Low-Income Housing Credit Newsletter

Internal Revenue Service #39, April, 2010

The LIHC newsletter provides a forum for networking and sharing information about IRC §42, the Low-Income Housing Credit and communicating technical knowledge and skills, guidance and assistance for developing LIHC issues. We are committed to the development of technical expertise among field personnel. Articles and ideas for future articles are welcome!!

Reminder: Filing Season

It's April, that time of year when tulips bloom and tax returns are due. Just a reminder that next Thursday is April 15th and for most taxpayers, your tax returns are due to the IRS. If you are an owner of IRC §42 property, there are four additional "filings" to consider.

1. If you have just completed the first year of the credit period, you can now make a final determination of costs includable in Eligible Basis. Your final cost certification should be submitted to your state housing agency according to their requirements.
2. If you have received the signed Forms 8609 from your state housing agency during the last year, and you haven't filed the Part II with the IRS, you might want to double check. Remember to complete the form completely and sign and date!
3. Your annual compliance certification to your state housing agency is probably due. Most of the agencies set filing dates soon after the end of the calendar year.
4. If, like a lot of IRC §42 project owners, you need more time to prepare you federal tax return, you can file a request for an extension of time to file.

Auditing Eligible Basis

The IRC §42 credit allowable each taxable year is *generally, and without considering all the details,* equal to:

Eligible Basis x Applicable Fraction x Applicable Percentage

Eligible Basis is a term unique to IRC §42 and has a specific definition, which is the topic of this article. In addition, basic audit issues and helpful audit techniques are discussed.

Defining Eligible Basis

Eligible Basis is, by definition, the cost of residential rental property as defined in IRC §103 that is depreciable property under IRC §168. The buildings may be:

1. New buildings, for which original use begins with the taxpayer (IRC §42(i)(4)),
2. Existing buildings, which means any building which is not a new building (IRC §42(i)(5)), and
3. Rehabilitated buildings, the expenditures connected with rehabilitating the building are treated as a separate new building and do not include the cost of acquiring the building (IRC §42(e)(1) and (2)).

IRC §263A generally requires direct costs and an allocable portion of indirect costs of real or tangible personal property produced by a taxpayer to be capitalized to the property produced. IRC §263A(g)(1) defines produce as including constructing, building, installing, manufacturing, developing, or improving. Indirect cost subject to IRC § 263A capitalization are defined in Treas. Reg. § 1.263A-1(e)(3)(i) as "…all costs other than direct material costs and direct labor costs (in the case of property produced)….Indirect costs are properly allocable to property produced…when the costs directly benefit or are incurred by reason of the performance of production…"

Qualifying Assets

Eligible Basis includes the adjusted basis of:

1. Residential rental units, as defined in Treas. Reg. §1.103(b)(8)(i). In addition, IRC §42(i)(3)(B)(iv) provides that certain single-room occupancy units also qualify as residential rental units even though such housing may provide eating, cooking and sanitation facilities on a shared basis.
2. Under IRC §42(d)(4)(B), common areas and amenities provided to all the residential units.
3. Under IRC §42(d)(4)(C), any building used to provide services for certain nontenants. A "community service facility" means any facility located in a qualified census tract (as defined in IRC §42(d)(5)(C)), designed to serve primarily individuals whose income is 60 percent or less of area median income (within the meaning of IRC §42(g)(1)(B)), and used throughout the taxable year as a community service facility.
4. Under IRC §42(c)(1)(E), the portion of the building used to provide supportive services designed to assist tenants in locating and retaining permanent housing if the taxpayer is providing transitional housing for the homeless under IRC 42(i)(3)(iii).

5. Under Treas. Reg. §1.103-8(b)(4), functionally related facilities that are subordinate to residential rental units, such as swimming pools and similar recreational facilities, parking areas, and other facilities reasonably required for the project.

6. As explained in Rev. Rul. 74-265, land preparation costs (such as landscaping) may be subject to a depreciation allowance if such costs are so closely associated with a depreciable asset so that it is possible to establish a determinable period over which the preparation will be useful. A useful life for land preparation is established if it will be replaced contemporaneously with the related depreciable asset. Whether land preparation will be replaced contemporaneously with the related depreciable asset is necessarily a question of fact, but if the replacement of the depreciable asset will require the physical destruction of the land preparation, the test is considered satisfied.

