

**Subcommittee Members:**

- Gloria Lewton, Clackamas County
- Tonya Evans, OHCS
- Louise Lauman, PDC
- Amanda Gross, Guardian Management
- Maggie Campbell, Income Property Management
- Jonathan Baker, Marion County Housing Authority
- **Staff:** Molly Rogers, HDC and Margaret Mahoney, TACS

**Subcommittee Operating Assumptions:**

1. Property managers expressed willingness to submit more data each year if it meant only reporting it once.
2. Creating a separate location to enter static, project summary data would eliminate duplicative project summary data in each of the current tenant level reports due to the reliance on paper copies. Streamlining the static data would reduce a significant amount of time in reporting this information on a continual basis.
3. Eliminate data fields that are better aligned in a different report/location, such as static project summary data or inspection information.

**Subcommittee Recommendations to Funders Workgroup:**

1. **Adopt a statewide common reporting format for tenant level data that would meet the annual compliance needs of federal and state funding sources.**

A statewide common reporting format would replace the current Participating Jurisdiction's HOME monitoring report, OHCS's Certificate for Continuing Compliance (CCC) and HOME monitoring report, and would supplant a portion of the Portland Development Commission's Electronic Tenant Survey (ETS). It does not eliminate each jurisdiction's monitoring responsibility to conduct file reviews, conduct back-end analysis to determine compliance, and extract additional data or reports during the management review and site visit process. This reporting format is oriented to streamlining the reporting obligation of owners and managers.

A common reporting format means that owners and managers would only have to adhere to a single structure to submit tenant, rent, income, subsidy, and utility allowance data, thereby eliminating significant time in translating different data sets in various formats, particularly for those projects that receive both tax credits and HOME funds. This reporting format also lays the foundation for the possibility of a single administrative entity collecting and/or analyzing the tenant level data on behalf of other funding jurisdictions.

This reporting format represents the recommended data fields; there could be possibility of fewer data elements if the technology existed to do more calculations and formulas on the back-end. There was agreement to move to a unit based tenant report that tracks the movement of the households over the course of the year, thereby eliminating additional vacancy reports by some of the jurisdictions. Additional data fields for specific local jurisdictions could be tracked in a separate, supplemental form, such as more detailed household demographic data required on the ETS.

**Recommended reporting format would include the following data fields:**

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- **Building ID Number (BIN)** – to connect the building to the units
- **Unit #** - for all units in project
- **Type of HOME** – fixed-high, fixed-low, floating-high, floating-low, N/A
- **Number of bedrooms**
- **Resident name** – last, first initial, manager unit, vacant, market rate (instructions would have to provide direction for data requirements on the managers, market, and vacant units)
- **Household size at move in**
- **Move in date**
- **Move out date**
- **Unit transfer?** (If yes, list unit # household came from)
- **Most restricted income limit at move in** – in dollar amounts, not percentages, due to the differing Median Family Income calculations with HUD’s hold harmless ruling and HERA implementation
- **Gross annual household income at move in** – to compare to most restricted income limit at move in
- **Gross annual income at first-year certification** - compare this to income at move in for LIHTC compliance monitoring
- **Current household size**
- **Effective date of current certification** - for projects with HOME, Risk Share, Section 8, RD, etc. that require annual certification (formal or self-cert.)
- **Gross current annual household income** – 140% rule could be tracked on the back-end
- **Most restrictive rent limit with utilities**
- **Current utility allowance** (enter \$0 if owner-paid)
- **Current maximum tenant rent allowed** (rent limit – utility allowance) – could be back-end calculation
- **Actual rent charged**
- **Current tenant portion**
- **Current rent subsidy portion**
- **Rent subsidy type** – TB Section 8, PB Section 8, Other

**What the recommended reporting format does not include:**

Modifications may be made to the reporting format once HUD releases its final guidelines for HERA compliance this winter. More clarifications are needed from HUD to determine length of monitoring for HERA projects. The State is anticipating that HUD could request more detailed household demographic data. The reporting format would need to be adjusted to meet HUD’s new standards.

