced on May 9<sup>th</sup>, 2 LEAN E-mail Blast
  - New Attorney Punchlist – February
- ORCF & OGC change in HUD attorney assignment.
  - How is this going?
  - What are the steps of assignment?
  - Priority Workload – will it stay in place?
- Post Closing Undertakings

# TIPS/BEST PRACTICES

- What is required if License expires within 30 days of closing?
  - Copy of renewal application
  - Evidence of payment
- Original Documents: What are best practices for retention of original closing documents beyond what your GNMA Mae document custodian needs?
  - Guidance on HUD Website
  - Original Regulatory Agreements? Do we keep originals?
    - LEAN E-mail Blast from February 24, 2021 provides information on where to include the HUD Attorney name and address.

# ATTORNEY DISCUSSION



# ATTORNEY OUTLET

1. What do you recommend doing to speed up the closing process?

- **How the Attorney Assignment works and Lack of OGC Access to the Portal**
- **Anticipate and resolve potential closing issues by completing a quality legal review during the application stage**
- **Resolve all Business issues prior to issuance of Firm Commitment (especially Master Lease and AR)**
- **Prepare, Prepare, Prepare for the Firm Commitment**



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# ATTORNEY OUTLET CONTINUED

2. What are your pet peeves during the closing process?

- **Dummy Documents**
- **Impact of title company on a timely closing**
- **Protracted comments via email that can be resolved with a quick phone call. Delays in receiving authorization to obtain HUD's signature**
- **Focusing on the trees instead of the forest**

# ATTORNEY OUTLET CONTINUED

3. What are some tips for dealing with unique LEAN issues prior to the closing process?

- **Early Discussions with HUD Underwriter**
- **Lean Thinking; HUD's LEAN/232 Email Blasts; Phone-a-friend**
- **Utilize the LEAN community network including HUD**

# CLOSING ITEMS



# ITEMS TO REMEMBER AT CLOSING

- Timing of rate lock after Firm has been issued:
  - Before Rate Locking:
    - Remember to submit the COVID narrative.
      - Good for 60 days from Firm Issuance
    - Cash Flow Stress Test
  - Rate Increases above the rate in the Firm Commitment:
    - Cash Flow Stress Test for Rate Increase
    - Updated Decision Circuit for interest rate increase
    - Still need to maintain DSCR for 223(f) 1.45x and 223(a)(7) 1.11x

## ITEMS AT CLOSING CONTINUED

- Special Conditions
  - Address special conditions before you submit your closing package
  - Waivers if they are not addressed at UW submit at the beginning of closing.



Don't  
Forget!

# PORTAL REFRESHER



# PORTAL CONTINUOUS UPDATES

- Portal process is a little faster
- Patience is your friend
- Portal Team continuing to correct errors
- Fixes are not fast
  - Can take up to 3-4 weeks
- Your concerns do not go unheard

# MULTIPLE LOGINS????

- Issue
  - Attorneys work with multiple lenders
  - Access to projects from multiple lenders
- Resolution????
  - Special User Option access provided by the Lender





# SPECIAL USER OPTION

- Lender can assign specific projects to a Special User (SOU)
- Refer to HHCP Healthcare Portal Special Option User Manual (Lender) Version 1.2
  - Instructs how to assign SOU role
- Refer to HHCP Healthcare Portal Special Option User Manual Version 1.2
  - Instructions for SOU on how to access the portal and the specific project
- Manual Version 1.2 will be updated soon
  - [ORCF: 232 Healthcare Portal Training | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

# Process Flow of Multi-Lender Assignment

**Step 1:** Log into application as Lender Account Manager or Backup Account Manager.



The screenshot shows a web browser window with the URL [pslsolutions.net](http://pslsolutions.net). The page title is "232 Healthcare Portal" and the version is "Version 3.0.0.0". The page features a logo for the U.S. Department of Housing and Urban Development. The main content is divided into two columns. The left column, titled "Section 232", contains three bullet points: "Office of Residential Care Facilities (ORCF)", "Section 232", and "Reengineered". The right column, titled "Log In", contains a "User name" field with a "Help with Logging in" link, a "Password" field with a "Forgot your password?" link, and a "Log In" button. Below the login fields, there is a note: "In the IE Tools menu, please turn off Pop-up blocker for this site. For best performance, use IE 10 or higher." At the bottom of the page, there are two small text blocks regarding information collection requirements and the Paperwork Reduction Act.

