Idaho Housing and Finance Association

HOME, HOUSING TRUST FUND & NEIGHBORHOOD STABILIZATION PROGRAMS

2019 ANNUAL ADMINISTRATIVE PLAN

PROPOSED CHANGES

Comment Period- January 21 - February 4, 2019

Only substantial changes to the current (2018) Annual Administrative Plan are identified. Approved changes will be added to the 2019 Annual Administrative Plan, which goes into effect on 4/1/2019

2018 Annual Administrative Plan- https://www.idahohousing.com/federal-programs/home-program/

CHAPTER 1- OVERVIEW

- **(*New*) Definition of Underserved**

Add definition of "Underserved"

Pg. 6

Proposed Language A locality in which an affordable multifamily rental project has not been approved by IHFA for 5 or more years.

CHAPTER 2- ELIGIBLE ACTIVITIES & REQUIREMENTS

RENTAL HOUSING ACTIVITIES

- **HOME & HTF Rental Housing Activities**

Pg. 6.

Add new language

Proposed Language

(*New*) Rehabilitation with Refinance of Existing Debt

IHFA may consider refinancing of existing debt if the debt **was not made or insured by any Federal Program** (CDBG, USDA-RD, VA, HUD-202 or 811 or 221(d(4), PHA Capitol Fund, FHA) and substantial rehabilitation is the primary activity. Activity is eligible within Idaho except the City of Boise.

General Requirements:

1) Refinancing is necessary to permit continued affordability of the project;
2) Remaining affordability period is more than 15 Years;
3) A review of the owner's financial statements and property management practices clearly demonstrate there is no disinvestment in the property;
4) Feasibility of serving the current target population over an extended period, as demonstrated by pro forma;
5) Substantial Rehabilitation of all units and tenant common areas is necessary, as demonstrated by a Physical Needs Assessment ("**PNA"**).
   a) "Substantial Rehabilitation" defined as ≥$25,000 per unit in hard rehabilitation costs. "Hard" rehabilitation costs for this activity defined as site work, physical improvements, and construction contingency.

PNA must meet the following requirements:

b) Assessment must be conducted or updated within the previous 6 months;

c) Assess the physical condition of all major systems, structures, units, and tenant common areas;

  i. Identify any major system with a useful remaining life of less than 15 years. Any major system with less than a 15-year useful remaining life must be replaced as part of the rehabilitation project.

d) Prepared by an independent architect/engineer who is licensed and certified by the State of Idaho;

e) Architect or Engineer must certify the PNA is an accurate assessment of the entire property and includes an assessment of the items needed to comply with the Property Standards:

Property Standards- State of Idaho's building codes, applicable local property standards and ordinances, Uniform Physical Condition Standards (UPCS), applicable federal crosscutting regulations (Fair Housing Act, Section 504, ADA, UFAS, HUD Lead Safe Housing Rule) and ASHRAE 90.1 for Multifamily buildings.

- **PNA Inspectable Components**

  1. Site- Topography, drainage, pavement, curbing, sidewalks, parking, landscaping, amenities, water, storm drainage, gas and electric utilities, playground, site furniture, irrigation system;
  2. Assess potential impact of natural disasters, (e.g. earthquake, flooding, wildfires, drought) in accordance with state and local code;
  3. Estimate the useful remaining life of all Major Systems and components based on current age and condition. *Major Systems defined as structural support, roofing, cladding and weatherproofing, plumbing, electrical, heating, and air conditioning.*
  4. Exterior walls, balconies, exterior doors and windows, roofing system and drainage;
  5. Interior finishes of all units and tenant common areas (carpeting, vinyl tile, plaster walls, paint condition, etc.), unit kitchen finishes and appliances, unit bathroom finishes and fixtures;
  6. Lobbies and corridors

- **PNA Must Also Address the following**

  1. **Critical Repair Items-** Identify all health and safety deficiencies and violations of building code, and local property standards/code that require immediate remediation.
  2. **On-site inspection of all units and tenant common areas-**

     - Identify all physical deficiencies based on (i) visual inspection and survey, (ii) review of pertinent documentation, and (iii) interviews with the property owner, management staff, tenants, community groups, and government officials;
     - Explain how the Project will meet handicap accessibility requirements;
     - Identify physical obstacles and describe methods that can be taken to make the project accessible;
     - Prepare a Scope of Work that follows the HOME Rehabilitation Standards See Admin Plan Exhibit C;
     - Determine the cost/benefit of each significant work item in the rehabilitation plan (items greater than $5,000) that will reduce operating expenses and/or tenant expenses (e.g., individual utility metering, extra insulation, thermopane windows, and setback thermostats.

