



Tennessee Housing Development Agency

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Multifamily Programs Frequently Asked Questions Last Updated April 7, 2026

2026 Multifamily Tax-Exempt Bond Authority Cycle

1. How much MTBA will be available?
Round availability announcements are posted on the [MTBA Program Page](#).
2. When will the registration period for MTBA applications begin?
THDA will open registration at least two business days before the editing period.
3. When will the editing period for MTBA applications begin?
The editing period is described in the 2026 MTBA PD Section 6-C. The Initial Application Submission Window opens February 20, 2026.
4. When will the editing period for MTBA applications end?
The editing period is described in the 2026 MTBA PD Section 6-C. The Initial Application Submission Window closes at 4:30 PM Central Time March 19, 2026.
5. Which portion of the QAP is applicable to Noncompetitive Housing Credits? 2026 LIHTC QAP Part I and Part III.
6. When will the THDA Templates be available?
2026 MTBA Initial Application templates were published on the [THOMAS](#)



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[Documents Page](#) in February 2026. THDA is currently updating all templates to ensure compliance with digital accessibility requirements; please refer to the [THOMAS Documents Page](#) to confirm the most current version of templates required at every application stage.

7. Where is Scoring information found? Are there different Scoring tracks for different construction types?
 - MTBA Score information for all construction types can be found in Section 8-B of the 2026 MTBA Program Description. MTBA Score will be used to rank applications within the Groups described in Section 9.
 - LIHTC Score metrics and minimums differ according to construction type. LIHTC Score information for New Construction and/or Adaptive Reuse applications can be found in Section 8-C of the 2026 MTBA Program Description. LIHTC Score information for Acquisition/Rehabilitation and/or Rehabilitation applications can be found in Section 8-D. Applications must meet minimum LIHTC Score requirements to be eligible for an allocation but will not be ranked according to LIHTC Score.

8. What is the Total Development Cost Waiver process for the MTBA cycle?
 - Applicants anticipating a need to exceed the Total Development Cost limit specified in Section 22-E of the 2026 QAP must add a waiver request to their application by selecting Action Requests, then Waiver in THOMAS and uploading supporting documentation along with an explanation of the request.
 - Explanations must provide as much specificity as possible, including the expected total development cost; specific items driving the need to exceed the cap; supporting figures; etc. Applicants are expected to be thorough regarding construction costs; a general desire for a “cushion” is insufficient justification to exceed the cap.

9. What happens after applications are submitted?
 - Following the initial evaluation by staff, applicants have a period of seven calendar days to address eligibility and/or scoring issues per Section 7 of the 2026 MTBA PD. Applicants unable to cure the application’s deficiencies may be removed from consideration with the option to resubmit in the next Round.
 - THDA staff will assign each eligible application an MTBA Score per Section 8-B of



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the 2026 MTBA Program Description. Eligible applications will be sorted into the priority groups specified in Section 9, then ranked according to MTBA Score.

- Round ranking information is posted on the [MTBA Program Page](#).

10. What fees are due upfront?

- MTBA Initial Application Fee and LIHTC Application Fee are due at the time of submission.
- Commitment Fee, Incentive Fee, and 42(m) Letter Fee will be due at time of Firm Commitment execution.
- Fee amounts and wiring instructions can be found in 2026 MTBA PD Section 11 and 2026 THDA LIHTC QAP Section 4.

11. Is there a deadline to close on firm commitments?

- Yes, applicants select either a 90 day or 120 day term for closing at the time of initial submission.
- Failure to close bonds within the chosen timeframe will result in a surrender of the Incentive Fee, which could otherwise be eligible for a refund after 8609 issuance per Section 11-G of the 2026 MTBA Program Description.
- Round 2 applications may only have the option of a 90 day closing term depending on the timing of the Round 2 Initial Submission Application Window.

