

Hill, Ronald M

From: Hollar, Michael K
Sent: Friday, April 26, 2019 9:51 AM
To: Scot Keller
Cc: Dirk Wallace; Guido, Anna P; Hill, Ronald M
Subject: RE: LIHTC Working Group Comment Letter on HUD's Revisions to LIHTC Data Collection

Scot,

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 submitted properties.

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 to time to provide comments on this data collection effort!

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

From: Scot Keller <Scot.Keller@novoco.com>
Sent: Friday, April 12, 2019 5:03 PM
To: Guido, Anna P <Anna.P.Guido@hud.gov>; Hollar, Michael K <Michael.K.Hollar@hud.gov>
Cc: Dirk Wallace <Dirk.Wallace@novoco.com>
Subject: LIHTC Working Group Comment Letter on HUD's Revisions to LIHTC Data Collection

Hello,

On behalf of the LIHTC Working Group, please find attached our comment letter on HUD's proposed revisions to LIHTC data collection.

Thank you for the opportunity to comment on this matter.

Please let us know if you have any questions.

Best regards,



Scot Keller, CPA

Manager

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