



# Annual LIHTC Compliance Seminar

**October 17, 2023**

**Presented by RI Housing**

**Hosted by IREM, RI Chapter 88**



# Agenda

- **Agency Updates**
- **AIT (Average Income Test policy)**
- **HOTMA overview**
- **LIHTC non-compliance, what really matters**
- **Merging old and new LIHTC projects**
- **Procorem by ProLink Solutions**
- **NSPIRE overview**
- **Q & A**
- **QUIZ**



# Agency Updates

- Rhode Island has a newly created Dept of Housing under the Office of Housing and Community Development
  - Their director, Stefan Pryor is the new chairman of our board
  - They currently have strong focus on homelessness issues
  - We are working closely with them
- We have an open position in RI Housing's Leased Housing Division – Multifamily Housing Compliance manager
  - Until then please reach out to me or your asset manager with any questions
- We have updated and cleaned our [compliance website](#)



# Development

- **We have a new Developers Handbook for 2023**
- **A new QAP is expected in October**
- **Expect to release an RFP for the 9% and ancillary programs in October with an expected due date of mid-December**



# Average Income Test Policy



- The full policy is uploaded on our website
- New final regulations apply to taxable years beginning after December 31, 2023. For taxable years prior to the application of these regulations, taxpayers should rely on RI Housing's original guidance.
- This policy applies only for Projects that have not yet executed an IRS form 8609.
- **The Owner shall lease at least 40% of the units in the development to individuals whose income is 80% or less of area median gross income (adjustments for family size) as determined in accordance with section 42 of the Code (“Low-Income Tenants”) so long as the average income and rent restriction of such units is 60% or less of area median gross income.**
- 100% LIHTC Projects only
- Required to elect to treat each building as part of a multi-building project.
- Must be documented in the Management Plan and Tenant Selection Plan (TSP)



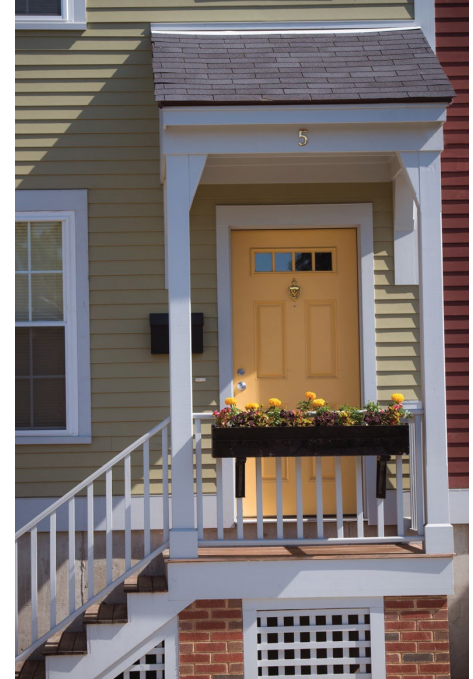
# Average Income Test Policy

- Should a household living in a unit become ineligible under the respective income designation of that unit, and the removal of that unit from the applicable fraction causes the average to exceed 60 percent of AMI across all low-income units, it does not result in a violation of the minimum set-aside as long as 40 percent of the units in the project have an average designation of 60 percent or less with households living in them that are in compliance with those designations.
- The owner must:
  - Keep records and report to RIHousing on unit designation for all units.
  - Identify the AIT units within the qualified group of units that satisfy the AIT minimum set-aside.
- An income qualified tenant may unit transfer within the Project and the same AIT income limitation will follow to the new unit.
- Annual income certifications are required. Waivers may be authorized at RIHousing's discretion.
- Redesignation of units does not require prior RIHousing approval.
- LIHTC compliance monitoring fees will be higher for AIT Projects.



# HOTMA - Changes

- Income inclusions
- Student financial assistance calculations
- Foster rules
- Interim Recert Rules
- Eligibility for those who own homes or have over \$100,000 in assets
- Changes to deductions
- Asset exclusions
- Passbook savings rate cap changes
- EIV report changes



# HOTMA - Things to Think About

## Affected Programs:

- Project-Based Rental Assistance
- HOME
- Housing Trust Fund (HTF)
- Public Housing programs
- Housing Opportunities for Persons With AIDS (HOPWA)
- Section 8 Moderate Rehabilitation SRO program
- Housing Choice Voucher program
- Section 202 and 811 Projects
- Demonstration Programs (RAD)
- Section 202/162 Project
- Assistance Contracts (PACs)
- Senior Preservation Rental Assistance Contracts (SPRACSs)
- Rural Housing Services

- Get trained!
- Update your software
- Update your policies and forms
- Look at who this will affect – specifically real estate and assets rule





# HOTMA - Forms!

- Policies on assets and real estate
- Update Tenant Selection Plan
- Update EIV Policy (IRs)
- Update rejection letter
- Update Application/ Pre-Application
- Potentially update House Rules
- There will be an updated Lease
- There will be an updated 9887
- There will be an updated HUD Fact Sheet
- There will be an updated VAWA Addendum



# HOTMA – Delayed!

- Effective (kind of) January 1<sup>st</sup> 2025
- By March 31, 2024
  - MFH Owners must update their Tenant Selection Plans and EIV policies and procedures to reflect HOTMA rules and discretionary policies.
  - MFH Owners must make the revised Tenant Selection Plan publicly available.

Note: MFH Owners must continue to follow their existing Tenant Selection Plans and EIV policies & procedures until the MFH Owner's software is compliant with TRACS 203A.



# HOTMA – Delayed!

- Once your software is compliant
  - provide tenants at least 60 days' notice that their lease will be modified at the end of the lease term after the expiration of the 60 days' notice.
  - O/As must then begin using the revised Model Leases at the expiration of a family's lease term.
  - O/As must implement their revised Tenant Selection Plans and EIV policies and procedures.
  - All tenant data submissions must comply with the HOTMA regulations. Prior to their first reexaminations under HOTMA, O/As must inform families that their income determinations will be conducted in accordance with the HOTMA final rule.
  - As a best practice, HUD recommends that MFH Owners describe to families how their income determinations will change with the implementation of the final rule.
  - MFH Owners must use the revised Tenant Consent form (form HUD-9887/9887A) and Fact Sheets ("How Your Rent is Determined").



# HOTMA – January 2025

- January 1, 2025:
  - Full compliance with the HOTMA final rule is mandatory effective January 1, 2025.
  - Contractor Administrators will issue HOTMA-related findings during MORs.
  - MFH Owners who fail to implement HOTMA may be found in default of their business agreements with HUD.



# HOTMA - MORs

- Prior to January 1, 2025, MFH Owners will not be penalized for HOTMA-related tenant file errors during Management and Occupancy Reviews (MORs). Instead, the Contract Administrator will issue observations with corrective actions.
- After January 1, 2025 Owners must correct all HOTMA-related observations that were issued by Contract Administrators during 2024.



# HOTMA

- There are still many items HUD needs to clarify or update
- IRS has verbally confirmed its their intention to follow the HOTMA final rule in regards to determining income and assets and will allow for self-certification of assets when the cash value does not exceed \$50,000
- Our tax credit policies will continue to mirror Section 8 as far as income and asset verification is concerned
  - If you can use a verification for section 8 we will accept it for tax credit
  - We will not be making the tax credit program more restrictive in terms of eligibility.





# LIHTC Non-compliance: What really matters?

- **Is the project in the 15-year compliance period?**
- **Did owner/agent discover the non-compliance and report to RIHousing?**
- **Did RIHousing discover non-compliance during a review?**
- **Is the non-compliance due to a disaster, natural or otherwise?**



# LIHTC Non-compliance: What really matters? *(cont.)*

## 17 categories of non-compliance

### Most common:

- Full time student household
- Over income household
- Violations of the Next Available Unit Rule
- Wrong Utility Allowances
- Owner failed to correctly complete or document tenant's annual income certification
  
- Violation(s) of the UPCS or local inspection standards
  
- Owner failed to provide annual certifications or provided incomplete or inaccurate certifications
  
- Changes in Eligible Basis or the Applicable Percentage





# LIHTC Non-compliance: What really matters? *(cont.)*



**A household moved in – 7 years ago, the AM discovers that the rental application is not time/date stamped.**

Noncompliance Y or N?

**Management executed a LIHTC Lease addendum every year without executing a new lease.**

Noncompliance Y or N?

**There is no BIN number on the TICS.**

Noncompliance Y or N?



