
AHP Compliance - Required Documents

Rental Projects



Project Monitoring for Compliance

All projects receiving an award of Affordable Housing Program (AHP) funds through the Competitive AHP are subject to monitoring by the FHLB Cincinnati. Projects are monitored to ensure that AHP funds are used in accordance with the approved AHP application and the governing AHP Regulation.

Projects awarded AHP funds must obtain and maintain certain documentation to verify that households occupying the project are in compliance with all income and occupancy commitments made at the time of application for the full 15-year retention period. FHLB will periodically request the required documentation to complete periodic project audits. Owners must make available the required documents upon request.

The following must be attained for each household occupying the project at least, but no more than 120 days prior to initial move-in.

- Rental application
- Lease Agreement
- Third party income verification for each household member 18 or over
- Third party verification of special needs (if project committed to serve this population)
- Third party verification of homeless (if project committed to serve this population)

An exception is made for shelter projects (see AHP Implementation Plan for ‘shelter’ definition). A shelter is not required to obtain third party income or special needs verification if the information is shown on the application/intake form *and* the intake form is signed by a licensed professional and tenant.

Rental Application

A rental application, or intake form, must be completed for each household moving into the project. It is not necessary to complete an application for each adult, all information may be provided on one form. For tax credit or other government funded projects, a signed Tenant Income Certification from initial move-in may be submitted in place of a rental application. The following information must be provided on the application to meet FHLB requirements.

- Date of initial occupancy/move-in date (shelters only)
- Unit number and unit size (shelters only)
- Tenant name or tenant ID number

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- Household size (total number of household members)
 - Household composition (list of all household members and their ages)
 - Total annual household income
 - Source of income for each adult household member (*age 18 or older unless child is receiving SS/SSI which is considered adult's income*)
 - Fair Housing statement and/or logo
 - Signature of household member
 - Date of application completion

Lease Agreement

A lease is required for all non-shelter projects. The FHLB does not require a new lease be completed each year that a tenant remains in the same project unit. A new lease is needed if a household leaves the project and then moves back at a later date, or, if a household transfers to a new unit. If leases are not completed annually, addendums and/or rent increase documentation will be requested to verify current rent amounts as part of the audit. The following should be included on the lease to meet FHLB requirements:

- Tenant name (head of household)
- List of all household members occupying the unit
- Property address
- Unit number and unit size (bed, SRO, efficiency, 1bdm, 2bdm, etc.)
- Lease term (should be for at least 6 months)
- Fair Housing logo or statement
- Amount of rent to be paid by tenant
- Total contract rent (tenant paid rent plus any rental subsidy)
- Signature of tenant and project owner/property manager
- Date lease was signed

Verification of Income

Income must be verified for each adult (18 or over) in the household. Income must be dated in the move-in year and no more than 120 days prior to initial move-in. Exceptions to the 120 days would be social security letters, VA letters, and other documentation only provided annually. Some examples of third-party income verification are stated below. See the FHLB Income Guide at <https://www.fhlbcin.com/media/zehi1plz/income-eligibility-guide.pdf> for a complete list of acceptable forms of verification.

- Two consecutive pay stubs or a verification of employment (VOE) for employment income
- Social security or supplemental income benefits letter
- Two years of signed tax returns for self-employment
- VA benefits letter

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- Court document, print-out from child support agency, etc. to verify child support
 - Print-out of unemployment benefits
 - Certification of zero income if an adult is not receiving income

Verification of Special Needs

Documentation that a household meets one of the FHLB's definition of special needs is only needed if the project committed to serve the population. Only one household must meet one of the definitions of special needs. Verification documents must be dated in the tenant's move-in year and no more than 120 days prior to the move-in date. The type of documentation required will vary depending on the category of special needs the household falls.

- A signed and dated letter from a physician or licensed practitioner, psychiatrist, psychologist, or clinical social worker that clearly states the condition that qualifies the household under the AHP "Special needs" definition (see the AHP Implementation Plan for full definition)
- A copy of the SSI or SSDI statement or similar federal or state government agency statement from which disability benefits are being received
- A signed and dated letter from a licensed physician, psychiatrist, psychologist, or clinical social worker attesting that treatment is being provided to the resident (to verify chemical dependency special needs only)
- A signed and dated letter from a shelter project owner certifying that they are providing housing at the project location to protect the applicant or a member(s) of the household from physical or emotional abuse (to verify physical or emotional special needs only)
- Discharge or emancipation paperwork from an agency or the foster care/court system to verify aging out of foster care special needs
- A copy of the photo ID or birth certificate of the resident to verify a household member is 60+

Verification of Homeless Household

Documentation that a household meets one of the FHLB's definition of homeless household is only needed if the project committed to serve the population. Households meeting this criterion must have been literally homeless prior to entering the project. FHLB definition may differ from other funds. Verification of homeless status must be dated within 120 days of initial move-in. Acceptable forms of documentation are as follows:

- A signed and dated letter from shelter or transitional housing personnel or a case manager, social worker, or similar authority that clearly states the condition that qualifies the household under the AHP "Homeless household" definition. For example, the household lives in overcrowded housing, living on the street or in car, fleeing a domestic violence situation, etc.
- A copy of notice of eviction, foreclosure, or condemnation of residence
- Discharge or emancipation paperwork from an agency or the foster care/court system
- Evidence that the household's current residence meets the FHLB's definition of a "Mobile Home". Meaning the home does not meet the requirements of the National Manufactured

Housing Construction and Safety Standards Act, Title VI, Public Law 93-383; 42 USC 5401, appearing at 24 CFR 3280, et seq., generally referred to as “pre-1976 mobile homes. This can be in the form of Property Value Assessment (PVA), title document, appraisal, or other approved documentation.

Questions

If you have any questions regarding the compliance process or the documentation required for compliance, email us at AHPmonitoring@fhlbcin.com or contact us by phone at (888) 345-2246. To access all housing resources, webinars, manuals, etc. visit our website www.fhlbcin.com under Housing Programs.