

April 10, 2019

Anna P Guido
Reports Management Officer, QDAM
Department of Housing and Urban Development
541 7th Street SW, Room 4176
Washington DC 20410-5000
Sent via email: anna.p.guido@hud.gov

RE: Docket No FR-7007-N-08, "60-Day Notice of Proposed Information Collection: Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties"

Dear Ms. Guido,

Minnesota Housing appreciates the opportunity to provide comments on the proposed revisions to the Tenant and Property LIHTC database data collection forms. We are the primary tax credit allocator for the state of Minnesota. Our comments are organized by the Property and Tenant collection forms.

Property data collection form

- We appreciate adding collection information regarding opportunity zone funds, however would appreciate a period of time, six months would be reasonable, to alter our internal systems to gather this data before it is required to be submitted.
- While we recognize having reasoning for why a property is no longer monitored for LIHTC compliance in the data may be valuable information, we do not at this time have a mechanism to historically review older tax credit properties no longer monitored and provide this detail. If it's intended for properties that leave monitoring going forward, we would need time to alter our internal systems to gather the data and suggest a ramp up period similar to the above comment.

Tenant data collection form

- For the new information requested for income averaging, and for adding county, we are able to complete this information but request a reasonable ramp up time to allow for altering our internal systems.
- Regarding *Part VIII: Program Type*, we don't monitor some of the programs listed so many not have complete information. For example, we don't monitor local housing programs so would not have 100% accuracy on whether there is one of those sources in the properties. Also, we recommend adding the National Housing Trust Fund resources to this list.

Thank you again for the opportunity to comment. If there are any questions about these comments, please contact me at 651-297-3120 or by email at jessica.deegan@state.mn.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Deegan', written in a cursive style.

Jessica Deegan

Director of Federal Affairs

Hill, Ronald M

From: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Sent: Friday, April 26, 2019 9:49 AM
To: Hollar, Michael K
Cc: Guido, Anna P; Hill, Ronald M
Subject: RE: Comment re: Docket No FR-7007-N-08

Thanks, we appreciate you providing these comments back to us!

From: Hollar, Michael K [mailto:Michael.K.Hollar@hud.gov]
Sent: Friday, April 26, 2019 8:32 AM
To: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Cc: Guido, Anna P <Anna.P.Guido@hud.gov>; Hill, Ronald M <Ronald.M.Hill@hud.gov>
Subject: RE: Comment re: Docket No FR-7007-N-08

Hi Jessica,

Thank you for your comments on HUD's Statutorily-Mandated Collection of Information for Tenants in LIHTC Properties. I greatly appreciate feedback from the housing finance agencies that submit this information to HUD as this insight helps us understand the burden and ability to provide the requested information. Your letter discussed four suggestions which are addressed below.

With regard to allowing additional time to alter internal systems for new fields in both the property and tenant collection forms, we plan to make the new fields optional in the first year. Allowing additional time has been our policy each time we have added new data fields. Additional time is granted to allow HFA's to alter their internal systems and their own data collection forms. Further, specific to Qualified Opportunity Zone information, HFAs will have more than a year before properties located in Qualified Opportunity Zones will be requested within this data collection. Thus, the earliest a property could receive Qualified Opportunity Zone funds is 2019. HUD will not collect information on properties placed in service in 2019 until the fall of 2020.

We also understand that HFAs are often unable to provide data in newly added fields for previously reported LIHTC properties. Data for newly added fields is not required for previously reported properties. HUD certainly appreciates this type of historical data, but understands that it may be too burdensome or simply not possible to provide.

Finally, we agree that since the National Housing Trust Fund is becoming an important source of funds for LIHTC development, we should inquire about its use. Thus, we have added a field in Part VIII Program Type on the tenant form and in the list of financing options in the property form.

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

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

From: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Sent: Wednesday, April 10, 2019 1:46 PM
To: Guido, Anna P <Anna.P.Guido@hud.gov>
Subject: Comment re: Docket No FR-7007-N-08

Please find our comments attached for the proposed information collection revisions.

Thank you,
Jessica

Jessica Deegan

Director of Federal Affairs | Policy and Community Development

Minnesota Housing

400 Wabasha Street North, Suite 400 | St. Paul, MN 55102

Direct: 651.297.3120 | Main: 651.296.7608

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Hill, Ronald M

From: Hollar, Michael K
Sent: Friday, April 26, 2019 9:32 AM
To: jessica.deegan@state.mn.us
Cc: Guido, Anna P; Hill, Ronald M
Subject: RE: Comment re: Docket No FR-7007-N-08

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Sent: Wednesday, April 10, 2019 1:46 PM
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Jessica Deegan

Director of Federal Affairs | Policy and Community Development

Minnesota Housing

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Hill, Ronald M

From: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Sent: Thursday, February 14, 2019 10:20 AM
To: Hollar, Michael K
Cc: Guido, Anna P; Hill, Ronald M
Subject: RE: Forms for Docket No. FR-7007-N-08

Many thanks!

From: Hollar, Michael K [mailto:Michael.K.Hollar@hud.gov]
Sent: Thursday, February 14, 2019 9:11 AM
To: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Cc: Guido, Anna P <Anna.P.Guido@hud.gov>; Hill, Ronald M <Ronald.M.Hill@hud.gov>
Subject: RE: Forms for Docket No. FR-7007-N-08

Hi Jessica,

The proposed forms for HUD's LIHTC data collection are attached. The parts that have changed are highlighted in yellow. Let me know if you have any questions.

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

From: Deegan, Jessica (MHFA) <jessica.deegan@state.mn.us>
Sent: Thursday, February 14, 2019 9:44 AM
To: Guido, Anna P <Anna.P.Guido@hud.gov>
Subject: Forms for Docket No. FR-7007-N-08

Good morning,
Could you please send me the proposed forms or other available information pertaining to the 60 day notice of proposed information collections; Statutorily Mandated Collection of Information for Tenants in LIHTC properties.

Thank you!
Jessica

Jessica Deegan
Director of Federal Affairs | Policy and Community Development

Minnesota Housing
400 Wabasha Street North, Suite 400 | St. Paul, MN 55102
Direct: 651.297.3120 | Main: 651.296.7608

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