# LIHTC Non-compliance: What really matters? (cont.)

**Owner fails to pay LIHTC compliance monitoring fees.**

Noncompliance Y or N?

**Owner/agent fails to update WTC/Procorem on a monthly basis.**

Noncompliance Y or N?

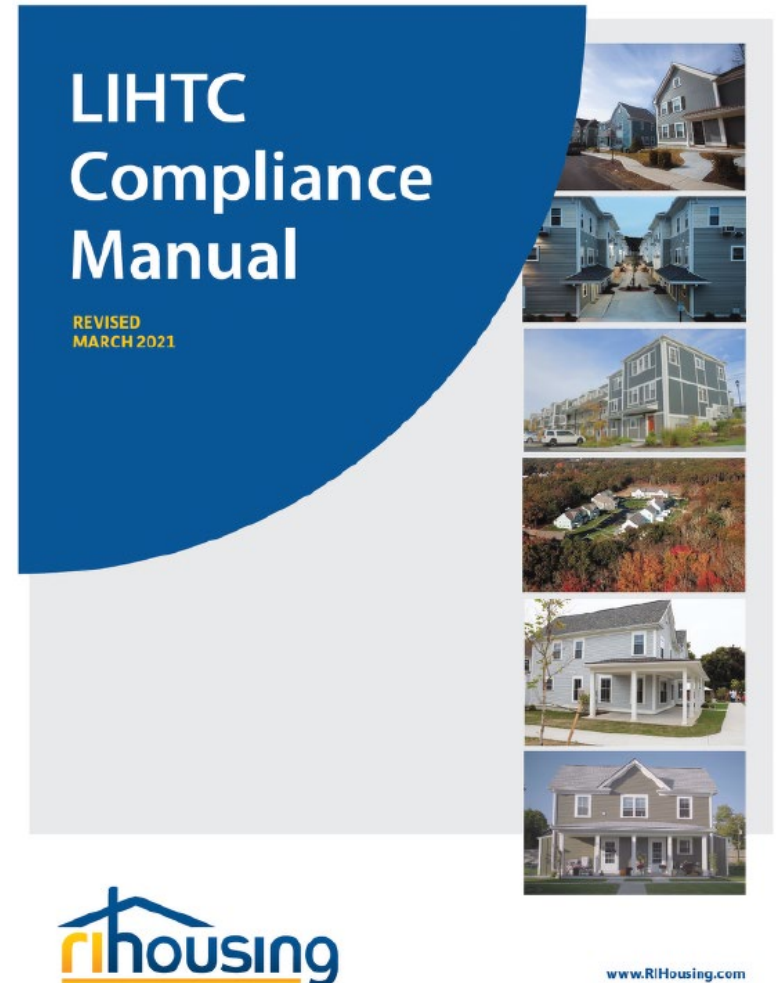
**A vehicle plows through the property and literally crashes into an apartment.**

Noncompliance Y or N?



# LIHTC Compliance resources *(cont.)*

## RIHousing's LIHTC Compliance Manual



## Examples of **NONCOMPLIANCE**

	<b>8823 Guide Chapter</b>
<b>Description</b>	
The household is above the minimum set-aside income limit upon move-in.	<b>4</b>
Late or not-completed annual recertification at properties That are not 100% LIHTC.	<b>5</b>
Violations of UPCS standards.	<b>6</b>
Failure to submit complete annual Owner's Certification of Continuing Program Compliance.	<b>7</b>
Changes in eligible basis (for instance charging inappropriate fees or removing amenities).	<b>8</b>
Failure to keep the number of units in compliance as required by the minimum set-aside.	<b>10</b>
Rents charged over the limit based on the minimum set-aside.	<b>11</b>
Project not available to the general public.	<b>12 &amp; 13</b>
Violations of the Next Available Unit Rule.	<b>14</b>
Violations of the vacant unit rule.	<b>15</b>
Failure to execute the LURA by the time credits are claimed.	<b>16</b>
Units occupied by nonqualified student households.	<b>17</b>
Utility allowance was calculated incorrectly, and as a result, a household is above the federal rent limit.	<b>18</b>
Owner fails to respond to agency notifications of inspection.	<b>19</b>
LIHTC units used on a transient basis (initial leases less than 6 months).	<b>20</b>
Building no longer participating in the LIHTC program.	<b>21</b>

# LIHTC Compliance resources

## IRS Regulations:

### Guide for Completing Form 8823, Low-Income Housing Credit Agencies Report of Noncompliance or Building Disposition

The scope of this guide is limited to guidelines for preparing Form 8823 for submission to the IRS. Taxpayers are responsible for evaluating the tax consequences of noncompliance with IRC §42.

#### Audit Technique Guide

This material was designed specifically for training purposes only. Under no circumstances should the contents be used or cited as authority for setting or sustaining a technical position.



Department of the Treasury  
Internal Revenue Service

publish.no.irs.gov

Training 23092-001  
(Rev. 01-2011)

#### Internal Revenue Service, Treasury

#### § 1.42-5

(e) *Effective date of regulations.* The provisions of §1.42-2 are effective for buildings placed in service by the taxpayer after December 31, 1986.

[T.D. 8302, 55 FR 21189, May 23, 1990; 55 FR 25973, June 26, 1990]

**§ 1.42-3 Treatment of buildings financed with proceeds from a loan under an Affordable Housing Program established pursuant to section 721 of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA).**

(a) *Treatment under sections 42(i) and 42(b).* A below market loan funded in whole or in part with funds from an Affordable Housing Program established under section 721 of FIRREA is not, solely by reason of the Affordable Housing Program funds, a below market Federal loan as defined in section 42(i)(2)(D). Thus, any building with respect to which the proceeds of the loan are used during the tax year is not, solely by reason of the Affordable Housing Program funds, treated as a federally subsidized building for that tax year and subsequent tax years for purposes of determining the applicable percentage for the building under section 42(b).

(b) *Effective date.* The rules set forth in paragraph (a) of this section are effective for loans made after August 8, 1989.

469; *Knetsch v. United States*, 364 U.S. 361 (1960), 1961-1 C.B. 34 (“sham” or “economic substance” analysis); and *Frank Lyon Co. v. Commissioner*, 435 U.S. 561 (1978), 1978-1 C.B. 46 (“ownership” analysis).

(c) *Effective date.* The rules set forth in paragraphs (a) and (b) of this section are effective with respect to buildings placed in service after December 31, 1986.

[T.D. 8420, 57 FR 24729, June 11, 1992]

**§ 1.42-5 Monitoring compliance with low-income housing credit requirements.**

(a) *Compliance monitoring requirement—(1) In general.* Under section 42(m)(1)(B)(iii), an allocation plan is not qualified unless it contains a procedure that the State or local housing credit agency (“Agency”) (or an agent of, or other private contractor hired by, the Agency) will follow in monitoring for noncompliance with the provisions of section 42 and in notifying the Internal Revenue Service of any noncompliance of which the Agency becomes aware. These regulations only address compliance monitoring procedures required of Agencies. The regulations do not address forms and other records that may be required by the Service on examination or audit. For example, if a building is sold or otherwise transferred by the owner, the

<https://www.irs.gov/pub/irs-utl/lihc-form8823guide.pdf>

[eCFR :: 26 CFR 1.42-5 -- Monitoring compliance with low-income housing credit requirements.](#)

**Low-Income Housing Credit Agencies  
Report of Noncompliance or Building Disposition**

**Note:** File a separate Form 8823 for each building that is disposed of or goes out of compliance.

OMB No. 1545-1204

Check here if this is an amended return

**1** Building name (if any). Check if item 1 differs from Form 8609

Street address

City or town, state, and ZIP code

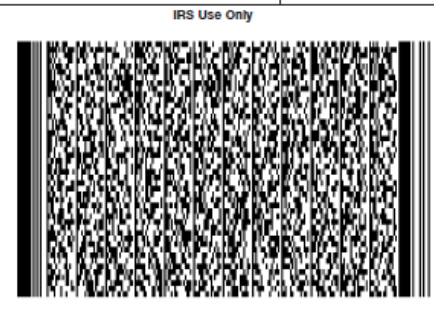
**2** Building identification number (BIN)

**3** Owner's name. Check if item 3 differs from Form 8609

Street address

City or town, state, and ZIP code

**4** Owner's taxpayer identification number  EIN  SSN



**5** Total credit allocated to this BIN . . . . . ▶ \$

**6** If this building is part of a multiple building project, enter the number of buildings in the project . . . ▶

**7 a** Total number of residential units in this building . . . . . ▶

**b** Total number of low-income units in this building . . . . . ▶

**c** Total number of residential units in this building determined to have noncompliance issues . . . . . ▶

**d** Total number of units reviewed by agency (see instructions) . . . . . ▶

**8** Date building ceased to comply with the low-income housing credit provisions (see instructions) (MMDDYYYY) . . . . .

