



2024 AOC REPORT **UPDATES**

QUICK REFERENCE GUIDE

FOR OWNERS/MANAGEMENT AGENTS



This 2024 AOC Report Updates Quick Reference Guide is designed to provide additional details to owners and management agents regarding the updates, changes, additions, and removals made to the annual owner certification (AOC) Report.

Use this Update Guide as an awareness to the changes made to the prior year's AOC Report and to aide in preparing for submission the 2024 AOC Report.

This Guide is separated into the Report components that align with the revised AOC Report format.

OVERVIEW

In accordance with Federal Statute 26 CFR 1.42-5 Section (c)(1), housing tax credit (HTC) development owners must annually certify compliance with the tax credit program. To this end, an AOC Report is required to be submitted to the Mississippi Home Corporation's Compliance Monitoring Division of ALL developments that received an award of HTCs (confirmed by MHCs issuance of IRS form 8609) AND has met the targeted applicable fraction by 12/31 of the reporting period.

PART A: OWNER CERTIFICATION OF CONTINUING PROGRAM COMPLIANCE (OCCPC)

Key Updates



An owner of a HTC development must certify, under a penalty of perjury, that the development/building/low-income unit adheres to all applicable federally mandated program requirements. The OCCPC Report is the certification report chosen by MHC to fulfil said federal mandate.

- **Questions 4 – [Student Rent Declaration]** – Deleted. This question has been shifted to the Supplemental Certification of HTC Compliance Form (#9) due to the inability of our Software Provider to update the OCCPC electronic form with state-specific questions.

- **Questions 14 – [State Obligations]** – Deleted. This question has been shifted to the Supplemental Certification of HTC Compliance Form (#6) due to the inability of our Software Provider to update the OCCPC electronic form with state-specific questions.
- **Question 18 – [VAWA]** – Deleted. In accordance with the 2023 Compliance Monitoring Plan, a VAWA Certification is encouraged but not required. To this awareness, this question was removed as an owner’s required certification.
- **Question 19 - [Casualty Loss]** – Deleted. This question has been shifted to the Supplemental Certification of HTC Compliance Form (#11) due to the inability of our Software Provider to update the OCCPC electronic form with state-specific questions.
- **Electronic Submission** – [No Change.] Electronic submittal of the OCCPC Report remains a requirement. However, owners must carefully and thoroughly ACCURATELY complete all questions based on activity that took place during the report period. Previously, due to MHCs inability to test for federal and state-specific compliance using the electronic OCCPC Report, accuracy before submittal was not required. This year, since the state-specific questions have been removed, the accuracy of the information PRIOR TO submittal is vital.

PART B: SUPPLEMENTAL CERTIFICATION OF HTC COMPLIANCE

Key Updates



The Supplemental Certification of HTC Compliance (Part B) is utilized to ensure compliance with state specific requirements by examining an owner’s compliance with certain point selection criteria as stipulated in the governing QAP for the development. The Supplemental Certification (Part B) has been revised to add six (6) additional state-specific questions and attachments and correct grammatical mistakes. Additional revised forms/exhibits have also been added.

- **Questions 1 – [Deeper Income/Rent Targeting]** Revised. Reference to Special Needs Housing Unit Status Report added (previously the Deeper Targeting Set-Aside Log).
- **Questions 4 – [Special Needs Population Obligation]** Revised. Syntax correction and reference to Special Needs Housing Unit Status Report added (previously the Deeper Targeting Set-Aside Log).
- **Question 5 – [Development/Community Services]** Revised. Verbiage added inquiring about an owner’s compliance/maintenance of elected and required community services at the development during the report period.
- **Question 6 – [Common Areas/Significant Amenities]** Revised. Verbiage added inquiring about an owner’s compliance/maintenance with staff units and significant amenities at the development during the report period.
- **Question 7 – [Single-Family Lease Purchase]** Revised. Verbiage added inquiring about an owner’s commitment to provide single-family homeownership opportunities to low-to moderate income families. Reference to Homeownership Conversion Plan added.
- **Question 8 - [Development-based Rental Assistance DBRA]** – Revised. The DBRA Chart has been shifted to Part B - Exhibit B as an attachment to the Supplemental Certification Report. The DBRA Chart remains a report requirement of owner’s required to provide owner rental assistance and one day during the report period, including arrearage payments.

