

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

Texas Regulatory Efficiency Office (TREO) Rule Recommendations

Disclaimer

The Texas Regulatory Efficiency Office (TREO) is required to coordinate with state agencies to review agency rules and recommend potential amendments to, or repeals of, those rules. On April 27, 2026, TREO released a draft Regulatory Efficiency Review (RER) report of possible regulatory changes that the Texas Department of Housing and Community Affairs (the Department) could make to improve efficiency in some of its rules. A report is attached. The recommendations in the report are not mandates or directives, but rather are ideas and opportunities for improvement. TREO has requested that the Department share these ideas with stakeholders for a 14-day period to garner feedback.

It should be noted that this feedback period is a separate additional step from the rulemaking process that will follow. Specific rule language changes for each rule discussed in the report will still be presented to the Board of the Department as a draft, released for public comment and returned to the Board for final adoption.

The specific rules reflected in the report with recommendations include 10 TAC:

- §1.8, Camping Plan Requirements and Process for Political Subdivisions
- §2.401, Enforcement, General
- §6.2, Community Affairs Programs, Definitions
- §7.40, Emergency Solutions Grant Program, Competitive Program Participant Services Selection Criteria
- §8.6, 811 PRA Program Rules, Program Regulations and Requirements
- §10.401, Asset Management Rules, Housing Tax Credit and Tax Exempt Bond Developments
- §10.402(b), Asset Management Rules, Requests for Subordination Agreements, HUD Amendments to Restrictive Covenants, or HUD Riders to Restrictive Covenants
- §10.405, Asset Management Rules, Amendments and Extensions
- §10.407, Asset Management Rules, Right of First Refusal
- §10.614, Compliance Rules, Utility Allowances
- §10.801, Affirmative Marketing Requirements
- Chapter 11, Qualified Allocation Plan, specifically including:
 - §11.1, General
 - §11.6, Competitive HTC Allocation Process
 - §11.9, Competitive HTC Selection Criteria
 - §11.101, Site and Development Requirements and Restrictions
 - §11.201, Procedural Requirements for Application Submission
 - §11.204, Required Documentation for Application Submission
 - §11.302, Underwriting Rules and Guidelines
 - §11.303, Market Analysis Rules and Guidelines
- §13.11, Multifamily Direct Loan Rules, Post-Award Requirements
- Chapter 21, Minimum Energy Efficiency Requirements for Single Family Construction Activities
- Chapter 28, Taxable Mortgage Program
- Chapter 29, Texas Single Family Neighborhood Stabilization Program Rule

Those providing public feedback are encouraged to reference the specific recommendation number in the report related to their comment. Please be aware that all feedback submitted to the TDHCA will be considered public information.

Public Comment

Public Comment Period: Start: 8:00 a.m. Austin local time on April 30, 2026
End: 5:00 p.m. Austin local time on May 14, 2026

Feedback received after 5:00 p.m. Austin local time on May 14, 2026, will not be accepted. Written remarks may be submitted electronically within the designated time period to: brooke.boston@tdhca.state.tx.us.

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Regulatory Efficiency Office

Regulatory Efficiency Review

Texas Department of Housing and Community Affairs (TDHCA)

DRAFT REPORT BY RULE

April 27, 2026

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Regulatory Efficiency Review Order of Operations

Step 1. TREO coordinates Regulatory Efficiency Review with TDHCA.

- a. TREO generates preview background on TDHCA and its regulatory framework.
- b. TREO sends TDHCA a cover letter, the Regulatory Efficiency Review template, the Texas Regulatory Impact Matrix (TRIM) tool, and the Regulatory Reduction Guide.

Step 2.1. TDHCA Conducts Self-Evaluation Regulatory Efficiency Review

- a. TDHCA notifies staff and external stakeholders that the Regulatory Efficiency Review process has started.
- b. TDHCA conducts a self-evaluation review using the materials provided by TREO (Step 1.b.)
- c. TDHCA submits the completed self-evaluation review documents to TREO.

Step 2.2. TREO Conducts Regulatory Efficiency Review.

- a. TREO conducts a Regulatory Efficiency Review of the TDHCA rules.
- b. TREO compiles the TDHCA self-evaluation review (Step 2.1.) and TREO's review (Step 2.2.a.) into a comprehensive Agency Regulatory Efficiency Review, which contains recommendations on the rules to be amended, repealed, or both

Step 3. TREO Shares Regulatory Efficiency Review with Advisory Panel.

- a. TREO provides the Regulatory Efficiency Review to the Advisory Panel for its analysis and input.

Step 4. TREO, TDHCA, and OOG Collaborate on Regulatory Efficiency Review.

- a. TREO consults internally with Office of the Governor (OOG) Budget and Policy staff on the Regulatory Efficiency Review.
- b. TREO meets with the TDHCA to discuss the comprehensive Agency Regulatory Efficiency Review and any implementation considerations.

Step 5. TDHCA Solicits External Stakeholder Feedback on Regulatory Efficiency Review.

- a. The Agency allows 14 days for external stakeholder feedback on the TDHCA Regulatory Efficiency Review by engaging stakeholders or using other methods for soliciting feedback from external stakeholders. This step of soliciting external stakeholder feedback is a separate, additional step from any processes the agency uses during the standard rulemaking process under Government Code, Chapter 2001 (See Step 7.1.)

Step 6. TREO and TDHCA Finalize Recommendations.

- a. TREO and the Agency evaluate the external stakeholder feedback and potential impacts on the TDHCA Regulatory Efficiency Review and determine the next steps: rule changes, statutory action, or both.

