







What's Ahead for Medicaid & Housing: LIHTC & Other Housing Priorities in H.R. 1

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Stewards of Affordable Housing for the Future (SAHF)

SAHF is a **mission-driven collaborative** of nonprofit housing providers. We work to advance the creation and preservation of healthy, sustainable, affordable rental homes so that every person has a home in a flourishing community.



16K+ jobs supported each year by operating SAHF member housing and **\$960M**+ generated in business owners' income and wages, resident spending and taxes.

161K+individuals connected each year with the supports and services they need to thrive through resident service coordination at SAHF member homes



Our Members





























SAHF by the Numbers



231,000+

People Served by SAHF Members



Housing Providers





151,364 (+573)

Rental Homes for Families, Seniors, and Special Needs Populations



1,977 (+11)

SAHF properties are located in

49 states

+D.C., Puerto Rico, and the Virgin Islands

Multifamily Properties Across the U.S.



* As National CORE has been recently added as a SAHF member, their data is not included in the analysis

"One Big Beautiful Bill" Act Highlights

- Signed into law July 4 following party-line votes (House -July 3; Senate -July 1)
- "Budget Reconciliation" process allowed simple majority vote in Senate; limited to direct tax, spending and debt limit provisions (Byrd Rule)
- CBO estimates: budget **deficit will increase by \$3.4 trillion** over 2025-2034.
- Big Picture Highlights:
 - Extends key provisions of the 2017 **Tax Cuts and Jobs Act**
 - Some made permanent (e.g., individual tax rates), others temporary
 - Increases the debt ceiling by \$5 trillion
 - Reduces funding for safety net programs (SNAP, Medicare) and increases limits (work requirements, immigrant status)
 - Rolls back clean energy provisions of Inflation Reduction Act
 - Boosts spending for immigration and border enforcement





OBBA: Affordable Housing & Community Development Provisions

- <u>Permanent</u> Low Income Housing Tax Credit Provisions!
 - Lowers private activity bond (PAB) financing threshold from 50% to 25% of land and building costs for properties placed in service after Dec. 31, 2025, as long as at least 5% of the aggregate land and building costs are financed with PABs issued after Dec. 31, 2025
 - Increases 9% allocations for the Housing Credit by 12% (not 12.5% as included for four years in the House-passed reconciliation bill), starting in 2026

Impacts "As of Right" / 4% LIHTC

Impacts Competitive/
9% LIHTC

- Other tax provisions:
- Permanent 100% bonus depreciation for qualified properties, which should benefit Housing Credit investors and boost pricing
- Permanently extends the **Opportunity Zone** tax incentive
- Permanently extends the **New Markets Tax Credit** Program (locks in \$5billion annual authorization)