**9** Date noncompliance corrected (if applicable) (see instructions) (MMDDYYYY) . . . . .

**10** Check this box if you are filing only to show correction of a previously reported noncompliance problem . . . . .

**11** Check the box(es) that apply:

	Out of compliance	Noncompliance corrected
<b>a</b> Household income above income limit upon initial occupancy . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>b</b> Owner failed to correctly complete or document tenant's annual income recertification . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>c</b> Violation(s) of the UPCS or local inspection standards (see instructions) (attach explanation) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>d</b> Owner failed to provide annual certifications or provided incomplete or inaccurate certifications . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>e</b> Changes in Eligible Basis or the Applicable Percentage (see instructions) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>f</b> Project failed to meet minimum set-aside requirement (20/50, 40/60 test) (see instructions) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>g</b> Gross rent(s) exceed tax credit limits . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>h</b> Project not available to the general public (see instructions) (attach explanation) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>i</b> Violation(s) of the Available Unit Rule under section 42(g)(2)(D)(ii) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>j</b> Violation(s) of the Vacant Unit Rule under Reg. 1.42-5(c)(1)(ix) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>k</b> Owner failed to execute and record extended-use agreement within time prescribed by section 42(h)(6)(J) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>l</b> Low-income units occupied by nonqualified full-time students . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>m</b> Owner did not properly calculate utility allowance . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>n</b> Owner has failed to respond to agency requests for monitoring reviews . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>o</b> Low-income units used on a transient basis (attach explanation) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>p</b> Building is no longer in compliance nor participating in the section 42 program (attach explanation) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>
<b>q</b> Other noncompliance issues (attach explanation) . . . . .	<input type="checkbox"/>	<input type="checkbox"/>

**12** Additional information for any item above. Attach explanation and check box

**13 a** Building disposition by  Sale  Foreclosure  Destruction  Other (attach explanation)

**b** Date of disposition (MMDDYYYY)

**c** New owner's name

Street address

City or town, state, and ZIP code

**d** New owner's taxpayer identification number  EIN  SSN

**14** Name of contact person

**15** Telephone number of contact person ( ) Ext.

Under penalties of perjury, I declare that I have examined this report, including accompanying statements and schedules, and to the best of my knowledge and belief, it is true, correct, and complete.

Signature of authorizing official \_\_\_\_\_ Print name and title \_\_\_\_\_ Date (MMDDYYYY) \_\_\_\_\_

# Consequences of non-compliance

- Loss of credits
- Affects the owners' income taxes
- Financial loss
- Unfavorable standing making it difficult to receive future funding from RIHousing.
- Poor performance rating
- May be in noncompliance for a very long time
  - Full time student household – can't evict
  - Over income household – can't evict





# Merging Old and New Properties



- Old = existing LIHTC building with LIHTC qualified tenants in place
- LIHTC qualified tenants in place = tenants were certified LIHTC qualified when they first moved into the project.
- Original MI TIC certification should be on hand.





# Merging Old and New Properties *(cont.)*

- New = existing vacant building acquired and rehabilitated
- New = new construction
- New = existing building that has never had LIHTC and with in-place tenants who have never qualified as a LIHTC household.



# Merging Old and New Properties *(cont.)*

- How is your software set up – one project? Two different projects?
- How will data be uploaded to Procorem?
- Don't change property's formatting/unit numbers, etc before you consult with RIHousing regarding formatting in Procorem.
- If the project name changes, don't change in your software until you consult with RIHousing



# Merging Old and New Properties *(cont.)*



- BIN numbers stay the same for the “old” project.
- Keep a rent roll and historic data prior to merging in software.
- Any AAC Waiver in place is voided with a new allocation of credits.
- Make sure tenants only qualify one unit if Unit Transfers are taking place due to rehab.
- Be aware of the vacant unit rule.
- Non-100% LIHTC properties must ensure that the LIHTC units are filled prior to the market units.



# Merging Old and New Properties *(cont.)*

- Different income limits
- Different PIS dates
- How will 8609 line item 8b be answered?
- 120-day Certification Rule - Income certifications for households who are in-place on the date of acquisition that are completed no more than 120 days **before or after** the date of acquisition may have an effective date as of the acquisition date.
- Certifications completed after the 120 days are effective the date the last adult signs the certification.
- New residents that move in after the acquisition of an existing property have effective dates based on move-in date.



# Merging Old and New Properties *(cont.)*

From our Manual – beginning on page 119

- According to the IRS' 8823 Guide, "households determined to be income-qualified under IRC §42 during the 15-year compliance period are concurrently income-qualified households for purposes of the +30- year extended use agreement. As a result, any household determined to be income qualified at the time of move-in for purpose of the extended use agreement is a qualified low-income household for **any subsequent allocation** of IRC §42 credit."
- The IRS does not specify what paperwork is required to prove that an in-place household qualified; however, at minimum, the original tenant income certification (TIC) and backup documentation proving that the household qualified at move-in should be retained with the new file establishing the second set of credits. The owner/agent must review the original certification documents to ensure that there is sufficient evidence of income qualification.
- RIHousing allows either relying on original paperwork or a certification current to resyndication as evidence of initial qualification



# Questions?

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## **RIHousing has partnered with ProLink Solutions for the purpose of monitoring multifamily developments**

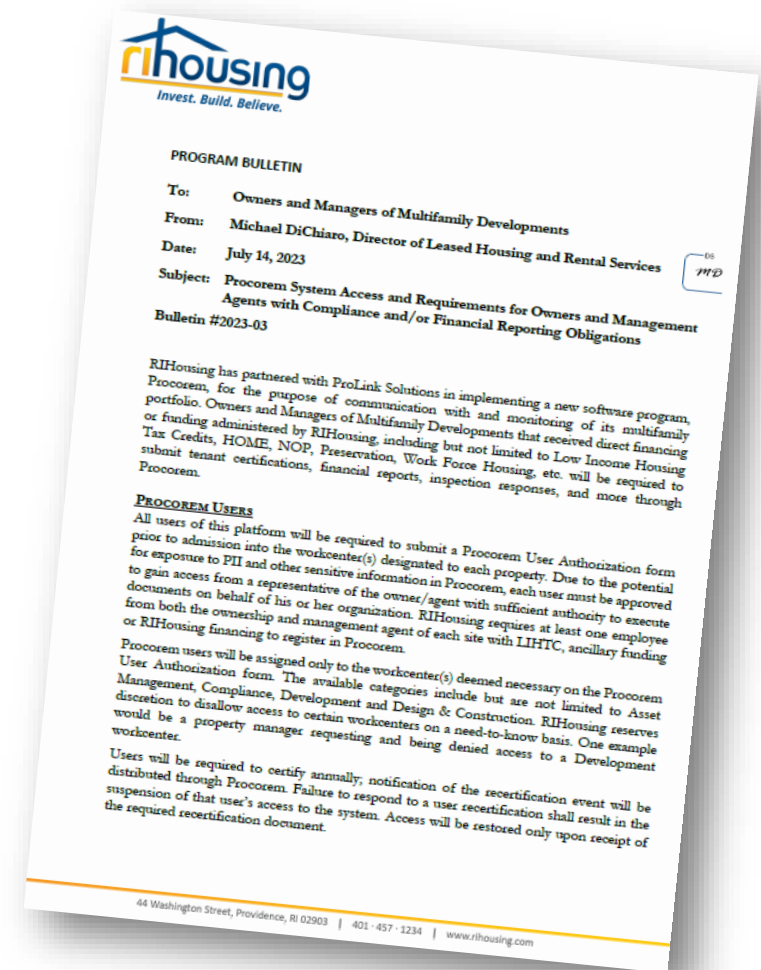
- RIHousing Asset Management staff will be using ProLink going forward
  - LIHTC Compliance
  - Ancillary Compliance
  - Financial reporting
- Owners and management agents will access





