

Relieving the Poor and Distressed

IRS REVENUE PROCEDURE 96-32 SAFE HARBOR

20% @ 50% (or **40%**
OF AREA MEDIAN INCOME @ **60%**)

75% @ 80%

**ONE-YEAR
TRANSITION PERIOD**



**RENT
RESTRICTIONS**

Lessening burdens of Government

Revenue Rulings 85-1 and 85-2

Requirements:



The organization conducts activities that a governmental unit considers to be its burden.



The activities actually “lessen” such governmental burden.

This is always
an “all facts and
circumstances” test

NO Safe
Harbor