# Housing New Mexico MFA

LIHTC Fundamentals Workshop

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#### **LIHTC Fundamentals**

- Overview of Development Process & Low-Income Housing Tax Credit Program
  - 2 Understanding 4% and 9% Credits
    - Basis and Credit Calculation
      - 4 Financing a Sample Project
        - **5** Qualified Allocation Plan (QAP)
          - Evaluating Projects, Subsequent Awards, and Compliance
            - Questions



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#### **Development Process**





- ➤ Internal Revenue Service program created by Tax Reform Act of 1986 to provide alternative funding for low- and moderate-income households
- Program is administered by the US Treasury Department
- ➤ Credits are allocated by a designated Housing Credit Agency through a Qualified Allocation Plan (QAP)
- > Credit is a dollar-for-dollar tax reduction for 10 years
- Credit amount is based on the cost of acquiring, constructing or rehabilitating housing developments
- ➤ Investors purchase credits to offset federal tax liability
- > Equity from the sale of credits reduces debt, resulting in lower rents



- ➤ In New Mexico, LIHTC Program is administered by New Mexico Mortgage Finance Agency (Housing New Mexico/MFA)
- ➤ Both 9% and 4% credits available
- ➤ 4% credits are "as of right" with the use of tax-exempt bonds
- > 9% credits are competitive
- For 9% LIHTC, states receive a finite allocation of tax credits each year, allocated on a per capita basis (approx. \$6.1M per year in NM)



- Calculated based on the production of rental units serving residents earning no more than 80% of area median income (AMI), with a focus on those earning no more than 60% of AMI
- Projects must continue to serve low-income residents for a minimum of 30 years
- Investors also derive tax benefits from losses
- Credits may be recaptured by the IRS if the project does not comply in the first 15 years (Compliance Period)









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Investors Equity

Credits







Housing Credit Allocating Agency





Low-Income Rental Development





Limited Partnership





#### Low-Income Housing Tax Credit Process





### Affordable vs Market Rate Development

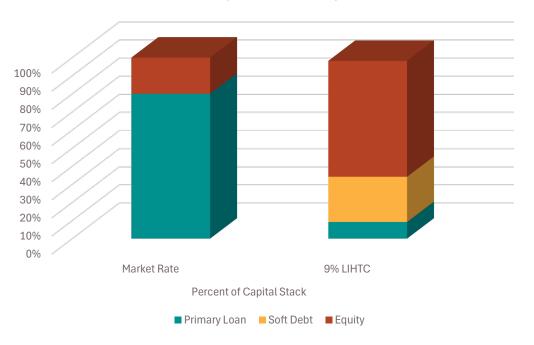
Affordable	Market Rate
Similar Hard Costs	Similar Hard Construction Costs (some additional flexibility in construction scope)
More soft costs due to regulatory and compliance requirements: Developer Fee Legal and Accounting Fees Certain Financing Costs Reserve Requirements	No Upfront Developer Fee Legal and Accounting Fees only as required by lenders No LIHTC Fees Reserves limited to lender requirements
Restricted Rents limit cash flow	Unrestricted rents generate cash flow as rents increase
Long-term affordability restricts upside at disposition	Property appreciation generates gain at disposition of property



### Affordable vs Market Rate Development

# Less debt allows the Owner to charge lower rents to tenants.

#### Total Development Costs by Source



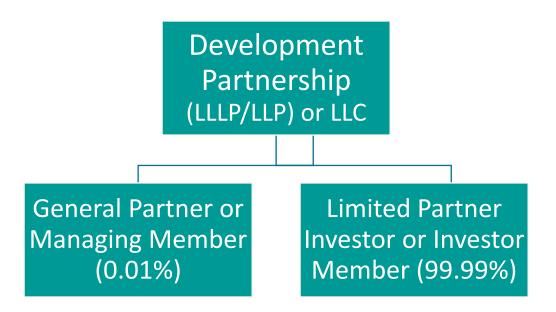




#### **Limited Partnership Structure**

# Partnership Structure to Receive LIHTC

- General partner controls and operates the project, provides guarantees
- Passive limited partner invests equity in return for 99.99% ownership
- Limited partner gets its return almost exclusively from the tax credits and tax losses from the project
- Equity from the sale of credits reduces need for debt & other financing needs of the project, allowing for lower rents





#### **Team Members**

#### **Development Team:**

- Developer
- General Contractor
- Architect
- Attorney
- Accountant
- Property Manager
- Consultant(s)

