



MANAGEMENT BULLETIN #506

DATE: August 4, 2020

TO: Owners/Agents of Properties Assisted with Federal LIHTCs

CC: Asset Management Department Staff

FROM: Asset Management Department, IHDA

RE: LIHTC Program Regulatory Relief

SUMMARY:

Effective July 1, 2020 the IRS has delivered far reaching regulatory relief in response to the COVID-19 pandemic, as outlined in [IRS Notice 20-53](#). Many of these measures were advocated by the National Council of State Housing Authorities on behalf of monitoring agencies including IHDA.

Key provisions of the Notice assist Property Managers as follows:

Income Re-certifications: Property owners and agents are not required to perform income re-certifications during the period from April 1- December 31, 2020.

This waiver does not apply to initial certifications for new move ins. Owners/agents may still be required to complete certifications if required by other programs.

Owners/agents must resume performing income re-certifications after December 31, 2020.

Inspections and File Reviews: Monitoring agencies such as IHDA are not required to conduct compliance monitoring inspections or reviews in period from April 1 - December 31, 2020.

As allowed by the IRS, IHDA will suspend monitoring inspections and tenant file reviews for the remainder of 2020.

Agencies must resume inspections and reviews after December 31, 2020. IHDA will advise regarding any protocols for on-site visits in advance of them resuming to ensure the safety of IHDA staff, property owner/agent staff, and tenants.

Restricted Access to Common Areas Common areas that are temporarily closed during some or all of the period from April 1 to December 31 will not be considered a cause for noncompliance nor result in a reduction of eligible basis, provided the closure is in response to the COVID-19 pandemic, and not because of other non-compliance.

Emergency Housing for Essential Workers Owners/agents may treat medical personnel or other essential workers providing services during the COVID-19 pandemic as displaced

individuals and may therefore provide them with emergency housing.

Individuals housed under this provision do not need to be income qualified, and do not need to enter a 12 month lease, for a temporary period.

However, owners/agents must obtain IHDA's written approval to provide emergency housing under this provision. Owner/agents should contact their IHDA Asset Manager to request approval.
