If enacted as proposed, the Neighborhood Homes Tax Credit would make about $2 billion in annual tax credit authority available nationwide. In this week's Tax Credit Tuesday podcast, Michael Novogradac, CPA, and Novogradac housing policy consultant Mark Shelburne discuss considerations for state allocating agencies as they prepare for potential enactment of the Neighborhood Homes Tax Credit. They discuss Neighborhood Homes Tax Credit basics, how the incentive compares and contrasts with the low-income housing tax credit, issues for allocating agencies to consider about administration and next steps for allocating agencies, developers and investors.

Summaries of each topic:

1. Neighborhood Homes Tax Credit overview (2:46-12:50)
2. Comparing NHTC with the Low-Income Housing Tax Credit (12:51-16:45)
3. Considerations for Administering the NHTC (16:46-22:15)
4. Next Steps for Allocating Agencies, Developers and Investors (22:16-30:05)

Episode Transcript

[00:00:10] **Michael J. Novogradac, CPA:** Hello, I'm Michael Novogradac. And this is Tax Credit Tuesday. This is the Tuesday, October 26th, 2021, podcast. On today's podcast, we're going to talk about an exciting proposal that could help build and rehabilitate more than half a million homes in the next decade. I'm talking about the neighbored homes tax credit or NHTC. The neighborhood homes tax credit is designed to incentivize new construction and rehabilitation of owner-occupied homes in distressed neighborhoods and rural areas. If enacted as proposed, the NHTC would make about $2 billion in annual tax credit authority available nationwide.

The NHTC should sound familiar to our regular Tax Credit Tuesday listeners. I discussed an overview of the incentive on the podcast back in July with my partner, Dirk Wallace. We also spoke then about the neighborhood's tax credit working group that Dirk and my other partner, John Sciarretti lead. If you're interested in learning more about that, please send an email to CPAs@novoco.com.

But today we're going to take a deeper dive into how allocating agencies might administer the neighborhood homes tax credit through qualified allocation plans or QAPs. Joining me today's podcast is Novogradac housing policy consultant, QAP expert and returning Tax Credit Tuesday guest, Mark Shelburne. Mark has worked with low-income housing tax credit QAPs for many, many states in a variety of different roles. He administered the low-income housing tax credit as director of the office of housing, finance and development at the Georgia Department of Community Affairs. He previously served as council and policy coordinator at the North Carolina housing finance agency.

These days, as housing policy consultant from Novogradac, Mark helps allocating agencies formulate and implement their QAPs. All told, Mark has revised and/or implemented 38 QAPs in 16 states and counting. So safe to say, he has valuable perspective as to how allocating agencies adopted and administer their QAPs. Mark joins me today to discuss what allocating agencies need to consider as they plan their neighborhood homes tax credit QAPs.

Now today, I want to cover four major areas. First, briefly summarize the proposed neighbor homes tax credit. Second compare and contrast the neighbored homes tax credit with the low-income housing tax credit. Third, talk about how allocating agencies might approach administering the neighborhood tax credit. And fourth, discuss what developers and investors can do to prepare for this potential incentive. We have a lot of new ground to cover, so if you're ready, let's get started. Mark. Welcome back to Tax Credit Tuesday.

[00:02:52] **Mark Shelburne:** Yes. Glad to be here. Thanks for having me back.

[02:46] Summary of NHTC

[00:02:56] **Michael J. Novogradac, CPA:** As I mentioned in the intro, an episode of Tax Credit Tuesday in July provided a broad explanation of the neighborhood homes tax credit. We went into a bit of detail, so we don't need to cover the basics and as much detail here today. Listeners who would like more detail, you can go back and listen to that July episode with my partner, Dirk Wallace. But I do think some level-setting is needed. So if you could provide a high-level overview about the neighborhood homes tax credit for listeners who may be unfamiliar with the proposed incentive.

[00:03:23] **Mark Shelburne:** Certainly. The highest level aspect to note is it is for ownership. It's for real estate, which is owned by the occupant. And that is the number one distinction between it and the low-income housing tax credit. And it's meant to cover the gap between the cost of building or renovating the houses and the price at which they could be sold. And it also helps existing owners rehabilitate their homes and. It’s very targeted in where it can operate: It's communities with high poverty rates, low median family incomes and home values. And there's a lot more specificity to that that folks can find and there's ways to see exactly which jurisdictions in which this activity can take place.