Date of Determination

For a new building, under IRC §42(d)(1), the eligible basis is its adjusted basis as of the close of the first taxable year of the credit period. Under IRC §42(d)(2), the same rule applies for acquired buildings, but additional requirements must also be met. Finally, under IRC §42(h)(3)(C), if an existing building has been rehabilitated, then the determination is made as of the close of the first taxable year in the credit period for such expenditures, but only if criteria for minimum expenditure amounts have been met.

Identification of Large, Unusual, or Questionable Items

Reconciliation of Form 8609 and Form 8609-A

The eligible basis reported on Form 8609, line 7, and on line 1 of the Form 8609-A filed with the tax return should match. Any differences should be explained by the taxpayer.

Reconciliation of Final Cost Certification

Under IRC §42(m)(2), the credit allocated by a state agency is not to exceed amount necessary to assure project feasibility and viability as a qualified low-income housing project throughout the credit period. To make sure only the credit necessary is allocated, the state agencies perform evaluations of the sources and uses of funds at three critical points of the development process, including when the building(s) are placed in service.

This final evaluation for when a building is placed in service must be made no later than the date the state agency issues the Form(s) 8609. As described in Treas. Reg. §1.42-17(a)(5), the taxpayer must submit a schedule of project costs. This schedule is commonly referred to as the final cost certification because it is to be prepared on the method of accounting used by the taxpayer for federal income tax purposes, and must detail the project's total costs as well as those costs that qualify for inclusion in eligible basis under IRC §42(d).

The final cost certification should be secured from the taxpayer, or if not available, from the state agency. The eligible basis reported on this final cost certification should be compared to the eligible basis reported on Form 8609 and Form 8609-A, and any differences reconciled.

Setting the Scope

Finally, based on the review of the final cost certification, the audit scope for examining eligible basis can be determined. Specific costs should be identified as large, usual, or questionable items. (See IRM 4.10.2.3.1.) Consider the following:

1. Inherent character of the cost. Categories of costs that by character are not includable in eligible basis can be eliminated from further consideration if the taxpayer did not include the costs in eligible basis. For example, the costs associated with the acquisition of land.

2. Beneficial effects of how an item is reported; it is to the taxpayer's advantage to include as much cost as possible in eligible basis. For example, a taxpayer may purchase land with an existing building that was then rehabilitated and now qualifies as low-income housing. In this case, there should be an allocation of the purchase price between the land and the acquired building.

3. Consider costs that should be identified in the final cost certification, but are missing. For example, costs that were most probably incurred, but are not includable in eligible basis include partnership organizational costs, rent-up and marketing costs, and syndication fees.

4. Consider line items on the cost certification that are an accumulation of a larger number of separate costs. At a minimum, the taxpayer should be asked to provide an explanation of the underlying costs.

From the analysis, it may be possible to exclude costs the taxpayer did not include in eligible basis because the cost is not, by characterization, includable. For the remaining categories identified on the cost certification, two additional criteria can be used to identify large, unusual, or questionable items for audit consideration.

1. Consider the comparative size of the cost to total eligible basis. Small dollar values for line items that appear to be includable in eligible basis by character may not need further examination.

2. Consider the absolute size of the cost, even if comparably small, if the dollar value does not appear commensurate with the character of the cost.

At this point, the analysis should identify those costs that the taxpayer has included in eligible basis which are:

1. Clearly not includable in eligible basis,

2. Allocable costs for which the method of allocation should be reviewed,

3. Costs not clearly identified in the cost certification and which may not be includable in eligible basis,

4. An accumulation of costs, for which any one of the underlying individual costs may not be includable in eligible basis,

5. Individual line items selected because of its comparative or absolute size. Generally, these costs are expected to be the hard costs of constructing new residential rental property or rehabilitating existing property.

Audit Issues

The first issue is whether the asset, by character, is residential rental property qualifying for the credit. To summarize:

1. IRC §§ 103, 168, and 263A are *the primary* references for the definition of residential rental property.

2. Under IRC §42, eligible basis includes not only the cost of residential rental units, but also includes common areas, community service facilities, supportive services for the homeless, and functionally related facilities.

3. Eligible basis *may* include the cost of some land improvements and landscaping, but is generally limited to assets so closely associated with a depreciable asset includable in eligible basis so that it is possible to establish a determinable period over which the preparation will be useful.