12. How do you request supplemental bonds?

- Supplemental bond requests are subject to the requirements listed in 2026 MTBA Program Description Section 13. Minimum document requirements can be found in Section 6-B and fee requirements in Section 11-F.
- Section 3 of the THOMAS User Manual provides instructions for submitting the supplemental bond request in THOMAS.
- The availability and allocation of supplemental bonds is determined by the prioritization of the Supplemental MTBA Requests group as outlined in Section 9 of the 2026 MTBA Program Description.

13. How will declined bond authority be made available?

If an applicant declines awarded bond authority, the awarded amount will either be extended to the next-ranked qualified application that can be funded with the available



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amount or made available in Round Two based on THDA's discretion.

14. Are separate LIHTC and MTBA Disclosure forms required?

No, all applications are to use the 2026 Disclosure Template.



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2026 Competitive Low Income Housing Tax Credit

1. When will the registration period for Competitive LIHTC applications begin?
THDA will open registration at least two business days before the editing period.
2. When will the editing period for Competitive LIHTC applications begin?
The Initial Application Submission Window opens March 20, 2026.
3. When will the editing period for Competitive LIHTC applications end?
The Initial Application Submission Window closes at 4:30 PM Central Time April 16, 2026.
4. What portions of the 2026 QAP are applicable to the 9% Competitive Cycle?
2026 LIHTC QAP Part I and Part II.
5. What is considered evidence of Design Development Status for scoring purposes?
 - Design Development Status evidence must demonstrate the degree to which an architect has been engaged in the design process (does not necessarily have to be stamped or percentage progress drawings.)
 - Applicants are encouraged to upload a statement to the Narrative folder to further explain the context and progress of scoring items.
6. What is considered evidence of Water & Sewer Availability Status for scoring purposes?
 - Sewer & Water Availability Status evidence must include letter from utility provider that the service is available at site perimeter.
 - If utility infrastructure does not touch but is within a reasonable distance from perimeter, provide an explanation of the ready availability of services including estimated costs and timeline to extend infrastructure to site.
 - Applicants are encouraged to upload a statement to the Narrative folder to further explain the context and progress of scoring items.
7. What is considered evidence of Financial Readiness to Proceed for scoring purposes?
 - Letters of Intent listing terms for discussion purposes do not qualify. Commitment letters (firm or conditional), loan agreements, and grant agreements qualify.
 - Deferred developer fee does not qualify. Deferred developer fee will be omitted from



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both the numerator and denominator of the percentage of dollars committed equation.

- Applicants are encouraged to upload a statement to the Narrative folder to further explain the context and progress of scoring items.

8. How is Financial Readiness to Proceed calculated and what is the intention behind this scoring item?

The score is calculated as $\frac{\text{Committed Permanent Funds} - \text{Deferred Developer Fee}}{\text{NonEquity Sources} - \text{Deferred Developer Fee}}$.

The intention of this item is to encourage financial feasibility earlier in the development process through commitments with permanent lenders as well as the incorporation of soft funds.

9. Do construction financing sources count toward Financial Readiness to Proceed?

No, only permanent sources are included in the numerator.

10. Would standard conditions such as receipt of the LIHTC reservation, lender underwriting and due diligence, or market interest rate changes disqualify a lender commitment from inclusion in the Financial Readiness to Proceed numerator?

No, permanent debt may be subject to these standard conditions and qualify to be included in the Financial Readiness to Proceed numerator. THDA retains the discretion to determine whether a financing commitment is genuinely ready to proceed or solely exploratory.

11. Could non-financial assets such as donated land or materials, or discounts such as the PILOT be included in the Financial Readiness to Proceed numerator?

Non-financial assets that would be represented as part of development costs (note that the denominator incorporates Actual Cost rather than Eligible Basis) will not contribute to the Financial Readiness to Proceed score as they would be present in both the numerator and denominator if included.



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2026 MTBA and Competitive Low Income Housing Tax Credit

1. Can I create a test application in THOMAS?

No, THDA does not approve Owner/Admin access for applications that are not intended to be submitted.

