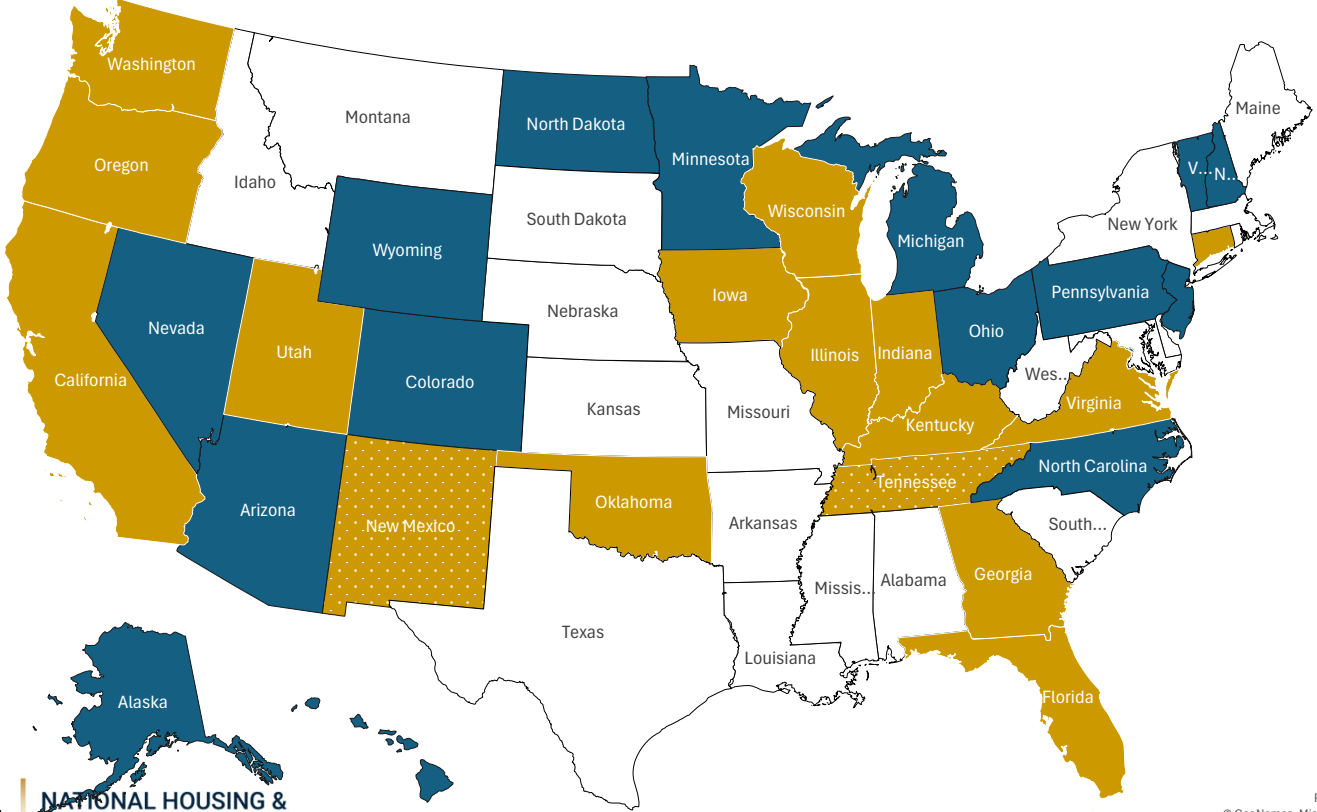


25% Test Changes after OB3

as of Nov. 5, 2025

□ No Announcement ■ Policy Coming Soon ■ Draft Policy ■ New Policy



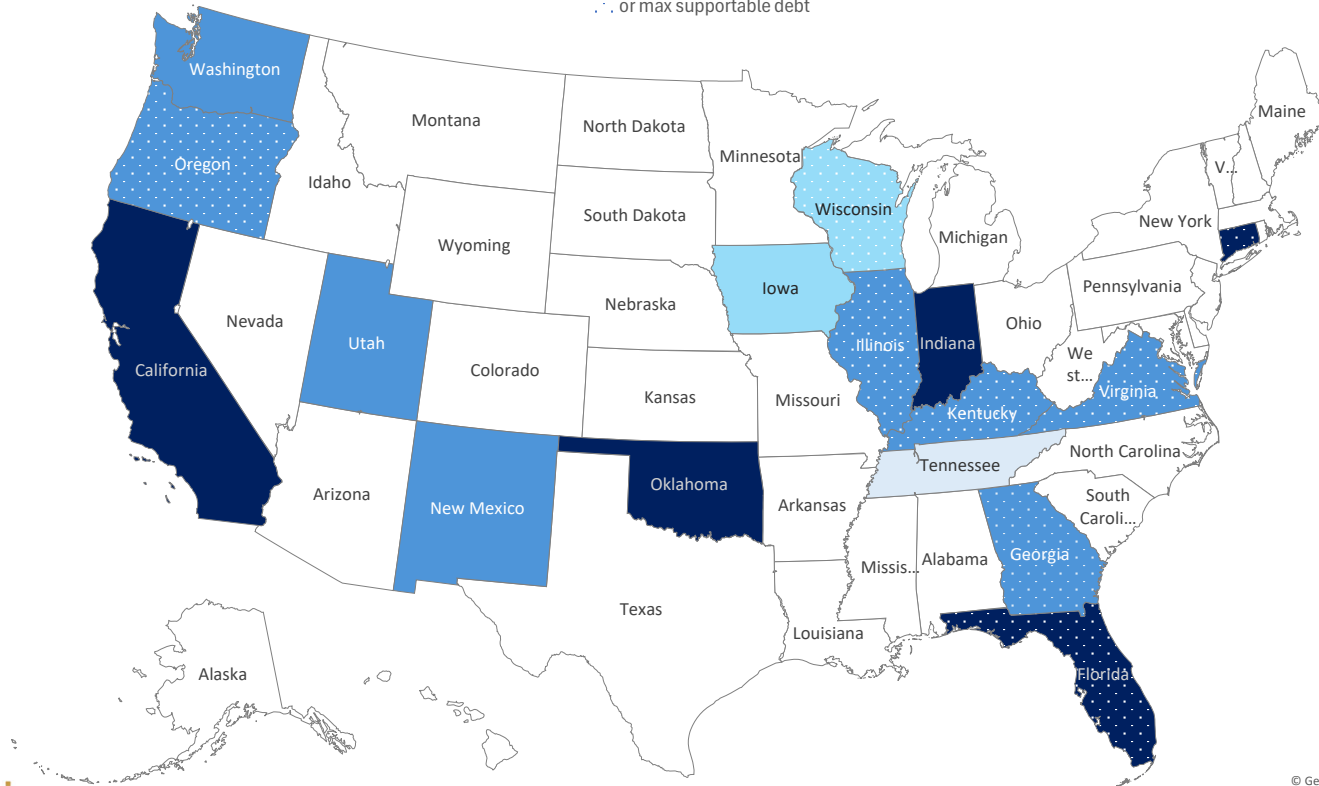
NH&RA State Tracker



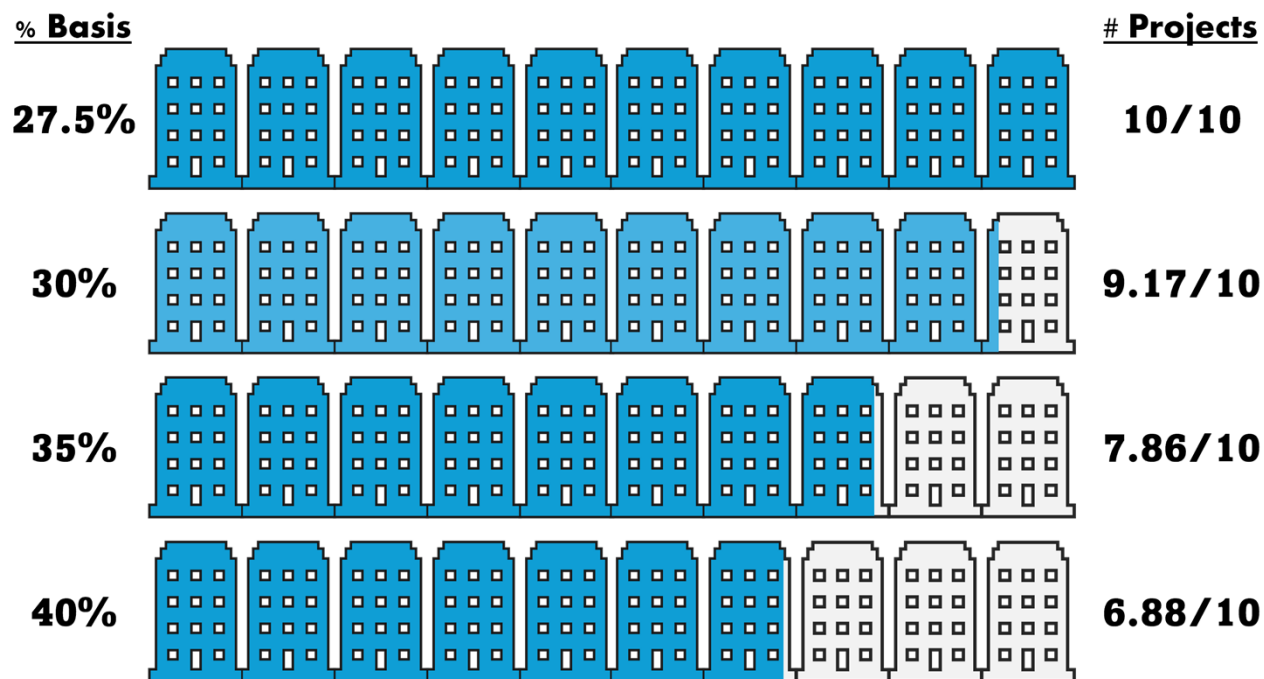
Percent of Aggregate Basis

as of Nov. 5, 2025

■ < 30% ■ 30% ■ 35% ■ > 35%
■ or max supportable debt

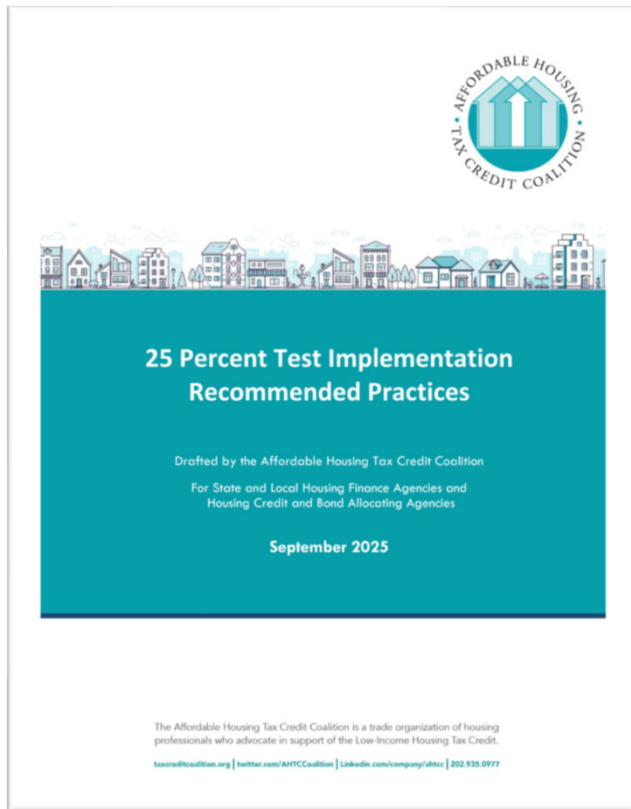


Higher % of Basis = Fewer Projects Funded



AHTCC: 25% Test Implementation Recommended Practices

- **Setting a PAB Aggregate Basis Ceiling**
- **Establishing and/or Enhancing Bond Recycling Programs**
- **Maximizing PABs for Multifamily Development**
- **Providing Tools to Incentivize Developers to Return Excess Volume Cap**
- **Bifurcating 4% and 9% Policies to Maximization Bond Program Production**



Public Welfare Investment (PWI) Cap

- Increase from 15 to 20%
- Last increased in 2006
 - from 10 to 15%
- Legislative Path
 - Community Investment and Prosperity Act (CIPA) (S.2454)
 - ROAD to Housing Act (S.2651)
 - Included in Senate-Passed FY 2026 National Defense Authorization Act (NDAA)

AHTCC/AHIC/NAAHL Survey

- 22 banks (\$14B or 2/3 of all bank LIHTC investments)
- 42% (\$6.1B) of investments came from banks nearing cap
- “These banks would potentially be able to increase their affordable housing investments if the PWI cap were lifted to 20 percent, tax capacity permitting, but are otherwise currently limited in their ability to make additional affordable housing investments.”

