

Question Category	Questions (as of 1-24-25)	FAQ Answer (as of 1-24-25)
Assets	Will WSHFC follow HOTMA change allowing for current balance instead of six month average for checking accounts? And if checking account has to be third party verified, then one bank statement can be used?	Yes, see page 5-20 of Updated Tax Credit Manual.
Assets	At move in we are counting their income from assets even if it is under \$50,000?	Yes, actual income from assets is always counted, regardless of total net family asset amount.
Income Inclusions and Exclusions	Cost of Living Adjustment (COLA): Per section B.3 of Notice H 2023-10, O/As must apply COLA to any incomplete certifications that are effective January 1 or later of the upcoming year on the day after SSA has announced the COLA. Some agencies have interpreted the guidance to mean that COLA must be applied to all certifications with effective dates after the date the increase was announced (not just certifications effective 1/1 or later). Can you please clarify WSHFC's COLA guidance?	Because the tax credit program does not require or perform interim reviews, an impending COLA would only be applied at a new move in on a pro-rated basis or additionally at an annual recertification at mixed income properties. No adjustments will be made after a move-in, or once a recert has been completed. For example. A household is pre-qualified in October with an anticipated MI date of February. In November, the COLA is announced. This certification would need to be reevaluated and the COLA would need to be applied. We would not expect management to go back and redo recerts already completed once the COLA is announced.
Income Inclusions and Exclusions	Does WSHFC expect income to be calculated differently under HOTMA? For example, we've seen some agencies modify their guidance to remove references to anticipated income and year-to-date calculations and instead require the TIC calculation to be based on "actual amounts received". Additionally, we've seen many agencies disregard the 12-month lookback that was introduced under HOTMA and instead continue to calculate income based on current circumstances.	Please review Chapter 5 of our revised Manual. If income is the same amount at every payment, then current income is used. If income amounts vary, then historical data will need to be used, particularly for wages, but this could also apply to child support, for example. Self-employment will require use of tax returns. So the type of income and the amount and frequency of receipt will determine what is calculated.
Other WSHFC Changes effective 1/1/2025	Can you please clarify if WSHFC is adopting the streamlined income determination rules outlined in section I.8 of Notice H 2023-10?	Per IRS regulations, we allow 100% affordable tax credit properties to use a Self-Certification form for every recertification, so no recalculation or reverification of income/assets is required. IRS regulations require that mixed income tax credit properties process full third-party recertifications annually, so no streamlined income determination is allowed at mixed income properties.

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Verification Hierarchy	If The Work Number is used for employment verification, what does WSHFC recommend for calculating income? In the training it was just mentioned not to use data older than 12 months. Can we average two most current pay periods to be in line with HOTMA?	Per Chapter 5, if you are not using up-front verification, then you must use a minimum of the 2 most current, consecutive paystubs. Depending on rate of pay, that could cover a two week period or up to a two month period. As long as you have two most current and consecutive paystubs, that will satisfy the minimum requirement. HOTMA's Level 4 pay stub verification requirement is not a ceiling, it is a minimum requirement. If you are using up front verification and see variable pay, base the calculations on an average from the data you receive, up to 12 months worth. Do not ask for more than 12 months of data from an up-front verification service.
Verification Hierarchy	Are there any changes to how we would calculate farmworker income?	There are 2 aspects to qualifying a farmworker. Nothing has changed regarding how to verify they meet the Farmworker definition and have earned \$3,000 from farm work. To determine if they income qualify for the LIHTC program, follow updated HOTMA guidance. see Verification hierarchy in manual.
Verification Hierarchy	When verifying employment, is BVS the preferred verification? What about anticipating overtime when using BVS? Does BVS take all this into consideration?	Per revised Chapter 5 of Manual and revised FAQs, the Commission does not endorse any particular up-front verification source. That said, BVS is good for non-wage sources of income. Wages may need to be verified with another up-front source or with pay stubs.
Verification Hierarchy	Can you please clarify if WSHFC will accept safe harbor verification from any of the programs outlined in section J.4 of Notice H 2023-10? If yes, which programs, and will WSHFC allow the verification to be used at MI/IC and AR?	We have not decided if we'll accept 50058s in lieu of all verification documentation from public housing authorities. If we decide to implement this we will publish the change. For now we are not implementing this allowance.
Verification Hierarchy	When bank statements are used to verify a checking account, will WSHFC permit the use of only 1 bank statement rather than the previous 6-statement requirement? If so, would WSHFC use the current balance rather than the 6-month average?	Yes, see page 5-20 of Updated Tax Credit Manual
Verification Hierarchy	he November 15th training indicated that WSHFC will accept the \$50,000 Asset Self-Certification. Can this form be used at Move-In if the household certifies net family assets are at or below \$50,000?	Our new applicant questionnaire (replacement for current REA) will have an under \$50K statement on it that household's can attest to. This will be done at new move in if household declares less than \$50K in net family assets.