Full-time student status verification will be evaluated through file reviews of the Tenant Income Certification form. Race and ethnicity categories are not included in the annual reporting format due to HUD’s requirement that this only needs to be collected once at project start-up. However, some local jurisdictions may opt to extract this and other detailed demographic data through other means, such as a supplemental annual form or sampling of files, for policy and planning purposes.

The detailed household demographic data fields on the ETS that are not included in the common reporting format are:

- # of adults
- # of children under 18

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- # of children under 7
- Race and ethnicity
- Special needs?
- Senior
- PSH?
- # of female heads of households
- # of male heads of households

Demographic data requirements will be reevaluated once HUD releases its final guidelines for HERA.

**2. Consolidate the three versions of the Tenant Certification Income (TIC) (general, HOME, and tax credits) into one. Make slight modifications to the TIC meet the needs of the multi-layering of income and rent restrictions from various funding sources.**

Because most the data summarized in the recommended tenant reporting format is collected on the TIC, the subcommittee determined that it made sense to review the TIC as a part of this process. The subcommittee recommended that slight variations to the three TICs could easily lend itself to one. This would eliminate written-in notes from property management to ensure that all program types are tracked on a single sheet.

To consolidate to one TIC and to make the flow of data consistent with the consolidated tenant reporting format, the subcommittee recommends that the Part VIII: Program Type in the current TIC be moved to before Part V: Determination of Income Eligibility since the program types determines which rents and income levels are deemed most restrictive for the unit. Providing data on the actual tenant income and the unit’s rent restrictions better flows after the program type. In addition, the subcommittee recommends a modification to the Program Type section to streamline across more funding sources. This section should include two tables that better distinguishes the income and rent restrictions by program, which in many cases, references the funding source that sets the limits. Two tables will allow clear reporting for projects that have different rent limits from its income restrictions.

The subcommittee recommends including the following two tables in the Program Type section. Owners and managers would simply check off

Program Name	MFI% Rent Restriction				
	0-30%	40%	50%	60%	80%
LIHTC					
HOME					
AHDP					
Tax Exempt					
Section 8					
Others					

Program Name	MFI% Income Restriction				
	0-30%	40%	50%	60%	80%
LIHTC					
HOME					

AHDP					
Tax Exempt					
Section 8					
Others					

**3. Explore coordination of site visits for file reviews**

Similar to the inspections subcommittee, multiple jurisdictions and funders visit the properties annually or on a periodic basis to conduct file and management reviews. A significant portion of the site visit is spent reviewing and photocopying a sampling of tenants’ files and records, generally to verify income and monitor compliance with other property management and leasing provisions. Most funders are generally collecting and analyzing the same documents.

There are a number of strategies to achieve efficiencies in time and costs for file reviews for both the funders and the owners/managers. Funders could coordinate scheduling for site visits to reduce the number of visits from multiple entities over the course of the year. Funders could request specific files to be sent to them electronically to either: 1) save time during the site visit during the compilation process or 2) conduct income certification monitoring from a centralized location, thereby, eliminating the need for the site visit for tax credit compliance. One funder could do this on behalf of another funder, or the administrative entity could request color scanned documents from the owners/managers directly. This could create significant time savings from reducing the number site visits per funder, particularly in remote areas. The second approach would require additional research to ensure that color scanning could replace the need to review original documentation.

In Washington State, the housing finance commission, which oversees compliance for the low income tax credit program, receives income certification documentation electronically and is able to conduct its income certification in the home office. They coordinate with local Participating Jurisdictions and in some cases, the State Commerce, Trade, and Economic Development agency (CTED) to collect these files on their behalf.

These strategies need to be further deliberated on the subcommittee level while discussing other implementation steps and challenges.