- **(*New*) Financial Accountability Standards Requirement**

Pg. 7

Add new application submission requirement.

IHFA is required to determine an acceptable level of portfolio risk, net worth, predevelopment funding, and liquidity, based on the size, scope, and complexity of the proposed project (CPD-15-11).

> Proposed Language
>
> Applicability: Owner, Developer
>
> CPA-Reviewed Financial Statement submitted with each application for funding. IHFA will determine if the owner, developer has adequate financial management systems and practices, and sufficient financial resources to carry out the project to completion.

- **(*New*) Project Completion Deadline**

Pg. 8

Add new project completion deadline requirement

> Proposed Language
>
> Owner is required to submit all HOME/HTF project completion documentation within 6 months of the issuance of the final Certificate of Occupancy. Failure to do so could cause the forfeit of any undisbursed developer fee, and a negative determination of development capacity on future projects. See Project Completion @ Definitions.

Definitions

- **Project Completion**

Pg. 28

Revise definition

> Proposed Language
>
> The date title transfer requirements are complete, all construction work performed, a final Certificate of Occupancy issued, property meets HOME property standards and applicable cross cutting regulations, final drawdown of funds disbursed, owner-certified Sources and Uses submitted to IHFA, and all project completion data has been entered into HUD's Information and Disbursement System (IDIS).

SINGLE-FAMILY ACTIVITIES

Definitions and Requirements

- **Asset Limitation**

Pg. 32

Add new exception to current asset limitation for homebuyer household when all household members are under age 62

> Proposed Language
>
> A household's liquid assets at the time of application for HOME/NSP funding cannot exceed $30,000.00 (excluding retirement accounts), except when the overage is solely because of the recent sale of the homebuyer's principle residence.

- **(*New*) Financial Accountability Standards**

Pg. 32

IHFA is required to determine an acceptable level of portfolio risk, net worth, predevelopment funding, and liquidity, based on the size, scope, and complexity of the proposed project (CPD-15-11).

> Proposed Language
>
> Applicability: Owner, Developer
>
> CPA-Reviewed Financial Statement submitted with each application for funding. IHFA will determine if the owner, developer has adequate financial management systems and practices, and sufficient financial resources to carry out the project to completion.

- **Homebuyer Credit Approval**

Pg. 32

Add language to clarify a primary lender's approval of a homebuyer's credit does not guarantee qualification or approval for HOME/NSP assistance.

- **Homebuyer Education Course Requirements**

Pg. 34

Add new regulatory guidance that now requires all homebuyers to complete one "individualized" counseling session. This session includes the completion of a recurring monthly expenses budget, which will be submitted to the HOME Program Department, and used to help determine if the homebuyer has the ability to sustain a mortgage.

> Proposed Language
>
> Requirements:
>
> - Completion of an IHFA-approved Homebuyer Education course, i.e. *Finally Home*®; and
> - One individualized (one-on-one) homebuyer counseling session:

- **HOME Program-** No minimum number of hours. Homebuyer(s) must complete a recurring monthly expenses budget during the session, then submitted to the HOME Program Department, and used to evaluate the funding request.
- **NSP Program-** Minimum 2 hours of individualized homebuyer counseling required. Homebuyer(s) must complete a recurring monthly expenses budget during the session, to be submitted to the HOME Program Department, who will use it to help evaluate the funding request.

- **Methods Used Recapture HOME and NSP Funding- Homebuyer Housing**

Add a second new HUD-approved method to maintain long-term affordability of an assisted unit and recapture program funds when a homebuyer sells their assisted unit or no longer occupies the assisted unit as required during the period of affordability.

Proposed Language-

- **(*New*) Resale provision**

IHFA will follow the HOME program's ***Resale Provisions*** whenever the homeowner holds title to the assisted unit, but the land is held in trust.

The HOME program's primary residency requirements are enforced through a Memorandum of Restrictive Covenants and Deed of Trust with the land trust.

The period of affordability is based on the total amount of HOME funds expended on the unit, including rehabilitation/construction costs, developer fee, and IHFA's project costs. The HOME period of affordability and the primary residency requirement do not exceed the regulatory minimum.