**Section 232**

- **Office of Residential Care Facilities (ORCF)** - The ORCF administers the Section 232 loan program. Section 232 is an FHA-insured loan product that covers housing for the frail elderly - those in need of supportive services. Nursing homes, assisted living facilities, and board and care are all examples of this type of housing (a project may include more than one type).
- **Section 232** - Section 232 may be used to finance the purchase, refinance, new construction, or substantial rehabilitation of a project. A combination of these uses is acceptable - e.g. refinance of a nursing home coupled with new construction of an assisted living facility.
- **Reengineered** - The program was re-engineered in 2008 to provide exceptional customer service, reduce processing time, and streamline operations to reduce risk to the FHA fund.

**Log In**

User name [Help with Logging in](#)

Password [Forgot your password?](#)

**Log In**

*In the IE Tools menu, please turn off Pop-up blocker for this site.  
For best performance, use IE 10 or higher.*

- Information collection requirements contained in this document have been approved by the Office of Management and Budget(OMB) under the Paperwork Reduction Act of 1995(44 U.S.C § 3501-3520) and assigned OMB Control Numbers 2502-0605.
- In accordance with the paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB Control Number.

Click on Register tab from the Administration tab on the Quick Navigation Toolbar.

The screenshot shows a web browser window with the URL `pslsolutions.net/Home/Landing`. The page header includes the U.S. Department of Housing and Urban Development logo, the title "232 Healthcare Portal", and user information: "Version 3.0.0.0", "Log out", "Welcome James Shoup", and "Lender Account Manager". A navigation bar contains tabs for Home, Tasks, Group Tasks, Financial Analysis, Asset Management, Production, Administration, and Help Desk. The Administration tab is expanded, showing a dropdown menu with options: Manage User, Register, Change Password, and Manager Services. The Register option is highlighted. Below the navigation bar, the breadcrumb "Home > Landing" is visible, followed by a list of links: "Office of Residential Care Facilities", "Healthcare Mortgage Insurance Program Handbook (4232.1)", "Contact an Employee", "Loan Servicing and Asset Management of 232 Loans", and "Section 232 Forms and Documents". A large image collage at the bottom features several photographs of residential buildings. One prominent image shows "The Lodge at Natchez Trace, located in Nashville, Tennessee Welcomes New Residents". Other partially visible text includes "White House single-story Nashville", "Elizabeth Seton Pediatric Center", "Eight, formerly to Lewis Park, loan to welcome", and "struction - The 22 miles north of 8 beds." The browser's address bar at the bottom shows the URL `https://www.pslsolutions.net/Account/RegisterUserStep1`.

**Step 3:** Select Special Option User and move to assigned roles by clicking on right facing arrow and click on continue button below.

The screenshot displays the '232 Healthcare Portal' interface. The browser address bar shows 'pslsolutions.net/Account/RegisterUserStep1'. The page header includes the portal logo, the title '232 Healthcare Portal', and user information: 'Version 3.0.0.0', 'Log out', 'Welcome James Shoup', and 'Lender Account Manager'. A navigation menu contains links for Home, Tasks, Group Tasks, Financial Analysis, Asset Management, Production, Administration, and Help Desk. The main content area shows a breadcrumb trail 'Home > Administration > Register' and a section titled 'Create New User Account'. Under 'User Type', a dropdown menu is set to 'External User'. Below this, there are two columns of roles. The 'Available Roles' column lists: Lender Account Manager, Backup Account Manager, Special Option User (highlighted), Lender Account Representative, Operator Account Representative, and Inspection Contractor. The 'Assigned Roles' column is currently empty. A right-facing arrow button is located between the two columns, and a 'Remove selected' button is positioned below it. At the bottom of the role selection area are 'Continue' and 'Cancel' buttons.



Home > Administration > Register

## Create New User Account

User Type: External User

### Available Roles:

- Lender Account Manager
- Backup Account Manager
- Lender Account Representative
- Operator Account Representative
- Inspection Contractor



### Assigned Roles:

- Special Option User

Continue

Cancel

**Step 4:** Now select the FHA-number or numbers from “Available FHAs” that you want to assign to the special option user and move the selected FHA-number(s) to “Selected FHAs” by clicking on right facing arrow and click on continue button below.

The screenshot shows a web browser window with the URL `pslsolutions.net/Account/RegisterServicer`. The page header includes the U.S. Department of Housing and Urban Development logo, the title "232 Healthcare Portal", and user information: "Version 3.0.0.0", "Log out", "Welcome James Shoup", and "Lender Account Manager". A navigation menu contains: Home, Tasks, Group Tasks, Financial Analysis, Asset Management, Production, Administration, and Help Desk.

