

Form 001 - Initial Tax Credit Compliance Reporting

New Projects, Initial Reports and Fees:

The ownership entity receives the IRS Form 8609 for each building in the project, with Part I completed and signed by WHEDA. Following issuance of the Form 8609 a "welcome letter" is sent to the owner indicating which reports are due and the amount of monitoring fees due.

Some of the compliance reporting that includes unit information and tenant data may be submitted by using our online reporting system known as RCRS (Rental Compliance Reporting System). Information concerning the access and use of this system can be found in the RCRS User's Guide which is located on www.wheda.com

*The following reports and fees must be submitted **within 30 days of this letter**. A \$50.00 late fee will be assessed for each form and corresponding documentation that is not submitted by the specified due date.*

HTC Form 100, Owner's Certificate of Continuing Program Compliance

As required by the IRS, an Owner's Certificate of Continuing Program Compliance must be **submitted initially and annually** to WHEDA. The Certification covering the period from the placed-in-service date through the preceding year is due with the first report due date for the project.

HTC Form 200, Unit Status Reports (USR)

An initial Unit Status Report must be submitted for each building in the project. All events for the project that occurred on or after the placed-in-service date are reportable. The initial report should include all events for all units within the project. This includes move-in or move-out information for all low-income and all market households, as well as re-certifications or adjustments for low-income households.

The Unit Status Report(s) may be submitted on paper using HTC Form 200. **Unit Status Reports received in paper form will be assessed an additional fee of \$30 per unit.* The USR may also be submitted electronically. (A number of companies offer software programs with the ability to produce electronic Unit Status Reports. If you would like more information, please contact a member of the tax credit monitoring staff.) Electronic submission of unit status report(s) will need to be **submitted over the internet on an annual basis** using the Rental Compliance Reporting System (RCRS). Instructions for using RCRS can be found in the RCRS User's Guide on www.wheda.com

HTC Form 205 A & B, Utility Allowance

Submit HTC Form 205 Parts A and B, "Utilities Information" along with documentation for the utility allowance(s) in place from the **placed-in-service date**. ****Annual submission is also required** - Submit HTC Form 205 Parts A and B, "Utilities Information" along with documentation for the utility allowance(s) 90 days prior to effective date for the properties that utilized the following calculation methods:

- **Local Utility Company estimate**
- **HUD Schedule Model**
- **Energy Consumption Model**

HTC Form 205 E, Utility Allowance Period Election Form

Submit HTC Form 205 E electing the 12 month effective period for the project. ****This report is only due initially, unless there is a change in the effective month.**

IRS Form 8609

A copy of the first year Form 8609 filed with the IRS for each building – the form must be a copy of the signed and completed form filed with the IRS and must show the eligible basis and qualified basis of the building.

- If the owner has elected to defer the credit until the year following the placed-in-service date, WHEDA *must be notified in writing within 30 days of receiving the Welcome Letter packet*. Additionally, the owner must submit a copy of the filed 8609 no later than May 31st of the following year.
- If Line 8b of IRS Form 8609 is checked indicating the building is part of a multiple building project, a copy of the addendum identifying the buildings that are grouped into each “project” must also be attached, according to IRS instructions on Form 8609.

Multifamily Quarterly Occupancy Report (MQOR)

The online Multifamily Quarterly Occupancy Report (MQOR) is **submitted over the internet on a quarterly** basis. The purpose of the report is to gather occupancy status as of the last day of each quarter. Go to eWHEDA services to submit reports or to sign-up for eWHEDA.

Compliance Monitoring Fees

As Wisconsin’s housing credit agency, WHEDA is required by law to conduct compliance monitoring on all projects that have been placed-in-service for which the Credit is or has been allowable at any time since the inception of the Program in 1987. Fees are charged to cover staff, technology, and other associated costs necessary to conduct compliance monitoring. ***Please see the enclosed invoice detailing the monitoring fees due at this time.***

Automated Clearing House (ACH) Payment

Payments will be drawn via ACH. If you have not submitted an ACH agreement, contact Diane Packard @ 608-267-2996, Tracy Hendrickson @ 608-267-2815, or Nate Meuer @ 608-264-6858.

Initial Compliance Fee

The initial compliance fee for developments of 15 or fewer units is \$800. For developments with 16 or more units, the fee is \$55 per unit with a maximum of \$5,000.

Annual Monitoring Fee

Fees are charged annually on a per unit basis for all units within each project, including market rate and manager’s units. The Annual Monitoring Fees are due on or around March 15th of each year during the project's compliance period. Fees are charged based on the type of reporting medium used. WHEDA reserves the right to adjust fees on an annual basis.

Unit Status Reports Submitted Electronically in WHEDA's Required XML Format

Financed by:	Per Unit Fee
Rural Development	\$30
WHEDA	\$30
All other	\$45

**Unit Status Reports received in paper form: an additional \$30 per unit fee will be assessed.*

Late Fee

Failure to comply with any monitoring requirement, including payment of fees, may result in one or more of the following actions:

A late charge will be assessed for documentation or fees that are not received by the due date. Late fees will be charged as follows:

Annual Monitoring Fee

- Minimum late charge of \$50.00

Required Documentation or Reports

- \$50.00 late charge for each missing report or documentation
- Future allocations of Credit to the owner and affiliated entities may be jeopardized.
- Future participation in other WHEDA programs by the owner and affiliated entities may be jeopardized.
- Any legal enforcement available to WHEDA
- Notification to IRS

ONGOING REPORTING REQUIREMENTS

The following reports and fees must be submitted on the specified due dates for the remainder of the compliance period. *A \$50.00 late fee will be assessed for each document that is not submitted by the specified due date.* Please refer to the compliance manual for complete requirements.

Reporting Schedule for All Property Types listed by Report Type

Report or Fee	Due Date			
Owner's Certificate of Continuing Compliance (HTC Form 100)	January 31			
Unit Status Report (RCRS online reporting or HTC 200)	January 31			
Multifamily Quarterly Occupancy Report (MQOR)	January 15	April 15	July 15	October 15
Annual Compliance Monitoring Fee	On or about March 15 th of each year			
Copy of filed Form 8609 (see page 2)	May 31			
Utility Allowance Form 205 Parts A & B, and all applicable documentation	Due 90 days prior to effective date			

Additional Reporting for Properties with ***TCAP Funding*** listed by Report Type

Report or Fee	Due Date			
Audited Financials	Within 60 days after the end of each fiscal year			
Copy of IRS Form 1065			July 1st	
Copy of IRS Form 8586			July 1st	
Copy of IRS Form 8609			July 1st	
Copy of IRS Schedule A			July 1st	

Additional Report for Properties with ***Exchange (1602) Funding*** listed by Report Type

Report or Fee	Due Date			
Audited Financials	Within 60 days after the end of each fiscal year			
Copy of Federal Income Taxes			July 1st	
Copy of State Income Taxes			July 1st	

WHEDA's tax credit Compliance Manual and forms are available on the Internet at www.wheda.com

For further information on Unit Status reporting requirements, refer to HTC Form 201, "Unit Status Report Instructions".