

Affordability Test – Frequently Asked Questions

Entering Rents

When entering total rent, should we enter "market" or "effective" rent?

For purposes of determining affordability using the Affordability Test, please enter contract rent for occupied units and market rent for vacant/unoccupied units. Contract rent is the rent that is specified in the rental contract and rent concessions shall not be considered, i.e., contract rent is not decreased by any rent concessions. Market rent is the anticipated rent for similar units in the neighborhood as determined by the lender or appraiser for underwriting purposes.

If you have a rent roll with one-bedroom units at different costs, should you take an average or do you have to enter each unit and its rent separately within the test?

Whenever possible, we encourage users to enter unit-level information into the Affordability Test. However, in instances where entering the unit-level information is operationally not feasible, we recommend that you try to create "rent buckets" that group units with similar rents. See example below.

Suppose we are evaluating a property in **Los Angeles**, **California**, where there are six 1-bedroom units with the following monthly rents: \$630, \$650, \$670, \$675, \$685, and \$695. If the tenant is responsible for the heating or cooling utility bill, then the 1-bedroom FHFA utility estimate of \$88 should be added to the monthly rents. The relevant monthly rents become \$718, \$738, \$758, \$763, \$773, and \$783. In addition, let's assume that the MFI (Median Family Income) Rent Threshold to qualify for very low-income (VLI) is \$990.94 in this instance. Accordingly, any unit where the relevant monthly rent is less than \$990.94 would qualify as a "VLI unit." For ease of using the Affordability Test, you may group the six 1-bedroom units into two buckets (two rows of entry) as follows:





How does the Affordability Test track Section 8 residents who qualify for very low-income (VLI) units but may be paying a market rent?

For units where tenants receive federal rental subsidies such as Section 8 vouchers, the relevant rent for purposes of determining affordability using the Affordability Test will automatically calculate the contract rent net of rental subsidies, i.e., rent subsidies are subtracted from the contract rent. Enter the contract rent in the 'Contract Rent' column and enter the subsidy in the 'Subsidy' column as a positive number. Please contact your Freddie Mac representative for further guidance on transactions with federal rental subsidies.

Entering Utilities

What is included in the definition of utilities?

The FHFA utility estimates should be used whenever the tenant pays Utilities separately from the rent either directly to the utility provider or reimbursed to the landlord (i.e., select "Y" in cell B4 of the Affordability Test). "Utilities" include electricity, gas, water, fuel, sewage and trash collection. It does not include TV, telephone or internet.

If we have actual utility allowances for Low-Income Housing Tax Credits (LIHTC)/Housing Assistance Payment (HAP) contract deals, can we use the actual?

At this time, please use the FHFA utility estimates for the purpose of estimating VLI units using the Affordability Test. Project-specific utility allowances should not be entered in the Affordability Test.

Is the FHFA utility estimate 'one size fits all' and not estimated by state and county?

Yes, the FHFA utility estimate is a set of national-level assumptions that does not vary by state or county.

Qualifying for Targeted Affordable Housing (TAH)

Are forwards or funded forwards eligible?

Forward commitments, including funded forwards, are not eligible for affordable goal until the property enters its permanent phase and Freddie Mac purchases the mortgage loan. Please contact your Freddie Mac representative for further guidance on transactions with a forward commitment component to the extent that other loans are being done at the same time as a forward, such as an Intermediary Relending Program (IRP) loan.

The MFI Rent is based on HUD MFI. In certain markets the MFI has decreased resulting in decreased rents, but, for many older LIHTC deals, the tax code allows them not to reduce their rents but remain affordable per a Land Use Restriction Agreement (LURA). Is there any adjustment available in this circumstance?

The Affordability Test should not be used for properties subject to regulatory agreements that restrict occupancy to very low-income tenants (i.e., 50% of area median income or lower). To determine the number of qualifying affordable units for properties that restrict all or a portion of the property to occupancy by very low-income tenants, please provide a copy of the regulatory agreement that documents the set aside requirements for very low-income tenants. The lender will also be required to confirm that it has no evidence of non-compliance with such regulatory agreement. Please contact your Freddie Mac representative for further guidance.