The main content area is titled "Select FHA's for the Special Option user". It features two columns:

- Available FHAs:** A list of FHA numbers and descriptions. The entry "999-22222 (smpl fha)" is selected and highlighted in blue.
- Selected FHAs:** An empty list box.

Between the two lists are two arrows: a right-pointing arrow (to move items from Available to Selected) and a left-pointing arrow (to move items from Selected back to Available). A "Remove selected" button is positioned above the left-pointing arrow.

At the bottom of the interface are two buttons: "Continue" and "Cancel".



### Select FHA's for the Special Option user

**Available FHAs:**

- 126-22171 (Creekside Rehab and Nursing)
- 126-22176 (Ridgeview Assisted Living and W
- 126-22178 (Marjorie House)
- 129-22027 (MISSION HILLS HEALTH CARE
- 129-43042 (Oceanside Post Acute)
- 136-22080 (Tracy Convalescent and Rehabil
- 777-77777 (77777777)
- 888-88888 (88888888)

**Selected FHAs:**

- 999-22222 (smpi fha)

Continue

Cancel

**Step 5:** Now click on check user button to register existing user as Special Option User (user is already existing in portal)

**Note:** If you want to create new user fill in the form and continue with “Register” button.

pslsolutions.net/Account/Register

232 Healthcare Portal

Version 3.0.0.0  
Log out  
Welcome James Shoupe  
Lender Account Manager

Home Tasks Group Tasks Financial Analysis Asset Management Production Administration Help Desk

Home > Administration > Register > Create New Account

Create a new account

First Name  
Last Name  
Organization  
Street Address  
State Select State  
Time Zone Select Timezone  
User Name

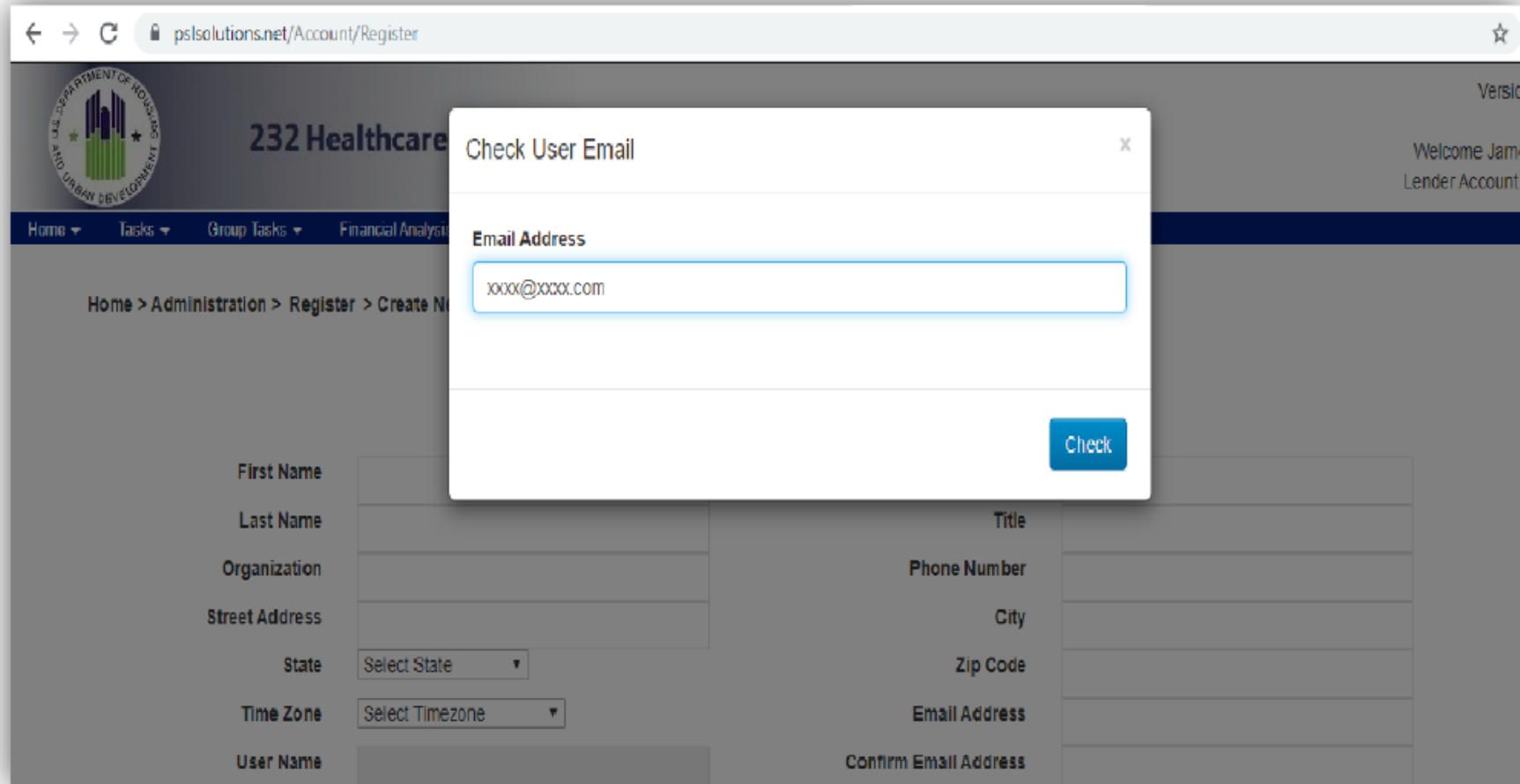
Middle Name/Initial  
Title  
Phone Number  
City  
Zip Code  
Email Address  
Confirm Email Address

