

COMPLIANCE NEXT STEPS MEETING

- Ensure all parties responsible for compliance of OHFA-funded properties are aware of federal and state regulations. The meeting fosters partnership between OHFA and property contacts.
- *Before placing the project in service*, the owner/management agent must schedule the next steps meeting based on these timeframes:
 - **New Construction and HDAP:** It minimum must be held no later than OHFA being notified that the property is at 50% construction completion. May be held earlier when needed.
 - **Acquisition/Rehab Projects:** Generally within 3 weeks of notification of the ownership transfer.
- OHFA's Multifamily Training and Technical Assistance team will schedule the meeting with the owner entity and other parties generally within 45 days of OHFA being notified.
- A developer or owner agent(s) who fail to attend a Compliance Next Steps Meeting will not be issued IRS Form 8609 and may be placed in Not in Good Partnership Status with OHFA.
- Review the [Compliance Next Steps policy](#) for additional details.

COMPLIANCE TRAINING

- Starting with the 2016-2017 QAP, a representative of the owner and/or management company is required to attend the tax credit training once every 2 years. This training can be completed through OHFA or other organizations.
- The Compliance Policies and Regulations Training is a new course that offers:
 - Information on OHFA policies, overview of multifamily programs, best practices, Violence Against Women Act (VAWA), tenant forms, recordkeeping and verifications.
- The Training and Technical Assistance team continues to add additional training materials and course offerings.
- Review the [Training and Technical Assistance webpage](#) for more details on current offerings.

DEVCO

- DevCo is OHFA's online database system that allows organizations working with OHFA to manage and enter information about their projects and respond to site audits.
- There are two areas for ongoing record keeping in DevCo; Compliance and Inspection.
 - DevCo Compliance is used to generate Tenant Income Certifications (TICs), record Utility Allowances and submit yearly tenant data and Annual Owner Certification (AOC).
 - DevCo Inspection allows OHFA compliance staff to conduct physical audits using tablets and also allows the owner and/or management agents to respond to review reports directly into DevCo Inspection.
- **Owners must request access** to the property at minimum 2 months prior to qualifying residents. Owners can approve access for others. Owners ensure property managers and the appropriate on-site staff have access to, and are registered, in DevCo.

- The owner or developer must have the building and unit breakdown information ready to share with OHFA.
- Review the [Accessing and Registering](#) or [Viewing and Adding Additional Projects](#) sections of the DevCo Compliance User Guide for details on steps to access DevCo.
- Once access has been granted, the owner should verify that the buildings and units are correctly set up within DevCo.
- If access is needed for DevCo Inspection, contact the DevCo Helpdesk for access. By default the owner will have access to DevCo Inspection.
- Issues with DevCo Compliance or Inspection should be submitted to the [DevCo Helpdesk](#).

PROPERTY REVIEWS

- OHFA uses the Uniform Physical Conditions Standards (UPCS) to conduct site inspections.
- Review sample and frequency varies based on funding:
 - Based on the final rule issued February 26, 2019, the IRS requires reviews of tenant files/units based on the sample chart and 100% of the buildings once every 3 years and within 2 years of placing in service. The chart listed below shows the required unit sample size.
 - HOME requires that a reasonable sample is reviewed on a 1-3 year review cycle and the lease-up inspection must occur within 120 days of HDAP closeout.

Number of Low-Income Units in the Housing Project	Number of Low-Income Units Selected for Inspection or File Review (Minimum Unit Sample Size)
1	1
2	2
3	3
4	4
5-6	5
7	6
8-9	7
10-11	8
12-13	9
14 - 16	10
17 - 18	11
19 - 21	12
22 - 25	13
26 - 29	14

Number of Low-Income Units in the Housing Project	Number of Low-Income Units Selected for Inspection or File Review (Minimum Unit Sample Size)
30 - 34	15
35 - 40	16
41 - 47	17
48 - 56	18
57 - 67	19
68 - 81	20
82 - 101	21
102 - 130	22
131 - 175	23
176 - 257	24
258 - 449	25
450 - 1461	26
1462 - 9999	27

- OHFA utilizes DevCo Inspection software for conducting physical inspections and generating review reports. OHFA staff will conduct reviews utilizing a tablet and have the ability to issue Exigent Health and Safety (EHS) violations electronically.
- Corrections must be submitted through DevCo Inspection for each finding individually.
- **Owners will have 60-days to submit corrections of review findings.**

ORGANIZATION ONBOARDING

- This program is for ownership entity and/or property management company that are new to OHFA (i.e. never received OHFA funding) or have little to no experience with OHFA multifamily programs OHFA requires completion of the Onboarding Program. Onboarding may be needed at any point of the life of a property.
- The Onboarding Process is comprised of a training program and at least one partner meeting.
- It is at OHFA's discretion to determine which entities involved with a property will be required to complete the onboarding program.

