

<b>State: ILLINOIS (QAP 2013)</b>	Illinois Housing Development Authority
<b>Measure</b>	<b>Evidence</b>
<b>HOUSING LOCATION: Site and Neighborhood Standards</b>	
A1. <b>Mandatory restrictions</b> prohibiting increases in racial and economic (or low-income) concentration	≈ [Though not strongly restrictive] Evaluation of Preliminary Project Assessment (pre-Application) may consider the impact on existing or approved affordable housing projects and location in a community/municipality where Authority funding is invested in over 10% of the rental stock (p. 16).
A2. <b>Scoring</b> that discourages racial and economic concentration.	No.
A3. <b>Mandatory requirements</b> for development in high-opportunity areas	<p>≈ 17.1% allocation set-aside for AHPAA Opportunity areas in the Chicago Metro area (p. 14). AHPAA (Affordable Housing Planning and Appeal Act) is a 2003 state law that is designed to encourage local governments to incorporate affordable housing into their communities. It identifies communities with greatest shortage of affordable housing by calculating the 'affordable housing share' for all local governments in Illinois. Incentives are incorporated into the LIHTC QAP for proposed developments in communities with a low affordable housing share (presumably, many suburban - and higher-opportunity - communities) (see <a href="http://www.ihda.org/government/AHPAA.htm">http://www.ihda.org/government/AHPAA.htm</a> and <a href="http://www.hindawi.com/journals/usr/2014/787261/">http://www.hindawi.com/journals/usr/2014/787261/</a> for more).</p> <p>≈ [Though not strongly mandatory] Evaluation of Preliminary Project Assessment (pre-Application) may consider the availability of and access to appropriate public and community services and amenities (p. 16).</p>
A4a. <b>Scoring</b> that encourages development in high-income areas.	No.
A4b. <b>Scoring</b> that encourages development in high opportunity areas.	<p>≈ Up to 9 points for projects located in sites with desirable characteristics and amenities (for distance parameters, see proximity radius chart in Notes section below) (p. 53).</p> <ul style="list-style-type: none"> <li>• 2 pts. for Transit-Oriented Development (see A7)</li> <li>1 pt. each for proximity to: <ul style="list-style-type: none"> <li>• sites served by a dial-a-ride service</li> <li>• grocery store</li> <li>• public schools and senior centers</li> <li>• recreation amenities (public park, public swimming pool, etc.)</li> <li>• health services (doctor's office, health clinic, hospital)</li> <li>• government services (post office, public library)</li> <li>• social services (NAEYC-accredited daycare, workforce investment center, community college, job training program)</li> </ul> </li> </ul> <p>≈ Up to 2 points for projects in areas with a minimum number of jobs located within 2 miles but that also demonstrate a need for housing in the vicinity of jobs (p. 53-54).</p>
A5. <b>Scoring</b> or <b>requirements</b> that preference siting near high-quality schools.	Though schools are mentioned under Neighborhood Assets (see A4b), no mention is made on school quality.

