

State: MASSACHUSETTS (QAP 2014)	MA Department of Housing and Community Development (DHCD)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	<p>⌘ In order to avoid undue concentration of resources, DHCD will consider 100+ unit projects only on a case-by-case basis. DHCD will require a detailed market study and will closely examine the probably absorption rate for these projects (p. 51).</p>
A2. Scoring that discourages racial and economic concentration	No.
A3. Mandatory requirements for development in high-opportunity areas	<p>⌘ Priority category 4 mandates family housing production in opportunity neighborhoods (p. 2).</p> <p>⌘ As part of threshold evaluation, sustainable development principle: 6) Expand housing opportunities (p. 6).</p> <p>⌘ DHCD encourages projects that create new affordable housing units, in particular units suitable for families in locations with job growth potential and locations that constitute areas of opportunity as well as projects in communities with growing social and/or educational opportunities (p. 7, 8).</p> <p>⌘ To be consistent with fair housing principles, all projects should offer expanded opportunities to racial, ethnic, and other groups protected under fair housing laws who are underserved in the community in which the project is located (p. 20).</p> <p>⌘ Site reviews will favor sites near service and transportation, buildings for adaptive reuse, and other smart growth opportunities. DHCD encourages the development of projects in such locations since such projects tend to offer greater opportunity to underserved racial and ethnic groups (p. 24).</p>
A4a. Scoring that encourages development in high-income areas.	Relates somewhat to development in areas of opportunity (see A4b).
A4b. Scoring that encourages development in high opportunity areas.	<p>⌘ Up to 14 (cumulative) points for developments located in areas of opportunity¹. Up to 8 points for the strength of the public school system (see A5); up to 6 points for access to employment (average vehicle miles traveled by commuters ≤5 miles = 6 points, ≤7 miles = 4 points, ≤9 miles = 2 points); 2 points for projects located within 2 miles of community colleges and/or state higher education; 2 points for projects located within 1 mile of a major health care facility (p. 37-8).</p>
A5. Scoring or requirements that	<p>⌘ A large portion of opportunity points comprised of scoring on the strength of the public school system a project is</p>

¹ DHCD defines an area of opportunity as part of a neighborhood or community with a relatively low concentration of poverty (poverty rates <15%) that also offers access to opportunities such as jobs, health care, high-performing school systems, higher education, retail and commercial enterprise, and public amenities (p. 37).

preference siting near high-quality schools.	located in. Points based on the percentage of 10 th grade students that score in the Advanced or Proficient categories using an average of the 3 MCAS tests (English Language Arts, Math, and Science/Technology Engineering): ≥90% = 8 points, ≥85% = 6 points, ≥80% = 4 points, ≥75% = 2 points (p. 38).
A6. Scoring that discourages development in distressed neighborhoods. ²	<p>(-) Possibly priority category 3 which focuses on preservation of existing affordable housing but is not specific to <u>current</u> public housing sites (p. 2) <u>although</u> the QAP also encourages preservation developments to apply for 4% credits over 9%. To qualify for the preservation set-aside, developments must be at risk of loss due to market conversion, due to physical condition or financial distress, or application represents a time-limited opportunity to purchase existing affordable housing (p. 17-8).</p> <p>≈ “The quality of the site is one of the most fundamental aspects of any housing project... However, in reality, many tax credits applications represent existing, occupied residential properties located on sites that are acceptable but not ideal. Additional applications represent abandoned or distressed properties... the sites of these properties may also be less than ideal. DHCD anticipates that some 2014 applications will represent occupied or previously occupied HUD properties. If DHCD were making the decision on quality of site, it might not agree with the decision already made by HUD. Since a whole class of applications includes sites that have been accepted by HUD, DCHC has decided not to evaluate ‘site’ as a competitive category in 2014”. However, sites must still be acceptable and applications must undergo a site review (p. 23-4) [See also A3].</p> <p>≈ Subsidy layering reviews may be performed by DHCD moving forward or directly by HUD (at the time of the QAP issuance, DHCD had not made the certification to HUD to assume these responsibilities but may moving forward) (p. 51).</p>
A7. Scoring or requirements that preference siting near mass transit.	<p>≈ Up to 6 points to projects located within ½ of major public transit (3 points for projects located within ¾ mile) with nearby services such as retail or commercial opportunities, grocery or convenience stores, restaurants or municipal offices. Major public transit defined as subway stops, commuter rail stops, ‘key bus route’ stops, and regional transit authority transfer stations (p. 41).</p>
A8. Focus on and operationalization of a neighborhood revitalization plan.	<p>Priority category 2 is development in investment in distressed and at-risk neighborhoods (p. 2).</p> <p>≈ As part of threshold evaluation, sustainable development principles: 1) Concentrate development and mix uses and 2) Advance equity (p. 6).</p> <p>≈ DHCD encourages projects that are part of comprehensive neighborhood revitalization improvement plans, including</p>