If assistance is needed to determine the treatment of a specific cost, a series of technical advice memorandums (TAM) issued by the IRS provide helpful explanations and citations for the controlling legal authority. See TAMs 200021509, 200021510, 200043015, 200043017, 200044004, and 2000044005. TAM 200043016 is also helpful, but the treatment of local impact fees has been updated since the TAM was released; see Rev. Rul. 2002-09 and PLR 200916007.

The second issue is verification of the cost. Development of this issue tends to taxpayer-specific, but generally includes the review of contracts, receipts, etc. Owners of IRC §42 projects are subject to the same substantiation requirements as all other taxpayers under IRC §6001 and the associated regulations.

The third issue is determining when the cost was incurred, since only those qualifying costs incurred before the end of the first year of the credit period are includable in eligible basis.

1. Notice 1988-116 explains that construction, reconstruction, or rehabilitation costs are incurred for purposes of IRC §42 on the date such expenditures would be considered incurred under an accrual method of accounting, regardless of the method of accounting used by the taxpayer incurring the costs with respect to other items of income and expense; i.e., the amount must be fixed and determinable.

2. Under IRC §42(d)(1), the eligible basis is the building's adjusted basis as of the close of the first taxable year of the ten-year credit period. Under IRC §42(f)(1), the credit period starts with the taxable year in which the building is placed in service, or at the election of the taxpayer, the succeeding taxable year. The election is documented on Form 8609, line 10a.

3. Notice 1988-116 also explains that for purposes of IRC §42, the term "placed in service" has two definitions.

   The placed-in-service date for a new or existing building used as residential rental property is the date on which the building is ready and available for its specifically assigned function.

   The placed-in-service date under IRC §42(e)(4)(A) for rehabilitation expenditures that are treated as a separate new building is the close of any 24-month period, over which the taxpayer has aggregated expenses for purposes of determining whether the minimum costs have been incurred to qualify for the credit (see IRC §42(e)(3)(A)). This calculated placed-in-service date applies even if the building is occupied during the rehabilitation period. See Newsletter #17. At this point, the taxpayer should document compliance with the requirement for the selected 24-month period to establish when the rehabilitation costs were placed in service.

4. Generally, Certificates of Occupancy issued by a local government agency after physically inspecting the buildings are used to document when a building has been placed in service. The documented placed-in-service date should match the date identified on Form 8609, line 5.

The fourth issue is whether the costs have been reasonably allocated among the assets. The following cost allocations should be reviewed.

1. The allocation of the purchase price between the land and any acquired buildings.

2. The allocation of costs between the acquisition of a building and its subsequent rehabilitation.

3. The allocation of costs between multiple low-income buildings. Consider:

   Costs for individual low-income residential rental buildings, particularly if not comparably constructed,

   Common areas and facilities not directly associated with a specific low-income building, Land improvements and landscaping, and

Indirect costs capitalized under IRC §263A.

4. Mixed low-income housing and commercial property. None of the costs associated with commercial property is includable in eligible basis.

5. The developer fee should also be allocated based on associating the services provided with an asset includable in eligible basis. Examples of services likely to be performed by the developer, which are not includable in eligible basis include (*but are not limited to):*

   Securing undeveloped land,
   Forming the partnership or syndicating the partnership to investors,, and
   Securing the credit allocation.

Conclusion

In this article, the fundamental definition of Eligible Basis has been discussed and specific audit issues identified. Basically, examiners should determine whether costs are includable in Eligible Basis based on character, dollar value, when incurred, and reasonableness of allocations. Once the dollar value of Eligible Basis associated with each building is verified, other tests and requirements can be considered.

Multiple Allocations of Credit

Last September, the IRS released an updated Guide for Completing Form 8823 ("Guide"). One of the new issues we addressed is the treatment of households who were initially income-qualified and then continue to reside in the low-income unit after the end of the 15-year compliance period. As explained in the Guide, page 4-27, concurrent to qualifying the unit for IRC §42 purposes, the household also qualifies the unit for purposes of the +30-year extended use agreement, even after the end of the 15-year compliance period, based on the initial income certification at move in.

