

Missouri Housing Development Commission Low Income Housing Tax Credit Program

Compliance Training Requirements REVISION NOTICE #09-007

Compliance Manual section 1.4 and section 3.3: (B) OWNER Responsibilities

2. Compliance Training

Developments that are placed-in-service in 2003 and thereafter will be required to have the Owners and their on-site managers complete a compliance training session that is either approved or conducted by MHDC, prior to receiving IRS FORM 8609. In addition, **any and all new managers will be required to attend a compliance training session, with ongoing training to be updated at least every 2 years.** A compliance provider listing can be found on our website, www.mhdc.com.

C. Management Agent and On-Site Personnel

The owner, managing agents and representatives are responsible for the correct implementation of the LIHTC Program requirements. Anyone who is authorized to lease apartment units to residents must be thoroughly familiar with all federal laws, rules and regulations governing certification and leasing procedures.

3.3 COMPLIANCE TRAINING

Developments that are placed-in-service in 2003 and thereafter will be required to have the Owners, **and** their on-site managers complete a compliance training session, that is either approved or conducted by MHDC, prior to receiving the IRS FORM 8609. In addition, **any and all new managers will be required to attend compliance training session as a condition of the approval of any new management contract as described in Section 1.6 B.**

Amendment effective 10/1/09

Compliance Training

Representatives of the ownership entity and management company who are responsible for the day-to-day operations and compliance reviews for the property, must have successfully completed LIHTC training conducted or approved by MHDC within the most recent two years preceding the issuance of IRS FORM 8609 **and** for every two (2) years following.

For those companies that designate staff to attend in third party provided training and return to train other members of ownership and/or management staff who conduct day-to-day operations and compliance reviews at the property ("employer trainer" or internal company instructor), the following rules apply:

- If a third party source will conduct training, the person or entity must not be an identity-of-interest party to the ownership or management entity.
- The third party training provider must issue certificates of completion to attendees to be retained on file as evidence of completion.

- If training is to be conducted by an "employer trainer", owner or management agent must submit to MHDC both a resume that supports the trainer's qualifications and the training curriculum to be considered and approved by MHDC in advance of conducting the training session. The Employer trainer must issue certificates of completion to attendees to be retained on file as evidence of completion and upon MHDC request.

Staff responsible for ongoing day-to-day operations and qualifying households who have not completed program training that satisfies MHDC's training requirements are considered to be non-compliant.

A compliance provider listing can be found on our website, www.mhdc.com.