



NAHMA Joint Policy Committees Discussion

MARCH 6, 2024

Regulatory Affairs

1. **Budget Based Rent Adjustments for Mark-to-Market Properties** [Notice](#) Published; March 12
- HUD training on the notice at 1PM EST ([registration link](#) to join)
2. Request for [Feedback on Existing Policy on Non-Rent Fees for Subsidized Multifamily Housing Programs](#) Posted to the Drafting Table; NAHMA Deadline COB, March 26th, HUD Deadline March 29th
3. **Managing HUD Multifamily Properties:** [Back-to-Basics Video Series](#)
4. [Family Self-Sufficiency \(FSS\) Annual Report Survey](#); respond by March 15, 2024;
5. **TRACS Access/User Recertification/Security Awareness Training Requirements** MUST be completed by March 14, 2024.
6. [Approval and Processing of Requests to Bifurcate Contracts](#) Notice
7. [2024 OCAFs published](#) (Nov. 30, 2023)
8. **Required & Alternative MOR Procedures for Performance Based Contract Administrators (PBCAs)** [Guidance Memo](#) (Nov. 6)

Regulatory Affairs

1. HOTMA Implementation

- HUD-MFH [Resource Page](#); HUD-PIH [Resource Page](#)
- New Implementation Guidance Published and Notice Published Extending HOTMA Compliance Date for TSP and EIV Policies & Procedures from March 31, 2024, to May 31, 2024

2. NSPIRE Implementation – [website](#)

- Member Challenges: Software, Accessing Inspection Reports, Data Inconsistencies, Inspection Duration/Frequency

3. New Member Concerns?



Senior Housing

1. **FY 2023 Section 202 Supportive Housing for the Elderly NOFO, \$115 million Available**; Deadline: Jun 20, 2024
2. **Service Coordinator NOFO; \$40 Million available**; Deadline: 04/09/2024
3. Other Member Issues?



Fair Housing

- 1. No Good Cause for Discrimination: Some Evictions Are Never Allowed**
[Factsheet](#)
- 2. Other Member Issues**

Tax Credit

1. Tax Relief for American Families and Workers Act of 2024 ([Bill/Summary](#))

- Allows for financing of more than 200,000 new rental homes with LIHTC and multifamily Housing Bonds
- **State Housing Credit Ceiling Increase for Low-Income Housing Credit** - restores the 12.5 percent increase for calendar years 2023 - 2025
- **Tax-Exempt Bond Financing Requirement** —This provision lowers the bond-financing threshold to 30% for projects financed by bonds with an issue date before 2026. This section provides a transition rule for buildings that already have bonds issued by requiring that a building must have 5 percent or more of its aggregate basis financed by bonds with an issue date in 2024 or 2025. This provision is effective for buildings placed in service after December 31, 2023. In the case of rehabilitation expenditures, which are treated as a separate new building by the IRS, the building is considered placed in service at the end of the rehabilitation expenditures period. The 30 percent requirement is applied to the aggregate basis of both the existing building and the rehabilitation expenditures.
- House passed, just awaiting Senate consideration and passage; Senate Negotiations ongoing
- [Cross-stakeholder affordable industry + coalition advocacy](#) ongoing; continue to contact Senators

2. Member have expressed interest about HOTMA and NSPIRE to LIHTC properties

3. Other Issues

Rural Housing

1. Revisions to the Smoke Alarm Requirements; Comments due on or before **March 8, 2024**
2. **Set-Aside Unit Preferences at Properties with Other Funding Sources** (Guidance)
3. FY 2023 Multi-Family Housing (MFH) Annual Occupancy Report
4. **Multifamily Preservation and Revitalization Program** tentatively scheduled for release in Summer 2024
5. Feedback on **New Physical Inspection Process**?
6. **2025 Mgmt. Fees Survey**: RHS is in initial stages of developing the management fee survey for 2025 Management Fees and need input from NAHMA members.
 - Do you have input or suggestions on questions/topics we should include in the survey to make the survey more informative/comprehensive? They are looking for any feedback on what our stakeholders are facing.