Register Cancel Check User

Check User



**Step 6:** Once you click on check user button, the 'Check User Email' window will pop up. Enter the email id of user to whom you want to assign the special option user role to and click on "Check." Then another pop up will display confirming that user already exist or not, and to continue with existing user click on "Yes" (Can see in this process in below screens)



The screenshot shows a web browser window with the URL `pslsolutions.net/Account/Register`. The page is titled "232 Healthcare" and features a navigation menu with "Home", "Tasks", "Group Tasks", and "Financial Analysis". A modal dialog box titled "Check User Email" is open, containing an "Email Address" input field with the placeholder text "xxxx@xxxx.com" and a blue "Check" button. The background registration form is partially visible, showing fields for "First Name", "Last Name", "Organization", "Street Address", "State" (with a "Select State" dropdown), "Time Zone" (with a "Select Timezone" dropdown), "User Name", "Title", "Phone Number", "City", "Zip Code", "Email Address", and "Confirm Email Address".

psolutions.net/Account/Register

232 Healthcare

Version  
Welcome James  
Lender Account M

Home → Tasks → Group Tasks → Financial Analysis

Home > Administration > Register > Create N

User Confirmation

User already exists, Do you want to continue with existing details?

No Yes

First Name  
Last Name  
Organization  
Street Address  
State Select State  
Time Zone Select Timezone

Title  
Phone Number  
City  
Zip Code  
Email Address

← → ↻ [psisolutions.net/Account/Register](https://psisolutions.net/Account/Register) ☆ N

# 232 Healthcare Portal

Version 3.0

Log

Welcome James Shi

Lender Account Mana

[Home](#) > [Tasks](#) > [Group Tasks](#) > [Financial Analysis](#) > [Asset](#)

www.psisolutions.net says


User Registered Successfully

OK

[Home](#) > [Administration](#) > [Register](#) > [Create New Account](#)

### Create a new account

First Name	<input type="text"/>	Middle Name/Initial	<input type="text"/>
Last Name	<input type="text"/>	Title	<input type="text"/>
Organization	<input type="text"/>	Phone Number	<input type="text"/>
Street Address	<input type="text"/>	City	<input type="text"/>
State	<input type="text" value="Select State"/>	Zip Code	<input type="text"/>
Time Zone	<input type="text" value="Select Timezone"/>	Email Address	<input type="text"/>

