

Appendix A: STATE-BY-STATE SUMMARIES OF QAP PROVISIONS

STATE: Alabama (QAP 2023)	Alabama Housing Finance Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ [TR] The required market study must demonstrate an adequate market for the proposed units and that the proposed project would not adversely impact any existing AHFA projects or create excessive concentration of multifamily units (p. 6). ❖ AHFA may terminate applications if the proposed market is determined to be a questionable market or will have a clear long-term negative impact on an existing AHFA-funded development in the same market (p. 6-7) ❖ [TR] AHFA will not consider project applications that are located within a 2-mile radius of an AHFA project approved by AHFA for funding in a prior year’s cycle that has not been placed in service and/or is not 90% + occupied. <i>However, an exception to this are projects financed through HOPE VI, Choice Neighborhood, Replacement Housing Factor funds, Capital Fund Program funds, and Promise Neighborhoods</i> (p. 14-15). ❖ A housing priority is to achieve a balanced distribution of the Housing Credits throughout the state in terms of geographical regions, counties, urban, and rural areas (p. 3). AHFA will generally allocate housing credits to only one project per county (A1).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<p>No.</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ Up to 4 points awarded to projects located in census tracts where the median family income is $\geq 70\%$ of the county’s median family income (1 point for every 10% over 70%, up to 100%+) (p. A8). ❖ If there is a tie, priority will be given to a project located in a Census Tract where the 2020 Estimate Tract Family Income is equal to 100% or more of the country’s 2022 Median Family Income published by HUD (5th tiebreaker condition) (p. A2)

<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 10 points awarded (2 per service) to projects located near the following neighborhood services: grocery store, convenience store, hospital/doctor’s office, pharmacy/drug store, bank/credit union (p. A8).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>No.</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.¹</p>	<ul style="list-style-type: none"> ❖ (-) 8 points awarded to rehab of existing AHFA HOME funded project; 2 points awarded for rehab of existing multifamily rental housing (p. A7). ❖ Unlimited loss of points for projects located near negative services. 5 point deduction for each adjacent (defined as nearby) junk yard/dump, salvage yard, wastewater treatment facility, distribution facilities, electrical utility substations, railroads, adult video/theater/live entertainment, pig/chicken farm, processing plants, industrial, airports, prison/jail, solid waste disposal. 2 point deduction for each junk yard/dump, salvage yard, wastewater treatment facility, pig/chicken farm, processing plants, airports, prison/jail, solid waste disposal within 0.3 miles (p. A8-9). ❖ 2 point deduction if condition of the streets and sidewalks are unsatisfactory; the width of the streets and the difficulty of access to the project site will be taken into consideration (p. A9).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No.</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ In case of a scoring tie, priority will be given to projects located in a QCT and is supported by its respective governmental entities’ approved Revitalization plan (8th tiebreaker condition) (p. A2).
<p>B1. Local participation in site selection is limited to statutory minimum.²</p>	<ul style="list-style-type: none"> ❖ (-) AHFA will notify the chief executive officer of a local jurisdiction of project applications in their area and will provide a reasonable opportunity to comment on the proposed project [While this is in line with the statutory minimum], the QAP goes on to note that while a lack of expressed support does not mean that the project is necessarily opposed by the chief executive officer, AHFA recognizes that

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.

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

	obtaining community support may mitigate the negative connotations that sometimes accompany an affordable housing project. Accordingly, applicants should make reasonable efforts to assess and solicit the support from all applicable parties (p. 3).
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.	❖ 1 point awarded to projects that have committed in writing to target households on the public housing waiting lists (A7).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	❖ 1 point to projects targeting low-income families (individuals with children) with a minimum of 15% of the low-income units having three or more bedrooms (p. A7).
F2. Incentives targeting families/families with children	No. (some overlap with F1).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	No.
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ 2 points to projects that set aside a minimum of 7% of the total proposed units for tenants with disabilities (A7). ❖ 1 point awarded to projects that provide a minimum 5% of units designed for persons with mobility impairments and 2% of units designed for persons with sensory impairments (p. A7).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 1 point to projects with 100% of the units in the project designed, equipped and set-aside for the elderly (A7). ❖ 2 points to projects that set aside a minimum of 7% of the total proposed units for homeless populations (A7).

O3. Scoring to promote home ownership.	❖ In case of a scoring tie, priority will be given to projects that are intended for eventual tenant ownership (9th tie-breaker condition) (p. A2).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	B1; O2

2022:

<https://www.ahfa.com/Content/Uploads/ahfa.com/files/AHFA%202022%20Housing%20Credit%20QAP%2012.6.21.pdf>

2023:

https://www.ahfa.com/Content/Uploads/ahfa.com/files/MF%20Allocation/2023%20docs/AHFA%202023%20QAP_092622.pdf

TOTAL POINTS POSSIBLE (for Project (not Applicant) Characteristics): Max Gain: 83/ Max Loss: Unlimited (Scoring systems is such that points can be gained and lost to contribute to an overall project score. Projects with a net score <70 will not be considered for funding.)

NOTES:

A description of the State Consolidated Plan states that “The largest numbers relative to housing needs are found in the state’s most populous urban and metropolitan counties, but the greatest concentration of need is observed in rural counties located in the southern portion of the state, the Black Belt in particular” (p. 5). Indicates a state acknowledgement of racial and economic concentrations.

CHANGES SINCE 2015:

B1: Local participation in site selection provision is weaker, in that it no longer states that “consideration is given to projects which are able to demonstrate support from the communities they will ultimately serve.”

C1: Language from previous QAP requiring a completed HUD Affirmative Fair Housing Marketing Plan is not in the most recent QAP

O2: Added a small point award for units set aside for the elderly and for homeless populations.

STATE: Alaska (GOAL-QAP 2022)	Alaska Housing Finance Corporation
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.	❖ [Funding Considerations] The CEO may use considerations other than the point ranking to make the final funding awards, including: increasing the spread of projects by geographic location (p. 19)

	<ul style="list-style-type: none"> ❖ Maximum 12 points for project mix. For projects located in a census tract where: <ul style="list-style-type: none"> • more than 51% of the households have income greater than the AMGI <ul style="list-style-type: none"> ○ 8 points if projects are 80% LI ○ 6 points – 75% LI ○ 4 points – 70% LI ○ 2 points – 65% LI • 40% more of the households, but less than 51% of the households have income greater than the AMGI <ul style="list-style-type: none"> ○ 4 points – 80% LI ○ 3 points – 75% LI ○ 2 points – 70% LI ○ 1 point – 65% LI • At least 20% of the households have income less than 30% of the AMGI (p. 27) <ul style="list-style-type: none"> ○ 8 points – 80% LI ○ 7 points – 60% LI ○ 6 points – 40% LI ○ 5 points – 20% LI <p>(p. 27)</p> ❖ Bonus: regardless of the census tract income, if at least 20% of the units are unrestricted by income and the remainder are income restricted OR if at least 20% of the units are restricted by income and the remainder are unrestricted by income, 4 points will be awarded (p. 27)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No</p>
<p>A4a. Scoring that encourages development in high-income areas. *</p>	<ul style="list-style-type: none"> ❖ Up to 15 points for projects located in areas with low unemployment: <ul style="list-style-type: none"> • 15 points – unemployment is 2.5% or more below the state average • 12 points – unemployment at least equal to the state average • 10 points – unemployment is no more than 1% of the state average

	<ul style="list-style-type: none"> • 8 points – unemployment is no more than 3% of the state average • 4 points – unemployment is no more than 5% of the state average • 0 points – unemployment exceeds the state average by more than 5% (p. 29)
A4b. Scoring that encourages development in high opportunity areas. *	<ul style="list-style-type: none"> ❖ [Based on the assumption that areas with larger population growth may have more opportunities] 4 points awarded if the property is in an area with a 3-year average population growth rate less than 0 (p. 24): <ul style="list-style-type: none"> • 15 points – population growth over the past three years is $\geq 2\%$ • 12 points – population growth over the past three years is at least 1.25% but less than 2% • 10 points – population growth over the past three years is at least 0.5% but less than 1.25% • 8 points – population growth over the past three years is greater than 0% • 6 points – population growth over the past three years is greater than 0% but less than 0.5% • 4 points – population growth over the past three years is less than or equal to zero, but greater than -0.5% (p. 30-31)
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ³	No
A7. Scoring or requirements that preference siting near mass transit.	No
A8. Focus on and operationalization of a neighborhood revitalization plan. *	❖ Preference (established by federal code) for projects that are located within a

³ 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>qualified census tract and the development of which contributes to a concerted community revitalization plan (p. 10)</p> <ul style="list-style-type: none"> ❖ 1 point awarded if the project is located in a Qualified Census Tract and is considered to contribute to a community revitalization plan (p. 21)
B1. Local participation in site selection is limited to statutory minimum. ⁴ *	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The project must demonstrate acceptable community support which must be evidenced by written letters of support from the local government, community council(s), etc. (p. 12)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing. *	<ul style="list-style-type: none"> ❖ Design requirements for all construction and rehabilitation projects must include Equal Opportunity in regard to marketing and tenant selection (affirmative marketing procedures), and reasonable accommodation and modification for those tenants covered under the law (p. 4) ❖ Affirmative marketing efforts are included as an area for compliance monitoring (p. 44) ❖ Project records must include evidence supporting that the project Affirmative Marketing efforts are on going and directed toward towards the appropriate tenant population (p. 45)
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. *	<ul style="list-style-type: none"> ❖ 1 point will be awarded to applications that contain a written commitment to give priority to households on waiting lists for subsidized housing. Applicants must describe how a referral relationship will be achieved (p. 28)

⁴ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<ul style="list-style-type: none"> ❖ LIHTC projects may not refuse to lease to a holder of a certificate of family participation under the Section 8 Existing Voucher Program or to a holder of a comparable document evidencing participation in a HOME tenant-based assistance program because of the status of the prospective tenant as a holder of such certificate, voucher, or comparable HOME tenant-based assistance document (p. 28-29)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ State of Alaska prioritizes projects that include larger units (i.e. greater number of bedrooms) for families (p. 10) ❖ Maximum 2 points awarded for projects that include larger units for households with children (p. 23)
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ Unless otherwise waived by AHFC, all projects with 8 or more units, serving families with children (defined as any building or complex that contains units with three bedrooms or more) must have a recreation area on-site for children which is designed and equipped with age appropriate equipment (p. 12).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Preference (established by federal code) for projects that serve the lowest income tenants (p. 10) ❖ Maximum 12 points awarded to projects that serve the lowest income tenants. Points will be awarded for setting aside more than 10% of a project's units, up to 60% of the project's units, for households at or below 50% of the AMI (p. 25) ❖ 1 point will be awarded to applications that commit the project to an extended low-income use equaling 30 years. (p. 26)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<ul style="list-style-type: none"> ❖ Project records must include household demographic characteristics [information

	on race and Hispanic ethnicity of head of household] (p. 45)
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> <li data-bbox="873 300 1430 520">❖ [Threshold Requirement] All new construction projects with 5 or more units must provide a minimum of 5% of the total unit count (fractional units rounded up), specifically equipped for persons with disabilities. (p. 12) <li data-bbox="873 552 1430 693">❖ Up to 8 points for projects that include units equipped for persons with physical disabilities and sensory impairments (p. 23).

<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ State of Alaska prioritizes projects that target “special needs populations” (i.e. persons who experience mental or physical disabilities, homeless persons, and families who income does not exceed 30% of the AMI, adjusted for household size) (p. 10) ❖ [Threshold Requirement] For all projects with 20 or more units, 5% of the total unit count (fractional units round down) must be set aside for a “special needs” population that is not required to be served as a condition of the funding source requested. (p. 12) ❖ 3 points for service enriched housing, which incorporates substantive social services for homeless and/or disabled Alaskans on an ongoing basis. Points are only available if households with physical and/or mental disabilities, or homeless persons will be served by the proposed project through hard set-aside units. Services must be tailored toward the populations served by the special needs set-aside units (p. 25) ❖ Maximum 8 points will be awarded for projects committing additional units (up to 50% of the residential units in the project) to special needs population above those commitments already required by their funding sources and the GOAL program (p. 26) ❖ 1 point will be awarded to any applicant that commits to giving preference to homeless families (including single individuals) in the tenant selection process for a GOAL funded project. (p. 28)
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ 1 point will be awarded to any project that is designed and operated so that the units will be eventually sold to the tenants. In order to receive the point in this category, applicants must provide

	documentation showing a comprehensive plan for tenant ownership counseling which includes maintenance techniques for the home (p. 28)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ It is a requirement of receipt of any funding under the GOAL program that any owner/developer/borrower and any of its employees, agents, or sub-contractors understands and agrees that it is the total responsibility of the owner to adhere to and comply with all Federal Civil Rights Legislation inclusive of the Fair Housing Laws, Section 504 of the Rehabilitation Act, the ADA, as well as any state or local Civil Rights legislation. (p. 4) ❖ Fair housing compliance is included as an area for compliance monitoring (p. 44) ❖ Project records must include evidence supporting that the project complies with the Fair Housing Act and does not discriminate in the provision of housing (p. 45)
Change since 2015?	A2; F1; G1; O2

https://www.ahfc.us/application/files/2816/5663/3221/GOAL_Qualified_Allocation_Plan_-_06.29.22.pdf

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 224. (Scoring system is such that points can only be gained.)

- The rating and reward criteria, also referred to as the Qualified Allocation Plan (QAP), will be used to award Greater Opportunities for Affordable Living (GOAL) Program Funds. LIHTC is one of the funding sources for the GOAL program.

CHANGES SINCE 2015:

F1: AFHC added a priority for projects including larger units (i.e., greater number of bedrooms) for families.

O2: AFHC added a priority for projects that target “special needs populations.”

STATE: Arizona (QAP 2022-23)	Arizona Department of Housing (ADOH)
Measure	Evidence

HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ ADOH states a guiding principle is to provide an equitable distribution of tax credits across the state (p. 1).
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.	❖ Up to 35 points for projects with existing service facilities located within 2.5 miles for Metro projects/4 miles for rural projects: 10 points for grocery stores; 5 points for one of either school (for households with children projects only), senior center (for older person projects only), community center, public park, or library; 5 points each for shopping or pharmacy, medical facility, employment center (p. 17-18).
A5. Scoring or requirements that preference siting near high-quality schools.	❖ See A4b. 5 possible points for proximity to school for households with children projects only (p. 17-18).
A6. Scoring that discourages development in distressed neighborhoods. ⁵	<p>❖ (-) One award to an application designated as a Choice Neighborhoods project by a public housing authority implementing a HUD Choice Neighborhoods implementation grant (p. 8).</p> <p>❖ ADOH may determine an application is ineligible due to the site being within half a mile of an airport; chemical or hazardous materials storage/disposal; commercial junk or salvage yards; industrial or agricultural activities generating odors or pollution; landfills currently in operation; or wastewater treatment facilities. Additionally, an application may be ineligible if the site is adjacent to, or across a street from an adult entertainment establishment; distribution facility involving trucking; factory or similar industrial operation; jail or prison; or source of excessive noise (p. 13).</p> <p>❖ (-) 5 points if at least one building is located in a QCT (p. 19).</p>

⁵ 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.

	<ul style="list-style-type: none"> ❖ (-) 5 points if all the project’s building are in a DDA (p. 19).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 5 points for projects with bus/transit stop located within 2.5 miles for Metro projects/4 miles for rural projects at a fixed location served by a public transportation system six days a week (if within service area of Valley Metro or Sun Tran), or five days a week (if within service area of another public transit system) (p. 18).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Up to 25 points for properties identified by a local government as in need of rehabilitation for community revitalization purposes (p. 16). ❖ 10 points for project located in a site designated for a community revitalization plan (p. 19).
<p>B1. Local participation in site selection is limited to statutory minimum.⁶</p>	<ul style="list-style-type: none"> ❖ (-) ADOH will notify the local government where the project is located and request that the local government provide a letter of acknowledgement and consent to the project. The local government will be required to respond to ADOH within 30 days from the date of the letter. <i>An application will be deemed ineligible in the event that the local government either fails to provide the letter or otherwise indicates that the proposed project is unfavorable.</i> ADOH will determine whether the objectionable characteristic(s) can be mitigated, before

⁶ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>determining that a project is ineligible for an award (p. 4).</p> <ul style="list-style-type: none"> ❖ (-) 10 points for projects where the local government is providing new funding towards the development budget (at least \$500,000 loan for Metro and \$250,000 for rural projects) (p. 20). ❖ (-) 5 points for projects selected by local government using a request for proposals/qualifications process (p. 20).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No.
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentivizes language access and marketing to non-English speakers.	No.
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	❖ [Threshold req] Applicants will represent that at least one month prior to commencing lease-up, the management company will inform the local public housing authority and Housing Choice Voucher administrator of accepting their referrals (p. 12).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	❖ As part of annual owner certification, the owner must certify that they have not refused to lease a unit to a rental applicant due t the rental applicant holding a HUD Section 8 voucher or certificate (Compliance Manual, p. 5).
F1. Incentives for larger family units.	❖ 20 points for a family property with at least (20%) of units containing three or more bedrooms (p. 22).
F2. Incentives targeting families/families with children	See F2.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	No.
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ Up to 30 points for projects that commit to accept a contract for HUD 811 rental assistance for at least 10% of proposed units (p. 16).

O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 20 points for 15% and 30 points for 30%+ of units for special populations such as: persons with disabilities, veterans, persons experiencing homelessness, victims of domestic violence and youth exiting foster care (p.16-17). ❖ 20 points for senior housing with services, including at least three of the following: garages or covered parking, design units to provide an additional five percent (5%) accessible units above the minimum required, fitness room with equipment, walking path and outdoor seating area, community garden, adjacent to a senior center or community center with regular programming (property provides regular transportation to senior center or community center), regular transportation or on-site bus stop, or structured recreational or educational programs (p. 21-22).
O3. Scoring to promote home ownership.	❖ 20 points for projects intended for homeownership conversion located on tribal land. 10 points if located elsewhere (p. 22).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	A1; A6; A7; A8; C1; D1; D2; F1/F2; O1; O2; O3;

ADOH LIHTC Compliance Manual (2019):

<https://housing.az.gov/sites/default/files/documents/files/2019-Compliance-Manual.pdf>

QAP (2022-23): <https://housing.az.gov/sites/default/files/documents/files/Final-QAP-2022-2023.pdf>

TOTAL POINTS POSSIBLE: 4% LIHTC credits—120 points possible, but not scored (awarded on a first come, first serve basis). Applications under the competitive 9% LIHTC round must have a minimum total score of 90 points.

CHANGES SINCE 2015:

A1: Rating downgraded. ADOH dropped mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration in the QAP. Provisions removed include the “general goal of developing affordable rent housing units in areas with the highest market demand while avoiding concentration of affordable properties in distressed areas,” the ability of ADOH to limit the number of projects in a specific market or geographical area if ADOH “determines that there is insufficient demand or that a particular project would have adverse impact on low-income housing developments existing in a given market area,” and the provision that the required marketing plan “specifically address any potentially adverse demographic, rent-up, or capture rate information in the Application for the primary market area identified in the Market Demand Study.”

A6: Rating improved. ADOH improved its scoring that discourages development in distressed neighborhoods by including a provision that allows ADOH to declare an application ineligible if the site is located too close to pollution-creating facilities or other objectionable industry operations.

A7: Rating downgraded. ADOH decreased the maximum possible points available for siting near mass transit.

A8: Rating improved. ADOH clarified the meaning of a neighborhood revitalization plan and awards a large number of points for projects located in sites designated for community revitalization.

C1: Rating downgraded. Mandatory requirements ensuring affirmative marketing are no longer in QAP.

D1: Rating unchanged, but provision is different. ADOH added a threshold requirement that the management company must inform the local public housing authority and Housing Choice Voucher administrator of accepting their referrals. Also, provision “strongly encouraging” owner to contact local public housing authority to occupy vacant units from the current public housing waiting list is absent from QAP.

F1/F2: Ratings improved. ADOH increased the point award for a family property with at least (20%) of units containing three or more bedrooms.

G1: Rating removed. Scoring that promotes units for lowest-income households is no longer in QAP.

O1: Rating improved. ADOH added a substantial point award for projects that commit to accept a contract for HUD 811 rental assistance for at least 10% of proposed units.

O2: ADOH strengthened provisions promoting units for special needs populations.

O3: Rating improved. ADOH added scoring to promote homeownership to QAP.

STATE: Arkansas (QAP 2023)	Arkansas Development Finance Authority
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.	❖ Recognizing the limited availability, AFDA will allocation State LIHTCs to developments whose applications score the highest with a priority for developments located in counties that are assigned to tier 4 or tier 3 of the four job-creation tiers of the Arkansas

	<p>Economic Development Commission (p. 2-3) [see notes]</p> <ul style="list-style-type: none"> ❖ Up to 10 points for developments in an Area of Opportunity. Area of Opportunity Index (AOI) is calculated for the development’s Census Tract and is based on unemployment rate, vacancy rate, and population growth (p. 22-23) ❖ Up to 24 points for Site Selection. The site location will be evaluated for accessibility and proximity to services appropriate to the type of housing and residential character of the surrounding area. 3 points for the following site amenities located within 3 miles of the site: <ul style="list-style-type: none"> • Grocery store or supermarket • Pharmacy or drug store • School, daycare, or education center (<i>cannot be awarded if 100% elderly only property</i>) • Public park or Green Space • Book lending public library • Daily operated senior center or facility offering daily services for seniors (<i>can only be awarded if 100% elderly property</i>) • Hospital, health clinic, or medical doctor’s office (medical doctor’s office must have a general practitioner) • Public transportation • Access to Pedestrian Trails (p. 24)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>[See A4b] Although the provision does not specify “high-quality” schools</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁷</p>	<ul style="list-style-type: none"> ❖ ADFA gives priority to developments located within Qualified Census Tracts (p. 3)

⁷ 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.

	<ul style="list-style-type: none"> ❖ Points will be deducted for site selection. There is not a limit on the total number of points that can be deducted: <ul style="list-style-type: none"> • 3 points will be deducted if incompatible uses are adjacent to the site • 2 points will be deducted if incompatible uses are within 0.3 miles (approximately 500 yards) of the site: <ul style="list-style-type: none"> ○ Junk Yard, Public Dump, or Solid Waste Disposal ○ Pig Farm or Chicken Farm ○ Prison or Jail ○ Airport • Scoring consideration will also include, among other things, site suitability regarding topography (p. 24-25)
A7. Scoring or requirements that preference siting near mass transit.	[See A4b]
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 1 point is available to a development that is located in a Qualified Census Tract if it contributes to a concerted community revitalization plan (p. 26).
B1. Local participation in site selection is limited to statutory minimum. ⁸	No
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No
C2. Scoring that incentivizes affirmative marketing.	No
C3. Scoring that incentivizes 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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The applicant shall provide written documentation to the local PHA of its intent to develop a low-income multifamily rental development (p. 18)
F1. Incentives for larger family units.	[See G1]
F2. Incentives targeting families/families with children	[See G1]

⁸ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ 6 points to developments targeting low-income families (or individuals with children) with a minimum of 20% of the units having three or more bedrooms (if an applicant chooses 100% elderly, the applicant will not receive points for 3+ bedrooms) (p. 24) [points awarded to developments for the elderly OR low-income families OR disabled persons] (p. 22) ❖ Up to 14 points for percentage advantage of net LIHTC rents below the allowable rents for a 60% AMI unit of comparable multifamily rental developments in the area. 7 points for an application for reserving 10% of total units at 40% AMI and 7 points for reserving 10% of total units at 50% AMI (p. 23) ❖ 7 points for developments with units dedicated to serve households whose incomes are 30% or less of the AMI. Rents must be restricted accordingly. The number of units must be at least 5% of the total number of residential rental units in the development (p. 25)
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REPORTING REQUIREMENTS

<p>H1. Racial/demographic reporting requirements.</p>	<p>No.</p>
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OTHER CATEGORIES

<p>O1. Scoring that promotes units for persons with disabilities.</p>	<ul style="list-style-type: none"> ❖ 6 points for Supportive Housing for disabled persons with a minimum of 30% of units for such special needs' tenants (p. 22) [points awarded to developments for the elderly OR low-income families OR disabled persons]
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ 6 points to developments with 100% of the units in the development designed, equipped, and set aside for elderly (p. 23) [points awarded to developments for the elderly OR low-income families OR disabled persons]
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ 6 points for eventual tenant ownership. The applicant must submit the proposed right of first refusal contract to be offered for eventual tenant ownership OR

	<ul style="list-style-type: none"> ❖ 6 points for a signed statement which indicates the number of years the period of affordability will be extended. To receive points, the period of affordability must be at minimum 35 years (p. 27)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The applicant must include with its application a certification evidencing completion of 4 hours of fair housing training by principal of the development team (p. 17) ❖ AFDA requires that occupancy of all housing financed or otherwise assisted by AFDA be open to all persons regardless of race, color, religions, sex, handicap, familial status, or national origin (p. 29)
Change since 2015?	A4b; A6; B1; F1; F2; G1; O1/O2

<https://adfa.arkansas.gov/files>

Notes:

- Arkansas' job-creation incentives are based on payroll and use a tier system based on poverty rate, unemployment rate, per capita personal income and population growth to determine qualification criteria and benefits. Tiers are assigned annually based on current data. (<https://www.arkansasedc.com/why-arkansas/business-climate/incentives/pages/job-creation-incentives>)

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 100. A minimum score of 75 points is required to apply. 74 and below scored applications will not receive an award of 9% LIHTCs. No exceptions. QAP is such that point reduction is possible.

- The allocation of Tax Credits will be made only after the filing with the Authority of a Multifamily Housing Application (MFHA) which may set forth requirements, instructions, clarifications, and definitions application to a LIHTC application.
- AFDA will rank each Application according to the score awarded. In the event there is a tie in scoring for two or more Applications, the following are tie-breaker criteria:
 - Maximum number of affordable rental units produced

CHANGES SINCE 2015:

A4b: AFDA added a large point award for developments in an Area of Opportunity and implemented an Area of Opportunity Index to guide development.

A6: AFDA removed 4 provisions that received strong negative rankings in the last report: set aside for low-income counties, large point award for siting in low-income counties, set aside for projects in QCTs, and moderate point award for projects located in QCTs or DDAs (with no mention of a concerted

community revitalization plan). AFSA also added a included a low point deduction for site selection in proximity to incompatible uses.

B1: AFDA removed a strong negative local participation provision requiring the submission of a letter of support from the highest elected official in the area the project will be located in.

F1: Reduced large point award for development of housing for large families to a moderate point award.

F2: Removed small point award for marketing to single parent HHs with children.

G1: Added large point award for deeper income targeting.

O1/O2: Reduced large point award for development of Supportive Housing for disabled persons and the elderly to a moderate point award.

STATE: (California QAP 2022)	California Tax Credit Allocation Committee (CTCAC)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Set guidelines around geographic apportionment (see Notes on allowable percentages for each geographic area) (p. 12). ❖ Applicants proposing rehabilitation or demolition of occupied housing shall provide an explanation of the relocation requirements, and a detailed relocation plan including a budget with an identified funding source. Where existing low-income tenants will receive a rent increase exceeding 5% of their current rent, applicants shall provide a relocation plan addressing economic displacement. Where applicable, the applicant shall provide evidence that the relocation plan is consistent with the Uniform Relocation Assistance and Real Property Acquisition Policy Act and has been submitted to the appropriate local agency (p. 29).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<p>No.</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 15 points awarded for project amenities (including transit amenities, see A7) (p. 40-43). • Up to 3 points to projects located within 1/2 mile of a public park (1 mile for rural set-aside projects) or a community center accessible to the general public. 2

	<p>points if within 1 mile (or 2 miles for rural set-asides).</p> <ul style="list-style-type: none"> • Up to 3 points to projects located within 1/2 mile of a library (1 mile for rural set-aside projects); 2 points if within 1 mile (or 2 miles for rural set-asides). • Up to 5 points to projects located within 1/2 mile of a full scale grocery store (1 mile for rural set-aside projects); 4 points if within 1 mile (or 2 miles for rural set-asides); 3 points if within 1.5 miles (or 3 miles for rural set-asides) • Up to 3 points to a development wherein at least 25% of the residential unit shall be 3-bedroom+ units, the site is within ¼ mile of a public elementary school; ½ mile of a public middle school; or 1 mile of a public high school, (an additional ½ mile for each public school type for Rural set aside projects) and that the site is within the attendance area of that school. • Up to 3 points if located within ½ mile of medical clinic (1 for rural set-aside). • Up to 2 points if located within 1/2 mile of pharmacy (rural set aside: 1 mile). • Up to 3 points each for special needs/senior development projects within ½ mile of facility serving the target population. <ul style="list-style-type: none"> ❖ 8 points for a new construction Large Family housing type project, located in a census tract, or census block group as applicable, designated on the TCAC/HCD Opportunity Area Map as “Highest or High Resource” (p. 43). [see Notes] ❖ A tiebreaker awards up to 20 percentage points depending on a project’s siting in rural/non-rural area and location in a “High/Highest Resource Area” (p. 54). [see Notes]
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ [See A4b] Up to 3 points to a development wherein at least 25% of the residential unit shall be 3-bedroom+ units, the site is within ¼ mile of a public elementary school; ½ mile of a public middle school; or 1 mile of a public high school, (an additional ½ mile for each public school type for Rural set aside projects) and that the site is within the attendance area of that school (p. 42).

A6. Scoring that discourages development in distressed neighborhoods. ⁹	❖ (-) At risk set-aside (5%) for projects with expiring subsidies (p. 11). To qualify for this set-aside, at the time of application, at least 70% of tenants must have incomes <60% AMI (p. 72).
A7. Scoring or requirements that preference siting near mass transit.	❖ Up to 7 points for projects located within 1/3 mile of a bus rapid transit station, light rail station, commuter rail station, ferry terminal, bus station, or public bus stop with service at least every 30 minutes during the hours of 7-9 a.m. and 4-6 p.m. Monday-Friday, and the project's density will exceed 25 units per acre. Up to 3 additional points for projects that commit to provide free transit passes or discounted passes to residents priced at no more than half of retail cost (p. 40-41).
A8. Focus on and operationalization of a neighborhood revitalization plan.	❖ 2 points for projects in a QCT and the development would contribute to a concerted community revitalization plan as demonstrated by a letter from a local government official. The letter must delineate the various community revitalization efforts, funds committed or expended in the previous five years, and how the project would contribute to the community's revitalization (p. 49).
B1. Local participation in site selection is limited to statutory minimum. ¹⁰	❖ (-) First tiebreaker for applications for projects in City of LA and SF City and County is the presence of a formal letter of support for the project from either the SF Mayor's Office of Housing or the LA Housing Department respectively (p. 50).
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 in high-opportunity areas.	❖ Owner must certify annually that the owner has not refused to lease a unit to an applicant due to the applicant holding a HUD Section 8 voucher or certificate (p. 97).

⁹ 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.

¹⁰ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>F1. Incentives for larger family units.</p>	<ul style="list-style-type: none"> ❖ Two of the housing type categories are for large family projects (p. 12) (see Notes). 10 points for large family projects (p. 39). ❖ All large family projects shall provide outdoor play/recreational facilities suitable and available to all tenants, for children of all ages, except for small developments of 20 units or fewer. The Executive Director, in her/his sole discretion may waive this requirement upon demonstration of nearby, readily accessible, recreational facilities (p. 68-69).
<p>F2. Incentives targeting families/families with children</p>	<ul style="list-style-type: none"> ❖ 5 points for projects providing on-site childcare; up to 5 points for projects providing on-site afterschool care (max for 10 hours/week) (p. 35). Afterschool care points only available to projects in which at least 25% of units are 3+ bedroom (p. 45).
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ Up to 52 points for projects that set aside income targeted units. Income targeting may vary between 10-50% of low-income units and for tenants between <20-55% of AMI). Largest point amount (50) is for projects allocating 25% of low-income units to tenants ≤20% AMI or 35% of low-income units at ≤30% AMI. 2 additional points for projects that agree to have at least 10% of low-income units available to tenants with <30% AMI and to restrict the rents on these units accordingly (p. 47).
REPORTING REQUIREMENTS	
<p>H1. Racial/demographic reporting requirements.</p>	<p>No.</p>
OTHER CATEGORIES	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<ul style="list-style-type: none"> ❖ 2 points to projects that incorporate enhanced accessibility and visitability features (consistent with CA Building Code Chapter 11(b) and the principles of Universal Design) in at least half of project's low-income units (p. 49). <p>Overlap with O2</p>
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ Priority credits available under the Non-profit set aside (10% of credits) will be given to projects providing housing to homeless HHs. To qualify at least 50% of low-income units must house homeless HHs (p. 9). ❖ Two of the housing type categories are for special needs populations¹¹ and at-risk (p. 12) (see Notes).

