



STATE OF MICHIGAN

GRETCHEN WHITMER  
GOVERNOR

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY  
LANSING

GARY HEIDEL  
ACTING EXECUTIVE DIRECTOR

April 29, 2019

TO: Owners & Management Agents of ALL MSHDA monitored properties

FROM: Nathan Thelen, Compliance Manager  
Mike Witt, Director of Asset Management

SUBJECT: HUD Carbon Monoxide Detection  
MSHDA Carbon Monoxide Detector Inspection Process  
IRS Final Regulations for Housing Credit Compliance Monitoring

**Subject: Carbon Monoxide Detectors in HUD-Assisted Housing**

<https://www.hud.gov/sites/dfiles/OCHCO/documents/19-06pihn.pdf>

**IRS Final Regulations for Housing Credit Compliance Monitoring**

<https://www.federalregister.gov/documents/2019/02/26/2019-03388/amendments-to-the-low-income-housing-credit-compliance-monitoring-regulations>

**IMPORTANT NOTES on CO Detectors:**

Starting immediately, during site and desk reviews MSHDA Asset Managers and MOR Specialists will be asking if developments currently have working CO Detectors in each unit. If not, they will be recommending that each unit have a CO Detector installed (RR Eligible). MSHDA Inspectors will also place their findings in the GENERAL COMMENT section for the rest of 2019.

Starting January 1, 2020 CO Detectors will be part of the MSHDA Physical Inspection process as a (L3) item which will require a correction no later than 60 days after report issued. Installation/replacement of CO Detectors will be a Replacement Reserve eligible item.

HUD anticipates issuing further guidance and instructions on this important public health issue.



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### **IMPORTANT NOTES on IRS Final Regulations:**

Starting January 1, 2021 these Final Regulations will be enforced. Including these key notes:

\*Require Credit agencies to inspect at least as many units as specified by project size in the Low-Income Housing Credit Minimum Unit Sample Size Reference Chart

\*Maintain the "all buildings" rule, which requires Credit agencies to conduct on-site inspections in units in all buildings in a project, rather than simply applying the minimum unit sample size on a project-wide basis if a project encompasses multiple buildings

\*Shorten the reasonable notice requirement to 15 days in advance of when a project will experience a physical inspection or review of low-income certification, down from a 30-day notice requirement under the temporary regulations.

If you have any questions about this Memorandum, please contact me at 517-373-6405 or [theleenn5@michigan.gov](mailto:theleenn5@michigan.gov)