<p>A6. <b>Scoring</b> that discourages development in distressed neighborhoods.<sup>1</sup></p>	<p>(-) Projects located in QCTs are eligible for a basis boost (p. 12).</p> <p>✖ [Though not explicitly scoring] Evaluation of Preliminary Project Assessment (pre-Application) may consider potential development concerns located on, adjacent to, or near the project site (p. 16).</p> <p>Applications must include a phase I environmental site assessment covering all project sites completed within 1 year prior to the Application deadline according to the Authority's Standards for Environmental Reviews and Professionals (p. 34).</p> <p>✖ (-) Up to 4 points given to the rehabilitation of existing housing (4 points when 75%+ of hard construction costs are attributable to rehabilitation). Up to 13 points for the rehab of abandoned and foreclosed single-family housing (13 points when 75%+ of hard construction costs are attributable to rehabilitation) (p. 51).</p> <p>(-) As noted in G1, up to 20 points for subsidy layering. Similarly, up to 1 point for projects containing units that are not assisted by a rental assistance contract currently but that certify a willingness to accept future state-administered operating subsidies or project-based rental assistance (should it be made available) (p. 59).</p>
<p>A7. <b>Scoring</b> or <b>requirements</b> that preference siting near mass transit.</p>	<p>✖ As noted in A4b, 2 points for transit-oriented development. Project sites must be located within the proximity radius of a fixed route transit stop defined as buses and trains serving local destinations and operating on a schedule beginning no later than 8am and ending no earlier than 6pm, Monday-Friday (p. 53).</p>
<p>A8. <b>Focus</b> on and operationalization of a neighborhood revitalization plan.</p>	<p>✖ 1 point for projects located in an area covered by a revitalization or redevelopment plan, commissioned and funded by a public entity, that includes affordable housing policy goals that will be addressed by the project (for more on include revitalization plans, see notes section) (p. 54). To qualify, application must include a letter from the public entity that administers the revitalization plan and affirm that the project will contribute to the affordable housing policy goals within the plan.</p> <p>✖ In the case of scoring ties, the third tiebreaker criteria is that projects located within a QCT and contribute to a concerted community revitalization plan will be given preference (p. 60).</p>
<p>B1. Local participation in site selection is limited to statutory minimum.<sup>2</sup></p>	<p>Applications must include a letter of local support for the project from the chief elected official of all municipalities where it is located. In cases where a letter of support is withheld, projects may include a description of the efforts</p>

<sup>1</sup> 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.

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

	taken to obtain a letter of support (p. 30-31). [Though this emphasizes local participation, it also provides an out for cases where support is lacking.]
<b>HOUSING ACCESS: Affirmative Marketing, Priority Groups</b>	
C1. Mandatory requirements ensuring affirmative marketing.	<p>≈ All projects applying for tax-exempt bonds (4% Tax Credits) must submit an Affirmative Fair Housing Marketing Plan (p. 23). [No similar mention of this for competitive 9% Tax Credits].</p> <p>As also noted in D1, projects must provide written certification that they will make on-going efforts to request that the PHA make referrals to the project or request that the PHA include relevant information about the project on any listing the PHA makes available to persons on its waiting list(s) (p. 30).</p> <p>≈ Property managers must employ staff who possess Affirmative Marketing certifications (p. 38).</p>
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentives language access and marketing to non-English speakers.	No.
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	≈ [Mandatory requirement] Applications must include the Public Housing Authority (PHA) Preference Certification which provides a written certification that the project will: 1) give preferential treatment to persons on the PHA waiting list(s), and 2) make on-going efforts to request that the PHA make referrals to the project or request that the PHA include relevant information about the project on any listing the PHA makes available to persons on its waiting list(s) (p. 30).
D2. Requirements for monitoring Section 8 voucher access <i>in high-opportunity areas</i> .	No.
F1. Incentives for larger family units.	≈ Up to 3 points for projects whose architectural design and construction includes larger units. [For non-elderly restricted projects] 1 point if 10-24.9% of units are 3+ bedrooms; 2 points if 25-49.9% of units are 3+ bedrooms; 3 points if 50%+ of units are 3+ bedrooms (p. 51).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households ( <i>outside high-poverty areas</i> ).	<p>Up to 20 points for projects with unit-based rental assistance (as opposed to tenant-based) ensuring that tenants pay ≤30% of income toward rent/utilities. Number of points is determined by type of assistance (federal/state or other), % of total units assisted, and length of remaining assistance (years) (p. 56-57). Though this is beneficial to low-income persons, such subsidy layering is also a potential negative (as noted in A6).</p> <p>≈ Up to 10 points to projects with a percentage of units restricted to HHs with incomes ≤30% AMI. (10: 20% or more</p>

	units are for 30% AMI, 7: 15%-19.99% units are for 30% AMI, 4: 10%-14.99% units are for 30% AMI, 2: 5%-9.99% units are for 30% AMI, 1: > 1 unit - 4.99% units are for 30% AMI (p. 58).
<b>REPORTING REQUIREMENTS</b>	
H1. Racial/demographic reporting requirements.	No.

