

Rent & Income Limit Calculator ©

If you would like to engage Novogradac & Company LLP to calculate the rent & income limits for your property, please contact Thomas Stagg at thomas-stagg@novoco.com.

Click on the [™] icons below to view historical charts.

Affordable IRS Section 42 Low-Income Housing Program Housing Tax Credit (LIHTC)

Year (1)(2) 2024 (effective 04/01/24)

State FL

Program and Location Information

County Hernando County

MSA Tampa-St. Petersburg-

Clearwater, FL MSA

Persons / Bedroom

1.5 Person / Bedroom

4-person AMI N \$92,000

National Non- \$77,400 Metropolitan

Median Income (3)

HUD Published 50% National on-Metropolitan

\$38,700

Non-Metropolitan Median Income

Hold Harmless (6) You have indicated that your project was placed in service

on or after 04/01/2024 and is therefore eligible to have its

HUD Published Income Limits for 2024 (with no adjustments)

O Display Income Limits

O Hide Income Limits

income and rent limit held harmless beginning with the 2024 limits.

Placed in Service Date ⁽⁷⁾ On or after 04/01/2024.

Rent Floor Election ⁽⁸⁾⁽⁹⁾

Effective on or after

04/01/2024.

LIHTC Income Limits for 2024 (Based on 2024 MTSP Income Limits)

	Charts	60.00%	40.00%	60.00%	80.00%	140.00%
1 Person	₽ *	40,140	26,760	40,140	53,520	56,196
2 Person	₽ *	45,840	30,560	45,840	61,120	64,176
3 Person	₽ *	51,600	34,400	51,600	68,800	72,240
4 Person	₽ *	57,300	38,200	57,300	76,400	80,220
5 Person	₽ *	61,920	41,280	61,920	82,560	86,688
6 Person	₽*	66,480	44,320	66,480	88,640	93,072
7 Person	₽*	71,100	47,400	71,100	94,800	99,540
8 Person	₽*	75,660	50,440	75,660	100,880	105,924
9 Person	₽*	80,220	53,480	80,220	106,960	112,308
10 Person	₽*	84,780	56,520	84,780	113,040	118,692
11 Person	₽*	89,400	59,600	89,400	119,200	125,160
12 Person	₽*	93,960	62,640	93,960	125,280	131,544

LIHTC Rent Limits for 2024 (Based on 2024 MTSP/VLI Income Limits)

Bedrooms (People)	Charts	60.00%	40.00%	60.00%	80.00%	FMR
Efficiency (1.0)	₩.	1,003	669	1,003	1,338	1,449
1 Bedroom (1.5)	₩.	1,074	716	1,074	1,433	1,562
2 Bedrooms (3.0)	₩.	1,290	860	1,290	1,720	1,851
3 Bedrooms (4.5)	₩.	1,490	993	1,490	1,987	2,367
4 Bedrooms (6.0)	₩.	1,662	1,108	1,662	2,216	2,888
5 Bedrooms (7.5)	N	1,834	1,223	1,834	2,446	

Before using the numbers from the Rent & Income Limit Calculator©, we strongly recommend that you check with the applicable state housing agency to verify that the state agrees with the numbers. The numbers round down to the nearest \$1.

Please note the following for households over 8 people. Per the HUD briefing material "HUD does not include income limits for families with more than eight persons in the printed lists because of space limitations. For each person over eight-persons, the four-person income limit should be multiplied by an additional 8 percent. (For example, the nine-person limit equals 140 percent [132 + 8] of the relevant four-person income limit.) HUD rounds income limits up to the nearest \$50. Local agencies may round income limits for nine or more persons to the nearest \$50, or they may use the un-rounded numbers." To account for areas that may round to the nearest \$50, the calculator also rounds to the nearest \$50 for these household sizes as this will always result in a lower amount than rounding up. If you are qualifying a household over 8 people please check with your local agency for what their policy is in relation to rounding.