#### Lenders:

- Construction lender
- Permanent Lender
- Lender Attorneys

#### **Syndicator:**

- Underwriter
- Fund Manager
- Attorney
- Attorney

#### State HFA

- Housing Development
- Asset Management





#### **Investor Risks and Benefits**

- ➤ Market Risk: ability to effectively assess market for development and remain competitive in the market throughout the affordability period.
- ➤ Construction and lease-up risk: units must be completed and rented to specified residents to claim Credits.
- > Tax risk: recapture of Credits taken in prior tax years and ability to claim future Credits due to project noncompliance.
- > Tax benefits: 10-year stream of tax credits + depreciation and losses.
- > Social benefits: social responsibility
- > Other benefits: portfolio diversification



### **Development Requirements**

- ➤ Minimum percentage of LIHTC units (20/50, 40/60, or Average Income).
- Maximum rents limited for LIHTC units.
- Minimum 30-year affordability commitment per Code
- > Credits cannot exceed amount necessary for financial feasibility
- Developments must satisfy state QAP
- Market study required
- Projects subject to IRS and state regulation oversight



### **Affordability Commitment**

- ➤ 30-year Affordability Commitment per Code
  - ➤ 15-year Compliance Period
  - ➤ At least 15-year Extended Use Period
- Land Use Restriction Agreement (LURA) extended use agreement
- Early termination of 30-year affordability commitment:
  - > Foreclosure
  - Qualified Contract (not an option in NM)



#### **Income and Rent Restrictions**

- Minimum Set-Aside election of:
  - > 20% of units at 50% of area median gross income (AGMI or AMI), or
  - 40% of units at 60% of AMI
  - Average of the low-income units at or below 60%, but units can serve up to 80%
- Must meet minimum set aside by end of first Credit year.
- ➤ Gross rent cannot exceed 30% of qualifying income for an assumed family size (based on number of bedrooms).
- Income/rent limits change annually; HUD publishes income and rent limits (posted on MFA website).
- Gross rent must include an allowance for tenant paid utilities.
- Gross rent does not include Section 8 or similar subsidy.



#### **Income and Rent Restrictions**

- > Assumed family size of 3 persons per bedroom
- > 2-Bedroom Unit (2 bedrooms x 1.5 persons per bedroom = 3 people)

Albuquerque MSA (Bernalillo, Sandoval, Torrance and Valencia Counties)									
For all Placed in Service Properties									
Median Income \$86,400									
	# in Hshld	1	2	3	4	5	6	7	8
	20%	12,100	13,840	15,560	17,280	18,680	20,060	21,440	22,820
	30%	18,150	20,760	23,340	25,920	28,020	30,090	32,160	34,230
	40%	24,200	27,680	31,120	34,560	37,360	40,120	42,880	45,640
	50%	30,250	34,600	38.900	43,200	46,700	50,150	53,600	57,050
	60%	36,300	41,520	46,680	51,840	56,040	60,180	64,320	68,460
FY2024	70%	42,350	48,440	54,460	60,480	65,380	70,210	75,040	79,870
Income	80%	48,400	55,360	62,240	69,120	74,720	80,240	85,760	91,280
Limits &	Maximum Gross Rents by Redroom Size								
Rents		0	1	2	3	4	5		
rtonto	20%	302	324	389	449	501	553		
	30%	453	486	583	674	752	829		
	40%	605	648	778	899	1,003	1,106		
	50%	756	810	972	1,123	1,253	1,383		
	60%	907	972	1,167	1,348	1,504	1,659		
	70%	1,058	1,134	1,361	1,573	1,755	1,936		
	80%	1,210	1,297	1,556	1,798	2,006	2,213		

AMI = \$86,400 (2024, ABQ)

3-person income limit = \$43,680

30% of income limit = \$14,004

Monthly gross rent (1/12) = \$1,167

https://housingnm.org/property-owners-agents-and-managers/tools-resources-1/rent-and-income-limits



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#### 9% Credits:

