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May 14, 2026

Texas Department of Housing and Community Affairs  
211 East 11<sup>th</sup> Street  
Austin, Texas 78701

Re: Public Comment on Proposed Texas Regulatory Efficiency (TREG) Rule  
Recommendations for TDHCA

Dear Ms. Boston,

On behalf of the Texas Affiliation of Affordable Housing Providers (TAAHP) and its members, we respectfully submit the following public comment in response to the Texas Regulatory Efficiency Office (TREG) Review of the Texas Department of Housing and Community Affairs (TDHCA) Qualified Allocation Plan (QAP) and related rules. TAAHP is the statewide trade association representing developers, lenders, investors, attorneys, and other professionals who together produce and preserve the overwhelming majority of affordable rental housing financed through the Low-Income Housing Tax Credit (LIHTC) program in Texas.

The QAP is a robust document that has grown quite substantially over time. While TAAHP is supportive of finding clarity in the language, streamlining the document itself, and finding better ways to rewrite the document to provide clarity/readability, we are not supportive of holistic rewriting that seeks to change the underlying rules or process.

Our public comment addresses the following overarching themes, each of which is developed in greater detail in the attached item-by-item responses to the TREG survey recommendations.

**1. Rule Content Must Remain in the Rule.** Several TREG recommendations propose migrating substantive rule provisions into staff-controlled policy manuals or website guidance. TAAHP strongly objects to this approach. Standards that govern eligibility, scoring, and feasibility determinations in a competitive program must be codified, where they are subject to public notice and comment, legislative oversight, and legal enforceability. Moving rule content into manuals or guidance documents removes these protections and introduces uncertainty that undermines an applicant's ability to make the business decisions necessary to commit the significant resources.

**2. Ambiguity Increases – Not Reduces – Administrative Burden.** Where TREG recommendations replace fixed criteria with "subject to further Department review" or "performance-based standards," the practical effect is to shift dispute resolution from the application stage to the Board of Directors. This does not simplify the program; it relocates complexity in a manner that increases staff burden, extends timelines, and creates inequitable outcomes for applicants who cannot predict how

discretionary standards will be applied in any given year. Specificity is what enables consistent, fair, and efficient administration of a complex competitive program.

**3. TREO Reviewed the QAP Without Full Context.** TAAHP respectfully observes that a number of TREO's recommendations reflect a review conducted without full knowledge of the statutory framework governing the QAP, the operational history behind specific provisions, or the practical realities of the application and underwriting process. Our comment seeks to provide TDHCA and TREO with an industry practitioner's perspective on the process.

**4. Administrative Efficiencies Should Come from Internal Process Improvements, Not Rule Reductions.** TAAHP recognizes that TDHCA staff faces real administrative burdens. However, the burden may be resolved through internal review practices, not the QAP text itself. TAAHP stands ready to partner with TDHCA to identify process improvements that reduce friction without weakening the protective language that applicants and investors rely on. Reducing the QAP's protective provisions in the name of efficiency would impose costs on the development community that far outweigh any administrative savings.

**5. The Foundation Must Be Right – The 2027 QAP Cycle Is Critical.** TAAHP recognizes that this public comment round is one of several inputs into a larger 2027 QAP development process that will also incorporate a contracted structural rewrite and TDHCA's normal annual rulemaking. TDHCA has indicated an intent to release the 2027 draft QAP earlier than usual, which underscores the importance of resolving foundational issues now. TAAHP urges TDHCA to approach this convergence with care: the rewrite process should not become a vehicle for substantive policy changes that have not received full public notice and stakeholder input.

TAAHP appreciates TDHCA's openness to industry feedback throughout this process, and we are encouraged by staff's expressed alignment on several of the core principles outlined above. The detailed item-by-item responses attached to this letter reflect the collective expertise of TAAHP's QAP Committee, whose members bring decades of experience navigating the program as applicants, investors, lenders, and advisors.

We look forward to continued collaboration as the 2027 QAP takes shape and remain committed to a QAP that is both clear and complete.