General Requirements

1) Resale can be used only when the land on which a HOME-assisted unit is located is held in trust for at least 50 years.
2) Land trust memorandum of restrictive covenants and deed of trust requires the following:
3) During the period of affordability:

a. All homebuyers must have an annual household income ≤ 80% AMI at the time the purchase contract is signed; sales price of the assisted unit must include a price reduction equal to the HOME development subsidy and the estimated value of the land; low-income sellers must receive a "Fair Return on Investment" as available from the net proceeds calculation; if the land trust fails to preserve the affordability of the unit during the period of affordability, the HOME development subsidy must be repaid,

b. The Land Trust will use a long-term ground lease and deed restrictions to enforce the HOME program's income limit, primary occupancy requirement, sales price restrictions, and the corrective action it will take if the homeowner is out of compliance. These legal instruments shall include the land trust's right to use a right of first refusal, and other means necessary to intervene and preserve the affordability of the assisted unit.

c. During the period of affordability, the land trust will submit an ***Income Verification and Certification form*** for IHFA review and approval, prior to the transfer of title.

d. During the period of affordability, the land trust will repay the HOME development subsidy when:

i. Unit is rented, leased, or otherwise vacated by the assisted homeowner (didn't receive an IHFA-approved Primary Residency Exemption. Click here Primary Residency Requirement), and refuses to return and occupy the unit as a primary residence;

ii. Title is transferred to a new homebuyer who is not income eligible (≤80% AMI);

iii. Foreclosure, transfer in lieu of foreclosure, or assignment of an FHA insured mortgage to HUD

4) After the period of affordability, if the land on which the assisted unit is located is taken out of the affordable housing trust, the HOME development subsidy must be repaid.

Capital Improvement- Defined

1. A major structure or system that meets the following conditions: (1) the cost of the improvement exceeds $3,000; (2) work completed within 5 years of the sale; and (3) the subsequent homebuyer is defined as low-income (≤80% AMI).
   (a) Major structure improvement is the addition of a bedroom, bathroom, or additional square footage, as approved by the land trust.
   (b) Major system improvement defined as new roof, shingles, HVAC, electrical, energy efficient windows, and/or doors, and/or insulation, as approved by the land trust.
2. The cost of the improvement must be directly incurred by the homeowner with no other reimbursement opportunity, i.e. insurance, gift, etc.
3. A receipt or other third-party proof of expenditure required, i.e. cancelled check, credit card statement. The work and improvement must be properly permitted, as required, with workmanship provided by a professional contractor with related experience. Workmanship and materials must meet current Idaho Residential Code.
4. The land trust or its designated representative must approve and inspect, and document compliance with the workmanship, materials, and finished product.
   i. If the homeowner is a professional contractor and has experience directly related to the type of work to be performed (i.e. can document direct experience installing the major system or structure in question), and performs the work him/herself, and all other conditions are satisfied, then the cost of materials can be included in the Capital Improvement calculation.
5. General repairs, updates and other improvements are not a capital improvement for the purpose of determining seller's "fair return on investment".

Development Subsidy

When the assisted unit is sold for the first time to a low-income homebuyer, the land trust will retain up to $40,000 per unit as development subsidy, as approved by IHFA.

- During the period of affordability, the land trust is not required to repay this subsidy as long as the land on which the unit is located remains in the land trust and the unit continues to be owned by a low-income homeowner;
- After the period of affordability, the land trust is not required to repay this subsidy as long as the land on which the unit is located remains in an affordable housing land trust.

HOME Subsidy

- No additional HOME subsidy provided to the land trust for the assisted unit
- No direct HOME subsidy provided to any homebuyer for the assisted unit

Deed of Trust and Restrictive Covenants

During the period of affordability, IHFA will enforce the primary residency requirement and the 80% AMI homebuyer requirement through a restrictive covenant with the land trust.

A deed of trust will secure IHFA's right to recover the HOME development subsidy in the event the land trust does not utilize its purchase option, right of first refusal, or any other means necessary to intervene and preserve the affordability of the unit. The deed of trust remains in place after the period of affordability.

IHFA will allow the use of other notes and mortgages in addition to, but not in lieu of, the HOME covenants and deed restrictions.