¹¹ To be considered Special Needs housing, at least 45% of the LowIncome Units in the project shall serve populations that meet one of the following: are individuals living with physical or sensory disabilities and

	<p>10 points for special needs projects and at-risk projects. (p.39)</p> <ul style="list-style-type: none"> ❖ One of the housing type categories is for seniors projects (p. 12) (see Notes). 10 points for seniors projects. (p.39) ❖ 5 points for a case manager or a service coordinator for special needs projects (p. 45).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 1 point for projects that propose to make tax credit units available for eventual tenant ownership (p. 49).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	A7; D1; O4

QAP (2022): <https://www.treasurer.ca.gov/ctcac/programreg/2022/20220720/2022-Regulations.pdf>

NOTES:

Set-asides include Nonprofit (10%) with homeless priority (see O2), rural (20%), at-risk (5%), special needs (4%) (p. 9-11). Projects may select and compete in only one of the following housing type categories: large family (65%), large family new construction receiving the 30% tiebreaker increase for being located in census tracts, or census block groups as applicable, designated on the TCAC/HCD Opportunity Area Map as Highest or High Resource Areas (30%)*, SRO (15%), at-risk (15%), special needs (30%), senior (15%) (p. 11-12).

* A large family new construction project that receives a tiebreaker increase for being located in a Highest or High Resource census tract shall count against both that housing type and the general Large Family housing type.

Geographic apportionment outlined as follows: City of LA (17.6%), Balance of LA County (17.2%), Central Valley Region (8.6%), San Diego County (8.6%), Inland Empire Region (8.3%), East Bay Region (7.4), Orange County (7.3%), South and West Bay Region (6%), Capital Region (5.7%), Central Coast Region (5.2%), Northern Region (4.4%) and SF County (3.7%) (p. 12).

“In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened a group of independent organizations and research centers that would become the California Fair Housing Task Force, charged with creating an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.” California Fair Housing Task Force, “Methodology for the 2022

transitioning from hospitals, nursing homes, development centers, or other care facilities; individuals living with developmental or mental health disabilities; individuals who are survivors of physical abuse; individuals who are homeless; individuals with chronic illness, including HIV; homeless youth; families in the child welfare system for whom the absence of housing is a barrier to family reunification, as certified by a county; or another specific group determined by the Executive Director to meet the intent of this housing type.

TCAC/HCD Opportunity Map,” p. 3. <https://www.treasurer.ca.gov/ctcac/opportunity/2022/2022-hcd-methodology.pdf>

CHANGES SINCE 2015:

A7: Rating improved. CTCAC added provision awarding 3 additional points for providing free transit passes, raising the total number of available points in this category to 10, which qualifies as a strong positive provision.

D1/O4: The previous evaluation gave California a strong positive rating under this category. However, the provision cited for that rating is a federal minimum requirement in the LIHTC program. Since California’s QAP does not go beyond federal requirements in this category, the rating has been removed.

STATE: (Colorado QAP 2022)	State Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ For mixed income projects, CHFA requires that low-income set-aside units be distributed proportionately throughout each building and, to the extent possible, each floor of each building of the project and throughout the bedroom/bath mix and type. For projects that are 100-percent low-income, CHFA requires that, subject to the Code’s “available unit rule” requirements, the units at different targeting levels (40 percent AMI, 50 percent AMI, etc.) be distributed proportionately throughout each building, throughout the bedroom/bath mix and type, and, to the extent possible, throughout each floor or each building of the project. (p. 36)
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ [Guiding Principle] To provide for the distribution of Housing Credits across the State, including large urban areas, smaller cities and towns, rural, and tribal areas (p. 8) ❖ 5 points for projects that provide housing for mixed income. Low-income set-aside units are required to be distributed throughout the bedroom/bath mix and type. Both market-rate and low-income units must have the same design regarding unit amenities and square footage (p. 44).
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<ul style="list-style-type: none"> ❖ Sites will be evaluated based on suitability and overall marketability, including, but not

	limited to, proximity to employment, schools, shopping, public transportation, medical services, and parks/playgrounds; maximizing the allowable housing density; conformance with neighborhood character and land use patterns (p. 11)
A4a. Scoring that encourages development in high-income areas.	No.
A4b. Scoring that encourages development in high opportunity areas.	[see A7] ❖ 5 points for projects located in non-metro counties that have a population of 180,000 or less (p. 43)
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ¹²	<ul style="list-style-type: none"> ❖ As part of an MOU between HUD and CHFA, projects combining Housing Credit with these programs will be subject to a subsidy layering review by CHFA or HUD. The MOU requires that HUD and CHFA share information on the Applicant’s disclosure of sources and uses of funds and on project costs for all projects financed with a combination of Federal Credits and HUD housing assistance. This review is designed to ensure that such projects do not receive excessive assistance (p. 35) ❖ (-) Points may be earned if the area where the proposed project is located is experiencing housing problems, including those that: <ul style="list-style-type: none"> 1. Units with physical defects 2. Units that are overcrowded 3. Units that have a cost burden of greater than 30% of annual income for gross housing costs (p. 43) ❖ (-) 5 points for the rehabilitation of blighted buildings or locally or federally designated historic structures (p. 44) ❖ (-) 15 points for preservation projects which are defined as existing Tax Credit projects in

¹² 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>year 25 or later of their Extended Use period, or developments with project-based rental assistance or other operating subsidies guaranteed through a rental assistance contract that is within 3 years of expiration (p. 44)</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ [Guiding Principle] To provide opportunities for affordable housing within a ½ mile walk distance of public transportation such as bus, rail, and light rail with easy access to hob centers that maximize the housing density, and to promote opportunities for economic mobility (p. 8) ❖ 5 points may be earned for proposed projects to be located in a community that has an identified community housing priority or to be located at an existing or planned Transit-Oriented Development (TOD) Site (p. 43)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Guiding Principle] To give preference to projects in a QCT, the development of which contributes to a Concerted Community Revitalization Plan (p. 8) ❖ 1 point for projects located in a QCT that contribute to a Community Revitalization Plan, are an important part of a broader or comprehensive program of neighborhood improvement, and which have the capability of fundamentally changing the character of a neighborhood (p. 43) <p>[See A7]</p>
<p>B1. Local participation in site selection is limited to statutory minimum.¹³</p>	<p>No.</p>
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ [Threshold] for the proposed project, the Applicant must provide a completed Market Study and Walk Score Chart (p. 16) ❖ Along with the preliminary application, the Applicant must provide a Market Study prepared by an experienced market analyst, approved by CHFA who is totally

¹³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	unaffiliated with the applicant and has not financial interest in the project (p. 68)
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.	❖ 2 points may be earned by Applicants who enter into a written agreement with the local public housing representative to give priority to households on waiting lists for subsidized or public housing (p. 45)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	No
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ To be eligible for LIHTC, a project must meet one of three minimum set-aside thresholds: <ol style="list-style-type: none"> 1. 20% at 50% AMI; 2. 40% at 60% AMI; or 3. Average Income ❖ Additional Points will be awarded for projects that target extremely low-income residents <ul style="list-style-type: none"> • 5 points if 10% of units at or below 30% AMI • 10 points if 20% of units at or below 30% AMI • 15 points if 30% of total units at or below 30% AMI (p. 39-41)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	[See O2]
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ [Guiding Principle] To distribute Housing Credits to assist a diversity of populations in need of affordable housing, including individuals with children, senior citizens, Homeless Persons, and Persons in need of supporting housing (p. 8) ❖ CFHA has identified the following priorities: <ul style="list-style-type: none"> • Projects serving Persons experiencing Homelessness

	<ul style="list-style-type: none"> • Projects serving Special Populations • Projects in non-metro counties with a population of 180,000 or fewer <p>A project meets a priority only if it is awarded points for the priority as set forth in Section 5 Secondary Scoring Criteria (p. 9)</p> <p>❖ 15 points may be earned for the set-aside of at least 25% of the units for homeless or special needs tenant populations. Projects providing housing for these populations must provide a range of supportive services to the residents, at no cost to the residents, to receive additional points (p. 45)</p>
O3. Scoring to promote home ownership.	❖ CFHA will accept up to two Applications for projects wishing to convert to homeownership at the end of the 15-year compliance period. Such projects are limited to a maximum of 34 points and certain conditions will apply (p. 42)
O4. Provisions affirmatively furthering fair housing laws.	No
Change since 2015?	A1; A2; A4b; D2; O1/O2

2023-2024: <https://www.chfainfo.com/getattachment/0df7b450-1890-478d-831c-64047ded6e15/2023-24-QAP.pdf>

OVERALL ASSESSMENT

MINIMUM SCORE: All applications for the 9% Federal Credit must meet a minimum score of 130 points and all other Applications must meet a minimum score of 80 points under “Scoring Criteria”

Notes

- 2023-2024 QAP Second Draft was adopted on October 27, 2022. Items from the 2023-24 QAP are indicated by italics
- **[Nonprofit Set-Aside]:** The Code requires that at least 10 percent of the annual Federal Credit ceiling be set aside for the entire year for projects in which 501(c)3 or 501(c)4 nonprofit organizations own an interest in the project and materially participate in the project and the operation of the project throughout the compliance period. Such nonprofit organizations may not be affiliated with, nor controlled by, a for-profit organization.

CHANGES SINCE 2015:

A1: CHFA added a requirement that units be distributed proportionally in mixed income projects and units at different targeting levels (40 percent AMI, 50 percent AMI, etc.) be distributed proportionately throughout each building for a moderate/weak positive ranking.

A2: Added a moderate point award for mixed income housing projects.

A4b: Added a moderate point award for projects located in non-metro counties that have a population of 180,000 or less.

D2: CHFA no longer requires final application package to include an agreement with local public housing authority that the project is accepting tenants from their waitlist. Strong positive ranking removed.

O1/O2: Projects serving Persons experiencing Homelessness and Special Populations are priorities. CHFA also added a large point award for setting aside 25% of units for homeless and special needs populations.

STATE: Connecticut (QAP 2022-23)	Connecticut Housing Finance Authority (CHFA)
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.	❖ Up to 6 points awarded for mixed income housing (p. 17).
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.	<ul style="list-style-type: none"> ❖ Up to 9 points awarded for developments located in an “Area of Opportunity”* (p. 25). ❖ 2 points under “Transit Oriented Development”** are awarded for proximity to amenities, described as public developments located within two miles (driving distance) of grocery stores, variety shopping, pharmacies, medical and dental facilities, hospitals, doctor’s offices, clinics, daycare facilities, banks, parks, community centers, sports facilities swimming pools, gardens, or hiking trails (p. 22).
A5. Scoring or requirements that preference siting near high-quality schools.	❖ 1 point under “Transit Oriented Development”** is awarded for proximity (within two miles driving distance) to schools (p. 22).
A6. Scoring that discourages development in distressed neighborhoods. ¹⁴	❖ 1 point awarded for developments located in a QCT or DDA (p. 23)
A7. Scoring or requirements that preference siting near mass transit.	❖ 2 points under “Transit Oriented Development”** are awarded for proximity to transit, described as developments located within a half mile of public transit facilities (p. 21).

¹⁴ 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.

	<ul style="list-style-type: none"> ❖ 1 point each awarded to proposed developments with boundaries that intersect a ½ mile buffer surrounding existing or planned mass transit stations and proposed developments with local bus service 7 days a week within ½ mile of the proposed development as measured by a pedestrian’s path (p. 21).
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 3 points awarded for a “Concerted Community Revitalization Plan”*** (p. 24).
B1. Local participation in site selection is limited to statutory minimum. ¹⁵	
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold Req.] Applicants must commit to making ongoing efforts to request that PHAs in the local market area include relevant information about the Proposed Development on any listing that the PHA makes available to persons on its waiting list(s), and to persons least likely to apply (p. 10).
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.	<ul style="list-style-type: none"> ❖ [Threshold Req.] Applicants must commit to give preference in its tenant selection plan to eligible households on waiting lists of the public housing authority(ies)in the local market area, subject to HUD regulations, and (b) make on-going efforts to request that the PHA make referrals to the Proposed Development, or request that the PHA include relevant information about the Proposed Development on any listing that the PHA makes available to persons on its waiting list(s), and to persons least likely to apply (p. 10). ❖ [Threshold Req.] Proposed developments in LIHTC program shall be affordable to current residents (if any) so that no permanent displacement is required for reasons of affordability (p. 9).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 1 point awarded for “Family Developments,” defined as developments that are not age restricted

¹⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	and contain a mix of bedroom sizes, with more than 50% of the development’s total units containing two or more bedrooms (p. 22).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Up to 8 points awarded for projects that create rental units dedicated to households and individuals with income at or below 30% AMI (p. 17).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ QAP states that the 2008 HERA Law requires CHFA to report tenant data to HUD annually, including tenant race, ethnicity, family composition, age, income, use of rental assistance or other similar assistance, disability status, and monthly rental payments (p. 30).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	No.
O2. Scoring that promotes units for special needs populations.	❖ Up to 6 points awarded for supportive housing units, specifically for residents identified as homeless or chronically homeless (p. 17).
O3. Scoring to promote home ownership.	❖ (+)(-) [Threshold Req.] If the Application includes a proposal to establish tenant ownership of the Proposed Development (or all of the individual units) after the initial 15 year compliance period, the Application shall include a specific and credible plan that demonstrates owner capacity and identifies the resources necessary for tenant organization and representation, the acquisition(s), and all transaction costs (p. 10).^
O4. Provisions affirmatively furthering fair housing laws.	❖ Up to 2 points awarded to Proposed Developments that include staffing of a resident services coordinator engaged in accordance with the Authority Guidelines, the objectives of the Plan, to increase diversity and bridge differences amongst residents regardless of race, disability, social, educational or cultural backgrounds, and to provide outreach and incentives necessary to attract and retain, as residents, individuals and families from historically marginalized racial and ethnic groups, immigrants, and those least likely to apply for housing at the Proposed Development (p. 18).
Change since 2015?	A2; A4a; A4b; A5; A6; A8; B1; C1; D1; F2; G1; O2

QAP (2022-23): [https://www.chfa.org/assets/1/6/FINAL_2022-23_QAP_\(July_2021\).pdf](https://www.chfa.org/assets/1/6/FINAL_2022-23_QAP_(July_2021).pdf)

NOTES:

* “Development Located in an Area of Opportunity” shall mean a Proposed Development with non-age restricted units of which more than 50% of the Proposed Development’s total units contain two or more

bedrooms, and that is located in a municipality with measured improvements in family outcomes in education, employment and neighborhood domains (QAP, p. 25)

** Transit-oriented development means the development of residential, commercial and employment centers within one-half mile or walking distance of public transportation facilities, including rail and bus rapid transit (i.e., CT Fastrak) and services, that meet transit supportive standards for land uses, built environment densities and walkable environments, in order to facilitate and encourage the use of those services (Glossary of LIHTC Terms, p. 19

https://www.chfa.org/assets/1/6/2022_and_2023_LIHTC_Glossary_of_Terms_-_Final.pdf?10320)

*** “Concerted Community Revitalization Plan” means a plan that is formally adopted by the State, municipality, or other regional, community or municipally recognized organization or group with a coordinated and comprehensive approach to revitalize a defined geographic area that includes the site of the proposed housing development along with specific investments committed by the State, municipality, or other regional, community or municipally-recognized organization or group in non-housing infrastructure, amenities, or services (Glossary of LIHTC Terms, p. 7).

^This provision is counted as both a positive and negative provision. Although it is positive that tenant ownership is referenced, the requirement of a specific and credible plan may also be burdensome to developers wanting to encourage tenant ownership.

CHANGES SINCE 2015:

A2: CHFA added scoring to encourage mixed income development, which discourages racial and economic concentration.

A4a: Rating removed. The QAP reviewed in the previous evaluation included moderate/weak positive provisions for scoring that encourages development in high income areas. These provisions, awarding points for projects in communities with high single family home percentages and communities with low affordable housing percentages are no longer present.

A4b/A5: Rating added. CHFA added provisions with scoring that encourages development in high opportunity areas and scoring that preferences siting near schools.

A6: Rating improved. CHFA removed a strong negative provision and a few moderate/weak negative provisions but retained the preference for development in QCTs and DDAs.

A8: Rating added. CHFA added scoring that encourages use of a neighborhood revitalization plan.

B1: Rating removed. Scoring which encouraged local participation in site selection was removed since the last QAP evaluation.

C1: Rating added. CHFA added a threshold requirement that applicants commit to making efforts to request that local PHAs provide relevant information on the proposed development two people least likely to apply.

D1: Rating improved. The moderate/weak positive provision that awarded points for no permanent displacement of residents is now a threshold requirement, warranting a strong positive rating.

F2: Rating added. CHFA added scoring encouraging family developments.

G1. Rating downgraded. Strong positive provision giving priority to projects that create/preserve rental units to households with incomes <50% of AMI was removed since last QAP evaluation.

O2: Rating downgraded. Strong positive provision giving exceptional priority to projects that demonstrate a high priority for special needs populations was removed since last QAP evaluation.

STATE: Delaware: (QAP 2021-2022)	Delaware State Housing Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ [Threshold Requirement] No development will be eligible to compete for an allocation of credits if the application requires that existing residents be involuntarily and permanently relocated due to income ineligibility for tax credit purposes (QAP, p. 31)
A2. Scoring that discourages racial and economic concentration.	❖ Up to 10 points will be awarded as provided below to a development where the percentage of units based on the total unsubsidized units in the development are market rate and not rent-restricted or income-restricted: <ul style="list-style-type: none"> • 2 points if 10% of units are neither income nor rent restricted • 4 points if 15% • 6 points if 20% • 8 points if 25% • 10 points if 30% (p. 51)
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.	❖ In order to balance housing investments and encourage the creation of affordable housing opportunities within areas of the state that contain little or no affordable rental housing opportunities but may offer economic opportunity, proximity to workplaces, high performing schools, and/or supportive infrastructure, points will be awarded to family development proposals located in Areas of Opportunity:

	<ul style="list-style-type: none"> • 0 points for 0%-49.9% of total units located in areas of opportunity • 7 points for 50%-99.9% of total units located in areas of opportunity • 15 points for 100% of total units located in areas of opportunity (p. 43) <ul style="list-style-type: none"> ❖ Up to 12 points: for projects in municipalities and incorporated areas, the amenity must be within the noted radius of the project to be eligible for points. (p. 44) [See notes]
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ 2 points if the development is located within .5 miles of a public school; 1 point if the development is located within a mile of a public school (p. 45)
<p>A6. Scoring that discourages development in distressed neighborhoods.¹⁶</p>	<ul style="list-style-type: none"> ❖ (-) [Priority Need] Preservation of the state’s existing affordable housing properties, especially subsidized properties and sites in poor physical condition (p. 20) ❖ (-) Up to ten (10) points will be awarded for the leveraging of permanent funding sources not controlled by DSHA. (p. 53)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ A development will be awarded up to 5 points for including development amenities and facilities to accommodate new transit. To score these points, applicant must demonstrate the site is transit ready and is providing new public transit infrastructure/amenities (p. 44)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 5 points for an on-site community center. The community center should be of sufficient size to accommodate the residents and services (if provided). The community center shall include a computer/business center equipped with computers, printers, and other technology for residents’ access. (p. 40) ❖ DSHA will award up to 5 points to applicants that commit to providing

¹⁶ 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>certain qualified social services [See notes] to the proposed development’s residents.</p> <ul style="list-style-type: none"> • 2 points for 1 qualified social service • 3 points for 2 qualified social services • 5 points for 3 qualified social services <p>❖ Developments located in QCTs that contribute to an eligible Concerted Community Revitalization Plan (CCRP) will receive 10 points. No points will be awarded in this category to projects located in QCs that do not contribute to an eligible CCRP (p. 43)</p> <p>❖ Where all of a proposed development’s buildings and parcels are located within a certified Downtown Development District (DDD), or a designated Opportunity Zone (OZ) and contribute to an eligible CCRP, the application will receive 10 points. Any development where all buildings and parcels are located within a certified DDD or designated OZ will receive a minimum of 2 points irrespective of its contribution to an eligible CCRP (p. 43)</p>
<p>B1. Local participation in site selection is limited to statutory minimum.¹⁷</p>	<p>No.</p>
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<p>❖ In order to demonstrate the need and demand for the proposed development in a market area, a comprehensive market study of the housing needs of low-income individuals in the area to be served by the development must be completed by a market analyst approved by DSHA (p. 33)</p> <p>❖ If a property receives funding from the following sources; HOME funds, Housing Assistance Payment (HAP) contract funds, HDF funds, or the LIHTCs were allocated in 2002 to present, an Affirmative Fair Housing Marketing Plan (AFHMP) must be reviewed and approved by either</p>

¹⁷ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>DSHA or HUD. This plan must be updated every five (5) years. (p. 73)</p> <ul style="list-style-type: none"> ❖ If a low-income unit in the project became vacant during the year, reasonable attempts were or are being made to rent that unit or the next available unit of comparable or smaller size to tenants having a qualifying income before any units in the project were or will be rented to tenants not having a qualifying income (p. 74)
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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ Applicants must agree to market their developments to the local public housing waiting lists and/or Section 8 existing waiting lists (p. 35) ❖ [Compliance Monitoring] Documentation that the owner has not refused to lease a unit in the project to an applicant because of any protected status, including VAWA history, or because the applicant holds a voucher or certificate of eligibility under Section 8 of the United States Housing Act of 1937 or any State of Delaware rental assistance program (p. 72)
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 2 points if the project is a family development (p. 39)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ [Priority Need] Creation of new affordable rental housing, especially in areas of opportunity for low-income households (p. 20) ❖ Up to 20 points will be awarded based on the development average of AMI targeting calculated by bedroom. (p. 48)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	

<p>O1. Scoring that promotes units for persons with disabilities.</p>	<p>[See O4]</p> <ul style="list-style-type: none"> ❖ Up to five (5) points will be awarded for Management Agents with portfolios containing Delaware Section 811 contracts and Target Units. Points will be awarded based on the percentage of 811 units under contract or Target Units occupied by qualified tenants: <ul style="list-style-type: none"> • 2 points if 65-80% occupied by qualified tenants • 5 points if >80% occupied by qualified tenants (p. 55)
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ [Priority Need] Integrated, affordable units for people with disabilities and extremely low incomes, and other special populations that may need supportive services and rental assistance to live independently (p. 20) ❖ All units are required to target either: <ol style="list-style-type: none"> 1. The greater of the 5% of the total units or 3 units for special population-eligible households with household incomes and rents at 40% AMI or below; or 2. The greater of 5% of total units or 3 units for permanent supportive housing units (p. 32) [See notes] ❖ 10 points will be awarded to applicants who increase the number of target units set aside for special population-eligible units to the greater of 10% or 6 units. In order to score additional points, special population-eligible units must be designated for households with incomes no greater than 30% of AMI and in one or more of the following categories: <ul style="list-style-type: none"> • Persons with HIV/AIDS-related illness; • Homeless • Survivors of Domestic Violence • Persons with Disabilities; and • Youth exiting foster care or persons exiting state-run institutions. (p. 49)

<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ 10 points will be awarded to developments that will be converted to homeownership for the residents after the initial 15-year compliance period has expired. Applicants must submit a detailed marketing plan which includes projections on maintenance, tenant reserve funds, homeownership training, continued affordability, sales price calculation, lease/purchase agreements, etc. (p. 39)
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ All applicants must comply with the provisions of all federal, state, and local laws prohibiting discrimination in housing on the grounds of any protected class including race, color, sex, creed, handicap/disability, and familial status, sexual orientation, or natural origin...All applicants must comply with all applicable provisions of VAWA, including prohibition from discrimination in tenancy on the basis of applicant’s history as a victim of a VAWA crime (p. 31) ❖ 3-5 points are awarded for developments that exceed the Fair Housing minimum requirement threshold of maintaining 5% of the total unity count as full-accessible units (p. 50) ❖ [Compliance Monitoring] No findings of discrimination under the Fair Housing Act, 42 U.S.C. §§ 3601-3619, occurred for the project. A finding of discrimination includes an adverse final decision by the Secretary of Housing and Urban Development, 24 C.F.R. § 180.680, an adverse final decision by a substantially-equivalent state or local fair housing agency, 42 U.S.C. § 3616(a)(1), or an adverse judgment from a federal court (p. 73)
<p>Change since 2015?</p>	<p>A2; A5; A7; A8; F2; O2; O3</p>

2023-2024: http://www.destatehousing.com/Developers/lihtc/2023/2023_qap.pdf

NOTES

[Social Services] The services must be distinct to qualify for the points. Social services must be actively linked to residents and not simply provided to the community at large. Minimum service thresholds must be met for each service point sought, including:

1. The service must be provided to the development’s residents for at least four (4) hours in every calendar quarter for a total of sixteen (16) hours per year;
2. Services must be provided free of charge to the tenants and be appropriate, available, and accessible;

Services may include: Parenting Programs, Literacy Programs, Daycare, Job Training, Nutritional Programs, Financial Counseling, Transportation, Public Benefits Counseling – such as providing support to help tenants determine eligibility and apply for public benefits, and Exercise/Healthy Lifestyle.

Additional social services may be approved in advance by DSHA.

[Amenities]

Amenities	Distance measured along existing right of way	
	≤ .5	≤ 1
Grocery of at least 10,000 sq. ft. and sufficient food to maintain daily food consumption	3	2
Walk-in medical facility / hospital	3	2
Walk / Bike Trail	2	1
Pharmacy	2	1
Child Care (family) / Senior Center (senior)	2	1
Public School (family sites only)	2	1
Library	2	1
Park	2	1
Central Business Districts*	2	1
Community, civic, or town center open to public	2	1
Fixed Route Transit Stop	2	1
Bank	1	.5
Department or clothing store	1	.5
Hardware Store	1	.5
Post Office	1	.5
Indoor Fitness	1	.5
Community facilities: place of worship, community garden, cultural arts, police, or fire station	1	.5
Amenities	Distance measured as radius	
	≤ .25	≤ .5
Public Airport	-3	-2
Active landfill / dump / junkyard	-3	-2
Jail, prison, or detention center	-2	-1
Railroad	-2	-1
Heavy Industry	-2	-1

*Central Business District as defined by the Office of State Planning

[Special Needs Populations] The mandatory Fair Housing requirement of 5% fully-accessible units will not automatically satisfy this threshold

OVERALL ASSESSMENT:

Minimum Score: Competitive applications that meet the minimum threshold requirements will be scored and ranked based on the point system for the particular pool in which they compete. All

applicants for 9% competitive credit must score a minimum of 100 points to be eligible for an award of tax credits. Applications for 4% non-competitive credit must score a minimum of 75 points to be eligible for an award of tax credit.

Total Possible Points: The total possible points that can be awarded are 221 with bonus points available upon qualification.

Changes Since 2015:

- A2: now specifies a point allocation for developments that are not income-restricted
- A5: the amenities points chart [see above] specifies points for sitting near public schools – there is no mention of school quality, however
- A7: QAP no longer mentions transit friendly projects
- A8: expanded to include more points and provisions related to revitalization
- B1: it seems like criteria of written commitment has been removed (?)
- F2: Points added for family developments
- O2: eligible points for special population set-aside doubled
- O3: 4 additional points awarded for developments that will convert to home ownership

STATE: Florida (QAP 2022)	Florida Housing Finance Corporation
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	
A2. Scoring that discourages racial and economic concentration.	
A3. Mandatory requirements for development in high-opportunity areas	
A4a. Scoring that encourages development in high-income areas.	
A4b. Scoring that encourages development in high opportunity areas.	
A5. Scoring or requirements that preference siting near high-quality schools.	
A6. Scoring that discourages development in distressed neighborhoods. ¹⁸	
A7. Scoring or requirements that preference siting near mass transit.	
A8. Focus on and operationalization of a neighborhood revitalization plan.	Preference given to projects located in qualified census tracts

¹⁸ 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.

	[Selection Criteria] Projects characteristics including housing as part of a community revitalization plan
B1. Local participation in site selection is limited to statutory minimum. ¹⁹	
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	
C2. Scoring that incentivizes affirmative marketing.	
C3. Scoring that incentives language access and marketing to non-English speakers.	
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	[Selection Criteria] Public housing waiting lists
F1. Incentives for larger family units.	
F2. Incentives targeting families/families with children	[Selection Criteria] Tenant populations of individuals with special needs
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	Preference given to development serving the lowest-income tenants
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	5% of the Allocation Authority will be reserved for affordable housing projects that target persons who have a disabling condition
O2. Scoring that promotes units for special needs populations.	[Selection Criteria] Tenant populations with special needs
O3. Scoring to promote home ownership.	[Selections Criteria] Projects intended for eventual tenant ownership
O4. Provisions affirmatively furthering fair housing laws.	
Change since 2015?	

[https://www.floridahousing.org/docs/default-source/programs/developers-multifamily-programs/competitive/2022-qualified-allocation-plan-\(qap\).pdf?sfvrsn=d5a1f57b_2](https://www.floridahousing.org/docs/default-source/programs/developers-multifamily-programs/competitive/2022-qualified-allocation-plan-(qap).pdf?sfvrsn=d5a1f57b_2)

STATE: Georgia (QAP 2022)	Georgia Housing and Finance Authority (GHFA); GA Dept. of Community Affairs (DCA)*
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	

¹⁹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>No.</p>
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 1 point awarded to mixed income developments projects. Either: at least 10% unrestricted market rate units OR make the income averaging minimum set-aside election (Appx. II, p. 18). ❖ DCA awards up to 5 points for projects located in or near low-poverty communities (See A4a.)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ Up to 5 points awarded for projects in or near low-poverty communities. 5 points for projects in census tract <5% below FPL for Metro applications and <10% for Rural applications; 4 points for projects within ¼ mile of census tracts above; 4 points for projects in census tract <10% below FPL for Metro applications and <15% for Rural applications; 3 points for projects within ¼ mile of such census tracts; 3 points for projects in census tract <15% below FPL for Metro applications and <20% for Rural applications (Appx. II, p. 17).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 20 points for projects located within a 1.5 mile walk/drive (Metro Pools) and 2.5 miles (Rural Pool) of the following ‘desirable activities/characteristics.’ More points are awarded for closer proximity (Appx. II, p. 5-6): <ul style="list-style-type: none"> - Up to 2.5 points each: national big box general merchandise store, supermarket/grocery store, hospital, medical care provider, pharmacy, child care service, school, traditional town square, community or recreational center, public park/public community garden > 25,000 sq. ft., and public library - Up to 2 points each: retail clothing department store, restaurant, technical college, public park/public community garden < 25,000 sq. ft., fire/police station, federally insured banking institution, place of worship, and post office. ❖ Up to 5 points for projects located in census tracts with employment rate and/or median income over 60th percentile (also related somewhat to A2 and A4a) (Appx. II, p. 18).