Revenue Ruling 89-24 require that the LIHTC rent & income levels start their calculations with the HUD published very low-income (VLI) amounts because the HUD published VLI amounts include certain HUD adjustments, such as high housing cost for high FMR areas to increase income, and state non-metropolitan median income to provide a floor for income limits. The result is that many counties have VLI amounts that are different than 50% of the AMI published by HUD (the 4-person AMGI we have shown above). Please see this <u>blog post</u> for more information about the HUD adjustments. The Novogradac Rent & Income Calculator© starts by default with the HUD published VLI amounts in accordance with <u>Revenue Ruling 89-24</u>.

(1) The rent and income limits for each year are effective beginning with the effective date shown above. There is a grace period for 45 days from the release of income limits to implement the new rent and income limits, which means that the old limits can be relied upon for 45 days after the release date of the new limits. For example income limits effective 12/04/2012, can be relied on until 1/17/2013. For more information, see <u>Revenue Ruling 94-57</u>.

IRS LIHC Newsletter #48 and IRS LIHC Newsletter #50 clarify that for projects placed in service during the 45-day grace period, the owner may choose the new or the old income limits. For example, if a project was placed in service on 1/8/2013 and the 2012 income limits are higher than the 2013 income limits, an owner may use the higher income limits from 2012 to income qualify tenants and set rents accordingly because the project was placed in service with the 45-day grace period.

Please note, the Rent & Income Limit Calculator© does not apply a 45-day grace period automatically. The user needs to indicate that the placed in service date and/or gross rent floor date occurred 45 days earlier (in the prior HUD Fiscal Year) if they want to apply the 45-day rule under Revenue Ruling 94-57 that allows owners to rely on the prior year. Therefore, projects that were placed in service during the 45-day grace period, and want to use the prior year, should select that they were placed in service as of the prior year. For example, if a project placed in service on 1/8/2013, and the project wanted to use the 45-day grace period, the user should select that their project was in service prior to 12/4/2012. Similarly, projects that have a gross rent floor effective as of the carryover allocation date (or reservation letter date for bond projects) during the 45-day grace period, and want to use the prior year, should select that the gross rent floor was effective as of the prior year. For example, if a project received a carryover allocation letter

on 1/8/2013, and the owner did not elect placed in service date as the gross rent floor, and the project wanted to use the 45-day grace period, the user should select that their gross rent floor was effective prior to 12/4/2012.

- ⁽²⁾ For HUD FY 2013 HUD originally issued income limits on December 4, 2012 then issued revised income limits on December 11, 2012. In <u>IRS LIHC Newsletter #50</u>, the IRS has stated that the effective date for the revised FY 2013 income limits is December 4, 2012. Based on this guidance, the Rent & Income Limit Calculator© uses December 4, 2013 for the effective date for the revised FY 2013 limits. Please see IRS LIHC Newsletter #50 for more detail.
- (3) An area may lose its rural area status. There is no clear guidance that a project is held harmless at the national non-metropolitan income limits when an area loses its rural status. The Rent & Income Limit Calculator© assumes that a project that is not indicated as rural in the current year was also not rural in the prior year, and therefore, does not receive hold harmless treatment based on the prior year national non-metro amount.

Please consult your state agency and tax advisor for further clarification.

(4) USDA may change their determination of what projects qualify as rural during the course of a year. Please periodically check with USDA to determine the continued rural eligibility of your project.

The national non-metropolitan median income has been calculated using the 50% national non-metropolitan median income as shown in each year's HUD FAQ.

For 2023 HUD has applied a cap on the increase in the 50% national non-metropolitan median income as shown in 2023's HUD FAQ, consistent with how HUD caps changes in Very Low Income. Although it is unclear if a cap should be applied to the LIHTC limit based on national non-metropolitan median income, the calculator has used HUD's published 50% figures.

Please check with your state agency as to if the national non-metropolitan median income should be capped or not.

