

<b>State: MISSISSIPPI (QAP 2013)</b>	Mississippi Home Corporation (MHC)
<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	≈ All acquisition/rehabilitation developments that involve the displacement of persons must submit a Relocation Plan subject to the requirements of the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970 (p. 5).
A2. <b>Scoring</b> that discourages racial and economic concentration.	<p>≈ Up to 5 points for development location. This is based on categories of the Housing Need Point Eligibility which is comprised of: (1) <b>HTC Units Allocated between 2008-2012</b>, (2) Renter Households Below 60% of AMI, and (3) Growth Rank. Points assigned to include approximately 16 counties in each category based on the need indicators (see the chart p. 22). [QAP is vague as to how Need Points are assigned (i.e., whether high or low number of HTC units correlates with more/less points) though presumably, low number of HTC units = more points, hence this categorization under A2. See also A6 and A4b.] (p. 22)</p> <p>≈ 5 points to developments located in a zip code which has not had any tax credit developments funded between 2008-2012. Additionally, developments funded in these areas will be eligible for the discretionary 130% basis boost (p. 22).</p>
A3. <b>Mandatory requirements</b> for development in high-opportunity areas	No.
A4a. <b>Scoring</b> that encourages development in high-income areas.	No.
A4b. <b>Scoring</b> that encourages development in high opportunity areas.	≈ Up to 5 points for development location. This is based on categories of the Housing Need Point Eligibility which is comprised of: (1) HTC Units Allocated between 2008-2012, (2) Renter Households Below 60% of AMI, and (3) <b>Growth Rank</b> . Points assigned to include approximately 16 counties in each category based on the need indicators (see the chart p. 22). [QAP is vague as to how Need Points are assigned but presumably higher growth rate = more points, hence this categorization under A4b. See also A2 and A6.] (p. 22)
A5. <b>Scoring</b> or <b>requirements</b> that preference siting near high-quality schools.	No.
A6. <b>Scoring</b> that discourages development in distressed neighborhoods. <sup>1</sup>	≈ (-) Up to 5 points for development location. This is based on categories of the Housing Need Point Eligibility which is comprised of: (1) HTC Units Allocated between 2008-2012, (2) <b>Renter Households Below 60% of AMI</b> , and (3) Growth Rank. Points assigned to include approximately 16 counties in each category based on the need indicators (see the chart p. 22). [QAP is vague as to how Need Points are assigned but

<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.

	<p>presumably higher number of low income HHs correlates with more points hence this categorization under A6. See also A2 and A4b.] (p. 22)</p> <p>⚠ (-) 10 points to multifamily or single family rehabilitation developments that have been identified as endangered by HUD's Multifamily Program Division or USDA-Rural Development (p. 26).</p> <p>See also G1.</p> <p>⚠ (-) As a tie-breaker, developments located in QCTs will be prioritized over those that are not (p. 32).</p>
A7. <b>Scoring or requirements</b> that preference siting near mass transit.	No.
A8. <b>Focus</b> on and operationalization of a neighborhood revitalization plan.	<p>⚠ 5 points for projects located in a QCT or DDA and that contribute to a concerted revitalization plan. In municipalities with a revitalization plan, documentation must include a letter from the city/county, signed by the subject area's verifiable authority, which verifies that the development is a part of the community revitalization plan and provides a detailed description of the contribution to the Revitalization Plan. Additionally, the applicant must submit a copy of the relevant information from the area's plan regarding its housing goals/objectives. [However], in municipalities without a community revitalization plan, applicant must provide a letter of support from the highest ranking elected official(s) stating that the proposed development is not a part of a revitalization plan, (ii) but it is desired within the community and (iii) describes how the development supports the community's vision for future growth verifying that the development contributes to the community (p. 21). [This is weak in terms of the community revitalization plan requirement, and in communities without a CRP, could count as a negative toward B1.]</p>
B1. Local participation in site selection is limited to statutory minimum. <sup>2</sup>	⚠ See A8.
<b>HOUSING ACCESS: Affirmative Marketing, Priority Groups</b>	
C1. Mandatory requirements ensuring affirmative marketing.	No.
C2. Scoring that incentivizes affirmative marketing.	<p>⚠ To qualify for points for housing for persons with disabilities (10), applicant must submit a specified marketing plan that identifies how they will target qualified residents under this category (see O1) (p. 28). Similarly to qualify for points for housing for Veterans (15), applicant must submit a specified marketing plan that identifies how they will target qualified residents under this category (p. 29).</p>
C3. Scoring that incentives language access and marketing to non-English	No.