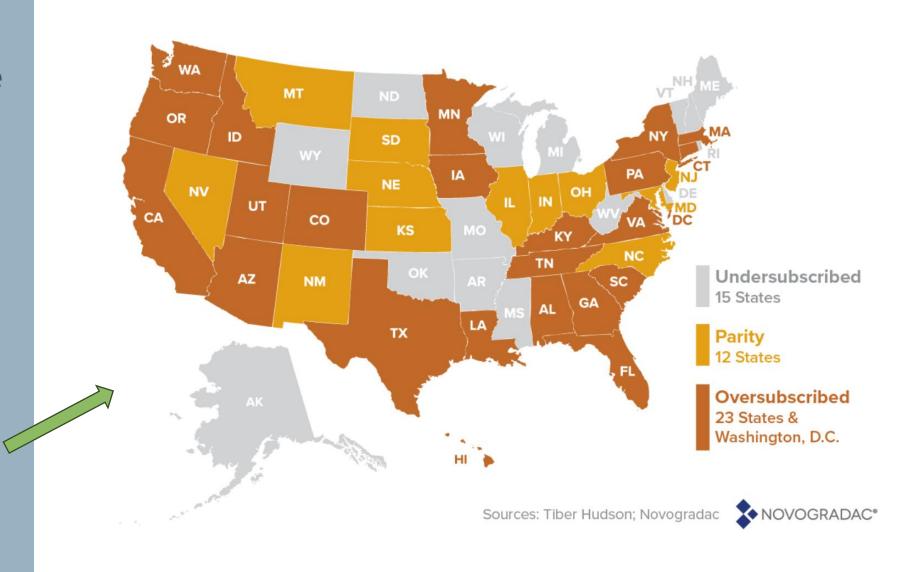


Deeper Dive Into Impact of OBBA Bond Test Provision

Novogradac estimates this change will finance 1.14 million additional affordable rental homes over 2026-2035 if:

- States used all the "freed" PAB cap for rental housing
- Sufficient <u>scalable</u> gap financing is available

Impact of change greater for oversubscribed and states at parity





How States are Implementing Bond Threshold Changes

Guidance Published Already:

- California
- Georgia
- Illinois
- Indiana
- Iowa
- Wisconsin

Anticipated Publishing:

- Hawaii 2026
- Kentucky Fall 2025
- Michigan 4th quarter 2025
- Minnesota 4th quarter 2025
- Nevada Fall 2025
- New Hampshire 4th quarter 2025
- New Jersey 2026

- New Mexico 4th quarter 2025
- North Dakota 2026
- Oregon Fall 2026
- Pennsylvania 4th quarter 2025
- Tennessee 4th quarter 2025
- Utah 4th quarter 2025
- Vermont 4th quarter 2025
- Virginia 3rd quarter 2025
- Wyoming 2026

State considerations/ areas for advocacy:

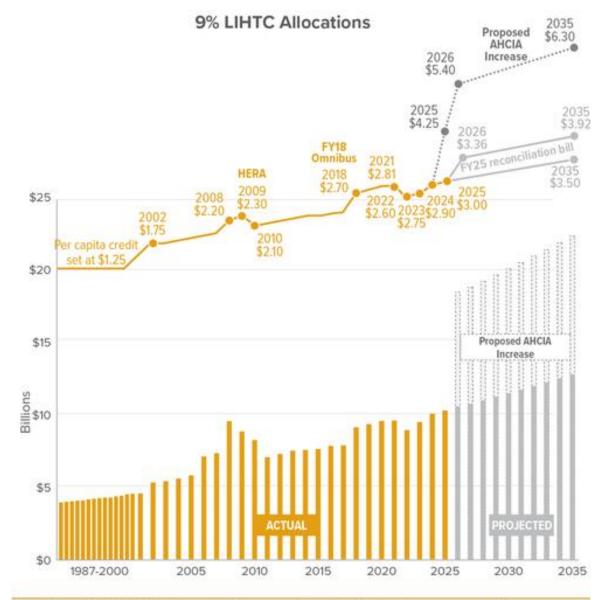
- 1) How much gap financing/ perm debt is available/needed?
- 2) How can we prioritize preservation transactions?
- 2) How will bond cap authority be directed?



Deeper Dive Into Impact of OBBA 9% Housing Credit Provision

This Novogradac chart shows 9 percent allocations by year, impacted by statutory changes including OBBA

- Estimates change will finance 800,000 additional affordable rental homes over 2026-2035
 - Estimate includes Census projections of stat pop growth and inflation but not tariffs which will likely add to development costs







Clean Energy Provisions

- Accelerates phase-outs of some Inflation Reduction Act of 2022 (IRA) energy tax credits
 - Terminates investment tax credit eligibility of wind, solar and energy storage projects for projects placed into service after Dec 31, 2027. Under IRA, it was originally until 2032. * Geothermal can still be used through 2032.
 - Wind and solar projects must now be placed in service before 2028 to claim Production Tax Credits.
- Broadens domestic content restrictions
- Rescinds unobligated funds from IRA funds including GRRP (\$138m), GGRF, Climate Justice
- Terminates authorization of GGRF and rescinds unobligated funds (99% of funds are officially obligated so unclear on impact of this provision)



Clean Energy Provisions Considerations & Questions:

<u>Time is of the essence:</u> Builders and developers hoping to claim the 45L credit must ensure that the homes are completed and acquired (sold or leased) before June 30, 2026.