- (5) A project uses HERA Special if income was determined prior to 1/1/2009 and the project is in a HERA Special county. A project's income limits are held harmless at the prior year income limits if income was determined in the prior year or earlier and the income limits have decreased. Please note that the IRS has informally indicated that the definition of "determined" for purposes of the HERA Special and MTSP Hold Harmless income limits means that a project was placed in service. Please see IRS LIHC Newsletter #35 for more information about "determined" and projects with buildings that were placed in service before and after HUD income limit effective dates. Therefore, projects placed in service prior to 1/1/2009 are generally eligible for HERA Special. Please see footnote 7 for information about acquisition/rehabilitation projects.
- ⁽⁶⁾ Internal Revenue Code Section 142(d)(2)(i) indicates that hold harmless applies on a calendar year. The Rent & Income Limit Calculator© assumes that "calendar year" in the hold harmless rule means the HUD Fiscal Year. For example, the 2009 calendar year means the HUD Fiscal Year from 3/19/2009 through 5/13/2010. In other words, the Rent & Income Limit Calculator© assumes that "calendar year" in the hold harmless rule means the highest income

level achieved during any HUD Fiscal Year.

The Rent & Income Limit Calculator© assumes that a rural project will receive hold harmless treatment at the national non-metro amount based on the prior year national non-metro amount if the national non-metro median income were to fall from year to year. If a rural project qualifies for HERA Special and the HERA Special is higher than the national non-metro, then the HERA Special amount will be used. Please note that the IRS has not issued guidance that specifically allows hold harmless treatment at the national non-metro amount for rural projects, however, Internal Revenue Code 42(g)(4) by reference to Internal Revenue Code 142(d)(2)(E) implies that hold harmless treatment would apply at the national non-metro amount for rural projects. Please consult your tax advisor for further clarification.

- ⁽⁷⁾ Please note that for acquisition/rehabilitation projects, the IRS guidance indicates that income and rent limits are determined at the later of the acquisition date or when management begins income-qualifying households in the project. For example, if a project was acquired in 2011, the rehabilitation was placed-in-service in 2012, and management began income-qualifying households in 2011 then the project would be considered placed in service in 2011 for income and rent purposes. If a project was acquired in 2011, the rehabilitation was placed-in-service in 2012, and management began income-qualifying households when the rehabilitation placed-in-service in 2012, then the project would be considered placed in service in 2012 for income and rent purposes. Please see IRS LIHC Newsletter #35 for more detail. Please consult your tax advisor for further clarification.
- (8) Revenue Procedure 94-57 gives guidance on the gross rent floor election.

Tax credit projects without bond financing:

"The Internal Revenue Service will treat the gross rent floor in section 42(g)(2)(A) as taking effect on the date an Agency initially allocates a housing credit dollar amount to the building [generally referred to as the 42M letter] under section 42(h)(1). However, the Service will treat the gross rent floor as taking effect on a building's placed in service date if the building owner designates that date as the date on which the gross rent floor will take effect for the building. An owner must make this designation to use the placed in service date and inform the Agency that made the allocation to the building no later than the date on which the building is placed in service."

Tax credit projects with bond financing:

"The Service will treat the gross rent floor as taking effect on a building's placed in service date if the building owner designates that date as the date on which the gross rent floor will take effect for the building. An owner must make this designation to use the placed in service date and inform the Agency that issued the determination letter to the building no later than the date on which the building is placed in service."

(9) The Rent & Income Limit Calculator© assumes all buildings in a project have a rent floor effective date under Revenue Procedure 94-57 in the same HUD Fiscal Year. However, if your buildings have rent floor effective dates under Revenue Procedure 94-57 in different HUD Fiscal Years, then you should run the calculator separately for each group of buildings in a particular HUD Fiscal Year.

The Rent & Income Limit Calculator© assumes that different AMGI limits (40%, 35%, 30%, etc.) chosen by the user will

also have a rent floor election under <u>Revenue Procedure 94-57</u> from the same HUD Fiscal Year that applies to the federal level of 50% or 60%.

(10) The Consolidated Appropriations Act of 2014 changed how the 30% income limits is calculated. The 30% limit, which is now called the extremely low income limit, is determined by taking the greater of the 30% income limit as calculated by HUD or the poverty level as determined by the Department of Health and Human Services, which is then capped at the 50% Very Low Income Limit ('VLI') published by HUD. HUD has only published the data up to 8 people. For household sizes above 8 people please visit the following website: https://www.huduser.gov/portal/datasets/mtsp.html

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