

# 2025 ORCA with LIHTC Training Q&A

March 6, 2025

## **If we have already submitted an ORCA intake form, are we required to submit additional items?**

Please [email the Application Team](#) to confirm the status of the intake submission.

## **Can a developer have more than two active projects in a step if a separate sponsor is the lead on the projects?**

Whether they are a lead or co-developer, entities may have up to two projects in any one application step at a time (Impact Assessment, Financial Eligibility, and Commitment).

## **Can we request a closing date at the same time as the application submission?**

Closing dates will be assigned when applications complete the Financial Eligibility step of the ORCA process.

## **How are you treating LIHTC projects that will close in early 2026? Can we keep moving forward and assume we will receive 2026 LIHTC funding?**

Applications for 4% LIHTC/PAB for projects that will close after 2025 will be reviewed; however, OHCS staff will prioritize reviewing applications for projects that can close in 2025.

## **If a project is requesting LIHTC with gap sources (LIFT, PSH, for example), how should that be signified?**

Projects requesting LIHTC with gap resources from OHCS will show this in the Impact Assessment proforma.

## **When is the project placed in intake, now or March 13?**

Projects are placed in intake as soon as the intake form is submitted.

**Will the current administration allow these set-asides to continue, or are they pulling tax credit allocation from the state?**

The Governor has signed the QAP, and it is now applicable. We encourage you to contact the state's federal delegation if you have questions about the federal government or its intentions.

**Will this Zoom recording be available for viewing at a later time?**

The [recording](#) and [slides](#) are posted on the [Get Help with ORCA page](#).

**If we have already identified the need for 9% credits in a previous intake form, will we be required to submit an intake form again?**

If you have already submitted an intake form, you will not be required to submit another one. Please reach out to the Applications Team to ensure your intake form is marked for 9% LIHTC.

**Can you define or provide a reference to the definition or what is required for a 'permit ready' letter in the Commitment phase of ORCA? i.e. if a project has been submitted for building permit, but has not yet received it at the Commitment step?**

In order to connect you with the best available program expert, please [submit this question to the ORCA Question & Feedback Portal](#).

**Is the project-based vouchers (PBV) for preservation requirement just for 9% applications?**

There is no requirement for project based vouchers for either 9% or 4% LIHTC projects to apply for funding. However, it is a prioritization factor for preservation projects that are applying for 9% LIHTC.

**Is there a maximum per project amount of annual 9% LIHTC that can be requested?**

Applicants can apply for up to \$2 million in annual 9% LIHTC per project.

**For LIHTC projects, are you considering HUD's Total Development Cost (TDC) limits?**

In order to connect you with the best available program expert, please [submit this question to the ORCA Question & Feedback Portal](#).

**Can you explain how the 10-day application cure process works in regards to an application's place on the waitlist? Is it correct to say if the developer fixes the issue within 10 days, they maintain their spot on the list?**

There is a single 10-day cure period for applicants to satisfy standards, and OHCS has an additional 10 days to evaluate the information submitted during the cure period. If, after responding to feedback and clarification, the project is determined not to meet standards, the project will be sent back to impact assessment for cures and lose its original submission date.

**Is there a scenario where a project requesting a smaller amount of LIHTC/PAB would move ahead of one with a larger request if the amount needed by the smaller project (not enough for the larger one) became available?**

This may be a possibility; however, without knowing more about the applications that will be received, it's not possible to give a reliable answer to this question at this time.

**Is the 10-day cure a one-time opportunity? In other words, if we don't correct all the issues to OHCS satisfaction, do we get another 10-day cure period or do we have to restart the process?**

There is a single 10-day cure period for applicants to satisfy standards, and OHCS has an additional 10 days to evaluate the information submitted during the cure period. If, after responding to feedback and clarification, the project is determined not to meet standards, the project will be sent back to impact assessment for cures and lose its original submission date.

