



*Housing Trust Fund
Allocation Plan
2017*



I. ALLOCATION PLAN REQUIREMENTS

The Municipality of Anchorage (MOA) is responsible for distributing HTF funds throughout Anchorage according to its housing priority needs.

Distribution of HTF funds

- 1. The MOA will distribute its HTF funds (§91.220(l)(5)) by applications submitted by eligible recipients that meet the MOA's priority housing needs.**
- 2. The MOA will distribute all HTF funds by selecting applications submitted by eligible recipients.**
 - a. Description of the eligibility requirements for recipients of HTF funds (as defined in 24 CFR §93.2).**

Applicants for National Housing Trust Fund (HTF) awards are required to demonstrate familiarity with the requirements of other Federal, State or local housing programs that may be used in conjunction with the HTF to ensure compliance with all applicable requirements and regulations of such programs.

The review of applicant eligibility for HTF awards will take place at the initial qualification stage in the application process and will be verified again at the final application stage.

MOA's review of applicant eligibility requires that the experience with other Federal, State and local programs be within the past 10 years.

Any substitution or change in partners or contract staff used to satisfy the experience requirements requires MOA's approval, in advance and in writing.

The specific provisions of 24 CFR 93.2 detailed in the definition of recipient listed below apply to the allocation plan and will be explicitly stated as requirements in the application instructions.

Recipient means an organization, agency, or other entity (including a public housing agency, or a for-profit entity or a nonprofit entity) that receives HTF assistance from a grantee as an owner or developer to carry out an HTF-assisted project. A recipient must:

- (1) Make acceptable assurances to the grantee that it will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities;**
- (2) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity;**
- (3) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs; and**
- (4) Have demonstrated experience and capacity to conduct an eligible HTF activity as evidenced by its ability to own, construct, or rehabilitate, and manage and operate**

an affordable multifamily rental housing development.

b. Description of the MOA's application requirements for eligible recipients to apply for HTF funds.

An eligible recipient of HTF funds will be required to comply with uniform administrative requirements in 2 CFR Part 200 and 24 CFR Part 93. The MOA will only award HTF funds for rental housing and/or operating cost assistance for rental housing.

APPLICATION REQUIREMENTS – All required items are **threshold items**.

(1) Application - General

One complete application package with original signatures and three (3) additional copies must be submitted hard copy by the due date/time to:

Municipality of Anchorage
Department of Health and Human Services
Housing and Community Services Division
Community Safety and Development (CSD)
825 L Street, Room 506
Anchorage, AK 99501
Mail: P.O. Box 196650
Anchorage, Alaska 99519-6650

- Application should be arranged in the order listed in the application checklist and must include each of the items listed on the application checklist.
- Include one (1) complete application package with original signatures and three (3) additional copies, all bound in three-ring binders.
- All application material should be bound in the order in which they are identified.
- Application must be organized using a cover page and a table of contents.
- Application must include numbered tabs, placed between the application and each threshold and supporting application material item.
- Application must be on 8½ x 11 inch paper. Maps on larger size paper must be folded to an 8½ x 11 size and attach to the back of the proposal.
- Application must include a thumb drive containing the complete proposal in MS Word and the application pro-forma in Excel.

No funds, HTF, Municipal or other, may be committed to a project for which the applicant has applied before the environmental review according to 24 CFR Part 93.301 and CPD Notice 16-14 is complete by MOA. Options to purchase a site executed prior to completion of the environmental review must comply with the NSP Policy Alert dated September 16, 2011. All buy/sell agreements must be reviewed and approved by Municipal staff. **If the project has begun prior to the submitted Application, the project MUST STOP ALL WORK and no further expenditures are incurred until the Application process has been completed which includes the environmental review.** All funding awards, contracts or agreements made by MOA are conditional upon successful completion of the environmental review and receipt from HUD of a Release of Funds. The environmental review process takes at least 45 days from the date all

supporting documentation is complete.