Again, it can be done for properties that are newly built or substantially rehabilitated for sale. And so in that context, eligible purchasers must have incomes at or below 140% of the state area median income. And then the other use can be rehabilitation of homes for existing owner occupants. In that circumstance, the eligible homeowners must have incomes at or below the state area median income. And there's a lot more we can say, but as Mike noted, there is an excellent podcast with Dirk explaining all these specifics.

[00:04:49] **Michael J. Novogradac, CPA:** Well, thank you for that. As a former allocator and now housing policy consult at Novogradac, what excites you the most or what are some of the things that excite you? It's probably more than one thing.

[00:05:00] **Mark Shelburne:** Well, it's really an excellent combination because it's almost a universal reality across our country. You can just say in any setting, no one's building starter homes. They're just not available and you will get widespread head nodding and agreement. It's just an understood circumstance. And so when that happens, I characterize that as a market failure, there is a demand for folks early in their adult lives to buy houses and they're just not for sale in many markets. When you've got what I characterize as a market failure, there's a need for government to step in and do something. And the approach that's happening here is modeled after the low-income housing tax credit. I've worked with maybe a dozen, depending on how you define it, different housing programs and the way that the low-income housing tax credit works by an incorporating the tax code makes it a truly uniquely successful program. Bringing those two together makes this a really exciting prospect, plus it's always, it's just inherently interesting whenever something's brand new and getting started because there's so much to decide and figure out.

[00:06:24] **Michael J. Novogradac, CPA:** And I know for myself, I'm excited at the potential for this tool to help revitalize distressed communities. We have rental housing that's built in distressed communities can help revitalize those communities. We have the new markets tax credit for commercial for non-residential uses in distressed areas in low-income communities. The new markets tax credit can be used for a bit for for-sale housing, but it is a challenging structure, but it does get used for that purpose. This would be a targeted incentive for, as you note, for-sale homeownership in distressed areas, as well as renovation costs for existing homeowners. So the focus of the podcast is on state agencies and their qualified allocation plans. Before getting into some of the specifics, since you work with so many housing agencies, what are they saying about the neighborhood homes tax credit? How excited are they?

[07:18] Allocating Agencies

[00:07:18] **Mark Shelburne:** I reached out to several in the last few days to get some more specific feedback and input on that and I heard from a friend of mine in the agency in Minnesota. Right now, their focus has been on all these extensive federal resources that have come their way to administer. And so their bandwidth to pay attention to a program that is as yet not enacted is limited. That has been the most common perspective among agencies. I realized that may not be what some folks want to hear, but that's just the reality and I can't blame them. There's hardly been another time in history when there's been as much put on agencies–and gladly so. They want the resources, they want the responsibility, but it all takes time. And only comparable time I would think would be back in 2009 and it's for similar reasons.

But several of them have gotten started. There are particularly a couple that I don't know that they want to be identified just yet, that have picked out who's going to manage the program on staff and that's an important step for them to know who that is. And there's probably some others that have done that as well, I just have only heard from those two. I would like though to call out Vermont, they have clearly done some very advanced, sophisticated thinking about this program and how it will and won't work in their state. And so there looks to me to be a future leader in this program and how it gets carried out.

[00:08:55] **Michael J. Novogradac, CPA:** So that's a good overview. Now let's get a little bit more specific and talk about qualified allocation plans. Now the concept of qualified allocation plans, or QAPs, some people call them "quaps," but I they're always QAPs to me. I see you're shaking your head. So QAP, the process familiar to those who work with the low-income housing tax credit: state allocating agencies are required by state to adopt qualified allocation plans to set forward their allocation priorities and establish application scoring rubrics and the like. Some get done directly through the QAP. Others have a QAP followed by regulations and other tools that implement the qualified allocation plan. So maybe you could discuss for our listeners the significant concept of QAPs as they apply to the neighborhood homes tax credit.

[00:09:42] **Mark Shelburne:** The most significant document that anyone can point to with this program, at least early on, because as Section 42 says about the low-income housing tax credit, this introduced legislation has exactly the same phrasing where it says the amount of tax credit will be zero. That's the word it uses, zero, unless allocated pursuant to a QAP. So the QAP has to be there. There's one of those in every state for the low-income housing tax credit. And you're absolutely right. That document isn't always the one that is the operative one. There's some policies in some states at manuals, regulations, etc., but they all have a QAP and every state will have one for the neighbor homes tax credit because they have to by law. But even if that wasn't part of the federal code, it would absolutely make sense to do because agencies need a document which tells the world and themselves how they're going to administer this program.