2. Can I give my application a placeholder name?

The Project Name on the THOMAS application must be the complete and correct intended name of the development. This Project Name is used in drafting documents throughout the application process.

3. Who should I contact for assistance?

- Contact TNAallocation@thda.org with application questions or to subscribe to TN Allocation update emails.
- After the submission application window ends, please contact the allocation coordinator assigned to the application.

4. Will THDA host a 2026 Application Workshop?

No workshop is currently planned. Reach out to TNAallocation@thda.org for application assistance.

5. Are THDA Ownership Entity and Developer Entity Attachments required?

- Yes, the applicable Ownership Entity Organizational Breakdown and Developer Entity Organizational Breakdown (Attachment 15A/B/C and Attachment 16A/B/C) are required for all applications.
- The THOMAS Organizational Breakdown screen must also be completed with the required information for all entities and individuals in the developer and ownership organizations.

6. Is there an expiration date for documents?

Unless otherwise indicated in the applicable QAP and/or Program Description, documents should be no older than six (6) months from the date of application.

7. What are the primary issues listed in evaluation notices?

- Missing documentation
- Documentation uploaded to incorrect folders, especially Miscellaneous
- Conflicting information between the application and third-party reports
- Incomplete documentation
- Questionable financial assumptions



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8. Who receives THOMAS notifications?

THOMAS only sends emails to Primary and Alternate contacts. Contacts may be updated when the application is in an Editing state. Advise THDA if a Primary or Alternate contact leaves the company.

9. Can the Minimum Set-Aside Election be changed?

Per Section 6-B-5 of the 2026 LIHTC QAP, applications proposing rehabilitation of prior 40/60 Test Housing Credit Developments may submit a waiver request to THDA explaining an intention to propose the Income Average Test. No other changes to the Minimum Set-Aside Election may be made.

10. Are Narratives required?

- Applicants are required to provide a short narrative about the proposed development on the General Information screen. Additional Narrative content may be uploaded to the Narrative folder.
- Applicants are strongly encouraged to provide as much detail as possible, including relevant context and a detailed scope of the proposed development.

11. Are pre-development meetings available?

Applicants may reach out to Multifamily Programs staff at any point in the year to discuss a proposal before submission.

12. The 2026 LIHTC QAP Section 6-A-3-b indicates an option for a letter from the relevant official with assurance that zoning/PUD review will be complete by time of award process, when would zoning review need to be complete?

- For MTBA recipients, evidence of zoning approval is due at the Firm Commitment/42(m) letter issuance.
- All applicants must have proper zoning evidence uploaded to THOMAS by the time of the Final Notice.

13. Will staff approve CCRPs before application?

Staff cannot approve CCRPs before application submission. Review the definition of CCRP provided in Section 2 of the 2026 LIHTC QAP to determine CCRP eligibility.



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14. Is there a list of eligible CCRPs?

THDA does not maintain a list of eligible CCRPs. Review the definition of CCRP provided in Section 2 of the 2026 LIHTC QAP to determine CCRP eligibility.

15. Can all of my documents be uploaded to Miscellaneous?

To ensure documentation is correctly labeled and reviewed timely, upload documents to the appropriate THOMAS folder at all points in the application process. Uploading documents, including updates and corrections, to Miscellaneous instead of the specific intended folder may result in delays or findings to correct the error. Documents may be uploaded to open THOMAS folders even when the application is not in Editing.

16. Why is it important to review THOMAS screens before Validation & Submission?

- Ensure that outdated information has been updated at submission. Findings will be issued for inconsistent information.
- For instance, the Site Information screen should reflect both Level One and Level Two site control documentation and the Organizational Breakdown screen should reflect the entities and individuals executing documents on behalf the ownership entity.

17. Why is it important to review all buildings in THOMAS Buildings & Units?

- The Buildings & Units screen flows directly to Compliance after the application process is complete. Review all physical addresses and unit numbers before submission at each stage of application.
- If a building has no residential units, refer to the instructions for a stand-alone building in the [THOMAS Manual](#).
- If there is any discrepancy in the Buildings & Units information for an existing development, notify THDA for correction.