² 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>HOPE VI projects (p. 7).</p> <p>⌘ Set-aside for HOPE VI projects (up to 20% of available credit) (p. 18).</p> <p>⌘ Up to 4 points for developments that are included in a comprehensive neighborhood revitalization effort (p. 35).</p> <p>⌘ 3 points to projects located in a QCT in which the development contributes to a concerted community revitalization plan (p. 39).</p>
B1. Local participation in site selection is limited to statutory minimum. ³	<p>⌘ DHCD is committed to working with municipal government to address local zoning obstacles faced by project sponsors as they attempt to produce critically needed affordable rental units (p. 7). [Good provision]</p> <p>For all projects, the developer will have made every effort to secure strong local support for the project (p. 20).</p> <p>⌘ [Threshold Req] Applicants must either show evidence of local support OR include in the written narrative efforts undertaken to obtain local support if it cannot be obtained (p. 24). Lack of local support is not ground for disqualification.</p> <p>⌘ (-) Up to 4 points to developments with a letter of local support from the chief official of the community that specifically endorses the project (p. 35).</p> <p>⌘ QAP outlines provisions to ensure that local preferences for a project do not violate fair housing laws or contribute to discrimination including the development of an affirmative fair marketing plan, to list vacant units with the Citizen's Housing and Planning Association's Massachusetts Accessible Housing Registry, to list vacant units with the city of Boston's Metrolist, and to develop tenant selection lottery systems consistent with that described in the "Guidelines for Housing Programs in Which Funding is Provided by an Non-Governmental Entity" (p. 51).</p>
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<p>⌘ [TR] Application narrative should describe the efforts that will be made to ensure affirmative fair marketing and outreach to those HHs least likely to apply for affordable units within a project (p. 28). DHCD will evaluate the development's marketing and outreach plan. All sponsors should include a detailed plan detailing how they intend to market and attract underserved populations to the project, indicating persons with disabilities and minority HHs (p. 34).</p> <p>⌘ Given the marketing issues that some assisted living projects have encountered, DHCD may require significant additional documentation from sponsors of such projects on how they will market successful over time (p. 33).</p> <p>⌘ DHCD requires developers to establish affirmative action</p>

³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	goals for the percentage of minority participation in each project. Applications must include marketing plan to reach the identified minority groups that are least likely to apply for the housing project being provided. Prior to initial occupancy, the owner shall adopt and implement 1) an affirmative fair marketing plan for all units and 2) a tenant selection plan for low-income units. QAP outlines the percentage goals for occupancy of low-income units which reflect the racial and ethnic composition of the City of Boston (p. 50).
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.	No.
D2. Requirements for monitoring Section 8 voucher access <i>in high-opportunity areas</i> .	≈ As part of annual compliance monitoring, owner must show that they did not refuse to rent to an applicant because they hold a Section 8 voucher (p. 58).
F1. Incentives for larger family units.	≈ Priority category 4 mandates that 65% of units in a development be 2-bedroom or larger and at least 10% be 3-bedroom or larger (p. 2, 21, 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>≈ Priority category 1 is housing for persons with income <30% AMI (p. 1, 8).</p> <p>≈ [TR] All projects must reserve 10% of units for extremely low-income persons (<30% AMI), however, DCHD is encouraging applicants to consider exceeding the threshold limits (p. 3, 27).</p> <p>≈ 3 points to projects that commit to renting ≥15% of all units to HHs with incomes ≤30% of AMI (p. 39).</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	≈ Project owners are required to report race and ethnicity of head of HH (p. 52).