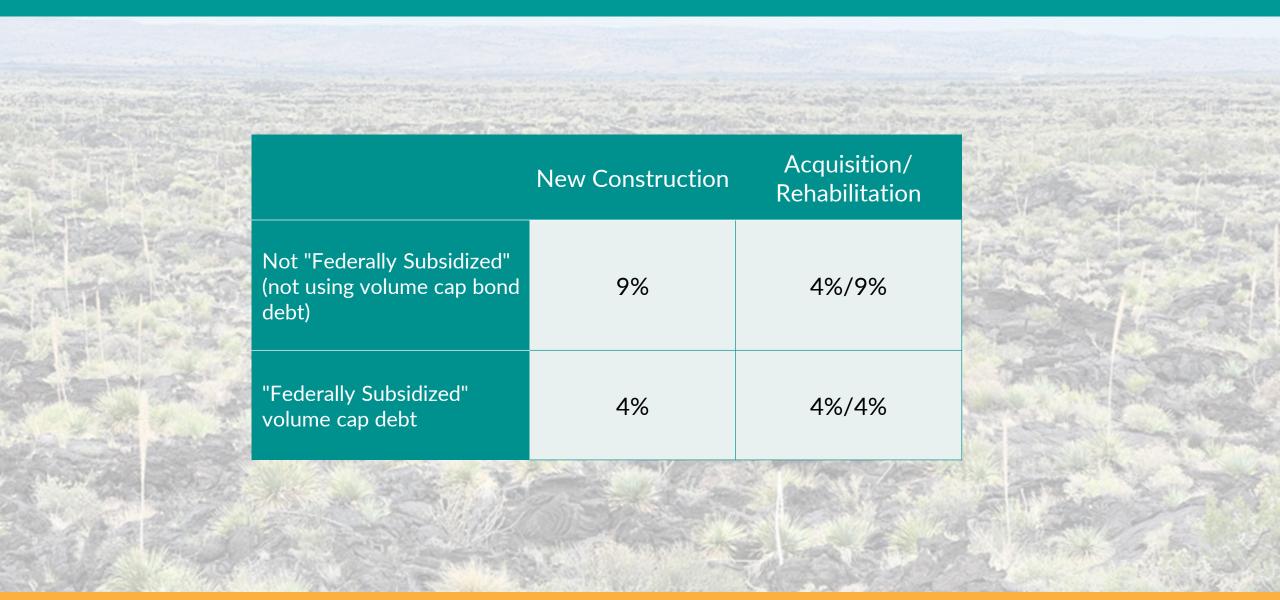
- >~ 70% present value
- Subject to MFA's Credit ceiling and competitive tax credit "round"
- Used for new construction and substantial rehab if building is not "federally subsidized" (which means financed by tax-exempt bonds)
- > Credit rate is "not less than 9%" per PATH Act of 2015



#### 4% Credits:

- >~30% present value
- > Applies to acquisition costs of a building
- "As of right" for new construction or rehab projects using tax exempt bond financing
- Subject to award of private activity bond volume cap from NM State Board of Finance
- Credit rate is not less than 4% per the Consolidated Appropriations Act, 2021







### **Tax-Exempt Bonds and 4% Credits**

- Projects financed (whether new construction or rehab) with volume cap bonds are eligible for 4% credits only.
- Not subject to MFA's competitive tax credit "round" but still must follow QAP and application requirements.
- Rolling applications. Preference for project readiness when volume cap constrained.
- Not subject to carryover allocation and 10% test requirements.
- > 50% test: bond amount must exceed 50% of depreciable basis plus land.



#### Tax-Exempt Bonds and 4% Credits

- Bond deals are subject to additional rules regarding the taxexempt status of the bonds:
- > Requires allocation of State private activity bond volume cap.
- Public hearing or "TEFRA" requirement- must conduct a public hearing and provide notice by publishing 7 days prior to the hearing.
- > Inducement Resolution and Bond Resolution
- Costs of issuance limitation
- Good costs vs. bad costs



#### **4% Acquisition Credits**

- The 4% acquisition credit is used when an owner purchases an existing building that qualifies as a substantial rehab and satisfies the 10-year rule (if applicable).
- "Basis boost" is not available for acquisition credits (more on boost later)
- Computing acquisition basis cost of building including acquisition-related costs
- ➤ If not 100% low income, only low-income percentage of cost can qualify



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### Low-Income Housing Tax Credits Eligible Basis

Costs Excluded from Eligible Basis	Eligible Basis Costs	
Land	Construction costs (on-site)	
Off-site work	Construction related professional fees	
Permanent loan costs	Construction period financing fees	
Insurance and property tax expenses incurred following construction completion	Developer fees	
Application fees	Bond Issuance Fees	2.2
Origination/discount points	Relocation Costs (associated with construction)	
Title fees		
Legal fees		
Reserves		
Syndication fees		
Federal grants		
Post-construction working capital		



30% increase ("boost") to eligible basis for new construction and rehabilitation costs only (acquisition costs not eligible).