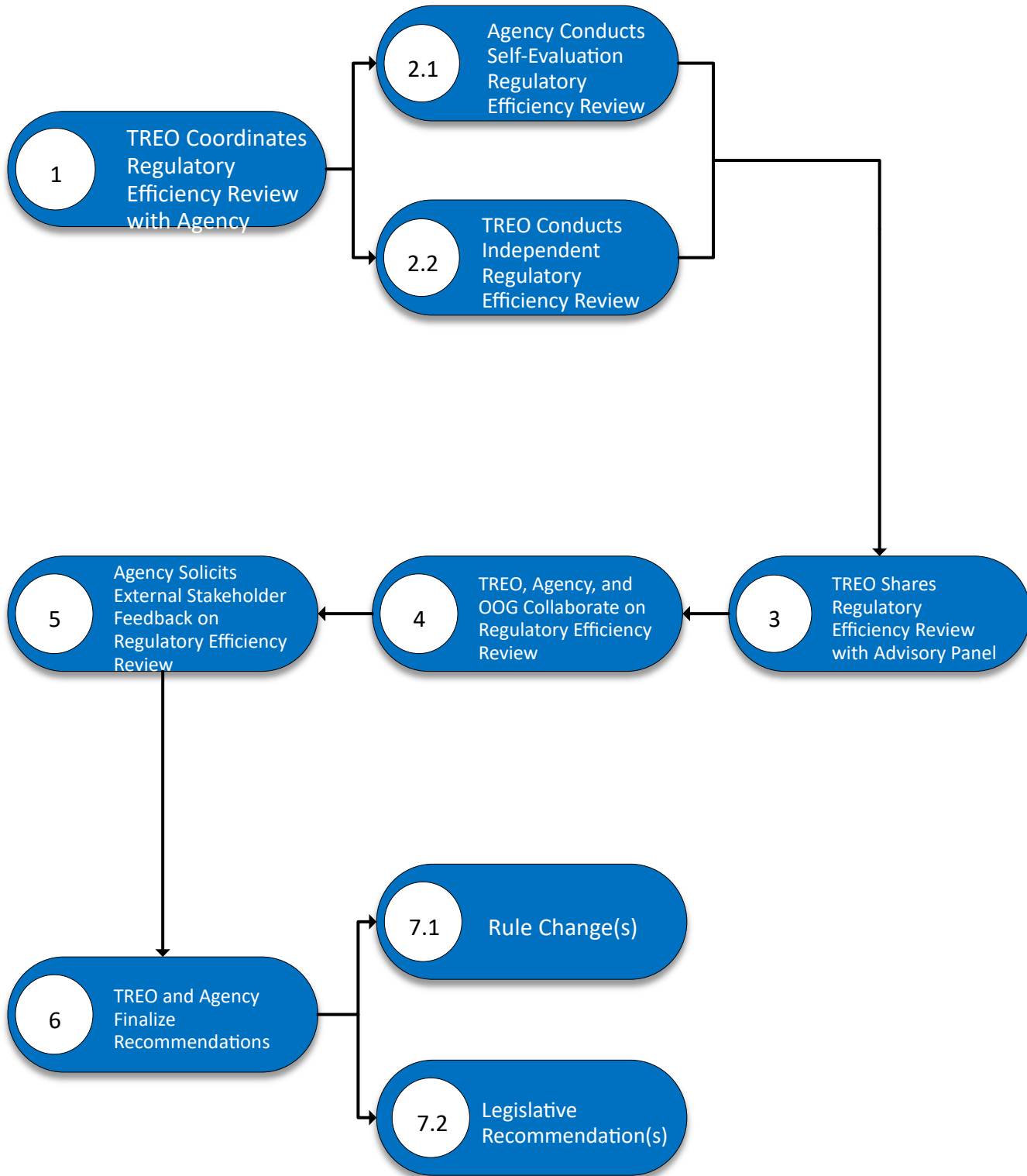
Step 7.1. Rule Changes.

- a. TDHCA begins the standard rulemaking process under Government Code, Chapter 2001. As with standard rulemaking, TDHCA submits the full proposed rules package to OOG Budget and Policy; additionally, the package is submitted to TREO.

Step 7.2. Legislative Recommendation.

- a. TREO will prepare and provide a report of any identified legislative recommendations to the Legislature.

Regulatory Efficiency Review Workflow



Texas Department of Housing and Community Affairs – Regulatory Review

Executive Summary:

Texas Department of Housing and Community Affairs is the state's lead agency for affordable housing and community services, administering the Low-Income Housing Tax Credit Program, multifamily direct loan programs, manufactured housing regulations, homeless assistance grants, and homebuyer assistance under broad rulemaking authority granted by Tex. Gov't Code §2306.053. Based on our review, Texas Department of Housing and Community Affairs administers 414 active rules. Each assessment is organized with the rule citation, heading, statutory authority, authority type, reduction category, recommended agency action, word count analysis, and effective dates.

TDHCA Assessment

Assessment 1: 1.8

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 1, Section 1.8 – Camping Plan Requirements and Process for Political Subdivisions
Rule Heading	Camping Plan Requirements and Process for Political Subdivisions
Statutory Authority	Tex. Gov. Code Chapter 2306, Subchapter PP
Authority Type	Permissive
Reduction Category	Unnecessary Requirements
Recommended Agency Action	Repeal. TDHCA stated that the rule provides the procedure for how to submit a plan. That type of detail does not require being in rule, as the statute is specific already. The rule will be removed; however the procedure will continue to be available on the Department's website consistent with statute.
Current Word Count	2,639
Anticipated Word Count	0
Word Count Delta	2,639
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 2: 10.402(b)

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 10, Section 10.402 – Requests for Subordination Agreements, HUD Amendments to Restrictive Covenants, or HUD Riders to Restrictive Covenants
Rule Heading	Requests for Subordination Agreements, HUD Amendments to Restrictive Covenants, or HUD Riders to Restrictive Covenants
Statutory Authority	Tex. Gov. Code Chapter 2306
Authority Type	Permissive
Reduction Category	Unnecessary Requirements
Recommended Agency Action	Repeal. TDHCA stated that the rule provides a list of what must be included with a submission. That type of detail does not require being in rule and will be moved to the Post Award Activities Manual on the Department's website.
Current Word Count	143
Anticipated Word Count	0
Word Count Delta	143
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 3: 10.801

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 10, Section 10.801 – Affirmative Marketing Requirements
Rule Heading	Affirmative Marketing Requirements
Statutory Authority	Applicable on some programs per HUD regulations
Authority Type	Permissive
Reduction Category	Unnecessary Requirements
Recommended Agency Action	Amend. TDHCA stated to 1) Remove reference to obsolete federal form. 2) Specific Affirmative Marketing Requirements are currently noted as applicable for all properties in the Department's MF portfolio greater than 5 units. These requirements are only actually federally required of a much smaller portion of the portfolio. This rule revision would reduce who the is subject to the rule down to only those properties for which it is federally required. 3) Reduce word count.
Current Word Count	726
Anticipated Word Count	650
Word Count Delta	76
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 4: Chapter 11

