



## Multifamily Programs 2025 Questions & Answers

*Last Updated: July 30, 2024*

**Question #1** The 2025-2026 Multifamily Guidelines now have extended deadlines for technical submission and closing. Do those revised timelines also apply to previously funded projects?

*KHC Response* *No, the new technical submission and closing deadlines apply to projects with applications submitted after March 15, 2024. Applicants must adhere to the dates noted in their award letter for any deadlines up to and including the closing deadline. However, the revised deadlines for the submission of the construction completion/placed-in-service stage and the 8609/LURA stage will apply to all funded projects.*

**Question #2** Does KHC intend to continue using the "USDA Rural Eligibility Map" to determine if a site is considered "Rural" or "Urban" for determining the Housing Credit per-unit limit, or will all sites within the "Balance of State" pool will now be considered "Rural?"

*KHC Response* *For all applications submitted under the 2025-2026 Qualified Allocation Plan (QAP), KHC will only consider the following counties as urban: Boone, Campbell, Fayette, Jefferson, and Kenton. All other counties will be considered as rural, including for the purposes of determining the Housing Credit per-unit limit.*

**Question #3** The 2025-2026 QAP and scoring provide incentives for projects with commitments of other below-market funding sources, including those from agencies like the Federal Home Loan Bank (FHLB). However, if we apply for FHLB funds this year, we won't know if we have been awarded until November. Can we include those FHLB funds that we are applying for and receive points for them?

*KHC Response* *On page 30 of the 2025-2026 Multifamily Guidelines, there is a provision that "KHC may make exceptions to the firm commitment requirement for funds proposed from FHLB, Rural Development (RD), CDBG, HOME, and other HUD loans provided a letter of conditional commitment or intent to fund is submitted on the funding agency's letterhead. **KHC may also make exceptions to the firm commitment requirement for other funds provided by local, state, or federal jurisdictions, if the applicant submits evidence of an application for these funds and a written guarantee from the applicant that if the funds are not awarded, the applicant will contribute the amount of funds for which it applied and evidence its financial ability to do so.**"*

*Therefore, if the applicant submits evidence of the application to FHLB including the amount requested, along with a written guarantee that if the funds are not awarded, the applicant will contribute those funds and provides evidence of its ability to do so, KHC will allow the applicant to claim points for those funds. FHLB typically makes their award announcements in November, which is prior to KHC's awards in January 2025; therefore, if the applicant's FHLB application is not awarded, KHC will deduct those points from the final score.*

Question #4 The 2025-2026 Multifamily Guidelines state “the current version of the Multifamily Programs Guidelines supersedes all previous versions and unless otherwise stated or previously approved, all requirements and policies set forth in these Guidelines will apply to all applications and projects, regardless of when the project received funding” –does this mean my previously-funded projects can adhere to the new deadlines for technical submission and closing?

*KHC Response Applicants should adhere to the project deadlines as outlined in their award letter. Any policy changes or fee amendments highlighted in yellow in the 2025-2026 Multifamily Guidelines are applicable immediately to all projects. If you need clarification on the applicability of any provision of the Guidelines, please contact your assigned project specialist or you may email [multifamily@kyhousing.org](mailto:multifamily@kyhousing.org).*

Question #5 In the scoring workbook, it says that the *maximum* points will be awarded to the project with the most below-market sources (as defined by the guidelines) per unit, based on the average number of units provided in the application round, so points will then be awarded to other projects on a relative basis. It is my understanding that this is to mean that all projects with less than the highest amount of below-market sources would be awarded points relative to the highest scoring project. Is this correct?

*KHC Response Yes, KHC will average the number of units of all applications submitted in each pool (new supply-urban and new supply-balance of state). Then each project application would have the total eligible permanent below-market sources of funds proposed divided by that average number of units to determine the per unit amount for each application. The application with the highest dollar amount per unit will receive the maximum points in that category (20 points for urban, 15 points for balance of state). All other applications will be ranked in descending order from next highest per unit to least, and each one will receive a pro-rated score based on the number of competing applications in that pool.*

Question #6 Can a woman-owned business enterprise (WBE) qualify for the MBE adjustment noted in the 2025-2026 Qualified Allocation Plan?

*KHC Response No, the MBE adjustment is for projects with a developer or co-developer that is a minority-owned business enterprise (MBE) as defined on the [Minority & Women Business Enterprise Certification Program](#) page of the Kentucky Finance & Administration Cabinet website.*

Question #7 For the Census Report attachment required for the PolicyMap scoring criteria, do we follow the same directions from last year for the Census Tract Report? I am assuming we would no longer choose the 2010 census tract number, but should we choose the ACS2023 option for both or the Public\_AR\_Current for Benchmark and Current\_Current for Vintage?

*KHC Response Applicants should go to the [Census Bureau website](#) and enter the property address, but leave the default settings for Benchmark (Public\_AR\_Current) and Vintage (Current\_Current).*

Question #8 Under the “Land Donation” section of the 2025-2026 Qualified Allocation Plan, it states that points will only be awarded if the development budget shows no more than \$5,000 in the cost line items for land and buildings on the underwriting model. However, the underwriting model instructs you to include the full value of donated land. How should we proceed?

*KHC Response You would only need to include the full value of any land or building donations on the underwriting model if you are proposing to use the value of the donation as match for any KHC HOME funds requested. Otherwise, you should leave the land/buildings cells blank (if it’s a full donation) or enter the reduced amount paid (not to exceed \$5,000).*

Question #9 One of the scoring criteria is tied to the “Local Median Household Income as a share of Area Median Household Income” layer on PolicyMap. The data I saw for that earlier this year is different from what I gathered when compiling documents for my application. Will we be scored on the data as it was when I pulled it from PolicyMap earlier this year or the most recent vintage, which may change our self-score of the application?

*KHC Response KHC will utilize the most recent PolicyMap data for scoring purposes, as it describes the state of the locality as it currently exists rather than how it was before the most recent update. In this instance, the update to this dataset took place on May 14, 2024. After meeting with PolicyMap staff, we have been assured that this was an anomaly as updates typically occur at the beginning of the year. During the scoring process, KHC staff will be verifying the data you have pulled and if it is out of date, we will use the currently available data for scoring. Therefore, if you have pulled data that has yet to be submitted but was collected prior to May 14, 2024, you should collect and submit the most recent data for scoring purposes. Keep in mind, this is a relative scoring item in that the PolicyMap data for your project will be ranked as compared to other applications, with the highest median income receiving the maximum points.*