Not "Federally Subsidized" (not using volume cap bond debt)

"Federally Subsidized" volume cap debt

HUD designated QCT, DDA, SDDA OR

those that serve a target population and have a need for financial feasibility (NM state-designated basis boost)

**HUD** designated QCT, DDA or SADDA



#### **Qualified Basis**

Qualified Basis: Adjusted Eligible Basis for non-income qualified resident using "Applicable Fraction", which is the lesser of:

- The number of qualifying rent-paying residential units over the total number of rent-paying residential units, OR
- The square footage of qualifying rent-paying residential units over the total square footage of rent-paying residential units



### **Credit Proceeds - New Construction Example**



Credit Proceeds Calculation			
Eligible Basis	\$	10,000,000	
Exclusions*			
Eligible Basis	\$	10,000,000	
QCT/DDA Boost		130%	
Adjusted Basis	\$	13,000,000	
Applicable Fraction		100%	
Qualified Basis	\$	13,000,000	
Applicable Percentage		9%	
Annual Credit	\$	1,170,000	
x 10 years	\$	11,700,000	
Investor Portion		99.99%	
	\$	11,698,830	
Price per Credit	\$	0.88	
Credit Proceeds	\$	10,294,970	





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### Credit Proceeds - Acquisition/Rehabilitation Example

Acquisition Credits by Basis			
\$	2,000,000		
\$	2,000,000		
	100%		
\$	2,000,000		
	100%		
\$	2,000,000		
	4%		
\$	80,000		
\$	800,000		
	99.99%		
\$	799,920		
\$	0.88		
\$	703,930		
	\$ \$ \$ \$ \$ \$		

Rehabilitation Credits by Basis			
Eligible Basis	\$ 10,000,000		
Exclusions*			
Eligible Basis	\$ 10,000,000		
QCT/DDA Boost	130%		
Adjusted Basis	\$ 13,000,000		
Applicable Fraction	100%		
Qualified Basis	\$ 13,000,000		
Applicable Percentage	9%		
Annual Credit	\$ 1,170,000		
x 10 years	\$ 11,700,000		
Investor Portion	99.99%		
	\$ 11,698,830		
Price per Credit	\$ 0.88		
Credit Proceeds	\$ 10,294,970		

Combined Annual Credit (Award): \$1,250,000 Combined Credit Proceeds (Equity): \$10,998,900



## Maximum Supportable Debt

100-Unit Project	
Gross Potential Income	\$ 900,000
Less: Vacancy (7%)	\$ (63,000)
Effective Gross Income	\$ 837,000
Less: Expenses per unit per annum (PUPA)	\$ (470,000)
Less: Replacement Reserves (PUPA)	\$ (30,000)
Net Operating Income	\$ 337,000
Divide by Required Debt Coverage Ratio (1.20)	\$ 280,833
Divide by Debt Constant (0.07657744; 6.5% interest, 30-year amortization)	\$ 3,667,312



### **Financing Gap Estimation**





### **Financing Gap Sources**

#### **Government Sources:**

- Soft Mortgage Debt
- > HOME
- > CDBG
- National Housing Trust Fund
- City or County land
- > Impact/Permit Fee Waivers
- Property Tax Abatement
- > Infrastructure Contribution

#### **Private Sources:**

- ➤ Better 1<sup>st</sup> mortgage terms
- FHLB Affordable Housing Program

#### **Project/Developer Sources:**

- Deferred Developer Fee
- Reduce Acquisition Cost
- General Partner Loan or Equity



### Housing New Mexico Financing Sources

#### Housing New Mexico offers:

- HOME Investment Partnerships (federal)
- National Housing Trust Fund (federal)
- New Mexico Housing Trust Fund
- Primero Investment Fund
- Ventana Fund
- Land Title Trust Fund
- 538 Guaranteed Rural Rental Housing Program
- 542(c) FHA-Insured Multifamily (Risk Share)
- Tax-Exempt Bond Issuances
- State Tax Credit (Donation based)

Universal Rental Development Application for most sources; apply for all Housing New Mexico financing concurrently