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 11, Qualified Allocation Plan (QAP)
Rule Heading	Qualified Allocation Plan
Statutory Authority	IRC Sec 42 and TGC Chapter 2306, Subchapter DD
Authority Type	Mandatory
Reduction Category	Duplicative
Recommended Agency Action	Amend. TDHCA stated that the QAP is a very long set of rules. The Department had already initiated steps to begin to do a rewrite of this entire chapter.
Current Word Count	88,060
Anticipated Word Count	75,000
Word Count Delta	13,060
Register Publication Date	9/18/2026
Rule Effective Date	12/31/2026

Assessment 5: Chapter 21

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 21, Minimum Energy Efficiency Requirements for Single Family Construction Activities
Rule Heading	Minimum Energy Efficiency Requirements for Single Family Construction Activities
Statutory Authority	TGC Chapter 2306.187
Authority Type	Mandatory
Reduction Category	Duplicative
Recommended Agency Action	Amend. TDHCA stated that this chapter can now be consolidated into 10 TAC Chapter 20 governing the Single Family Programs and word reduction will be planned.
Current Word Count	1,088
Anticipated Word Count	1,000
Word Count Delta	88
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 6: Chapter 28

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 28, Taxable Mortgage Program
Rule Heading	Taxable Mortgage Program
Statutory Authority	N/A
Authority Type	Permissive
Reduction Category	Duplicative
Recommended Agency Action	Repeal. TDHCA stated that 10 TAC Chapter 27 and Chapter 28 are rules for two distinct programs but are very repetitive; the title for Chapter 27 could be expanded to address both programs enabling (with minor revisions) the deletion of Chapter 28.
Current Word Count	1,765
Anticipated Word Count	0
Word Count Delta	1,765
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 7: Chapter 29

Field	Detail
Rule Citation	Title 10, Part 1, Chapter 29, Texas Single Family Neighborhood Stabilization Program Rule
Rule Heading	Texas Single Family Neighborhood Stabilization Program Rule
Statutory Authority	N/A
Authority Type	Permissive
Reduction Category	Obsolete
Recommended Agency Action	Repeal. TDHCA stated that the Single Family NSP activity is no longer an active program at TDHCA.
Current Word Count	934
Anticipated Word Count	0
Word Count Delta	934
Register Publication Date	5/22/2026
Rule Effective Date	8/17/2026

Assessment 8: [10 TAC §11.9 — Competitive HTC Selection Criteria](#)

Recommended Changes:

8.1. The Opportunity Index criteria in subsection (c)(5)(B) could be consolidated and simplified. Currently there are 16 sub-categories of nearby amenities for urban areas and 13 for rural areas, each with specific distance thresholds and detailed qualifying criteria. Many of these amenities overlap conceptually (e.g., indoor and outdoor recreation facilities are separate items, library hours are specified to the exact number). The Department could consolidate related amenity types into broader categories (e.g., 'recreation facilities' instead of separate indoor and outdoor items) and adopt a simplified proximity framework with fewer tiers, reducing compliance burden for applicants who must document each amenity separately with maps, distance measurements, and verification evidence.

TDHCA Noted: ok with this

8.2. The detailed measurement and mapping requirements in subsection (a)(1) could be streamlined. The requirement for physical maps showing boundary-to-boundary distances including ingress/egress and easements for every scored facility represents a significant documentation burden. The Department could allow applicants to use standardized GIS or mapping tools with automated distance calculations rather than requiring manual boundary-to-boundary measurements, reducing preparation time per application.

TDHCA Noted: leave in for feedback

8.3. The Quantifiable Community Participation (QCP) provisions in subsection (d)(4) could be simplified. The current six-tier point structure with detailed certification requirements, a challenge procedure with rigid 7-day response windows, a fact-finder process, and extensive limitations on technical assistance creates significant procedural complexity. The Department could reduce the number of point tiers (e.g., from six to three: support, neutral, opposition) and streamline the challenge process.

TDHCA Noted: leave in – ok with this

8.4. The Pre-application Participation criteria in subsection (e)(3) contain 11 separate consistency requirements (A through K) that must be maintained between pre-application and full application to earn 6 points. Several of these requirements are duplicative of threshold requirements or could be consolidated. For example, requirements about the development site not changing (G), the tie-breaker distance not changing (H), and notification requirements being consistent could be combined into a single site-consistency requirement. Preapplication process is required to be in rule per statute. See TGC 2306.6704. But simplifying is up to agency

TDHCA Noted: leave in for feedback

8.5. The blanket no-rounding policy in subsection (a)(1) adds rigidity to the scoring process that may generate administrative deficiencies and disputes over minor rounding differences. The Department could adopt a reasonable rounding standard (e.g., to two decimal places) that provides clarity while reducing needless deficiency findings.

TDHCA Noted: ok with this

8.6. The Input from Community Organizations criteria in subsection (d)(6) could be consolidated with the QCP provisions in subsection (d)(4), as both address overlapping aspects of community support. Currently, applicants must navigate two separate scoring items with distinct requirements for functionally similar input.

TDHCA Noted: ok with this

8.7. The Cost of Development per Square Foot criteria in subsection (e)(2) could be simplified by consolidating the multiple cost thresholds and conditions into fewer tiers. The current structure has separate thresholds for building cost vs. hard cost, new construction vs. rehabilitation, and additional conditions for opportunity index-qualifying rehabilitation, resulting in six different threshold paths that add complexity.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code §2306.053(b)(4) (general rulemaking); Tex. Gov't Code §2306.67022 (QAP adoption); Tex. Gov't Code §2306.6710 (evaluation and scoring); Tex. Gov't Code §2306.6725 (scoring of applications); Tex. Gov't Code §2306.6704 (preapplication process); IRC §42(m)(1)(B)-(C) (federal allocation criteria)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements; Excessive Requirements

Assessment 9: [10 TAC §11.1 — General](#)

Recommended Changes:

9.1. The extensive definitions subsection (d) could be streamlined by removing definitions that merely restate statutory terms from Tex. Gov't Code Section 2306.6702 or IRC Section 42 without adding regulatory specificity. Where the regulation simply restates a statutory definition verbatim, a cross-reference to the statute would be sufficient. This could reduce definitional redundancy and make the regulation easier to maintain when statutory definitions are amended.

TDHCA Noted: ok with this

9.2. The cross-referencing provisions linking Chapter 11 to Chapter 10 and other departmental rules could be consolidated into a single clear applicability statement rather than being scattered throughout the regulation. Multiple cross-references to the same related chapters create maintenance challenges and potential inconsistencies when one chapter is amended but the cross-references in another are not updated.

