



Association of Section 3 Professionals

## Question:

*"I have a question for the Section 3 listserv. We recently had an audit finding that expressed concerns that our reports do not indicate whether or not the new hires are full time or part time. Has anyone encountered similar questions from HUD, and if so, how are you collecting information on new hire FTE information?"*

## Seattle

When our team submits our annual employee information for the HUD 60002, there is an optional field to include aggregate hours worked, and that field could be an indicator of FTE status. For example, if you had one new hire in a given category and the aggregate hours equaled 2080, that would represent one full time FTE. However, if you indicated one new hire and 1040 hours, it would represent one half time FTE.

## Los Angeles

We use a Resident Certification Form (attached) which asks for number of hours worked. We can from there conclude if the new hire is full time or part time. However, please note that the annual HUD 60-0002 report does not require agencies to submit such data. It is optional to provide the aggregate number of hours worked. If still feasible, I'd suggest to revisit that issue with the auditors to remove that finding.

Your question raises another question as to how HUD defines full-time. Current CFR does not provide a definition and in the proposed rule it was states as "A person who works at least half the hours (50%) of the average staff hours worked for the job category for which the person was hired throughout the duration of time that the work is performed on the covered project." Until the new rule is approved, we are in the dark as to what counts for new hire and if the agencies can or cannot count new hires who work on small projects for couple of days only.

## Birmingham

As defined, a new hire is to be considered a full-time worker. Workers who are at a part-time status should not be counted in your new hire numbers. You can have full time seasonal or temporary status.

## HUD

New hires must be full time, either permanent or temporary. An indication of staff hours worked is optional on Form HUD 60002.

### 24 CFR § 135.5 Definitions

*New hires* mean full-time employees for permanent, temporary or seasonal employment opportunities.

**Note:** In current regulations, "full time" employment is not defined, however, many consider 40 hours per week/8 hours per day/ 2080 hours per year as the standard.