# Capital Stack Example

Financing Sources	Amount
First Mortgage – XYZ Bank	\$ 3,667,312
Second Mortgage – HOME Loan	\$ 800,000
Third Mortgage – National HTF Loan	\$ 400,000
Fourth Mortgage – New Mexico HTF Loan	\$ 700,000
Tax Credit Equity	\$10,998,900
Deferred Developer Fee	\$ 33,788
TOTAL:	\$16,660,000



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## **Qualified Allocation Plan Development**

- One-year cycle
- > Gather input and notes all year, hold focus groups
- Start in earnest once awards announced (May)
- Internal approval, then published draft and public
   comment period (August September)
- Board approval, final draft published (October)
- Sent to Governor for final approval (November)



## **Qualified Allocation Plan**

- Code sets forth minimum criteria and grants the HCA broad discretion beyond that. The QAP is to reflect the HCA's housing priorities.
- Section 42(m) Housing Credit Agencies (HCA) must make tax credit allocations pursuant to a QAP that
  - Defines Project Selection Criteria;
  - Gives preference to Projects serving the neediest tenants, for the longest time period, in a QCT that contributes to a concerted community revitalization plan; and
  - Defines procedures for compliance monitoring.



## **Qualified Allocation Plan**

Section 42(m) of the Code also sets forth minimum criteria for inclusion in QAP:

- project location
- housing needs characteristics
- project characteristics, including whether the project includes the use of existing housing as part of a community revitalization plan
- sponsor characteristics
- tenant populations with special housing needs
- public housing waiting lists
- tenant populations of individuals with children
- projects intended for eventual tenant ownership
- the energy efficiency of the project
- the historic nature of the project



## **Qualified Allocation Plan**

Projects choose one of three minimum set-asides:

- At least 20% of units set-aside for households at or below 50% area median income (AMI)
- ➤ At least 40% of units set-aside for households at or below 60% AMI
- Average Income can serve households up to 80% AMI as long as at least 40% of total units are rent and income restricted, and the average income for all tax credit units in the project is at or below 60% AMI



## Housing New Mexico Housing Priorities

- 1. Levels of affordability in excess of the minimum requirements, through one or more of the following:
  - a) Higher numbers of set-aside units; and/or
  - b) Rents set to serve lower income tenants, for example, tenants earning no more than income; and/or
  - c) Extended Use Periods longer than the 30-year minimum.
- 2. Provision of affordable housing to households on public housing waiting lists;
- 3. Maximizing leverage by obtaining other public or private non-equity program resources;
- 4. An equitable distribution of tax credits throughout all parts of the state where affordable housing is needed;
- 5. Provision of housing to serve documented Senior Households, Permanent Supportive units; and Tribal communities;
- 6. Nonprofit development;
- 7. Production of housing with high quality design and construction;
- 8. Production of projects that are located in QCTs and which projects contribute to the development of a Concerted Community Revitalization Plan;
- 9. Provision of housing that is energy efficient; and
- 10. Efficient use of scarce resources including tax credits, measured through lower development costs or other means.



## NM QAP Allocation Set-Asides

- ➤ A certain percentage of the annual credit ceiling setaside for the following:
- ➤ 10% for qualified nonprofits as defined in the IRS Code (if not enough projects under this set-aside, cannot allocate to other projects)
- 20% for Underserved Populations: Permanent
   Supportive Housing and/or projects located within Tribal
   Trust Lands boundaries (if not enough eligible projects,
   can allocate to other projects)



## **NM QAP Scoring Criteria**

The board approved 2025 NM QAP had a total of 126 points available, with a minimum required score of 53.

There are 21 scoring criteria reflecting MFA's Housing Priorities:

- 1. Local Non-profit
- 2. Locational Efficiency
- 3. Rehabilitation Projects
- 4. Sustaining Affordability
- 5. Income Levels of Tenants
- Market Rate Units
- 7. Extended Use Period
- 8. Special Needs Households
- 9. Senior Households
- 10. Households with Children
- 11. Leveraging Resources
- 12. Public Housing Authority Waitlist

- 13. QCT/ Community Revitalization Plan
- 14. Eventual Tenant Ownership
- 15. Historical Significance
- 16. Blighted Buildings/Brownfields
- 17. Efficient Use of Tax Credits
- 18. Non-Smoking Properties
- 19. Adaptive Reuse Projects
- 20. Underserved Populations
- 21. Other Scoring Points