[10:52] Developer, Investor Issues

[00:10:52] **Michael J. Novogradac, CPA:** If I'm a developer or investor. Should I just wait until the state adopts their QAP and then see how it applies?

[00:11:00] **Mark Shelburne:** You should wait on certain aspects like buying land, for example, unless you're willing to roll the dice that the land you buy is not going to fit with the QAP. That's about the only thing on which you should wait as a non-agency participant. There's no reason to wait on two other activities. Number one, learning how this program works and the credit calculation, etc. All those things, are from a federal perspective, there's tremendous amount to get your head around for this program. And just because it's new, not because it's particularly complicated. If anything, it's less complicated than some other similar type activities. Because it's new, there's things that you've got to learn and maybe unlearn relative to your experiences with those other programs. There's that. And also, though, it's not too soon to think about what you want your state to do with this resource. Maybe right at this very minute, it's a little premature to submit that kind of input, but the minute this is enacted, maybe even as it's clear that it's going to be enacted, it's absolutely appropriate to reach out to your agency to say, here's what we see as a logical priority. And agencies always want that kind of feedback, but they're especially going to want it with this new program because when they hear that, what they're going to hear is OK, if we put this concept in our document, then at least one person this who is commenting is going at least try to make that happen because they told us that we will. And that's going to be a real challenge for agencies is how do you write the rules to then have folks –the developers and the funding sources–then make that happen.

[00:12:51] **Michael J. Novogradac, CPA:** You have the benefit here of having states having issued qualified allocation plans for low-income housing tax credits and having learned a lot about implementing systems like this and incentives like this credit. And I would just note for those that aren't as familiar with the low-income housing tax credit, back in the day that when the low-income housing tax credit was first created, you actually had to get the allocation and place the building in service all in the same year and that was totally a design flaw. And it took a statutory correction a couple of years later to where you could actually get the allocation and then go build the project, versus get the allocation and place a project all in the same year. That's just a point that if you're not careful with the design of the statute, you can end up needing amendments later or if you're not careful with the QAP and the requirements of the QAP, you could find that you do have some requirements that aren't very feasible for most transactions. But sticking with the low-income housing tax credit QAPs for a moment, what frameworks or principles do you think are in low-income housing tax credit qualified allocation plans that would be applicable or could be built off of for the neighbor homes tax credit?

[00:13:56] **Mark Shelburne:** This may be into the weeds, but the organizational structure of those documents, I think will be very helpful to use for these new documents to be created. The concept, as I break it out, there are set-asides, which may or may not happen for this new program, but that's creating distinct competitions, whether it's new construction-rehab, which makes a lot of sense in the low-income housing context probably would in this context as well.

And you could have geographic set-asides. So again, it's creating distinct competitions for the resource, which again, that may or may not make sense in the beginning year, it makes more or less sense also, depending on the size of the state. In larger states, you can have more of those and have legit consequential competitions. And then the other aspect are going to be the threshold requirements. And those are probably in these early years, is going to be some of the most important to figure out: what are the things that this proposal to use this resource has to demonstrate in order to receive an award and then a subsequent allocation.

And there's some things in the law that talk about what has to be there, the agency has to consider but there's going to be a lot of things that isn't in the law that the agency to figure out. I'm certain that very quickly, this will become like these other programs where demand vastly exceeds supply. There will need to be a selection criteria that decides the winners and the losers and that's going to be absolutely necessary to figure out. Then last but not least, of course, will be the underwriting and that's going to be the hardest to figure out in these early years. And some of that may have to get left for later to be figured out.

[00:15:46] **Michael J. Novogradac, CPA:** Let's talk about that underwriting for a second, or maybe not so much the underwriting as much as the focus and structure that the applicant takes for the application. Because that neighborhoods tax credit is modeled after the low-income housing tax credit, but there are important differences between the two as we've discussed before. For our listeners, I would just note if that low-income housing tax credits are gap financing for a given real estate development. And when a sponsor applies for a low-income housing tax credit allocation, the project itself is underwritten, the sources and uses of that real estate, is underwritten by the state. In most cases, it's on a single site, there are six scattered sites, but nonetheless there's sources and uses at the state underwrites and the state agency only allocates the tax credits needed to make that development financially feasible. Now in contrast here, with the neighborhood homes tax credit we have a credit for the development and renovation of for-sale housing, as you mentioned, it's also in part for renovation of existing homes. So let's talk about the portion that's used for-sale housing. The neighborhood homes tax credit is designed to cover the difference between the cost of a home and its ultimate selling price. So when you think about that, how that is that difference, which means if you're selling each home on the market, you don't know what it's like price it is. You don't know how much credit you need. What are some of the implications of this difference in your mind? What are some of the issues to consider in administering neighborhoods homes tax credit.