Sincerely,



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CC: Kathryn Saar, President-Elect  
Bobby Wilkinson, Executive Director, TDHCA  
Brooke Boston, Deputy Executive Director, TDHCA

# TAAHP Comments on the TREO Review

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## **Assessment 2: 10 TAC §10.402(b) – Requests for Subordination Agreements, HUD Amendments, and HUD Riders to Restrictive Covenants**

### **2 – Requests for Subordination Agreements, HUD Amendments, or HUD Riders to Restrictive Covenants**

TAAHP opposes the full repeal of this rule and the relocation of its content to the Post Award Activities Manual. Manual content can be revised at staff discretion without notice, stakeholder input, or board action – which is incompatible with the certainty owners, lenders, and their counsel need to structure transactions that affect long-term affordability obligations.

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## **Assessment 3: Chapter 10 – Affirmative Marketing Requirements**

TAAHP supports this recommendation. Scaling back affirmative marketing obligations to federally required groups – and retaining the requirement for people with disabilities on credit and bond deals – appropriately calibrates the rule to its statutory floor and removes obligations that have extended beyond what federal law requires. Property management operators have long absorbed the compliance cost of marketing requirements that no longer reflect current fair housing enforcement priorities or measurable outcomes for protected classes. Aligning the rule with federal requirements preserves the protections that matter most while eliminating administrative overhead that does not advance the Department's compliance or fair housing goals. TAAHP appreciates the Department's leadership in identifying this provision as ripe for reform and supports moving the draft rule forward in June.

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## **Assessment 4: Chapter 11 – Qualified Allocation Plan**

### **4 – Qualified Allocation Plan / Chapter 11 Rewrite**

TAAHP supports a thoughtful review of Chapter 11 but rejects treating an arbitrary 75,000-word target as a policy goal. The QAP's length reflects 25 years of refinement that gives applicants the certainty to invest approximately \$50,000 in an application and gives the program the administrability to function fairly in a highly competitive process. TAAHP requests that industry and the Department be at the table from start to finish of any rewrite, and that comparison to other state QAPs inform – but not dictate – the scope of revisions. Two cross-cutting concerns thread through many of the recommendations below and should be read alongside each: (1) moving rule content into staff manuals is strongly opposed – it removes stakeholder input, is harder for the Board to enforce, and invites ambiguity and case-by-case argumentation that actually increases administrative burden; and (2) real efficiencies live in TDHCA's internal review processes, not in cutting protective language out of the QAP. If word reduction remains the goal, lower-risk paths include moving the underwriting rules and the third-party report rules into their own documents.

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## **Assessment 8: 10 TAC §11.9 – Competitive HTC Selection Criteria**

### **8.1 – Opportunity Index / Amenity Categories**

TAAHP does not recommend eliminating amenity categories. Reducing the number of amenities reduces the number of sites that qualify for full points – the opposite of what we want to happen. A large selection of amenities is necessary in both growing markets and rural Texas to evaluate a site's attractiveness across diverse locations and community types. Consolidating items like indoor and outdoor recreation also creates fewer total

options to garner maximum opportunity index points, where keeping them separate allows an applicant to select both. Standardizing distances for most amenities could be workable, but certain amenities – universities, for example – need greater distance thresholds and should not be forced into a single tier. The specificity in the current rules has been developed over years in response to actual on-the-ground circumstances and is real-world tested. That said, TAAHP supports improving the organization of the section – for example, by grouping amenities that share the same distance requirement.

## 8.2 – Measurement & Mapping / GIS Distance Calculations

TAAHP does not recommend the proposed change. Boundary-to-boundary measurement has been discussed at length in prior years and was determined to be the best approach for the applicant – it is more work, but it is the most beneficial because it preserves the flexibility to account for individual site nuances. In practice, sites are often carved out of a larger parent tract of land, and applicants sometimes limit site size to avoid undesirable site features. A system using Central Appraisal District boundaries, for example, would not allow for those circumstances. Automated GIS platforms also typically approximate from a single point at the center of a census block or parcel, sacrificing accuracy on larger sites and where parcel data is outdated. The current process is not a significant burden – applicants, not TDHCA staff, produce the maps and measurements, and applicants already use GIS to do so. The process is also self-correcting through the RFAD/challenge process; reviewing maps is an exhibit check, not a measurement exercise.