Fair Return on Investment ("FRI")

During the period of affordability, whenever the assisted unit is sold and the subsequent buyer is low-income (80% AMI), then a low-income seller is entitled to a fair return on their investment as available from the net proceeds of the sale. Seller's Fair Return on Investment can never exceed the amount of net proceeds of the sale (see example at the end of this section).

However, if title to the assisted unit is transferred and the new owner is not defined as "low-income", then seller is not entitled to a fair return on investment, as defined in this section.

Low-Income Seller's Investment-Calculation

1) Seller's Equity (mortgage paid down); **plus**
2) 50% of Capital Improvement(s) as defined in this section; **plus**
3) Up to 1.5% CPI inflation rate as determined by the Consumer Price Index, times (×) Seller's purchase price, times (×) the number of years the seller owned the unit.

   Consumer Price Index[1] Inflation Calculator at https://www.bls.gov/data/inflation_calculator.htm

Foreclosure, Transfer In Lieu Of Foreclosure, Or Assignment of an FHA Mortgage

As described at 92.254(a)(5)(i)(A), the HOME Resale Provisions can be extinguished by a senior lender only in the event of foreclosure, transfer in lieu of foreclosure, or the assignment of an FHA mortgage in order to clear title. Under any of these circumstances, the land trust would be required to repay the development subsidy to IHFA.

Homebuyer Preference Populations

The land trust may choose to provide a preference if the specific population is deemed essential to the local community and the preference population does not violate Federal Fair Housing and Equal Opportunity laws, executive orders, or program regulations. Some examples are: Education providers, firefighters, law enforcement, medical providers, etc.

- A homebuyer preference is allowed only if identified in the HOME written agreement and the memorandum of restrictive covenants.

Homebuyer Income Limit

Homebuyer household annual (gross) income ≤80% AMI [24 CFR 5.609].

[1] A consumer price index (CPI) measures changes in the price level of consumer goods and services purchased by households. The CPI is a statistical estimate constructed using the prices of a sample of representative items whose prices are collected periodically.

Reasonable Range Of Low-Income Homebuyers

The assisted unit must remain affordable to a *reasonable* range of low-income homebuyers during the period of affordability. IHFA defines reasonable as 50%-80% AMI. At its discretion, IHFA could allow a lower AMI when additional subsidy is provided by another private or public source, and the homebuyer has good credit and

a stable work history.

Maximum PITI (Principal, Interest, Taxes, Insurance)

PITI is 35% of the household's gross monthly income. However, IHFA may allow a higher PITI if the homebuyer has good-to-exceptional credit history, stable work history, and loan approval from an IHFA-approved lender.

Sales Price Determination During HOME Period of Affordability

The following procedures must be used to determine the maximum sales price of the assisted unit during the HOME Period of Affordability:

Initial Sale

Step #1 Determine the estimated **value of the property** (land under the unit and the unit) using one of two approved methods:

- Comparative Market Analysis or Broker's Price Opinion completed by a licensed real estate professional who is familiar with the local neighborhood market conditions
- Appraisal

Step #2 Determine the estimated **value of the assisted unit** by deducting the following from the estimated value of the property (as determined in step #1):

- Estimated value of the land under the unit
- HOME development subsidy

Step #3 The negotiated sales price between the willing buyer and willing seller is the Fair Market Value of the unit. The negotiated sales price of the unit cannot exceed the estimated value of the unit as determined in step #2.

Subsequent Sales During The Period Of Affordability

The maximum sales price is the total of the following:

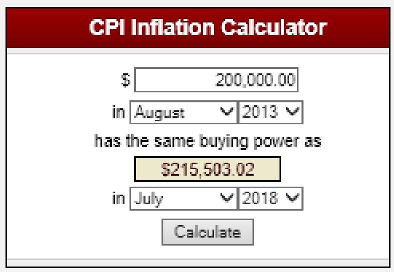
1) Amount of senior lien repayment due
2) Seller's initial closing costs (when they purchased the unit)
3) Seller's Fair Return on Investment Calculation

The negotiated sales price between the willing buyer and willing seller is the Fair Market Value of the unit, but cannot exceed the total of 1-3 above.