TDHCA Noted: ok with this

9.3. The scoring methodology provisions that specify exact point values and weights could be organized more clearly with a summary table or matrix format, reducing the dense prose that currently describes the point system. While the statutory scoring priorities under Section 2306.6710 and Section 2306.6725 must be maintained, the Department has discretion to present this information in a more accessible format that reduces the compliance effort required for applicants to understand the scoring system.

TDHCA Noted: wants to get feedback. Scoring items have dense text so want to make sure there is clarity, but could be too long, but can draft the table and get feedback. Also add this in QAP feedback.

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4) (Department powers and duties); Tex. Gov't Code §§ 2306.6701-2306.6733 (Subchapter DD — Low Income Housing Tax Credit Program); Tex. Gov't Code § 2306.67022 (Qualified Allocation Plan); Tex. Gov't Code § 2306.111 (Housing Funds); Tex. Gov't Code § 2306.1111 (Uniform Application and Funding Cycles); IRC § 42(m)(1) (federal qualified allocation plan requirement)

Field	Detail
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 10: [10 TAC §11.101 — Site and Development Requirements and Restrictions](#)

Recommended Changes:

10.1. The Undesirable Site Features provisions in subsection (a)(2)(E) include distance thresholds (300 ft, 500 ft, 2 miles, 10 miles) that have not been updated to reflect advances in environmental assessment methodology. The Department could consider adopting a performance-based standard that references professionally conducted environmental site assessments rather than prescribing rigid distance buffers for each feature category. This would allow qualified developments near mitigated features to proceed without the cost and delay of seeking waivers, while still protecting resident health and safety.

TDHCA Noted: ok with this

10.2. The Neighborhood Risk Factor provisions in subsection (a)(3) rely on a single third-party data source (neighborhoodscout.com) for crime rate data. Anchoring regulatory eligibility to a commercial website introduces fragility — if that source changes methodology or ceases operations, the rule becomes difficult to apply. The Department could reference a broader class of accepted crime data sources or allow applicants to use official law enforcement data as a primary submission.

TDHCA Noted: ok with this

10.3. The minimum rehabilitation cost thresholds in subsection (b)(3) (\$25,000 and \$35,000 per unit) could be modernized by indexing them to an inflation measure, consistent with the approach the Legislature already directed for per-square-foot cost thresholds in GC 2306.67022(b). Static dollar thresholds become outdated as construction costs change, requiring repeated rule amendments.

TDHCA Noted: want to keep in for stakeholder feedback

10.4. Several provisions reference outdated or static technology assumptions. For instance, subsection (b)(4)(A) requires 'connections available using current technology for data and phone'

— the phone connection element may be unnecessary as telecommunications have evolved. The Department could update this to reflect modern connectivity expectations.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code §§ 2306.053(b)(4), 2306.053(b)(10), 2306.67022, 2306.6710, 2306.6725, 2306.6722, 2306.6730, 2306.257, 2306.185, 2306.187; Tex. Gov. Code § 2001.004
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Excessive Requirements; Unnecessary Requirements

Assessment 11: [10 TAC §11.302 — Underwriting Rules and Guidelines](#)

Recommended Changes:

11.1. The regulation contains numerous fixed dollar thresholds and percentage parameters that are not indexed to inflation or otherwise updated automatically. The Department could consider consolidating these into a single published schedule or appendix that can be updated by reference through an annual NOFA or Board resolution, rather than requiring a full rulemaking each time market conditions shift. Specific examples include the miscellaneous income range (\$5-\$30/unit/month), replacement reserve minimums (\$250/\$300 per unit), and general contractor fee dollar thresholds (\$2 million/\$3 million). This approach would reduce rulemaking overhead and keep parameters current with market conditions.

TDHCA Noted: want to keep in for stakeholder feedback

11.2. The 5% tolerance threshold used for evaluating whether an Applicant's EGI, total operating expenses, and NOI are 'reasonable' compared to the Underwriter's independent estimates appears in at least three separate places within the regulation (subsections (d)(1)(D), (d)(2)(L), and (d)(3)). The Department could consider stating this standard once in a general provisions subsection and cross-referencing it, reducing repetitive language.

TDHCA Noted: ok with this

11.3. The regulation includes highly granular procedural detail about DCR adjustment priority orders, identity of interest definitions, and seller note requirements that, while operationally important, could be moved from the rule text to the Multifamily Procedures Manual (which is

already referenced in subsection (d)(4)(iv)). This would preserve the substantive standards in rule while allowing operational procedures to be updated more efficiently. The Department could retain the key thresholds and standards in rule while relocating step-by-step procedural sequences to the Manual.

TDHCA Noted: want to keep in for stakeholder feedback

11.4. The operating expense line-item taxonomy in subsection (d)(2)(A)-(L) is highly prescriptive. While some standardization is valuable for consistency, the Department could consider whether all twelve categories need to be individually defined in rule, or whether some could be consolidated or specified in guidance. For example, General and Administrative Expense, Payroll Expense, and Repairs and Maintenance Expense descriptions could potentially be simplified.

TDHCA Noted: want to keep in for stakeholder feedback

11.5. The feasibility conclusion section (subsection (i)) contains multiple overlapping capture rate thresholds for different development types. The Department could consider presenting these in a table format rather than narrative paragraphs, which would improve readability and reduce word count while preserving the same substantive standards.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code §2306.053(b)(4); Tex. Gov't Code §2306.148; Tex. Gov't Code §2306.185(b); Tex. Gov't Code §2306.081(c); Tex. Gov't Code §2306.67022; Tex. Gov't Code §2306.6710(d); Tex. Gov't Code §2306.6711(b); IRC §42(m)(2); 24 CFR Parts 92 and 93
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 12: [10 TAC §11.204](#) — Required Documentation for Application Submission

Recommended Changes:

12.1. The Rural/Urban Designation requirements in paragraph (5)(B) could be simplified. The current six-factor analysis with its December 15 pre-submission deadline and multi-step staff confirmation process is elaborate for what is essentially a population and geography determination. The Department could streamline this into a simplified self-certification process with population-based bright-line thresholds, with the Department retaining authority to audit or challenge designations.

TDHCA Noted: want to keep in for stakeholder feedback

12.2. The Operating and Development Cost Documentation in paragraph (7) could be modernized. Specifically, the \$20,000 per-unit threshold for requiring a CPA letter on site work costs included in Eligible Basis has not been updated for construction cost inflation and could be raised. The Department could also allow electronic submission of utility allowance documentation rather than requiring the specific exhibit formats described.