<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ Up to 3 points for projects in a “Quality Education Area.”** For a school to qualify it cannot have district-wide enrollment unless the school is the only school in the district; must serve grades K-12; and cannot conduct student admission on a selective basis (e.g., lottery, competitive application). Additionally, each school must <u>either</u>: have College and Career Readiness Performance Index (CCRPI) scores above the average posted on DCA’s website; receives 2018 or more recent “Beating the Odds” designation [see Notes]; or both (1) have positive average year-over-year change in CCRPI score between 2015 and 2019 (excluding changes between 2017 and 2018, due to CCRPI methodology adjustment) <u>and</u> (2) have average CCRPI score over the same time period in the top 75% of all statewide average scores for the grade cluster (Appx. II, p. 9-10).
<p>A6. Scoring that discourages development in distressed neighborhoods.²⁰</p>	<ul style="list-style-type: none"> ❖ 2 points deducted for each ‘undesirable activities/characteristics’ within ¼ mile of the project. These may include but are not limited to (Appx. II, p. 6-7): <ul style="list-style-type: none"> - Inappropriate property uses (e.g., dumps, landfills, material storage areas, commercial livestock operations) - Potential or existing environmental hazards - Abandoned houses or buildings that are unoccupied, unsecured buildings that depress a neighborhood’s physical appearance, diminish living conditions and/or safety and decrease marketability. Or deteriorated buildings that contribute to these same outcomes. - Extensive mitigation activities required which translate to a less efficient use of resources (e.g., extensive noise mitigation costs) - Located in a USDA-defined food desert. ❖ (-) Up to 4 points for projects that have an award of new government-funded project-based rental assistance for 40-80+ units (Appx. II, p. 33). [To the extent that this PBRA is

²⁰ 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.

	located in distressed neighborhoods, this may work as a negative.] Also applies to G1.
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ 6 points to Metro Pool Applications proposing a site owned by a public or local transit agency. Up to 5 points to Metro Pool Applications that propose a site within walking distance of a transit hub (Appx II., p. 8). <p>OR</p> <ul style="list-style-type: none"> ❖ Up to 3 points to Metro Pool Applications that propose a site within walking distance of a public transportation stop, OR 1 point to Metro Pool Applications for which a publicly operated/sponsored on-call transportation service is available on-site, OR 2 points to Rural Pool Applications demonstrating that a publicly operated/sponsored transit service will provide a reliable and available transportation option to all residents (Appx II., p. 9).
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 5 points for projects with a Community Revitalization Plan (Appx. II, p. 11). ❖ Up to 10 points for projects that have received a HUD Choice Neighborhoods Implementation Grant (Appx. II, p. 19).
B1. Local participation in site selection is limited to statutory minimum. ²¹	<ul style="list-style-type: none"> ❖ (-) Community Revitalization Plans must be officially approved or re-approved by a Local Government within 10 years of Application submission (Appx. II, p. 11). ❖ (-) 1 additional point to projects with Community Revitalization Plan if the Local Government solicited public input and engagement during CRP creation (Appx. II, p. 11).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold Req.] All Applicants selected for an award of Credits must prepare and submit an Affirmative Fair Housing Marketing Plan outlining how the project will market units to underserved residents including residents with disabilities (Appx. I, p. 40-41).
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentives language access and marketing to non-English speakers.	<ul style="list-style-type: none"> ❖ [Threshold Req.] Affirmative Fair Housing Marketing Plan must include formal documented strategy and outreach examples

²¹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	for individuals with Limited English Proficiency (LEP) for languages identified as being prevalent in the surrounding market area (Appx. I, p. 41).
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.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	❖ [Threshold Req.] All applicants must designate the proposed development as targeting either families or seniors (Appx. I, p. 9).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ 2 points to applications with an overall property area median income equal to or less than 58%. PBRA and public housing units can be used to claim points in this category. Or 3 points for projects that have an award of new government funded project-based rental assistance for at least 30% of total units for a minimum of 10 years (Appx. II, p. 4)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ [Threshold Req] At least 5% of total units must be equipped for the mobility disabled; at least 2% of total units must be equipped for hearing and sight-impaired (Appx. I, p. 26). ❖ One of DCA’s State Priorities is a strong commitment to provide Integrated Housing options for Persons with Disabilities (p. 7). ❖ DCA will award 1 point to projects that agree to accept Section 811 PBRA for up to 20% of units (Appx. II, p. 31). ❖ DCA will award 1 point to Applications with a commitment of HUD Section 8 project-based rental assistance from a PHA which has elected to offer a tenant selection preference in their tenant Voucher programs for a minimum of 15% of the total units for persons with specific disabilities (also related to D1) (Appx. II, p. 31).
O2. Scoring that promotes units for special needs populations.	❖ [Threshold Req.] All applicants must designate the proposed development as targeting either families or seniors (Appx. I, p. 9).

O3. Scoring to promote home ownership.	❖ 1 point to Owners that commit to submit a plan for resident ownership at the end of the 15-year Compliance Period [Note: only single-family styled units are eligible for this point and projects must submit a viable homeownership strategy to DCA.] (Appx. II, p. 21)
O4. Provisions affirmatively furthering fair housing laws.	❖ [Threshold Req.] It is the policy of DCA to administer the HTC Program affirmatively, as to achieve a condition in which individuals of similar income levels in the same housing market area have a like range of housing choices available to them regardless of their race, color, religion, sex, disability, familial status or national origin. All Applicants selected for an award of Credits must prepare and submit an Affirmative Fair Housing Marketing Plan outlining how the project will market units to underserved residents including residents with disabilities [see also C1] (Appx. I, p. 40).
Change since 2015?	A8; B1; C3; F2; O1

QAP (2022):

https://www.dca.ga.gov/sites/default/files/2022qualifiedallocationplan_boardapproved.pdf

- Appendix I contains threshold criteria
- Appendix II contains scoring criteria

NOTES:

*By state law, the Georgia Department of Community Affairs administers the programs of the Georgia Housing and Finance Authority.

**Quality Education Areas Scoring Resource:

https://www.dca.ga.gov/sites/default/files/quality_education_areas_-_scoring_guidance_and_data_0.pdf

114 total points available for 9% credits for new supply.

Certain requirements, including within scoring criteria, vary by pool. 35% of available 9%-credits are awarded to projects in rural areas (Rural Pool), 30% are awarded to Fulton, DeKalb, Gwinnett, and Cobb counties (Atlanta Metro Pool), and 35% are awarded to areas not in Rural Pool or Atlanta Metro Pool (Other Metro Pool). DCA will redistribute any unused 9% Credits to fund additional Applications in one or more Pools in the following order: Rural, Other Metro, Atlanta Metro (p. 9).

DCA will: select only one Rural Application located in the same Local Government Boundary, select up to two Metro Pool Applications located in the same Local Government Boundary, and allocate up to 10% of Credits, excluding set asides, among Applications for funding in the City of Atlanta (p. 20).

[Threshold] DCA will not allow permanent displacement of tenants, if avoidable. If Applicant anticipates displacing tenants, they must include a detailed displacement plan which sets forth the specifics of the displacement, including a projected budget and an explanation of efforts planned to mitigate the impact of displacement. Any displacement of tenants will be subject to DCA’s prior written approval (Appx. I, p. 39).

[Since it appears these communities can be anywhere, it does not fit well with any of the categories above]. 2 points to projects that contribute to a DCA Georgia Initiative for Community Housing community. Letter must identify the boundaries of their GICH community, identifies the project as located within their stated GICH community boundaries, and is executed by the GICH community’s primary or secondary contact on record (Appx. II, p. 25).

CHANGES SINCE 2015:

A8: 2022 QAP gives more points for projects that have received a HUD Choice Neighborhoods Implementation Grant than the previously evaluated QAP. Moderate/weak positive rating increased to strong positive rating.

B1: Strong positive provision which limited local participation in site selection is no longer present, and rating decreased to moderate/weak negative.

C3: 2022 QAP contains explicit requirement of outreach to individuals with Limited English Proficiency. There was no mention in previously evaluated QAP and this is a strong positive provision.

F2: DCA added a threshold requirement where applicants must designate proposed projects as either targeting families or seniors. This is a strong positive provision and no rating was giving for this measure in prior QAP.

O1: DCA added a threshold requirement that 5% of total units must be equipped for the mobility disabled and at least 2% of total units must be equipped for hearing and sight-impaired. One of the State’s priorities is a strong commitment to provide Integrated Housing options for Persons with Disabilities. Neither of these provisions were present in previously evaluated QAP and moderate/weak positive rating is increased to strong positive.

O2: Same as F2.

STATE: Hawaii (QAP 2022-23)	Hawaii Housing Finance and Development Corporation (HHFDC)
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.	❖ (-) Criterion 2: County Income Adjuster awards up to 3 points for projects located in counties with lower MTSP income limits (p. 14).
A3. Mandatory requirements for development in high-opportunity areas	No.

<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ (-) See A2—Criterion 2. <p>[Not scoring but still a mechanism to strongly incentivize development in high-income areas] Newly constructed buildings located outside of DDAs or QCTs qualify as a high-cost area. The additional LIHTC available from the ‘basis boost’ will be used to offset the high cost of construction and land throughout the state (p. 36).</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Criterion 8: Project location and market demand awards 4 points to projects located in a County’s urban core; 3 points if located in an urbanized area; 2 points if located in a master planned community; 1 point if located in a rural district in proximity to employment opportunities and medical and educational facilities (p. 18-19).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ “Educational facilities” in Criterion 8 (see A4b) is not defined, but could be a positive provision.
<p>A6. Scoring that discourages development in distressed neighborhoods.²²</p>	<ul style="list-style-type: none"> ❖ (-) Up to 7 points for projects that are receiving, for the first time, project-based rental subsidies that would results in eligible tenants paying 30% of their income toward rent. 7 points if the entire project has project-based subsidies. If only a portion of a project has project-based subsidies, then scoring is based on this percentage (1-6 points) (p. 17). [To the extent that this PBRA is located in distressed neighborhoods, this may work as a negative.] Also applies to G1. ❖ (-) See 1 point for projects located in QCT (see A8).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ Project may earn 2 points for availability of a mass transit station/stop within ½ mile. For Oahu, the term “mass transit” is exclusive to rail. For the neighbor islands, the term “mass transit” is not exclusive to rail (p. 19).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 1 point if project is located in a QCT. The project will redevelop existing housing which contributes to a concerted community revitalization plan as determined by HHFDC (e.g., site is located in an Enterprise Community, Empowerment Zone, or part of a County redevelopment plan). To receive consideration

²² 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.

	for this criteria, applicant must provide an explanation on how this project is in compliance with such plan and its benefit to the overall community. Applicant must provide a letter of interest or a binding agreement with the government agency administering the community revitalization plan (p. 24).
B1. Local participation in site selection is limited to statutory minimum. ²³	No.
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.	❖ [Threshold Req.] All low-income units must be made available to people on the waiting list for low-income public housing and or/an acceptable shelter program. Applicant must provide a certification, a copy of a letter sent to the HI public housing authority verifying this, and a copy of the letter submitted to HI Dept. of Human Services, Homeless Programs Office (p. 7).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	❖ Up to 2 points for providing larger units which are available to individuals with children or large families. 1 point for 20%-39% of total units with 2+ bedrooms. 2 points for 40% or more of the total units with 2+ bedrooms (p. 20).
F2. Incentives targeting families/families with children	❖ See F1.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	As noted in A6, points given for subsidy layering which could also make units more available for lowest-income HHs (p. 17). ❖ Project may receive up to 10 points for providing preference to lower income tenants. Based on what percentage of units are offered at 30%, 40%, 50%, or 60% AMI (p. 22).

²³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ [Under reporting requirements] Annual submission of required tenant data in accordance with the Housing and Economic Recovery Act of 2008 (p. 1). [this implies reporting of demographic information, though is certainly not specific to this point].
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ See O2. “Special housing needs” mean persons for whom social problems, age or physical or mental disabilities impair their ability to live independently, and for whom such ability can be improved by more suitable housing conditions. Persons with special housing needs may include persons with physical or mental disabilities or persons who are homeless (p. 21).
O2. Scoring that promotes units for special needs populations.	❖ Projects may receive up to 2 points if it commits to provide services that will enhance the livability of the project for tenant populations with special housing needs (p. 21).
O3. Scoring to promote home ownership.	❖ 1 point for offering tenants an opportunity for home ownership. Right of first refusal in accordance with Section 42(i)(7) of the Code Applicants must provide a feasibility analysis addressing the tenant’s ability to purchase the project as well as a plan discussing how the project will offer the units for homeownership to tenants (p. 23).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	A2; A4a; A5; A7; D1; G1

QAP (2022-23): <https://dbedt.hawaii.gov/hhfdc/files/2021/12/2022-2023-Qualified-Allocation-Plan-12-17-21.pdf>

NOTES:

120 total points available.

CHANGES SINCE 2015:

A2: Added a County Income Adjuster criterion which uses HUD’s Multifamily Tax Subsidy Income limits to award points to projects sited in counties with lower income limits.

A4a: Same as A2.

A5: QAP now makes mention of educational facilities where there was none in previously evaluated QAP.

A7: Added provision that awards points for proximity to mass transit.

D1: Changed small point award for making low-income units available to people on the public housing waiting list. This is now a threshold requirement.

G1: More points are given to projects giving preference to lowest income tenants. Previous moderate/weak positive rating is now strong positive.

Idaho: (QAP 2022)	State Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Sponsors are expected to disperse units targeted for 30%, 35%, 40% and 45% area median income households throughout the development to the extent possible taking into consideration other programmatic requirements. Allocating such units so that one building(s) is/are 100% occupied by households at 30%, 35%, 40%, and 45% of area median income is not recommended. (p. 33)
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 6 points for developments with 40% or less area median income (AMI) units: <ul style="list-style-type: none"> • 1-60 total residential units where at least 2.5% of the rent-restricted units are at 40% or less AMI • 61 or more total residential units where at least 5% of the rent-restricted units are at 40% or less AMI ❖ 3 points for developments with 45% area median income (AMI) units: <ul style="list-style-type: none"> • 1-60 total residential units where at least 5% of the rent-restricted units are at 45% AMI • 61 or more total residential units where at least 10% of the rent-restricted units are at 45% AMI ❖ 2 points for developments with 50% area median income (AMI) units. <ul style="list-style-type: none"> • 1-60 total residential units where at least 10% of the rent-restricted units are at 50% AMI • 61 or more total residential units where at least 20% of the rent-restricted units are at 50% AMI (p. 32-33)

<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<ul style="list-style-type: none"> ❖ At minimum, the market study should include an overview of local economic conditions, including employment by sector, list of major employers, and labor force employment and unemployment trends over past 5-10 years. (p. 84)
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>See A4b— “Area of Opportunity” is defined by poverty rate below state average.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Max 5 points for developments located within the stated distances from goods, services, or major employer [see notes] (½ point per category): <ul style="list-style-type: none"> • <i>Goods and services</i> – located within 1.5 miles driving distance in urban communities or 3.0 miles driving distance in rural communities • <i>Major employer</i> – located within 5 miles driving distance in urban communities or 10 miles driving distance in rural communities (p. 20) ❖ 2 points for developments located in Areas of Opportunity. (Developments must be located in a census tract with a poverty rate that is equal to or less than the State of Idaho’s overall average of 11.2% to receive points in this category) (p. 25)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ ½ point for developments located in proximity to an Education Facility (includes K-12 schools, university, adult education, vocational school, community college) (1.5 miles for urban communities, 3 miles for rural) (p. 26).
<p>A6. Scoring that discourages development in distressed neighborhoods.²⁴</p>	<ul style="list-style-type: none"> ❖ Max 10 points for developments which receive non-related private party contributions, charitable cash donations, local government assistance, or federal government assistance through the FHLB AHP or CDBG programs in a cumulative amount within one of the following percent ranges of Total Development Cost <ul style="list-style-type: none"> • 2.00% to 3.99% -- 2 points

²⁴ 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.

	<ul style="list-style-type: none"> • 4.00% to 5.99% -- 4 points • 6.00% to 7.99% -- 6 points • 8.00% to 9.99% -- 8 points • Greater than 10.00% -- 10 points (p. 23-24) <p>[See A8] While rehabilitation is a positive for the preservation of affordable housing, it also encourages development in distressed neighborhoods</p> <ul style="list-style-type: none"> ❖ [Site Selection] The Association discourages development on sites located near facilities that process or store hazardous or explosive materials, or sites located in wetlands, floodplains, near airport runways, in high noise impacted areas, or in proximity to unprotected waterways. (p. 37) ❖ Up to a 30% increase in eligible basis will be considered for developments located in HUD designated "Difficult to Develop Areas" or "Qualified Census Tracts", if deemed necessary by the Association for the financial feasibility and viability of the proposed development. (p. 39)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ ½ point for developments located in proximity to a bus or transit stop (1.5 miles for urban communities, 3 miles for rural) (p. 26).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 1 point to rehabilitation developments that include the use of existing housing as part of a community revitalization plan. To receive points in this category, the proposed development must be located within a certified urban renewal district or other city-designated geographic area that specifically addresses affordable housing as a goal. (p. 25) ❖ 1 point for developments located within a QCT in which the development contributes to a concerted community revitalization plan (p. 33)

B1. Local participation in site selection is limited to statutory minimum. ²⁵	❖ (-) Up to 10 points for developments which received nonrelated local government assistance (p. 23).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Applications submitted for developments in locations where marketability is deemed questionable will fail the Market Study Threshold. (p. 9) ❖ A current (no more than 6 months old) Market Study is required which recommends and justifies the overall market area demand for the proposed rental units. Sponsors will be required to obtain their market study from a provider who is listed on the Association’s approved market study provider’s list. (QAP, p. 84)
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.	<ul style="list-style-type: none"> ❖ 1 point to development which give preference to 100% of the rent-restricted units to persons on Public Housing Authority waiting lists (p. 21) ❖ Most of the point categories require that a development must attach a copy of the proposed development’s Management Plan which includes a Tenant Selection Policy which evidence the development’s waitlist preferences and must include a requirement to use the “Coordinated Entry” system when filling vacancies in units set aside for PSH (p. 21, 30)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	❖ 2 points if 5%-9.99% of rent-restricted units are targeted to populations of individuals with children; 3 points if ≥ 10% of rent-restricted units are targeted to populations of individuals with

²⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>children. Such developments must provide appropriate amenities for children and families (i.e., open space, playground, laundry, etc.). (p. 23)</p>
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The maximum tax credit rents, less an allowance for tenant-paid utilities, must be less than the market rents for comparable units in the area where the development is to be located. If this test of affordability cannot be met, the housing sponsor would need to reconfigure the development with affordable rents and Area Median Income (AMI) targeting based on the next lowest established AMI category. (p. 12) ❖ [Preference Points] 15 points for developments that are obligated to provide low-income use 25 years beyond the initial 15-year compliance period. (p. 32)
REPORTING REQUIREMENTS	
<p>H1. Racial/demographic reporting requirements.</p>	<ul style="list-style-type: none"> ❖ [Compliance Monitoring] requires submission of demographic and economic information on tenants residing in LIHTC-financed properties (p. 52) ❖ The market study should include: <ul style="list-style-type: none"> • Demographic analysis of the number of households in the market area that are part of the target market (i.e., family, senior, etc.), income-eligible, and can afford to pay the rent, including a projected household base at placed in service date; • Geographic definition and analysis of the market area, including description of methodology used to define the market area and map of market area including proposed site; ☑ Analysis of household sizes and types in the market area, including households by tenure, income, and persons per household (p. 84)
OTHER CATEGORIES	

O1. Scoring that promotes units for persons with disabilities.	❖ 1 point to developments leasing rent restricted units who commit to giving a waitlist preference to households that contain one or more members with a handicap as defined in the Fair Housing Act (p. 22)
O2. Scoring that promotes units for special needs populations.	❖ 3 points to developments that provide housing for older persons as defined in the Fair Housing Act (p. 23) ❖ 3 points for Permanent Supportive Housing Units (p. 28)
O3. Scoring to promote home ownership.	❖ 1 point for developments with 100% of the units rent-restricted and intended for eventual tenant ownership after the 15-year compliance period has ended (p. 25)
O4. Provisions affirmatively furthering fair housing laws.	❖ The Association requires that all tax credit developments awarded tax credits under the QAP be located in a local jurisdiction that has adopted an “Affirmatively Fair Housing Resolution” and has implemented a fair housing action plan (p. 1)
Change since 2015?	A2; A4b; B1; F1/F2; H1; O1

2022: <https://www.idahohousing.com/documents/2022-final-qap-governor-approval-03-31-2022.pdf>

NOTES:

- Applications will be ranked under the point system with tax credit reservations being granted to those receiving the highest number of points.
- Developments will be disqualified if they do not meet the minimum scoring threshold, fail to provide evidence of readiness to proceed, management capacity and affordability for low-income households, or are deemed by the Association to be economically infeasible or located in a market area which does not have affordable renter demand for the proposed development.
- A4 Goods and Services:
 - Full service Grocery Store; Retail Shopping; Pharmacy; Post Office; Bank/Credit Union; Public Park; Education Facility/Schools; Public Library; Health Club or Recreation Center; Hospital or Medical Clinic, Medical or Dental Office; Social Services Center; Bus stop, transit stop; Public greenbelt bike/walking path access

OVERALL ASSESSMENT:

Changes:

- A2 – Scoring now discourages economic concentration with points allocated based on percentages of AMI in the development
- A4b – Point reduction from 9 points to 5 points

- B1 – Provision is no longer present in the QAP
- F1/F2 - Incentives are now specifically for families with children rather than large families
- H1 - Demographic information a required part of the market study – not mentioned in BOII report
- O1 – QAP now specifies handicap separate from special needs

TOTAL SCORE POSSIBLE:

- Applications for the competitive 9% LIHTC much achieve a minimum 70 points or the application will be declined
- Applications for non-competitive tax-exempt bond-financed 4% LIHTC developments must achieve a minimum 50 points or the application will be declined (p. 12)

ILLINOIS: (QAP 2022-2023)	Illinois Housing Development Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Projects located in Qualified Census Tracts (QCTs) or Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) that receive a Conditional Approval based on market characteristics but do not meet the stated conditions in their full Project Application will enter the scoring competition at a deficit of 3 points and, if awarded a Conditional Allocation of Tax Credits, will be required by the Authority to submit a Community Revitalization Strategy and supporting documentation that meets all requirements under the current Community Revitalization thresholds as a condition of closing (p. 16) ❖ A municipality/county which individually has less than 10% of its total housing stock deemed as affordable is subject to AHPAA (p. 49)
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ [Policy Priority] Racial Equity. The authority wants to prioritize projects that improve resident outcomes by expanding neighborhood assets and investments. (p. 4-5)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] Project applications will be competitively evaluated within the applicable geographic set-aside. The Authority may choose to allocate Tax

	<p>Credits under the Statewide Set-Aside to (1) Projects that fulfill certain housing policy priorities, with special attention given towards developments that further the Authority’s stated policy priorities in Section I.C (p. 12)</p> <ul style="list-style-type: none"> ❖ Applications are reviewed and evaluated according to established market factors outlined in the PPA Data and Metrics Chart (see notes) (p. 14) ❖ [Threshold Requirement] Applications for project sites in Chicago, Metro Chicago, or Other Metros must demonstrate that they are within at least one mile of a full-service grocery store or fruit & vegetable market/produce market. For non-metro areas, applications must demonstrate that the project is within 5 miles of a full-service grocery store or fruit & vegetable market/produce market. Convenience stores do not fulfill this requirement (p. 14) <p>[See A8]</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Projects located in an Opportunity Area can earn up to 10 points (p. 39) ❖ Projects located in a census tract meeting the criteria for Affordability Risk Index (see notes) Certification can earn up to 5 points (p. 40) ❖ A project application may score a maximum of 1 point per category in the following areas: Food Access, Health & Wellness, Education & Culture, Mobility, Civic & Culture Facilities, Retail, and Services. (p. 42)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ Schools are mentioned as an eligible neighborhood scoring asset. No mention of quality (p. 43)

<p>A6. Scoring that discourages development in distressed neighborhoods.²⁶</p>	<ul style="list-style-type: none"> ❖ Projects located in a QCT or Difficult to Develop Area are eligible for a basis boost (up to a thirty percent (30%) boost to the Eligible Basis of the Project) (p. 10) ❖ Assessment evaluation may consider development concerns located adjacent to QCTs (p. 13) ❖ Projects that are unable to obtain federal rental assistance contracts also may score points for deeper income and rent targeting achieved by other sources (p. 49)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ Projects with access to public transportation and/or alternative forms of transportation can receive up to 2 cumulative points: <ol style="list-style-type: none"> 1. All sites are located within a completed, in-process or programmed RTA TOD planning area or located within one half mile of a major transportation hub OR all sites are located with a quarter mile of a fixed route transit stop/serviced with DRT Monday – Friday 2. Scoring eligible sites are located within a proximate distance from a local job center (p. 41)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Selection Criteria] whether the project involves the use of existing housing as part of a concerted Revitalization Plan (p. 5) ❖ PPAs that cannot meet the Food Access thresholds will be conditional approvals as these projects will subsequently be required to provide additional documentation that there are community plans to develop a supermarket, supercenter, grocery store, produce market or farmers’ market in the defined radii, or that a Community Revitalization

²⁶ 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>plan exists that outlines strategies for improving area food access (p. 15)</p> <ul style="list-style-type: none"> ❖ Projects are eligible for up to 10 points in this category if they meet all of the thresholds referenced in the Community Revitalization Strategy Thresholds and Scoring Criteria (see notes) (p. 40)
B1. Local participation in site selection is limited to statutory minimum. ²⁷	<ul style="list-style-type: none"> ❖ Local support is not a requirement for project funding; however, the federal code (see [42(m)(1)(A)(ii)]) requires the Authority to notify local government executives of projects funded within their district, and to give them a reasonable opportunity to comment on the project. Sponsors may benefit by communicating project plans to local officials early in the process and addressing their feedback. Where possible, Sponsors should make an effort to be consistent with local plans (p. 20)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ Projects applying for 4% Tax Credits must submit an Affirmative Fair Housing Marketing Plan (p. 9) ❖ The Application must include a Site and Market Study completed according to the Authority’s Standards (p. 28) ❖ Property Managers must employ staff who possess Fair Housing and Affirmative Marketing certifications (p. 30)
C2. Scoring that incentivizes affirmative marketing.	<ul style="list-style-type: none"> ❖ Projects can earn up to 3 points for market characteristics. These characteristics can be evidenced through a superior market study. The market characteristics review will yield a score range of –3 to +3 (see notes) (p. 38)
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.	<ul style="list-style-type: none"> ❖ Projects may earn up to 8 points for either existing unit-based (rather than tenant-based) federal rental assistance or new commitments of unit-based federal rental assistance. To be eligible for

²⁷ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>points, the term of the rental assistance contract must have at least ten (10) years remaining, and new commitments must have a minimum term of 10 years. (p. 46-47)</p> <ul style="list-style-type: none"> ❖ Sponsors that are interested, capable, and willing to commit to participation in the Section 811 program may receive up to 2 points. Projects are only eligible if, at the time of Project Application, there are at least 3 people per unit on the Section 811 waitlist (p. 49)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ [Selection Criteria] Public housing waiting lists (p. 6)
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ Up to 2 points for projects that contain 3-bedroom and larger units (non-elderly units) (p. 35)
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ [Selection Criteria] tenant populations of individuals with children (p. 6)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Projects that are unable to obtain federal project-based rental assistance contracts may score up to 8 points for providing units with rents restricted to the 30% AMI limit and occupancy restricted to households with incomes at or below 30% of AMI (p. 47) ❖ [Tiebreaker Criteria] Projects that serve the lowest income households (p. 50)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ A project can earn an additional 3 points if it includes another 5% Type A accessible units (p. 35)

<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ [Policy Priority] IDHA continues its mission to finance housing development for populations with special needs (includes persons living with disabilities, experiencing homelessness, at risk of homelessness, and recently incarcerated populations) (p. 5) ❖ [Selection Criteria] Tenant populations with special housing needs (p. 6) ❖ Projects must exercise a waitlist preference for veterans on all units. A waitlist preference shall mean that if there is a veteran on the Project waitlist, the veteran’s application shall be considered before nonveteran applicants (p. 33) ❖ Projects may include additional Statewide Referral Network (statewide referral process that links Supportive Housing Populations with available Statewide Referral Network Units) Units for up to 10 points if, on the date Project Applications are due, there are at least 3 people per unity on the SRN waitlist (p. 49)
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ [Selection Criteria] projects intended for eventual tenant ownership (p. 6) ❖ [Tiebreaker Criteria] Projects that are intended for eventual tenant ownership (p. 50)
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ It is the policy of the Authority to administer the Tax Credit program affirmatively, establishing conditions in which individuals of similar income levels in the same housing market area have access to a comparable range of housing choices regardless of their race, color, religion, sex, disability, familial status or national origin. Each Sponsor shall pursue affirmative fair housing marketing policies when soliciting tenants and reaching out to underserved populations and those least likely to apply to reside in

	completed Tax Credit units. Sponsors are also expected to align with local AFFH plans. (p. 8)
	[See C1]
Change since 2015?	A1; A2; A3; A6; A8; C2; D1

2022-2023: https://www.ihda.org/wp-content/uploads/2021/09/QAP_2022-2023_Website.pdf

OVERALL ASSESSMENT:

TOTAL POINTS POSSIBLE: the maximum project score possible under the competitive scoring criteria is 100 points. It is possible to get negative points in certain categories.

- It is the Sponsor’s responsibility to understand and address all Conditional Approval conditions in the Project Application. Potential applicants with Conditional Approvals are encouraged to meet with Authority representatives to discuss the noted concerns before submitting a Project Application. Project Applications that do not adequately address the noted concerns will enter the scoring portion of the Project Application review at a deficit of three (3) points.

Notes:

- **Racial Equity** is a policy priority of the IDHA. This priority is focused on expanding racial equity among developers. The QAP notes that: Discrimination in the US housing market has contributed to both social and economic inequity manifest in the widening of the racial wealth gap and historic disinvestment in communities of color. The Authority’s approach to address racial equity is rooted in increasing opportunities for wealth-building for BIPOC entrepreneurs as well as creating opportunities for community-level wealth expansion. The Authority wants to prioritize projects that improve resident outcomes by expanding neighborhood assets and investments. QAP-related strategies supporting this focus area include:
 - Improving participation by Minority-owned Based Enterprise/Women-owned Based Enterprises (MBE/WBE) on LIHTC projects, especially BIPOC-led firms; and
 - Prioritizing project concepts that improve ‘quality of life’ and housing quality. (p. 4-5)
- PPA Data and Metrics Chart: <https://df7gosnywqs6g.cloudfront.net/wp-content/uploads/2019/10/PPA-Data-and-Metrics-Chart-UPDATE-for-2020-21.pdf>
- The Market Characteristics score may increase or decrease based on the following:
 - Tenant type and income targeting of the Project as a percentage of affordable housing in the PMA
 - Unit mix, unit size and proposed rent as compared to the existing market and to comparable properties are appropriate for targeted populations (s) and competitive within the market
 - Level of amenities (development and in-unit) as compared to the existing comparable properties
 - Marketability / visibility of the project and/or planned marketing techniques
 - Increase, decrease or stability of households, population, and employment (when appropriate) in the primary market area
 - Penetration rate, capture rate and demand

- [Community Revitalization Strategy](#)
- [Affordability Risk Index](#) -- a tool intended to demonstrate the need to preserve affordability in areas that are becoming less affordable at a faster rate. Census tracts where affordability loss risk is greatest receive the highest scores in this index. The ARI uses American Community Survey data to measure change over time across various factors that indicate affordability loss:
 - Median Household Income
 - Median Home Value
 - Families Below the Federal Poverty Level
 - Housing Unit Vacancy
 - Renter Tenancy
 - Individuals Employed in Management, Business, Science and Arts Occupations
 - Individuals with a Four-Year Degree (Bachelor's) or Higher.