Two Examples of Resale Provision Calculation

Initial Sale- 1st Qtr. 2013	
Estimated Value= $200,000 Value of Land= -$45,000 IHFA Subsidy= -$40,000 Initial Sales Price	$115,000
Subsequent Sale- 2nd Qtr. 2018	
Seller's Equity (mortgage paid down)	$15,000
Senior Lien payoff	$100,000
Capital Improvements (50% within 5 yrs.)	$2,500
Seller's Closing Costs	$8,000
Maximum 1.5% CPI (x) Initial Sales Price	$8,625

https://www.bls.gov/data/inflation_calculator.htm



Subsequent Sales Price & Seller's Return on Investment Calculations

No.	**Appreciating Housing Market** Sold 2nd Qtr. 2018		**No.**	**Depreciating Housing Market** Sold 2nd Qtr. 2018	
	Estimated Value Of Property- $225,000 Less Value of Land- $45,000 Less IHFA Subsidy- $40,000 **Estimated Value of UNIT in 2018**	$140,000		Estimated Value Of Property- $190,000 Less Value of Land- $20,000 Less IHFA Subsidy- $40,000 **Estimated Value of UNIT at time of sale**	$130,000
1	Less Seller's Senior Lien Repayment- $100,000 Less Seller's Closing Costs- $8,000	-$108,000	**1**	Less Senior Lien Repayment- $100,000 Less Seller's Closing Costs- $8,000	-$108,000
	Estimated Net Proceeds (equals estimated value of unit + No. 1 above)	**$32,000**		**Estimated Net Proceeds (equals estimated value of unit + No. 1 above)**	**$22,000**
2	**Owner's Investment** 1st- Mortgage Equity- $15,000 2nd- Capital Improvements- $2,500 3rd- CPI 1.5% inflation rate- $8,625	$26,125	**2**	**Owner's Investment** 1st- Mortgage Equity- $15,000 2nd- Capital Improvements- $2,500 3rd- CPI 1.5% inflation rate- $8,625	$26,125
	Owner's Fair return on Investment as available from Net Proceeds equals (the lesser of Return on Investment in No. 2 or Net Proceeds)	**$26,125**		Owner's Fair return on Investment as available from Net Proceeds equals (the lessor of Return on investment in No. 2 or Net Proceeds)	**$22,000**
	Maximum Sales Price to next Low-income Buyer (cannot exceed the total of No. 1+2 above)	$134,125		**Maximum Sales Price to new Low-Income Buyer** (cannot exceed total of No. 1 + 2 above)	$134,125

- **Principal Residence Requirement- Hardship Exemptions**

Pg. 37

Add new requirement under past-secondary education exemption that requires physical attendance of an institution located more than 50 (highway) miles from the assisted unit (to qualify as a hardship exemption).

Add new language to establish a maximum lease terms of 6 months while homeowner has an exemption Additional 6 months lease terms are allowable as long as the homeowner continues to receive the hardship exemption.

- **(*New*) Refinancing, Home Equity, and Subordination**

Pg. 38

Revise current language to allow cash-out refinancing or home equity loans under certain conditions. Current language prohibits all cash-out refinancing or home equity loans

Proposed Language
Home equity loans or cash-out refinancing of the primary mortgage is allowed under certain circumstances with prior approval by IHFA's HOME Programs Department: • Lower interest rate or payment • Remove PMI • Medical hardship and/or death of homebuyer/immediate family member • Emergency home repairs for assisted unit • Capital improvements for assisted unit Documentation is required to substantiate all claims and disbursements. Disbursement(s) must be paid directly to a third party through a title company. Borrower allowed a (one) single disbursement. Must use an IHFA approved lender and loan product. • Home equity line-of-credit, debt consolidation, cash-in-hand **not** allowed

- **(*New)* Maximum Origination Fee/Charge**

Pg. 41

Add new language to limit the amount of origination fees lenders can charge a homebuyer. Industry standard is 0.5% to 1% of the loan amount.

Proposed Language
Each lender is limited to a maximum origination fee of 1.5% per loan.

- **Maximum Assistance to Homebuyer**

Pg. 41

Increase current HOME/NSP homebuyer assistance levels as the homebuyer increases their personal investment in the property.

Homebuyer Investment (contribution)	Assistance to Homebuyer
$500 (minimum amount required)	Up to 10% of sales price
$1,000	Up to 15% of sales price
0.50% of sales price	Up to 20% of sales price

CHAPTER 4- HOME MATCH

- **(*New*) Forbearance of Fees and Waive/Reduced Taxes**

Pg. 2

Add new language to clarify reduced and waived fees/taxes can be applied (banked) as HOME Match only at the time a unit of government actually issues the waiver or reduced fee/tax.