- **Question 9 – [Student & Rent Declaration]** – Added. This state-specific question has been added from the OCCPC Report to track an owner’s adherence to reporting and record-keeping requirements of existing, previously qualified LI households.
- **Question 10 – [PHA Waiting List] – NEW.** Added. This question has been added to monitor an owner’s commitment to reach out to the applicable PHA first for housing opportunities to households with Section 8 Vouchers when leasing/re-leasing vacant units.
- **Question 11 – [Casualty Loss]** – Added. This state-specific question has been added from the OCCPC Report to track an owner’s adherence to reporting requirement when a development experiences a significant physical condition/casualty loss incident resulting in a building/unit being out of service for a period equal to or greater than 30-days.
- **Questions 12-13 – [Emergency Housing] – NEW.** This question has been added to track temporary housing provided to households displaced by a federally declared natural disaster during the report period, and the affordability status of the LI unit as of 12/31 of the report period.
- **Part B – Exhibit A: Special Needs Housing & Deeper-Income Targeting Unit Status Report.** Revised. This report has been created as a consolidation of the Special Needs Population & Deeper-Income Targeting Logs to better capture the information needed for compliance monitoring and status tracking.
- **Part B – Exhibit B: Development-based Rental Assistance (DBRA) Activity Report.** Revised. This DBRA Chart has been shifted as a separate Exhibit to the Supplemental Certification Report whereas to collect information separately for developments/owner’s required to provide private rental assistance to select LI households.
- **Part B – Exhibit C: Notice of Physical Damage & Casualty Loss.** Revised. This report has been added as an exhibit to question #11 to collect a status update for developments that experienced a significant physical condition/casualty loss incident which resulted in a building/unit being out of service for a period equal to or greater than 30-days during the report period.

PART C: OCCUPANCY (RENT ROLL) REPORT

Key Updates



The Occupancy (Rent Roll) Report which is designed to capture all occupancy activity of a LIHC unit remains unchanged during the covered reporting period.

- **None.**

PART D: DEVELOPMENT FINANCIAL ANALYSIS REPORT (DFAR) CERTIFICATION

Key Updates



The Development Financial Analysis Report (DFAR) is a report utilized by MHC to track the financial activity of a HTC development as well as the funding of the development’s replacement and operating reserve accounts.

- **NEW.** Added. This report has been added to streamline the annual reporting obligations of an HTC development. Audited financials and a copy of the year-end bank statements for the replacement and operating reserve

accounts must now be remitted along with the other AOC Report components (if applicable) for developments operating in the initial 15-year compliance period. Developments operating in its extended use period (EUP) as of the beginning of 2023 are required to complete PART D of the AOC Report. NOTE: The inclusion of the DFAR Certification as a part of the owner’s annual AOC Report obligation will eliminate the need for a separate DFAR submittal/review (previously due to MHC late August/September annually).

PART E: PROPERTY POINT OF CONTACT FORM

Key Updates



The Property Primary Point of Contact form has been added to ensure MHC records are regularly updated to reflect the current individual(s) overseeing the management and operations of the affordable development. Collecting annual information on the points of contact for a project is crucial for maintaining effective communication, ensuring accountability, and facilitating seamless communication between MHC, the owner and management agents.

- **NEW.**

AUTHORIZED SIGNATORY



*The AOC Report must be signed AND dated by the owner of record (e.g., Managing Member or General Partner) for the ownership entity/development. The signature of a member **other than the General Partner, Managing Member or key principal** WILL NOT be accepted. A copy of the Operating Agreement, Bylaws, Resolutions and Minutes must be remitted with the AOC Report to support ANY change in the owner of record/approved signatory authority for the ownership entity since the latest AOC Report remitted to MHC.*

SUBMISSION INSTRUCTIONS



Before finalizing the annual report for submittal to MHC, carefully review content to ensure the submittal aligns with Program Bulletin #24-1103 and this Update Guide. AOC Reports received that are incomplete,

IMPORTANT SUBMISSION INSTRUCTIONS

Following ARE IMPORTANT submission instructions required with each AOC Report submittal:

Report Component	Submission Instructions
Electronic Submission Requirement:	The OCCPC AND Occupancy Report components of the AOC Report are to be submitted electronically via MHCs Certification Online (COL) portal AND is applicable to ALL program participants.
Manual Submission Requirement:	The OCCPC Report (Part A), Supplemental Certification of HTC Compliance Report (Part B), the Development Financial Analysis (DFAR) Certification Report (Part D) , and Property Primary Point of Contact Report (Part E) are

	report components required to be submitted by ALL program participants, AND MUST BE transmitted manually via email to MHC at compliance.htc@mshc.com as ONE PDF file. These report components must be signed/dated by the owner of record for the development, notarized (where applicable), prior to final submittal.
AOC Report Email:	The AOC Report for the development must be submitted to MHC as a SINGLE, FILE with the subject line labeled: [PROJECT NO. – PROJECT NAME – 2024 AOC Report] .

2024 AOC Report Due Date

The 2024 AOC Report, all components, exhibits, and attachments must be remitted to MHCs Compliance Monitoring Division at compliance.htc@mshc.com and via the agency's Certification Online (COL) portal on or before 11:59 a.m., Friday May 31, 2024.

If you have any questions regarding the 2024 AOC Report, do not hesitate to reach out to a member of the Compliance Monitoring Division at:

Compliance.htc@mshc.com

(601) 718-4642