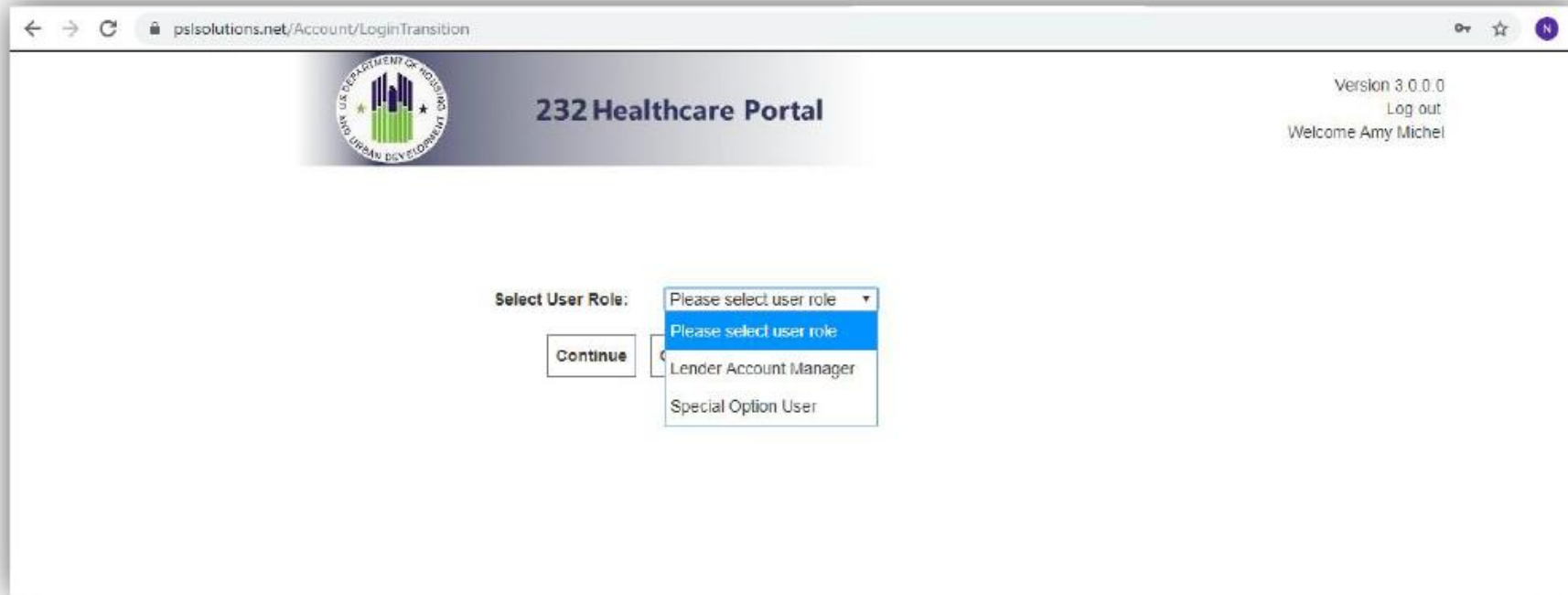


**Step 7:** Once user registration is done, the page will redirect to below screen. There we can verify the user and check roles assigned to the user.

The screenshot shows a web browser window with the URL `pslsolutions.net/Account/ListUsers#`. The page header includes the logo of the U.S. Department of Housing and Urban Development, the title "232 Healthcare Portal", and the version "Version 3.0.0.0". The user is logged in as "James Shoup, Lender Account Manager". A navigation menu contains: Home, Tasks, Group Tasks, Financial Analysis, Asset Management, Production, Administration, and Help Desk. The current page is "Home > Administration > Manage Users". A search bar contains the text "amichel@gershman.com" with "Search" and "Reset" buttons. Below the search bar is a table of users.

User Name	Role	First Name	Middle Name/Initial	Last Name	Title	Organization	Lender Name	Phone Number
amichel@gershman.com	Lender Account Manager, Special Option User	Amy		Michel		Gershman Investment Corp	GERSHMAN INVESTMENT CORP (24654)	(314) 221 - 817

**Step 8:** Now have the newly registered Special Option User login to their account with the special option user role and select role from dropdown and click continue.



**Step 9:** Once after you have logged in as special option user all the remaining process is the same as the existing process.

psolutions.net/Home/Landing

Version 3.0.0.0  
Log out  
Welcome Amy Michel  
Special Option User

Home ▾ Tasks ▾ Group Tasks ▾ Asset Management ▾ Production ▾ Administration ▾ Help Desk ▾

Home > Landing

Office of Residential Care Facilities  
Healthcare Mortgage Insurance Program  
Contact an Employee  
Loan Servicing and Asset Management of 232 Loans  
Section 232 Forms and Documents

Application Process  
Construction Application Process  
Closing Process  
Amendments  
Production Lender PAM Report

The Lodge at Natchez Trace, located in Nashville, Tennessee Welcomes New Residents

https://www.p solutions.net/ProductionApplication/Index

# EXECUTED DOCUMENTS

- CDs or Thumb Drives for Executed Documents are no longer accepted
- The Portal is the only system used to obtain Executed Documents
- In order to upload Executed Documents:
  - Lenders must ensure the firm is uploaded to the FC Request RAI
  - Ensure to upload Draft package to Production → Closing Process → Non-Construction Draft Closing (required for Executed Documents)
- Once the Closer has completed the review process the Portal will generate an email asking you to upload the executed documents



# SAMPLE EMAIL FROM PORTAL

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have concerns about the content of the email, please send it to [phishing@hud.gov](mailto:phishing@hud.gov) or click the Report Phishing Button on the Outlook ribbon or Phishing option within OWA.