## **Mandatory Design Standards**

- Separate sections for new construction, rehab and special projects (i.e., single room occupancy and adaptive reuse).
- Sub-sections on general design, site design and development, building design and construction, unit design.
- Updated yearly and posted on Housing NM's website.
- ➤ Housing New Mexico:
  - Reviews and approves plans, and
  - Inspects the Project for compliance



## **Application Process**

- 9% Credits: one competitive "round" per year; applications due no later than 1/22/2025 at noon.
- 4% Credits: rolling applications
  - Intent to Submit 30 days prior
- Application Attachments Checklist (not intended to be an exhaustive list).
- Use latest MFA schedules
- Refer to FAQ's
- All documents are posted on MFA's website:

https://housingnm.org/developers/lihtc/current-and-prior-tax-credit-rounds



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## **Financial Feasibility**

- Credit cannot exceed amount MFA determines is necessary for financial feasibility and long-term viability as lowincome housing.
- MFA must consider:
  - All sources and uses of funds;
  - > Equity from Credits; and
  - Reasonableness of development and operating costs.
- > Evaluation occurs three times (application, carryover allocation, completion/8609's).
- Underwriting supplement updated and posted- there are limits on developer and builder fees, operating expense projections, reserve requirements





## Threshold Items for Application

- Site control
  - legally enforceable purchase contract or purchase option, or
  - written governmental commitment to transfer or convey the property to applicant by deed or lease ("transfer commitment"), or
  - Recorded deed or recorded lease
- Zoning
- Fees
- Market Study
- Applicant eligibility
- Financial Feasibility
- Pre-Application Requirements (Intent/QAP Training)





## Scoring

- ➤ The board approved 2025 NM QAP has a total of 126 points available, with a minimum required score of 53 (4% applications are not scored but have minimum requirements)
- Applicant self-scores
- MFA scores
- Deficiency correction process
- Highly competitive tie breaker process
- > Two tracks (new construction and rehab)





## **Award Process**

- Applications due in January
- Each application is reviewed by multiple staff members from both the Asset Management and Housing Development departments for both completeness and scoring
- The Tax Credit Program Manager and Analyst review each application for financial feasibility and threshold requirements (site control, zoning, fees paid, compliance etc.)





## **Award Process (continued)**

- ➤ The Policy Committee reviews staff work and following their approval deficiency corrections and supplemental information requests are sent out
- Staff make site visits to all top scoring projects
- Process and proposed awards are presented to the Allocation Review Committee (ARC)
- Preliminary Award letters are sent out (March)
- ARC presents recommendations to the Board for approval (May)
- Final Reservation Award letters are issued





## **Subsequent Requirements**

- Project must place-in-service or receive a carryover award by the end of the allocation year
- Requirements for carryover include:
  - > Full financing commitments
  - Full zoning (if land had no zoning/agricultural at application)
- ➤ 10% Test MFA deadline August 31st the following year
  - Project must prove that they have spent 10% of eligible basis costs
- > Two years following carryover
  - Project must place-in-service
  - LURA issued, memorializing the requirements agreed upon in the application.
- ➤ IRS Form 8609 allows Project Owner entity to claim tax credits.





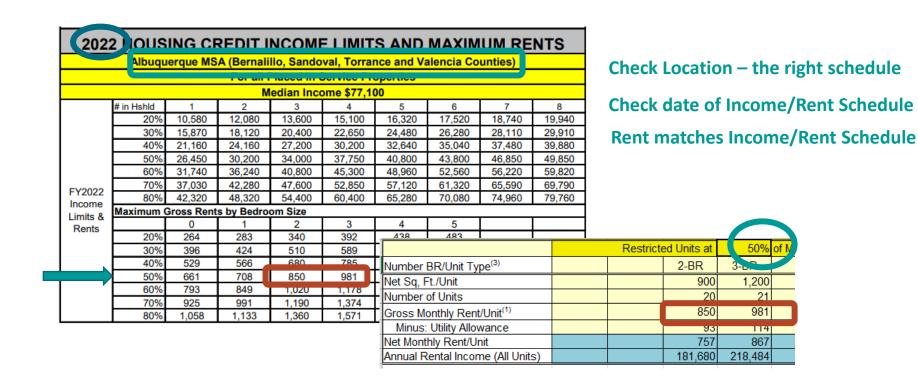
# Compliance

- Compliance period, extended use period
- ➤ Lots of recordkeeping requirements
- Compliance handled by MFA Asset Management department
- Basic rules of compliance:
  - Don't rent LIHTC units to over-income tenants
  - Don't charge low-income families too much rent
  - Don't allow the property to fall into disrepair
  - Comply with your LURA





## **Rent Limits**





## Rent Limits - HAP Contract

### Rent Schedule Low Rent Housing

U.S. Department of Housing and Urban Development Office of Housing

Federal Housing Commissioner

See page 3 for Instructions, Public Burden Statement and Privacy Act requirements.

