

## Hill, Ronald M

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**From:** Bill Brauner <BBrauner@cedac.org>  
**Sent:** Friday, April 26, 2019 9:33 AM  
**To:** Hollar, Michael K  
**Cc:** Guido, Anna P; Hill, Ronald M  
**Subject:** RE: FR-7007-N-08 60 Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties

Mr. Hollar,

I appreciate your detailed responses to my comment.

Best regards,

Bill Brauner  
Director of Housing Preservation and Policy  
617-727-5944 x115

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**From:** Hollar, Michael K [mailto:Michael.K.Hollar@hud.gov]  
**Sent:** Friday, April 26, 2019 9:28 AM  
**To:** Bill Brauner  
**Cc:** Guido, Anna P; Hill, Ronald M  
**Subject:** RE: FR-7007-N-08 60 Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties

Mr. Brauner,

Thank you for your comments on HUD's Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties. Your letter discussed five suggestions which are addressed in turn below. Please note that HUD must balance the benefit of requesting new information against the cost to the HFAs of providing that information. Importantly, not all HFAs have the same capacity to provide information and thus, as we have experienced when adding new questions in the past, many agencies may not be able to provide information in new fields for several years or the information may not be provided complete for the properties submitted.

*Total Length of Affordability Period:* HUD agrees that this is useful information and that the information is likely easy for HFAs to provide. Thus, the property form will not only ask if the affordability period is longer than the federal minimum, but also how long.

*Qualified Contract Waiver:* HUD understands that knowing whether a developer waived the right to a Qualified Contract and, if so, how long it has waived this right may be useful for preservation advocates, but has decided not to include this question. Many HFAs have minimal staff who have very limited time to respond to HUD's data collection request. In addition, much of the information provided on the property form are not in systems but rather assembled from applications, which is labor-intensive to provide.

*Units Set Aside Below Elected Rent/Income Ceiling:* Since actual rent information is provided with the tenant data, HUD will seek to incorporate more of the information submitted as part of the tenant data into the property database. The rent level is one area HUD will consider aggregating to include in the property database.

*Rental Assistance Demonstration (RAD) Properties and Housing Trust Fund (HTF) Financing:* HUD agrees that since the Rental Assistance Demonstration (RAD) and the National Housing Trust Fund are becoming important resources for LIHTC development, we should inquire about their use. Thus, we have added a field for the National Housing Trust Fund in Part VIII Program Type on the tenant form and both of these programs in the list of financing options in the property form.

Thank you again for taking the time to provide comments on this data collection effort!

Sincerely,  
Michael Hollar  
Senior Economist  
Office of Policy Development & Research (PD&R)

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**From:** Bill Brauner <[BBrauner@cedac.org](mailto:BBrauner@cedac.org)>  
**Sent:** Tuesday, March 26, 2019 10:28 AM  
**To:** Guido, Anna P <[Anna.P.Guido@hud.gov](mailto:Anna.P.Guido@hud.gov)>  
**Subject:** FR-7007-N-08 60 Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties

Dear Ms. Guido,

CEDAC would like to submit the attached comment to the above referenced Notice of Proposed Information Collection. I was not able to submit this comment at Regulations.gov. Could you please confirm that email is an acceptable form of transmission, or alternately direct me to a different method of submitting the comment electronically?

Thank you,

Bill Brauner  
Director of Housing Preservation and Policy  
Community Economic Development Assistance Corporation  
18 Tremont Street, Suite 500  
Boston, MA 02108  
617-727-5944 x115



EXTERNAL SENDER

## Hill, Ronald M

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