\*\*\*\* PLEASE DO NOT REPLY TO THIS EMAIL. THIS EMAIL ACCOUNT IS AUTOMATED AND NOT REGULARLY MONITORED BY STAFF \*\*\*\*

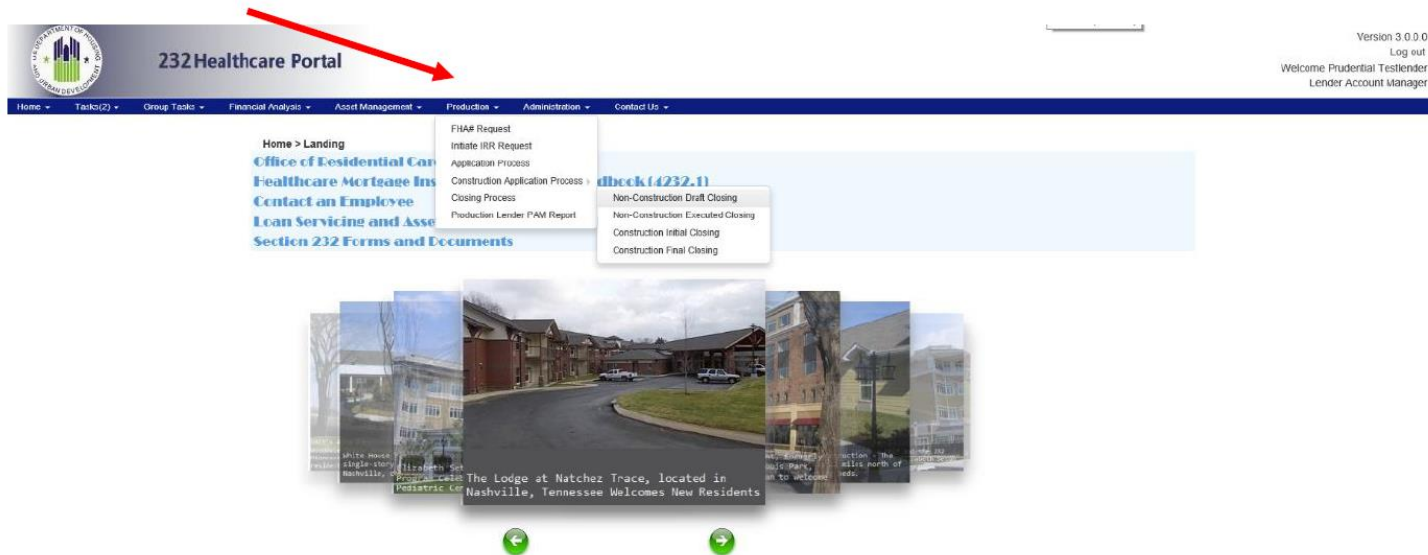
This project has successfully closed. Please upload The Closing Documents to the 232 Healthcare Portal as soon as possible.

Any questions or issues regarding the project should be directed to Kelly L Mason, the assigned Account Executive/Closer for this project





- Upload Executed Documents to Production → Closing Process → Non-Construction Executed Closing



- Ensure file names are correct, this will generate an error if the file name is not acceptable
- The system will ask you to rename the documents to correspond with the acceptable file name



# WHAT TO DO WHEN YOU ENCOUNTER AN ERROR

- Contact Kelley Mason
  - Email at [kelley.l.mason@hud.gov](mailto:kelley.l.mason@hud.gov)
    - Please CC your closer to keep them in the loop
  - Set up a TEAMS/Zoom call to allow me to view the steps taken
- If a helpdesk ticket is required
  - Include screenshots in the ticket
  - Tickets can take 3-4 days to be receive a response
- Patience
  - We continue to tweak the system to make it more efficient



# TRAINING

[Home](#) / [Federal Housing Administration](#) / [Healthcare Programs](#) / [Residential Care Facilities](#) / [232 Healthcare Portal](#) / [Portal Training](#)

## 232 Healthcare Portal Training

This page contains training for the 232 Healthcare Portal. Please access 232 Healthcare Portal training documents using the links below.