Congress – Funding Uncertainty

- **FY24 Funding Bill At a Glance**

- **\$1.25 billion** for the **HOME Investment Partnerships Program**
- **\$100 million** for the second year of the **“Yes In My Back Yard” grant program**
- **\$32.4 billion** for **tenant-based Section 8 vouchers**
- **\$16 billion** for the **project-based rental assistance program** to renew housing contracts
 - **\$468 million** for **PBCAs, states:** *“The agreement prohibits HUD from issuing a solicitation or accepting bids on any solicitation that is substantially equivalent HAPSS 2022....The agreement directs HUD to ensure that any future funding arrangements for PBCAs do not impede housing finance agencies or PHAs from competing on a state-basis. Should HUD determine that a subsequent draft solicitation that is not substantially equivalent to the July 27, 2022 draft solicitation is not feasible, the agreement directs HUD to include a legislative proposal as part of the fiscal year 2025 budget request with detailed analysis for why such changes are needed in order to avoid a disruption in PBCA activities. If HUD determines that a legislative proposal is necessary, HUD is directed to work with relevant stakeholders to ensure any potential legislative proposal results in effective and efficient oversight and monitoring of the PBRA program, quality services offered to property owners in each state, and maintains safe, stable, and affordable housing for the over 1,300,000 households living in PBRA properties across the country. The agreement recognizes that HUD faces a complicated task of developing new PBCA arrangements before the existing agreements expire and expects the Department to liaise with the House and Senate Committees on Appropriations, the House Committee on Financial Services, and the Senate Committee on Banking, Housing, and Urban Affairs on any necessary changes.”*

Congress – Funding Uncertainty

■ FY24 Funding Bill At a Glance

- **\$8.8 billion** to **operate and address the capital needs of public housing** (\$5.475 billion for operating fund and \$3.2 billion for capital fund)
- **\$913 million** for the **Section 202 program**
 - **\$112 million** for service coordinators
- **\$208 million** for the **Section 811 program**
- **\$400 million** for **Multi-family guaranteed (sec. 538)**
- **\$34 million** for **Multi-family housing revitalization program**
- **\$1.608 billion** for the **Section 521 Rental Assistance Program**. “The agreement accepts the Department's proposal to decouple the Rental Assistance Program from Section 515 direct loans. This strategy should only be used when all other methods of preservation are exhausted and should prioritize properties that are near maturity. In implementing this policy, the agreement directs the Department to have strong stakeholder engagement and to provide the Committees with monthly updates on the implementation of this policy.”
- **\$48 million** for the **Rural Housing Voucher (Sec. 542)**

Federal Affairs

Biden-Harris Administration Housing Priorities

- [Blueprint for a Renters Bill of Rights](#) (agency updates under other relevant committees) and [Housing Supply Action Plan](#)
- Recent Actions:
 - [FACT SHEET](#): President Biden Announces New Actions to Lower Costs for Americans by Fighting Corporate Rip-Offs
 - [FACT SHEET](#): Biden-Harris Administration Announces New Actions to Boost Housing Supply and Lower Housing Costs
 - [Promoting prospective renters' rights during tenant screening process](#). FTC, CFPB, DOJ, and HUD will soon jointly publish a fact sheet describing the rights prospective renters have when screened by housing providers.

Inflation Reduction Act Implementation (Dept. of Energy, Treasury, HUD, EPA)

- [FACT SHEET](#): Biden-Harris Administration Takes Action to Cut Energy Bills, Housing Costs and Climate Pollution
- HUD [Funding Navigator Tool](#) (Find Funding Opportunities) and [Climate Resources for Housing Supply Framework](#)
- [Press Release](#): U.S. Department of the Treasury, IRS Release Final Rules on Provisions to Expand Reach of Clean Energy Tax Credits

Bipartisan Infrastructure Law ([Broadband/Closing Digital Divide](#))

- HUD [Announces Expansion of the ConnectHomeUSA Initiative](#) to Bridge the Digital Divide for HUD-Assisted Families; [Application Deadline Extended](#) to April 12, 2024
- [HUD Encourages Participation](#) in Locating Homes and Businesses that Lack Internet Access; BEAD Program Challenge Process Opening; [Webinar](#)