OMB Approval No. 2502-0012 (exp. 11/30/2020)

Project Name	FHA Project Number	Date Rents Will Be Effective (mm/dd/yyyy)
	N/A	10/01/2022

#### Part A – Apartment Rents

Show the actual rents you intend to charge, even if the total of these rents is less than the Maximum Allowable Monthly Rent Potential.

Col. 1 Unit Type		Contract Rents		Col. 5 Utility		Market Rents (Sec. 236 Projects Only)	
(Include Non-revenue Producing Units)	Col. 2 Number of Units	Col. 3 Rent Per Unit	Col. 4 Monthly Contract Rent Potential (Col. 2 x Col. 3)	Allowances (Effective Date (mm/dd/yyyy)	Col. 6 Gross Rent (Col. 3 + Col. 5)	Col. 7 Rent Per Unit	Col. 8 Monthly Market Rent Potential (Col. 2 x Col. 7)
1 BR	16	835	13.360		835		0
2 BR	8	1,025	8.200		1.025		0
3 BR	36	1,133	40.788		1,133		0
4 BR	15	1,274	19,110		1,274		0

Insert Rents and UA from HAP Contract Into Schedule B

No rent overhang on Schedule C

	Restricte	ed Units at	50% of Median		ncome
Number BR/Unit Type <sup>(3)</sup>	1-BR RA	2-BR RA	3-BR RA	4-BR RA	
Net Sq, Ft./Unit	650	900	1,200	1,400	
Number of Units	16	8	36	15	
Gross Monthly Rent/Unit <sup>(1)</sup>	835	1,025	1,133	1,274	
Minus: Utility Allowance					
Net Monthly Rent/Unit	835	1,025	1,133	1,274	
Annual Rental Income (All Units)	160,320	98,400	489,456	229,320	



# Rent Limits - HAP Contract

How much is my utility allowance for a 1-bedroom unit with:

- Electric Heat
- > Air conditioning
- Natural Gas Stove
- Natural Gas Hot Water Heater

		E	FFECTIVE D	DATE: 1/1/20	22		
	Albuquer	que Housing				ances for	
			urnished Utili				
Mu	ılti-Family (H	igh-Rise/Apa	rtment/Row I	House/ Townh	nouse/Semi-D	etached /Dup	lex)
		0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Heating	•						
	Nat Gas	18	21	23	27	30	33
	Electric	14	17	22	28	33	39
	Botl Gas	67	83	90	102	114	130
	Elec Pmp	13	15	17	20	22	24
Air Cond.							
	Electric	6	7	9	12	15	17
Cooking							
Cooking	Nat Gas	2	3	4	6	7	9
	Electric	5		8	10	12	15
	Botl Gas	8	12	16	20	28	35
	Bott Gas	0	12	10	20	20	33
Other Elec/I							
	Electric	17	20	27	35	43	51
Water Heate	or .						
water freate	Nat Gas	6	7	10	13	16	19
	Electric	11	13	16	20	24	27
	Botl Gas	20	28	39	51	59	75
	Don Gas	20	26	37	31	37	13
Water							
***	Water	26	28	33	37	41	46
Sewer							
	Sewer	19	21	24	28	31	35
Trash Collec	rtion						
Trasii Collec	Trash	18	18	18	18	18	18
	114311	10	10	10	10	10	10
Range	L	11	11	11	11	11	11
Refrigerator		12	12	12	12	12	12
System Char							
System Chai	Gas	13	13	13	13	13	13
	Electric	8	13	13	13	1.5	13





## **LIHTC Fundamentals**

- Overview of Development Process & Low-Income Housing Tax Credit Program
  - 2 Understanding 4% and 9% Credits
    - Basis and Credit Calculation
      - 4 Financing a Sample Project
        - **5** Qualified Allocation Plan (QAP)
          - Evaluating Projects, Subsequent Awards, and Compliance
            - Questions

## **Questions?**

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