## Program Bulletin #2023-03 circulated on July 14, 2023

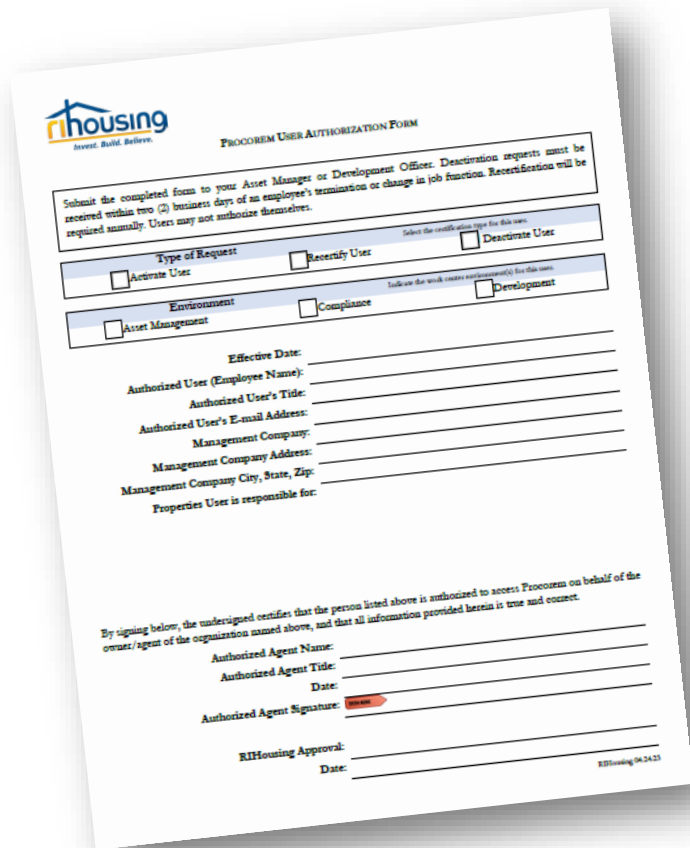
- Procorem Users
- Procorem Workcenters
- Tenant Events
- Data Integrity
- Market Units
- Asset Management
- Multifamily Inspections & File Reviews
- Owner's Certifications
- Navigating the Workcenters





## Procorem Users

- All users are required to submit a Procorem User Authorization form
- At least one employee from ownership and management agent of each site
  - LIHTC
  - Ancillary funding
  - RIHousing financing
- Users will be recertified annually



**rihousing**  
Invest. Build. Better.

**PROCOREM USER AUTHORIZATION FORM**

Submit the completed form to your Asset Manager or Development Officer. Deactivation requests must be received within two (2) business days of an employee's termination or change in job function. Recertification will be required annually. Users may not authorize themselves.

Select the credit class type for this user:

Type of Request:  Activate User  Recertify User  Deactivate User

Select one or more credit classes responsible for this user:

Environment:  Asset Management  Compliance  Development

Effective Date: \_\_\_\_\_

Authorized User (Employee Name): \_\_\_\_\_

Authorized User's Title: \_\_\_\_\_

Authorized User's E-mail Address: \_\_\_\_\_

Management Company: \_\_\_\_\_

Management Company Address: \_\_\_\_\_

Management Company City, State, Zip: \_\_\_\_\_

Properties User is responsible for: \_\_\_\_\_

By signing below, the undersigned certifies that the person listed above is authorized to access Procorem on behalf of the owner/agent of the organization named above, and that all information provided herein is true and correct.

Authorized Agent Name: \_\_\_\_\_

Authorized Agent Title: \_\_\_\_\_

Date: \_\_\_\_\_

Authorized Agent Signature: \_\_\_\_\_

RIHousing Approval: \_\_\_\_\_

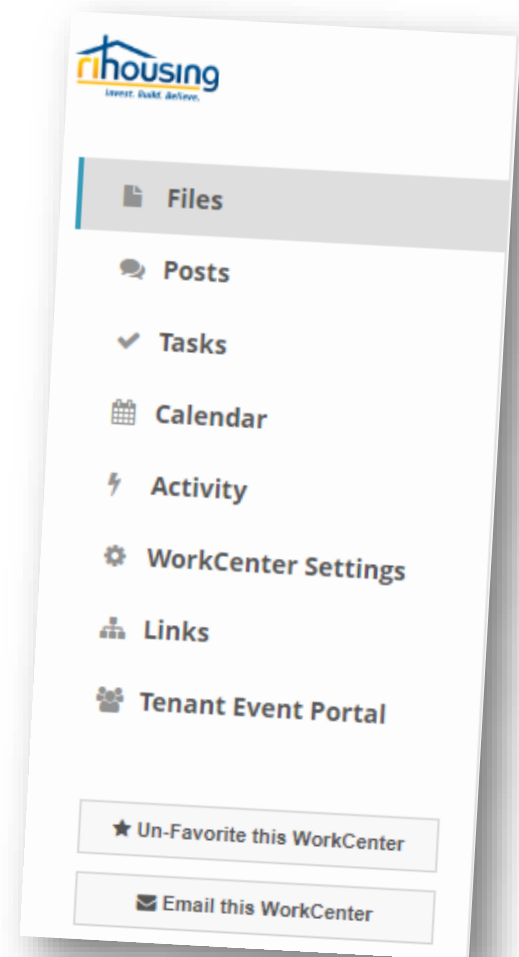
Date: \_\_\_\_\_

RIHousing 04.24.13



## Procorem Workcenters

- User-friendly
- Site-specific
  - Upload tenant events
  - Submit documents and reports
  - Provide tenant files for review
- System-generated reminders
- Transparency
  - Site documents will be available
    - Regulatory Agreement
    - LURA
    - Other agreements





## Tenant Events

- Procorem is replacing WTC
- Due by the 10<sup>th</sup> of the month
  - Sites capable of generating XML file must upload a year-to-date XML file monthly
    - NAHMA XML Standard 4.0, 5.0, or 6.0
  - Manual entry of tenant events required for sites without the ability to upload
- Submit only after all certs for the compliance year have been captured
  - If the submit button is clicked, please notify your Asset Manager to unlock the tenant event update
- Straight PBCA sites without RIHousing, LIHTC, or ancillary funding layer are exempt for now

*Upload YTD monthly*

### 2023 - Tenant Events

🔒 Events: None

👤 Submitted By:

⚠️ Compliance Period: Pending

### 2022 - Tenant Events

🔒 Events: None

👤 Submitted By:

⚠️ Compliance Period: Pending

**Due September 15, 2023**



## Data Integrity

- HUD Data Reporting required annually
  - RIHousing submits LIHTC tenant data via XML
- Certain fields must match between your property management software and Procorem
  - Property Name
  - BIN
  - Building Name (Address)
  - Unit #
- Excel report in Compliance workcenter



## Market Units

### MARKET UNITS

Developments with less than 100% affordable units are hereby required to report on market units in Procorem. In LIHTC properties, a market unit is a non-LIHTC unit. Similarly, sites with ancillary programs may have an affordable unit percentage less than 100%, resulting in units with no affordable programs associated to them; for the purpose of data collection, those are also market units.

Reporting requirements on market unit households is limited to the apartment number, tenant paid rent, utility allowance (if applicable), and gross rent. Household names are not required as part of the tenant event submission. Owners and management agents may opt to report household names as “Market” and “Unit” as the first and last names, respectively.



## Asset Management

- Separate workcenter from Compliance
- Will replace e-mail boxes currently used
- Standardized Templates
- Efficient and secure submission
- Improved communications
- Deadline reminders





## Multifamily Inspections & File Reviews

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- RIHousing offers the option of a remote file review
  - Partners will be allowed the same choice in Procorem
  - PBCA sites with no further multifamily funding will remain in SharePoint until further notice
- Procorem will deliver notifications and findings
  - Cuts down on e-mail and centralizes correspondence

## Owner's Certifications

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- Procorem will distribute and serve as the collection center for annual owner's certifications
  - The task category exists in the compliance workcenter but will be built toward the end of 2023



## Didn't Get Your Invite?

- Check your junk mail
- Contact your IT Department
- Contact Procorem System Admin to confirm your e-mail address







Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Files

Each property will have nearly identical file structures unique to their property funding and compliance layers. Site-specific legal and recorded documents such as the Regulatory Agreement, LURA, 8609(s), etc. will be available in Procorem. If they are not yet available when you explore your workcenter, please be patient while we perform our processes to upload these items. When submitting a document for a task, the file path will be identified in the Location field.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Posts

Communicate with your Asset Manager directly through Procorem using the Posts feature. Each Compliance workcenter comes with a default post directing users to ProLink's online training featuring tenant events and all of the available help center resources to guide you along the way.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Tasks

A Procorem workcenter may be built to remind users of upcoming deadlines and reminders of past due deadlines with built-in tasks.