CHANGES SINCE 2015:

- **Quality of Life Index:** The Authority has developed a new Quality of Life Index that calculates a score for every census tract in Illinois. The Quality of Life Index score is a dynamic measurement of cumulative positive outcome measurements in five different Quality of Life Categories. These categories are: education, prosperity, health, housing, and connectivity. Each category is worth two (2) points and consists of carefully vetted data. Census tracts can achieve overall scores ranging from one (1) to ten (10) points.
- Selection Criteria preferences certain provisions
- **A1** – QAP now mentions Racially or Ethnically Concentrated Areas of Poverty as an important condition for Project approval. Projects located in R/ECAPs must meet the requirements of the full project application and submit a community revitalization strategy.
- **A2** – Racial Equity is a stated policy priority
- **A3** – Access to public and community services is now a threshold requirement
- **A6** – Points no longer allocated to rehabilitation projects (??)
- **A8** – More points for community revitalization; community revitalization plan is no longer a tiebreaker
- **C2** – Points available for affirmative marketing characteristics
- **D1** – no longer a provision for PHA preference, but scoring reflects incentive for PHA involvement

STATE: INDIANA (QAP 2023-24)	Indiana Housing and Community Development Authority (IHCD)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	[Threshold] All projects that will impact existing tenants must provide a displacement/relocation plan detailing 1) any potential permanent, temporary or economic displacement/relocation issues, 2) the number of current tenants to be relocated, 3) where the tenants will be relocated during the rehabilitation and for the length of

	<p>time, 4) how displacement/relocation will be minimized and how relocation expenses will be paid for if they are incurred, 5) displacement/relocation assistance plan (e.g. Who will get assistance? How much assistance will they receive? When and how will they receive their assistance? Who will provide advisory services to those displaced?) and 6) anticipated relocation budget with itemized expenses (p. 30).</p>
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ First tie-breaker: Priority will be given to the development located in a community that has not received tax credits within the past three years (p. 51). ❖ [Also in A8] Up to 4 points if the development is a phase or component of a federal program that demonstrates: the program targets the de-concentration of poverty; the development is part of a mixed income or mixed-use community; the development provides for community improvements or amenities, such as new or improved public infrastructure, green space, improved transportation, or quality of life enhancements (p. 64).* ❖ Opportunity Index includes one point deduction for a project located in a census tract that is defined as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP) by HUD. See A4b (p. 71). ❖ 3 points if the project is in a Census Tract without any active RHTC developments of the same occupancy type (family, age-restricted, assisted living, or supportive housing). 1.5 points if in a Census Tract with exactly one other active RHTC project (p. 74). ❖ (-) Housing Need Index—1 point each for projects located within: city/town in which 42% or more of renter households are considered rent burdened (paying >30% of household income on housing); city/town in which 25% or more of renter

	households are considered to have at least one severe housing problem (incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, or cost burden greater than 50%); city/town in which 25% or more of renter households are at or below 30% of AMI (p. 75-76).
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	See notes on basis boost criteria below.
A4b. Scoring that encourages development in high opportunity areas.	<ul style="list-style-type: none"> ❖ Up to 12 points to projects in close proximity and accessible to desirable facilities: location efficient projects (projects that promote nearby (within ½ mile walking) access to healthy food options, community facilities, services, healthcare and retail centers (one service must be a grocery store)) =3 pts; TOD=2 pts [see A7]; opportunity index*=7 pts; undesirable site (¼ mile radius of sites that may pose a public or environmental health risk—junkyards, hazardous chemical factories, power plants/stations, water/sewage treatment facilities, etc.)=-1 pt (p. 68-71).
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ²⁸	<ul style="list-style-type: none"> ❖ (-) 10% set aside for Developments involving the substantial rehabilitation of existing federally assisted affordable housing and/or the demolition and decentralization of federally assisted affordable housing units utilizing the same site (over 50% of the units must be replaced) (p. 15). See also notes on basis boost criteria below. ❖ (-) Up to 6 points to projects that preserve existing affordable housing. A) Max (6) points awarded for projects that preserve an existing affordable housing Development assisted with Rental

²⁸ 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>Housing Tax Credits that will/have expire(d) in the current year or earlier or B) 6 points will be awarded for an application that proposes the preservation of a previously HUD funded or USDA funded affordable nonpublic housing Development or C) 4 points will be awarded for an application that proposes the preservation of any other affordable housing project (p. 60).</p> <ul style="list-style-type: none"> ❖ (-) Bonus point to a proposed development located in a QCT that is part of a concerted community revitalization plan (p. 63).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 2 desirable facilities points [see A4b] to TOD projects that are within half mile radius of a fixed transit infrastructure (light rail station, commuter rail station, ferry terminal, bus rapid transit station, streetcar stop, bus stop, major bus transit center) (p. 70).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ An IHEDA Housing Goal is to contribute to comprehensive neighborhood improvement (p. 9). ❖ 4 points to a project that demolishes buildings or redevelops on property that has been foreclosed, abandoned, or affected by a disaster (p. 61). ❖ Up to 4 points if there is a community revitalization plan that clearly targets the neighborhood in which the Development will be located. A community revitalization plan may include, but is not limited to, a comprehensive plan, downtown master plan, neighborhood plan, or economic development plan (p. 62). Two potential bonus points—see B1 and A6. ❖ Up to 4 points if development is a phase or component of: HUD’s Choice Neighborhoods program; New Market Tax Credit Development; IHEDA’s Blight Elimination Program (BEP) or the Indiana Office of Community & Rural Affairs

	<p>(OCRA) Blight Clearance Program (BCP); or other similar federal program** (p. 64).</p> <ul style="list-style-type: none"> ❖ 4 points to projects that include an investment of resources that will result in off-site infrastructure improvements or the development of parks, green space and shared amenities, recreational facilities and improvements within ¼ mile of the proposed project site that will serve the tenant base for the subject project. The proposed improvements, amenities, and/or facilities must be completed prior to the proposed placed in service date for the project (p. 65).
B1. Local participation in site selection is limited to statutory minimum. ²⁹	<ul style="list-style-type: none"> ❖ (-) Bonus point awarded to a development that is part of a community revitalization plan that has been adopted or certified by a local unit of government (p. 63). ❖ (-) Up to 4 points for projects receiving funding from other public or private sources, including state or local government funds (p. 72).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ All developments that receive a tax credit reservation are required to create an Affirmative Fair Housing Marketing Plan (AFHMP) (p. 49).
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentives language access and marketing to non-English speakers.	<ul style="list-style-type: none"> ❖ Projects can receive 0.5 point under “Resident Services” category for offering and funding ESL classes (p. 83).
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.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Up to 20 points to projects that exceed the 40-60 or 50-20 federal requirement.

²⁹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	Highest number of points awarded to projects that reserve a mid-range number of units to 50% AMI rents (and not to projects that reserve a high % of units to 30% AMI rents). This seems to contribute to IHCD's goal to have owner disperse all low-income units evenly among buildings and units (p. 52).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ 10% of available credits are set aside for Developments that commit to serving individuals with intellectual or developmental disabilities by providing affordable housing in an integrated setting (p. 13). ❖ Up to 5 points to projects achieving greater than minimum threshold requirements in 5% accessible units of total units in rehabilitation projects (6% in new construction projects) (p. 56).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 10% set aside for supportive housing for persons experiencing homelessness utilizing a Housing First model (p. 16-17). ❖ All Developments must commit to setting aside 10% of the total units for occupancy by tenants who meet the definition of "special needs populations"³⁰ (p. 48). ❖ 3 points if the project is integrated supportive housing for persons experiencing homelessness that was not designed through the Indiana Supportive Housing Institute, but which will be developed and operated by a team that previously completed the Institute (20-25% of the total development units are designated as supportive housing for persons experiencing homelessness). Not

³⁰ Pursuant to Indiana Code 5-20-1-4.5. Special needs populations include the following: persons with physical or developmental disabilities, persons with mental impairments, single parent HHs, victims of DV, abused children, persons with chemical addictions, homeless, elderly.

	eligible if project was developed through the Institute (those are eligible to compete under the Housing First set-aside) (p. 84).
O3. Scoring to promote home ownership.	❖ 2 points if projects will offer homeownership opportunities to qualified tenants after the initial 15-year Compliance Period (p. 76).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	A5; A8; B1; C1; D2; G1; O3

QAP (2023-2024): <https://www.in.gov/ihcda/files/2023-2024-QAP-Final.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 159

In addition to projects located in QCTs and DDAs that are subject to the federal 30% basis boost, projects competing under the Housing First set-aside [**O2**], Preservation set aside [**(-) A6**], or is eligible for points under the Integrated Supportive Housing scoring category.

* Opportunity Index. 1 point given to each characteristic: Project located in a census tract at the top quartile for median household income in the state and not within a QCT; Project located in a census tract at the bottom quartile for poverty rate in the state and not within a QCT; Project located in a county with an unemployment rate below the state average; Project located in a census tract with life expectancy above state average; Project located in a county with a ration of population to primary care physicians of 2,000:1 or lower; Project within 1 mile of post-secondary educational institution; Project within one mile of one of the 25 largest employers in the county. One point will be deducted if the project is located in a census tract that is defined as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP) by HUD. (p. 70-71).

**QAP explicitly states that Rental Assistance Demonstration (RAD), Promise Zone, HOME, Community Development Block Grants (CDBG), IEDC’s READI Program, and OCRA’s HELP Program do not qualify (p. 62).

CHANGES SINCE 2015:

A4b: More points awarded to projects in close proximity and accessible to desirable facilities.

A5: No longer awards points for proximity to public K-12 school with a rating of “A” or “exemplary” (Opportunity Index has removed this metric).

A8: Removed 10% set-aside for projects that are part of a designated Indiana Stellar Community (community revitalization pilot program). Also awards fewer points for having a community revitalization plan and off-site infrastructure improvement within ¼ mile.

B1: Points for local government funding and local government approval of a revitalization plan.

C1: All developments required to submit Affirmative Fair Housing Marketing Plan.

D2: No language referencing participation in the Affordable Housing Database.

G1: Awards more points to projects that exceed the 40-60 or 50-20 federal requirement, making it a strong positive provision rather than moderate/weak positive.

O3: Added provision awarding points for tenant homeownership opportunities.

IOWA: (QAP 2023)	Iowa Finance Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ IFA may reject any Application that fails to minimize permanent displacement of tenants and/or provide an adequate relocation plan. The Application must include a formal relocation plan if the Project scope requires any form of temporary or permanent relocation of existing tenants. The plan shall provide an overview of the need for relocation, a proposed timeline, an estimated budget, and other information as requested in the Application. If the project has a federal funding source, the most restrictive relocation plan requirements shall apply (p. 16) ❖ The Applicant shall make minimum set-aside election of income rent levels: <ul style="list-style-type: none"> • 20-50 Test. At a minimum, 20% or more of the residential Units in a Project are both rent-restricted and occupied by individuals whose income is 50% or less of AMI; or • 40-60 Test. At a minimum, 40% or more of the residential Units in a Project are both rent-restricted and occupied by individuals whose income is 60% or less of AMI; or • Average Income Test. At a minimum, 40% or more of the residential units in a project serve households earning as much as 80% AMI, as long as the average income/rent limit in the property is 60% or less of AMI (p. 16)

	<ul style="list-style-type: none"> ❖ [Tiebreaker] Third tiebreaker provision preferences projects in communities that have not received a reservation of housing tax credits for the longest period of time (p. 29)
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 0-2 points for Projects that are located in a census tract that has a low percentage of LIHTC Units Placed-In-Service compared to the total number of households (p. 22) ❖ 5 points if the Project is surrounded on at least 3 sides by a mixture of single-family, duplex, triplex residential properties; 3 points if surrounded on at least 3 sides by a mixture of single-family, duplex, triplex residential properties, and/or multifamily properties; surrounded by a mixture of both residential/multi-family and commercial properties. Commercial does not include manufacturing or industrial facilities (p. 24)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<ul style="list-style-type: none"> ❖ One of the goals of the QAP is to build rental units in communities and sites that have high opportunity for residents (p. 3).
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ 1 point for Projects located in an underserved city and have a low vacancy rate (p. 22) ❖ 1 point for Projects that are located in communities that have received IFA and IEDA housing and economic development awards in the past 2 years (p. 22) ❖ 0-2 points for Projects located in communities that have received IEDA High Quality Job Awards in the past 2 years (p. 22) ❖ 1 point for Projects located in an Iowa Opportunity Index Community (p. 22) ❖ Neighborhood location to services: <ul style="list-style-type: none"> • 5 points if the Project is located within 1 mile of at least 3 of the

	<p>following services: park, food bank or pantry, bank or credit union, police or fire station, convenience store or dollar store, pharmacy, or public library</p> <ul style="list-style-type: none"> • 3 points if the Project is located within 2 miles of at least 4 of the services • 1 point if the Project is located within 2 miles of at least 2 of the services (p. 23) <ul style="list-style-type: none"> ❖ 5 points if located within 1 mile of a grocery store; 3 points if located within 2 miles of a grocery store (p. 24) ❖ 5 points if located within 1 mile of a licensed daycare or senior center; 3 points if located within 2 miles of a licensed daycare or senior center (p. 24) ❖ [Tiebreaker] Project is within a project identified in an Iowa Great Places agreement that has been designated by the Iowa Great Places Board for participation in the program within the last 3 years (p. 29)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>No.</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.³¹</p>	<ul style="list-style-type: none"> ❖ IFA may reject sites (some examples, not all): <ul style="list-style-type: none"> • Located within ½ mile of storage areas for hazardous or noxious materials, sewage treatment plants or other solid waste facilities, businesses or equipment producing foul odors or excessive noise or the site is a prior storage area for hazardous or noxious materials, sewage, or other solid or liquid waste; • Located within one-half mile of a sanitary landfill or sites that were previously used as a sanitary landfill;

³¹ 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.

	<ul style="list-style-type: none"> • Located within a flood hazard area, or a 500-year flood zone • Located within 500 feet of an airport runway clear zone or accident potential zone; etc. (p. 14-15) <ul style="list-style-type: none"> ❖ IFA shall complete a subsidy layering review for each Project that received HUD assistance (other than HOME and CDBG) (p. 19)
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ 5 points if the Site is located ¼ mile from a bus stop for a fixed-route service or any city that does not have a fixed route service dial-a-ride is available M-F; 3 points if the Site is ½ mile from a bus stop or a fixed-route service (p. 24) ❖ 5 points if there is access to the site from local or collector road that has 2 lanes, a sidewalk, and speed limit not greater than 35 mph; 3 points if there is access to the site from local or collector road that has more than 2 lanes, no sidewalk, but speed limit not greater than 45 mph (p. 25)
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 3-5 points if the Project is in within a 1-mile radius of an area that has experienced significant new construction or renovation in the past 5 years OR the Project site is in a QCT where affordable housing is part of a Concerted Community Revitalization Plan (p. 23) ❖ 5 points if publicly paved road is already in place and appropriately sized; 3 points if publicly paved road is at the edge of the site but an extension or road widening is needed that is only a de minimus extension (p. 25)
B1. Local participation in site selection is limited to statutory minimum. ³²	(No Rating) The Applicant shall supply the contact information of the CEO of the Local Jurisdiction (p. 10).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ The Ownership Entity must submit the Affirmative Fair Housing Marketing Plan

³² Evidence of the inverse: preferences or requirements for local participation should also be noted.

	Package at least 120 days prior to the first Unit placing in service (p. 33)
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.	❖ 10 points for Projects (10% of the total Project Units) with project-based vouchers from a local PHA with a commitment for at least 10 years (p. 22)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	❖ The Ownership Entity must submit a commitment to notify the local public housing authority of all vacancies. at least 120 days prior to the first Unit placing in service (p. 33)
F1. Incentives for larger family units.	
F2. Incentives targeting families/families with children	❖ For family projects only, construction have an outdoor area provided for children to play in containing 5-7 commercial-grade play components (an element intended to generate specific opportunities for play, socialization, or learning) that does not include wood. At least 2 must be elevated. Swings, spring riders, water tables, playhouses, slides, and climbers are acceptable; ramps, transfer systems, steps, decks, and roofs are not. (p. 38)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ The following categories may be stacked or mixed to achieve points: <ul style="list-style-type: none"> • 5 points for Projects that provide Units that are set-aside and occupied by tenants with incomes at 30% AMI or less and are rent-restricted • 5 points for Projects that are set-aside and occupied by tenants with incomes at 40% AMI or less and are rent-restricted • 5 points for Projects that provide LIHTC rents for the 60% or 50% AMI units at 40% AMI levels (p. 21)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	

O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ 5 points for projects furthering Olmstead Goals and provide at least an additional 10% of the Units as fully accessible (p. 27) ❖ All projects shall have at least 10% of the Units accessible for persons with mobility disabilities. An additional 2% of the units must be accessible for persons with hearing or visual disabilities (p. 38)
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 5 points for Projects that provide Units for persons experiencing homelessness. These units shall be leased only to qualified persons experiencing homelessness (p. 21)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ [Tiebreaker] The second tiebreaker provision states that Projects that provide an opportunity for homeownership through Iowa Renter to Ownership Savings Equity (ROSE) Program (p. 29)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ The Applicant and any of its employees, agents, or sub-contractors doing business with IFA understand and agree that it is the responsibility of the Developer and Ownership Entity to adhere to and comply with all federal civil rights legislation, including the Fair Housing Laws ... (p. 35)
Change since 2015?	A1; A2; A4b; A6; A7; A8; B1; D1; F2; O1; O2; O3

2023 (DRAFT) QAP: <https://www.iowafinance.com/content/uploads/2022/09/2022-Draft-QAP-with-Amendment.pdf>

2023 4% QAP: <https://www.iowafinance.com/content/uploads/2023/01/2023-4-QAP.pdf>

2023 9% QAP: <https://www.iowafinance.com/content/uploads/2022/11/2023-9-QAP-FINAL.pdf>

CHANGES SINCE 2015

- A1:
 - Projects no longer given points for developing in areas that have not received LIHTC. Provision is now a tiebreaker
 - There is now a provision which requires set-asides for various income levels
- A2: Points now awarded for projects that place LIHTC projects in low-LIHTC areas and for projects that mix household types
- A4b: More points available in this category. Provisions now promote economic growth, opportunity, and location in underserved cities in addition to proximity to various services
- A6: There is no longer a preservation set-aside
- A7: Scoring now promotes proximity to bus routes and accessible roads

- A8: Scoring under this provision is now more specific about awarding points for community revitalization
- B1: Points no longer awarded for government contribution
- D1: Points now awarded for commitment to project-based vouchers
- F2: Family Projects now required to have an outdoor play area for children
- O1: Fewer points awarded for Olmstead Goals, but projects now required to have accessible units (mobility and visual/hearing impaired)
- O2: Fewer points awarded for serving special needs populations
- O3: Homeownership provision is no longer scored, it is now a tiebreaker provision

STATE: KANSAS (QAP 2023)	Kansas Housing Resources Corporation (KHRC)
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.	<ul style="list-style-type: none"> ❖ (-) First priority under selection criteria for rehabilitation properties are those requiring more rehabilitation work, based on KHRC review and/or the PNA (p. 18). ❖ (-) Third priority under selection criteria for rehabilitation properties are those with “a greater percentage of units with project-based rent assistance” (p. 18).
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.	<ul style="list-style-type: none"> ❖ 5 points may be awarded to proposals that KHRC staff rate as the most desirable sites. This is a factor that involves subjectivity regarding the ‘livability’ of a site. Staff will consider factors including, but not limited to, street appeal; the presence of desirable natural features such as parks, trees, or water; proximity to safe pedestrian travel routes (walkability); vehicle access and traffic patterns (including traffic noise); other transportation options; site slope or other challenges to buildability; areas for green space; opportunities for cultural, recreational, or social participation; safety (crime rates, proximity to emergency services, adequate street lighting, etc.); neighborhood stability (are people moving in or out, and whether

	<p>residents want to stay in the neighborhood or community); etc. (p. 22).</p> <ul style="list-style-type: none"> ❖ Up to 25 points for driving distance proximity to amenities. Maximum 10 points for lowest mileage to grocery, shopping, and pharmacy (Primary Amenities). One point each for each additional qualifying amenity within 3 miles (Metro) or within 3 and/or 15 miles (Rural), up to a maximum of 15 points (Secondary Amenities). These include: retail and restaurants; medical care; education and childcare; and community assets (p. 23-24). ❖ Up to 15 points to the application sited in census tract with the highest final percentile ranking and fewer points to the remaining applications based on their percentage of the highest final percentile ranking on “Opportunity Sites”* measurement (p. 27; Appx. D, p. 56). See notes.
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ 1 point each awarded under “Proximity to Amenities” [See A4b] for siting near elementary, middle, high school, and institution that is part of the technical or college system (p. 24).
<p>A6. Scoring that discourages development in distressed neighborhoods.³³</p>	<ul style="list-style-type: none"> ❖ KHRC may determine an application is ineligible due to the site being within ½ mile of: chemical or hazardous materials storage/disposal; commercial junk or salvage yards; industrial or agricultural activities generating odors or pollution; landfills currently in operation; wastewater treatment facilities; or other environmental conditions with potential impact on health and livability (p. 16). ❖ (-) Second priority under selection criteria for rehabilitation properties are those which the Kansas state USDA Rural Development office has identified as a priority site for rehabilitation (p. 18).

³³ 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.

	<ul style="list-style-type: none"> ❖ (-) 10 points awarded to applications sited within an area that is part of a Community Revitalization Plan that includes any portion of a QCT (p. 27).
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ “Desirable site” evaluation which can result in award of 5 points includes consideration of “other transportation options.” See A4b. ❖ 1 point awarded under “Proximity to Amenities” [See A4b] for bus stop within .25 miles at a fixed location served by a public transportation system six days a week (p. 24).
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 5 points to applications sited within an area that is part of a Community Revitalization Plan or Neighborhood Revitalization Plan (p. 27)
B1. Local participation in site selection is limited to statutory minimum. ³⁴	<ul style="list-style-type: none"> ❖ (-) Sixth priority under selection criteria for rehabilitation properties are “Properties identified by a local government as in need of rehabilitation for community revitalization purposes” (p. 18). ❖ (-) Up to 10 points may be awarded to projects that receive loans from established local government housing programs (p. 25).
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.	<ul style="list-style-type: none"> ❖ [Threshold Req] Ownership entity must inform the local PHA and HCV (Section 8) administrator(s) of the acceptance of their referrals (p. 15).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ 10 points to family property proposals with at least 25% of units containing 3+ bedrooms (p. 28). [Also F2]
F2. Incentives targeting families/families with children	See F1.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ 5 points to developments sited in the metropolitan region and committing to setting

³⁴ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>aside 15% of the units for households at 30% AMI (p. 28).</p> <ul style="list-style-type: none"> ❖ Up to 15 points if the development offers gross rent for all units up to the 60% limits at a rate that is below the fair market rent for the area in which the property is located as published by HUD (p. 29). ❖ Tiebreakers include projects that have the highest percentage of 30% AMI or less units (p. 29).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2.
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ KHRC may award LIHTCs to up to three applications outside the QAP criteria for “Unique Opportunities”. KHRC may consider proposals for supportive housing for populations with disabilities or specific populations with a particular vulnerability to housing instability (including but not limited to homeless or at risk of homelessness, victims of domestic violence, persons with mental illness or other disabling conditions, etc.) (p. 12). ❖ 5 points to proposals committing to at least 3 qualifying services for senior developments (p. 28).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ [Threshold] Developments proposing single family structures (no common walls), must include a detailed, comprehensive plan for converting the units to ownership by the tenants after 15 years (p. 18). ❖ 15 points if the application: proposes single family units (no common walls); qualifies for the nonprofit set-aside; and includes a detailed, comprehensive plan for converting the units to ownership by the tenants after 15 years (p. 29).
O4. Provisions affirmatively furthering fair housing laws.	No.
Change since 2015?	A2; A4a; A4b; A5; A6; A7; A8; B1; D1; O4

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QAP (2023): <https://kshousingcorp.org/wp-content/uploads/2022/10/2023-QAP-FINAL.pdf>

In addition to the Federal LIHTC, the QAP also governs the award of HOME Investment Partnerships funding (HOME) and National Housing Trust Fund (NHTF) to LIHTC properties (QAP, p. 1).

NOTES:

310 points must be earned for consideration for 9% LIHTC.

*Opportunity Sites: Each census tract receives a percentile ranking on each of four metrics, and a final percentile ranking. Each metric falls under one of four categories of importance:

- 1. Affordable Housing Need – The need for affordable housing options based on existing gaps relative to the household characteristics of the area. “Need” focuses on the lowest income level households, founded heavily on data points and findings from the 2021 Kansas Statewide Housing Needs Assessment.
- 2. Growth Demand – Potential population and employment growth in the area and the associated potential need for housing units. The metrics include population trends, building permit activity, and employment.
- 3. Quality of Life – The qualities of an area that make it favorable for lower-income households to live comfortably. Examples of quality of life metrics include housing quality, housing age, commuting time, and walkability.
- 4. Economic Opportunities – The economic prosperity and ability to thrive in the area. Economic opportunity metrics include income, market housing prices, rent, and other nonhousing costs.
- See QAP, Appendix D.

CHANGES SINCE 2015:

A2: Different priorities listed from previous QAP. Rehabilitation property selection criteria prioritizes properties which encourage economic concentration.

A4a: Site Inspection provisions from previously evaluated QAP are not present in 2023 QAP.

A4b: Site Inspection provisions from previously evaluated QAP are not present in 2023 QAP. Added points for desirable sites, proximity to amenities, and Opportunity Sites.

A5: Added a point for siting near schools.

A6: Changed priorities. Removed points for projects that preserve existing affordable housing that would be subject to foreclosure or default if tax credits were not available. KHRC can determine an application is ineligible due to proximity to incompatible uses.

A7: Added scoring that preferences siting near mass transit.

A8: Site Inspection provisions from previously evaluated QAP are not present in 2023 QAP. Changed priorities. Awards fewer points to projects that are part of a community revitalization plan.

B1: Changed priorities. Site Inspection provisions from previously evaluated QAP are not present in 2023 QAP. No longer requires resolution from local governing body approving the housing development. No

longer allows acceptance/rejection of application based on “non-point criteria,” which include: Jurisdictional comments of city, county, state or federal representatives, comments of neighborhood groups and organizations that are knowledgeable about the area.

D1: Points no longer awarded to projects that have entered into an agreement with the local PHA to accept the referral of tenants on the PHA waiting list.

O4: No general reference to nondiscrimination requirements of the Fair Housing Act and no reference to AFFH.

KENTUCKY: (QAP 2023-2024)	Kentucky Housing Corporation
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	<ul style="list-style-type: none"> ❖ KHC will aggregate remaining unallocated LIHTC and make awards prioritizing projects located in congressional districts that have not received an award
A2. Scoring that discourages racial and economic concentration.	<ul style="list-style-type: none"> ❖ 5 points DEDUCTED for projects located within 0.5 mile of an urban-designated KHC tax credit project and 3 miles of a rural-designated KHC tax credit project that <ol style="list-style-type: none"> 1) has been previously approved and is not yet placed in service (8609 has not been issued) as of the date shown on the list of projects AND 2) targets the same tenant populations as the applicant's project (Exhibit B, 4) ❖ 5 points for projects with developments in counties that have no income-restricted units (Exhibit B, 4) ❖ 5 points for projects located in counties that have not had a project awarded LIHTCs in the last 10 years (Exhibit B, 4)
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.	<ul style="list-style-type: none"> ❖ Projects will be awarded points for being located in close proximity to areas that score well on the Enterprise Opportunity 360 Report in the areas of Housing Stability, Education, and Economic Security. Points will be awarded based on the weighted scores below (multiplied by 5%) using the

	<p>Opportunity 360 scoring tool (Exhibit B, 4) (See Notes)</p> <ul style="list-style-type: none"> ❖ 5 points for projects located in a county where job creation is anticipated and has the largest impact on the per capita population (Exhibit B, 4)
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ Education is listed as a component of Opportunity360, but the methods of measuring school quality are not provided
A6. Scoring that discourages development in distressed neighborhoods. ³⁵	<ul style="list-style-type: none"> ❖ (-) Up to 10 points for projects that propose rehabilitation of rent-restricted properties most in need of rehabilitation. Points will be awarded based on the number of years since the date of the last substantial rehabilitation as evidenced by: a) the most recent restrictive covenant of record which restricts the use of the property to affordable rental housing, OR b) a letter from the provider of an existing project-based rental assistance contract (i.e., HUD or RD) stating when the last substantial rehab took place (Exhibit B) ❖ Up to 5 points for projects determine to be the most in need after inspection by KHC design and construction staff (Exhibit B, 3)
A7. Scoring or requirements that preference siting near mass transit.	No
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ Preference given to projects that are located in qualified census tracts and the development of which contributes to a concerted community revitalization development plan. ❖ (Urban Only) 1 point for projects located in a target area for which the local jurisdiction has formally recognized and/or adopted a plan for revitalization, community development, and/or economic development AND either of the following: <ul style="list-style-type: none"> 1) the plan was created or updated within the past 10 years OR 2) the plan is more than 10 years old and the Project provides a letter from

³⁵ 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.

	an elected official indicating that the plan is still valid and demonstrating the progress made to achieve the goals of the plan (Exhibit B, 4)
B1. Local participation in site selection is limited to statutory minimum. ³⁶	(-) See A8
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.	<ul style="list-style-type: none"> ❖ [Selection Criteria] Public housing waiting lists ❖ 1 point for if the applicant has provided a written commitment to notify local public housing authorities of project vacancies and to give priority to households on the PHA's waiting list, if there are no eligible households on the project's waiting list (Exhibit B, 2)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No
F1. Incentives for larger family units.	No
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ [Selection Criteria] Tenant populations with children
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Preference given to projects that serve the lowest-income tenants ❖ Points will be awarded based on the percentage of households that fall in an income range that is at or below 60% AMI compared to the number of households in the county (Exhibit B, 4) ❖ [Tiebreaker provision #2] Project is located in a county with the highest percentage of cost-burdened tenants (Exhibit B, 4)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	

³⁶ Evidence of the inverse: preferences or requirements for local participation should also be noted.

O1. Scoring that promotes units for persons with disabilities.	No
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ [Selection Criteria] Tenant populations with special housing needs ❖ [Compliance Monitoring] The established programs of the projects serving special needs will be monitored on an ongoing basis to determine accordance with the original proposal. Homeless special needs groups will be expected to document program outcomes and results
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ [Selection Criteria] Projects intended for tenant ownership ❖ Projects proposing tenant ownership at the end of the 15-year compliance period will receive 0.5 points. Detached single-family homes are prohibited (Exhibit B, 4)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ KHC administers a variety of federal programs and is required to affirmatively further the purposes and policies of the Fair Housing Act, which not only prohibits discrimination but directs KHC to take steps to proactively overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities for all. KHC may determine an application for LIHTC would have one or more disparate impacts in violation of federal law.
Change since 2015?	A2; A4b; A8; B1; D1; F2; G1; O2; O3; O4

QAP 2023-2024: <https://www.kyhousing.org/Partners/Developers/Multifamily/Documents/2023-2024%20Qualified%20Allocation%20Plan.pdf>

NOTES

- QAP does not have page numbers
- [Opportunity360](#), is a comprehensive approach to understanding and addressing community challenges by identifying pathways to greater opportunities using cross-sector data, community engagement and measurement tools. The platform provides a comprehensive view into a neighborhood and facilitates a strategic, asset-building approach to community development.

Index	Opportunity 360 Score	Weight	Score
Housing Stability		0.40	40
Education		0.20	0
Economic Security		0.40	0

2.0000

TOTAL POINTS POSSIBLE: 32-33. An application must earn a minimum of 60 percent of the possible points to be eligible. Ties in scoring will be resolved based upon the pool-specific tiebreaker criteria. Additionally, points may be deducted from applications where past performance issues were identified by KHC on the capacity scorecard or KHC determined that an item was omitted from the application submission.

CHANGES SINCE 2015:

- **A2:**
 - Points now deducted for projects that result in economic concentration (rural)
 - Fewer points awarded for projects that develop new units in counties without KHC-supported developments (10 points to 5 points)
- **A4b:** QAP now includes provisions that promote development in high opportunity areas, including areas with positive job creation)
- **A8:** No longer a set-aside provision for the Louisville HOPE VI provision or a Community Impact Pool
- **B1:** A bit hidden, but for Urban Areas, there is a part of the provision that implies local support is needed
- **D1:** Points reduced from 5 points to 1 point
- **F2:** Serving tenant populations with children is a selection criterion for KHC
- **G1:** PKHC now gives preference to projects that serve the lowest-income tenants and awards points based on the percentage of low-income tenants served
- **O2:** Selection Criteria and Compliance Monitoring now specify that project programs will be monitored on their ability to serve tenants with special needs / special housing needs
- **O3:** QAP now includes a provision giving points to projects proposing tenant ownership at the end of the compliance period
- **O4:** QAP now specifies that they are required to affirmative further fair housing laws.