Provide a signed letter of transmittal (A brief letter signed by a corporate officer or other individual who has the authority to bind the firm that includes a brief statement of your firm's understanding of the services to be performed, AND the name(s) of the person(s) who are authorized to make representations for your firm, their titles, address, and telephone numbers.

The Application must be complete with all questions answered, all schedules completed, and all required narratives included. An application which, in MOA's sole opinion, has not met the required submissions, will be considered non-responsive, and may NOT be considered further in this Notice of Funding Availability cycle. MOA reserves the right to request technical corrections to the application.

(2) Signed Certifications

Applicant must certify that housing units assisted with HTF funds will comply with HTF requirements.

Applicant must provide Debarment Certification www.sam.gov

(3) Project Description

Provide a detailed project description including a description of the eligible activities to be conducted with HTF funds.

Describe ongoing services that will be provided, if any.

If project includes rehabilitation, are any new housing-units created?

Describe how the project is related to the Market Study.

Summarize the development milestones made to date.

Describe the challenges to the project development that have been encountered so far and if they have they been overcome. If so, how?

Summarize major development milestones that need to be accomplished prior to expending funds.

What foreseeable obstacles may prevent you from expending the funds in a timely manner?

Describe how this HTF project will be administered in a manner that provides housing that is suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d–2000d–4), the Fair Housing Act (42 U.S.C. 3601 *et seq.*, E.O. 11063, 3 CFR, 1959–1963 Comp., p. 652) and HUD regulations issued pursuant thereto; and promotes greater choice of housing opportunities.

For new construction of rental housing or new rental housing using Project Based Vouchers (PBV), in carrying out the site and neighborhood requirements with respect to new construction of rental housing, provide narrative on how the proposed site for new construction meets the requirements in 24 CFR 983.57(e)(2).

(4) Project Timeline

Provide assurances that construction can reasonably be expected to start within 12 months of the agreement date with the MOA.

MOA and the successful applicant(s) must have an executed agreement by March 2, 2019 for 2016 HTF funds and October 31, 2019 for 2017 HTF funds.

All 2016 HTF funds must be expended by March 2, 2022 and 2017 HTF funds must be expended by October 31, 2022.

Projects must have initial disbursement of funds within 12 months after setup in the HUD IDIS database.

Remaining HTF funds will be reduced or recaptured.

(5) Acceptable Assurances

Provide acceptable assurances that applicant will comply with the requirements of the HTF program during the entire period that begins upon selection of the recipient to receive HTF funds, and ending upon the conclusion of all HTF-funded activities at the end of the 30-year affordability period. Provide a schedule of actions for carrying out the activities, consisting of schedules, timetables, and milestones. Provide a management plan that assigns responsibilities which in MOA's opinion adequately demonstrates the ability of the applicant to manage the proposed project.

(6) Financial Capacity

Demonstrate the ability and financial capacity of applicant to undertake, comply, and manage the eligible activity.

(7) Financial Statements

Non-Profit Organizations: Most recent audited or unaudited financial statements.

(8) Project Financial Feasibility

Provide evidence demonstrating the financial feasibility of the proposed project. Both development feasibility (i.e., sources of development funds equal development costs) and operational feasibility (project revenue + other operating subsidies, if any, exceed in an acceptable amount the projects operating expenses and debt service requirements) must be evident.

All applicable worksheets in the workbook must be completed.

Customized workbooks of the application and/or unapproved (by MOA) modifications to the MOA workbook will not be accepted.

Minimally, this evidence should include:

- i. Provide credible third party detailed scope write-ups in accordance with 2 CFR 200, detailed cost estimates and narratives. The MOA must review and approve all scope write-ups and written cost estimates. If rehabilitation is proposed, a comprehensive property-inspection report in accordance with 24 CFR 93.301 to include health and safety; major systems; lead-based paint; accessibility; disaster mitigation; State and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; capital needs assessments; and broadband infrastructure. Provide

acceptable assurances using cash-flow analysis and narratives that applicant has adequate cash-flow for the duration of the project development period.