OHFA HOME FUNDED PROJECTS

- Required to submit HOME Rent and Fee Approval on an annual basis
 - HDAP recipients must certify that the HOME rent used at the subject property will not exceed the maximum HOME limits as published by HUD.
 - This is a requirement from the 2013 Final HOME Rule amends §92.252(f)(2) to require that a PJ (The Ohio Housing Finance Agency) must review and approve rents for each HOME-assisted rental project each year.
 - Mandatory fees or surcharges to tenants in HOME assisted units must be approved by OHFA.
- PHA Utility Allowance exclusion on HOME funds committed on or after August 23, 2013 only.
 - The 2013 Final HOME Rule issued by HUD requires PJs (OHFA) to determine an individual utility allowance for each HOME rental project either (1) by using the HUD Utility Schedule Model or (2) by otherwise determining the allowance based upon the specific utilities used at the project. PHA estimates or other estimates that are not project specific are no longer acceptable.

OHIO RENTAL ASSISTANCE PROGRAMS

- The Ohio 811 Project Rental Assistance (PRA) Program (811 Program) is a project-based rental subsidy demonstration funded by HUD.
 - 811 units can be part of new and existing multifamily housing that receive Low-Income Housing Tax Credits (HTC) with OHFA.
 - Rental assistance covers the difference between 30% of the tenant's income and the unit's 50% AMGI rent level calculated for the HTC program.
 - Non-elderly (ages 18-61) individuals with disabilities who are eligible for Medicaid are eligible for the 811 Program.
 - The 811 Program is a partnership between HUD and OHFA. OHFA partners with The Ohio Department of Medicaid, the Ohio Department of developmental Disabilities and the Ohio Mental Health and Addiction Services to carry out the program.
 - OHFA administers the rental subsidies, identifies and qualifies the properties and manages the program waitlist through SocialServe. ODM, DODD and OhioMHAS provide referrals, outreach and marketing to Ohio's prioritized populations.
 - To initiate the tenant referral process projects being built must give notice 90 days prior to placing in service. For existing properties, notice must be given once a vacancy is anticipated for an 811 eligible unit.

- Notices and questions may be sent to 811Program@ohiohome.org.
- For more information review the [Ohio 811 Project Rental Assistance Program](#) webpage.
- The Ohio Department of Medicaid Subsidy Demonstration (ODMSD) is a partnership between The Ohio Department of Medicaid (ODM) and the Ohio Housing Finance Agency to expand affordable housing opportunities to persons with disabilities.
 - Targets extremely low-income people with disabilities who are exiting facility-based settings and require accessible housing.
 - Provides a fifteen year operating subsidy for accessible units developed under the 2016, 2017 and 2018 Qualified Allocation Plans (QAP).
 - Persons at least 18 years old with disabilities who are eligible for Medicaid are eligible for the ODMSD Program.
 - OHFA will make awards and administer the operating subsidies to owners and eligible multifamily rental properties funded through the housing credit program.
 - The operating assistance covers the difference between 30% of the tenant's income and the unit's 50% AMGI rent level calculated for the Housing Tax Credit program.
 - OHFA will operate a referral network that will connect individuals with the ODMSD units.
 - Notices and questions may be sent to MedicaidSubsidy@ohiohome.org.
 - For more information review the [Ohio Department of Medicaid Subsidy Demonstration](#) webpage.

PROJECT CHANGES

- Throughout the operational life of a property, owners may decide to change property management companies, sell their interests, or seek financial relief from deep rent skews enforced through the restrictive covenant.
- OHFA must review all such requests from current owners
- Such requests that occur after the property is placed in service are reviewed by the Asset Management Team in the Office of Multifamily Investments. Questions or requests may be sent to OHFAProjectChanges@ohiohome.org.

For more information review the [Asset Management and Project Changes](#) webpage.