When submitting a document for a task, the file path where the item should be stored will be identified within the Location field within a task.

You can mark tasks as completed;  
RIHousing staff may approve tasks.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Calendar

Tasks with dates assigned to them will be reflected on the calendar in a workcenter.

The beginning date of the task, end date of the task, and all dates in between will be highlighted.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Activity

Shows you what you may have missed. Entries are logged for each task completed, file uploaded, file downloaded, etc.

Your e-mail notifications should look similar to what you see in the Activity section of Procorem.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Links

Not applicable to all workcenters. If there is only one workcenter for a property, it will not have any links.

Remember, some sites have both an Asset Management workcenter and a Compliance workcenter; those will be linked.

Permission settings and the completed Procorem User Authorization form will determine whether you have access to any linked workcenters.





Files



Posts



Tasks



Calendar



Activity



Links



Tenant Event Portal

## Tenant Event Portal

Available only in Compliance workcenters, this portal is where tenant events must be uploaded by the 10<sup>th</sup> of each month.





# Tenant Event Portal



## Adding Tenant Events

The Tenant Event Portal offers two ways to enter tenant events.

### XML Import

Properties with Property Management Software that provides the capability to generate a NAHMA Unit Status report can import all events for the compliance period (or year-to-date) using the XML Import Function.

A green button with a white upload icon and the text "Import Tenant Events".

↑ Import Tenant Events

### Manual Entry

Owner/agents can enter tenant events manually for the compliance period.

A blue button with a white plus icon and the text "Add Tenant Event".

+ Add Tenant Event

*The pale-yellow sections throughout the portal provide much of the information we're discussing and are worth reviewing if you have questions while importing tenant events.*



## Adding Tenant Events

RIHousing requires tenant event updates by the 10<sup>th</sup> of each month.

### XML Import

- Generate the year-to-date XML file from property management software
- Upload the year-to-date XML file into the Tenant Event Portal
  - Yes, upload a file even if there were no changes to tenant events.
- Mark associated Tasks as Complete

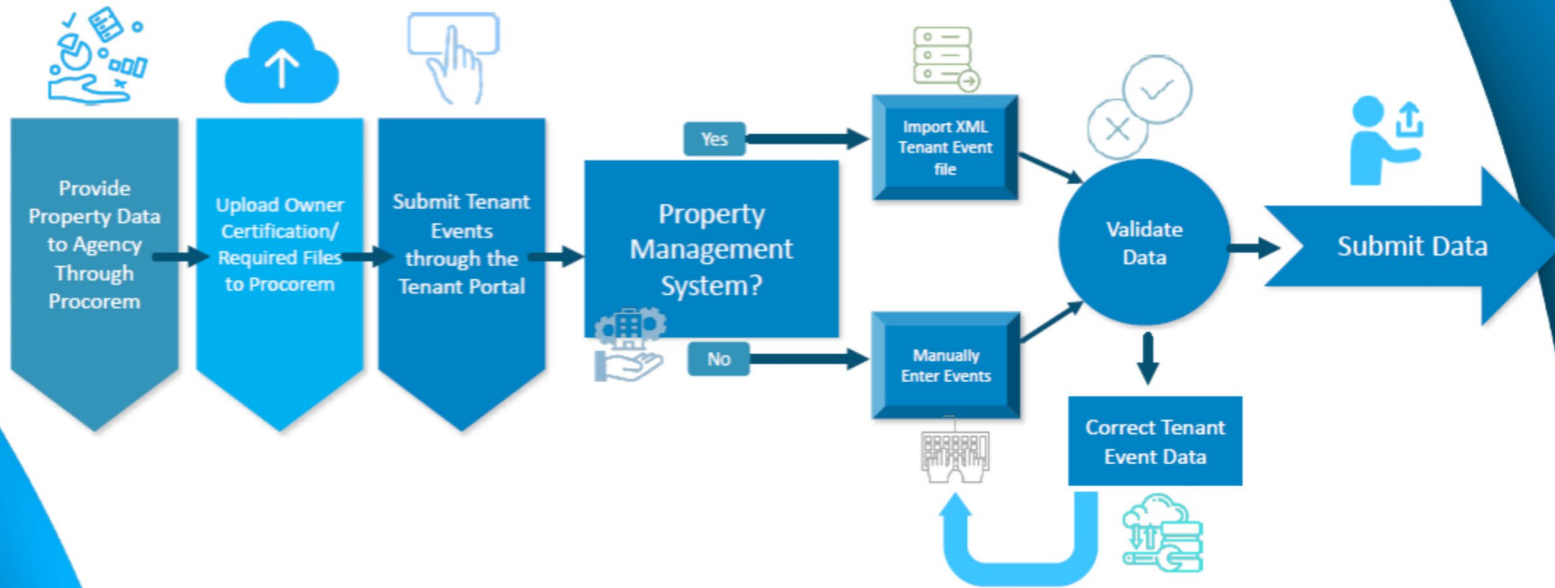
### Manual Entry

- Enter all tenant events that have taken place since the last update.
- Mark associated Tasks as Complete
- If there were no changes since the last upload, use the Comment option in the Tasks to communicate with your Asset Manager

*The pale-yellow sections throughout the portal provide much of the information we're discussing and are worth reviewing if you have questions while importing tenant events.*



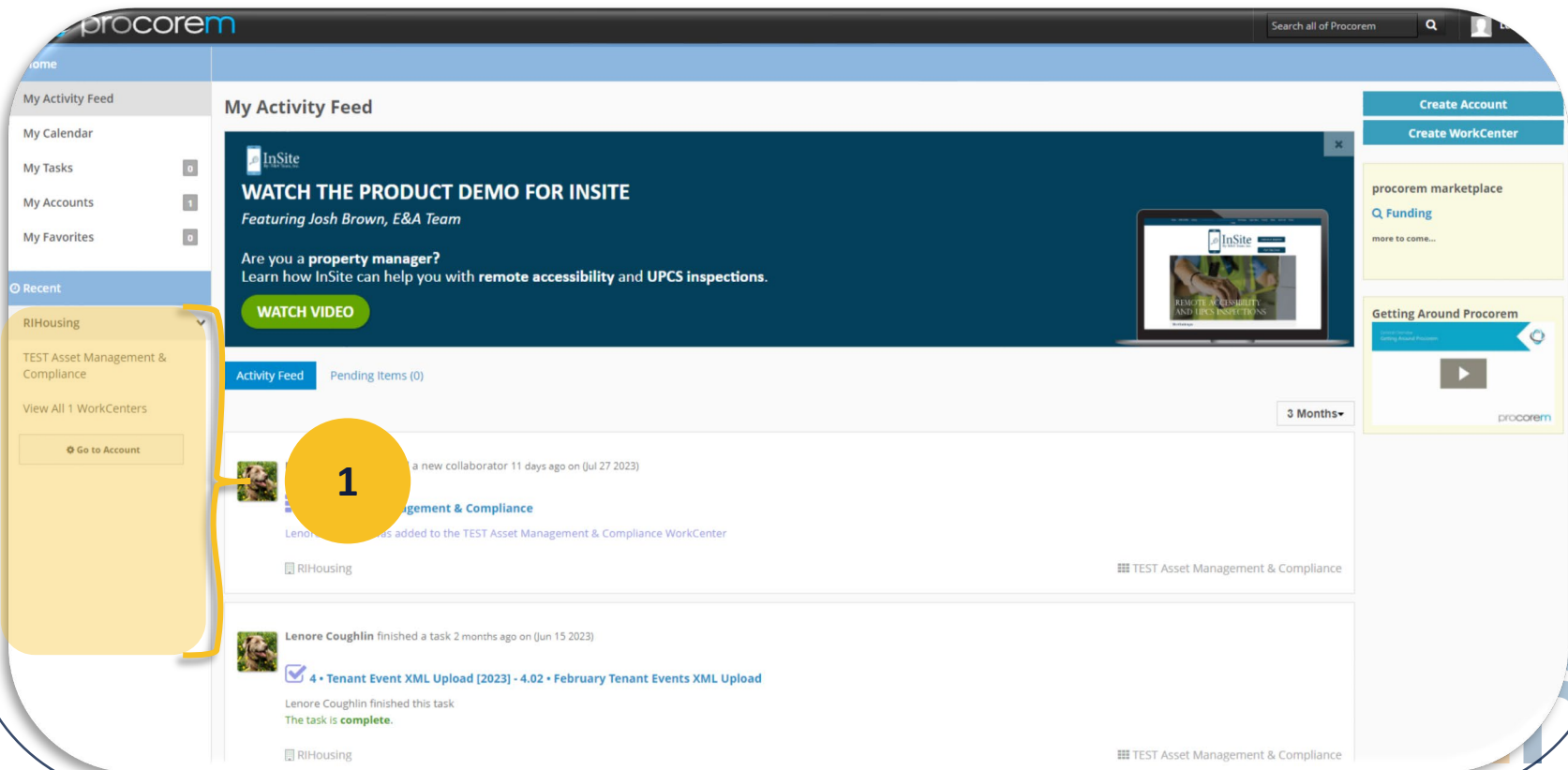
## Using the Tenant Portal



## Accessing the Tenant Portal

1

Log into Procorem and select the desired workcenter.