TDHCA Noted: want to keep in for stakeholder feedback

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4); Tex. Gov't Code § 2306.141; Tex. Gov't Code § 2306.6701; Tex. Gov't Code § 2306.6705; Tex. Gov't Code § 2306.6706; Tex. Gov't Code § 2306.6707; Tex. Gov't Code § 2306.67041; Tex. Gov't Code § 2306.67055; Tex. Gov't Code § 2306.67071; Tex. Gov't Code § 2306.6710; Tex. Gov't Code § 2306.6722; Tex. Gov't Code § 2306.6730; Tex. Gov't Code § 2306.6734; 26 U.S.C. § 42
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements; Excessive Requirements

Assessment 13: [10 TAC §10.614 — Utility Allowances](#)

Recommended Changes:

13.1. The eight worked examples (Examples 614(1) through 614(8)) scattered throughout the regulation add approximately 800-1,000 words. While illustrative, these could be consolidated into a single companion guidance document or published FAQ maintained by the Department on its website. The regulation could include a single reference directing readers to published examples. This would significantly reduce regulatory word count without reducing compliance clarity.

TDHCA Noted: ok with this

13.2. The Actual Use Method provisions in subsection (c)(3)(E) contain highly prescriptive procedural requirements including specific Excel spreadsheet column specifications, zero-usage data exclusion rules, and a 45-day processing commitment. The Department could simplify these provisions to state the minimum sample size requirement and data standards, while publishing detailed submission instructions on its website. This would give the Department flexibility to update technical procedures without rulemaking.

TDHCA Noted: ok with this

13.3. The submission requirements in subsection (o) reference a specific system (CMTS) and specific field values ('Utility Allowance Documents' as document type, 'Utility Allowance' as TDHCA Contact). Similarly, subsection (k)(6)(A) specifies a particular email address (UA-Application@tdhca.texas.gov). Embedding specific technology platform names and email addresses in regulatory text creates maintenance challenges when systems change. These operational details could be adopted by reference or replaced with a reference to submission instructions published on the Department's website.

TDHCA Noted: ok with this

13.4. The multiple specific URLs embedded throughout the regulation (HUD portal links, Power to Choose, HUD Utility Schedule Model, Texas Comptroller) create a maintenance challenge as URLs change over time. While the regulation includes '(or successor URL)' language, the Department could consolidate all external references into a single Department-maintained links page referenced once in the regulation.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.053(b)(4) (general rulemaking); Tex. Gov. Code § 2306.053(b)(10)

Field	Detail
	(administer federal housing programs including LIHTC); Tex. Gov. Code § 2306.185 (long-term affordability of multifamily rental developments); Tex. Gov. Code § 2306.6701 (purpose of LIHTC program); Tex. Gov. Code § 2306.6719 (compliance monitoring); Tex. Gov. Code § 2001.004 (APA rulemaking requirements); IRC § 42(g)(2)(B)(ii) (gross rent includes utility allowance); Treas. Reg. § 1.42-10 (utility allowance methods for LIHTC); 24 CFR § 92.252 (HOME rent limits including utility allowance); 24 CFR § 93.302 (NHTF rent limits including utility allowance)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 14: [10 TAC §8.6 — Program Regulations and Requirements](#)

Recommended Changes:

14.1. The enumeration of specific HUD Housing Notices by number in subsection (d) could be replaced with a general incorporation-by-reference clause (e.g., 'all applicable HUD Housing Notices as amended or superseded from time to time'). This would eliminate the need to amend the regulation each time HUD issues, revises, or supersedes a Housing Notice, reducing administrative processing time for the Department. Several of the listed notices date from 2012 and may already have been superseded.

TDHCA Noted: want to keep in for stakeholder feedback

14.2. The iterative correction processes in subsections (f)(2) (EIV Policies and Procedures) and (j)(5) (House Rules/Development Policies) could be streamlined. Rather than requiring repeated submission and correction cycles, the Department could provide standardized templates or checklists that Owners could self-certify against, with the Department retaining the right to review on a risk-based or sampling basis. This would reduce processing time for both Owners and Department staff.

TDHCA Noted: want to keep in for stakeholder feedback

14.3. The specific notification timelines scattered across multiple subsections — 30 days for Use Agreement delivery (e)(1), 30 days for rent increase requests (h)(8), 7 days for vacancy notification (l)(4), 3 business days for household changes (l)(6), 3 calendar days before issuing Notices to Vacate (l)(8), and 180 days for initial lease-up notification (l)(3) — could be consolidated into a single notification schedule table or appendix. This would make compliance easier for property owners by providing a single reference point rather than requiring them to track multiple scattered deadlines throughout a lengthy regulation.

TDHCA Noted: want to keep in for stakeholder feedback

14.4. The advertising materials requirement in subsection (i)(1), which enumerates eight separate categories of materials the Owner must provide upon execution of the Property Agreement, could be simplified. The Department could allow Owners to provide a link to a digital property listing or portfolio that contains this information, rather than requiring separate submission of floor plans, brochures, tenant selection criteria, house rules, unit counts, accessibility documentation, transportation access documentation, and amenity descriptions as individual items. This aligns with modern property management practices where this information is already maintained digitally.

TDHCA Noted: ok with this

14.5. The specific URL reference in subsection (n) (<https://www.tdhca.state.tx.us/section-811-pra/index.htm>) could be replaced with a general reference to the Department's 811 PRA webpage, which would avoid the need to amend the regulation if the URL changes.

TDHCA Noted: ok with this

14.6. The environmental law enumeration in subsection (p)(1), listing 16 specific federal and state environmental statutes by name, could be simplified with a general reference to 'all applicable federal, state, and local environmental laws and regulations' since the opening clause already contains that general language, making the detailed enumeration redundant.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.053(b)(4); Tex. Gov. Code § 2306.111; Tex. Gov. Code § 2306.092; Tex. Gov. Code § 2306.082; 42 U.S.C. § 8013; 24 CFR Part 891
Authority Type	Mixed

Field	Detail
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 15: [10 TAC §11.201 — Procedural Requirements for Application Submission](#)

Recommended Changes:

15.1. The reference to the Department's 'secure web transfer server' (ServU http file) in paragraphs (1)(C) and (6) is technology-specific. As the Department transitions to the Multifamily Management System, the rule text could reference the Department's designated electronic submission system generically, avoiding the need for rule amendments each time the technology platform changes.

TDHCA Noted: ok with this

15.2. The fee-error cure period of three business days with no extensions (paragraph (1)(A)) is notably shorter and more rigid than the five-business-day general deficiency period. The Board could consider aligning these timelines for simplicity, as fee calculation errors are typically easy to identify and cure.