### **OVERALL ASSESSMENT**

TOTAL POINTS POSSIBLE: XX (Scoring systems is such that points can only be gained.)

**Fill this in.**

#### Notes:

The Illinois Comprehensive Housing Planning Act identifies 6 underserved populations to be served by statewide housing initiatives: low-income households (particularly those <30% AMI), low-income seniors, low-income persons with disabilities, homeless persons and persons at-risk of homelessness, low- and moderate-income persons unable to afford housing near work or transportation, low-income persons residing in existing affordable housing that is in danger of being lost or becoming unaffordable (p. 11).

In addition to the AHPAA Opportunity Areas set-aside (noted in A3), other set-asides include 14.2% for the City of Chicago, 14.9% for Chicago Metro (non-AHPAA (i.e., exemption areas)), 17.4% for Other Metro areas, 20.1% for Non-Metro , and 16.3% for Statewide (p. 14).

[Relocation Requirement]. If a project involves the acquisition/rehab of a currently-occupied building, the Application must include: a current tenant profile (including HH size and income); current rent and unit schedule; in cases where proposed rents exceed current rents, an explanation of how existing tenants will be able to afford proposed higher rents; and a description of the relocation process documenting where tenants will be temporarily or permanently relocated, how long tenants will be relocated, how relocated tenants will be returned to the project, benefits and services that will be available to relocated tenants, relocation budget, and in cases where any tenants may be permanently displaced, an explanation of why they are being permanently displaced and any relocation benefits to be provided (p. 36).

<b>Proximity Radius by Geographic Set-Aside Area (p. 52)</b>	
City of Chicago	0.25 mi.
Chicago Metro (both AHPAA Opportunity Areas and Non)	0.50 mi.
Other Metro	0.75 mi.
Non-Metro	1.0 mi.

Revitalization or redevelopment plan may be termed: empowerment zones, tax increment financing districts, enterprise communities, enterprise zones, AHPAA opportunity area plans, comprehensive plans, land bank authority plans, transit-oriented development plans, interjurisdictional plans, or other locally designated and approved plans subject to Authority review and approval (p. 54).

<b>OTHER CATEGORIES</b>	
O1. Scoring that promotes units for persons with disabilities.	⚡ Up to 3 points for projects whose architectural design and construction meet or exceed enhanced accessibility standards. Max points (3) given when ≥10% of total units in project are designed for persons with mobility impairments and ≥2% of total units in project are designed for persons with sensory impairments and whose universal design score is ≥75 (p. 50).

O2. Scoring that promotes units for special needs populations.	<p>≈ Up to 10 points for projects that include State Referral Network units (p. 59). State Referral Networks units are permanent supporting housing units for special populations (persons with disabilities, homeless/at risk of homelessness, or HHs that need access to supportive services in order to maintain housing) that are not subject to an exiting waiting list and are for HHs ≤30% AMI (p. 7).</p> <p>≈ 3 points for projects with a commitment for Veteran's Administration Supportive Housing (VASH) vouchers for 50%+ units. (4 points if the project has this unit reserve plus social services from the VA) (p. 59-60).</p>
O3. Scoring to promote home ownership.	<p>≈ In the case of scoring ties, the third tiebreaker criteria is that projects intended for eventual tenant ownership will be given preference (p. 60).</p>
O4. Provisions affirmatively furthering fair housing laws.	<p>≈ Applications for projects determined to have a discriminatory effect in violation of the Fair Housing Act will be denied. The Authority reserves the right to waive any provision or requirements of the QAP in order to affirmatively further fair housing (p. 9).</p> <p>Property managers must employ staff who possess Fair Housing certifications (p. 38).</p>