STATE: LOUISIANA (QAP 2022-2023)	Louisiana Housing Corporation (LHC)
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.	<ul style="list-style-type: none"> ❖ Second tiebreaker is being located in a census tract with high area median incomes (p. 10). Also applies to A4a. ❖ Project Diversity—Percentage of low income units at or below 60% AMI in project does not exceed: 80% of the total project units (3 pts); 70% of the total project units (4 pts); 60% of the total project units (5 pts) (Appx. A, p. 39). ❖ (-) 1 point each if project is located in a parish where: the percentage of renters experiencing

	cost burden exceeds 53%; the percentage of persons who are children under 5 in poverty exceeds 32%; the percentage of persons in poverty exceeds 20%; Median HH Income is at or below \$46,000 (Appx. A, p. 40).
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	<ul style="list-style-type: none"> ❖ Geographic Diversity—Project is located in a census tract in which the median household income exceeds: 100% of the AMI for the MSA (3 pts); 110% of the AMI for the MSA (4 pts); 120% and above of the AMI for the MSA (5 pts) (Appx. A, p. 39). ❖ See also A2.
A4b. Scoring that encourages development in high opportunity areas.	<ul style="list-style-type: none"> ❖ (Under Neighborhood Features) 1 point each if within 1 mile (5 miles for Rural Projects) and 0.5 points if within 1-2 miles of: grocery store, fresh produce market/fruit stand, hospital/doctor office or clinic, bank/credit union, elementary/secondary/post-secondary school, university/vocational/technical & community college, pharmacy/drug store, public transportation, licensed adult/child day care/after school care, public park, police/fire station. Max 5 points allowed (Appx. A, p. 41).
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ [Threshold] (Under Infrastructure requirements) Evidence that (a) primary educational facilities are reasonably available to school-age children of tenants if the project is for family units or, if such facilities are not, a narrative statement of how school-age children will access public educational facilities and (b) the local public school system has been notified about the estimated prospective population count of school age children in the project when the project is placed in service (p. 14). ❖ (Under Neighborhood Features) 1 point if within 1 mile of elementary, secondary, or post-secondary school (5 miles if Rural Project). 0.5 point if within 1-2 miles (Appx. A, p. 41).
A6. Scoring that discourages development in distressed neighborhoods. ³⁷	<ul style="list-style-type: none"> ❖ [Threshold] (Under Negative Neighborhood Features) Projects must not be within ½ of

³⁷ 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>incompatible uses (exception: towns with pop. 15,000 or less). Incompatible uses are: junkyard/dump, salvage yard, distribution facility, high voltage substations, prison, pig/chicken farm, processing plant, heavy industrial, airport, solid waste disposal (p. 14).</p> <ul style="list-style-type: none"> ❖ (-) 3 points to projects that meet any of the redevelopment criteria: distressed property, redevelopment property, owner occupied property with development plan of action (Appx. A, p. 39). ❖ (-) 7 points for rehab of: Existing LIHTC; existing USDA or other federally funded project; existing non-historic residential building; blighted housing remediation and/or replacement; rehab infill/scattered site; or preservation of residential historic property (Appx. A, p. 39). ❖ (-) 1 point if project is an existing federally funded project with HAP contracts, or USDA/RD with PBRA ((Appx. A, p. 39). ❖ (-) 1 point if project is located in a DDA (Appx. A, p. 40). ❖ (-) 3 points if project is located in Choice Neighborhood Grant (CNA) designated area (Appx. A, p. 40).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ [Threshold] (Under Infrastructure requirements) Evidence that reasonable transportation services are currently proximate to the site, or if such transportation services are not, a narrative statement of how tenants will access commercial, educational, recreational and other services upon completion of project (p. 14). ❖ (Under Neighborhood Features) 1 point if within 1 mile of public transportation (5 miles if Rural Project). 0.5 point if within 1-2 miles. (Appx. A, p. 41).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 3 points for new construction project included in a Concerted Community Revitalization Plan (Appx. A, p. 39).

B1. Local participation in site selection is limited to statutory minimum. ³⁸	No.
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold] Owners must market to and rent to low-income households referred by the LHA/OCD, and/or the local PHA if the tenants satisfy the requirements of the Project's Management and/or Operating Plan (p. 14). [Also applies to D1].
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.	<ul style="list-style-type: none"> ❖ [Threshold] Projects must set aside 5% of units for HH's with incomes at or below 30% AMI and give preference to Veterans, Disabled, and Elderly persons on the PHA waiting list if they satisfy requirements of management/operating plan (p. 13). ❖ See C1.
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ Owner must certify annually that an extended low-income housing commitment was in effect, including the requirement that an owner cannot refuse to lease a unit in the project to an applicant because the applicant holds a voucher or certificate of eligibility under Section 8 of the United States Housing Act of 1937 (p. 77).
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ (Under Project Amenities) 1 each if project includes playground, basketball court, tennis court. Max 3 points (Appx. A, p. 41).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ First tiebreaker is percentage of low-income units (p. 10). ❖ [Threshold] Projects must set aside 5% of units for HH's with incomes at or below 30% AMI (p. 13). ❖ Up to 4 points for Extremely Low-Income Targeting: at least 5% but less than 10% of units serve HH's (other than Permanent Supportive Housing) with incomes at or below 30% AMI (4 pts); At least 5% and less than 10% of units serve

³⁸ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>PSH HH's with incomes at or below 20% AMI (3 pts) (Appx. A, p. 40).</p> <ul style="list-style-type: none"> ❖ Up to 5 points for Very Low-Income Targeting: 20% of units (other than PSH) between 31-50% AMI (3 pts); 25% of units (other than PSH) between 31-50% AMI (4 pts); 35% of units (other than PSH) between 31-50% AMI (5 pts) (Appx. A, p. 40).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ [Threshold Req.] All applicants that have units without rental assistance must indicate a commitment to accept Section 811 project based rental assistance or other LHC sponsored rental assistance for up to 10% of the total restricted units for the purpose of providing integrated housing opportunities to persons with disabilities (p. 13). ❖ See O2. ❖ Points awarded for additional accessible units above minimum requirements. 2 points if 15-20% of total units, 3 points if >20% of the total units (Appx. A, p. 42).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Up to 6 points for projects that serve special needs households (homeless, disabled, single parent, veterans). 10% of units= 4 pts; 20% of units= 5 pts; 30% of units= 6 pts (Appx. A, p. 39-40). ❖ 6 points if 100% of the project units are designated for elderly households (Appx. A, p. 40).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 1 point for new construction homeownership project. Owner must agree to sell units at minimum purchase price by not later than the 16th year of the compliance period (Appx. A, p. 39).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Appendix G—Fair Housing Principles and Requirements states, “It is the goal of the LHC to ensure that new and ongoing programs and policies are designed to Affirmatively Further Fair Housing, promote equity and equality, and

	provide the utmost opportunity for choice.” This section lists 9 guiding principles consistent with this goal. LHC also reserves the right to deny applications for projects determined to have a discriminatory impact in violation of the FHA and reserves the right to waive any provision/requirement of the QAP in order to Affirmatively Further Fair Housing (Appx. G, p. 92).
Change since 2015?	A2; A4a; A4b; A6; C1; D1; F2; O2; O3; O4

QAP (2022-23): <https://www.lhc.la.gov/hubfs/2022-2023%20QAP%20Final%20as%20of%2007-14-21.pdf>

NOTES:

CONCERTED COMMUNITY REVITALIZATION PLAN: a plan that involved public input and that has been adopted by the local governmental unit. The plan must target a specific area but does not encompass the entire city, town, or village and provides a clear direction for implementation, includes a strategy for obtaining commitments of public and private investment in non-housing infrastructure, amenities, or services beyond the credit development. The plan demonstrates the need for revitalization and includes the planning document elements such as setting goals for outcomes, identifying barriers to implementation, establishing timelines and benchmarks, and identifying community partners. The proposed site must be located within the target area (p. 29).

CHANGES SINCE 2015:

A2: QAP awards points for Project Diversity (positive) and awards points for siting in a parish with high poverty rates (negative).

A4a: Strong positive ranking reduced to moderate/weak positive due to decrease in points awarded for projects located in census tracts in which the median income of the census tract exceeds 100-120% of the AMI for the Parish.

A4b: Strong positive ranking reduced to moderate/weak positive due to decrease in points awarded for proximity to positive neighborhood features.

A6: Siting away from incompatible uses is now a threshold requirement instead of awarding points.

C1: QAP now requires marketing to low-income households referred by the LHA/OCD, and/or the local PHA.

D1: Points awarded for accepting referrals from PHA waiting lists is now a threshold requirement.

D2: Added monitoring requirement for owners to certify that no applicants were denied because they hold a voucher.

F2: Small point award for projects with a playground, basketball court, or tennis court was not present in previously evaluated QAP.

O2: 11 points are no longer awarded for Veterans' projects.

O3: Added a point award for new construction homeownership project.

O4: This QAP added a strong statements and list of principles supporting Fair Housing and AFFH.

MAINE: (QAP 2023-2024)	State Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ [Threshold] Projects that involve the acquisition and rehabilitation of existing multifamily housing must comply with MaineHousing's <i>Temporary Relocation and Permanent Displacement Policies</i> and if the Project is federally-assisted, all applicable federal requirements, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (p. 7)
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>❖ [Threshold] An area(s) of recreational activity must be located on the Project site or within a ½ mile. The area(s) and activities must be free of charge to the tenants and not require membership. Projects with single-family detached style units satisfy this requirement if each unit has a private lawn with sufficient rom for playground equipment, gardening, or other activities acceptable to MaineHousing. The requirements of this subsection do not apply to existing multifamily housing projects if the Applicant cannot comply with the requirements because of the nature of the site, structural limitations, zoning restrictions or other land use limitations. (p. 10)</p> <p>❖ Up to 15 points for Smart Growth:</p> <ul style="list-style-type: none"> • 5 points if the Project is located with a Safe Walking Distance (½ mile or less) of a designated pick-

	<p>up location for existing Fixed-route Public Transportation</p> <ul style="list-style-type: none"> • 5 points if Demand Response Transportation is available to all tenants with no eligibility criteria that would limit or deny service • 5 points if the Project is located within not more than ½ mile of at least 3 Activities Important to Daily Living (p. 16) <ul style="list-style-type: none"> ❖ Up to 10 points for projects located in Service Center Communities that fulfill a particular housing need (p. 15-16) ❖ 10 points for projects located on Native American Tribal Lands (p. 16)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>No.</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.³⁹</p>	<p>(-) See G1</p> <ul style="list-style-type: none"> ❖ (-) Projects that involve the acquisition and rehabilitation of Affordable Housing must include the addition of at least 20 new units, or meet the requirements of the Preservation Set-Aside in § 3.B (p. 2) ❖ Demolition of existing housing that has not been condemned or declared blight by a municipality is not eligible unless approved by MaineHousing (p. 3) ❖ 4 points for project sites that exhibit one or more of the following: <ol style="list-style-type: none"> 1. Replacement or rehabilitation of existing rental housing containing 5 or more units without permanently displacing any existing tenants or increasing their housing costs (including rent and all other charges paid by the tenant) by more than 10%; 2. Rehabilitation, remediation, or reuse of an existing building or

³⁹ 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>structure that has a current use other than multifamily rental housing;</p> <ol style="list-style-type: none"> 3. One or more buildings or structures used for purposes other than single family residential housing or agriculture purposes, have been or will be demolished or removed for purposes of redeveloping the site; 4. Left vacant or nearly vacant in the development of a downtown or other city or town center, such as vacant lots or parking lots abutting commercial buildings and/or multifamily rental housing; or 5. Specifically designated by a municipality for redevelopment to renew a blighted area or remediate environmental risks to the occupants. Vacant lots in single-family residential areas are not eligible for points under this subsection. Undeveloped portions of existing sites are not eligible for points unless the existing project on the site previously satisfied one of the above criteria. (p. 11-12) <p>❖ MaineHousing will also take into consideration any federal limitations when combining the Credit with other federal assistance (i.e. “subsidy layering” guidelines) (p. 19)</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>See A4b (Smart Growth)</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<p>❖ 2 points if the Project is located within the boundaries of and contributes to the revitalization goals and efforts identified in a Community Revitalization Plan 1 extra point if the Project also involves the preservation of existing Affordable Housing or is located in a QCT and at least 20% of the units are market rate (p. 16)</p>

B1. Local participation in site selection is limited to statutory minimum. ⁴⁰	❖ Upon receipt of an application, MaineHousing will notify the CEO of the municipality with jurisdiction over the location of the proposed Project. The notice will provide for a 15-day comment period. MaineHousing will consider any comments received (p. 4)
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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ [Threshold] The Applicant must give an occupancy preference to eligible persons whose names are on a public housing or Section 8 waiting list, except for Projects: (i) financed by Rural Development, or (ii) with Section 8 Project-Based Rental Assistance (preference will apply to any Credit Unit without project-based rental assistance) (p. 11). ❖ Owner must certify annually that in the prior 12-month period, the owner has not denied tenancy to any applicant or terminated the tenancy of any tenant solely because the applicant or tenant had a Section 8 voucher or certificate (p. 51).
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ Up to 6 points if the project is for families and a minimum percentage of the Credit Units are 2 and 3+ bedroom units as follows: <ul style="list-style-type: none"> • 6 points if at least 50% of the Credit Units are 2+ bedroom units and at least 20% of the Credit Units are 3+ bedroom units • 3 points if at least 70% of the Credit Units are 2+ (p. 12-13)
F2. Incentives targeting families/families with children	No

⁴⁰ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] MaineHousing will set aside up to \$300,000 of the annual State ceiling for the preservation and rehabilitation of one existing multifamily rental housing project if the scope of rehabilitation meets the minimum requirements set forth in § 5.D.2 and 2. at least 25% of its units will be converted to Section 8 under HUD’s Rental Assistance Demonstration (RAD) Program, Section 18 Demolition/Disposition Program or other HUD conversion programs (p. 2) ❖ [Threshold] The Project will comply with Section 42 of the Code and this QAP for a minimum period of 45 years to maintain the Project as residential rental housing, keep at least 60% of the total Credit Units in a Project occupied by persons with 50% area median income and keep the Credit Units in the Project rent-restricted in accordance with Section 42 of the Code (p. 6) ❖ 1 point if the applicant agrees to accept and use any funding from MaineHousing’s NHTF program for the project. Any funding award will require a certain number of units in the project to be affordable to and occupied by Extremely Low Income households (p. 12)
REPORTING REQUIREMENTS	
<p>H1. Racial/demographic reporting requirements.</p>	<ul style="list-style-type: none"> ❖ Each Owner must submit certain information and data about the tenants in Credit Units for the prior calendar year, including household income; monthly rental payments; family composition; use of Section 8 rental assistance and other similar assistance; the race, ethnicity, age, and disability status of the members of the housing; and all other occupancy information required to MaineHousing by March 1st of each year throughout the Extended Use Period (p. 25)
OTHER CATEGORIES	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<ul style="list-style-type: none"> ❖ [Threshold] For Family Housing, the Applicant agrees to accept HUD Section

	811 Project Rental Assistance (PRA) and comply with the program requirements, if made available by MaineHousing (p. 7)
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 6 points if the Project provides a set-aside for at least 20%, but not less than 4 of the units, for Persons Experiencing Homelessness or persons who have disabilities, are victims of domestic violence, or have other special housing needs, to create permanent supportive housing for person who require that level of intervention within the special needs populations. (p. 12) ❖ 1 points for each unit that: <ol style="list-style-type: none"> 1. Exceeds the minimum number of such units as required by applicable federal and state accessibility laws, and 2. Meets the requirements for a type A unit under ANSI Standard A117.1-2009 <p>Max points available:</p> <ul style="list-style-type: none"> • 12 points for Projects providing Housing for Older Adults • 6 points for Other Projects (p. 13)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ [Tiebreaker] In the event of a tie, the Application with the most acceptable plan to convert the Project to affordable homeownership for the residents after the Extended Use Period will have priority (p. 18)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Owners must comply with the Federal Fair Housing Act and all other federal, state, and local fair housing and accessibility requirements, and the regulations, guidance, and standards associated with the foregoing (p. 23)
Change since 2015?	A1; A4a; A4b; A7; B1; D2; F1; G1; O1; O2; O3

Maine QAP (2023-2024): https://www.mainehousing.org/docs/default-source/qap/2023-2024-qap.pdf?sfvrsn=71818415_2

TOTAL POINTS POSSIBLE: 94

NOTES:

- “Activities Important to Daily Living” means activities or destinations that are important to the course of daily living of the population served by the Project, which include a grocery store, a public school only if the Project is housing for families, a daycare only if the Project is housing for families, a senior center only if the Project is Housing for Older Adults, a pharmacy, a bank or credit union, a post office, a retail store, a general health care practitioner’s office, a public library, a location where people socialize, a hospital and other activities or destinations approved by MaineHousing. Convenience stores and gas stations are not eligible destinations for purposes of this subsection. If there is more than one activity or destination important to the course of daily living within a single establishment, each activity or destination will be counted separately (e.g. a retail store that also includes a pharmacy and a bank branch will be treated as 3 destinations important to the course of daily living).

CHANGES SINCE 2015

- **A1:** QAP no longer specifies a priority for economically diverse communities
- **A4a:** QAP no longer allocated points for projects located in areas with average market rents higher than the average maximum tax credit rent for housing occupied by tenants with income at or below 60% AMI or for projects located in tracts with AMIs higher than the municipality’s AMI
- **A4b:**
 - More points allocated for projects in Service Center Communities
 - More points allocated for Smart Growth
 - Points now allocated for projects located on tribal lands (can be positive or negative)
- **A7:** Public transportation is fully encapsulated by Smart Growth
- **B1:** Not a strong provision, but the QAP states that the CEO of the municipality might have some say in the Project
- **D2:** It is now a threshold requirement for applications to give preference to people on the Section 8 waiting lists.
- **F1:** More points allocated to larger units intended for families
- **G1:**
 - Providing low-income housing is no longer a priority, but is included in the QAP as a set-aside and a threshold requirement
 - Points no longer given for new project-based rental assistance projects
- **O1:** Complying with PRA is now a threshold requirement
- **O2:** No longer a priority, but more points are given for projects providing supportive housing
- **O3:** Points no longer given, but this provision is now a tiebreaker requirement

STATE: Massachusetts (QAP 2022-23)	MA Dept. 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	❖ In order to avoid undue concentration of resources in any one area, DHCD will consider tax credit projects of 100 units or more on a case-by-case basis. DHCD will require a detailed market study and will closely examine the probable absorption rate for these projects. (p. 56)

<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 14 points available for development in an “area of opportunity.” To be eligible to receive points within this category, a family housing project typically must be located in a census tract with a poverty rate below 15%. See A4b (p. 42) ❖ DHCD will award 6 points to an application that includes at least 50% market rental units. 3 points will be awarded to a project with at least 25% market rental units (p. 49).
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<ul style="list-style-type: none"> ❖ Priority category 4 mandates family housing production in opportunity neighborhoods (p. 8). ❖ As part of threshold evaluation, sustainable development principle: 6) Expand housing opportunities (p. 10). ❖ 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 expanding social and/or educational opportunities, expanding employment opportunities and/or significant revitalization and investment activity (p. 11). ❖ 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. 32)
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ Relates somewhat to development in areas of opportunity (see A4b).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 14 (cumulative) points for developments located in areas of opportunity. 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. 49-50).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ A large portion of opportunity points comprised of scoring on the strength of the public school system a project is located in. Points based on the percentage of 10th grade students that score in the Advanced or

	<p>Proficient categories using an average of the 3 MCAS tests (English Language Arts, Math, and Science/Technology Engineering): $\geq 90\%$ = 8 points, $\geq 85\%$ = 6 points, $\geq 80\%$ = 4 points, $\geq 75\%$ = 2 points (p. 50).</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁴¹</p>	<ul style="list-style-type: none"> ❖ (-) Priority category 2 encourages “investment in distressed and at-risk neighborhoods where strategic housing investment has a strong likelihood of catalyzing private investment, improving housing quality, promoting occupancy for a range of household incomes, and supporting a broader concerted plan for community revitalization through investment in jobs, transportation, and education” (p. 7) ❖ “The quality of the site is one of the most fundamental aspects of any housing project... However, in reality, many tax credit applications represent existing, occupied residential properties located on sites that are acceptable, but not ideal. Additional applications represent abandoned or distressed properties that previously were occupied by tenants or homeowners. The sites of these properties also may be less than ideal. The Department anticipates that some 2022-2023 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 the U.S. Dept. of HUD. Since an entire class of applications includes sites that have been accepted by the federal housing agency, DHCD has elected not to evaluate “site” as a competitive category in 2022-2023. However, every 2022-2023 application submitted for consideration still must include a site acceptable, by Department standards, for the proposed housing use.” (p. 32) [See also A3] ❖ Subsidy layering reviews may be performed by DHCD (certification in Sept. 2017) (p. 65)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ Threshold sustainable development principle 7: Provide Transportation Choice (p. 10).

⁴¹ 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.

	<ul style="list-style-type: none"> ❖ Within Area of Opportunity scoring-- up to 4 points available in this category to projects located within .5 miles of a major public transit station, permitting ready access to employment opportunities (p. 51). ❖ Up to 6 points available for projects that meet the criteria in the Transit Oriented Development Program (TOD) passed by the MA legislature in Jan. 2021. DHCD anticipates making TOD funding awards of \$1 million to \$1.5 million per project. Eligible projects typically must be located within .5 miles of an existing or planned transit node. Projects also may be eligible if they are located between .5 and 1 mile of an eligible transit node and have other compelling TOD features, such as parking ratios of less than one space per unit or proximate secondary transit connections such as a public or private bus line (p. 54).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ DHCD will prioritize proposals in which housing development is demonstrably part of a larger, concerted community revitalization plan to expand access to jobs, education, transportation, and other amenities to enhance residents’ access to opportunity. (p. 7) ❖ As part of threshold evaluation, sustainable development principles: 1) Concentrate development and mix uses and 2) Advance equity (p. 9). ❖ DHCD encourages projects that are part of comprehensive neighborhood revitalization improvement plans, including projects in the federal Choice Neighborhoods pipeline (p. 11). ❖ Up to 6 points for developments that are included in a comprehensive neighborhood revitalization effort (p. 47). ❖ 3 points to projects located in a QCT in which the development contributes to a concerted community revitalization plan (p. 51).
<p>B1. Local participation in site selection is limited to statutory minimum.⁴²</p>	<ul style="list-style-type: none"> ❖ DHCD is committed to working with municipal government to address local zoning obstacles faced by project sponsors as they attempt to produce

⁴² Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>critically needed affordable rental units (p. 7). [Good provision]</p> <ul style="list-style-type: none"> ❖ (-) DHCD will award up to two points to any application with a letter of support from the chief elected official of the community to benefit from the tax credit project. (p. 47) ❖ DHCD encourages applications from tax credit projects that have full local support (p. 32). ❖ [Threshold Req. #3] Applicants must either show evidence of local support OR include in the written narrative substantial efforts to respond to local concerns and obtain the chief elected official's support. DHCD may reject the application if it is not satisfied with efforts to obtain support (p. 32-33). Lack of local support is not ground for disqualification. ❖ During 2022, DHCD will carry out a study on the potential discriminatory effects of local preference (p. 64). ❖ 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 NonGovernmental Entity” (p.64).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ [Threshold Req. #13] Each sponsor must provide a narrative describing how the project location and type, tenant selection plan, and other applicable policies and procedures will further the Department’s Fair Housing Principles. The narrative also should clearly describe the efforts that will be made to ensure affirmative fair housing marketing and outreach to those households and individuals least likely to apply for the affordable units within a project (p. 36-7).

	<ul style="list-style-type: none"> ❖ 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. 45). ❖ DHCD requires developers to establish affirmative fair housing marketing goals for occupancy of each project, taking into account the demographics of the region in which the housing is located. Developers must establish effective marketing plans to reach the identified minority groups that are least likely to apply for the housing being provided, including an affirmative fair housing marketing plan for all units and 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. 63).
C2. Scoring that incentivizes affirmative marketing.	<ul style="list-style-type: none"> ❖ DHCD requires a detailed marketing plan for all projects. The plan must indicate in detail how the sponsor intends to market to and attract underserved populations to the project, indicating persons with disabilities and minority households. 20 points available and 12 required minimum for marketability (p. 45).
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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ 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 (Appx. E).
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ 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. 8).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Priority category 1 is housing for persons with income <30% AMI (p. 7). ❖ DHCD encourages projects that include units for individuals or households with incomes below 30% of area median income, including homeless families and individuals (p. 11).

	<ul style="list-style-type: none"> ❖ [Threshold Req. #11] All projects must reserve 13% of units for extremely low-income persons (<30% AMI) (p. 36). ❖ 3 points to projects that commit to renting ≥15% of all units to HHs with incomes ≤30% of AMI (p. 51).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<ul style="list-style-type: none"> ❖ All project owners are required to report HH characteristic data for all tax credit units at the time of final rent-up and on an annual basis from that point forward, including tenant income level and race (p. 66).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ DCHD places a special emphasis on increased visitability and housing opportunities for people with disabilities (p. 6, 11). ❖ Sponsors must meet mandatory DHCD requirements that are intended to maximize visitability beyond code requirements (p. 43). ❖ 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. 49). ❖ Up to 6 points to projects with enhanced accessibility features (p. 53).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Priority category 1 places a particular emphasis on persons who are homeless or at-risk of homelessness (p. 7). ❖ 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. 49).
O3. Scoring to promote home ownership.	No.
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Threshold Req. #13] 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. 36-7).

	<ul style="list-style-type: none"> ❖ DHCD’s objective is to ensure that new and ongoing programs and policies affirmatively advance fair housing, promote equity, and maximize choice. (65-6) ❖ Fair Housing Principles and Affirmative Fair Housing Marketing Plan Guidelines in Appendix D.
Change since 2015?	C2

QAP (22-23): <https://www.mass.gov/service-details/qualified-allocation-plan>

OVERALL ASSESSMENT:

TOTAL POINTS POSSIBLE: 182. Every tax credit application must score at least 12 points in each of the five components of “Fundamental Project Characteristics (Financial Feasibility, Design, Development Team, Marketability, and Readiness to Proceed). If an application scores fewer than 12 points in any of the five categories, it will not receive an allocation of tax credits during 2022-2023. Nor will the application be evaluated for “Special Project Characteristics”. If an application scores at least 12 points in each of the five categories, totaling at least 60 points, it will be evaluated and scored in the second competitive category, “Special Project Characteristics”.

Set-asides: Production (70%), Preservation (30%)

CHANGES SINCE 2015:

C2: DHCD requires a marketing plan that details how the sponsor intends to market to and attract underserved populations to the project, indicating persons with disabilities and minority households. Now a strong positive ranking from no scoring that incentivizes affirmative marketing in previously evaluated QAP.

MARYLAND: (QAP 2022)	Department of Housing and Community Development
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	❖ [Threshold] All projects involving any new construction must be located in a Priority Funding Area (PFA) (see notes) (GUIDE, p. 37)
A4a. Scoring that encourages development in high-income areas.	No
A4b. Scoring that encourages development in high opportunity areas.	❖ Communities of Opportunity. 16 points will be awarded to family projects with reasonable access to jobs, quality

schools, and other economic and social benefits, as demonstrated by meeting at least 1 of the following 2 criteria:

1. Be located in a Community of Opportunity (see notes)
2. Be located in a geographic area defined by applicable law as a community of opportunity for affordable family housing or identified as such by an order or consent decree entered by a federal or State court of competent jurisdiction or by a settlement agreement to which DHCD or a local government in Maryland is a party

Projects that receive points in this category may not also receive points under Community Impact and Defined Planning Areas and Opportunity Zones (GUIDE, p. 59-61)

- ❖ Defined Planning Areas and Opportunity Zones. 12 points for projects in a rural area or projects located in any of the following: Certified Heritage Areas within county designated growth areas; Sustainable Communities; Empowerment Zones; Federal or Maryland Enterprise Zones; Main Street/Maple Street Maryland communities; or rural villages designated in county comprehensive plans as of July 1, 1998 and where there is evidence of other recent public investment in the plan area. An additional 4 points if the area is located in a designated Opportunity Zone. Projects that receive points in this category may not also receive points under Community Impact and Communities of Opportunity (GUIDE, p. 62)
- ❖ 2 points will be awarded to the top 2 projects in communities of opportunity in the Baltimore Region and in the DC Metro areas (GUIDE, p. 71)

	<ul style="list-style-type: none"> ❖ [Bonus Points Available] Project responds to substantial economic development opportunities that have the opportunity to create new jobs in the State (GUIDE, 84)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ [See A4b] Educational Opportunity is a component of Communities of Opportunity. This indicator is measured by multiple variables, one of which includes Maryland School Assessment (MSA) scores, proficient and advanced, for elementary, middle, and high school students obtained from MD Department of Education. These scores play a key role in determining educational advancement as well as opportunities available to students. The MSA scores are positively correlated with educational opportunity (GUIDE, p. 60)
<p>A6. Scoring that discourages development in distressed neighborhoods.⁴³</p>	<ul style="list-style-type: none"> ❖ All family projects located within Communities of Opportunity that request competitive tax credits qualify for the State 30% Basis Boost without prior (Community Development Administration) CDA approval (QAP, p. 9) ❖ Projects receiving a Basis Boost because of location in a QCT or DDA are not also eligible to receive the State Basis Boost (QAP, p. 9) ❖ HUD is required to undertake subsidy layering reviews of each project receiving HUD housing assistance to ensure that sponsors do not receive excessive government subsidies by combining HUD housing assistance with other forms of federal, State, or local assistance. This subsidy layering review is delegated to CDA (QAP, p. 22) ❖ (-) 5 points will be awarded to “Choice Neighborhood” projects (GUIDE, p. 71)

⁴³ 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.

	<ul style="list-style-type: none"> ❖ Points for local contribution is calculated based on the overall percentage of leveraged funds with projects with a higher level of leveraged funds receiving the greatest points (GUIDE, p. 74)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ DHCD will award up to 8 points to TOD projects as follows: <ul style="list-style-type: none"> • 8 points to a project that is part of a MDOT-designated TOD; • 8 points to a project that is located within a ½ mile radius of a passenger boarding and alighting location of a planned or existing transit rail stop or station; • 8 points to a project that is located within a ½ mile radius of two separate bus lines, where passengers can transfer from one line to another; • 8 points to a project located in an area defined as rural by DHCD or USDA and located within a 1 mile radius of a passenger boarding and alighting location of a planned or existing bus or transit rail stop or station • 8 points to a project that is family housing in a Community of Opportunity and either a) is located within a 2 mile radius of a passenger boarding and alighting location of a planned or existing bus or transit rail stop or station; or b) augments the minimum threshold tenant services by providing (or arranging for the provision of) alternate forms of free or subsidized transportation services and assistance for residents of the project beginning no later than 8:00 am and ending no earlier than 6:00 pm, Monday through Friday • 4 points to a project served by Demand Responsive Transit (DRT) that is accessible (i.e.

