## Section 42.—Low-Income Housing Credit

Low-income housing credit; satisfactory bond; "bond factor" amounts for the period April through June 2001. This ruling announces the monthly bond factor amounts to be used by taxpayers who dispose of qualified low-income buildings or interests therein during the period April through June 2001.

## Rev. Rul. 2001-19

In Rev. Rul. 90–60, 1990–2 C.B. 4, the Internal Revenue Service provided guid-

ance to taxpayers concerning the general methodology used by the Treasury Department in computing the bond factor amounts used in calculating the amount of bond considered satisfactory by the Secretary under § 42(j)(6) of the Internal Revenue Code. It further announced that the Secretary would publish in the Internal Revenue Bulletin a table of "bond factor" amounts for dispositions occurring during each calendar month.

Rev. Proc. 99–11, 1999–1 C.B. 275, established a collateral program as an alternative to providing a surety bond for taxpayers to avoid or defer recapture of the low-in-

come housing tax credits under § 42(j)(6). Under this program, taxpayers may establish a Treasury Direct Account and pledge certain United States Treasury securities to the Internal Revenue Service as security.

This revenue ruling provides in Table 1 the bond factor amounts for calculating the amount of bond considered satisfactory under § 42(j)(6) or the amount of United States Treasury securities to pledge in a Treasury Direct Account under Rev. Proc. 99–11 for dispositions of qualified low-income buildings or interests therein during the period April through June 2001.

|                               |                                                                                                                  |                         |                         |                         | Table 1                 |                         |                         |                         |                         |                         |                         |
|-------------------------------|------------------------------------------------------------------------------------------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
|                               |                                                                                                                  |                         |                         | R                       | ev. Rul. 20             | 01–19                   |                         |                         |                         |                         |                         |
|                               | Moı                                                                                                              | nthly Bond F            | Factor Amo              | unts for Di             | spositions l            | Expressed A             | As a Perce              | ntage of To             | otal Credits            | 8                       |                         |
|                               | Calendar Year Building Placed in Service or, if Section 42(f)(1) Election Was Made, the Succeeding Calendar Year |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |
| Month of<br>Disposition       | 1987                                                                                                             | 1988                    | 1989                    | 1990                    | 1991                    | 1992                    | 1993                    | 1994                    | 1995                    | 1996                    | 1997                    |
| Apr '01<br>May '01<br>Jun '01 | 20.36<br>20.36<br>20.36                                                                                          | 37.41<br>37.41<br>37.41 | 51.71<br>51.71<br>51.71 | 63.80<br>63.80<br>63.80 | 74.03<br>74.03<br>74.03 | 75.46<br>75.25<br>75.05 | 77.76<br>77.54<br>77.32 | 79.98<br>79.75<br>79.52 | 82.22<br>81.98<br>81.75 | 84.67<br>84.42<br>84.18 | 87.27<br>87.01<br>86.76 |

|                         |                                                                                                                  | 41 5 17      |           | Table 1 (cont'd) Rev. Rul. 2001–19                                |  |  |  |
|-------------------------|------------------------------------------------------------------------------------------------------------------|--------------|-----------|-------------------------------------------------------------------|--|--|--|
|                         | Mor                                                                                                              | ithly Bond F | actor Amo | ounts for Dispositions Expressed As a Percentage of Total Credits |  |  |  |
|                         | Calendar Year Building Placed in Service or, if Section 42(f)(1) Election Was Made, the Succeeding Calendar Year |              |           |                                                                   |  |  |  |
| Month of<br>Disposition | 1998                                                                                                             | 1999         | 2000      | 2001                                                              |  |  |  |
| Apr '01                 | 90.15                                                                                                            | 93.01        | 95.60     | 97.21                                                             |  |  |  |
| May '01                 | 89.87                                                                                                            | 92.71        | 95.31     | 97.21                                                             |  |  |  |
| Jun '01                 | 89.61                                                                                                            | 92.44        | 95.05     | 97.21                                                             |  |  |  |

For a list of bond factor amounts applicable to dispositions occurring during other calendar years, see: Rev. Rul. 98–3, 1998–1 C.B. 248, and Rev. Rul. 2001–2, 2001–2 I.R.B. 255. For dispositions occurring during the period January through March 2001, see Rev. Rul. 2001–10, 2001–10 I.R.B. 755.

## DRAFTING INFORMATION

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