

State: WISCONSIN (QAP 2013-2014)	Wisconsin Housing and Economic Development Authority (WHEDA)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	No.
A2. Scoring that discourages racial and economic concentration.	No.
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	No.
A4b. Scoring that encourages development in high opportunity areas.	<p>✖ See QAP Objective #3 in Notes section.</p> <p>≈ 7% set-aside for high impact projects which have at least 3 of the criteria below (p. 3):</p> <ol style="list-style-type: none"> 1. Has a clear, proximate link to area job growth, or employers, or a major employment center, including financial or other support 2. Is a key component of larger redevelopment plan and is identified as such in a letter from the local municipality (applies to A8). 3. Is located in an area with few affordable housing options, or will otherwise have an immediate high impact for potential residents 4. Will exceed the minimum required participation for the Emerging Business and Workforce Development Program for the property's location. <p>≈ Up to 30 points to developments near employment centers and/or high needs areas. 15 points to developments located within 1 mile of a major employer or employment center (500+ total employees) which demonstrates support of the development via support letter(s); 15 points to developments located in WHEDA-determined areas with high occupancy and where data suggests a severe housing need or imbalance exists between housing and employment opportunities (p. A36-7).</p>
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ¹	✖ (-) 20% reservation set-aside for federally-assisted housing units (p. 2).

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.

A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	<p>⚠ See QAP Objective #6 in Notes section.</p> <p>⚠ See criteria #2 of high-impact set-aside (p. 3) (and as listed in A4b).</p> <p>⚠ 5 points to developments located in a QCT and in which the development contributes to a community revitalization or redevelopment plan. Attach a map of the census tract showing the project location and a copy of the plan (p. A21).</p> <p>⚠ Up to 40 points to applications which propose acquisition and rehab of existing single family, duplex or four-plex housing as part of a targeted, city-supported plan to stabilize neighborhoods due to vacant properties and/or foreclosure, or existing tribal housing (p. A27).</p>
B1. Local participation in site selection is limited to statutory minimum. ²	<p>⚠ As required by the [federal] Code, WHEDA will notify the appropriate official's office in the local jurisdiction of the proposed Credit development location and solicit comments. While Credit cannot be denied to a development based solely on such comment, WHEDA will consider this information, and in its sole discretion may utilize such comment in its decision making process. WHEDA will evaluate all input received from the appropriate official(s) when deciding to award Credit to a particular development (p. 5). [Seemingly neutral though may leave a loophole open for discrediting projects that lack local support.]</p> <p>⚠ 2 points for submitting a Local Official Notification form executed by a local elected official, or a local non- elected official from the planning department (or local equivalent). This document signifies local notification, and does not represent local approval or support (p. A22).</p> <p>⚠ (-) Up to 6 points for letters of support from local non-elected municipal officials, local elected public officials other than individuals signing Local Notification Form, local housing-related neighborhood groups, local housing authorities, or major employers. The letter(s) must not be neutral and must clearly demonstrate favorable support (p. A22).</p> <p>⚠ (-) Up to 25 points for local financial participation including local government funding for on-site project costs (through HOME, CDBG funds or other financial resources in the form of loans, grants, or a combination thereof); or if the local government creates a quantifiable reduction of on-site project development costs specifically for this project. Examples of quantifiable reduction of on-site development costs include: waiver of water or sewer fees, waiver of building permit fees</p>

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

	or other government development fees, waiver of impact fees, donation or waiver of project specific assessment or infrastructure costs, provides reduction of purchase price for land or buildings as compared to assessed or appraised value, provides demolition and removal of existing structures at no/reduced cost (p. A30).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No.
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, the development must document that an owner cannot refuse to lease a unit in the development to an applicant because the applicant holds a voucher or certificate of eligibility under Section 8 of the United States Housing Act (p. 12).
F1. Incentives for larger family units.	✖ Up to 18 points for projects providing a high percentage of 3+-bedroom units (p. A23).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (<i>outside high-poverty areas</i>).	✖ See QAP Objective #5 in Notes section. ✖ [Tiebreaker #1] Priority given to the application with the highest percentage of units set aside at 30% and 40% of county median income (p. A20). ✖ Up to 80 points for projects that set aside a specific percentage of units for residents earning less than 30%, 40%, or 50% of the County MI (p. A24). Points are not awarded in this category for developments applying in the Preservation Set-aside, or for developments with federal operating or rental subsidies, or developments with federal financing unless they clearly result in the creation of new low-income units. In addition, points are not awarded for units with dedicated, project-based vouchers or certificates.
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 465. (Scoring systems is such that points can only be gained.)
Minimum score of 140 points required.

- *Other than preferences, few provisions that really speak to development in high opportunity areas, nothing around reducing poverty concentrations, nothing on affirmative marketing.*

- Large number of points awarded for large family developments.
- Several provisions related to local participations – some neutral-negative leaning and others more overtly negative.

Notes:

Objectives of the qualified allocation plan include (p. 1):

1. Increase the quantity of safe, quality, affordable rental housing throughout Wisconsin
2. Preservation of existing affordable rental housing throughout Wisconsin
3. Support State of Wisconsin job creation goals, and increase the quantity of affordable workforce housing near employment centers (**A4b**).
4. Increase the availability of housing with supportive services, including for veterans (**O2**).
5. Increase availability of housing that serves those with very low incomes ($\leq 50\%$ county median incomes) (**G1**).
6. Support community-initiated and neighborhood-supported affordable housing plans (**A8**).
7. Support the housing goals and objectives stated in the State of Wisconsin 2010-14
8. Support the housing goals and objectives stated in the Plan to End Homelessness in Wisconsin (**O2**).

There will be one pool of Competitive Credit divided into five set-asides and one reserve. These set-asides are General (43%), Nonprofit (10%), Preservation (20%), Rural (10%), Supportive Housing (10%) and High Impact Project Reserve (7%) (p. 1-3).

OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<p>⌘ Up to 23 points to developments offering architectural features that increase accessibility (p. A28-30).</p>
O2. Scoring that promotes units for special needs populations.	<p>⌘ See QAP Objectives #4 and #8 in Notes section.</p> <p>⌘ 10% supportive housing set-aside for developments intending to provide supportive services in at least 50% of the units for individuals and families who are homeless, at risk of homelessness, and/or have disabilities and who require access to supportive services to maintain housing (p. 3).</p> <p>⌘ Up to 35 points to projects that provide support services to veterans, individuals and families who are homeless, at risk of homelessness and/or have disabilities and who require access to supportive services to maintain housing (p. A24-6).</p>
O3. Scoring to promote home ownership.	<p>⌘ 3 points for developments in which all units are intended for eventual resident ownership. A Resident Homeownership Plan must be submitted with initial application. The plan must incorporate an exit strategy, including how units will be marketed and sold to the eventual resident owner, as well as detailing the provision of services including home ownership education, training, and down payment assistance (p. A32-3).</p>
O4. Provisions affirmatively furthering fair housing laws.	<p>⌘ As part of annual compliance monitoring, owner must show that all units in the development are for use by the general public, including the requirement</p>

	that no finding of discrimination under the Fair Housing Act occurred for the development. A finding of discrimination includes an adverse final decision by the Secretary of the Department of Housing and Urban Development or an adverse judgment from a Federal court (p. 11-12).
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