<u>Potential Impact on Planning</u>: This change may impact existing planning and construction timelines, particularly for projects that were counting on the credit through 2032.





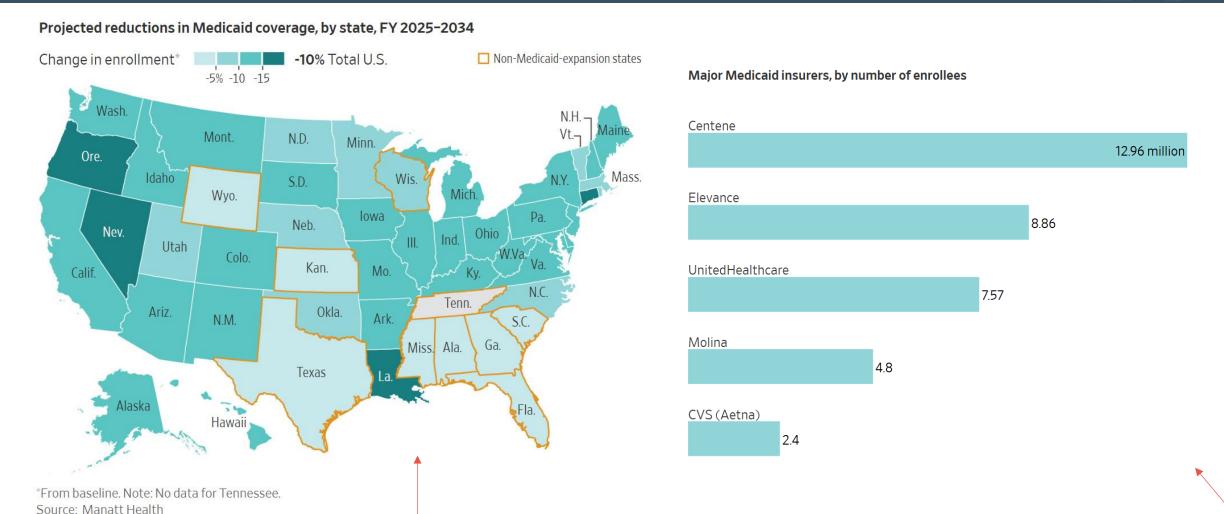
Medicaid & Social Safety Net Provisions

- <u>Medicaid:</u> CBO estimates that OBBBA will cut federal spending on Medicaid by \$1.02 trillion. 12-20 million people could lose coverage by 2034.
 - Adults eligible for Medicaid through ACA expansion must meet work and reporting requirements
 - Repealing the Biden Administration's rule simplifying Medicaid eligibility and renewal processes
 - Establishing a moratorium on new or increased provider taxes and reducing existing provider taxes in expansion states
 - Revising the payment limit for state directed payments
 - Increasing the frequency of eligibility redeterminations for the ACA expansion group
- <u>SNAP</u>: Expands work requirements and reverses paperwork-requirement exemptions for vulnerable groups. CBO estimates that this would cut SNAP by nearly 20% and remove 270,000 people off food assistance for three years.





Deeper Dive Into OBBA Medicaid and ACA Changes



Impacts Expected: Loss of coverage; Hospitals will lose funds; State budgets tighten; Fewer customers for insurers/payors



Medicaid & Social Safety Net Provisions Considerations & Questions:

- Impact on Medicaid cuts to affordable housing partnerships, services unclear— could be more of a push for evidence-based outcomes
- People in the lowest 10% of income distribution in the U.S. (WHICH IS THE SAHF MEMBER PORTFOLIO) stand to lose noncash government benefits such as Medicaid coverage and food stamps worth nearly \$1,600 per year (CBO Estimate).
- Loss of benefits and increased costs will further squeeze affordable housing residents who must make difficult decisions between paying for rent or other basic needs



