

State: IDAHO (QAP 2014)		Idaho Housing and Finance Association
Measure		Evidence
HOUSING LOCATION: Site and Neighborhood Standards		
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	[Under preference points, though no explicit point value assigned] Sponsors are expected to disperse units targeted for 30%, 35%, 40%, and 45% AMI households throughout the development to the extent possible taking into consideration other programmatic requirements. Allocating such units so that one building is 100% occupied by households at 30%, 35% 40%, and 45% of AMI is not recommended (p. 27).	
A2. Scoring that discourages racial and economic concentration.	No.	
A3. Mandatory requirements for development in high-opportunity areas	The mandatory Market Study must include a community profile addressing employment and population growth projections (p. 53).	
A4a. Scoring that encourages development in high-income areas.	No.	
A4b. Scoring that encourages development in high opportunity areas.	✖ Up to 9 points awarded for developments located within specific distances from goods/services (defined as full grocery store, retail shopping, police/fire station, pharmacy, post office, bank/credit union, public park, education facility (lower school or higher education institution), public library, health club/recreational center, hospital/medical clinic/dental office, bus stop/transit stop, public greenbelt bike/walking path access, or a major employer (as documented in the market study). Goods/service must be within 1.5 miles driving distance in urban communities and within 3 miles driving distance in rural communities. Major employers must be within 5 miles driving distance in urban communities and within 10 miles driving distance in rural communities. 1 point awarded per category (capped at 9 points) (p. 21).	
A5. Scoring or requirements that preference siting near high-quality schools.	No.	
A6. Scoring that discourages development in distressed neighborhoods. ¹	<p>(-) Up to 11 points for developments that utilize other state and federal housing program funding sources (i.e., CDBG, USDA Rural Development 515/538, FHLB Affordable Housing Program, etc.) or receive non-related private party, Section 501(c)3, or government assistance. 3 points if other funding sources are $\geq 1.5\%$ of total development cost, 6 points if other funding sources are $\geq 3\%$ of total development cost, 11 points if other funding sources are $\geq 5\%$ of total development cost (p. 23).</p> <p>(-) [As noted in A8] 1 point for developments located within a QCT in which the development contributes to a concerted community revitalization plan (p. 27) though this a fairly weak</p>	

¹ Evidence of the inverse: preference for development in distressed neighborhoods (by overemphasizing QCT/DDA preference, preference for existing subsidized housing in distressed neighborhoods, preferences for low-income matched financing, etc.) should also be noted.

	<p>point magnitude.</p> <p>✖ [Under site selection] The Association discourages development near facilities that process or store hazardous/explosive materials or located near wetlands, floodplains, near airport runways, in high noise impacted areas, or in proximity to unprotected waterways (p. 31). No point deductions or further restrictions on this specified, though the Association does recommend that sponsors schedule a pre-approval meeting before the application deadline to address any site selection issues.</p> <p>(-) Up to a 30% increase in eligible basis will be considered for developments located in DDAs or QCTs if deemed necessary by the Association for the financial feasibility and viability of the proposed development (p. 33).</p>
A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	✖ 1 point for developments that include the use of existing housing as part of a community revitalization plan. A concerted community revitalization plan is defined as a certified urban renewal district or other city-designated geographic area located within a QCT that specifically addresses affordable housing as a goal. Documentation from the urban renewal district or the city must confirm to the Association's satisfaction that the proposed development lies within certified boundaries and meets the urban renewal district's or city's goal of providing affordable housing (p. 24, 27).
B1. Local participation in site selection is limited to statutory minimum. ²	<p>✖ Although letters of community support are permitted, the QAP states that public officials comments, if made, represent only one factor of many considerations in evaluating a proposed development and that such comments are primarily intended to assist in evidencing a need for the proposed housing (p. 15).</p> <p>✖ (-) In reviewing application cost justifications, the IHFA will be sensitive to the localized goals of the community in which the development is proposed (p. 31). [This is vague but potentially problematic.]</p>
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	✖ Submission of an Affirmative Fair Housing Marketing Plan is required to meet the Management Capacity Threshold (p. 11).
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentives language access and marketing to non-English speakers.	No.
D1. Scoring that promotes	✖ To qualify for most point categories, developments must

² Evidence of the inverse: preferences or requirements for local participation should also be noted.