The second issue is the treatment of originally income-qualified households if, after the end of the 15-year credit period, the buildings receive a second allocation of credit. Basically, any household determined to be income qualified at the time of move-in for purpose of the extended use agreement is a qualified low-income household for any subsequent allocation of IRC §42 credit.

The Guide provides two examples. The first example considered the allocation of additional credit to the *same* owner who received the first allocation.

> An owner received IRC §42 credits to construct new low-income housing. The owner placed the buildings in service in 1991 and started claiming credits the same year. The 15-year compliance period ended December 31, 2005. In 2007, the owner applied for and received an allocation of credit to rehabilitate the existing low-income buildings. The rehabilitation is completed and the owner starts claiming the credit in 2009.
>
> On February 1, 2004, John and Mary are determined to be income-qualified and move into a low-income unit project. John and Mary timely complete their income recertification each year 2005 through 2008. The unit has always qualified as a low-income unit, except when the unit was not suitable for occupancy during the rehabilitation period.
>
> The unit is a low-income unit on January 1, 2009, when the owner (a calendar year taxpayer) begins claiming the credit. If the unit was determined to be an over-income unit under IRC §42(g)(2)(D) at the time of the household's last income recertification in January of 2008, then the owner is subject to the Available Unit Rule.
>
> NOTE: Similarly, vacant units previously occupied by income-qualified households continue to qualify as low-income units if the units are suitable for occupancy. However, the owner is subject to the Vacant Unit Rule.

The second example addresses the situation where a new owner acquires and rehabilitates the low-income buildings. How is a "new" owner identified? If the owner qualified for the acquisition credit, then the owner is a *new* owner. Here's the example:

> Owner ABC received IRC §42 credits to construct new low-income housing. ABC placed the buildings in service in 1991 and started claiming credits the same year. The 15-year compliance period ended December 31, 2005. In 2006, ABC sold the project to XYZ, who simultaneously received an allocation of acquisition and rehabilitation credit. The rehabilitation was completed and XYZ started claiming the credit in 2008. From the time of acquisition until a new extended use agreement is recorded, XYZ is subject to the extended use agreement between ABC and the state agency.
>
> On February 1, 2004, John and Mary are determined to be income-qualified and move into a low-income unit project. John and Mary timely complete their income recertification each year 2005 through 2007. The unit has always qualified as a low-income unit, except when the unit was not suitable for occupancy during the rehabilitation period.
>
> Based on the 2007 annual income recertification, the unit is a low-income unit at the beginning of XYZ's credit period on January 1, 2008, when XYZ (a calendar year taxpayer) begins claiming the credit. XYZ should follow the procedures under Rev. Proc. 2003-82 to test income at the beginning of the credit period as described above.
>
> NOTE: Vacant units previously occupied by income-qualified households are not low-income units on January 1, 2008. The owner must apply IRC §42(f)(2).

So, to summarize:

1. In either case, originally income-qualified households are protected by the extended use agreement and qualify as low-income households for purposes of the second allocation.

2. The Available Unit Rule (AUR) is applied differently.

    a. For a second credit allocation to the same owner, the AUR is applied based on the household's last annual income recertification.

    b. For a new owner, income is tested at the beginning of the credit period and the AUR applied accordingly. However, the household is not required to complete a new income (re)certification within 120 days of the acquisition; the existing certification is fine.

3. Vacant units are also treated differently.

    a. For a second credit allocation to the same owner, vacant low-income units continue to qualify as low-income units if the units are suitable for occupancy.

    b. For a second allocation to a new owner, units previously occupied by income-qualified households, but are vacant at the beginning of the 10-year credit period are *not* low-income units.

Form 8823: New Revision Released

A new revision of Form 8823, Low-Income Housing Credit Agencies Report of Noncompliance or Building Disposition, was released in November 2009. State agencies monitor IRC §42 projects throughout the 15-year compliance period and when noncompliance is identified or the state agency becomes aware of a building disposition, this form is filed to report the event to the IRS.

Only one minor change was made to the form itself. Line 11p has been revised to read, "*Building* is no longer in compliance……" rather than "Project is no longer in compliance…" It's just a minor change in the description, but needed because noncompliance is reported on a building basis. A low-income project can consist of more than one low-income building and it is possible that only one low-income building in a multi-building project needs to be reported as no longer participating in the program.

Changes were also made to the instructions for completing the form.