**Will the new manual have additional guidance on what should be included when calculating the deferred developer fee?**

Please [refer to the ORCA manual](#) for more information.

**Is average income still tied to bedroom count?**

No, this requirement was removed with the updated policy. The language gives direction to the developer that there must be consideration given when assigning income levels to different unit sizes to ensure all household types/sizes are considered.

**When new resources are made available from the state legislature, how will OHCS determine what funds are matched with LIHTC, and what funds are associated with Non-LIHTC funding. And does the waitlist type (LIHTC, or Non-LIHTC) or depth impact decisions on allocations of the future funding?**

One benefit of ORCA is that the funding process already exists, and funding can be added as it becomes available during the legislative session. Once OHCS knows what funding it is receiving for the 2025-27 biennium, it will consider resources received and waitlist needs, as well as other factors in its planning, analysis, and decision-making for utilization of the funding.

**We were told just recently that we could not have more than one project in any process at one time, now it is two?**

For ORCA, it is two projects per step. If a project is on the waiting list, it counts as one of the developer's projects in the impact assessment step.

**With HUD staffing being cut by 40-60%, will OHCS allow extra time to navigate subsidy layering reviews, environmental reviews, etc.?**

For 4% LIHTC, PAB is allocated on an annual basis to the state and in order to maximize our resources projects need to close this year. OHCS will work with partners to push towards meeting those timelines to the degree possible. We are working closely with partners at HUD and determining what the next steps should be in what is currently a very fluid environment.

**Is there guidance on an amount of maximum LIHTC per project in the QAP?**

For 9% LIHTC projects, the maximum LIHTC per project is \$2 million. For 4% LIHTC projects, the maximum LIHTC per project is determined by the project structure.

**When does OHCS plan to release the waitlist for the submitted 4% projects that can close in 2025?**

HSC Waitlist is published each month on the ORCA web pages. This is updated, generally, the week after each HSC.

**Can you please repeat what specifically needs to be completed during the six-week period (March 13 - April 24)? Is it just the intake? The intake and 9% form? The entire Impact Assessment? Also, is there a 4% form at intake similar to the 9% form?**

The 9% Request Form opened March 13 and will be open for six weeks. Applicants must also have submitted an ORCA intake form in addition to the 9% request form, so OHCS encourages applicants, who have not already done so for their projects, to do so as soon as possible.

[Information on what needs to be submitted during the 6-week 9% Request Form window can be found here.](#) There is no additional request form needed for 4% LIHTC beyond the intake Form. WorkCenters are open now for 4% LIHTC projects.

**How will the 4% waitlist work in regard to future funding. I.e. will projects be funded on a rolling basis or at a certain time i.e. January 2026 for projects moving forward in 2026? In thoughts on how that will work is appreciated!**

Once we've assessed our priority of 2025 allocations for PAB, the intent is not to wait until 2026 but to continue to build a managed queue of projects that have passed the ORCA Impact Assessment standards review and are in line for resources when available.

**Will you be going through the content of the 9% request form?**

[The 9% Request Form can be found here.](#)

**For 9% LIHTC: After submitting the request form, is it first come, first serve starting March 13?**

The 9% Request Form is open for submission from March 13, 2025 - April 24, 2025. The form includes mandatory thresholds, supplemental criteria, and tiebreakers. The information submitted in the 9% Request Form allows OHCS to conduct a selection process for projects that includes eligibility reviews and, if necessary, rank projects based on the tiebreakers in the QAP. [The QAP can be viewed here.](#)

**Is there a path to getting 1-on-1 help as a new culturally specific mission-driven/non-profit housing provider?**

Please [email the Technical Advisors](#) for assistance.

**If project is on the waitlist for LIFT will it also be waitlisted for LIHTC, and vice versa?**

In order to connect you with the best available program expert, please [submit this question to the ORCA Question & Feedback Portal](#).