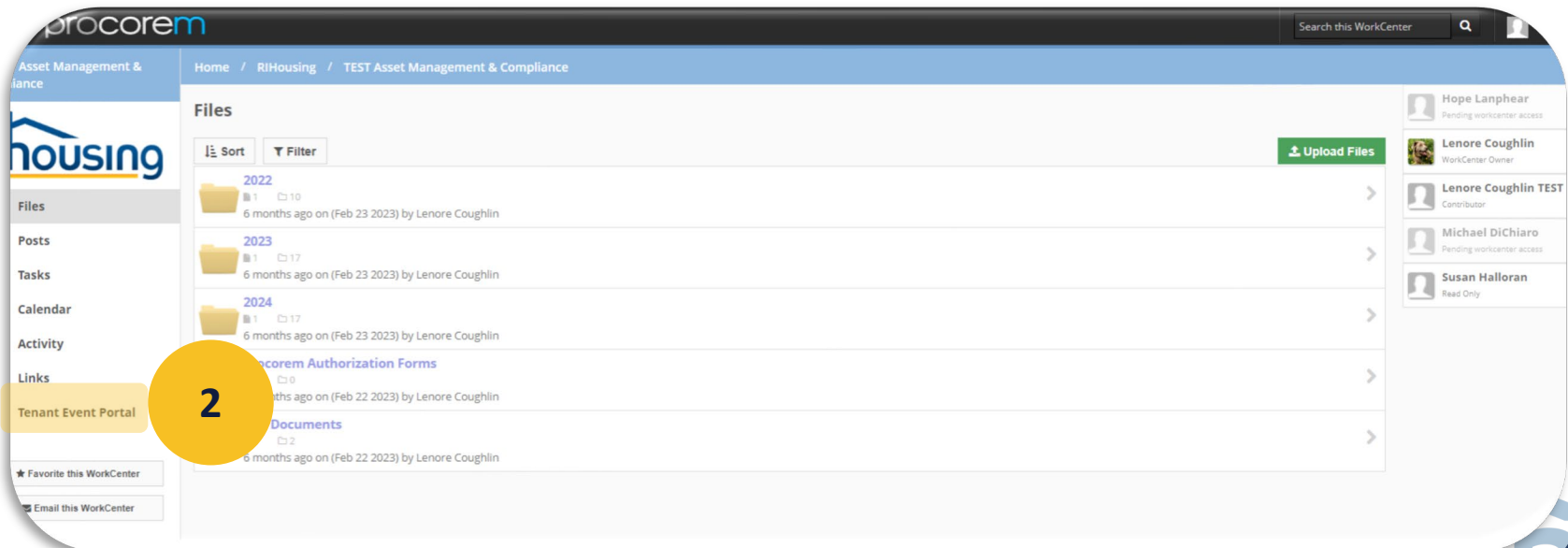


The screenshot displays the Procorem tenant portal interface. On the left, a sidebar lists navigation options: My Activity Feed, My Calendar, My Tasks (0), My Accounts (1), My Favorites (0), and Recent. Under 'Recent', 'RiHousing' is selected, and 'TEST Asset Management & Compliance' is listed below it. A 'Go to Account' button is visible. The main content area is titled 'My Activity Feed' and features a large banner for 'WATCH THE PRODUCT DEMO FOR INSITE' with a 'WATCH VIDEO' button. Below the banner, the activity feed shows two items: a new collaborator added to the 'TEST Asset Management & Compliance' workcenter and a task '4 • Tenant Event XML Upload [2023] - 4.02 • February Tenant Events XML Upload' completed by Lenore Coughlin. A yellow callout box with a large number '1' points to the 'TEST Asset Management & Compliance' workcenter name in the activity feed. The right sidebar contains 'Create Account', 'Create WorkCenter', 'procorem marketplace' with a 'Funding' link, and 'Getting Around Procorem' with a play button icon.

## Accessing the Tenant Portal

2

The **Tenant Event Portal** is accessed via the left navigation panel on the selected workcenter. Click on the **Tenant Event Portal** menu item to navigate to the **Compliance Periods** for the workcenter/property.

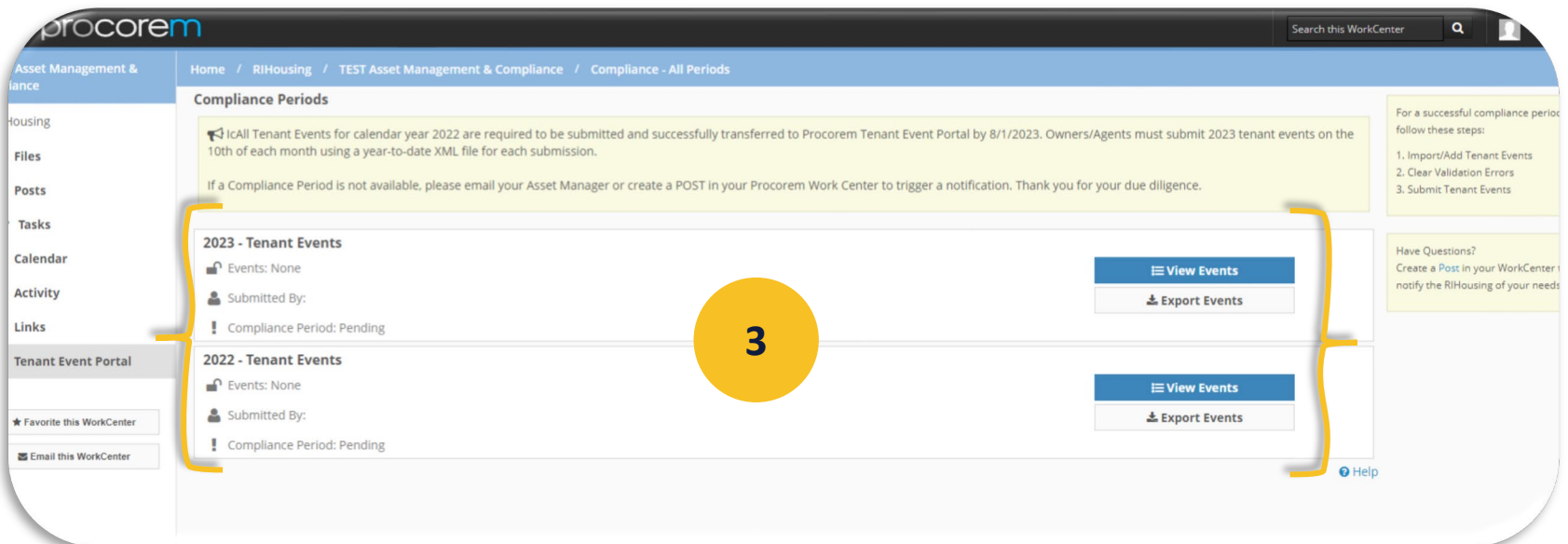


The screenshot displays the Procorem Tenant Event Portal interface. The top navigation bar includes the Procorem logo, a search bar labeled "Search this WorkCenter", and a user profile icon. The breadcrumb trail reads "Home / RIHousing / TEST Asset Management & Compliance". The left sidebar contains a navigation menu with items: Files, Posts, Tasks, Calendar, Activity, Links, and Tenant Event Portal. The "Tenant Event Portal" item is highlighted with a yellow background and a yellow circle containing the number "2". The main content area is titled "Files" and features a "Sort" and "Filter" dropdown, an "Upload Files" button, and a list of folders for the years 2022, 2023, and 2024. Each folder is labeled "6 months ago on (Feb 23 2023) by Lenore Coughlin". Below the folders are sections for "Procorem Authorization Forms" and "Documents". The right sidebar shows a user list with names and roles: Hope Lanphear (Pending workcenter access), Lenore Coughlin (WorkCenter Owner), Lenore Coughlin TEST (Contributor), Michael DiChiaro (Pending workcenter access), and Susan Halloran (Read Only).