1. For line 11c, Violations of the UPCS or local inspection standards, the website address where you can find the Dictionary of Deficiency Definitions has been update to **www.hud.gov/reac** under Library, Physical Inspection, Training Materials.

2. For line 11e, Changes in Eligible Basis or the Applicable Fraction, the instructions now reflect an amendment made to IRC §42(d)(5)(A) as part of the Housing and Economic Recovery Act of 2008, regarding the treatment of federal grants. For buildings placed in service before July 31, 2008, state agencies report any federal grant made with respect to any building or the operation thereof during any tax year in the 15-year compliance period. For buildings placed in service after July 30, 2008, state agencies report any federal grant used to finance any eligible basis costs of any project. However, IRC §42(i)(9)(B), provides that the basis of a qualified building shall not be reduced by the amount of any grant described in IRC §42(i)(A) See Notice 2010-18 for complete discussion.

    The instructions also include a change in the treatment of below market federal loans. For buildings placed in service before July 31, 2008, state agencies will need to report and below market rate federal loan that is or was used (directly or indirectly) with respect to the building or its operation during the compliance period and which was not taken into account when determining eligible basis at the close of the first year of the credit period. For buildings placed in service after July 30, 2008, below market rate federal loans are no longer considered federal subsidies.

3. The instructions for line 11h, Project not available to the general public, now include a reference to IRC §42(i)(9) which clarifies that a qualified low-income project does not fail to meet the general public use requirement solely because of occupancy restrictions or preferences that favor tenants (1) with special needs, (2) who are members of a specified group under a Federal program or State program or policy that supports housing for such a specified group, or (3) who are involved in artistic or literary activities.

And last of all, the average estimated time for recordkeeping has been updated from 7 hours and 39 minutes to 11 hours and 43 minutes; that's an increase of 4 hours and 4 minutes.

Nit Picking Time

Nit #1: Chapter 4 of the Guide includes a new footnote #40, relating to completing income certifications for existing tenants-in-place before acquiring an existing building. It reads,

> "...if the new owner has access to the property before the acquisition date, tenant income certifications may be completed before the acquisition using the current income limits. The effective date is the date of acquisition."

So, how far in advance of the acquisition can a new owner complete income certifications? No time limit is stated, but for practical purposes, the limit is 120 days since the income certification's effective date is the acquisition date and the substantiation and documentation can be no older than 120 days.

Nit #2: Define "project." The term has a specific definition under IRC §42, and generally, each low-income building is considered a separate low-income project (see IRC §42(g)(3)(D).) However, a taxpayer may elect to include low-income buildings as part of a multiple-building project (see IRC §42(h)(1)(F)(ii)) but only if the low-income buildings meet specific criteria. The election is identified as part of the owner's first year certification, on line 8b of Form 8609, and by attaching the statement described in the instructions for line 8b. See the instructions for Form 8609, line 8b, for more information. There are two nits to pick:

First, IRC §42 requirements are applied at either the building or the project level. So knowing each building's designation, as well as how the rules are applied, is critical to the long-term success of the project. Keep in mind that no matter how an owner elects to define the "projects," the building-based rules are still applied at the building level.

Second, "project" has a precise meaning within IRC §42 and should be used precisely when discussing IRC §42 issues, which can pose interesting dilemmas. What if an owner of 10 low-income buildings actually designates two 5-building projects? What if the project designations are unknown? As a practical matter, terms such as "property" and "development" have crept into the vernacular, but a "property" or "development" is not necessarily "the project" under IRC §42.

Nit #3: What's the difference between a "tax" year and a "calendar" year? And why is the distinction important?

A "calendar" year is the 12-month time period beginning on January 1st and ending on December 31st for a given year. A "tax" year is also (generally) a 12-month time period and (generally) "tax" years match calendar years, but not necessarily so. "Tax" years may coincide with a taxpayer's business cycle (for example, July 1st to June 30th) and may be less than 12 months (short years); e.g., the first or last year of operation.

The distinction is particularly important because IRC §42 rules are based on both "calendar" and "tax" years. For example, the Applicable Fraction is determined as of the end of the *tax* year, but a taxpayer must review utility allowances at least once during each *calendar* year. In one instance, "calendar" and "tax" years are combined! A full-time student is defined (in part) as an individual, who during each of 5 calendar months during the *calendar* year in which the *taxable* year of the taxpayer begins. And the five calendar months need not be consecutive.