- ii. Data which supports estimated project-revenue (rent levels), vacancy rates, operating expenses, and debt carrying capability. If the proposal is an expansion of a prior development phase owned and/or operated by the sponsor (or related party), operating expense data (audited if available, unaudited if no audited financial area available) for the earlier and/or adjacent development(s) should be provided in the application.
- iii. Support for the reliability of other proposed project funding sources have been confirmed, i.e. letters of funding commitment, preliminary loan-review, evidence of application for other funding sources, etc.
- iv. If applying for low-income housing tax-credits (LIHTCs), applicants must provide letters of interest from potential investors in their projects. These letters of interest must identify the following:
 - The amount of credit the investor is willing to purchase for the applicant's project;
 - The price-per-credit the investor anticipates offering for credits awarded to the project;
 - For the purpose of the subsidy layer review process, the credit price used by MOA to size the LIHTC award will not exceed the highest credit price documented by the letters of interest; and
 - MOA reserves the right to use the documented credit price it determines most reasonable for the proposal, or averages of the documented credit prices, during the subsidy layer review process.
- v. Reasonable assurances that the project can be successfully implemented within the proposed time frame.

(9) Other Funding

Provide documentation that all funding sources have been confirmed and/or substantiated by written documentation. Written documentation may include award letters, offer letters, final term sheets, or other commitments which are conditioned upon receipt of the HTF funds. LIHTC applicants must have received a reservation from the Housing Credit Allocator and be able to provide a good faith offer of equity investment from an investor.

(10) Program income

Program income is to be remitted to Alaska Housing Finance Corporation.

(11) Market Analysis

All project proposals must have a completed and comprehensive Market Analysis documenting the demand and need for the proposed units. The analysis must include an assessment of the current market demand in the neighborhood in which the project will be located, the experience of the applicant, the financial capacity of the applicant, and firm written financial commitments for the

project.

At the minimum, the analysis shall address the following issues.

- i. Evaluate general demographic, economic, and housing conditions in the community.
- ii. Delineate the market area by identifying the geographic area from which the majority of a project's tenants are likely to come.
- iii. Quantify the pool of eligible tenants in terms of household size, age, income, and other relevant factors.
- iv. Analyze the competition by evaluating other housing opportunities with an emphasis on other affordable rental developments opportunities in the market area.
- v. Assess the market for the planned units and determine if there is sufficient demand to rent the HTF-assisted housing within 18 months of construction completion.
- vi. Evaluate the effective demand and the capture rate, usually expressed as a percentage (the project's units divided by the applicant pool). The capture rate is the percentage of likely eligible and interested households living nearby who will rent the units in the proposed project in order to fully occupy it.
- vii. Estimate the absorption period. Plan how many units can be successfully leased each month and how long it will take to achieve initial occupancy of the HTF units and stabilized occupancy for the project as a whole.

Independent or third-party studies are acceptable if they meet the standards above. Independent or third-party studies are not required, or may not be practical or cost effective for smaller projects. Program criteria may make simplified or in-house market assessment more appropriate. Assessments for projects serving special needs can often be completed using primary data from service providers whose existing client base will form the primary pool of potential tenants.

It is allowable in small projects, 1-4 units, with specifically targeted clients in a pre-approved pool, for the applicant to describe its marketing procedures. The description must ensure all units will be rented within 18 months of the completion of construction.

(12) Units

- i. For all projects with 5 or more units provide documentation that a minimum of 5% of the total unit count (fractional units rounded up), specifically equipped for persons with physical disabilities. All projects with 5 or more units must provide a minimum of 2% of the total unit count (fractional units rounded up), equipped for persons with sensory impairments. Separate units must satisfy these threshold conditions. Consequently, in a six-unit project at least one unit will need to be equipped for physical disabilities and a separate unit will also need to be equipped for persons with sensory impairments.
- ii. Provide documentation that all units will be constructed or rehabilitated to the applicable standard as required by the specific program under which funds are

requested and must meet the requirements of the funding program and any of the following applicable laws:

1. Americans with Disabilities Act
 2. U.S. Fair Housing Amendments Act of 1989
 3. Alaska Statute AS 18.80.240
 4. Local Government Ordinances
 5. HTF assisted projects that are rehabilitated must comply with the rehabilitation standards noted for the HOME Investment Partnership program.
- iii. Provide documentation that the project will exclusively use certified Energy Star appliances.
 - iv. Provide documentation that all medicine cabinets in the project must include locking mechanisms.
 - v. For projects with units accessible through common hallways provide documentation that units will have secured entryways.
 - vi. Provide documentation that all projects targeting families with children must have a recreation area on-site for children which is designed and equipped with age appropriate equipment. The play area and its associated access route(s) must be compliant with the Americans with Disabilities Act.

(13) Capital Needs Assessment

Provide a Capital Needs Assessment for all new construction and/or rehabilitation projects. Provide an assessment of the long-term physical needs of the project including all capital assets. In undertaking a Capital Needs Assessment, first identify the useful life of each asset. Then, calculate the payment stream necessary to replace each asset using the time-value of money. The applicant must insure the useful life of the project will exceed the compliance period for the project.

(14) Familiarity

Demonstrate applicant familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HTF funds to ensure compliance with all applicable requirements and regulations of such programs.

(15) Experience and Capacity

The Applicant shall have under contract all team members (A&E, attorneys, general contractor, etc.) necessary to undertake the project prior to submitting the application. Provide information demonstrating experience and capacity of applicant to conduct an eligible HTF activity as evidenced by its ability to own, construct or rehabilitate, manage, and operate an affordable multifamily rental housing development.

Provide company history for the development entity and property management entity. Resumes for the following will be required to determine whether or not the property management firm passes the experience threshold.

Resumes Required for:

- i. Property Management firm’s key staff
- ii. Programmatic operations team participants

Provide a list of all projects which have been developed in the State of Alaska by the applicant or developer. Include location, # of units, year developed and project status. Provide a brief narrative statement describing the experience the development team has in developing similar projects. Address both the organizational experience and the experience of specific individuals who will be involved in this project.

Provide a summary of the property management plan and the team’s experience in managing similar projects. Indicate if team members are paid staff, hired consultants, or volunteers.

Provide a list of any other similar projects that are or will be ongoing during the timeframe of this project. Demonstrate how both projects can be undertaken with current resources.

Describe any past monitoring findings and their resolutions.

(16) Debarment

Provide printouts from www.sam.gov for the applicant and all team members of the applicant. Printouts must be provided for all contractors and sub-contractors.

(17) Legal Organizational Status

Provide evidence of legal organizational status, i.e., non-profit designation letter from the Internal Revenue Service (non-profits and municipalities) or authorizing legislation (Regional Housing Authorities).

(18) Site Control

Provide evidence of site control for non-acquisition projects at the time of application for funding, and that site control is maintained until the environmental review, including all required public comment periods, is completed.

Applicants for HTF funds must provide evidence of site control that is consistent with Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Specifically, the site control for a HTF funded project must evidence the appropriate notices regarding voluntary sale terms and the fair market value of the property being sold.

(19) Displacement and Relocation Assistance Plan

Provide an Anti-Displacement and Relocation Assistance Plan for all applications which propose to undertake an activity which will involve acquisition or rehabilitation of a property occupied by a “person” other than the owner of that property (i.e., tenant, [including an individual, business or non-profit organization]). Provide copies of all tenant notifications, evidence of tenant notification (such as return receipt or other signature of delivery and receipt by tenant) and copy of tenant roll (as applicable).