	<p>available to all people with disabilities including those who use a mobility device and/or service animal)</p> <ul style="list-style-type: none"> • 4 points to a project offering car sharing. The project is located within ¼ mile of a car sharing vehicle (i.e. “Zip Car” or other car sharing services), or is proposing a car sharing service on site; or • Points will be allocated to a project located in a transit-proximate development that promotes walkability and/or bike-friendly land use with easy access to mass transit and retail store locations based on its WALK Score (see notes) (GUIDE, p. 62-63)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<p>❖ Community Impact Projects. 16 points will be awarded to any elderly or family project, new construction, or rehabilitation, in a QCT or DDA that contributes to a concerted community revitalization plan (see notes). Projects that receive points in this category may not also receive points under Communities of Opportunity and Defined Planning Areas and Opportunity Zones (GUIDE, 58)</p>
<p>B1. Local participation in site selection is limited to statutory minimum.⁴⁴</p>	<p>❖ (-) Upon receipt of an application submission package for LIHTC, DHCD will provide written notice of the application and a reasonable opportunity to comment to the political subdivision in which the project is located. If a political subdivision provides comments, DHCD will consider the comments in its review of the application (GUIDE, p. 8)</p>
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<p>❖ [Threshold] All applications must include a certification that the project will develop and implement an Affirmative Fair Housing Marketing Plan (AFHMP)</p>

⁴⁴ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	(see notes for minimum requirements) (GUIDE, p. 22)
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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ [Threshold] All projects must establish a priority for households on waiting lists for public housing or other federal or State assisted low-income housing. The applicant must also demonstrate that the entity maintaining the waiting list is willing to refer tenants to the project (GUIDE, p. 22) ❖ Owner must certify annually that an extended low-income housing commitment was in effect, including the requirement that an owner cannot refuse to lease a unit in the project to an applicant because the applicant holds a voucher or certificate of eligibility under Section 8 of the United States Housing Act of 1937 (p. 17).
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ Up to 8 points are available in the Family Housing category for projects appropriate to the needs of families with children (see notes). To qualify for additional points, a project cannot age-restrict its units and will receive points based on the provision of units suitable to larger households (GUIDE, p. 69)
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ [Threshold] Family projects must deliver or coordinate services that improve building and unit maintenance, stabilize occupancy by improving resident’s abilities to uphold their lease obligations, and enhance quality of life and self-sufficiency for residents including children (GUIDE, p. 24)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ The project owner must certify annually that, if a low-income unit in the project became vacant during the year, reasonable attempts were or are being made to rent that unit or the next

	<p>available unit of comparable or smaller size to tenants having a qualifying income before any units in the project were or will be rented to tenants not having a qualifying income (QAP, p. 17)</p> <ul style="list-style-type: none"> ❖ [Threshold] At a minimum, applicants must agree that low-income units in the project will be rented to households with incomes at rents that do not exceed the levels required under the proposed funding source(s) (GUIDE, p. 20) ❖ A project will receive 5 points if at least 10% of the income-restricted units in the project will be income-restricted at 30% of the area median gross income or below for the compliance period (GUIDE, 64) ❖ Up to 10 points will be awarded to any project, regardless of location, based on the weighted average of area median gross income targeted by bedroom in a project (GUIDE, 64) ❖ To receive points for project-based rental assistance, the assistance must be structured to ensure that tenants in project-based units pay no more than 30% of their income toward rent and utilities (GUIDE, p. 75)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<ul style="list-style-type: none"> ❖ Project owner must provide to CDA annually the following information about the tenants of each project that receives LIHTC: race, ethnicity, family composition, age, income, use of rental assistance, disability status, and monthly rental payments (p. 16).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<p>See O2</p> <ul style="list-style-type: none"> ❖ All projects, regardless of the source of funds, must ensure that persons with physical disabilities have priority for occupancy of any units qualified under

	<p>the Uniform Federal Accessibility Standards (UFAS). To ensure that persons with disabilities who require the features of a UFAS unit receive priority for UFAS qualified housing, when a UFAS unit becomes available, it must be offered first to a prospective tenant whose disabilities require such a unit even if other applicants who do not require accessible units have higher placement on the general waiting list (GUIDE, p. 24-25)</p>
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ [Threshold] Projects that include populations with disabilities or special needs must ensure that the targeted population served is able to benefit and access the services provided to the general population at the property (GUIDE, p. 24) ❖ Projects that intend to serve persons experiencing homelessness or formerly homeless individuals or families must demonstrate that services will be provided in cooperation with the local Continuum of Care (CoC) and that client data will be entered into the Homeless Management Information System (HMIS) or its successor; and Projects must develop and/or use an up-to-date community scan (within the last five years) that includes a review and assessment of existing local amenities, services, community assets, potential partners, and resources (GUIDE, p. 24) ❖ DHCD will award points for projects that set aside up to 20% of the affordable units in a project for targeted populations (PWDs; persons with special needs, persons experiencing homelessness, youth aging out of foster care, survivors of crimes, veterans, persons transitioning from a correctional facility or other state facility or institution, persons recovering from substance abuse disorder) (GUIDE, p. 67)

	<ul style="list-style-type: none"> ❖ [Bonus Point] Projects that promote the development of projects that promote intergenerational housing opportunities or housing for persons experiencing homelessness (GUIDE, p. 84)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ Properties intended for eventual homeownership must be physically designed to facilitate marketing for and conversion to homeownership (GUIDE, p. 21)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ The project owner must certify annually that all units in the project were for use by the general public, including the requirement that no finding of discrimination under the Fair Housing Act occurred for the project (QAP, p. 17) ❖ [Bonus Points] Project affirmatively furthers fair housing or contributes to a concerted fair housing strategy (GUIDE, p. 71)
Change since 2015?	N/A but need narrative on why no 2015

QAP 2022: <https://dhcd.maryland.gov/HousingDevelopment/Documents/rhf/2022QAP.pdf>

PROGRAM GUIDE (QAP Appendix A) 2022:

<https://dhcd.maryland.gov/HousingDevelopment/Documents/rhf/2022MRFP-Guide.pdf>

NOTES

- All AFHMPs must include, at a minimum, the following provisions:
 - Prohibit income requirements for prospective tenants with Housing Choice Vouchers or similar vouchers, including, but not limited to, VASH, Shelter Plus Care, Bridge Subsidy and Continuum of Care;
 - Eliminate local residency preferences;
 - Ensure access to leasing offices for persons with disabilities;
 - Provide flexible application and office hours to permit working families and individuals to apply;
 - Encourage credit references and testing that take into account the needs of persons with disabilities or special needs;
 - Provide notice of unit availability and accept referrals from public housing authorities, voucher administrators, and mobility counseling programs operating in the regional market area, and formalize such arrangements in the form of contracts or Memorandums of Understanding;
 - An agreement to certify to DHCD annually that the owner accepts vouchers and does not employ practices that have the effect of excluding voucher holders, such as screening standards that require incomes at two or three times the monthly contract rents; and

- Develop marketing strategies to identify applicants that are least likely to apply
- PFAs are existing communities and places designated by local governments indicating where they want state investment to support future growth. This includes areas already designated as enterprise zones, neighborhood revitalization areas, heritage areas, and existing industrial land <https://planning.maryland.gov/pages/ourproducts/pfamap.aspx>
- To meet the definition of a concerted community revitalization plan and qualify for points in this category, a concerted community revitalization plan must meet the following requirements:
 - a) Officially adopted or endorsed by a local government or created with local government involvement;
 - b) Established to increase investment in the community or build from existing community assets;
 - c) Developed and approved in accordance with local planning requirements;
 - d) Includes evidence of community and stakeholder engagement;
 - e) Has a defined geographic boundary, that includes the proposed site or is focused within a single municipality, jurisdiction, or targeted area;
 - f) If there is a housing component in the plan, the plan should include rehabilitation or new construction of rental housing as a goal for the community;
 - g) Includes details of implementation measures along with specific time frames for the achievement of such policies and housing activities; and
 - h) Provides a list of other investment occurring or planned within the immediate area.
- (<http://www.dhcd.state.md.us/GIS/multifamily/index.html>) The Communities of Opportunity designated on the Maryland QAP Comprehensive Opportunity Maps are based on a “Composite Opportunity Index” developed by DHCD
 - The Composite Opportunity Index uses publicly-available data and is based on three major factors: community health, economic opportunity, and educational opportunity.
 - Community Health: The community health indicator represents the wealth and quality of life in a community relative to the State average.
 - Economic Opportunity: Economic opportunity measures the extent to which a community provides employment opportunity and mobility to its residents.
 - Educational Opportunity: Educational opportunity measures the outcomes of student performance and educational attainment in the community.

- WALK Score point allocation:

WALK Score Range	Points Allocated
50-59	2
60-69	4
70-79	6
80+	8

- FAMILY HOUSING

Points Awarded	Project Must Meet Requirements in Both Columns Below and Must Not Impose Any Age Restrictions on Tenants	
	Minimum % of Units in Project with 2 BRs, 3 BRs or more	Minimum % of Units in Project with 3 BR or more
2	65%	5-9%
3	60%	10%-19%
4	60%	20% - 24%
5	65%	20% - 24%
6	60%	25% - 29%
7	65%	25% – 29%
8	60%	30% or more

TOTAL POINTS POSSIBLE: 200. The scoring criteria are designed to ensure that awards are made to project proposals that have strong sponsors, serve critical housing needs for low-income households and persons with disabilities or special needs, contribute positively to their communities, leverage non-state resources, and achieve balance between costs and development quality, sustainability, and durability. Scoring Criteria is such that points can be deducted.

CHANGES SINCE 2015:

Maryland’s QAP was not evaluated as part of the Building Opportunity II report.

STATE: MICHIGAN (QAP 2022)	Michigan State Housing Development Authority (MSHDA)
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.	<ul style="list-style-type: none"> ❖ (-) Projects will be eligible for 5 points for obtaining a new project-based tenant subsidy contract (other than MSHDA PBV) (p. 18 Score Summary). [Also a moderate positive provision in G1]. ❖ (-) Projects that can demonstrate that they are located within an area that has a high percentage of households that are overburdened will receive up to 3 points (p. 8 Score Summary). [Negative provision to the extent that a large share of cost burdened renters encourages racial and economic concentration]
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.	<ul style="list-style-type: none"> ❖ Second tiebreaker is the highest sum total score under Section A. Opportunity Criteria of the Scoring Criteria (p. 11 QAP). ❖ Up to 20 points to projects located in areas containing amenities that are in close proximity to the project site (1 mile for Urban areas and 2 miles for Balance of State areas). Eligible amenities include: grocery/supermarket, pharmacy, general medicine physician/clinic, public library, public school, community organization, bank/credit union, employment center, public park, job training center, and food pantry (p. 3 Score Summary).
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ Proximity to Amenities section includes public school. See A4b.
A6. Scoring that discourages development in distressed neighborhoods. ⁴⁵	<p>(-) Up to 20% Basis Boost available to projects located in a QCT or DDA (p. 28 QAP).</p> <ul style="list-style-type: none"> ❖ (-) See statutory set-aside (Notes) for development in <u>eligible distressed areas</u> which do not necessarily need to be areas that also include a community revitalization plan (p. 8 QAP). ❖ (-) Preservation set-aside eligible developments include projects with government financing from HUD or MSHDA and must be at-risk of losing their low-income restrictions/subsidies or in need of repair (p. 23 QAP). [Subsidy layering with old, at-risk subsidized housing which comprises 25% of set-aside for all tax credits.] ❖ (-) 5 points to projects that preserve existing project-based tenant subsidies for the length of the existing rental subsidy compliance period and commit to renew the contract to the extent available (p. 18 Score Summary). ❖ (-) 5 points to projects that are utilizing a program that promotes the conversion and

⁴⁵ 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>preservation of public housing units (p. 19 Score Summary).</p> <ul style="list-style-type: none"> ❖ (-) Up to 4 points to projects based on the number of homeless persons in the county in which the project will be located: 500-1249 (1 pt.); 1250-1999 (2 pts.); 2000-3500 (3 pts.); 3500+ (4 pts) (p. 30 Score Summary).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ Up to 3 points for projects located within ¼ of a mile from a public transportation stop (i.e. bus stop) or that have a dial-a-ride (curb to curb) transportation service in the community that runs at least 5 days per week. Projects may be considered for 3 points if it provides a form of transportation to the project that is comparable to or exceeding the service levels (e.g. accessibility, capacity, reliability, practicality, etc...) and scope of a typical fixed route public transportation system (p. 2 Score Summary).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ See Strategic Investment set-aside category (10% of all credits) in Notes section which includes a strong emphasis on developments that support broader community revitalization (p. 25 QAP). ❖ 2 points to projects where a Community Revitalization Plan is in place and where a sponsor can demonstrate that the proposed development contributes to the plan. Must include a letter of support from the local government referencing their awareness and support of the project as it contributes to the betterment of the community in which it is or will be located (p. 6-7 Score Summary). [See Notes for CCRP definition.]
<p>B1. Local participation in site selection is limited to statutory minimum.⁴⁶</p>	<ul style="list-style-type: none"> ❖ (-) Up to 3 points to projects that submit evidence of local support in the form of tax abatement. These points are also available to existing projects for which tax abatement has previously been in place and the local governing body has agreed to provide tax abatement going forward. MSHDA will consider awarding these points for alternative tax incentive structures such as Tax Increment Financing (or other structures) that meet the intent of reducing the property tax burden (p. 17 Score Summary).

⁴⁶ Evidence of the inverse: preferences or requirements for local participation should also be noted.

HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ [Threshold] Applicants must submit an Affirmative Fair Housing Marketing Plan consistent with MSHDA requirements (p. 21 QAP). See <u>Tab P of MSHDA's Combined Application</u> for requirements.
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 in high-opportunity areas.	❖ [Threshold] Applicants must submit a written statement stating that 1) the development will give priority to persons whose names are on appropriate Public Housing or Housing Choice Voucher waiting lists maintained by a PHA in the area in which the project is located, and 2) it will make ongoing efforts to request that the PHA make referrals to the project, or place the relevant project information on any listing the PHA makes available to persons on their waiting lists (p. 21 QAP).
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ Projects receive 3 points for providing accessible community space for use by tenants, including individuals with children. The accessible community space is envisioned as one room or contiguous space that may be used for activities such as dining, crafts, exercise, medical clinic, socializing, birthday parties, holiday gatherings, study areas and/or other activities for individuals with children (p. 16 Score Summary). ❖ 1 point under Specific On-Site Services for: Child Care or Head Start type program, youth programming, or other evidence-based youth development initiatives (p. 31 Score Summary).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	Up to a 20% basis boost made available to projects that restrict 25% of the total units to tenants with 30% AMI or less (deep income targeting). Projects that qualify for the 20% basis boost and agree to restrict all rent levels on units without project-based vouchers to 5% below the stated maximum for the length of the affordability

	<p>period will be eligible for an additional 10% basis boost (deep income targeting) (p. 28 QAP).</p> <ul style="list-style-type: none"> ❖ MSHDA will continue to make project-based vouchers available on a case-by-case basis to projects that agree to set-aside at least five units for Permanent Supportive Housing (p. 14 QAP). ❖ Up to 20 points to projects that commit to restricting units to low-income tenants (based on both depth and breadth of targeting). Points encourage use of PBRA. The lower rent targeting must be evenly distributed among bedroom types (p. 10 Score Summary). <p>See A2.</p>
REPORTING REQUIREMENTS	
<p>H1. Racial/demographic reporting requirements.</p>	<ul style="list-style-type: none"> ❖ MSHDA is committed to adding data collection and analysis, which may include but is not limited to a racial equity impact assessment, to the ongoing QAP and LIHTC review processes, with the intent of using that data to make future changes to the QAP, Scoring Criteria, and other program documents to best grow equity within the state (p. 16 QAP).
OTHER CATEGORIES	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<ul style="list-style-type: none"> ❖ Projects that incorporate “visitability” design features into all units with first floor living space or access to units by elevator receive 3 points (p. 15 Score Summary). ❖ 3 points to projects that commit to building 10% of the units within the development according to barrier free or fully adaptable to barrier free standards (p. 15 Score Summary).
<p>O2. Scoring that promotes units for special needs populations.</p>	<p>Up to a 20% basis boost made available to PSH projects (p. 28 QAP).</p> <ul style="list-style-type: none"> ❖ Up to 5 points for projects proposing an Affordable Assisted Living (AAL) structure (development for seniors, with services) (p. 9 Score Summary). ❖ PSH Developments: Developments that dedicate a minimum of 25% of the total project units to serve HH's who meet the Category 1 Homeless

	<p>definition and have a disability and/or HH's who meet the Category 4 Homeless definition and have a disability receive 4 points (Option 1). Developments that dedicate at least 25% of the total project units to serving the most vulnerable populations with their PSH units: Projects that dedicate at least 25% (8 points) or at least 50% (12 points) of the total project units to HH's that meet the Category 1 or 4 Homeless definition AND meet the chronically Homeless definition and/or are referred from the Data Match list and/or are in the top 10% of the local Continuum of Care's prioritized list scoring HH's (Option 2)(p. 29 Score Summary).</p> <ul style="list-style-type: none"> ❖ Up to 4 points for projects that are proposing to create Recovery Housing (responds to the needs of Substance Use Disorder populations) (p. 32 Score Summary).
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ One point to projects that agree to offer 100% of the housing tax credit units for sale to tenants in such units at the end of the initial 15-year compliance period. Owner must provide a detailed tenant ownership plan that describes the terms of the right of first refusal given to the tenants, including the means of exercising the right of first refusal, the determination of the sale price for each unit and any continuing use or deed restrictions that will be imposed on the units by the seller following any such transfer (p. 13 Score Summary).
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ MSHDA shall administer the QAP and the allocation of LIHTC in a manner consistent with both federal housing policy governing non-discrimination and MSHDA's statutory non-discrimination requirements (p. 1 QAP). ❖ Up to 4 points for developments furthering Fair Housing by adopting screening criteria that is not more restrictive than the MSHDA Housing Choice Voucher criteria, with the exception of specific violent property crimes (p. 32 Score Summary).
<p>Change since 2015?</p>	<p>A4b; A5; A8; B1; F1; F2; H1; O2</p>

QAP (22-23): https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/lihtc/assets/liqap/mshda_li_qap_2022_2023_qap_final.pdf?rev=db31cac47b7d458ca72bf1783912f5d9&hash=9BD84DFDED17EA8BE7F844791036B737

Scoring Criteria located in the Score Summary (22-23): https://www.michigan.gov/mshda/-/media/Project/Websites/mshda/developers/lihtc/assets/liqap/mshda_li_qap_2022_2023_score_summary.pdf?rev=bdf76275dc4f48109cf64407544a2eaa&hash=98D31FB5E7FE79B3E30F33191A8DB1B7

Notes:

TOTAL POINTS POSSIBLE: 185 (Scoring systems is such that points can be gained and lost.)

Set aside categories include: preservation (13%), permanent supportive housing (PSH) (25%)⁴⁷, open (urban) (28%)⁴⁸, open (balance of state) (13%)⁴⁹, strategic investment (10%)⁵⁰, undesignated (12%).

- Statutory set-asides (nonprofit – 10%, rural housing – 10%, elderly – 10%, eligible distressed areas – 30%, tribal housing – the lesser of one project or \$1.5 million) to be spread across all other set-aside categories.

A Community Revitalization Plan is defined as follows: A published document (approved and adopted by the local governing body by ordinance or resolution) that assesses the existing physical structures and infrastructure of the community and that targets specific geographic areas for residential developments. The plan should also contain detailed policy goals that include the redevelopment and production of affordable housing as well as the proposed timeline for achieving these goals. Additionally, the plan should explain municipal support to the particular area. The following items should be included to demonstrate that the project is part of the Community Revitalization Plan: Letter from local government which includes a description of the Community Revitalization Plan; includes a link to plan; outlines the goals of the plan; defines the specific boundaries of the target area; describes how the proposed project compliments the plan goals; certifies the amount of significant public and private investment in the area that has or is occurring proximate to the project (p. 6-7 Score Summary).

CHANGES SINCE 2015:

⁴⁷ To qualify, developments must set aside at least the greater of 10 units (Balance of State) or 15 units (Urban) or 35% of the units in the development for new tenants that are PSH-eligible.

⁴⁸ For projects that do not meet the preservation or PSH category requirements.

⁴⁹ Id.

⁵⁰ Projects funded under this Strategic Investment Category will not be subject to the standard Scoring Criteria and will be evaluated based on different criteria/threshold requirements. There may be extraordinary circumstances where the evaluation of an application by the standard review process outlined in the QAP does not necessarily take into consideration the contribution that a development would make to the state's overall economic and community development strategy. These situations may include, but are not limited to, applications that demonstrate transformative neighborhood revitalization, and/or unique financial funding and leveraging opportunities, and/or the opportunity to promote significant job growth in proximity to such housing. The Strategic Investment Category has been created to attempt to address these circumstances. As part of its review for projects submitting an application for the Strategic Investment Category, MSHDA will give consideration to the following: Projects that are a part of an overall development plan with multiple different components that will be transformative to the community or neighborhood in which it is located; Projects representing a new and strategic housing initiative that meet a demonstrated need, an initiative which may not currently be contemplated by the QAP. Applicants can apply for the Strategic Investment set-aside in addition to one of the other set-aside categories (p. 25 QAP).

A4b: Opportunity Criteria score is now a tiebreaker and the number of points available for proximity to amenities has been doubled (from 10 to 20), changing the ranking from moderate/weak positive to strong positive. Amenities have also been defined, while they were not defined in previously evaluated QAP.

A5: Proximity to amenities includes points for proximity to public schools.

A8: Point award for projects located where a community revitalization plan is in place was reduced from 10 points to 2 points.

B1: Point award for projects receiving local support in the form of tax abatement was reduced from 15 points to 3 points. Strong negative ranking changed to moderate/weak negative.

F1: Provision requiring family projects to reserve at least 10% of the 2+ bedroom units for households with children was removed.

F2: Provisions added awarding points for accessible community space for use by tenants with children and services directed toward children/youth.

H1: MSHDA added provision describing data collection, including racial/demographic, to support its mission and DEI goals.

O2: 30% basis boost available to PSH projects reduced to 20%. Added provisions encouraging development of Recovery Housing and points award for PSH developments.

STATE: Minnesota (QAP 2022-23)	Minnesota Housing Finance Agency (Minnesota Housing)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Minnesota is divided into two general geographic areas: (1) the Metropolitan Area and (2) the Greater Minnesota Area, which consists of the balance of the state. Distribution of tax credits between the two general areas is based on each area's percentage share of the entire state's total of public assistance recipients. For Greater Minnesota the percentage is 39%, and for the Metropolitan Area the percentage is 61% (p. 7-8). ❖ Minnesota Housing may consult with local communities, PHAs, and HUD to determine the marketability of projects. If, in the opinion of Minnesota Housing, the issuance of the tax credits to a project could be detrimental to existing rental property, Minnesota Housing will not issue tax credits to the applicant (p. 42). [Could also speak to a negative for B1 in terms of the power that community input could have on funding decisions.]
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ (-) 8-10 points possible for projects located in communities with a need for more affordable housing options because either there is a low share of

	affordable rental housing compared to all housing options in a community or a large share of renters are cost burdened by their rent (Self Score Worksheet p. 20). [Negative provision to the extent that a large share of cost burdened renters encourages racial and economic concentration]
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	❖ Preference will be given to proposals that provide housing in communities with job growth (QAP p. 42).
A4b. Scoring that encourages development in high opportunity areas.	❖ 3-6 points possible for projects located in or near a city or township needing workforce housing (communities having a large number of jobs or job growth, individual employer growth, or having a large share of their workforce commuting long distances (Self-Scoring Worksheet p. 20-1).
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ⁵¹	<ul style="list-style-type: none"> ❖ (-) [One of 4 possible threshold reqs]: Projects which preserve existing subsidized housing in order to prevent conversion to market rate housing or to remedy physical deterioration which would result in the loss of federal subsidies (Self Score Worksheet p. 6-7). (See Threshold Req in Notes). ❖ (-) Projects sited in QCTs or DDAs may be eligible for a greater amount of HTCs than the legislated maximum HTC percentage (QAP p. 19). ❖ (-) 3 points possible for projects located in a QCT (Self-Scoring Worksheet p. 26-7). ❖ (-) Up to 40 points for Preservation (Self-Scoring Worksheet p. 13-16).
A7. Scoring or requirements that preference siting near mass transit.	❖ Up to 9 points possible for projects with access to transit and high walkability. Different requirements for projects based on location in the Metropolitan Area or Greater Minnesota (Greater MN is further divided into “Urbanized Areas” and Rural and “Small Urban Areas”) (Self Score Worksheet p. 21-2).

⁵¹ 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>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [One of 4 possible threshold reqs]: If in the metropolitan area, substantial rehabilitation projects in neighborhoods targeted by the city for revitalization (Self Score Worksheet p. 6-7). [See Threshold Req in Notes.] [Strong (as a threshold req) but does not outline what is in this city targeting.] ❖ 3 points possible for projects located in a Community Revitalization Area (Self-Scoring Worksheet p. 26-7).
<p>B1. Local participation in site selection is limited to statutory minimum.⁵²</p>	<ul style="list-style-type: none"> ❖ See A1. ❖ (-) Up to 16 points to projects receiving funds from the local municipality. (local contributions may be in the form of tax increment financing, reservation land not subject to local property taxes, historic tax credits, monetary grants, tax abatement, land donation of the development site (Self-Score Worksheet p. 28).
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ Affirmative Fair Housing Marketing Regulations, held as centrally important by Minnesota Housing, require that each applicant carry out an affirmative marketing program to attract prospective buyers or tenants of all majority and BIPOC groups in the housing market area regardless of race, creed, color, religion, sex, national origin, marital status, status with regard to public assistance, disability, sexual orientation, or familial status. At the time of 8609, all applicants must submit an Affirmative Fair Housing Marketing Plan documenting an acceptable plan to carry out an affirmative marketing program (Self Score Worksheet p. 5).
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<p>No.</p>
<p>C3. Scoring that incentives language access and marketing to non-English speakers.</p>	<p>No.</p>
<p>D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.</p>	<p>No.</p>
<p>D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Applicants applying for HTCs must sign a certification agreeing to utilize the public housing and Section 8 waiting lists as applicable (QAP p. 50).
<p>F1. Incentives for larger family units.</p>	<ul style="list-style-type: none"> ❖ [One of 4 possible threshold reqs]: If in the metropolitan area, new construction or substantial rehab family housing projects that are not restricted to

⁵² Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>persons 55 years old or older in which, for the term of the extended use period, at least 75% of the total tax credit units contain 2+ bedrooms and at least 1/3 of the 75% contain 3+ bedrooms (Self Score Worksheet p. 6-7). [See Threshold Req in Notes.]</p> <ul style="list-style-type: none"> ❖ 12-15 points for projects that provide family housing that is not restricted to persons 55+. The owner must market to families with minor children (Self Score Worksheet p. 8). <ul style="list-style-type: none"> • 12 pts if at least 75% of the total assisted5 units contain two or more bedrooms and at least 1/3 of the 75% contain three or more bedrooms. • 3 additional pts possible if at least 1/3 of three or more bedrooms required above contain four or more bedrooms.
<p>F2. Incentives targeting families/families with children</p>	<ul style="list-style-type: none"> ❖ See F1—owner must market to families with minor children to meet threshold requirement.
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ [One of 4 possible threshold reqs]: If in the metropolitan area, new construction or substantial rehabilitation in which, for the term of the extended use period (term of the LURA), at least 75% of the total HTC units are single room occupancy, efficiency, or one bedroom units with rents affordable to households whose income does not exceed 30% of the area median income (AMI) (Self Score Worksheet p. 6-7); [See Threshold Req in Notes.] ❖ 7-32 points possible for projects that set aside and rent to High Priority Homeless who are households prioritized for permanent supportive housing by the Coordinated Entry System. More points awarded for a higher percentage of units set aside in the project for targeted populations (Self Score Worksheet p. 9). ❖ Up to 20 points possible for projects that reserve units that have rents affordable to HHs whose incomes do not exceed 30% or 50% of median income without rental assistance (Self-Score Worksheet p. 19). ❖ Up to 26 points to projects that have entered into a fully executed binding agreement with the governing body for project based rental assistance which is effectively project-based by written contract or for project-based vouchers. New or transferred federal rental assistance contracts that were executed within the past 15 years are eligible towards meeting

	required Rental Assistance percentages (Self-Score Worksheet p. 17-19). [Could also be a negative in A6, but this seems to be more focused on the agreements for new PBRA.]
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ All HTC recipients must submit an annual certification that with occupancy data including demographic data, income, student status, and rent (QAP p. 23).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ See Threshold Req in Notes. ❖ 7-13 points possible for permanent housing proposals that are not restricted to persons of a particular age group and in which a minimum of 5% of the total units are set aside for persons with disabilities (Self Score Worksheet p. 11)
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ See Threshold Req in Notes. ❖ 3 points for projects where 100% of the total assisted units will be restricted and marketed to seniors 55 years or older. 4 additional points possible for projects that further restrict the units' incomes to the county 30% MTSP income (Self Score Worksheet p. 8).
O3. Scoring to promote home ownership.	❖ Projects intended for eventual tenant ownership will receive a preference during the selection process when reviewing tie breakers (Self Score Worksheet p. 3).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ At the discretion of Minnesota Housing, any failure to comply with Minnesota Housing's Fair Housing policies or Tenant Selection Plan Guidelines, procedures, or requirements may be penalized according to Minnesota Housing's Fair Housing policy, up to and including disqualification of the application. In addition, under the HTC program, Minnesota Housing may impose up to a -35 point penalty on future HTC developments to all parties involved in ownership and/or management on the development(s) that are found in non-compliance (QAP p. 15). ❖ It is the policy of Minnesota Housing to affirmatively further fair housing in all its programs so that individuals of similar income levels have equal access to Minnesota Housing programs (QAP p. 35).
Change since 2015?	A2; A4a/A4b; A6; A7; C1; C2; H1; O3; O4

Access **22-23 Self Scoring Worksheet** here:

https://www.mnhousing.gov/content/published/api/v1.1/assets/CONT97F17BDD9ACA4FEAB6B64C04C8CC86B8/native?cb= cache_53de&channelToken=294436b7dd6c4570988cae88f0ee7c90&download=false

TOTAL POINTS POSSIBLE: 252. Must be eligible for 80 points for 9% volume cap credit. Must be eligible for 40 points for 4% tax exempt volume limited bonds (Scoring systems is such that points can be gained or lost.)

Notes: [Threshold Requirements] Applications submitted in Round 1 must meet one of the following threshold types (Self Score Worksheet p. 6-7):

- *If in the Metropolitan Area:*
 1. New construction or substantial rehabilitation in which, for the term of the extended use period (term of the LURA), at least 75% of the total HTC units are single room occupancy, efficiency, or one bedroom units with rents affordable to households whose income does not exceed 30% of the area median income (AMI). (**G1**);
 2. New Construction or substantial rehab family housing projects that are not restricted to persons 55 years old or older in which, for the term of the extended use period, at least 75% of the total tax credit units contain two+ bedrooms and at least 1/3 of the 75% contain 3+ bedrooms (**F1**);
 3. Substantial rehabilitation projects in neighborhoods targeted by the city for revitalization (**A8**).
- *If Outside the Metropolitan Area:*
 1. Projects which meet a locally identified housing need and which are in short supply in the local housing market as evidenced by credible data such as local council resolution submitted with the application [not totally clear which category this fits into – could be for housing in high-income/opportunity non-metro areas, could also speak to a need for local support.]
- *Projects that set aside units for special populations (persons with mental illness, developmental disabilities, drug dependency, brain injury, physical disabilities) (O1, O2).*
- *Projects, whether or not restricted to persons of a particular age group, which preserve existing subsidized housing, if the use of HTCs is necessary to (1) prevent conversion to market rate use; or (2) to remedy physical deterioration of the project which would result in loss of existing federal subsidies (A6).*
- *Projects financed by Rural Development, which meet statewide distribution goals*

CHANGES SINCE 2015:

A2: Added a moderate point award for communities with cost burdened renters.

A4a/A4b: Large point award for projects located in top ten area of job or population growth has been changed to a positive preference. Added small point award for workforce housing.

A6: Added large point award for preservation projects and additional incentives for siting in QCTs/DDAs.

A7: Added moderate point award for project with access to transit and high walkability.

B1: Weak/moderate negative local participation provision changed to strong negative. Point award was increased from small to large point award.

C1: MN Housing added Affirmative Fair Housing Marketing Regulations.

C2: Removed small point award for projects marketing to underserved populations.

H1: HTC recipients are now required to submit annual certification with demographic data.

O3: Small point award for projects intended for eventual tenant ownership has been changed to a tiebreaker provision.

O4: Added strong point penalty for failure to comply with Minnesota Housing’s Fair Housing policies or Tenant Selection Plan Guidelines, procedures, or requirements.