**Once all resources are fully subscribed, what will happen to the wait list? will these Projects maintain their place indefinitely or will all projects have to re-apply next year?**

In order to connect you with the best available program expert, please [submit this question to the ORCA Question & Feedback Portal](#).

**For the 9% Request Form do projects listing federal sources need to verify that those are committed or just that they have applied / are applying?**

We're asking that they be applied for, if possible. We understand this might be early in the process, and applicants might not have received an award or formal commitment yet. However, projects must have a budget with identified sources to complete the Impact Assessment application, so we require you to have some surety from your local jurisdiction or another funder in the form of a conditional or even informal commitment at that time if a formal commitment is not available. If the funding jurisdiction requires that you get approval for a 9% Request Form first, as we understand some jurisdictions might require, we will be asking for more detail and following up to understand your situation.

**A mandatory criteria for LIHTC is alignment with the OHNA process, including Housing Production Strategies (HPS). It appears that the Housing Productions strategies, for most jurisdictions, are not due until after 12/31/2025. Can you please clarify how this might impact this criteria for these jurisdictions?**

OHCS wants to ensure the project aligns with what has been identified as a need in the community via the OHNA, and, if an HPS exists, that they are in

alignment with that. This can be as straightforward as identifying that the income level you are going to be serving has been [shown as a need through the OHNA dashboard](#).

**Does the department has a sense for when the review of 4% LIHTC applications for the ability to achieve 2025 closing will be conducted? Is it going to be a rolling first come, first serve? Or Will the department conduct a more wholistic review later at a date certain?**

4% LIHTC reviews will happen on a rolling basis, and applications planning to close in 2025 will be prioritized for review and HSC approval recommendation before other 4% LIHTC applications.

**Will the details of the 9% Request Form be made available as part of the training?**

[The 9% Request Form opened March 13 and closes for submission on April 24.](#)

It reflects the criteria outlined in the QAP. Criteria are intended to be high level understanding of what the project's characteristics will be.

**When will projects find out if they are selected for the 4% round?**

4% LIHTC resources are available through the ORCA, so awards will be made on a rolling basis until resources are fully committed. At that point, projects can either choose to wait until more PAB is available or seek other alternative funding opportunities. 4% LIHTC work centers are open now for applicants to begin completing. Once an applicant submits a complete application, it goes through the standard ORCA steps, starting with the Impact Assessment standards review, which can take up to 30 days. If cures or clarification are needed before the project meets all standards, the review can take more than 30 days. There isn't a specific timeline, as it depends on who applies and how much PAB and gap funding remain. The timing for each project depends on the specific project and application, including when the complete Impact Assessment application is submitted and if there are cures needed, as well as what gap resources are being requested and the availability of those resources.

**Can the applicant decide whether to be in the preservation round or not with a rehab tax credit project? Could an applicant elect to not be in preservation (we don't think it will score well) and go after a set aside instead?**

In order to connect you with the best available program expert, please [submit this question to the ORCA Question & Feedback Portal](#).

**What criteria will the department be utilizing to determine a project's readiness to close in 2025 with 4% resources for a project to be prioritized?**

The first criterion would be whether or not a 4% project can close before Nov. 20, 2025. The next sorting criteria would be time of application submission and how it meets ORCA standards.

**For the 9% Request Form, applicants may need to submit justification documentation. Will there be a work center or portal for uploading, or are we putting together a big pdf?**

You will be able to upload these supplemental documents directly to the 9% Request Form for submission.

**Are 4% LIHTC also going live on March 13?**

The 4% WorkCenters are now open. If you have questions about access to a 4% WorkCenter, please [email the Applications Team](#).

**What would the placed in service date be for the upcoming 9% LIHTC round?**

OHCS forward allocates and will allocate 2026 Credits for the 9% round this year. Projects would have to reach carry-over by the end of 2026 at the latest. Upon completing carry-over, projects have to be placed in service by the end of 2028. Projects selected to move forward will be expected to begin work on their Impact Assessment application immediately and, from there, will be subject to all ORCA requirements, including timelines.



