

# AHMA / CTCAC Collaboration Working Group Notes

Wednesday, August 14, 2019

**Location:** Terracina Meadows - 4500 Tynebourne Street, Sacramento, CA 95834

## Participants:

**CTCAC** – Shannon Nardinelli, Elizabeth Gutierrez

**UFI** – Raette Frazier

**AHMA-NCH** – Ricardo Pacheco – John Stewart, Megan Underwood – USA, Evelyn Catalan – MidPen, Joanna Yong – Bridge Housing, Felicia Scruggs, Susan Ruan – Human Good (phone)

**AHMA-PSW** – Sue Silva – TSA Housing, Angelique DeSilva – Telecu, Irene Taylor – RPK (on phone)

*The purpose of this AHMA group is to create an ongoing dialogue with CTCAC in order to address mutual concerns - Common goals of this collaboration group is to problem solve, increase the effectiveness of all parties, and move the affordable housing industry forward by providing standardized policies, procedures and forms, generated by the industry, and available to all members - Increase compliance on the part of the owners/agents - Reduce time and energy by CTCAC to address common issues - Assist CTCAC in the event of increased workloads*

[With Post Meeting Updates](#)

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## Updates from CTCAC

1. New Director, [Judith Blackwell](#) will be sworn in next week (August 2019)
2. Interviews will start late August for Chief for the Compliance Section (Rose's position) for CTCAC
3. The new director will focusing on regulations and streamlining regulations
4. CTCAC had an IRS audit that caused some changes to practices
  - a. Casualty losses must be reported immediately (if one day of loss)
  - b. CTCAC Must report level one physical findings now.
  - c. Changes will start with all August inspections
5. Basic Workshops registrations opened in Southern California (almost fully booked)
6. Mayra is the new Ammer
7. Per CTCAC you can switch between the CUAC and PHA Utility Allowance method after it has been in service for one year. Can switch no more than once a year.
8. KinGap (HUD does not count) CTCAC requires that it be counted. Shannon and Elizabeth to confirm that it will continue to be counted. **CTCAC Update** (after meeting): [KinGap will now be excluded for tax credit purposes.](#)
9. CTCAC has removed the marital separation form from the CTCAC website. Applicants that are married, but not living together must have the income and assets from their spouse counted unless they can prove that they are legally separated or that they are in the process of divorce proceedings.

- a. CTCAC to provide direction on how to handle marital separation income and assets during situations of VAWA and deportation of spouse. **CTCAC Update** (after meeting): – If there is VAWA and documentation can be shown, then the income of the spouse will not be required to be counted for CTCAC purposes. For deportation of a spouse, if household can provide a copy of deportation or similar evidence, then income of spouse will not need to be included for CTCAC.
- b. Will CTCAC issue a memo to provide guidance and notify owners of change? – **CTCAC Update** (after meeting): Yes, a mass email will be sent out in mid-October.

#### General Discussion (attachments)

- 1) Proposed Changes to LIHTC Program introduces to Senate (some major revisions to the LIHTC program).  
**CTCAC Response** – CTCAC cannot respond until proposals have passed.
- 2) HUD Draft electronic signature guidance.  
**CTCAC Response** – CTCAC will continue current policy that electronic signatures are only permitted on applications. CTCAC may reevaluate once HUD guidance is final.

#### Questions/Comments

1. From Ricardo Pacheco, The John Stewart Company –
  - Are we to update CUAC annually? i.e. every month of May.  
**CTCAC** - Yes
  - If we get the report from vendor in May, do we also have 90 days to implement?  
**CTCAC** – You have 90 days from when approved to implement
2. From Evelyn Catalan, MidPen Property Management Corp –
  - Regarding Casualty Losses
    - Can CTCAC confirm the definition of “offline”? We have minor toilet leaks and other minor maintenance mishaps that place a unit offline for a very brief period, as an example.  
**CTCAC** – The unit is determined to be offline”only if the tenant cannot occupy the unit.
    - Do these reporting requirements apply to properties in their extended use period?  
**CTCAC** - Yes. Will keep 60 day grace period practice for the extended use properties.
3. From Evelyn Catalan, MidPen Property Management Corp –
  - During 2018 advanced CTCAC workshop, CTCAC stated that: “IHSS income is excluded per HUD 4350.3 only if it is paid to the tenant for a family member who has a developmental disability, and the family member is living in the unit with the tenant.”  
Is CTCAC looking for 3<sup>rd</sup> party verification on the developmental disability or for verification that the person needs assistance?  
**CTCAC** – Fair Housing has advised CTCAC that owners can ask if the applicant/tenant have a developmental disability, but you cannot ask what type of

disability is. Burden is on owners and owners should address the issue with their Fair Housing attorney.

4. From Sue Silva, Thomas Safran & Associates –

- CTCAC has mentioned in training before that lifetime pension does not have to be re-verified every year. If the initial verification is over 120 days (letter stating lifetime benefit), is that acceptable as well? Is this going to be put in the Compliance Manual?

CTCAC – Owners can use previous a verification if lifetime benefit at recertification. If IC, must be within 120 days or show documented attempts and then can use taxes to show benefit. CTCAC will try to put in manual, cannot put everything in manual.

5. From Sue Silva, Thomas Safran & Associates –

- During re-syndication, does the live-in aide have to be re-verified if it was verified as a permanent disability correctly under the original project?

CTCAC - Can pull forward original verification documentation. Do not have to recertify live-in aide.

6. From Megan Underwood, USA Multifamily Management

- For digital money accounts (PayPal, Venmo, etc.) where do these get listed on the TIC Questionnaire and Under \$5000 Asset form? Will these forms be updated soon to reflect these types of pay?

CTCAC - Put in “Other” section of Under \$5000 or in Checking Account section and note that it is Venmo. List in Checking Account section on TICQ. Can pull six month history of account if over \$5000 to verify balance.