## 8.3 – Quantifiable Community Participation / QCP

TAAHP does not recommend reducing the QCP point tiers or streamlining the challenge process as proposed. QCP is the 9th of the 10 required statutory scoring items and must include descending point order, so the point structure cannot be changed without changing the broader QAP scoring framework – any change must live within statute. Neighborhood groups and nonprofits – particularly active in Houston and San Antonio – rely on this scoring item to engage with proposed developments, and changes that disrupt those relationships or signal that community partner input has been deprioritized should be avoided. There may be room to consolidate QCP with the nonprofit/community organization scoring item (8.6) into a single, simpler item, but this would require coordination with TDHCA staff and careful attention to statutory constraints.

## 8.4 – Pre-application Participation

TAAHP does not recommend consolidating the eleven consistency requirements. Each requirement exists for a specific reason developed over years in response to real-world circumstances, and together they preserve the statutory purpose of pre-application (TGC 2306.6704) by preventing applicants from materially altering a proposal between pre-app and full application in ways that would manipulate scoring or tie-breakers. An applicant who changes substantive elements is effectively submitting a different application, and competitors lose the ability to judge their applications against each other – the statutory purpose of the scoring item. Without this specificity, there is little value to pre-application as a scoring item, and the broader requirements should remain.

## 8.5 – No-Rounding Policy

TAAHP does not recommend a change here. The current no-rounding policy reflects prior industry discussions and exists for substantive reasons: many scoring items require an applicant to be strictly under (or over) a specific threshold, and any rounding standard would compromise those determinations. The policy also responds to calculation disputes in prior years and to the need for precise calculations in scoring items such as Leveraging and Cost of Development per Square Foot.

## 8.6 – Input from Community Organizations

The TAAHP QAP Committee did not reach consensus on this recommendation. The positions discussed are below.

Position A – Keep (d)(6) as a separate scoring item; do not consolidate. The scoring item serves a real function: applicants default to it when there is no qualifying neighborhood organization. It exists specifically to allow groups like Meals on Wheels to support an application.

Position B – Keep both separate and intact; the recommendation misreads them as the same. QCP input is not functionally the same as local nonprofit support – the requirements differ because the supporting groups differ, and those differences matter. The scoring sections should not be combined.

## 8.7 – Cost of Development per Square Foot

TAAHP does not recommend consolidating the six threshold paths into fewer tiers. The industry has had many conversations on this scoring item, and the current structure already reflects narrowing in recent years. Each path is responsive to fundamental differences between deal types – new construction versus rehabilitation, building cost versus more inclusive cost, and opportunity index-qualifying rehab versus other – because development is not one-size-fits-all. Collapsing these would eliminate options that today allow projects to qualify, resulting in fewer housing choices that can score.

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## Assessment 9: 10 TAC §11.1 – General

### 9.1 – QAP Definitions

TAAHP urges extreme caution on this recommendation. The TAC definitions have been crafted and refined over time to provide the specificity applicants need, and in many cases they translate statutory terms into more accessible language than §2306.6702 or IRC §42 themselves use. The tax credit process is already difficult enough without requiring applicants to keep three sets of rules open to understand basic terms – definitions should remain comprehensive within the QAP itself. If a particular definition can be articulated in fewer words without losing meaning, TAAHP can support that tightening, but word count alone is not the right goal where policy substance is at stake.

### 9.2 – QAP Cross-References

TAAHP is generally open to consolidating cross-references into a clearer applicability statement, with the caveat that some citations do substantive work and removing them could change a rule's meaning. A meaningful cleanup would also require a coordinated relook at the other rules being referenced, so this is best handled as part of a broader rewrite.

### 9.3 – QAP Scoring Methodology Format

TAAHP supports adding a summary scoring table as a reader aid to simplify navigation, provided it sits alongside – not in place of – the underlying scoring language in rule. A table alone cannot stand; applicants will still need the prose to understand what each scoring item requires, which inherently involves cross-referencing (and TAAHP notes this is in some tension with the prior recommendation that discouraged cross-references). Any

presentation change must preserve the statutory scoring priorities under §2306.6710 and §2306.6725 and should not introduce gray areas that cause issues at award.

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## Assessment 10: 10 TAC §11.101 – Site and Development Requirements and Restrictions

### 10.1 – Undesirable Site Features / Distance Buffers

The TAAHP QAP Committee did not reach consensus on this recommendation. The positions discussed are below. Across all positions, the Committee was firm that any replacement language must define what passes, what mitigation is acceptable, and what the applicant must demonstrate – no halfway position that introduces ambiguity (such as "subject to further department review").

