

2019 (FFY18) National Housing Trust Fund Notice of Funding

Availability

Instructions

The application deadline and process requirements vary based on the other funding sources involved:

1. Not using low-income housing tax credits (LIHTCs): submit the application spreadsheet by December 15th; other documentation requirements will follow
2. Submitted an application for LIHTCs in 2018 and changing sources: submit the application spreadsheet by December 15th
3. Newly applying for 4% LIHTCs and tax-exempt bonds: follow the normal process for those using HOME by March 7th (preliminary application), listing NHTF as a source instead; also submit the NHTF application spreadsheet scoring tab
4. Applying for 9% LIHTCs in the 2019 competitive round: follow the QAP process for HOME loans (preliminary applications due March 7th); also submit the NHTF application spreadsheet scoring tab

GHFA will accept applications to The Georgia Department of Community Affairs, 60 Executive Park South, NE, Atlanta, Georgia 30329. Applicants should label the file "NHTF NOFA" and save it to a flash drive.

Note that developers/owners may not undertake choice-limiting actions after requesting NHTF funds. See the 2018 Qualified Allocation Plan for more specifics.

Frequently Asked Questions

1. Does an Annual Contributions Contract qualify as PBRA?

Yes, an ACC commitment counts as project-based rental assistance.

2. Are we able to use Income Averaging with NHTF? I know that we cannot use IA with HOME funds, so would like confirmation that we are able to use IA with NHTF.

Yes, applicants will be allowed to use income averaging. However be aware that the IRS calculation of 30% area median income is not the same as HUD's Extremely Low Income (ELI). All NHTF projects will need to have ELI units. If these also have a designation of 30% AMI, owners will have to comply with whichever is lower.

3. Do we need a market study for the December 15th deadline?

No, developers not using low-income housing tax credits submit the Core application by that date. Otherwise the standard application process applies (plus submitting by March 7th and listing NHTF as a source).

4. The NHTF NOFA states that “All NHTF units must be affordable to and occupied by extremely low-income (ELI) households with incomes at or below 30% of Area Median Income (AMI).” Is the intent of DCA’s language to limit the incomes at the NHTF units at 30% AMI or the annual NHTF income limits (which can be higher than 30% AMI)? The state’s consolidated plan states that the Applicant must certify that all tenants of an NHTF-assisted development will meet the income limits as required by the relevant program guidelines (page 167 of the Consolidated Plan).

Consistent with 24 CFR 93.250, because the national annual allocations have been less than \$1 billion, 100% of our NHTF funds will be used for extremely low-income families or families whose incomes are below the poverty line.

The income limits under this NOFA follow the HUD published [2018 HTF Income Limits](#), which are the greater of the incomes for extremely low-income families or families with incomes at or below the poverty line.

5. Project Based Rental Assistance:

“The most recently published stand-alone DCA NHTF Allocation Plan (from 2017) includes the following threshold item:”

The Applicant must provide a Commitment for Project Based Rental Assistance (PBRA) for all NHTF units for a minimum of 15 years. This will allow all NHTF units to serve those individuals at 30% of the AMI.

“For our proposed development, there will not be any PBRA on the property, but cross-subsidization through income averaging will allow the NHTF units to be financially feasible without PBRA. Is our project ineligible under this NOFA without PBRA?”

The above-referenced PBRA Threshold requirement comes from an NHTF Allocation Plan that was published prior to the advent of the income averaging set-aside option. Going forward, DCA will consider waiving the above requirement that PBRA must subsidize all NHTF units, provided applicants can demonstrate financial feasibility for said units through cross subsidization, either through income averaging or market-rate units.

Applicants should be reminded that the 30% AMI level under the Housing Credit is not the same as the Extremely Low-Income (ELI) restriction under the National Housing Trust Fund. Owners of properties

with both sources should be mindful of the difference. Please see the [HUD Exchange](#) for NHTF income and rent limits.”