Mississippi: (QAP 2023)	Mississippi Home Corporation
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	<ul style="list-style-type: none"> ❖ 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. 12)
A2. Scoring that discourages racial and economic concentration.	<ul style="list-style-type: none"> ❖ 5 points may be awarded to developments that are fully located in a zip code which has not had any tax credit developments funded or placed in service for the previous 5 years of the current year Tax Credit Cycle (p. 60) ❖ 5 points will be deducted if an applicant proposes a new development in a primary market area that has received 3 or more tax credit awards during the previous two years (p. 72)
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.	<ul style="list-style-type: none"> ❖ 10 points may be awarded to developments located in a High Opportunity Area (see notes) (p. 60) ❖ 10 points may be awarded for developments in Business Development Areas (BDAs). BDAs are specifically situated to spur economic growth by attracting new industry to promote business opportunities through job creation, expansion, and infrastructure improvements (p. 61)

	<ul style="list-style-type: none"> ❖ 2 points may be awarded to a proposed development that has at least two of the following services located within 3 miles of the proposed site: Grocery Store, Pharmacy, Bank or Credit Union, Hospital or Medical Clinic (p. 64)
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ⁵³	<ul style="list-style-type: none"> ❖ Developments combining LIHTC with HUD housing assistance may be subject to a subsidy layering review (p. 43) ❖ [Tiebreaker] A development to be located in a QCT shall take precedence over one that is not (p.74)
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ 2 points for developments that include a Walking, Jogging, or Biking Trail. The trail must be an asphalt or concrete paved surface measuring at least 5 feet in width and a minimum of ¼ mil in distance. The trail must be separate from the required sidewalks (p. 65) ❖ 2 points for a multi-purpose bus stop structure. The structure must be covered to protect waiting passengers from the elements. The structure must provide seating and a trash container (p. 65) ❖ 2 points for participation in the Mississippi Department of Transportation Ride Share Availability Program (p. 65)
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 5 points may be awarded to developments located in a community that has a concerted revitalization plan (p. 60).
B1. Local participation in site selection is limited to statutory minimum. ⁵⁴	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The applicant is required to notify the CEO (Mayor or President of the Board of Supervisors) and Elected Representative for the district in which the proposed development will be located, of its intent to apply for housing tax credits (p. 22)

⁵³ 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.

⁵⁴ Evidence of the inverse: preferences or requirements for local participation should also be noted.

HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ All Owners and Management Entities of Special Needs Housing Developments are required to demonstrate continuous marketing efforts to serve the targeted special need population elected. The application package must include (a) a market study that addresses the housing priority for the specialized need; (b) a marketing plan that identifies how the development will market to the targeted population; and (c) a comprehensive service plan that identifies each supportive service to be provided, the location of the services, the anticipated service provider for each service and their experience in providing service to the targeted population (p. 69)
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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ Developments receiving tax credits must commit to providing housing for persons on public housing waiting lists, or those in jurisdictions where there is no housing authority, (ii) for persons on waiting lists for other affordable housing developments. The application package must include a signed written statement from the Applicant stating it will inform the local public housing authority (PHA) of vacancies and to give priority to households on PHA waiting lists who apply for occupancy (p. 11). ❖ [Compliance Monitoring] Owner must certify 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 Voucher (p. 48).
F1. Incentives for larger family units.	No
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 2 points if the development provides a playground. The playground equipment

	must be of commercial grade with a minimum of four separate play activities. Multi-functional single structures are acceptable provided that it has at least 4 separate play activities (p. 65).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ 5 points will be awarded to developments that set aside at least 15% of the total units for persons whose income does not exceed 30% of the AMI (p. 69).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ 13 points will be awarded to developments that set aside a minimum of 7% but no more than 20% of the total development units for persons targeted by the Mississippi Affirmative Olmstead Initiative (p. 70).
O2. Scoring that promotes units for special needs populations.	❖ 10 points for Housing for Veterans. A minimum of 10% of the units must be set aside for veterans (p. 70).
O3. Scoring to promote home ownership.	❖ (As part of the 10 points for New Construction) Optional Lease Purchase Option for Tenants: Lease Purchase developments are Single Family Homes that will convert to tenant ownership at the end of the 15-year compliance period. The application must include a sample lease-purchase agreement. The agreement must advise tenants of the available purchase option at the end of the 15-year lease period (p. 67).
O4. Provisions affirmatively furthering fair housing laws.	❖ [Compliance Monitoring] Owner must certify that no finding of discrimination under the Fair Housing Act has occurred for the development (p. 48). ❖ QAP includes a full section on Fair Housing Accessibility Requirements (p. 52-55).
Change since 2015?	A2; A4b; A6; A7; A8; B1; F1/F2; O1; O2

2023 QAP: <https://archivemhc.com/htc/2023/2023%20Qualified%20Allocation%20Plan.pdf>

NOTES

- High Opportunity Areas are defined as areas where there is availability of sustainable employment, a low poverty rate, and/or high performing schools.
 - MHC has identified several opportunity tracts as being qualified as a High Opportunity Area. To make this determination, MHC considered the following:
 - For Rehabilitation - Census Tract that met the following conditions:
 - 1. Median HHI \geq \$24,864 (50% of MS 2022 Statewide Median HHI estimate ESRI Nov 2022 estimate)
 - 2. Projected 2022-2027 Population Growth \geq -1.25% (ESRI Nov 2022)
 - 3. Projected 2022-2027 Median Household Income Growth \geq 0.01% (ESRI Nov 2022 estimate)
 - 4. 2022 Unemployment Rate \leq 4.8% (MDES Aug 2022)
 - 5. Located in County that had \geq 4.2% (state average) new hires between 2021Q3-2022Q3 (MDES Nov 2022) (OR)
 - A-B Rated School District as determined by the Mississippi Department of Education Accountability Performance Results.
<https://msrc.mdek12.org/>.
 - For New Construction - Census Tract that met the following conditions:
 - 1. Median HHI \geq \$34,809 (70% of MS 2022 Statewide Median HHI estimate ESRI Nov 2022 estimate)
 - 2. Projected 2022-2027 Population Growth \geq -0.50% (ESRI Nov 2022)
 - 3. Projected 2022-2027 Median Household Income Growth \geq 0.01% (ESRI Nov 2022 estimate)
 - 4. 2022 Unemployment Rate \leq 3.8% (MDES Aug 2022)
 - 5. Located in County that had \geq 4.2% (state average) new hires between 2021Q3-2022Q3 (MDES Nov 2022)

TOTAL POINTS POSSIBLE: Competitive Applications must score a minimum of eighty-five (85) points to be considered for a reservation of housing tax credits. Tax Exempt Bond Applications must score a minimum of seventy (70) points to be considered for housing tax credits.

CHANGES SINCE 2015

- **A2:** Points no longer given specifically for Housing Need Point Eligibility
- **A4b:** Points not given for developments in High Opportunity Areas, Business Development Areas, and proximity to Services
- **A6:** Points no longer allocated for multifamily or single family rehabilitation developments that have been identified as endangered
- **A7:** QAP now includes provisions providing points for siting near mass transit
- **A8:** Provision now specifically mentions a concerted community revitalization plan
- **B1:** Local participation is a threshold requirement
- **F1/F2:** QAP no longer includes points for large family housing (3+ bedrooms), but does include a provision providing points for developments providing a playground in support of families/families with children
- **O1:** Fewer points allocated to developments with units for persons with disabilities, and set-aside requires a lower percentage of units for persons with disabilities

- **O2:** Points now allocated for housing for veterans

STATE: MISSOURI (QAP 2022)	Missouri Housing Development Commission (MHDC)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ [Selection Criteria] An attempt will be made to allocate credits across the state on a population proportionate basis, with the state divided into the following areas (p. 29): St. Louis Region - 33%: Franklin, Jefferson, St. Charles, St. Louis City and St. Louis counties. Kansas City Region - 19%: Cass, Clay, Jackson, Platte and Ray counties. MSA-Rural Region – 20%: Cape Girardeau MSA (Cape Girardeau and Bollinger counties), Columbia MSA (Boone, Cooper and Howard counties), Jefferson City MSA (Callaway, Cole, Moniteau and Osage counties), Joplin MSA (Jasper and Newton counties), Springfield MSA. Rural Region - 28%: All other counties. ❖ Developments shall not be located where the total of publicly subsidized housing units (as defined in the Market Study Guidelines) equal more than 20% of all units in the census tract where the development will be located (p. 32).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ Mixed Income Development: Developments that have at least 10% market rate units or Income Averaging Units at 80% AMI will be awarded 10 points (p. 25). ❖ (-) Development proposals that include committed rental assistance for at least 15% of units will be awarded 5 points (Rural, Project Based Section 8 or Public Housing developments only (p. 27). [Also a moderate/weak positive provision in G1] ❖ (-) Households spending more than 50% of gross monthly income on housing are termed severely cost burdened. Applications that propose a development

	<p>in a county where the percentage of severe cost burdened renter households exceeds 10% can receive up to 10 points (p. 25). [Negative provision to the extent that a large share of cost burdened renters encourages racial and economic concentration]</p> <p>See notes on Opportunity Areas.</p>
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	<p>See notes on Housing Priorities and Opportunity Areas.</p> <p>See A4b.</p>
A4b. Scoring that encourages development in high opportunity areas.	<ul style="list-style-type: none"> ❖ [Housing priority] Projects that qualify for the Opportunity Area development type receive 45 points (p. 23). See notes on Opportunity Areas. [Also applies to A2, A4a, A5, and A7]. ❖ Family sites in an Opportunity Area will be awarded 7 points (p. 26) [Also applies to F2]. ❖ Up to 5 points may be awarded to applicants that prove an intentional link to a new and planned economic development project. This link will be demonstrated by its proximity to the development, direct transportation connections between the housing and jobs, and demonstrated coordination between the housing and economic development project. Both family and senior developments ages 55+ and 62+ are eligible for economic developments points (p. 26). <p>See notes on development eligible for basis boosts.</p>
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ Opportunity Areas definition includes access to high-performing school systems. See A4b and notes on Opportunity Areas.

<p>A6. Scoring that discourages development in distressed neighborhoods.⁵⁵</p>	<ul style="list-style-type: none"> ❖ (-) 10 points to projects that qualify for the Preservation priority (p. 26). ❖ (-) [Housing priority] Projects that qualify for the Preservation development type receive 45 points (p. 23). ❖ As part of a MOU between HUD and MHDC, developments using the Federal LIHTC with other state or federal subsidy programs are subject to a subsidy layering review by MHDC. The MOU requires that HUD and MHDC share information on the developer’s disclosure of sources and uses of funds for all developments financed with both the Federal LIHTC and HUD Housing Assistance. This review is designed to ensure that such developments do not receive excessive federal assistance (p. 11). <p>(-) See notes on development eligible for basis boosts.</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>See A4b and notes on Opportunity Areas.</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Selection Criteria] Development Location will be analyzed for each application and will include careful consideration of: location in a qualified census tract that will contribute to a concerted community revitalization plan; whether existing housing is used as part of a community revitalization plan; location in a community with demonstrated new employment opportunities and a proven need for workforce housing; infill of existing stable neighborhoods; commission-designated Targeted Areas (p. 32). ❖ [Selection Criteria] Community Impact will be analyzed for each application and will include careful consideration of

⁵⁵ 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>catalytic effects (whether developments will successfully encourage further development or redevelopment in the community; whether developments that are part of a larger community redevelopment effort or part of a concerted community revitalization plan) (p. 34).</p>
<p>B1. Local participation in site selection is limited to statutory minimum.⁵⁶</p>	<ul style="list-style-type: none"> ❖ (-) Developments that have executed Letters of Intent (LOIs) for municipal funds receive up to 10 points, based on the percentage of award as it relates to the Total Development Budget—3 points for >2.5%, 5 points for >5%. 10 points for >7.5% (p. 27). ❖ (-) [Selection Criteria] Community Impact will be analyzed for each application and will include careful consideration of comments from the local jurisdiction, including but not limited to chief executive officers and community members (p. 34).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ Family developments proposed in opportunity areas are required to include an affirmative marketing plan that proactively reaches out to families currently living in census tracts where the poverty rate exceeds 40% (p. 19). ❖ All projects must provide an executed and complete HUD Form 935.2A/935.2B: Affirmative Fair Housing Marketing Plan. In addition, the management company must identify how it intends to comply with the HUD requirements to Affirmatively Further Fair Housing beyond what may be included in the Affirmative Fair Housing Marketing Plan (Dev. Guide p. 87).
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<p>No.</p>
<p>C3. Scoring that incentives language access and marketing to non-English speakers.</p>	<p>No.</p>

⁵⁶ Evidence of the inverse: preferences or requirements for local participation should also be noted.

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.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ [Housing priority] Service-enriched housing for families with children receives 45 points (p. 23)[Also applies to O1 and O2]. <p>See A4b.</p>
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Developments that target a percentage of units to lower income households will be awarded up to 10 points. Point award varies based on MSA/county--additional points are progressively awarded for percentage of units at 50%, 40% and 30% AMI (p. 24). <p>See A2.</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ All developments with 12+ units must have ≥5% of units designed in compliance with one of the nationally recognized standards for accessibility to wheelchair users and an additional 2% of the units usable by those with hearing or visual impairments; All new construction projects must be designed and constructed in accordance with universal design principles (p. 4). <p>See O2, F2.</p>
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Developments that qualify for the Set-Aside Preference and commit to setting aside 15% or more of the units for permanent supportive housing and/or vulnerable population tenants will receive 5 points (p. 25) [Also applies to O1]. ❖ [Housing priority] Projects that qualify for the Permanent Supportive Housing, Vulnerable Populations, and Independence Enabling development

	<p>types receive 45 points (p. 23) [Also applies to O1].</p> <p>See F2 and notes on development eligible for basis boosts.</p>
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ Developments intended for 100% eventual tenant ownership at the end of the 15-year compliance period will receive 5 points. To qualify for the points, the owner must provide a detailed tenant ownership plan that complies with the Internal Revenue Code and is acceptable to MHDC (p. 25).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Pursuant to the Fair Housing Act (and including any and all regulations and guidance promulgated by HUD thereunder), discrimination on the basis of race, color, religion, national origin, sex, disability or familial status is strictly prohibited. In addition to prohibiting discrimination, the Fair Housing Act also imposes an obligation to affirmatively further the goals of the Fair Housing Act. MHDC is fully committed to affirmatively furthering fair housing by taking meaningful actions to promote fair housing choice, overcome patterns of segregation, and eliminate disparities in access to opportunity, and consequently, MHDC will consider the extent to which a certain development affirmatively furthers fair housing when deciding which developments should be recommended for funding (p. 4).
Change since 2015?	A1; A2; A4a; A4b; A5; A6; A7; F2; G1; O1; O2; O3

QAP (2022): <https://mhdc.com/media/jsnbq414/qualified-allocation-plan.pdf>

2022 MHDC Developer’s Guide: <https://mhdc.com/media/pmlhpgkn/2022-developers-guide.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 186

Housing Priorities that will receive priority consideration include: Nonprofit (10%), Set-aside Preferences (33%), Service enriched housing (**F2, O2**), preservation of existing affordable housing (**A6**), developments in Opportunity Areas (see below) (**A4a, A5, A7**). Housing Priority applications are assigned 45 points.

Set-aside Preferences: In addition to projects located in QCTs and DDAs (that are eligible for the 30% basis boost), projects outside of QCTs and DDAs are eligible for a 30% basis boost if (among other criteria) they fall into one of the following categories:

- Set-aside Preferences: the project commits to a Permanent Supportive Housing set aside of at least 10% of the total units (**O1**); the project commits to a set-aside of at least 10% of the total units for vulnerable persons (vulnerable person defined a person who is: (a) homeless, as defined by HUD, including survivors of domestic violence and human or sex trafficking; or (b) a youth transitioning out of foster care) (**O2**); the project offers significant services tailored to the tenant population (“Service-Enriched Priority”) (**F2, O1, O2**).
- Preservation priority
- Independence Enabling Housing Units (IEH)--units that are developed to serve persons in need of permanent supportive housing who wish to live independently but who may need additional assistance from a caregiver who resides in a Companion Living unit that is associated with a specific IEH unit. Part of the Set-aside Preference.
- Veteran’s Housing. Part of the Service-Enriched Priority.
- Workforce Housing: Developments in counties with a median income less than the 2022 statewide median income, where 15% to 25% of the total units in the development are set aside for households earning between 60% and 80% (workforce units) of the area median income (**A6**).

Opportunity Areas (p. 19): MHDC encourages affordable housing developments in opportunity areas by targeting communities that meet the following criteria: access to high-performing school systems (**A5**), transportation and employment (**A7**); as well as being located in a census tract with a 15% or lower poverty rate (**A4a, A2**). Family developments that meet these criteria will receive a preference in funding. Family developments proposed in opportunity areas are required to include an affirmative marketing plan that proactively reaches out to families currently living in census tracts where the poverty rate exceeds 40% (**C1**). Developments that apply under this priority must also apply under the Service-Enriched Priority.

CHANGES SINCE 2015

A1: Added strong provision limiting development to census tracts where publicly subsidized housing accounts for 20% or less of total units available.

A2: QAP now awards points for mixed income development.

Points for development in an Opportunity Area impacts **A2, A4a, A4b, A5, A7, and F2**, where points were not previously awarded.

A4b: Added a small point award for “an intentional link to a new and planned economic development project.”

A6: Large point awards for Preservation priority (preservation of existing affordable housing) are strong negative provisions.

Points for Service enriched housing priority impacts **F2, O1, and O2**, where points were not previously awarded.

G1: MHDC added a point award for deeper income targeting. Previously deeper income targeting received “a preference in funding.”

Points for Permanent Supportive Housing, Vulnerable Populations, and Independence Enabling development priority impacts **O1** and **O2**, where points were not previously awarded.

O3: QAP now awards points for projects intended for eventual tenant ownership.

STATE: MONTANA (QAP 2024)	Montana Board of Housing (MBOH)
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	❖ Under Project Characteristics: An Application will qualify with respect to an amenity or service if a grocery store or medical services appropriate and available to all prospective tenants and the project is either: located within 1½ miles of the specified amenity or essential service OR Public or contracted transportation is reasonably available to the specified amenity or service (i.e., the Project is located within ¼ mile of fixed bus stop or on a same day call basis) (or letter from provider committing to establish such service); OR the specified amenity or service is available via a no-charge delivery service to the Project Location (p. 16).
A4a. Scoring that encourages development in high-income areas.	No.
A4b. Scoring that encourages development in high opportunity areas.	No.
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ⁵⁷	❖ (-) Under Project Characteristics: Compliance if the Application proposes the preservation of existing affordable housing stock (including as part of a local (not national, state or regional) community revitalization plan or similar plan) (p. 16).

⁵⁷ 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.

	<ul style="list-style-type: none"> ❖ Basis Boost: Applications for Projects not located in an area designated by HUD as a DDA or a QCT may request Housing Credits calculated at up to 130% of eligible basis (p. 22).
A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	<p>See A6.</p> <ul style="list-style-type: none"> ❖ Under Local Involvement: Compliance if the Project is located in a qualified census tract (“QCT”), and its development contributes to or involves existing housing as part of a local (not national, state or regional) community revitalization plan or similar plan. The Application must include any such local community revitalization plan and identify where in the plan such existing housing may be found (p. 17).
B1. Local participation in site selection is limited to statutory minimum. ⁵⁸	<p>(-) Under Local Involvement: Compliance if the Application includes documentation of Local Community Input in the form of (at least one):</p> <ul style="list-style-type: none"> • local neighborhood meetings held expressly for this Application; • local charrettes held expressly for this Application with supporting documents, concept drawings, and input from local community; • other appropriate form of local community input specifically designed to gather local community input for this Application; and/or • City or County Commission meeting (p. 17). <p>(-) Under Local Involvement: Compliance if the Application includes a commitment by a local entity to provide of at least one of the following:</p> <ul style="list-style-type: none"> • screening and referring of individuals as prospective tenants; • on-site service coordination to Project tenants; • donation of land or sale at a reduced price;

⁵⁸ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<ul style="list-style-type: none"> • funds to develop infrastructure or for other uses; • significant waivers on local government fees; or • other forms of significant monetary or in-kind support (p. 17).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No.
C2. Scoring that incentivizes affirmative marketing.	❖ Any units targeted as Permanent Supportive Housing for persons with disabilities must describe the strategy that will be used to market available units to disabled persons throughout the Extended Use Period (p. 18).
C3. Scoring that incentivizes 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 in high-opportunity areas.	No.
F1. Incentives for larger family units.	❖ Under Tenant Populations with Special Housing Needs: Compliance if an application for a family project commits to targeting or meeting at least 10% of its units for individuals with children or large families (three or more bedrooms) (p. 18).
F2. Incentives targeting families/families with children	See F1.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	No.
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ The Owner must assist MBOH in meeting federal reporting requirements by collecting and submitting information annually concerning the race, ethnicity, family composition, age, income, use of rental assistance under section 8(o) of the United States Housing Act of 1937 or other similar assistance, disability status, and monthly rental payments of all qualified households (p. 43).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	Under Tenant Populations with Special Housing Needs: Compliance if an application for a family

	<p>project commits to targeting or meeting at least 10% of its units</p> <ul style="list-style-type: none"> • meeting Section 504 fully accessible requirements (other than features for persons with hearing or visual disabilities, which can be limited to 5% of units); • targeted as Permanent Supportive Housing for persons with disabilities (p. 18).
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ Under Tenant Populations with Special Housing Needs: Compliance if an application for a family project commits to targeting or meeting at least 10% of its units targeted to veterans, victims of domestic violence, or youth aging out of foster care (p. 18). ❖ Under Tenant Populations with Special Housing Needs: Compliance if an application for a new construction Elderly Project will meet Section 504 fully accessible requirements on 20% of units (other than features for persons with hearing or visual disabilities, which can be limited to 10% of units) (p. 19).
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ Projects proposing eventual tenant ownership must include supplemental documents including information on how the owner will transfer ownership to qualified homebuyers, pricing process, and documentation that potential owners will be required to complete a homebuyers counseling program (p. 21-22).
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<p>The Fair Housing Act, including design and accessibility requirements, applies to HC properties (Appx. B: Design Requirements).</p> <ul style="list-style-type: none"> ❖ The owner, developer, borrowers and any of their employees, agents, or sub-contractors in doing business with MBOH understand and agree that it is the total responsibility of the owner(s) to adhere to and comply with all Federal Civil Rights legislation inclusive of the Fair Housing Laws, ADA as well as any State and local

	Civil Rights legislation along with any required related codes and Laws (p. 48).
Change since 2015?	B1; D2; G1; O2

QAP (2024): [https://housing.mt.gov/ shared/Multifamily/docs/2024QAP.pdf](https://housing.mt.gov/shared/Multifamily/docs/2024QAP.pdf)

NOTES:

QAP states that “Only those Applicants invited to do so by the Board may submit Applications.” (p. 6)

TOTAL POINTS POSSIBLE: No set point-scoring system--“The MBOH Board will select Applications to receive an Award that it determines best meet the most pressing affordable housing needs of low-income people in Montana, taking into consideration:

- all of the requirements, considerations, factors, limitations, Development Evaluation Criteria, set asides, priorities and data set forth in this QAP and all federal requirements;
- the Development Evaluation Criteria; and
- all other information provided to the MBOH Board regarding the applicant Projects (p. 19).

Set-asides include: non-profit (10%) and corrective award (p. 8).

[A significant amount of discretion is still afforded to MBOH over and above evaluation criteria.]

As reflected: Evaluation criteria scoring is only one of several considerations taken into account by MBOH and does not control the selection of projects that will receive an award of tax credits. In addition to any other Selection Criteria specified in this QAP, MBOH may consider the following factors in selecting projects for an award of tax credits to qualifying projects:

- **The geographical distribution of tax credit projects; (A1)**
- The rural or urban location of the projects;
- **The overall income levels targeted by the projects;**
- **The need for affordable housing in the community;**
- **Rehabilitation of existing low-income housing stock;**
- Sustainable energy savings initiatives;
- Financial and operational ability of the applicant to fund, complete and maintain the project through the extended use period;
- Past performance of an applicant in initiating and completing tax credit projects; and
- Cost of construction, land and utilities.
- the Project is being developed in or near a historic downtown neighborhood;
- frequency of Awards in the respective areas where Projects are located;
- preserving project rental assistance or have or are planning to add Section 811 units to an existing project; and/or
- augmentation and/or sources of funds.

CHANGES SINCE 2015:

MBOH does not use a scoring system to award tax credits (see notes above). Relative weight applied to project characteristics is unclear, making comparison to the previously evaluated QAP more difficult.

B1: Local participation seems somewhat less influential, as this QAP does not require letters of community support.

D2: Previously evaluated QAP noted that MBOH will put all LIHTC properties into the free State approved Housing Locator website, MTHousingSearch.com. This QAP does not contain that language or a similar provision.

G1: Provisions awarding points for promoting units for lowest-income HHs are no longer present in the QAP.

O2: MBOH added provision encouraging developments with units for seniors, veterans, victims of domestic violence, or youth aging out of foster care.

NEBRASKA: (QAP 2022/2023)	Nebraska Investment Finance Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ NIFA reserves the right to not allocate LIHTC and AHTC for any development, regardless of ranking/scoring, if NIFA determines in its sole discretion that a disproportionate number of LIHTC developments have been developed in a particular census tract within the past 3-year period (p. 29)
A2. Scoring that discourages racial and economic concentration.	❖ 3 points for mixed-income developments (p. 6) ❖ 3 points if the development is located in a community with a total population of 5,000 or less (App, p. 31) [under the assumption that this provision promotes geographic diversity]
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.	❖ 2 points for developments located in DED Community/Entitlement Community/Leadership Community/CDBG Entitlement Community (App, p. 23) ❖ 4 points for developments in metro areas of High Opportunity (p. 6) ❖ Maximum 4 points are available for Supportive Services. All services must be paid for by the owner. Categories of service include: Health; Finance;

	<p>Education, Counseling, or Training; Community and Care (App, p. 28-29)</p> <ul style="list-style-type: none"> ❖ NON-METRO ONLY. Up to 2 points for proximity to services (must be located within 3 miles of the proposed location) <ol style="list-style-type: none"> 1. Grocery Store, Farmer’s Market, and/or Pharmacies 2. Hospital, Medical Clinics, and/or Urgent Care 3. Schools, Daycare Center, Senior Center, and/or Community Center 4. Public Park and/or Library (must be located within ½ mile of proposed location) (App, p. 30) ❖ METRO ONLY. Up to 1 point for developments located in areas of high opportunity in three indexes (Education, Health and Environment, and Social and Economic). Data is available for each census tract with a rating of very high opportunity to very low opportunity in each index. If a proposed development obtains a very high rating in all three indexes, applicants will receive an additional 1 point (App, p. 32)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>See A4b</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁵⁹</p>	<ul style="list-style-type: none"> ❖ 2 points for projects located in a Qualified Census Tract (QCT) or a Difficult Development Area. 1 additional point if the proposed development is part of a neighborhood redevelopment plan or leverages public and private dollars to support locally-driven strategies that address struggling neighborhoods with distressed public or HUD-assisted housing through a comprehensive approach to neighborhood transformation (Application, p. 11)

⁵⁹ 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.

	<ul style="list-style-type: none"> ❖ (-) NIFA may increase or “boost” the eligible basis of a particular development for purposes of the allocation of LIHTC by up to 30% for designated buildings that are located outside of an established Qualified Census Tract (QCT) or Difficult Development Area (DDA) (p. 24) (authorized by HERA 2008) ❖ 2 points if the development is a federally assisted building in danger of having the mortgage assigned to HUD or RD, or in danger of creating a claim on a federal mortgage insurance fund (Application, p. 22) ❖ 3 points if the development involves preservation of existing affordable housing with an existing project-based rental assistance agreement (App, p. 22) ❖ 1 point for developments located in a community with active housing activities (new construction, purchase/rehab/resale, demolition, lot preparation, etc)? (App, p. 31)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] NIFA will accept CRANE Applications on an ongoing basis throughout the year. The CRANE Program is designed to target specific long-term, interrelated and coordinated job creation/enhancement, economic growth, and joint housing and community development strategies (see notes) (p. 18) ❖ 1 point if the proposed development is part of a neighborhood redevelopment plan or leverages public and private dollars to support locally-driven strategies that address struggling neighborhoods with distressed public or HUD-assisted housing through a comprehensive approach to neighborhood transformation (Application, p. 11)

	<ul style="list-style-type: none"> ❖ [Tiebreaker] After evaluating and scoring all applications received for each application acceptance round, NIFA/NDED will consider which development is located in a QCT that contributes to a concerted community revitalized plan if there is a tie between applications (App, p. 46)
B1. Local participation in site selection is limited to statutory minimum. ⁶⁰	<ul style="list-style-type: none"> ❖ Notification of public official is part of the application, but no points or threshold is allocated toward it (Application, p. 18)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ Applications must include an affirmative plan (App, p. 35)
C2. Scoring that incentivizes affirmative marketing.	No
C3. Scoring that incentivizes language access and marketing to non-English speakers.	No
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ 1 point if the development owner has entered into an agreement with the local Public Housing Authority (PHA) to consider households from the PHA waiting list as potential tenants (App, p. 24) ❖ 2 points for partnering with a PHA that has committed to providing new project-based rental assistance. The project-based rental assistance commitment from the Housing Authority must be for at least 25% or more of the total units in the development and the length of the commitment must be for a minimum of 15 years (App, p. 28)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No
F1. Incentives for larger family units.	See F2
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 1 point if the development includes units that target low-income families with children, with at least 10% of the LIHTC units being four-bedroom units or larger (App, p. 23)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ 3 points will be awarded if at least 10% of the total units in the development have a

⁶⁰ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>targeted gross rent level that is affordable to households whose income level is at or below 40% of the applicable AMI (App, p. 43)</p> <ul style="list-style-type: none"> ❖ 2 points will be awarded if at least 40% of the total units in the development have a targeted gross rent level that is affordable to households whose income level is at or below 50% of the applicable AMI (App, p. 43) ❖ [Tiebreaker] After evaluating and scoring all applications received for each application acceptance round, NIFA/NDED will consider which development serves the lowest income tenants if there is a tie between applications (App, p. 46)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2
O2. Scoring that promotes units for special needs populations.	See A4b (CRANE Program) and Notes
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 2 points for developments that offer qualified tenants a lease-purchase homeownership option (Application, p. 21)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Conditional Reservation] Applicants determined to receive a reservation of LIHTC and AHTC in a Competitive Round or in the CRANE Program will be notified in writing and will receive a Conditional Reservation of LIHTC and AHTC subject to: A Fair Housing Certification, signed by the development’s architect evidencing that, when constructed in accordance with the plans and specifications, the development will be in compliance with the design and construction requirements set forth in the Fair Housing Act and Americans with Disabilities Act (p. 25)

	<ul style="list-style-type: none"> ❖ Page 36 of the QAP lists design and construction requirements of the Fair Housing Act: Appendix B – Fair Housing Act Accessibility Certification (p. 36-38) ❖ Applications must certify that they are in compliance with Fair Housing and Section 504 (App, p. 36)
Change since 2015?	A2; A4b; A5; A6; B1; D1; G1; O1/O2

QAP (2022/2023): [https://www.nifa-org-files.s3.amazonaws.com/2493-21807867-0 - Combined 2022-2023 QAP Documents Correct one \(1\).pdf?versionId=s07xHIQzf_5UUI6AcvKp78dd5J9Kuj](https://www.nifa-org-files.s3.amazonaws.com/2493-21807867-0 - Combined 2022-2023 QAP Documents Correct one (1).pdf?versionId=s07xHIQzf_5UUI6AcvKp78dd5J9Kuj)

- 9% QAP begins on page 143 of PDF, Scoring Criteria is on page 147 of PDF, Application on page 224

TOTAL POINTS POSSIBLE: 88. NIFA reserves the right to not allocate LIHTC and AHTC for any development, regardless of ranking/scoring, if NIFA determines in its sole discretion that the development does not further the purpose and goals of LIHTC and AHTC program

NOTES:

- Priorities listed on page 5 of 9% QAP
- CRANE Program Application:
 - The focus and primary purpose of CRANE Program is to target specific long-term, interrelated and coordinated job creation/enhancement, economic growth, and joint housing and community development strategies
 - For both 2022 and 2023 NIFA will **set-aside up to 33%** (approximately \$1.6 million) of Nebraska’s annual 9% LIHTC authority to be allocated pursuant to the CRANE Program (set-aside can be increased as set forth in Section 9(d)).
 - To participate in the CRANE Program, for-profit or non-profit entities (“Eligible Applicant”) must join together with cities, communities and neighborhoods and collectively demonstrate that through a public process they have assessed the needs of their particular community with respect to economic development, community resource and housing development, and have proposed specific solutions to address those needs (the “Plan”).
 - Proposals submitted under the CRANE Program must demonstrate how current and potential employers and institutions (schools, hospitals, municipal service providers) located in the community will be involved in any proposed solutions. Such proposals shall also demonstrate the development of businesses and creation of jobs and the impact on the development of affordable housing in the area.
 - Eligible Applicants may apply for LIHTC and AHTC through the CRANE Program for developments that provide substantial benefit (as determined in NIFA’s sole discretion) in one or more of the following areas:
 - Housing provided to one or more of the following populations: serious/chronic mental illness, physical or developmental disabilities, substance abuse issues, or homelessness. At least 30% of the units must serve one or more of these populations;

- Native American Housing (housing that is developed on an Indian Reservation or on tribal land, either held in trust or fee simple, or housing developed and operated by an Indian Tribe that is recognized by Nebraska or the federal government); or
- Adaptive Reuse of a non-residential building to create affordable housing; or
- Housing developments in response to settlement agreements or consent decrees relating to housing deficiencies, housing discrimination or other housing issues i.e. Choice Neighborhood program; or
- Housing developments, located or to be located, in a county that has never had an occupied LIHTC development; or
- Reentry Housing targeting individuals released from a correctional institution.
- Housing developments, located or to be located, in a community that at any time during the prior three (3) years has been designated as a natural disaster area pursuant to a Presidential Disaster Declaration, and with respect to which NIFA has determined (using available information, including information from partner organizations (e.g. FEMA)) that there is a significant loss of housing as a result of such natural disaster.