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 182 (Each project must score at least 12 points in each of the 5 fundamental project categories – financial feasibility, design, development team, marketability, readiness to proceed.) (Scoring systems is such that points can only be gained.)

- *A lot of context about priority areas within the QAP. Strong overarching focus on development in opportunity areas, equitable development, social justice. Also that applications must be consistent with these guiding principles.*
- *Strong emphasis on the lack of supply has led to a significant set-aside for production (50%) over preservation (30%) which could contribute to development in higher opportunity areas.*
- *Very good provisions around local support (or lack thereof).*

Notes:

In addition to having to meet set-aside category for either production or preservation, all projects must meet one of the four priority categories as Threshold Criteria to be considered for funding (p.23):

- (1) Housing for extremely low-income individuals, families, and senior earning <30% of AMI. Projects in this category must include support services.
- (2) Investment in distressed and at-risk neighborhoods where strategic housing investment has a strong likelihood of catalyzing private investment, improving housing quality, and promoting occupancy at a range of household incomes. Projects in this category include those located in MA's 24 Gateway Cities and/or QCTs.
- (3) Preservation of existing affordable housing that extends affordability in situations that are consistent with QAP policies and the preservation working group policies.
- (4) Family housing production in neighborhoods and communities that provide access to opportunities, including but not limited to jobs, transportation, education, and public amenities. Access to opportunity locations will be defined by publicly-available data. This category also specifies that at 65% of the units must be 2- bedroom or larger and at least 10% must be 3-bedroom.

Ten sustainable development principles (established in 2007) used as part of the threshold evaluation for applicants; relevant principles listed below:

- (1) Concentrate development and mix uses: Support the revitalization of city and town centers and neighborhoods by promoting development that is compact, conserves land, protects historic resources, and integrates uses. Encourages remediation and reuse of existing sites, structures and infrastructures; create pedestrian-friendly neighborhoods that mix commercial, civic, cultural, educational, and recreational activities with open spaces and homes (**A8**).
- (2) Advance equity: Provide technical and strategic support for inclusive community planning and decision-making to ensure social, economic, and environmental justice (**overall**).
- (3) Expand housing opportunities: Support the construction and rehab of homes that meet the needs of people of all abilities, income levels, and household types. Build homes near jobs, transit, and where services are available (**overall**).

Set-asides: Production (50%), Preservation (30%), HOPE VI (20%).

As part of annual compliance monitoring, if a low-income unit in a project became vacant during year, owner must show that reasonable attempts were made to rent that unit to tenants having a qualifying income before any units in the project were rented to tenants not having a qualifying income (p. 57).

Detailed description what should be included in the required market study including population and HHs, employment and economy, (p. 78-83).

OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<p>✖ DCHD places a special emphasis on increased visitability (p. 3, 8).</p> <p>✖ Up to 8 points to projects that offer no more than 15% of all units for persons with disabilities. Points awarded only if the project design, amenity package, and services are appropriate (p. 37). Not eligible if also applying for special needs population points (see O2).</p> <p>✖ Up to 6 points to projects with enhanced accessibility features (p. 41).</p>
O2. Scoring that promotes units for special needs	<p>✖ Priority category 1 places a particular emphasis on persons who are homeless or at-risk of homelessness</p>

populations.	<p>(p. 1).</p> <p>✖ DHCD places a special emphasis on supportive housing, especially as it relates to addressing homelessness (p. 3).</p> <p>✖ Up to 8 points to projects that offer at least 20% of all units for special needs populations (including but not limited to homeless, veterans, frail elderly). Points awarded only if the project design, amenity package, and services are appropriate (p. 37). Not eligible if also applying for disability population points (see O1).</p>
O3. Scoring to promote home ownership.	No.
O4. Provisions affirmatively furthering fair housing laws.	<p>✖ [TR] Applications must include a narrative describing how the project location and type, tenant selection plans, and other applicable policies and procedures will further DHCD's Fair Housing Principles (p. 28, 94).</p> <p>✖ As part of annual compliance monitoring, owner must show that all units were for use by the general public including the requirement that no finding of discrimination under the Fair Housing Act occurred for the project (p. 57).</p>