



MISSOURI HOUSING DEVELOPMENT COMMISSION

PROGRAM TRAINING REQUIREMENTS

All property owners and management agents are required to attend Compliance Training prior to the issuance of an IRS Form 8609. A Form 8609 will not be issued to a property owner who has not met the compliance training requirement. In addition, all new managers are required to attend a compliance training session, with ongoing training to be updated at least every two years.

The owner must ensure that the onsite management knows, understands, and complies with all applicable federal and state rules, regulations, and policies governing the property.

MHDC encourages the owner to make certain that the property's management and compliance personnel are familiar with all MHDC program compliance manuals and forms and information on the MHDC website.

MHDC strongly encourages owners and management companies to provide Fair Housing and Equal Opportunity training for all staff, including maintenance staff, associated with any property. It is suggested that staff attend a Fair Housing and Equal Opportunity training at least once every calendar year. All owners, managers, and staff members should be familiar with both state and federal civil rights and fair housing laws.

In-house training must be approved by MHDC. If training is to be conducted in-house by an "Employer Trainer" (an employee of the owner/management company who will provide training to other staff), the 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 must be available upon request.

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

Both types of training must provide specific skills and knowledge necessary for operating a successful tax credit or other program. The curriculum below outlines key skills and information owners, property managers and site staff will need:

- An Overview of The Low Income Housing Tax Credit Program
- An Overview of The HOME Program
- The Applicable Fraction
- The Student Rule
- How to Qualify a Unit
- Income Calculation and Verification
- Physical Inspections
- Income Averaging
- The Next Available Unit Rule
- The Unit Vacancy Rule
- Monitoring Procedures
- Compliance Reporting
- Fair Housing
- Mandatory Compliance Period
- Extended Use Period
- Annual Certifications
- Resident File Maintenance

The above curriculum may be conveyed in a lecture or on-line training format. There is no hourly requirement.

The effectiveness of the training will be measured during site inspections and in looking at the success of the property and or management portfolio overall. Participation in training is mandatory and MHDC compliance staff may, at their discretion, mandate additional trainings for those management personnel/companies that:

1. Exhibit trends in noncompliance;
2. Are issued non-corrected 8823's; or
3. Otherwise demonstrate a need for basic or advanced compliance training.

Properties with staff responsible for day-to-day operations such as qualifying households who have not completed program training that satisfies MHDC's training requirements will be placed in non-compliant status.