



The Institute for Professional and Executive Development, Inc.

HISTORIC TAX CREDIT DEVELOPER'S CONFERENCE

February 5-6, 2009 | Miami Beach, FL

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- ❖ IRS Regulation 1.48-12: Qualified Rehabilitation Building
- ❖ *Historic Rehabilitation Tax Credit: An Overview by Nixon Peabody LLP*
- ❖ *Historic Rehabilitation Tax Credit: The Tax Basics* by Herbert F. Stevens, Esq., Nixon Peabody LLP
- ❖ Internal Revenue Code Section 168(h): Tax Exempt Use Property
- ❖ IRS Temporary Regulations 1.168(j)-1T: Questions and Answers Concerning Tax-Exempt Entity Leasing Rules

II. Working with the National Park Service (NPS) and the States on Tax Act Projects

- ❖ Historic Preservation Certification Application, Parts 1, 2 and 3 from the National Park Service
- ❖ Late Submission of the Historic Preservation Certification Application by Mark Primoli and Tom Gavin
- ❖ 36 CFR Part 67 – Historic Preservation Certifications, Pursuant to Sec 48(g) and Sec. 170(h) of the IRS Code of 1986

III. Understanding Current Deal Structures

- ❖ *Structuring Historic Rehabilitation Tax Credit Transactions* by Kenneth A. Alperin, Esq., Nixon Peabody LLP
- ❖ *Use of Rehabilitations Tax Credit by Lessees* by Mark Primoli, Internal Revenue Service
- ❖ Comparison of Business Entities by David Kavanaugh, Esq., Nixon Peabody LLP

IV. Washington Update

- ❖ Tax Credit Alert: “Bailout Bill” includes reauthorization of the New Markets Tax Credit Program and explanation of the Historic Tax Credit, October 28, Nixon Peabody
- ❖ Historic Tax Credit Alert: New Housing Bill Includes significant changes that affect the Historic Tax Credit, July 2008, Nixon Peabody

V. Recent Innovations in Twinning New Markets Tax Credits (NMTC) and HTCs:

- ❖ New Markets Tax Credit Memo, September 2006, Nixon Peabody LLP
- ❖ IRS Notice 2002-64 Federal Tax Benefits

VI. Reuse of Historic Buildings for Affordable Housing: The State of The Art

- ❖ *The Low-Income Housing Tax Credit Program* by Richard S. Goldstein, Esq., Herbert F. Stevens, Esq., James F. Duffy, Esq., Thomas A. Giblin, Esq., and Molly R. Bryson, Esq., Nixon Peabody LLP
- ❖ *Differences Between The Historic Rehabilitation Tax Credit and The Low-Income Housing Tax Credit* by Andrew S. Potts, Esq., and Forrest David Milder, Esq., Nixon Peabody LLP

❖ *Historic Preservation and Affordable Housing: The Missed Connection* by Donovan D. Rypkema, National Trust for Historic Preservation

VII. How Easy it is to be Green (and an HTC Project)?

- ❖ LEED Green Building Rating System for New Construction and Major Renovations, Version 2.1, November 2002
- ❖ Cost and Benefits of Green Building, Enterprise Community Partners, Inc
- ❖ Article: “Amory Renovation Shows City at its Best”. The Oregonian; September 30, 2006; Section B: EDITORIALS, Page 4.
- ❖ Report: “Portland Armory: New Markets Tax Credits: Community Impacts” Report by Portland Family of Funds Holdings
- ❖ Article: “Historic Preservation and Green Building: A Lasting Relationship” with sidebar “Considerations for Green Building and Historic Preservation” / Environmental Building News, January 2007
- ❖ Article: “The Greenest Building Is...One That Is Already Built” by Carl Elefante, AIA, LEED AP / Forum Journal, Summer 2007
- ❖ Article: “Finding Common Ground” by Kim O’Connell / Traditional Building, June 2007

VIII. (Re)interpreting the Secretary’s Standards: The NPSAB Report One Year Later

- ❖ Making a Good Program Better, Final Guidance and Implementation of National Park System Advisory Board Recommendations for the Federal Historic Rehabilitation Tax Credit Program, December 2007
- ❖ Report: “Federal Historic Rehabilitation Tax Credit Program - Recommendations for Making a Good Program Better” A National Park System Advisory Board Report, September 2006

IX. HUD Update: Twinning HTCs and Federal Mortgage Insurance

- ❖ Memo: Draft Policy and Procedures on Multifamily Mortgage Insurance Applications Involving Master Lease Ownership Structures, U.S Department of Housing and Urban Development, March 2008
- ❖ Rider to Regulatory Agreement Multifamily Housing Projects HUD-92466, Owner
- ❖ Rider to Regulatory Agreement Multifamily Housing Projects HUD-92466, Residential Tenant
- ❖ Rider to Regulatory Agreement Multifamily Housing Projects HUD-92466, Commercial Tenant
- ❖ Rider to Regulatory Agreement Multifamily Housing Projects HUD-92466, Master Tenant
- ❖ Special Firm Commitment Conditions Document
- ❖ Memo: Draft Policy and Procedures on Multifamily Mortgage Insurance Applications Involving Master Lease Ownership Structures, Sandwich Lease Policy, U.S Department of Housing and Urban Development, March 2008