Position A – Open to a performance-based standard with mitigation. A standardized reference framework can work, as long as mitigation remains available. The current distances are fairly arbitrary, and the ambiguity in many items drives Board determinations – revising the list is worth doing.

Position B – Open in principle, but want to see the actual proposed changes first. TAAHP does not want vague distances or annually adjusting standards; consistency year over year matters for real estate underwriting. If everything becomes mitigatable, that is acceptable as long as the standard is consistent.

Position C – Eliminate the Undesirable Site Features section entirely. The simplest option is to strike the section and continue requiring all Phase I ESA actions and mitigation. The ESA already covers what matters, and the distance list is redundant.

### 10.2 – Neighborhood Risk Factors / Neighborhood Scout

The TAAHP QAP Committee did not reach consensus on this recommendation, though discussion was leaning toward eliminating the crime test entirely. The positions discussed are below.

Position A – Eliminate the crime test entirely from both the Opportunity Index and the Neighborhood Risk Factors. The current single-source approach carries real cost and limited program value – sites that fail typically proceed to mitigation regardless. No viable substitute has emerged in years of asking, so the cleanest path is to strike the test from both sections rather than keep half of a system that does not function well.

Position B – Allow alternative data sources (FBI, local law enforcement, etc.). Anchoring eligibility to a single commercial website is fragile, and FBI data has been more accurate in prior experience. Applicants should be allowed to submit an alternative source if they have one.

Position C – Keep Neighborhood Scout as the singular source. A universal single source is easier to apply statewide and gives applicants certainty in a competitive program. Previously allowing alternative sources led to Board disputes that turned on who tells the best story.

### 10.3 – Minimum Rehab Cost Thresholds

TAAHP does not recommend indexing the minimum rehabilitation cost thresholds to an inflation measure. The development community needs consistency over time in expected rehabilitation thresholds, and the thresholds were just increased by 17 to 25 percent in the 2026 QAP – further adjustments should not be made for several years. Because the QAP is already updated annually, a singular number can be revisited through that process

when warranted, without adding another CPI-indexed element. A minimum threshold remains essential to prevent superficial "mop-and-glow" rehabilitations.

## 10.4 – Static Technology Assumptions

TAAHP does not see a substantive change as necessary here. The "current technology for data and phone" language is itself the prior update – it replaced earlier rules that prescribed specific wiring types. The word "current" allows the rule to accommodate evolving technologies like VOIP without further rulemaking, and the data requirement already covers VOIP phone service. Any wording refresh could be handled as part of the broader rewrite.

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## Assessment 11: 10 TAC §11.302 – Underwriting Rules and Guidelines

### 11.1 – Underwriting / Fixed Dollar Thresholds

TAAHP does not recommend moving fixed dollar thresholds and percentage parameters into a separate schedule or appendix updatable by NOFA or Board resolution. These thresholds are best kept in rule, where industry has input through rulemaking before changes take effect. Underwriting standards also should not be modified without significant analysis of their effects, and any review of these thresholds would benefit from consultation with industry financing partners about how they interact with private underwriting standards. The underwriting framework should not be restructured for word count alone.

### 11.2 – Underwriting / 5% Tolerance Threshold

TAAHP is generally supportive of stating the 5 percent tolerance standard once and cross-referencing it across the three subsections where it currently appears, provided each instance is reviewed to confirm the meaning does not change. This could be appropriately handled as part of a broader rewrite or update of the underwriting rules.

### 11.3 – Underwriting / Procedural Detail

The TAAHP QAP Committee did not reach consensus on this recommendation. The positions discussed are below.

Position A – Keep underwriting in the TAC; do not move to the Manual. Granular underwriting detail is essential, and applicants need to know exactly what is expected in a program where TDHCA can deem a deal infeasible and eliminate it from award consideration. The TAC is what the Board can enforce; if the section is too lengthy, reword for efficiency, but keep the standards in rule.

Position B – Separate underwriting from the QAP entirely, either into the Multifamily Procedures Manual or into its own standalone rule document. Underwriting is its own body of work and arguably does not belong in the QAP. Pulling it out cleans up the QAP and helps with the word-count target without touching the underlying substance.

### 11.4 – Underwriting / Operating Expense Line Items

TAAHP does not recommend consolidating the twelve operating expense categories. The prescriptive detail is intentional and serves as valuable guidance to the industry – it provides consistency and lets applicants know specifically how the Department will treat expenses, which streamlines the application process. TAAHP would support rewording for word count in-rule, but the line-item taxonomy should remain."