### 232 Healthcare Portal

- [Lender Access Form for the 232 Healthcare Portal](#)
- [232 Healthcare Portal Rules of Behavior \(Optional\)](#)
- [Accessing the 232 Healthcare Portal](#)
- [Logging into the 232 Healthcare Portal](#)
- [Providing Special Option User Access to the Portal for LAM&BAM](#)
- [Accessing the Portal as a Special Option User \(SOU\)](#)
- [Lender Production Tasks Reassignment](#)
- [Help Desk Instructions](#)
  - [Help Desk Manual](#)
  - [Help Desk Training Tutorial \(Video\)](#)

### Asset Management

- [Asset Management Other Project Actions \(OPA\) Portal Guide](#)
- [Asset Management Other Project Actions \(OPA\) Portal Training Video](#)
- [Asset Management Training FAQ and Responses from \(2/12/2020 - 2/13/2020\)](#)
- [Submitting Operator Financial Statements](#)
- [Quarterly Operator Financials Due Dates For Operators and Lenders](#)
- [Submitting a Reserve for Replacement Request](#)
- [Reserve for Replacement Presentation](#)
- [Submitting a Non-Critical Repair Escrow Request](#)
- [Non-Critical Repair Escrow Presentation](#)
- [Lender Instructions for Administrative Functions](#)

### Production

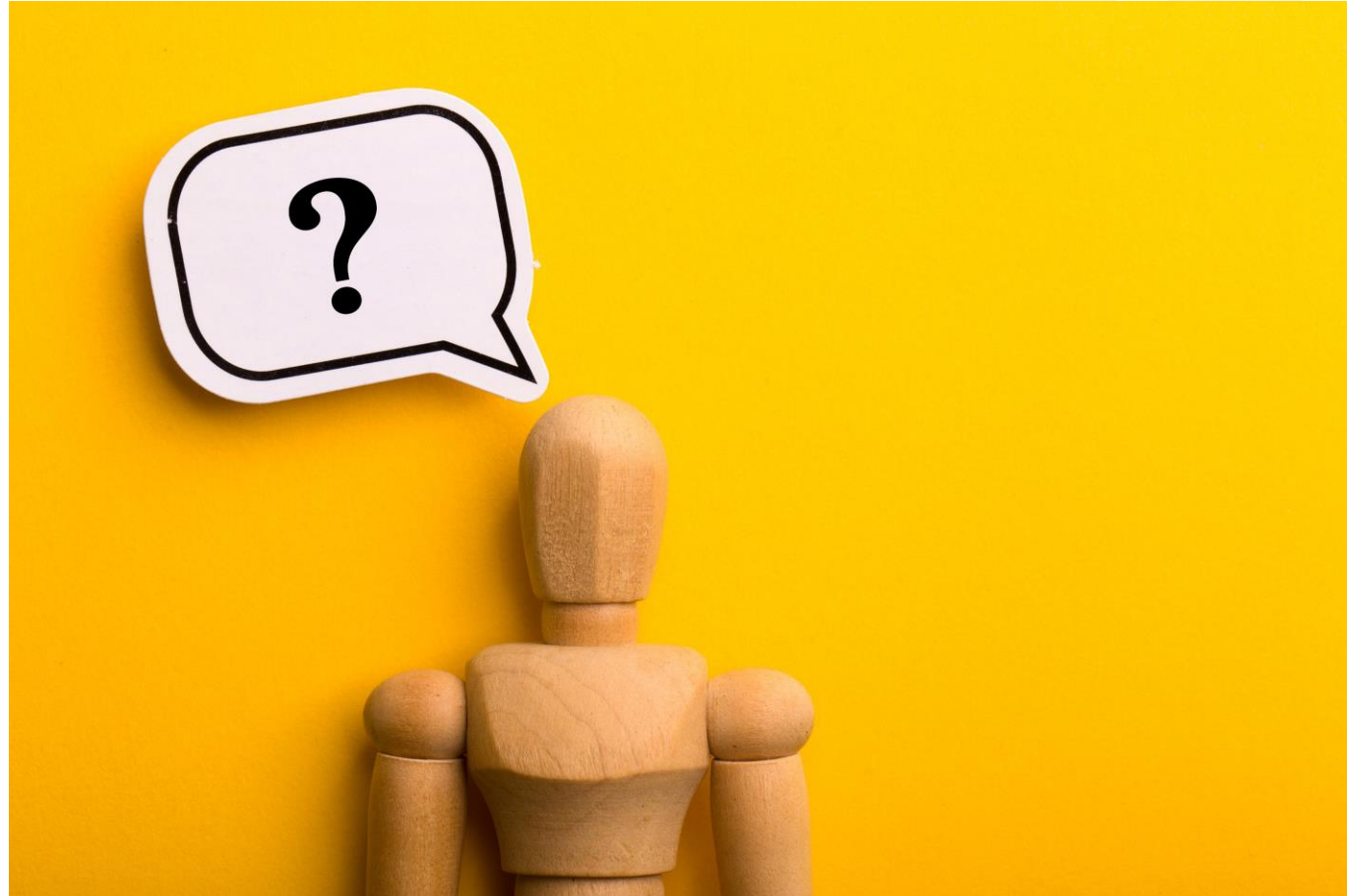
- [Production Training Video](#)
- [Submitting a New Application Request](#)
- [232 Healthcare Portal Instructions for 232 Lenders](#)