Qualifying for VLI Incentives

How many units or percentage of the property needs to be VLI to qualify for preferred pricing? The VLI incentive fee will apply if Freddie Mac purchases a loan as follows:

- For properties with less than 100 units: 50% of the units qualify for VLI or minimum of 50 VLI units.
- For properties with greater than 100 units: 25% units qualify for VLI and minimum of 50 VLI units.
- Properties with greater than 1,000 units will require discussion.

Please contact your Freddie Mac sales representative for further guidance on loan pricing.

Operational Efficiencies

When does this information get submitted to Freddie Mac — at initial quote, prescreen or full underwriting?

For conventional loans, please submit your VLI unit estimate at initial quote. For TAH loans, please contact your Freddie Mac representative for further guidance.

If we know the property is already considered 'affordable' (i.e., project-based HAP contract, LIHTC, etc.), do we need to use and submit the results of this Affordability Test?

The Affordability Test should not be used for properties subject to regulatory agreements that restrict occupancy to very low-income tenants (i.e., 50% of area median income or lower). To determine the number of qualifying affordable units for properties that restrict all or a portion of the property to occupancy by very low-income tenants, please provide a copy of the regulatory agreement that documents the set aside requirements for very low-income tenants. The lender will also be required to confirm that it has no evidence of non-compliance with such regulatory agreement. Please contact your Freddie Mac representative for further guidance.

AMI Data

What are the rent threshold amounts at a specific affordability level?

The MFI (median family income) Rent Threshold amounts are in the "AMI Data" tab. The rent threshold amounts are specific for the state, county, and number of bedrooms. The amounts are based on the AMI for that location (in the "ami_fhfa" column).

The threshold amounts represent the maximum rent amount at which a unit can qualify for that affordability level. For example, for a 0-bedroom unit in Autauga County, AL, the maximum rent amount for the unit to qualify at 30% of AMI is stated under the column "mfi_rent_thrshold_030". The maximum rent amount for the unit to qualify at 50% of AMI is stated under the column "mfi_rent_thrshold_050", and so forth.



1	A	В	С	D	E	F	
1	Note: The AMI values are ad	djusted for unit size (i.e., number of bedrooms) as set f	orth in §1282.1	9 of the Housing Goals Regulati	ions and are represented as rent	threshold amounts at various r	ent affordability
2	State 👻	County	# Beds 💌	mfi_rent_thrshld_010 👻	mfi_rent_thrshld_020 💌	mfi_rent_thrshld_030 👻	mfi_rent_t
3	Alabama	Autauga	0	144.38	288.75	433.13	
4	Alabama	Autauga	1	154.69	309.38	464.06	
5	Alabama	Autauga	2	185.63	371.25	556.88	
6	Alabama	Autauga	3	214.5	429	643.5	
7	Alabama	Autauga	4	239.25	478.5	717.75	
8	Alabama	Autauga	5	264	528	792	
9	Alabama	Autauga	6	288.75	577.5	866.25	
0	Alabama	Autauga	7	313.5	627	940.5	
1	Alabama	Autauga	8	338.25	676.5	<u>م</u> 1014.75	
2	Alabama	Autauga	9	363	726	1089	
.3	Alabama	Baldwin	0	155.93	311.85	467.78	
4	Alabama	Baldwin	1	167.06	334.13	501.19	
.5	Alabama	Baldwin	2	200.48	400.95	601.43	
6	Alabama	Baldwin	3	231.66	463.32	694.98	
7	Alabama	Baldwin	4	258.39	516.78	775.17	
.8	Alabama	Baldwin	5	285.12	570.24	855.36	
9	Alabama	Baldwin	6	311.85	623.7	935.55	
0	Alahama	Paldwin	7	220 50	677.16	1015 74	
1	Alahama		8	365.31	730.62	1095 93	
		AMI Data +					•
Ready 🐻 🛱 Accessibility: Investigate 🔠 🔲 — —							+ 10