

**Public Comment Related to Section 42, Low-Income Housing Credit Average Income Test Regulations (REG-119890-18)**

**Posted: 12/28/2020**

**ID: IRS-2020-0038-0044**

**Submitter Name: John Mackey**

I am in agreement with the comments made by the National Housing and Rehabilitation Association. The income averaging provisions make it easier to address workforce housing issues in a community but the way the regulations are drafted, the risk of losing the tax credits is too high to enable that this approach be used.