Section 8 voucher access in high-opportunity areas.	attach a copy of the proposed development's Management Plan which includes a Tenant Selection Policy specifically stating that a preference will be given to potential tenants on Public Housing Authority waiting lists to the extent permitted by law (p. 21-22).
D2. Requirements for monitoring Section 8 voucher access <i>in high-opportunity areas</i> .	No.
F1. Incentives for larger family units.	✖ 3 points for developments that designate 5% of rent-restricted units to 3-bedrooms or larger for HHs earning no more than 50% AMI. Such developments must provide appropriate amenities for children and families (i.e., open space, playground, laundry, etc.) (p. 23).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (<i>outside high-poverty areas</i>).	<p>[Though not specific to the lowest-income households.] The QAP does list an Affordability threshold wherein maximum tax credit rents must be less than market rents for comparable units in the area (p. 12).</p> <p>[Preference points] 16 points for developments that are obligated to provide low-income use 25 years beyond the initial 15-year compliance period (i.e., for a 40-year low-income use obligation) (p. 27).</p> <p>✖ [Preference points] 1 point for developments with 40% AMI units (at least 2.5% of all rent-restricted units in developments with 1-50 units total; at least 5% of all rent-restricted units in developments with 51+ units). 2 points for developments with 45% AMI units (at least 5% of all rent-restricted units in developments with 1-50 units total; at least 10% of all rent-restricted units in developments with 51+ units) (p. 27). [Though this still appears to be a fairly high income threshold (?).]</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	✖ Submission of demographic and economic information on tenants residing in LIHTC-financed properties is one area of compliance monitoring (p. 45).

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: XX (Scoring systems is such that points can only be gained.)
Applications must meet a minimum threshold of 70 points to be eligible for consideration.

Fill this in.

Notes:

The required Market Threshold study must include information on the market composition between homeowners and renters, existing competing developments, income levels in the targeted market area, a community profile addressing employment and population growth projections, and a site analysis and opinion on how the site will enhance or detract from development marketability (p. 52-53). While the Market Threshold study is mandatory, these necessary pieces of information do not seem to constitute mandatory restrictions or requirements for development in certain areas (as would be otherwise noted under A1 or A3).

The only set-aside noted are for 1) non-profits (at least 25% of credit ceiling) and for rural developments (10% if credit ceiling). Neither of these are explicitly connected to desegregation/civil right. (see pg. 18-19 for more details on set-asides.)

6 points awarded for developments located in a primary market area with an overall multifamily rental vacancy rate (market and rent-restricted) of 3% or less (as documented in the market study). And 6 points awarded for developments located in a primary market area with a LIHTC rental vacancy of 3% or less (as documented in the market study) (p. 26). If one makes the assumption that vacancy rates are lower in higher-income and/or higher-opportunity, than this encourages development in high opportunity areas (as in A4a and A4b), but this assumption may be too much of a stretch.

Under the 40-45% AMI unit preference points (see G1), the QAP also states that developments should state the number of units restricted to lower rent levels (30%, 35%, 50%, 55%, 60%), however preference points will not be awarded for these units (p. 27).

OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2.
O2. Scoring that promotes units for special needs populations.	≈ 3 points for developments designed for special needs populations. This may be for a) developments that least 25% of rent-restricted units to disabled families or b) developments which provide 100% of all units for elderly persons over 62 or c) developments designed and operated for occupancy where ≥80% of units are occupied by persons 55+ provided that any marketing for the development identifies the intent to provide housing for older persons (p. 22-3).
O3. Scoring to promote home ownership.	≈ 1 point for developments intended for eventual tenant ownership after the 15-year compliance period has ended (p. 24). These developments must be single-family units, condominiums, or townhouses; intention to convert must be expressed in writing at the time of application; purchasers must occupy units as primary residences; and a comprehensive plan must be submitted at the time of application that demonstrates the feasibility of this conversion plan.
O4. Provisions affirmatively furthering fair housing laws.	≈ Fair housing is outlined and specific provisions pertaining to fair housing identified in the QAP introduction (p. 1). These include: <ul style="list-style-type: none"> • Fair Housing architectural requirements. Sponsors must obtain a certification from their architect indicating that the development meets local, state, federal laws and minimum requirements set forth in the QAP (including 1988 Fair Housing Act Amendments which specify guidelines for multifamily dwellings in regard to minimum handicapped accessibility and adaptability) (p. 4). • Submission of an Affirmative Fair Housing Marketing Plan is required to meet the Management Capacity Threshold (p. 11) – also as noted in C1. • The QAP introduction notes ID’s Analysis of Impediments to Fair Housing and Accessibility Study (2011) which provides data, analyses, and best practices for fair housing in the state but is not

	directly connected to LIHTC provisions (p. 1-2).
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