## Accessing the Tenant Portal

3

Select the **View Events** button for the **Compliance Year** you're working on. Best practice is to work from oldest to newest.

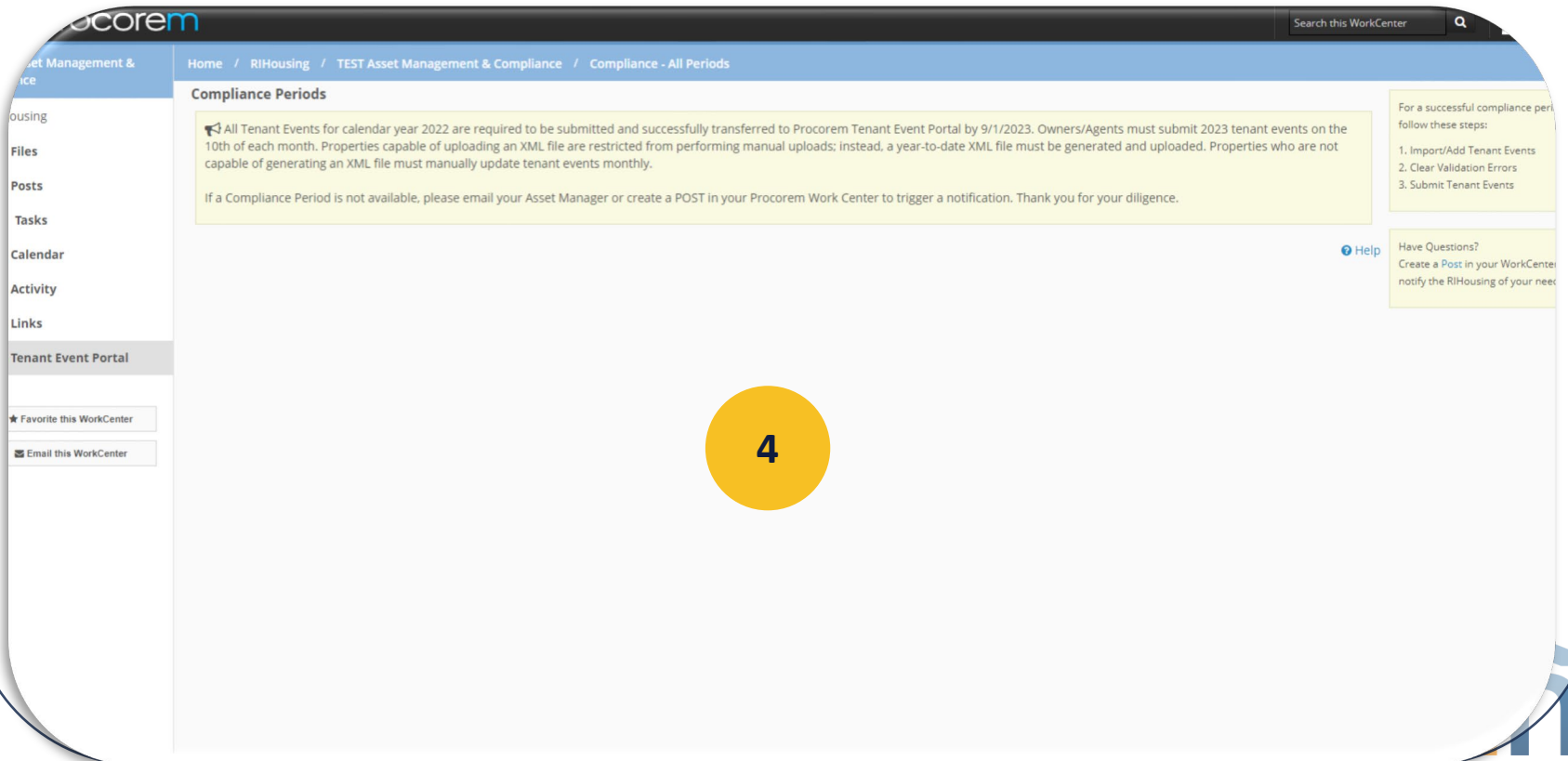


The screenshot displays the Procorem Tenant Portal interface. The breadcrumb trail is: Home / RIHousing / TEST Asset Management & Compliance / Compliance - All Periods. The main content area is titled "Compliance Periods" and contains a yellow notification box with the following text: "All Tenant Events for calendar year 2022 are required to be submitted and successfully transferred to Procorem Tenant Event Portal by 8/1/2023. Owners/Agents must submit 2023 tenant events on the 10th of each month using a year-to-date XML file for each submission. If a Compliance Period is not available, please email your Asset Manager or create a POST in your Procorem Work Center to trigger a notification. Thank you for your due diligence." Below this, there are two sections for tenant events: "2023 - Tenant Events" and "2022 - Tenant Events". Each section shows "Events: None", "Submitted By:" (with a user icon), and "Compliance Period: Pending". To the right of each section are two buttons: "View Events" and "Export Events". A large yellow circle with the number "3" is overlaid on the "View Events" button for the 2022 section. On the right side of the interface, there are two informational boxes: one for successful compliance steps (Import/Add Tenant Events, Clear Validation Errors, Submit Tenant Events) and another for help (Have Questions? Create a Post in your WorkCenter to notify the RIHousing of your needs). The left sidebar contains navigation options like Asset Management & Compliance, RIHousing, Files, Posts, Tasks, Calendar, Activity, Links, Tenant Event Portal, Favorite this WorkCenter, and Email this WorkCenter. The Procorem logo is in the top left, and the RIHousing logo is in the bottom right.

## Accessing the Tenant Portal

4

If the **Compliance Periods** page is blank, contact your Asset Manager.



The screenshot shows the Procorem Tenant Portal interface. The breadcrumb trail is: Home / RIHousing / TEST Asset Management & Compliance / Compliance - All Periods. The main heading is "Compliance Periods". A yellow notification box contains the following text: "All Tenant Events for calendar year 2022 are required to be submitted and successfully transferred to Procorem Tenant Event Portal by 9/1/2023. Owners/Agents must submit 2023 tenant events on the 10th of each month. Properties capable of uploading an XML file are restricted from performing manual uploads; instead, a year-to-date XML file must be generated and uploaded. Properties who are not capable of generating an XML file must manually update tenant events monthly. If a Compliance Period is not available, please email your Asset Manager or create a POST in your Procorem Work Center to trigger a notification. Thank you for your diligence." To the right, a sidebar lists steps for a successful compliance period: 1. Import/Add Tenant Events, 2. Clear Validation Errors, 3. Submit Tenant Events. Below this is a "Help" link and a "Have Questions?" section with the text "Create a Post in your WorkCenter to notify the RIHousing of your need". At the bottom of the page, there are buttons for "Favorite this WorkCenter" and "Email this WorkCenter". A large yellow circle with the number "4" is overlaid on the bottom center of the screenshot.