[00:17:21] **Mark Shelburne:** You've laid it out very well, that it just it's a fundamentally different distinct business model. The developer doing the work is not going to have the same kind of understanding of the outcomes that is possible with the low-income credit. And that may sound crazy to some folks who are hearing this because of what's happened in the last few years with the changes from 2016 to 2017 and the sources, the equity changes and then in the last couple of years with the prices, things like lumber going up and down, there's been tremendous uncertainty in the low-income housing tax credit market, but for the neighborhood homes tax credit, it really is just as you described, you don't know what the delta is going to be for each of these homes, let alone what they're going to be across the board.

Something that we had thought of earlier, that it could operate similar concept to a line of credit and where the resources are available and it gets pulled down with each transactions. And then something that we discussed in our working group that we'll talk about here in a little while is the way the new markets credit operates, where it's the recipient of that can pull it down as they go forward with development activity. And so that potentially is going to have to be at least something of a difference between the way this program works and the low-income credit.

[18:48] Discretion in QAPs

[00:18:48] **Michael J. Novogradac, CPA:** I like to think of it as it could be project-based, where you go in with a certain number of homes, in which case you end up potentially having to give credits back . And the state has to basically say, here's the amount of credits you actually have and if you sell them at a higher price, then you won't use as many of the credits and you'll give them back to us and we'll reallocate them to somebody else, some fashion of returning credits. And that way I'm looking at as the project-based, the other I think about is more of a business-strategy based where you give the credits subject to a business strategy and that business strategy ultimately use all those credits. You just don't know how many homes will get built, what the sales prices would be and the rest. And I would say the business strategy approach is more like new market tax credits and the project approach is more like low-income housing tax credits as they're used today.

So let's talk about the discretion states and have in drafting the neighborhood homes tax credit QAPs. They have a bit of discretion. In the areas where they don't maybe want to share some thoughts?

[00:19:48] **Mark Shelburne:** It really seems like it pretty tremendous amount, even more than with the low-income credit. Because under Section 42, agencies have to give certain kinds of preferences. Now, even those preferences are fairly broadly defined, but those have to be in the document. And then in addition to those, there's the 10 selection criteria, which aren't themselves preferences, but are aspects that agencies have to consider. With the neighborhood homes tax credit, there is no mandated incentive, no mandated or preference that has to be there and it's really just a few a selection criteria that they have to incorporate in their QAP. I have it more spelled out in the blog post on this same topic that was out a few days ago, but just to summarize, it's the need in the area of the capacity developer, the likelihood to create long-term homeownership and the contribution to neighborhood stabilization or revitalization. I'm summarizing, but those are the basic concepts that have to be in the QAP. But there's no limitation that those are the only concepts–the agency could have additional ones. And so that, again, that's of the various aspects which get informed and shaped by a public input, comments from outside parties, the selection criteria probably are the most. That's a lot of the threshold requirements, a lot of the underwriting considerations. Those are going to be things that agencies figure out. They still are going to need comments on those and that those are going to matter, but they're going to matter a whole lot, even more so for these selection criteria who comes out on top.

[21:31] Timeline, Actions

[00:21:31] **Michael J. Novogradac, CPA:** Yeah, those are great points and your point about the state agencies needing feedback early is really important. So our listeners really should be reaching out to the states and sharing their feedback once the likelihood out there at credit being enacted is very high. And your point about the low-income housing tax credits having selection criteria and priorities in the statute and the neighborhood homes being not being quite as extensive as what's in low-income housing tax credit is a good point as well, giving them a little bit more latitude. But I do suspect that over time, once enacted, I wouldn't be surprised if there are more selection criteria that Congress adds over time and maybe adds in some priorities because that's something that is always being reconsidered with low-income housing tax credits.

This is what a useful discussion about neighborhood homes tax credit and expectations as to how states could administer the incentive. Now I want to get into more of the action-oriented part of the podcast, where we discuss next steps and action items. Assuming enactment, how long do you think it would take before allocation agencies get started accepting applications and what's statutory timelines or deadlines might be in play? We're basing this off of the Ways and Means Committee-approved bill because all of this is obviously subject to being enacted and it could be changes to the draft statute, which obviously alter what you're hearing here today.

[00:22:53] **Mark Shelburne:** Absolutely. So I would say there's two high-level considerations which will have the biggest impact on how quickly the program gets set up and running.

