

Comparisons between Housing Programs

This is **NOT** a complete list but a sample of some of the differences between programs.

	Public Housing	Project Based Section 8	LIHTC
Audits	<ul style="list-style-type: none"> *In-House Compliance *Outside Auditor *HUD 	<ul style="list-style-type: none"> *In-House Compliance *Outside Auditor *CHFA-MF Division(for HUD) 	<ul style="list-style-type: none"> *In House Compliance *Investor Compliance *CHFA – TC Division *Outside Auditor
Citizenship	<ul style="list-style-type: none"> *Non-Citizenship Rule *Pro-rated rent based on the Maximum Rent Schedule *Declaration of Citizenship for Family 	<ul style="list-style-type: none"> *Pro-rated Rent based on the contract rent *Owner & Family Summary; *Declaration of Citizenship from each family member 	<ul style="list-style-type: none"> *No Penalties for Non Citizens per IRS Code *Ownership Discretion
Compliance Forms	<ul style="list-style-type: none"> *50058 *Tenant Choice of Rent Income Disregard *Community Service * FSS Program; *Homeownership Program *30 day notice of rent increase *Annual Recertification *HUD 9886 *PHA Release of Authorization 	<ul style="list-style-type: none"> *50059 *Rights & Responsibility Brochure *How your Rent is Determined *Ethnic/Race Data *30 day notice of rent increase *Initial Notice; 120 day, 90 day; 60 day Reminder Notice *Annual Recertification *HUD 9887 & HUD 9887A Fact Sheet *PHA Release of Authorization 	<ul style="list-style-type: none"> *Tenant Income Certification (TIC) *Exhibit Forms – see CHFA website *WCMS Annual Reporting *Ownership Release of Authorization

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Dual Subsidy	*PIC system will reject 50058	*HAP will not be paid for number of days of duplicate subsidized program	*May be penalized on tax credits if household member claimed in another household or program and not solely in TC household
Eligibility Criteria	*Meet Income Limits *Passes Criminal Background; *Good Landlord Reference *Proof of SS #; Birth Certificates, *Meet Definition of Family	*Meet Income Limits *Passes Criminal Background; *Good Landlord Reference *Proof of SS #; Birth Certificates, *Meet Definition of Family	*Meet Income Limits *Passes Criminal/Credit Background *Good Landlord Reference *Proof of SS #; Birth Certificate *Ownership Management Plan Criteria
Full Time Students	*Students allowed	*Student Eligibility Rule	*No Full Time Students unless they meet one of the 4 exceptions
Funding Source	*Operating Subsidy	*HAP Payment	*Tax Credits to Investors *No Tenant Subsidy of Rent
Income Limits	*80% AMI	*80% AMI	*30%; 40%;50%,60% AMI depending on designation
Inspections	*REAC Inspection *HUD Inspections *Annual PM & Housekeeping Inspection	*REAC Inspection *CHFA Inspection *HUD Inspection *Annual PM & Housekeeping Inspection	*Lender Inspection *CHFA Inspection *Ownership Inspection (investor) *Annual PM & Housekeeping Inspection
Late Charges	*PHA determines (DHA \$10.00 at 14 day notice & an additional \$15.00 at 3-day Demand)	*\$5.00 on the 6 th business day and \$1.00 every day after	*Ownership determines
Lease Term & Vacate Notice Required	*PHA Lease Lease must a minimum of 12 months *10 day notice to vacate	*HUD Model Lease Lease must be a minimum of one year – *30 day notice to vacate	*Ownership lease Lease must be a minimum of six months (although recertification every year) *30 day notice to vacate

Legal Notices Non-Payment Only	*14 day Notice *3-day Demand	*10 day Notice *3 day Demand	*3 day Demand
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Minimum Rent	*PHA Minimum Rent \$0 - \$50	*Minimum Rent \$25	*Cannot exceed Maximum Rent determined by HUD for designated AMI of unit
Permissible Deductions/Concessions	*May adopt permissible deductions (i.e. child support paid outside of household is a deduction)	*No permissible deductions	*Concessions are given to promote leasing goals
Pets	*Pets allowed	*No Pets allowed in family units	*Owner's discretion
Policies & Procedures	*Agency Plan *Admissions and Continued Occupancy Policy *5-year Plan *Physical Needs Assessment	*Tenant Selection Plan *Affirmative Fair Housing Marketing Plan	*Management Plan
Regulations	*24 CFR 5, 960,966 Code of Federal Regulations	*HUD Handbook 4350.3 24 CFR 247	*Section 42 of the IRS Code * Chapter 5 of HUD Handbook 4350.3
Rent calculation	*Rent calculated at 30% of gross income after allowable deductions or 10% of gross income whichever is greater *Flat Rent	*Rent Calculated at 30% of gross income after allowable deductions or 10% of gross income whichever is greater *Contract Rent	*Maximum rent minus utility allowance determined by HUD for the bedroom size or more if market is good. *Maximum rents are set by HUD along with the Income Limits Annually
Security Deposit	*PHA Designation (DHA - \$50 for 1 bdm; \$75 for 2-5 bedroom \$125 for dispersed/scattered sites)	*Sec deposit = 1 month's rent or \$50 (whichever is greater)	*Ownership/Management sets deposit
Unborn Children	*Unborn children are not counted in the household	*Unborn children are counted in the household	*Unborn children are counted in the household
Utilities	*May charge excess Utilities or Utility Allowance	*Utility Allowance	*Utility Allowance

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Verification Tool	*EIV system DDHS	*EIV system DDHS	*Third Party Verifications on all income – Assets only verified if over \$5,000

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