## 11.5 – Underwriting / Feasibility Conclusion / Capture Rate

TAAHP is generally open to presenting capture rate thresholds in table format, contingent on review of the proposed tables to confirm the substantive standards are preserved unchanged.

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## Assessment 12: 10 TAC §11.204 – Required Documentation for Application Submission

### 12.1 – Required Documentation / Rural-Urban Designation

TAAHP does not recommend a self-certification process for Rural/Urban Designations. In a competitive process, other applicants need transparent notice when a designation is changing from its default. It may help, however, to clarify in rule that this process is intended only for a limited set of situations: Rural/Urban designations are all but automatic, and the six-factor analysis exists for one-off scenarios where the automatic designation does not match the true character of the place.

### 12.2 – Required Documentation / Cost Documentation

On the \$20,000 per-unit CPA threshold, the Committee is aligned: TAAHP supports increasing the \$20,000 cost threshold for CPA letters on site work costs included in Eligible Basis. This piece of the recommendation is not contested. On the utility allowance documentation, TAAHP did not reach consensus, and one position suggests TREO may have misread the status quo. The positions discussed are below.

Position A – Status quo misread; UA documentation is already submitted electronically. It is unclear what TREO is proposing to change, and TAAHP recommends the Department verify the current process before this piece of the recommendation moves forward.

Position B – Get utility providers' input before commenting. The UA piece needs more comment, including input from utility providers, before TAAHP takes a position.

Position C – The current UA submission methodology is not burdensome; replacing it with another, likely more complex methodology would not be an improvement for applicants.

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## Assessment 13: 10 TAC §10.614 – Utility Allowances

### 13.1 – Utility Allowances / Worked Examples

TAAHP does not recommend moving the worked utility allowance examples into a companion guidance document or FAQ. The examples are tied to compliance determinations, so they are best kept in rule where stakeholders have input through rulemaking. FAQs are a useful tool for explaining how rules apply, but they are not the right vehicle for content that drives compliance outcomes. If the examples are repetitive, TAAHP would support tightening or consolidating them in-rule.

### 13.2 – Utility Allowances / Actual Use Method

TAAHP does not recommend moving the Actual Use Method procedural specifications to submission instructions on the Department's website. A website-maintained instruction document would require ongoing maintenance and could create gray areas between what is on the website and what the rule requires, generating challenges over which standard controls. If the section is too prescriptive, TAAHP would support tightening it in-rule.

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## Assessment 14: 10 TAC §8.6 – 811 Project Rental Assistance Program

### 14.2 – 811 PRA Program / Iterative Correction Processes (EIV, House Rules)

Given that compliance failures in the 811 PRA program can affect residents' housing assistance, the underlying standards belong in rule rather than in self-certification templates that can be revised without notice or stakeholder review.

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## Assessment 15: 10 TAC §11.201 – Procedural Requirements for Application Submission

### 15.2 – Procedural Application / Fee-Error Cure Period

TAAHP opposes any change that would reduce the existing five-business-day deficiency cure period with its extension provision down to a three-business-day period without extensions. Deficiencies that require third-party documentation often cannot be cured in five business days, much less three, and removing the extension provision would generate avoidable disqualifications that do not serve the program's purpose.

### 15.3 – Procedural Application / Neighborhood Opposition Challenges

TAAHP opposes streamlining or replacing the fact-finder process for challenges to neighborhood organization opposition. While the procedure may appear elaborate for a narrow question, neighborhoods have a legitimate right to voice their opinions on developments in their communities, and the existing process gives neighborhood organizations a clear, structured channel to be heard. TAAHP recommends leaving the current procedure intact.

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## Assessment 16: 10 TAC §10.407 – Right of First Refusal

### 16.1 – Right of First Refusal / Notification Letters

TAAHP does not recommend replacing the seven content requirements for ROFR notification letters with a Department-approved template. The notification content determines whether the statutory ROFR process has been validly triggered, so the requirements are best kept in rule.

### 16.3 – Right of First Refusal / Satisfaction Frameworks

TAAHP is agreeable to consolidating these frameworks, provided industry has input into the satisfaction criteria during drafting.