TDHCA Noted: ok with this

15.3. The Challenges to Neighborhood Organization Opposition process in paragraph (8) could be streamlined. The current provision establishes a fact-finder process with final, non-appealable determinations for a narrow question (whether opposition statements are contrary to findings of a local governmental entity). The Board could consider whether this elaborate procedure is proportionate to the issue it addresses, or whether the Department could resolve such challenges through its existing staff review process.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.053(b)(4); Tex. Gov. Code § 2306.1111; Tex. Gov. Code § 2306.67022; Tex. Gov. Code § 2306.6704; Tex. Gov. Code § 2306.6705; Tex. Gov. Code § 2306.6708; Tex. Gov. Code §

Field	Detail
	2306.67041; Tex. Gov. Code § 2306.6710; Tex. Gov. Code § 2306.6715; Tex. Gov. Code § 2001.004
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 16: [10 TAC §10.407 — Right of First Refusal](#)

Recommended Changes:

16.1. The seven-item content specification for notification letters in subsection (c)(3)(B) could be simplified by providing a standardized Department-approved notification template that development owners could use, rather than prescribing content elements that must be independently assembled for each transaction.

TDHCA Noted: ok with this

16.2. The 30 business day review timeline in subsection (d) could be shortened. Thirty business days (approximately 6 calendar weeks) is a significant delay in a commercial real estate transaction context. The Department could consider a 15-20 business day review period, particularly given that many of the documentation items are standardized.

TDHCA Noted: ok with this

16.3. The elaborate satisfaction (subsection (f), 4 scenarios) and non-satisfaction (subsection (g), 6 scenarios) frameworks could be consolidated. Several of the non-satisfaction scenarios in subsection (g) are essentially the inverse of satisfaction scenarios in subsection (f) with minor variations. A simpler approach would define satisfaction criteria and state that failure to meet those criteria constitutes non-satisfaction, rather than enumerating every permutation.

TDHCA Noted: want to keep in for stakeholder feedback

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.6726; Tex. Gov't Code § 2306.6725(b)(1); Tex. Gov't Code § 2306.053(b)(4), (b)(10); Tex. Gov't Code § 2306.6713; Tex. Gov't

Field	Detail
	Code § 2306.186(e); Tex. Gov't Code § 2001.004; 26 U.S.C. § 42(i)(7)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 17: [10 TAC §11.303 — Market Analysis Rules and Guidelines](#)

Recommended Changes:

17.1. The highly prescriptive 13-item report content checklist in subsection (d) could be consolidated and simplified. Several items — Title Page (d)(1), Letter of Transmittal (d)(2), Table of Contents (d)(3), Photographs (d)(11), Appendices (d)(12), and Qualifications (d)(13) — are standard professional report elements that an approved Qualified Market Analyst would include as a matter of professional practice. Rather than prescribing each of these in rule text, the Department could consolidate these formatting requirements into a shorter provision requiring conformance with a Department-published Market Analysis template or checklist maintained outside the TAC. This would allow the Department to update formatting expectations without rulemaking while keeping the substantive analytical requirements in rule.

TDHCA Noted: ok with this

17.2. The eight required PMA narrative discussion items in subsection (d)(8)(B)(i)(I)-(VIII) are extremely granular. Several of these (e.g., (VII) — discuss and quantify current and planned single-family and non-residential construction, and (VIII) — other housing issues in general, if pertinent) could be consolidated into a general catch-all requiring the analyst to discuss all factors material to PMA definition. This would reduce word count without sacrificing analytical rigor and give Market Analysts more professional discretion in tailoring their analysis to site-specific conditions.

TDHCA Noted: ok with this

17.3. The six-item qualification submission list in subsection (c)(1)(A)-(F) could be streamlined. Specifically, requiring both (D) general experience information and (F) a sample Market Analysis is potentially duplicative — the sample analysis itself demonstrates experience and competency. The Department could consider accepting a sample analysis in lieu of the separate experience narrative, reducing submission volume for applicants. Additionally, the requirement in (c)(1) that analysts submit at least one analysis every 12 months or re-submit items (A), (B),

(C), and (E) by October 1st to remain on the list creates administrative tracking overhead. A two-year recertification cycle with continuing education or attestation could achieve the same quality assurance with less friction.

TDHCA Noted: ok with this

17.4. The 12-item comparable development data sheet in subsection (d)(8)(C) could be reduced. Items like (iv) property condition, (vii) description of concessions, (viii) list of unit amenities, (ix) utility structure, and (x) list of common amenities could be consolidated into a single requirement for 'development characteristics relevant to comparability,' trusting the approved analyst's professional judgment.

TDHCA Noted: ok with this

17.5. The reference to 'December 31, 2024' in subsection (d)(10)(E)(ii)(I) as the HTC Property Inventory date is a hard-coded calendar reference that will become stale. This date-specific reference could be replaced with a dynamic reference such as 'the HTC Property Inventory published on the Department's website as of December 31 of the year preceding the Application Acceptance Period,' avoiding the need for annual rule amendments to update the date.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.053(b)(4); Tex. Gov. Code § 2306.67055; Tex. Gov. Code § 2306.67022; Tex. Gov. Code § 2306.1111; Tex. Gov. Code § 2306.6710; IRC § 42
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 18: [10 TAC §7.40 — Competitive Program Participant Services Selection Criteria](#)

Recommended Changes:

18.1. The most significant modernization opportunity in this regulation is consolidation of the extensively duplicated scoring criteria. The four program components (street outreach,

emergency shelter, homeless prevention, and rapid re-housing) each contain seven scoring categories, and at least five of those seven are repeated with virtually identical text — matching funds, serving homeless subpopulations, positive housing exits, staff qualifications, and experience. The Department could consolidate these into a single general scoring table that applies to all four components, with a short supplementary table noting only the criteria that differ by component (housing placement targets and services breadth). This consolidation alone could reduce the regulation's word count by approximately 40-50%, making it substantially easier for applicants to understand and apply.

TDHCA Noted: ok with this

18.2. The five-tier percentage thresholds for serving Homeless Subpopulations (70/80/90/95/100%) could be simplified to three tiers (e.g., 70%/85%/100%) without reducing the Department's ability to differentiate among applicants. Fewer tiers reduce application complexity and the Department's scoring workload while still rewarding greater commitment to serving vulnerable populations.