**Will all issues with projects be communicated through Procorem or how will OHCS let developers know if there is an issue with the application?**

Once a project receives a WorkCenter and enters standards review, all communication regarding cure or clarification needs will occur within the Procorem WorkCenter.

**Is it possible to develop a flow chart that includes all of these other steps and forms along the way for each funding path?**

Please [provide this feedback here](#).

**Let's assume it all goes well and there is not a cure process, when do you believe the notification of award or funding would take place for 2025 projects?**

It depends on when an application in Impact Assessment has been submitted and when the review process takes place. Projects that move quickly through the Impact Assessment Standards review could go to the Housing Stability Council for recommendation as early as the May 2025 meeting.

**Is there a required timeline for when we need to finish the rest of the ORCA application after the 9% Request Form is successfully submitted for 2025?**

9% applications must meet ORCA timeline requirements. We expect projects to begin working on Impact Assessment applications after being selected, and upon approval of conditional resources by Housing Stability Council, the timing requirements start as it goes through the ORCA steps.

**What is the best way to figure out the steps that need to be completed in the WorkCenter for a 4% application?**

The best way would be to [review the ORCA manual](#).

**Will the 9% Request Form be able to be saved so you can keep working on it?**

That is correct; Smartsheet cannot save and return. The 9% Request Form is intended to be relatively straightforward and easy to fill out in one sitting.

**A mandatory criteria for LIHTC is alignment with the OHNA process, including Housing Production Strategies. Housing Productions Strategies for most jurisdictions are not due until after Dec. 31, 2025. Can you please clarify how this might impact this criteria for these jurisdictions?**

OHCS wants to ensure that either the OHNA or your local Housing Production Strategy (HPS) has identified a need for this project type, whether that is AMI levels or population served. If an HPS is available, we want the applicant to demonstrate an understanding of that and how it will connect to the project. If it is not available, we encourage you to look at the dashboard for the Oregon Housing Needs Analysis to see what the jurisdiction the project is being built in has identified there and how it aligns with your project proposal.

**Intake forms don't say you have to do them all at a specific time or it disappears. At least that is what has happened to me.**

That is correct; Smartsheet cannot save and return. The 9% Request Form is intended to be relatively straightforward and easy to fill out in one sitting.

**How quickly after a project meets impact assessment and the financial review will a project go to Housing Stability Council? Can a 9% LIHTC project reasonably close in 2025 if we are not notified until June-July?**

The timing for notification for the 9% LIHTC Request Form depends on the volume of applications received, and projects move through the Impact Assessment at their own pace within the required time constraints of the 9% LIHTC program. 9% LIHTC projects do not have to close in 2025.

**Can you clarify that again, closing for PABs are end of October?**

OHCS will allow closing dates for projects with 2025 PAB until Nov. 20, 2025. No 2025 closings will be scheduled after this date.

**Is there an anticipated schedule for OHCS receiving future allocations of 4% PAB?**

OHCS receives PAB allocations at the beginning of every calendar year on Jan. 1. The state legislature decides the amount of PAB allocated to OHCS.

**Can multiple people from an applicant get access to the portal?**

Yes, access can be provided to multiple users.

**Is there an approximate number of projects OHCS is anticipating to fund for this round of 4% and also 9%?**

We won't know the answer to this question until applications are submitted.

**You mentioned that the questions for the 9% Request Form are from the information in the QAP. Is this the mandatory and supplemental criteria starting on page 13?**

Yes, the information starts on page 13 of the QAP.

<https://www.oregon.gov/ohcs/rental-housing/housing-development/development-resources/pages/qualified-allocation-plan.aspx>

**Will OHCS consider taking over Subsidy Layering Review (SLR) from HUD given their staffing cuts?**

We are in active conversations with our partners at HUD; this is a dynamic process.