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## Assessment 17: 10 TAC §11.303 – Market Analysis Rules and Guidelines

### 17.1 – Market Analysis / Report Content Checklist

TAAHP opposes consolidating the 13-item checklist into a Department-published template “maintained outside the TAC.” Content located outside the TAC cannot be enforced with the same authority, and the checklist is in the TAC for a reason: it provides applicants the consistency and predictability they need in a competitive scoring process. The TREO recommendation explicitly frames the benefit as updating formatting expectations “without

rulemaking,” which is precisely the mechanism that removes stakeholder input from a competitive scoring process. TAAHP supports tightening genuinely duplicative items in-rule, but the substantive content requirements must remain in the TAC.

### **17.2 – Market Analysis / PMA Narrative Items**

TAAHP’s position is contingent on direct input from approved Market Analysts on how the change would affect their workflow and analytical product. The Department should solicit Market Analyst feedback before finalizing any consolidation.

### **17.3 – Market Analysis / Qualification Submission List**

TAAHP is not in the best position to assess the operational details and defers to approved Market Analysts; the Department should solicit their input directly before finalizing changes.

### **17.4 – Market Analysis / Comparable Development Data**

TAAHP defers to approved Market Analysts on whether consolidating the twelve-item comparable development data sheet under a single “development characteristics relevant to comparability” standard would preserve the analytical rigor the program requires. The Department should solicit Market Analyst input directly before finalizing this change.

### **17.5 – Market Analysis / HTC Property Inventory Date**

TAAHP supports replacing the hard-coded December 31, 2024 reference with a dynamic reference to the HTC Property Inventory published as of December 31 of the year preceding the Application Acceptance Period. This is a low-cost change that eliminates the need for annual rule amendments to update the date.

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## **Assessment 19: 10 TAC §11.6 – Competitive HTC Allocation Process**

### **19.1 – Competitive HTC Allocation / Year-Neutral Reference**

TAAHP supports replacing the hard-coded reference to the “2024 State of Texas Competitive Housing Tax Credit Ceiling Accounting Summary” with a year-neutral reference such as “the current program year.” This citation has been missed in the last two QAPs, and a year-neutral reference would prevent recurrence.

### **19.2 – Competitive HTC Allocation / Force Majeure and Short-Term Delay**

TAAHP supports consolidating the Force Majeure and Unforeseen Short-term Delay provisions into a single, more concise credit-return framework with tiered criteria, provided the substantive policy are unchanged in the consolidated language.

### **19.3 – Competitive HTC Allocation / Supportive Housing Caps**

TAAHP supports consolidating the Supportive Housing Target Population caps into a single population-threshold provision, as the consolidation reduces word count without changing the substantive rule.

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## **Assessment 22: 10 TAC §10.405 – Amendments and Extensions**

### **22.2 – Asset Management Amendments / LURA Amendment Procedures**

TAAHP opposes relocating LURA amendment procedural detail – public hearing logistics, notification content requirements, and verification deadlines – to a Department handbook incorporated by reference. LURA amendments govern long-term affordability obligations that span decades, and owners, lenders, and investors structure transactions in reliance on these procedures being set in rule and updated through rulemaking, which ensures stakeholder input and predictability. If the section is too lengthy, TAAHP would support reducing or rewording the requirements in-rule to address word count; the procedures themselves are best kept in the TAC.

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## **Assessment 23: 10 TAC §10.401 – Housing Tax Credit and Tax Exempt Bond Developments**

### **23.1 – Asset Management / Fair Housing Training**

TAAHP supports extending the Fair Housing training currency window from three years to five years.

### **23.2 – Asset Management / Construction Status Report**

TAAHP supports streamlining this process. A digital submission portal that pre-populates prior information so owners submit only what's new each quarter would be a meaningful improvement. On the inspection requirement: lenders typically require monthly site inspections by internal staff or outside consultants during construction, performed in conjunction with the lender's receipt of lien waivers to fund monthly draws and maintain the construction budget. Where the lender's inspection is already covered in the approved budget, TAAHP agrees the separately hired third-party inspector adds duplicative cost and should be eliminated.

### **23.3 – Asset Management / Compliance Training Currency**

TAAHP supports extending the TDHCA Compliance Training Certificate currency requirement from two years to three years to align with the Fair Housing training currency window. This change reduces the frequency of training renewals and associated costs for owners without compromising compliance knowledge.