Add language to clarify that only the amount equal to the HOME unit's prorated share of the reduced or waived fees/taxes is eligible HOME Match.

> Proposed Language
>
> Reduced or waived taxes/fees can be HOME Match eligible. However, this type of match can only be applied at the time the unit of government entity actually waives/reduces the fees/taxes.
>
> To apply the match credit, IHFA must have formal documentation from the local government entity describing the property address or legal description, the date of the reduced/waived fees/taxes, and the amount of reduced/ waived fees/taxes. When documentation is received, the amount must be prorated to determine the HOME program's share of the waived/reduced fee/taxes. HOME's prorated share is determined by the total number units in the project, divided by the number of HOME/HTF assisted units in the project, times the number of HOME/HTF assisted units.

- **Value of Donated Land or Other Real Property**

Pg. 3

For match purposes, a 99-Year leasehold is required to meet the definition of "ownership".

- **(*New*) Ineligible Match**

Pg. 6

Add new category of Ineligible Match

> Proposed Language
>
> Any property purchased with non-federal funds then donated by the applicant or recipient(s) of HOME assistance or contracts, including investors who own, will work on, or will apply for HOME assistance. See Chapter 6- Identify of Interest.

CHAPTER 6- CROSSCUTTING REGULATIONS

- **(*New)* Identity-of-Interest**

Pg. 25

Add the following requirement. Language currently exists in HOME loan and regulatory agreements, but is added to the annual administrative plan for consistency.

Proposed Language

Identity-of-Interest:

Any perceived or actual Identity of Interest relationship must be disclosed to IHFA immediately and in writing. Failure to do so may result in corrective action, including denial of revocation of funding.

[§92.356(a-c) & 93.353] A conflict of interest exists if any **officer, employee, consultant, director, board member, elected/appointed official, immediate family member, business, or authorized agent** of IHFA has or may have a financial interest in, or financial gain, profit, including a contract or subcontract with respect to an assisted project.

An identity of interest relationship exists if any officer, director, board member, or authorized agent of the project or development team (consultant, general contractor, supplier, vendor, vendee, attorney, management agent, seller of the land, etc.) if the person or entity

(i) is also an officer, director, board member, or authorized agent of any other member of the project or development team;

(ii) has any control or a financial interest in any other project or development team member's firm or corporation;

(iii) is a business partner of an officer, director, board member, or authorized agent of any other project or development team member;

(iv) has a relationship by blood, marriage or adoption with an officer, director, board member, or authorized agent of any project or development team member;

(v) advances funds or items of value to the owner, developer or sponsor.

CHAPTER 8- MULTIFAMILY RENTAL APPLICATION

- **Maximum Number of Open Projects and Funding**

Pg. 10

Clarify and revise current language regarding the maximum number of open projects and funding

Proposed language

A project sponsor, owner, or developer is not allowed more than three (3) "open" projects at any one time, or a combined total of HOME funds awarded to or committed to "open" project(s) of more than $3,000,000. "Open" defined as any phase of the project, including an award, commitment, development, and close-out. An open project will not be counted if the project is on schedule and will be completed in IDIS within 60 days of the application deadline date.

This limitation may be waived only if the owner, developer, and general contractor can each provide IHFA documented evidence they have current capacity to successfully manage three open projects simultaneously, i.e. met all development milestones according to schedule, and completed the project close-out process in a timely and efficient manner.

A written request for waiver and supporting documentation must be submitted to IHFA no less than 10 working days prior to the application deadline.

Additional consideration may be given if owner, developer, and general contractor all meet the capacity requirement and the proposed project meets one of the following:

a) Will serve a Special Housing Needs population as identified in the Consolidated Plan (See Chapter 1)
b) Project is located in an underserved area or a community defined as rural by USDA-RD (see Chapter 1)
c) Project is defined as "Preservation" (See Chapter 2 @ Definitions)

Housing Trust Fund Program- Specific

Same requirements as above, except the maximum combined total of HTF funds is **$2,000,000.**

- **HTF-Specific Scoring**

Pg. 17

Affordability Period

Remove additional points for applications that commit to an HTF-period of affordability that matches the LIHTC Extended Use (40 years). HTF requires a 30-year period of affordability, and IHFA will not exceed HTF regulatory minimum.

- **Match**

Pg. 19

Remove "***Forbearance of fees and waived/reduced taxe***s" as allowable Match for application scoring purposes. See Chapter 4 for additional information.