# PORTAL HELPFUL LINKS

- Training was posted to:
- [ORCF: 232 Healthcare Portal Training | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)
- Can check FAQs for any Portal Questions:
- [https://app.smartsheet.com/b/publish?EQBCT=d1f8af74ddef4b9ab82e0a720078fa41](#)
- Portal Link:
- [https://www.hud232portal.com/](#)



# QUESTIONS



# PANELIST'S BIOS



# Blair L. Schiff

## Troutman Pepper

**Blair Schiff**, is a partner in the Washington Office of Troutman Pepper, where he concentrates in the areas of real estate, housing and policy development. Blair's practice involves closings of multifamily and healthcare projects throughout the US, and he specializes in the Section 232 transactions, coordinating complex portfolio transactions involving account receivable financing and master lease structures. As well as working with Lenders, Mr. Schiff also represents a number of developers and public housing authorities navigating through the restrictions that go with the federal programs.



**Evan Clark**  
**Baker, Donelson, Bearman,**  
**Caldwell & Berkowitz, PC**

**Evan Clark**, is a shareholder with Baker, Donelson, Caldwell & Berkowitz, where he is counsel to lenders and borrowers in HUD-insured long-term care, seniors housing, and multifamily loans throughout the United States ranging from large scale, multi-state portfolio transactions to single-asset deals. He has also served as counsel to lenders and borrowers in bridge-to-HUD loans throughout the country.





# JASON P. ROTH ORCF

- **Jason Roth**, is currently a Workload Manager and leads ORCF's Closing Team. He has worked at HUD for over 30 years and has a wealth of experience in both Underwriting and Closing FHA insured loans. Jason's current tenure at HUD dates back to 2000, when he worked in the Baltimore Field Office before joining ORCF in 2011.



# RAYMOND KEYSER

- **Ray Keyser**, has served as the Chief Counsel in HUD's Cleveland Field Office since 2007 where his practice focuses on FHA-insured multifamily and healthcare transactions. He began his career as a legal honors attorney in the Hartford Field Office and then spent three years at Squire, Sanders, and Dempsey as an associate in the firm's Affordable Housing Practice Group. He holds a B.A. in history from Mount Vernon Nazarene College and earned his J.D. from the Ohio State University Moritz College of Law. In 2019 he completed the Kennedy Senior Executive Fellows Program at the Harvard Kennedy School.

## Amy Jo Conroy Attorney, OGC Region V

**AmyJo Conroy**, joined HUD in 2008 through the Legal Honors Program. Based in Chicago (Region V), her portfolio includes 232 Closings, Asset Management and Public Housing matters. She currently serves as a LEAN Coordinator and is a member of the Illinois bar. Ms. Conroy's favorite superhero is She-Hulk.



# Kelley Mason

## ORCF

**Kelley Mason**, is a Senior Account Executive with ORCF. She is an experienced Closer and Title/Survey Reviewer dedicated to great customer service. She is a participant in the Management Development Program Fiscal Year 2021 Cohort.

Ms. Mason serves as a Chief Master Sergeant (E-9) in the United States Air Force Reserve. She has over 26 years of service, both Active Duty and Reserve. She is currently the Senior Enlisted Leader at the 710<sup>th</sup> Combat Operations Squadron located at Joint Base Langley-Eustis (Hampton, VA). She holds a bachelor's degree in Law and Society and a master's degree in Business from The Pennsylvania State University.



**HEALTHCARE MORTGAGEE ADVISORY COUNCIL**

Financing Seniors Housing for America

# THANK YOU



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