

To: Real Estate Department Partners

Notice: **RED-23-58**

From: Real Estate Department

Date: December 8, 2023

Re: **Compliance Updates- HOTMA, NSPIRE, Forms, and Manuals**

HOTMA Resource Update

The [IHCD compliance webpage](#) now includes the slides and recording from the 11/29/2023 HOTMA training, as well as other HOTMA resources including the HOTMA final rule and the HOTMA Implementation Notice. These items are under a new header labeled “HOTMA.”

NSPIRE Resource Update

The [IHCD compliance webpage](#) now includes the slides and recording from the 11/27/2023 NSPIRE training webinar, as well as other NSPIRE resources including the NSPIRE final rule and NSPIRE standards. These items are under a new header labeled “NSPIRE.”

Compliance Form Revisions

IHCDA has released two revised compliance forms now available on the [IHCD compliance webpage](#).

These forms were primarily updated for HOTMA compliance, but other minor revisions were also made as explained below.

- Form #23: Income Certification Questionnaire
 - Question #2- new question about other federal or state rental assistance
 - Question #4- added clarification about seasonal workers and day laborers
 - Question #5- added clarification not to count birthday or holiday gifts or nonmonetary items received from a foodbank or similar organization as recurring income
 - Question #8: Added SSDI
 - Question #13: Changed child support question from amounts entitled to receive to amounts received
 - Question #14: Changed alimony question from amounts entitled to receive to amounts received
 - Question #17: Updated question on student financial assistance to match HOTMA compliance
 - Question #18: Zero-income question updated to acknowledge will require completion of a zero-income certification form
 - Question #19: Now asks for current balance of checking account, not six-month average balance
 - Removed question about retirement accounts. Per HOTMA, retirement accounts are never counted as assets.



- Question #34: updated question with HOTMA definition of other non-necessary personal property and instructions to not count necessary personal property as assets
- Form #26: Under \$50,000 Asset Certification
 - Updated from \$5000 to \$50,000
 - Removed note that the form is only applicable to the tax credit program
 - Removed line for retirement accounts. Per HOTMA, retirement accounts are never counted as assets.
 - Added HOTMA definition of other non-necessary personal property and instructions to not count necessary personal property as assets

As a reminder, IHCD Form #23 is a mandatory form and must be implemented for all files with an effective date on or after 3/1/24.

Other HOTMA form revisions were released and summarized in [RED Notice 23-56](#).

Update on Tenant Income Certification Forms

Tenant Income Certification forms revised for HOTMA are almost completed. IHCD thanks its partners for their continued patience. The forms will be released next week as drafts and IHCD will allow a one-week testing and comment period to allow partners to test the logic and calculations in the PDF fillable forms. Additional instructions will be released via RED Notice.

Revised Compliance Manuals

The *Rental Housing Tax Credit Compliance Manual* and *Federal Programs Ongoing Rental Compliance Manual* were updated in November 2023 with an effective date of January 2024 to reflect HOTMA and NSPIRE changes, as announced in [RED Notice 23-54](#).

The manuals have been reposted with the following minor updates:

- A typo that stated new forms were mandatory for files with an effective date on or after 3/1/23 has been updated to correctly state the effective date of 3/1/24
- The list of compliance forms included in the Table of Contents has been updated to reflect all new and revised HOTMA compliance forms