18. Why is a Compliance Verification Document folder appearing?

In the event that any individual listed in the proposed ownership or developer entity is no longer active in any development listed, supporting documentation to evidence the prior ownership or developer entity involvement is required. Most examples involve the sale of an existing LIHTC development.

19. What is the Compliance Verification screen?

This step requires Compliance review of previously awarded applications. In 2025 the Compliance screen was expanded for applicants to list pipeline developments under construction and awaiting closing. The THOMAS Manual provides instructions for completion.



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20. What is Multi-Factor Authentication?

As of November 1, 2024 THOMAS requires all Multi-Factor Authentication for all users. Refer to [this memo](#) for instructions.

21. What do messages on the Validation page mean?

- Green checks indicate that all requirements have been met; yellow triangles identify possible errors but will not prevent submission; a red X identifies an issue that must be resolved before submission.
- Applicants are strongly encouraged to **run validations early** to prevent submission delays.

22. Is an Affirmatively Furthering Fair Housing Marketing Plan (AFFHMP) required?

- Yes. At Initial Application a signed statement must be provided certifying that the Owner will comply with AFFHMP requirements.
- Competitive applications must provide a copy of the Marketing Plan with the Carryover Allocation Application.
- MTBA applications must provide a copy of the Marketing Plan along with the closing documents at the time of bond closing.
- Per Section 10-A-1 of the 2026 LIHTC QAP, the AFFHMP must include the following information:
 - a. Owner's analysis to understand the development's housing market demographics for the area
 - b. Identified impediments to fair housing choice within such area and underserved populations or populations that are least likely to apply to live in the development
 - c. Marketing efforts Owner has developed to take appropriate actions to overcome the effects of any identified impediments to ensure a diverse applicant pool and resident population. Such marketing efforts should be beyond usual methods of advertising; and
 - d. Owner's plan to maintain records reflecting the analysis and actions under the Affirmative Fair Housing Marketing Plan

23. How soon will the LURC be available?

The Owner should request a draft of the Land Use Restrictive Covenant for review at least sixty (60) days prior to closing by emailing the allocation coordinator assigned to the application and copying sblack@thda.org. Allow 30 days after sending the request for the LURC to be provided for your review. Include the following information in the LURC request:



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- a. Preferred Ownership Signature Block prepared by the Attorney
- b. Word document or text file of the legal description
- c. PILOT Lease Agreement, if a PILOT is being utilized
- d. Name and email of the Owner's Attorney
- e. Name and email of all individuals needing to review LURC draft
- f. Confirmation of any riders that will be needed

24. How do I request a waiver?

At Initial Application, select Action Requests, then Waiver on the top frame of THOMAS. Upload all relevant documentation to the Waiver Request folder.

25. Are there construction requirements?

Refer to [THDA Minimum Design Standards](#).

26. What happens after MTBA or LIHTC equity closes?

After closing documentation is uploaded to THOMAS, the primary and alternate contacts will receive an email generated by THOMAS regarding the Pre-Construction Meeting. Consult [THOMAS Manual](#) Section 6 for Construction module information.

27. When can the Final Application be submitted?

Once construction completion reaches 70%, THOMAS will open the Final Application Editing status. Consult [THOMAS Manual](#) Section 8 for Final Application information. Cost certification may be completed in THOMAS.

28. How do I get approved to edit the application?

- The user in the Owner/Admin role that creates the application is approved by THDA; all other users are approved by the Owner/Admin.
- Each application can only have one Owner/Admin at a time.

29. What happens if the Owner/Admin changes?

Reach out to THDA to process the change of Owner/Admin to another individual affiliated with the ownership entity.

30. Is a draft partnership agreement required?

Only for competitive applicants applying in the Public Housing Authority General Priority Category or Non-Profit Allocation.



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