

Q1: How long is the original lease term for a HOME unit?

Answer:

The original lease term must be at least one year in length.

Q: I have a household that is marked as a HOME unit. During a recent compliance review, the household's employment income was not properly verified even though the HUD 4350.3's advice of 4-6 pay stubs should be used. Why is this a noncompliance event?

Answer:

HUD 4350.3 indicates that 4-6 pay stubs is enough to verify employment income for the various HUD programs and for the LIHTC program. The 2013 Final HOME regulation (**24 CFR 92.203**) requires the use of income source documentation for HOME- assisted units of two months of pay history such as paystubs **{92.203 (a) (1) (i) & (a) (2)}**. In some circumstances, 4-6 pay stubs may cover this, however, if a household is paid weekly, even with 6 pay stubs there would not have been enough 'proof' for the HOME program rules. In this instance, the owner and/or management agent should contact OHFA for further guidance.

Q: For properties with both HOME and housing tax credits, are the inspections conducted separately?

Answer:

No. For properties that have both LIHTC and HOME funds allocated by OHFA, the reviews are conducted simultaneously. The IRS requires Housing Finance Agencies (HFAs) to conduct an on-site inspection at least once every three years. The on-site monitoring schedule for projects funded with LIHTC and HOME may vary between 1, 2 or 3 years.

Q: The HOME program has a recertification schedule that has to be followed. How can I keep it straight in order to avoid non-compliance?

Answer:

With the HOME program, owners should conduct annual recertifications but the type of certification varies as to where the certification is in its cycle. Full third-party recertifications must be completed every six years. On the in-between years, OHFA allows the household to complete a self-certification. For all certifications, regardless if they are 3rd party or a self-certification, all household members age 18 or older must complete an OHFA Sworn Income and Asset Statement, an OHFA Student Certification and a Tenant Income Certification.

For properties allocated HOME funds prior to 2014, the certification schedule is tied to the date the unit was qualified as a HOME unit.

For properties allocated HOME funds in 2014 and after, the recertification schedule is tied to the property as far as the six-year cycle goes. Following is an example of a property that was allocated HOME funds in 2014 with a resident that became a HOME unit in 2017. Notice how they 'fall' into the property's six-year cycle:

Year of Cycle	Type of recertification	Calendar Year	New HOME unit
1	3rd party	2014 <i>(IDIS start date)</i>	
2	self	2015	
3	self	2016	
4	self	2017	3 rd Party
5	self	2018	Self
6	3rd party	2019	3 rd party
7	self	2020	self
8	self	2021	Self
9	self	2022	Self
10	self	2023	Self

Q: I have a LIHTC property that is in extended use, year 15 or older, and has HOME funds. What must be included in the files?

Answer:

In extended use for the LIHTC program, OHFA relaxes some of the review requirements and does not monitor for the LIHTC student rule or the Next Available Unit Rule. For households that are simply LIHTC households, you would want to ensure that you have the correct household composition, the correct rent and the correct UA. If the unit is qualified for both LIHTC and HOME, in addition to the information above the household would have to be recertified annually for both income and student status using the OHFA Sworn Income and Asset Statement and OHFA Student Status Certification. It is imperative owners and/or management agents are familiar with the requirements including the affordability period as outlined in the HOME funding agreement to ensure the property remains in compliance.

Q: I have a resident that is 25 years old, attending school part-time working on a degree. They are also not employed and only receiving gift income. Can the resident remain in the unit?

Answer:

A: The HOME program follows the student eligibility requirements as outlined by **HUD student rule.**

Student eligibility is determined at move in/initial certification and at each annual certification. Student eligibility may also be reviewed at interim certification if student status has changed since the last certification. All students are required to report any change in their student status. This student who is enrolled as a part time student at an institute of higher education for obtaining a degree, certificate, or other program leading to a recognized educational credential is eligible based on meeting the requirement of at least 24 years old.