TDHCA Noted: want to keep in for stakeholder feedback

18.3. The staff qualifications criteria reference the "Texas Behavioral Executive Health Council" for licensed mental health providers. The Department could verify this name reflects the current licensing body and consider broadening the criterion to recognize other relevant professional credentials (e.g., Licensed Professional Counselors, Licensed Clinical Social Workers) to expand the pool of qualified applicants.

TDHCA Noted: ok with this

18.4. The services breadth criteria (paragraph 6 in each component) could be simplified by setting a minimum number of required services and a maximum point threshold, rather than listing incremental point values for each additional service. This would reduce prescriptive detail while preserving the incentive for comprehensive service delivery.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4), (b)(10); Tex. Gov't Code § 2306.001(6); Tex. Gov't Code § 2001.004; 42 U.S.C. § 11372 (Grant Assistance); 42 U.S.C. § 11374 (Eligible Activities); 24 CFR § 576.1; 24 CFR § 576.202; 24 CFR § 576.400
Authority Type	Mixed

Field	Detail
Reduction Category	Duplicative; Streamlining Opportunity; Unnecessary Requirements

Assessment 19: [10 TAC §11.6 — Competitive HTC Allocation Process](#)

Recommended Changes:

19.1. The hard-coded reference to the '2024 State of Texas Competitive Housing Tax Credit Ceiling Accounting Summary' in paragraph (3)(E) could be replaced with a year-neutral reference such as 'the current program year' to avoid the need for annual textual amendments. This is a low-cost change that reduces administrative overhead.

TDHCA Noted: ok with this

19.2. The Force Majeure provisions in paragraph (5) and the Unforeseen Short-term Delay provisions in paragraph (6) together constitute approximately 1,100 words of highly detailed procedural text. While the underlying reallocation policy is required by §2306.111(h), the Department could consolidate these two paragraphs into a single, streamlined credit-return framework with tiered criteria (one tier for events that prevent completion within six months, another for events that do not). This could reduce redundancy between the two provisions — both share similar evidentiary requirements, financial feasibility checks, and carryover agreement procedures — while maintaining the substantive policy distinctions.

TDHCA Noted: ok with this

19.3. The Supportive Housing Target Population caps in paragraphs (3)(C)(v) and (3)(C)(vi) could be consolidated into a single provision using a population-threshold formula (e.g., 'one development per subregion, plus one additional in subregions containing a county with population of at least 2,500,000') rather than two separate paragraphs. This consolidation would reduce word count without changing the substantive rule.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code §2306.053(b)(4); Tex. Gov't Code §2306.111(d), (d-1), (d-2), (d-3); Tex. Gov't Code §2306.1115; Tex. Gov't Code §2306.1711; Tex. Gov't

Field	Detail
	Code §2306.67022; Tex. Gov't Code §2306.6710(a)-(f); Tex. Gov't Code §2306.6711(a)-(i); Tex. Gov't Code §2306.6714; Tex. Gov't Code §2306.6724; 26 U.S.C. §42(m)(1)(B)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 20: [10 TAC §13.11 — Post-Award Requirements](#)

Recommended Changes:

20.1. The regulation prescribes specific proprietary forms throughout (AIA Forms G702, G703, G704, Form HUD-92485). The Department could modernize these references to accept 'or equivalent documentation in a format acceptable to the Department,' which would accommodate digital submission platforms and alternative documentation formats without requiring a rule change every time an industry form is updated.

TDHCA Noted: ok with this

20.2. The detailed developer fee disbursement formula in subsection (c)(14)(G), with its complex first-lien versus non-first-lien distinction and 75%/25% split methodology, could be simplified. The Department could adopt a streamlined disbursement approach that links developer fee payments to construction milestones without the multi-tiered conditional structure, reducing confusion and the need for Department staff to perform complex calculations.

TDHCA Noted: ok with this

20.3. The regulation could benefit from digital modernization. References to emailing contracts in subsection (c)(2) and submission of physical documentation could be updated to reference the Department's Housing Contract System (already mentioned in subsection (c)(14)(F)) as the primary platform for all submissions, creating a single digital workflow rather than a mix of email, system entry, and document submission channels.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4) (general rulemaking); Tex. Gov't Code § 2306.053(b)(10) (administer federal housing programs); Tex. Gov't Code § 2306.111 (administer federal housing funds); Tex. Gov't Code § 2306.201-206 (Housing Trust Fund); Tex. Gov't Code § 2306.203 (rules for Housing Trust Fund administration); Tex. Gov't Code § 2306.185 (long-term affordability and safety of multifamily housing); Tex. Gov't Code § 2306.148 (underwriting standards); Tex. Gov't Code § 2306.150 (property standards); Tex. Gov't Code § 2306.264 (inspections); 24 CFR Part 93 (National Housing Trust Fund); 24 CFR § 93.404 (grantee responsibilities and written agreements); 24 CFR § 93.406 (audits and cost certifications)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 21: [10 TAC §6.2 — Definitions](#)

Recommended Changes:

21.1. Several definitions that merely define universally known acronyms or legal references could be removed without any loss of regulatory clarity. Definitions (5) Code of Federal Regulations, (42) Office of Management and Budget, (60) Supplemental Security Income, (63) Texas Administrative Code, and (66) United States Code are self-explanatory terms that any regulated entity — typically sophisticated nonprofit organizations and local government units — already understands. Removing these five definitions could reduce approximately 120 words of unnecessary text.

TDHCA Noted: ok with this

21.2. Definition (65) Uniform Grant Management Standards (UGMS) applies only to contracts executed before January 1, 2022. Since this date has passed and all current and future contracts

fall under TxGMS (definition 64), the UGMS definition is functionally obsolete. The Department could remove it or add a sunset note, reducing approximately 80 words.

TDHCA Noted: ok with this

21.3. Definitions (64) TxGMS and (65) UGMS could be consolidated into a single definition that references Tex. Gov't Code Chapter 783 and notes the transition date, rather than maintaining two lengthy parallel definitions.

TDHCA Noted: ok with this

21.4. The contract administration cluster — definitions (10) Contract, (11) Contract System, (12) Contract Term, (13) Contracted Funds, (14) Cost Reimbursement, (45) Performance Statement, and (49) Production Schedule — comprises seven definitions totaling approximately 250 words of operational detail that could be incorporated into contract templates or a Department guidance manual rather than codified in rule. This would give the Department flexibility to update these terms as systems and processes evolve without undertaking formal rulemaking.