(20) Affirmative Marketing Plan

Provide a copy of the affirmative marketing plan for the project. Applicant will be

required to adopt and follow the affirmative marketing procedures and requirements. The Affirmative Marketing Plan shall include the following:

- i. Methods for informing the public, owners, and potential tenants about Federal fair housing laws and the grantee's affirmative marketing policy (e.g., the use of the Equal Housing Opportunity logotype or slogan in press releases and solicitations for owners, and written communication to fair housing and other groups);
- ii. Requirements and practices the grantee and owner must adhere to in order to carry out the Applicant's affirmative marketing procedures and requirements (e.g., use of commercial media, use of community contacts, use of the Equal Housing Opportunity logo- type or slogan, and display of fair housing poster);
- iii. Procedures to be used by the Applicant to inform and solicit applications from persons in the housing market area who are not likely to apply for the rental housing without special outreach (e.g., through the use of community organizations, places of worship, employment centers, fair housing groups, or housing counseling agencies);
- iv. Records that will be kept describing actions taken by the applicant to affirmatively market rental housing units and records to assess the results of these actions; and
- v. The MOA will annually assess the success of affirmative marketing actions of the applicant and take corrective actions where affirmative marketing requirements are not met up to and including payback.

(21) Utilities

If any utilities other than telephone will be paid directly by the tenant, attach the utility allowance you will use to determine the amount of rent the tenant will pay and list all tenant paid utilities.

c. Description of the selection criteria that the MOA will use to select applications submitted by eligible recipients.

The MOA will score the applications that meet the requirements in b above.

Scoring the Evaluation Criteria

Below are the methodologies utilized in scoring the criteria. If a criterion is not discussed, then it will receive either all or none of the points available.

Some criteria will be scored using a mathematical formula. For example, under Project Description, the first criterion is "Target Clientele - percent of project 30% or less". This will be a straight mathematical formula where the number of households at 30% or less than the median income is divided by the total number of households. The product will be multiplied by the total points available. This methodology will be used for the following criteria.

- Project Description, Target Clientele - percent of project 30% or less
- Project Review, Percentage of Sources Committed

- Leverage, Percent to HTF funds

Other criteria are subjectively scored. Each evaluator will employ a rating scale of 0 to 100% by 10% increments, to which the total available points will be multiplied and carried to 2 decimal points. For example, under Organizational Capacity, the Development Team has a total available score of 10 points. If a reviewer rated the criterion as earning 90%, the points earned would be $.9 \times 10 = 9$ points. The following criteria will be subjectively scored.

- Market Assessment of the Demand in the Neighborhood
- Project Description, Supporting Housing Services
- Organizational Capacity, Development Team
- Organizational Capacity, Similar Completed Projects
- Organizational Capacity, Project Management Team
- Organizational Capacity, Property Management Team
- Organizational Capacity, Organizational Financial Capacity
- Project Review, (All)

Lastly, Leverage criterion will compare the amount of HTF leverage (as determined by Municipal staff) among the proposals. The proposal offering the most leverage will receive the full 10 points. The proposal with the next highest amount of leverage will receive 8 points, and so on.

Evaluation Summary

Criteria	Sub-Criteria	Available
Project Type - Select 1, 5 Pt. Max	New Construction/Rehab - Creating New Units	5
	Rehabilitation of Existing Units	1
Project Description - 15 Pt. Max	Target Clientele - percent of project 30% or less	5
	Target Tenants - homeless or at-risk families	3
	Supported by Market Assessment	2
	Project based rental assistance (percent of units)	5
Unit Info. - 10 Pt. Max	Units with bedrooms (1 or more)	1
	Furnished	1
	In Unit Kitchen Design	1
	In Unit Laundry	1

	Accessibility Beyond Required	1
	Comparability to Market Units	1
	Broadband/WiFi	1
	Nonresidential Amenities	1
	Parking Includes Accessibility to Block-Heater Plugs	1
	Cable Paid by Landlord	1
Market Assessment - 10 Pt. Max	Strength of rental market in neighborhood	5
	Location of units	5
Organizational Capacity - 25 Pt. Max	Development Team	10
	Similar Completed Projects	3
	Project Management Team	5
	Property Management Team	5
	Organizational Financial Capacity	2
	Similar Ongoing Projects	-3
	Monitoring Findings In Past 5 Years	-3
Project Timeline - 10 Pt. Max		10
Project Review - 55 Pt. Max	Construction/Rehab costs	10
	Development cash flow	10
	Development costs	5
	Sources	5
	Replacement schedule	5
	Income and expense	5
	Rent-up reserves	5
	Cash flow	10
	HTF funds percentage of project	5
Leverage - 10 Pt. Max	Percent of non-federal funding sources	10
Relocation - No Tenants Within Last 9 Months 10 Pt. Max		10
Total Points		150

d. Description of the MOA's required priority for funding based on geographic diversity (as defined in the consolidated plan).