The first is what's the effective year? What's the first year that credit is available? If it's in 2022, then agencies will do a lot of dropping I wouldn't say everything, but they'll drop a lot to make certain this happens so as to be able to have that resource go out in 2022. And if it's 2023, there will still get going. Any organization has to think about the triage and so having it start in 2023 will give agencies some more time to have this occur, not in as rushed and hurried a fashion, but obviously we don't know what the first year would be of this.

And the other consideration is the extent to which the agency has to get approval, blessing, authorization from some other component within state government. And that that's totally variable. In some states there's none of that and others, a tremendous amount, but they have to get approval from a legislature or governor, the longer this will take to move forward. And those are the two considerations, but I would say that it, at a minimum, it's going to take several months from enactment to get these up and going, because the other consideration, even though unlike with the low-income housing tax credit, there's no public hearing requirement. There is a requirement to get public comment. That's pretty widely understood to be at least a month. And that process will take again, at least a month, maybe two. That could be modified by, controlled and effected by other state administrator procedure expectations. But yes, I would say from an accurate to getting started, probably the quickest it could happen,I would say, it'd be six months and that would be with everything hitting just right..

[00:24:55] **Michael J. Novogradac, CPA:** So what steps can agencies take now?

[00:24:59] **Mark Shelburne:** The ones that have identified who is on point to do this work have really taken a good step because that individual will have at least in the back of their head they'll be doing some work on getting their mind around it and will operate as they'd fill in another task. So that's an important step, but it's a difficult one because the expertise doesn't really exist right now in any one person, which is totally understandable because it brings in these different functions. We've talked a lot about the low-income housing tax credit, but in that work, you don't encounter a lot of things that are very important in the homeownership context, because it's not a homeownership program.

And so those are two pretty distinct sets of understandings and expertise. So that person is going to need to start gaining that other knowledge base and expertise. And of course, everyone that could be involved in this, not just that one person, because it's going to take more than just one person, is going to need to just understand as much as they can and one of the best ways to do it is to join our working group. We've already had a few meetings and they've been really informational and educational and they're just going to keep getting better. And so hopefully folks will sign up for that and then get to where they learn. And just to contact us in general and myself and others with the firm who have some expertise in how this is going to work.

[00:26:27] **Michael J. Novogradac, CPA:** So that's great advice for allocating agencies. How about for developers and investors?

[00:26:32] **Mark Shelburne:** Yes. I would say that the main thing they could look to, the two main things they can do now are to get their head around how this program might work for them. And it's going to be really tempting for some of them to say, this is too distinct from our work, this is not what we do, but I think that'd be a mistake to write it off upfront, initially. Now it's possible that will be the outcome for a particular developer or investor, but I think it's too soon for anyone in any of those roles, lenders also, to say they don't want to have any part in this because this just not well understood enough out in the world and it's entirely possible that someone who writes it off could have been a real leader, it could have had a lot of activity and involvement and work in this industry. And so they really need to try to understand how it could work for them. And, and for developers in particular, the other thing they can start doing is looking at the maps that are available, because they are out there, to start seeing which jurisdictions and thinking about where they could potentially do deals.

[00:27:40] **Michael J. Novogradac, CPA:** I agree with you. It seems like every developer and investor should at least give it a look and look at the dynamics. From a developer perspective, it's an additional tool to develop distressed communities. For investors, it's an additional way to invest, get a return and also do good at the same time. And for investors it'll have unique investment characteristics that they might find attractive. So it does seem like they, at a minimum, should get an understanding of the credit and decide if it's something that fits for them. And if they decided it does fit for them, they can get certain first mover advantages and the rest.

It's also something out there, if they do end up being interested in it, they do want to be communicating with the various state agencies that would be allocating and developing QAPs so that the state QAP, those who draft the QAPs, have the feedback needed to ensure that they're coming up with an allocation plan that does generate financially feasible public-private partnerships.

And of course they should also think about joining the neighborhood homes tax credit working group that we have, along with contacting someone Novogradac who can even sit down and explain to you a little bit, go over details for it. We also, as I mentioned, had the earlier podcast and we have various blog posts from Mark and others. So there was lots of information on our website to learn more. And we are in the process of working on a webinar. The webinar will be coming in the next few months on the topic as well, once it's enacted. Thank you, Mark, for sharing your insights on the show today. If you could share your email with our listeners, so they know how to contact you and also if you have any parting comments.