TDHCA Noted: ok with this

21.5. Definition (24) Emergency still references the 'Food Stamp Act of 1977' rather than the current name 'Supplemental Nutrition Assistance Program' (SNAP) / Food and Nutrition Act of 2008. While the federal LIHEAP statute itself contains older statutory cross-references, the Department could update the terminology in the rule to reflect current program names for clarity.

TDHCA Noted: ok with this

21.6. Definition (43) OMB Circulars could be simplified. It describes the purpose and scope of OMB guidance but the relevant requirements are now consolidated in 2 CFR Part 200. The definition could be shortened to a simple cross-reference.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4); Tex. Gov't Code § 2306.092; Tex. Gov't Code § 2306.097; Tex. Gov't Code § 2306.004; Tex. Gov't Code § 2001.004; 42 U.S.C. § 9901 et seq. (CSBG Act); 42 U.S.C. § 8621 et seq. (LIHEAP); 42 U.S.C. § 6861 et seq. (Energy Conservation in Existing Buildings Act / WAP)
Authority Type	Mixed

Field	Detail
Reduction Category	Streamlining Opportunity; Unnecessary Requirements; Obsolete

Assessment 22: [10 TAC §10.405 — Amendments and Extensions](#)

Recommended Changes:

22.1. The notification content requirements in subsection (b)(4)(A) require a 'phone number' as a contact method. The Department could modernize this to 'phone number or email address' to reflect current communication practices and provide Development Owners flexibility in how they receive inquiries from stakeholders.

TDHCA Noted: ok with this

22.2. The LURA amendment procedures in subsection (b) are lengthy and highly detailed, spanning notification requirements, public hearing procedures, and content requirements across six paragraphs. Many of these procedural details — particularly the public hearing logistics, notification content requirements, and verification deadlines — could be moved to a Department handbook or procedural guide incorporated by reference, keeping only the core substantive requirements (what triggers material vs. non-material status, and what requires Board approval) in rule. This would reduce the regulation's word count substantially while preserving the Department's ability to update procedures more nimbly.

TDHCA Noted: ok with this

22.3. The 24-month participation penalty in subsection (a)(7)(B) could be reconsidered. While the Department has legitimate interest in discouraging gaming of income targeting commitments, a blanket 24-month ban on all persons or entities with any ownership interest — including passive investors who had no role in the amendment decision — is broad. The Department could narrow this to apply only to the Applicant and controlling principals, reducing unintended economic consequences for passive investors and potentially increasing investor willingness to participate in affordable housing developments.

TDHCA Noted: they are already doing this. Will keep this in to make sure rule reflects practice

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.053(b)(4) (general rulemaking); Tex. Gov. Code § 2306.053(b)(10) (administer LIHTC program); Tex. Gov. Code § 2306.6712 (amendment of application subsequent to allocation); Tex. Gov. Code § 2306.6731(b) (reevaluation of developments); Tex. Gov. Code § 2306.6717(a)(4) (public notice of amendments); Tex. Gov. Code § 2306.6708 (application changes or supplements); Tex. Gov. Code § 2306.6710(b)(2) (point deduction for extensions); IRC § 42 (federal Low-Income Housing Tax Credit)
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements

Assessment 23: [10 TAC §10.401 — Housing Tax Credit and Tax Exempt Bond Developments](#)

Recommended Changes:

23.1. The Fair Housing training requirements in subsection (a)(6) could be modernized. The current requirement specifies five hours of in-person training from a Department-approved trainer with a three-year expiration — and applies to controlling principals, property managers, and lead architects/engineers. The Department could consider accepting online or self-paced Fair Housing training from accredited providers (not just Department-approved trainers), which would expand access and reduce scheduling friction. The three-year currency window could be extended to five years to reduce recurring compliance costs while still maintaining knowledge currency.

TDHCA Noted: want to keep in for stakeholder feedback

23.2. The Construction Status Report requirements in subsection (b) could be streamlined by adopting a digital submission portal that pre-populates information from prior submissions and eliminates the need to resubmit unchanged documents each quarter. The requirement that the Development Owner must independently hire a third-party inspector when the lender/investor

does not require inspections (subsection (b)(5)) adds cost without clear incremental benefit — the Department could accept alternative evidence of construction progress (such as lender draw inspection reports or photo documentation with owner certifications) in lieu of a separately hired inspector.

TDHCA Noted: want to keep in for stakeholder feedback

23.3. The TDHCA Compliance Training Certificate currency requirement in subsection (d)(3)(B)(xxxii) — not older than two years — could be extended to three years to align with the Fair Housing training currency window in subsection (a)(6), reducing the frequency of training renewals and associated costs for development owners.

TDHCA Noted: ok with this

23.4. The requirement for a current survey or plat certified by a licensed Texas Registered Professional Land Surveyor at the 10% Test stage (subsection (a)(4)) could be relaxed where no material changes to the site have occurred since application. Allowing a previously submitted survey with an owner's affidavit of no change would reduce surveying costs for development owners.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov't Code § 2306.053(b)(4), (10), (14); Tex. Gov't Code § 2306.6701; Tex. Gov't Code § 2306.6710(b)(2); Tex. Gov't Code § 2306.6713; Tex. Gov't Code § 2306.6719; Tex. Gov't Code § 2306.6724(g); Tex. Gov't Code § 2306.6734; Tex. Gov't Code § 2306.185; Tex. Gov't Code § 2306.148; IRC § 42(h)(1)(E), (h)(6), (m)(2)(C)-(D), (f)(1); 26 CFR § 1.42-6
Authority Type	Mixed
Reduction Category	Unnecessary Requirements; Streamlining Opportunity; Excessive Requirements

Assessment 24: [10 TAC §2.401 — General](#)

Recommended Changes:

24.1. The 30 discretionary referral grounds in subsection (a) could be consolidated and simplified. Many of these grounds (e.g., items 1-3 on cost repayment).

TDHCA Noted: ok with this

24.2. Subsection (h) contains an apparent typographical error ('to discuss resolution of the.' — sentence appears truncated). This could be corrected.

TDHCA Noted: ok with this

Field	Detail
Statutory Authority	Tex. Gov. Code § 2306.0504; Tex. Gov. Code § 2306.053(b)(4); Tex. Gov. Code § 2001.004; Tex. Gov. Code § 2306.0321; Tex. Gov. Code § 2306.041; Tex. Gov. Code § 2306.6719
Authority Type	Mixed
Reduction Category	Streamlining Opportunity; Unnecessary Requirements