## 2022 Tenant Event Update Notes

- Tenant event data that was reported to RIHousing prior to November 7, 2022 was migrated into ProLink.
- Must be updated before working on the 2023 Compliance Year
- The deadline for updating the 2022 Tenant Events was September 15, 2023
- Each compliance workcenter comes with a detailed list of the property name, BIN, building name (address), and unit number



## 2022 Tenant Event Update for Sites Using XML Upload

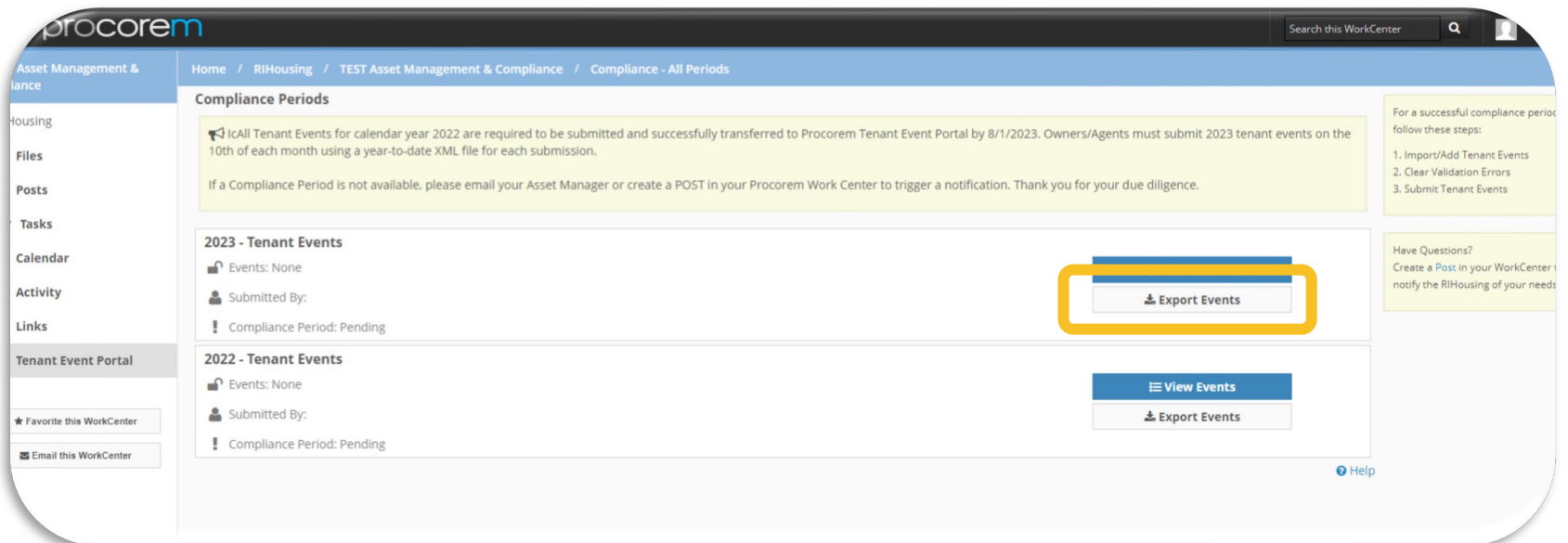
1. Generate the 2022 XML file from 1/1/22 – 12/31/22 from your property management software
2. Upload the 2022 XML file into the Tenant Event Portal
3. Validate the tenant event update and address errors as necessary
4. Submit after errors are cleared

## 2022 Tenant Event Update for Sites Doing Manual Entry

1. Review the existing certifications in Procorem
2. Enter any tenant events that have not been captured
3. Validate the tenant event update and address errors as necessary
4. Submit after errors are cleared

## Occupancy Report

Generate an occupancy report using tenant event data in Procorem by selecting the **Export Events** button for a given year.



The screenshot shows the Procorem Tenant Event Portal interface. The breadcrumb navigation is: Home / RI Housing / TEST Asset Management & Compliance / Compliance - All Periods. The main content area is titled "Compliance Periods" and contains a yellow notification box with the following text: "ICAll Tenant Events for calendar year 2022 are required to be submitted and successfully transferred to Procorem Tenant Event Portal by 8/1/2023. Owners/Agents must submit 2023 tenant events on the 10th of each month using a year-to-date XML file for each submission. If a Compliance Period is not available, please email your Asset Manager or create a POST in your Procorem Work Center to trigger a notification. Thank you for your due diligence." Below this, there are two sections for tenant events: "2023 - Tenant Events" and "2022 - Tenant Events". Each section shows "Events: None", "Submitted By:", and "Compliance Period: Pending". In the 2023 section, the "Export Events" button is highlighted with a yellow box. In the 2022 section, the "View Events" and "Export Events" buttons are visible. On the right side, there are two yellow boxes: one with steps for a successful compliance period (1. Import/Add Tenant Events, 2. Clear Validation Errors, 3. Submit Tenant Events) and another with a "Have Questions?" section (Create a Post in your WorkCenter to notify the RI Housing of your needs). The bottom right corner has a "Help" link.

*Property Name • BuildingName • Unit # • # of Bedrooms • Unit Type • Program(s) • HOME Unit Type • Event Type • Event Date • Transfer To Building • Transfer To Unit • Total Household Members • Head of Household • Student Status • Full Time Student Exceptions • Total Household Income • Gross Rent • Tenant Rent Portion • Utility Allowance • Federal Rental Assistance Amount • Federal Rental Assistance Source • Non Federal Rental Assistance Amount • Non Federal Rental Assistance Source • Special Needs • Most Restrictive Income Designation • Most Restrictive Rent Designation*



# Tasks

In addition to the monthly tenant event update, management agents responsible for updating tenant events must complete the corresponding tasks in Procorem by marking them **Complete** by checking the boxes for the month.

### Edit Task

[Main](#) | [\(0\) Comments](#) | [\(2\) Reminders](#) | [\(0\) Files](#) | [Activities](#)

**Task Title**: 1.01 • 2022 Tenant Event Update

**Status**: Pending Assignees  
Task is unassigned

Mark as Completed

**Task Group**: [2023] 1 • Tenant Event Update

**Description**: Upload the 2022 Tenant Event XML File into Tenant Event Portal or enter certifications manually. Mark this task as complete after a successful update. Use the Comments tab above to communicate errors with RIHousing staff.

**Location**: Tenant Event Portal

**Start Date**: 08/24/2023 12:00 AM

**Due Date**: 09/15/2023 5:00 PM

Using (UTC-05:00) Eastern Time (US & Canada). Click [here](#) to change your time zone.

**Assigned To**:
 

Assignees	
Management Agent	✕
Owner/Agent	✕
Property Manager	✕

### Tasks

[View: Task Group](#) | [Show Completed](#) | [Hide](#)

**[2023] 1 • Tenant Event Update**

<input checked="" type="checkbox"/>	<b>1.01 • 2022 Tenant Event Update</b> 2 <small>Due in 15 days (Sep 15, 2023, 05:00 PM EDT),</small>
<input checked="" type="checkbox"/>	<b>1.02 • Validate 2022 Tenant Events</b> <small>Due in 15 days (Sep 15, 2023, 05:00 PM EDT),</small>
<input checked="" type="checkbox"/>	<b>1.03 • Submit 2022 Tenant Events</b> 2 <small>Due in 15 days (Sep 15, 2023, 05:00 PM EDT),</small>



## Monthly Tasks

1. Tenant Event Update
2. Validate Tenant Events

## Annual Tasks

1. Final Tenant Event Update
2. Validate Tenant Events for the year
3. Submit Tenant Events

## Coming Soon

- **Procorem Training for Developers**
- **Average Income Test in Procorem**

# Procorem Help



# Questions?

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# NSPIRE



- This is a new physical inspection standard being adopted by the IRS and HUD.
- National Standards for the Physical Inspection of Real Estate (NSPIRE), will replace the Uniform Physical Condition Standards (UPCS) and the Housing Quality Standards (HQS)
- This includes REAC inspections and the unit inspections done by our inspectors
- Effective for LIHTC on October 1, 2023



# NSPIRE Changes

- The new standards cover habitability requirements, such as functional kitchens and flushable toilets, as well as crucial safety aspects like Ground Fault Circuit Interrupter (GFCI) outlets, permanent heating sources, and safe drinking water.
- Mandatory smoke detector and carbon monoxide alarms
- Elimination of cosmetic deficiencies
- Regular review of standards every three years by HUD
- Revisions to deficiency categories: life-threatening, severe, moderate, and low
- New post-inspection report
- Has a 100 point score for properties inspected by HUD's Real Estate Assessment Center (REAC), which considered a failing score to be less than 60 points
- There are three inspectable areas: the dwelling unit; inside a building containing a unit; and outside areas of a building. In-unit deficiencies are weighted more heavily.



# Delays

- The Department of Housing and Urban Development (HUD) has [announced](#) it is delaying NSPIRE until October 1, 2024, for Community Planning and Development (CPD) programs.
- Programs covered by the delay notice include the HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Housing Opportunities for Persons with AIDS (HOPWA), Emergency Solution Grants (ESG), and Continuum of Care (CoC) programs.



# Questions?

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