[00:29:32] **Mark Shelburne:** Certainly email's my first and last name, Mark.Shelburne@NC-llp.com. And my only parting comments are to just reiterate and echo that the time is now to start learning how this program will and won't operate because you'll want to be the one that understands that so you can be ahead of the game.

[00:30:06] **Michael J. Novogradac, CPA:** And also, I will share your email at today's show notes. And for our listeners, you can find the show notes at www. Novoco.com/podcast. So thank you, Mark. And please do stick around for our Off-Mike segment in a few moments, when I'm going to ask you some off-tax credit topic questions, so you can share your wisdom in areas other than tax credits with our listeners.

To our listeners, be sure to tune into next week's podcast. My guest will be my partner, Tony Grappone. He's one of the lead partners in Novogradac's renewable energy tax credit practice. Tony and I will discuss some emerging issues around renewable energy and how these trends or these issues can inform developer strategies. You can make sure you're notified of that episode in each week's episode, by following or subscribing to the Tax Credit Tuesday podcast. Go to www.Novoco.com/podcast to subscribe to and stream the show on our website. You can also follow or subscribe to Tax Credit Tuesday on iTunes, Spotify, Google podcasts, Stitcher and Radio Public.

[31:00] Off-Mike Section

Now I'm pleased to reach our Off-Mike section where our guests can share some non-tax credit advice with our listeners. So, Mark, let me start with one of my favorite questions and that is what is your personal favorite or most productive time-management tip?

[00:31:13] **Mark Shelburne:** It's more about productivity itself than time management. But I have learned that a great way to get your head around a problem, or to try to understand that the situation, is to really think about it and focus on it for some period of time and then go exercise. For me, it's a bike ride, for others it could be a run outside in nature to the extent that you can. And there's really something about that the way that the brain chemistry works for at least for some people, that you'll have an insight, that there'll be a flash that will come to you by virtue of doing it in that order, in that pattern. That's been really successful for me and maybe it wouldn't be for others, but I've had some of my best thoughts and insights taking that approach.

[00:32:08] **Michael J. Novogradac, CPA:** No, that's great advice. I try to do the same. It's amazing the insight you can have while you're out getting some physical exercise.

So many people are working remotely now, or flexible work arrangements. We're indefinitely on a remote or a flexible work environment at Novogradac. What's your favorite piece of advice for achieving a good work-life balance, given these new, more flexible work arrangement?

[00:32:33] **Mark Shelburne:** Yes, thanks to your approach to the firm, I've been able to work remotely since 2015. It's been great. I've learned a lot of lessons, but a couple that stand out are to have distinct areas of wherever you are located for the distinct activities. There's a room where you work and there's a room where you sit and not work. And there's something again about the way, at least for me, my brain works that makes it so that you can have a better psyche by having those two different locations in, again, wherever you are. And the other is there comes just a point of the day where you just have to put your phone down and not look at it anymore. And maybe it's late in the day and that's OK. But maybe it's just an hour or so before you go to bed, but you just switch off so you can go ahead and wind down and then end your day.

[00:33:28] **Michael J. Novogradac, CPA:** I definitely agree with those comments and the latter part of the getting prepared for sleep, having a good routine there, so you can separate yourself there. And the physical space is really important and some of us have the luxury of being able to have physically distinct spaces between the two. For others, it's less a physically distinct space versus adjusting the environment and having it set up in a way that your work approach versus your non-work approach. So you do get those visual, physical cues that, that it's your work.

So the third and last area I'd like to get some advice from you is another one of my favorites. And that's what word of advice you would give to 20-year-old version of yourself. So outside of just giving it away, you are over 20 now. This would be a few years ago. We won't discuss how many years ago it would be, but it is a reasonable period of time. Uh, not as, not as reasonable pairing as it would be for me.

[00:34:30] **Mark Shelburne:** I joke that I'm now well into the extended-use period of my career. For me personally, I always wished that I had, taken time, I took a year between undergraduate and my graduate degrees, but I wish I'd done something a little more serious with myself during that year. Gone to Wall Street, that kind of thing. It was good to have taken time. So I'm glad I at least did that. But again for just me personally, that I wish I had done something a little more financially oriented, where I learned a little bit more about some of the things I had to learn when I finished graduate school. I really could have learned them before I went into it. I would have been better off had I done that.

[00:35:08] **Michael J. Novogradac, CPA:** Thank you again, Mark, for joining us on the podcast. That's it for now. I'm Michael Novogradac, thanks for listening.

Additional Resources

Email

Mark Shelburne

Blog post

Qualified Allocation Plans for the Neighborhood Homes Tax Credit