The cautionary note is that while almost all owners of IRC §42 projects are taxpayers with "tax" years that are "calendar" years…it isn't always so.

Nit #4: When "generally" is included in an explanation it means: (1) there is at least one exception to the rule (which is, hopefully, also explained), or (2) the writer is unwilling to conclude, without equivocation, that there are no exceptions.

Administrative Reminders

Expanding Audits, Project/Tracking Code: All LIHC cases should include Project Code 0670 and ERCS Tracking Code 9812. If the audit is expanded to include additional years or related taxpayers, the additional returns should also carry the LIHC project code and tracking code designation.

Form 5344, Revenue Protection: The Examination Closing Record, Form 5344, requires entries if you are reducing the amount of credit to be carried forward to a tax year you are not going to audit. Enter the amount of credit carryforward to be disallowed for Item 46. Code "L" should be entered for Item 47. See IRM 4.4.12.4.58 for an example.

Surveying LIHC Tax Returns: If you believe it is appropriate to survey an LIHC return, please fax Form 1900 to Grace Robertson, at 202-283-7008, for signature approval.

TEFRA Requirements: As LIHC property owners are almost always partnerships, and are likely to be subject to TEFRA procedural requirements, please remember to document actions taken and decisions made by completing:

Form 12813, TEFRA Procedures
Form 13814, TEFRA Linkage Package Checksheet
Form 13828, Tax Matters Partner (TMP) Qualification Checksheet
Form 13827, Tax Matters Partner (TMP) Designation Checksheet

More information is available on the TEFRA website, along with a list of TEFRA Coordinators who can help walk you through the procedures.

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♫Grace Notes♫

I have a theory. I call it the "Theory of Random Inconvenience" and I think it explains the bothersome little distractions we encounter. I emphasize the "randomness" of these events because, although there must be a cause (another theory), there is no intent to annoy. Things just happen…minor occurrences that if you added them all up, don't fill a bucket labeled iota! I'm most aware of these uncomfortable inconveniences when I

travel and perhaps two examples from a recent trip will help explain.
Dulles Airport just completed a new underground rail system between most of the terminals. As I went through security, the guard notes my gate and comments that while most passengers can now use the subway, I will need to use the above-ground bus. "Sorry," he says, "for the inconvenience." Not a problem….I've been on the bus countless times and one more time isn't going to make one bit of difference. As we ride along, I'm looking forward to a cup of hot chocolate and a scone from the little bakery conveniently located right where I'll be getting off, and reminding myself to buy a book at the bookstore conveniently located next door, before walking down the corridor to my gate. So, I get off the bus to find that my gate is right there! How convenient! But when I turn around to buy my hot chocolate and scone, I find that the bakery is boarded up! There's a note directing me way down the corridor to their new location right by the exit for the new subway. It's too far away and I don't have time anyway. How inconvenient for me, I thought, as I purchased a cellophane-wrapped sandwich.

Then, it's not a long flight and I arrive at my destination in the mid-afternoon. The shuttle ride to the hotel is equally uneventful and I check in with only a minor paperwork problem. I get to my room and find that it is near the elevators rather than at the far end of the hall. How convenient…except, the last night of my trip, when guests were reveling a little too loudly in the hallway while walking to their rooms (at the far end of the hall of course) at 2 in the morning. How inconvenient, I thought, as I tugs my blankets around me and went back to sleep.

I also have two corollaries. First, random inconvenience should not be confused nits that need to be picked. Inconvenience may make you uncomfortable, but there's no point obsessing about it. Nits, on the other hand, are the tediously little details of our lives that, like bugs that bite you, have consequence.

My second corollary is best explained by another example from the same trip. On my flight home, I found myself seated at the back of a fully-booked flight. Getting on went smoothly, since I was in one of the first groups on board. Conversely, I was one of the last to get off and by then everyone was getting a bit impatient as, row-by-row, passengers ahead of us grabbed their bags from under their seats and pulled suitcases down from the overhead, and then moved slowly up the aisle.

Being almost height-challenged, I was on my toes reaching up a bit awkwardly for my own bag, when a man put down his own luggage and simply reached above my head and grabbed it for me. "Thanks," I said as he turned away. My point? Acts of kindness may be inconvenient, but they are never random.

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