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

speakers.	
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	No.
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<p>≈ Developments receiving tax credits must commit to providing housing (i) for persons on public housing waiting lists, or in those jurisdictions where there is no housing authority, (ii) for persons on waiting lists for other affordable housing developments. Evidence of the use of the waiting list must be provided at the final inspection before the issuance of Forms 8609 (p. 13).</p> <p>≈ As part of annual compliance monitoring, owner must show that they have not refused to lease a unit in the development to a Section 8 applicant solely because the applicant holds a Section 8 Housing Choice voucher (p. 57).</p>
F1. Incentives for larger family units.	≈ 5 points for developments that target large families by providing $\geq 25\%$ of its units as 3+ bedrooms (p. 27).
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 15 points for developments utilizing PBRA (100% of units = 15 points; 99-51% = 10 points; <math>&lt; 51\%</math> = 3 points) (p. 26). [Does not specify whether PBRA should be for new or existing units. If for rehab developments on existing subsidies, may be a negative in A6.]</p> <p>≈ 10 points for developments that reserve <math>\geq 15\%</math> of total units for tenants with <math>\leq 30\%</math> AMI (p. 27).</p>
<b>REPORTING REQUIREMENTS</b>	
H1. Racial/demographic reporting requirements.	No.

### **OVERALL ASSESSMENT**

TOTAL POINTS POSSIBLE: XX (Scoring systems is such that points can be gained or lost.)  
Applicants must score a minimum of 85 to be considered.

- *Housing Need eligibility point is a confusing scoring system that has contradictory components in terms of how they work toward site and neighborhood standards.*
- *The clause about points for developments in community revitalization plan is very weak since a CRP does not have to be in place.*
- *Clear mention of affirmative marketing to specific populations (disabled, Veterans).*

#### Notes:

[Minimum Req] Applicants must elect to provide a minimum of at least (a) 20% of the total residential units be rent restricted and occupied by tenants whose income is 50% or below the AMI **OR** (b) 40% of the total residential units be rent restricted and occupied by tenants whose income is 60% or below the AMI (20/50 or 40/60 minimum allowable federal threshold) (p. 1).

Set-asides include: non-profit (10%), developments in health care zone<sup>3</sup> (\$750,000 in 2013 and 25% of 2014 credits), historic/rehab (\$1,000,000 in 2013), elderly/disabled persons (\$500,000 in 2013) (p. 18-19).

<sup>3</sup> A health care zone is defined as a county which has certificates of need of  $> 375$  acute care hospital beds and is located within a 5 miles radius of a health care facility with a certificate of need for acute care hospital beds (p. 18).

15 points for developments located within a certified health care zone. This is a county which has certificates of need of >375 acute care hospital beds. All proposed developments must be located within a 5 mile radius of a qualifying health care facility. The market study must address housing priority for this specialized need. Applicants must include a specified marketing plan that identifies how they will target qualified medical professional personnel for the development (p. 29).

The market study must include (among other things) a problem definition, physical/location analysis, economic analysis, and demographic analysis (p. 37).

<b>OTHER CATEGORIES</b>	
O1. Scoring that promotes units for persons with disabilities.	≈ 10 points to multifamily developments that set aside a minimum of 10% up to a maximum of 25% of units to persons with disabilities. The market study must address housing priority for this specialized need. Applicants must include a specified marketing plan that identifies how they will target qualified residents under this category [C2] (p. 28).
O2. Scoring that promotes units for special needs populations.	
O3. Scoring to promote home ownership.	≈ 15 points for Single Family Lease Purchase Development slated for future homeownership (p. 25).
O4. Provisions affirmatively furthering fair housing laws.	<p>≈ As part of annual compliance monitoring, owner must demonstrate no finding of discrimination under the Fair Housing Act has occurred for the development (p. 57).</p> <p>≈ QAP includes a full section on Fair Housing Accessibility Requirements (see p. 62-66).</p>