The MOA has designated the entire city as the target area. This allows low-income households to live in any neighborhood and still be eligible to receive assistance from programs based on income. The MOA will not prioritize the allocating of investments geographically as there is a great need for all programs citywide. To do so would prohibit individuals or families from participation in housing or programs based on where they reside.

e. Description of the MOA's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

The largest amount of points available are for organizational capacity (25 points) and project review (55 points). There are also 10 points available based on the project timeline. These three items will be used to determine the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Description of the MOA's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families.

HTF funds will be made available through a special RFP. Proposals using HTF funds with project based rental assistance will receive scoring priority over proposals using HTF funds that do not include project based rental assistance.

g. Description of the MOA's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

The MOA does not have any priorities for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Description of the MOA's required priority for funding based on the merits of the application in meeting the priority housing needs of the MOA (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

The merits of the application in meeting the MOA's priority housing needs are rental housing projects that:

- (i) Creation of new units, either new construction or rehabilitation;
- (ii) Have units that provide better amenities;
- (iii) Target clientele whose income does not exceed 30% of the area median income, adjusted for family size;
- (iv) Target tenants that are homeless or at-risk families.

i. Description of the MOA's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

The MOA has allocated 10 points for projects that use non-federal funds.

3. The MOA's application requires the applicant to include a description of the eligible activities to be conducted with HTF funds.

4. The MOA’s application requires that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements.

5. Performance Goals and Benchmarks- §91.220(I)(5)(C)

The MOA has met the requirement to provide for performance goals and benchmarks against which the MOA will measure its progress, consistent with the MOA's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

6. Maximum Per-unit Development Subsidy Amount- §91.220(I)(5) and §93.300(a)

Enter or attach the MOA’s maximum per-unit development subsidy limits for housing assisted with HTF funds.

The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the MOA will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME’s maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The following was provided to the MOA by the local HUD CPD office. The current (calculated from Section 234 basic limits published May 2017), Anchorage maximum per unit subsidy limits for HOME program:

- 0 Bedrooms \$141,088
- 1 Bedroom \$161,738
- 2 Bedrooms \$196,672
- 3 Bedrooms \$254,431
- 4+ Bedrooms \$279,285

7. Rehabilitation Standards - §91.220(I)(5)(D) and §93.301(b)

The MOA must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The MOA’s description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. At a minimum, the rehabilitation standards must address:

- (i) Health and safety;
- (ii) Major systems;
- (iii) Lead-Based Paint;
- (iv) Accessibility;
- (v) Disaster mitigation;
- (vi) State and local codes, ordinances, and zoning requirements;

- (vii) Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing; and
- (viii) Capital Needs Assessments (if applicable).

See attached the MOA’s rehabilitation standards.

8. Resale or Recapture Guidelines- §91.220(l)(5)(E) and §93.304(f)

The MOA will not use HTF funds to assist first-time homebuyers.

9. HTF Affordable Homeownership Limits- §91.220(l)(5)(F) and §93.305

The MOA will not use HTF funds to assist first-time homebuyers.

10. MOA Limited Beneficiaries or Preferences- §91.220(l)(5)(G)

Describe how the MOA will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the MOA will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A”.

Any limitation or preference must not violate nondiscrimination requirements in §93.350, and the MOA must not limit or give preferences to students. The MOA may permit rental housing owners to limit tenants or give a preference in accordance with §93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

11. Refinancing of Existing Debt- §91.220(l)(5)(H) and §93.201(b)

The MOA will not refinance existing debt.