CHANGES SINCE 2015

- A2 – provision now allocated points to mixed-income developments
- A4b – QAP now explicitly lays out points to encourage development in high opportunity areas
 - Language of “High Opportunity Areas” is used explicitly and NIFA provides indexes for determining the rating of opportunity in census tracts
- A5 – although no mention of quality, schools are included as an index in opportunity areas
- A6 – Provision now allocates points toward the neighborhood redevelopment and/or transformation
- B1 – QAP mentions the inclusion of notification of a public official government
- D1 – more points now allocated toward PHA involvement
- G1 – Points now allocated to units that serve the lowest income levels (outside of the CRANE program). Serving the lowest income tenants is also a tiebreaker provision
- O1/O2 – QAP is less explicit about serving tenants with special needs, but serving special needs populations is a component of the CRANE program

STATE: NEVADA (QAP 2022)	Nevada Dept. of Business & Industry Housing Division (NHD)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ Proximity to Existing Tax Credit Projects: NHD will monitor the distribution of LIHTC projects across the state as well as in particular submarkets (p. 4). [weak but potentially related]
A2. Scoring that discourages racial and economic concentration.	❖ One of the identified application categories is mixed income residential projects (minimum 10% of units must be unrestricted, market rate) (p. 8). The project with the highest percentage of market rate units will receive 10 points; the project with

	the second highest percentage will receive 5 points (p. 19).
A3. Mandatory requirements for development in high-opportunity areas	❖ Site Suitability: NHD will evaluate sites on the basis of suitability and overall marketability (p. 4).
A4a. Scoring that encourages development in high-income areas.	30% basis boost may be authorized for projects located outside a CDBG-eligible Census Tract (p. 30). ❖ 30% basis boost may be authorized for projects located in High and moderate income statewide census tracts per the Federal Financial Institutions Examination Council https://www.ffiec.gov/census/ (p. 30).
A4b. Scoring that encourages development in high opportunity areas.	❖ 2 points for projects located within ¼ mile of at least three of the following: grocery, pharmacy, bank, school, day care (family projects), parks, community centers, medical facilities, library, place of worship, post office (p. 24). 1 point for projects located within ¼ mile of a designated pedestrian/bicycle path aside from sidewalks (p. 24).
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ⁶¹	❖ (-) 2 points to projects that include a PBRA contract for at least 25% of the units. 2 points to projects that include the acquisition/rehabilitation of a foreclosed, vacant, or abandoned building, or the reuse/conversion of an existing building. 5 points to preservation projects with a letter of support from the USDA-RD office. 2 points for projects that include the preservation of existing LIHTC units (p. 27). (-) 30% basis boost is authorized for projects located in a DDA or QCT (p. 30).
A7. Scoring or requirements that preference siting near mass transit.	❖ 1 point for projects in Clark and Washoe Counties located within ¼ mile of a local transit route or school bus stop (school bus stop for family projects only). Within ½ mile for other counties (p. 24).
A8. Focus on and operationalization of a neighborhood revitalization plan.	❖ 5 points if project is located in a QCT AND is covered by a State or local Concerted Community Revitalization Plan (p. 20).

⁶¹ 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.

B1. Local participation in site selection is limited to statutory minimum. ⁶²	❖ [Threshold Req.] Applicants must provide the Division evidence of delivery of and a copy of the letter notifying the chief executive officer or equivalent of the local jurisdiction within which the project is located. The letter must indicate the jurisdiction may send any comments to the Applicant and the Division (p. 18).
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 in high-opportunity areas.	No.
F1. Incentives for larger family units.	See F1.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ One of the identified application categories is housing for individuals with children and families with children (90% of units must be one bedroom or more) (p. 8). 10 points to application with the highest average square footage within this category. 5 points to second highest (p. 18). [Also applies to F1]. ❖ 3 points if the development has a children’s pool that purifies and recycles water (Applies to Family Rental and Tenant Ownership projects only) (p. 21). ❖ [Threshold amenity] Projects serving families with 40+ units must have a playground (at least 500 sq. ft.) (p. 23).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Up to 6 points for rent targeting at lower rent income level percentage (<40%) (p. 27) ❖ 2 points for a signed letter agreeing to restrict rents/and incomes to not exceed the 50% limit for all LIHTC units (p. 27).
REPORTING REQUIREMENTS	

⁶² Evidence of the inverse: preferences or requirements for local participation should also be noted.

H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<p>See O2 (disabled pops covered under Special Needs).</p> <ul style="list-style-type: none"> ❖ 3 points for projects exceeding the 5% & 2% requirement by making 21% of units (15% mobility /6% A-V) adaptable/accessible (p. 22). ❖ 2 points for projects including grab bars at all bathtubs and showers in all apartments specified for handicapped use (p. 22).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ One of the identified application categories is housing for special needs populations. At least 20% of units must serve special needs populations (p. 8). Special Need Applications ranked on the following factors: (1) the number of months of experience will be weighted by 70%; (2) the number of housing units developed will be weighted by 30%. 10 points to the highest score and 5 points to second highest (p. 19). ❖ One of the identified application categories is senior housing (p. 8). 10 points to application with the highest average square footage within this category. 5 points to second highest (p. 18). ❖ NHD will award 1 point for providing a preference of a minimum of 10% of the total number of restricted and unrestricted units targeted for households in which at least one household member is a Veteran (p. 20). ❖ 30% basis boost may be authorized for projects for special needs populations (p. 30).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ One of the identified application categories is housing for eventual tenant ownership. For this category, all of the restricted rental units in the project must be made available for eventual ownership. Residential units must be single-family structures, consisting of 1-4 units, and/or townhomes. Project must make the units in the project available for purchase by the existing tenants upon the termination of the 15-year compliance period (p. 9).

O4. Provisions affirmatively furthering fair housing laws.	❖ [Threshold Req.] The project architect must certify the improvements will comply with Fair Housing Act accessibility standards (p. 12).
Change since 2015?	A2; B1; F1; F2; G1; O1; O2

QAP (2022): https://housing.nv.gov/Programs/LIT/QAP/Qualified_Allocation_Plan/

NOTES:

TOTAL POINTS POSSIBLE: 124.

NHD will fund the set-aside categories before making Geographic and General Pool Account allocations. Eligible applications that do not receive funding from the requested set-aside(s) will compete in the selected geographic category. Set asides include non-profit (10%), USDA Rural Development (10%), and additional LIHTCs (10%) (for projects that previously received credits and had unforeseeable increased construction costs and/or decreases in a funding source). Applications may be submitted for anyone of the following categories: projects for individuals, projects for individuals with children and families with children, senior housing (55+), housing for persons with special needs⁶³, mixed-income/mixed-use residential projects, housing for eventual tenant ownership, acquisition/rehabilitation projects, and new construction projects utilizing alternative materials/methods. Projects are ranked within each set-aside and geographic sub-account.

Geographic Account: After Set-Aside and Additional Funding awards, NHD will, according to relative populations, proportionately distribute LIHTCs to projects in each of the three geographic accounts: Clark County, Washoe County, and Other Nevada Counties.

Up to 8 points awarded based upon the level of additional resources, funding leveraged by Tax Credits or effective use of conventional financing. Eligible financing includes an arm’s length transfer of real estate to the Applicant/Co-Applicants for a nominal cost and funding sources limited to the local PHA, CDBG program funds, HUD 202 or 811, or USDA-RD 515, Federal Home Loan Bank Affordable Housing Program (AHP), Established local government housing development funds (i.e., HOME, LIHTF, or RDA), Bureau of Indian Affairs, 3rd Party (non-related) and non-mortgage funds or grants (p. 29). [Some of this could be interpreted as negative provisions for B1 and A6, depending on funding source and how it connects to local participation and subsidy layering respectively.]

CHANGES SINCE 2015:

A2: NHD added a point award for mixed income residential projects.

B1: QAP requires a letter notifying local jurisdiction of a project, whereas previously evaluated QAP required a letter of support from the local jurisdiction.

F1/F2: NHD added a point award for housing for individuals with children and families with children and a point award for amenities directed toward families with children.

⁶³ For this category, at least 20% of units must serve 1+ of identified special needs populations: persons with disabilities, permanent supportive housing for persons and families who are homeless, victims of domestic violence, persons released from incarceration, including persons paroled or on probation, and persons with drug, substance and/or alcohol abuse behavior (p. 8).

G1: QAP awards fewer points for lower-income targeting than previously evaluated QAP. Basis boost is no longer available for deep income targeting.

O1: Small points award for accessibility features in units.

O2: Basis boost is authorized for projects for special needs populations.

NEW HAMPSHIRE: (QAP 2023-2024)	New Hampshire Housing
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.	❖ 10 points for projects in cities and towns with no other previously approved affordable general occupancy housing (p. 15)
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.	<ul style="list-style-type: none"> ❖ New Hampshire Housing Opportunity Index (see notes): <ul style="list-style-type: none"> • 0-2 points for Education Opportunity • 0-2 points for Health Opportunity • 0-2 points for Prosperity Opportunity • 0-2 points for Housing Opportunity (p. 15) ❖ Community Development Component. Projects that fall into one of these three categories may score up to a maximum of 10 points: <ol style="list-style-type: none"> i. 10 points for projects located within a Community Center Area (CCA)(see notes) ii. 10 points for projects with a Walkscore of 40 or higher. Projects with public sewer and water or within ¼ mile of fixed route public transit may receive these points if the location of the proposed project or an immediately adjacent site receives a Walkscore of 36 or higher. Projects with public water and sewer and also located within ¼ mile of fixed route public transit may receive these

	<p>points with a Walkscore of 32 or higher</p> <p>iii. Smart Growth Components. Projects with the following components will be awarded points as follows for a maximum of 10 points:</p> <ul style="list-style-type: none"> a. 3 points for public water supply b. 3 points for public sewer c. 2 points for appropriate zoning without variance d. 2 points for municipally-maintained off-site sidewalks accessible from the site leading within ¼ mile to a CCA, fixed route public transportation, or to a grocery store (p. 17-18)
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ⁶⁴	<ul style="list-style-type: none"> ❖ The 130% basis boost will be applied to projects located in DDAs or QCTs (p.7) ❖ 1 point for projects noted in A4b that preserve and renovate existing housing (p. 18)
A7. Scoring or requirements that preference siting near mass transit.	No
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 3 points for projects that are in a QCT and the development of which contributes to a Concerted Community Revitalization Plan (p. 18)
B1. Local participation in site selection is limited to statutory minimum. ⁶⁵	<ul style="list-style-type: none"> ❖ Up to 20 points for projects which have a proposed and likely contribution of permanent sources of funds (p. 16)
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

⁶⁴ 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.

⁶⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.</p>	<ul style="list-style-type: none"> ❖ 3 points if the general partner/managing member/sponsor is a PHA or a NHHFA-approved CHDO. The general partner/managing member of the LIHTC project ownership entity must be the project sponsor or a wholly owned subsidiary of the project sponsor (p. 20)
<p>D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.</p>	<ul style="list-style-type: none"> ❖ [Threshold] Sponsors must commit in writing that, prior to occupancy, the sponsor will provide written notice to the local PHA with authority over the project location (or, where there is no local Public Housing Authority, the Section 8 Administrator for the State of New Hampshire) that the project will accept tenant-based vouchers (p. 11)
<p>F1. Incentives for larger family units.</p>	<p>No</p>
<p>F2. Incentives targeting families/families with children</p>	<p>No</p>
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ 5 points if greater than or equal to 20% of the total number of units are reserved for very low income (\leq 50% AMI) (p. 12) ❖ 5 points if greater than or equal to 10% but fewer than 100% of the total number of units are reserved for extremely low income (\leq 30% AMI) (p. 12). Units in this category will count towards the above (p. 12) ❖ 5 points if at least 25% of non-LIHTC units in the project, including market rate/unrestricted units, reserved for households earning more than 80% AMI but less than some other income targeting level such as 140% of AMI, or some combination of non-LIHTC unit types (p. 12) ❖ Project Grants and Assistance: <ul style="list-style-type: none"> • 15 points for projects which have a new rental assistance subsidy for at least 66% of the units for at least five years. PHA project-based vouchers are not eligible, unless the rent subsidies are a new allocation to the PHA specifically for the proposed

	<p>project. This point category is not available to existing projects requiring minimal rehabilitation; OR</p> <ul style="list-style-type: none"> • 10 points for projects which have a commitment of new rental assistance subsidy for at least 33% of the units for at least five years. Public Housing Authority project-based vouchers are not eligible unless the rent subsidies are a new allocation to the PHA specifically for the proposed project; OR • 5 points for projects which have a new commitment of project-based vouchers for 20% of the units for at least five years. Public Housing Authority project-based vouchers ARE eligible for points under this category (p. 15)
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REPORTING REQUIREMENTS	
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H1. Racial/demographic reporting requirements.	No
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OTHER CATEGORIES	
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O1. Scoring that promotes units for persons with disabilities.	<p>See O2 (b)</p> <ul style="list-style-type: none"> ❖ Developers committing units for individuals with disabilities and agreeing to enter into an 811 Project Rental Assistance contract upon construction completion: <ul style="list-style-type: none"> a. 5 points for projects committing 10%, or 2 units, whichever is greater, of the total units; OR b. 7 points for projects committing 25% of the total units (p. 14-15) ❖ 2 points for new construction projects that design and construct a minimum of 15% of the total units as fully accessible units (p. 21)
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O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Supportive Housing (an application can be scored points in only one section in this category) <ul style="list-style-type: none"> a. 25 points for general occupancy projects only serving homeless or Veterans: Each and every household must be homeless or at imminent risk of homelessness immediately prior to
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	<p>tenancy or include a veteran, have unstable housing, and be identified as needing services to maintain housing</p> <p>b. 20 points for both age-restricted and general occupancy projects: Greater than or equal to 10% up to 25% of all units are reserved for households that include a household member who has an intellectual or physical disability, severe mental illness (must also participate in the 811 program – general occupancy projects only), a veteran, or is homeless or at imminent risk of homelessness immediately prior to tenancy and be identified as needing services to maintain housing (p. 13)</p>
<p>O3. Scoring to promote home ownership.</p>	<p>❖ [Threshold] Projects <i>may</i> be structured to transfer to tenant ownership after the initial 15-year compliance period, through the Right of First Refusal provided for in Section 42(i)(7) of the Internal Revenue Code. Projects structured to allow for eventual tenant ownership must submit a Tenant to Homeowner conversion plan with their application, which is subject to review and approval by NHHFA. The conversion plan must include, at a minimum:</p> <ul style="list-style-type: none"> • Tenant protections, including protections for tenants who do not wish to purchase their homes • Tenant training, counseling, and support services • Financial plan addressing the limited partner’s exit, disposition of mortgage debt (including subordinate loans), and plan for project reserve accounts • Plan to assess and address physical needs for each unit prior to transfer of title to tenant • Estimate of year fifteen purchase price. Total monthly housing costs after taking title must be less than or

	<p>equal to their total monthly housing costs before taking title</p> <ul style="list-style-type: none"> ❖ If the Tenant to Homeowner conversion plan submitted with an application is not acceptable to NHHFA, NHHFA will give the Sponsor an opportunity to revise the plan so that it can be approved by NHHFA, or <i>to revise the project so as to remove provisions for eventual tenant ownership</i> (p, 11) ❖ [Tiebreaker] The project intended for eventual tenant ownership is favored (p. 22)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Threshold] All projects receiving LIHTC allocations must comply with all relevant NHHFA, state, and federal regulations, including the Fair Housing Act (p. 26)
Change since 2015?	A1; A4b; A6; A8; D1; D2; F1/F2; O1; O3

QAP 2023-2024: https://www.nhhfa.org/wp-content/uploads/2022/03/2023-2024-Qualified-Allocation-Plan_Final.pdf

TOTAL POINTS POSSIBLE: A general occupancy project must receive a minimum of 100 points, an age-restricted project must receive a minimum of 95 points, and a preservation/recapitalization project must receive a minimum of 110 points with at least eight of those 110 points awarded pursuant to the Preservation Scoring Matrix (Appendix L).

NOTES:

- New Hampshire Housing Opportunity Index: <https://www.nhhfa.org/new-hampshire-housing-opportunity-index/>
- Community Development Area (CCA): CCAs are areas in each town or city in NH that prioritize key characteristics, including high density and mixed-use (residential/commercial/public use) developments, core main street areas, and historic areas. Cities/towns may have more than one CCA if more than one area in a municipality meets the above criteria. Contact NHHFA to request documentation to find out if your project is located in a CCA

CHANGES SINCE 2015:

- A1: QAP no longer includes tenant anti-displacement and relocation threshold requirement
- A4b: QAP now includes an Opportunity Index and a Community Development Component that allocates points based on the inclusion of community-oriented aspects in a development
- A6: QAP no longer includes a threshold requirement that allows NH Housing to deny projects proposed to be in infeasible or inappropriate locations
- A8: QAP no longer allocated points for projects in downtown, developed areas, or adaptive reuse of buildings. QAP now only offers points for projects in a QCT that contribute to neighborhood revitalization
- D2: It is now a threshold requirement that projects commit to Section 8 voucher access

- F1/F2: QAP no longer includes provisions incentivizing family housing
- O1: QAP now allocates points for accessible construction
- O3: QAP now includes provisions promoting homeownership

STATE: NEW JERSEY (2019-20)	New Jersey Housing and Mortgage Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	<ul style="list-style-type: none"> ❖ [Geographic restriction though not specific to racial/economic concentration] For all funding cycles except Supportive Housing, NJHMFA shall fund no more than two projects/year from the same municipality with a population of <100,000 and no more than 3 projects/year from the same municipality with a population >100,000 (p. 18) ❖ Non-preservation projects located in census tracts wherein 30% or more of the existing housing units are low-income housing tax credit units shall not be eligible for funding unless the following criteria are met: <ul style="list-style-type: none"> i. The project must be a redevelopment project; ii. The project does not add more low-income units to the census tract; iii. The project plan includes relocation options to higher opportunity areas and mobility counseling assistance for existing residents; and iv. The application includes a municipal resolution that references this paragraph and supports the allocation of housing tax credits for the development (p. 42).
A2. Scoring that discourages racial and economic concentration.	<ul style="list-style-type: none"> ❖ Mixed Income set-aside: The first reservation of credits from the Family Cycle shall be awarded to one project that contains up to 55% affordable units and is located outside of a Targeted Urban Municipality (TUM) [see notes] (p. 17-18). ❖ One bonus point if at least 20% of units are set aside for unrestricted, market rate tenants (p. 55).
A3. Mandatory requirements for development in high-opportunity areas	No.

<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ [Family Cycle] Projects not located within a Targeted Urban Municipality (TUM) which extend their compliance period for an additional 15 years shall receive 20 points. This only applies if project has not applied for points associated with building in a TUM (see A6) or for points to convert units to tenant ownership (see O3) (p. 44).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Projects located within a ready to grow area [means an area that has the capacity for growth and has received recognition from the State of this capacity (p. 10)] shall be awarded two points (p. 46) ❖ Projects located within ½ mile of a positive land use shall be awarded two points. Multiple points shall not be awarded for proximity to multiple positive land uses of the same category (48-49)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ A (non-senior) project located within one-half mile of an elementary school shall be awarded one point (p. 49) ❖ A (Family or SH) project that is fully located within a school district wherein 40% or more of the students are either meeting expectations or exceeding expectations on the PARCC assessment in both math and language arts shall receive 3 points (p. 52).
<p>A6. Scoring that discourages development in distressed neighborhoods.⁶⁶</p>	<ul style="list-style-type: none"> ❖ (-) Preservation set-aside: The second reservation of credits from the Family Cycle and the first reservation of credits from the Senior Cycle shall be given to the highest-ranking eligible application from a preservation set-aside project (an existing housing project that is at least 50 percent occupied and is at risk of losing its affordability controls or at risk of losing its level of affordability) (p. 18). [Pertains to existing subsidies so could contribute to development in distressed areas.]

⁶⁶ 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.

	<ul style="list-style-type: none"> ❖ [Family Cycle] (-) 15 points for projects located in a TUM. This only applies if project has not applied for points associated with an extended compliance period in a non-TUM (see A4a) or for points to convert units to tenant ownership (see O3) (p. 44). ❖ 3 points deducted from projects located with 1 mile of any of the following negative land uses: land fill; garbage dump; trash incinerator; nuclear power plant; oil/chemical refinery; unremediated toxic waste site; jail/prison; and wastewater treatment facility; tax credits awards in the same census tract in the same cycle (p. 50-51)
A7. Scoring or requirements that preference siting near mass transit.	❖ A project located within ½ mile of public transportation shall receive 2 points (p. 52)
A8. Focus on and operationalization of a neighborhood revitalization plan.	No.
B1. Local participation in site selection is limited to statutory minimum. ⁶⁷	❖ (-) Applicants may receive up to 5 points for municipal support (tax abatement) (p. 45).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ Supportive housing projects⁶⁸ or projects applying to any cycle that contain supportive housing units shall submit the following items: <ul style="list-style-type: none"> i. A supportive housing population needs analysis; ii. A supportive housing marketing plan. The plan must identify the organizations that will be used for referrals and provide evidence, such as a letter of support, attesting that such organizations have experience serving the target population and can be a source for referrals...(p. 40-41)

⁶⁷ Evidence of the inverse: preferences or requirements for local participation should also be noted.

⁶⁸ "Supportive housing project" means a project which shall rent a minimum of 25.00 percent of the total project units to individuals with special needs. At a minimum, a supportive housing project must have a social service coordinator and a social services plan that addresses the needs of the identified special needs population. Special needs populations defined as individuals with mental illness, physical/developmental disabilities, HIV/AIDS, domestic violence victims, ex-offenders and youth offenders, youth aging out of foster care, runaway and homeless youth, homeless persons, disabled and homeless veterans, persons in treatment for substance abuse, and persons in other emerging groups as identified by state agencies (p. 15, 6). [Broad definition.]

	<ul style="list-style-type: none"> ❖ NJHMFA encourages all owners/developers to affirmatively market their projects. For projects over 25 units, applicants shall submit an Affirmative Fair Housing Marketing Plan, which, in short, documents how the project will be marketed to those people who are least likely to apply. For instance, if the proposed development is located in an area predominantly populated by Caucasians, outreach should be directed to non-Caucasians. Conversely, if the population is predominately African-American, outreach should be directed to non-African-American groups. At the time the units are placed in service, the owner/developer and rental agent shall certify that the project was affirmatively marketed (p. 41).
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.	<ul style="list-style-type: none"> ❖ A project shall receive 2 points if the project utilizes public housing waiting lists (p. 45).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ The compliance monitoring plan must require that the owner cannot refuse to lease a unit in the project to an applicant because the applicant holds a voucher and owner must certify that the owner has not refused to lease a unit to an applicant based solely on their status as a holder of a Section 8 voucher (p. 70).
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ [Family Cycle] [Final Cycle] Unless market area demographics and/or financial feasibility demonstrate otherwise, all non-age-restricted projects (except minimum rehabilitation, preservation and historic rehabilitation projects) must adhere to the following minimum bedroom distributions: the combined number of efficiency and one-bedroom tax credit units shall be no greater than 20% of the tax credit units; at least 30% of the tax credit units shall be two-bedroom units; and at least 20% of the tax credit units shall be three- bedroom units (p. 17, 21) ❖ [Family Cycle] Low-density buildings where at least 25% of the tax credit units are large-

	family units shall be eligible for 5 points (p. 45)
F2. Incentives targeting families/families with children	❖ NJHMFA will award 2 points for family projects that provide a playground (p. 47).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Projects that select the 20% at 50% Federal set aside or elect to restrict 10% of the tax credit units to households earning 30% or less of AMI for family size shall receive 8 points. If the 20% at 50% election is selected, all tax credit units shall be restricted to 50% of the AMI adjusted for family size (p. 55).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ As required by the Housing and Recovery Act of 2008, owners are required to submit, on an annual basis, data pertaining to the residents of LIHTC-funded units. Such data must include, but is not limited to, income, rental assistance, disability status, monthly rental payment, race, ethnicity, family composition, and age (p. 70).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ Projects that rent 5 units or 5% of the total project units, whichever is greater, to individuals with disabilities who are leaving institutions under the decision in <i>Olmstead</i> , or individuals with disabilities who are at risk of institutionalization shall receive 2 points (p. 55). See O2 as persons with disabilities included under NJHMFA's special needs population definition.
O2. Scoring that promotes units for special needs populations.	❖ Supportive Housing Cycle: 12.5% of all tax credits set aside for supportive housing for special needs populations. To apply for SH set-aside, must provide (in addition to other required documents), a SH needs assessment, a SH marketing plan [see also C1], evidence of the applicant's experience in provision of SH, funding sources and social services plan, supportive services agreement, evidence of the receipt of rental assistance or operating subsidy commitment(s) for special needs populations >30% of AMI and/or evidence that the supportive housing units are affordable to the target population (p. 20, 41).

	<ul style="list-style-type: none"> ❖ Projects that rent 5 units or 5% of the total project units, whichever is greater, to individuals or families who are homeless shall receive 3 points (p. 54).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ [Family Cycle] For single family and duplex housing which will convert to tenant ownership, 10 points shall be awarded. Such projects must convert to home ownership at the end of the compliance period. This only applies if project has not applied for points associated with an extended compliance period in a non-TUM (see A4a) or for building in a TUM (see A6) (p. 44).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Definitions] The familial status provisions of the Fair Housing Act prohibit discrimination against households with children under 18. This protection extends to pregnant women, foster families, legal guardians, and those in the process of obtaining guardianship of or of adopting minor children. The only exception to this prohibition against discrimination based on familial status is for property that qualifies under a Fair Housing Act exemption as “housing for older persons.” (p. 11) ❖ At its sole discretion, the Tax Credit Committee is authorized to award any one additional nine percent application from either the Family, Senior, or Supportive Housing cycle that would otherwise not rank high enough for funding. One of the criteria for eligibility for such an award is a project that affirmatively furthers the purposes and policies of the Fair Housing Act or contributes to a municipal fair share housing development plan (p. 23). ❖ The compliance monitoring plan must demonstrate that no finding of discrimination under the Fair Housing Act has occurred for the project. A finding of discrimination includes an adverse final decision. (p. 70)
Change since 2015?	A2; A3; A8;

QAP (2019-20): https://nj.gov/dca/hmfa/developers/docs/lihtc/qap/tc_qap_proposed_2019_2020.pdf

NOTES:

Four set-aside cycles identified in the QAP: 1) Family Cycle (non-age restricted developments)—not less than 50% of the total credits awarded, includes 2 set-asides (Mixed-Income (see **A2**) and preservation (see **A6**); 2) Senior Cycle—not less than 20% of all tax credits, includes a preservation set-aside (**A6**); 3) Supportive Housing Cycle—not less than 12.5% of all tax credits; 4) Final Cycle (p. 17-21). Each Cycle has the same point system except as noted.

Applications for preservation projects must include (among other things) 1) an agreement precluding the involuntary displacement of any existing residents (other than for good cause) and in the case of scattered-site projects, a copy of the relocation plan for over-income residents [**A1**] and 2) documentation of how rents will remain at or near existing levels [**G1**] (p. 8).

NJHMFA defines a redevelopment project as one that is fully located within a 'redevelopment area' or 'area in need of redevelopment' or a 'rehabilitation area' or 'area in need of rehabilitation' as defined at NJS 40A:12A-3; or within the boundary of an approved 'neighborhood revitalization plan' as defined at NJS 52:27D-491. No later than the application deadline, the redevelopment plan must be approved by the municipal governing body or the neighborhood revitalization must be approved by the Commissioner. The project must further the goals and objectives of the approved plan (p. 11).

The required application narrative must include an explanation of how (among other things) the project will impact the neighborhood (p. 28).

In its description of the proposed site, the required Market Study must include (among other things) information on proximity to retail and employment, detailed neighborhood and market area maps showing all significant nearby land uses, and a description of the proposed improvements (including unit mix, a commentary on the preliminary drawings including size and design, proposed project and unit amenities) (p. 28). Market Study must give a comprehensive and reasonable rationale for the suggested market area and may take into account political and natural boundaries, socioeconomic characteristics, and the areas from which nearby rental developments draw new tenants. The market area shall be evaluated on the basis of employment and income levels and trends, the presence of revitalization projects, the number of substandard units in the markets, and the number of cost-burdened households in the market. Interviews shall be conducted with area apartment managers to establish mobility patterns in the area (p. 28-29). Market Study must include an economic analysis that includes trends in resident employment/unemployment, area employment opportunities, and other economic conditions (p. 29). The impact of the project on existing housing inventory in the market area shall also be addressed (p. 30).

Project shall be underwritten to demonstrate project feasibility at a HH median income percentage that is 2.5% below the income designation selected. E.g., if the 50% AMI income designation is selected, those units shall be underwritten with rents affordable to tenants at or below 47.5% of the AMI adjusted for family size (p. 36). [Could fit with **G1** although isn't specific to the lowest-income tenants.]

Projects with market-rate units shall distribute the low- and moderate-income units among the different sized units to reflect the same percentage distribution as the number of different sized units bear to the total number of units. A greater percentage of the low and moderate income units may, however, be allocated to the larger units. Additionally, low- and moderate-income units shall be distributed throughout the project such that the tenants of such units will have equal access to, and enjoyment of, all common facilities of the project (p. 34). [Could fit with **G1** and **F1**].

“Targeted Urban Municipalities” means those urban municipalities ranked and designated by the following factors: Department of Community Affairs (DCA) Municipal Revitalization Index, housing density, population, and employment to housing ratio. NJHMFA shall publish annually a list of municipalities which are designated as TUMs (p. 16). [TUMs are distressed areas. Methodology for designating TUMs (https://nj.gov/dca/hmfa/developers/docs/lihtc/tax/tum_methodology.pdf) weighs MRI score (see below) heavily.]

“Municipal Revitalization Index” or “MRI” means the Index by which New Jersey’s municipalities are ranked according to eight separate indicators that measure diverse aspects of social, economic, physical, and fiscal conditions. Each municipality in the State receives a composite score and ranking, ranging from the most distressed (ranking number 1) to the least distressed (ranking number 565). The MRI is available at <https://www.nj.gov/dca/home/MuniRevitIndex.html>.

CHANGES SINCE 2015:

A2: NJHMFA added a Mixed-Income set aside within the Family Cycle and gives a bonus point for 20% units at market rate.

A3: 60% reservation for suburban and rural locations is no longer present in the QAP.

A8: NJHMFA removed the HOPE VI/Choice Neighborhoods set-aside.

NEW MEXICO QAP 2023	New Mexico Mortgage Finance Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ [Set-Aside] 20% of the Annual Credit Ceiling will be set aside for Underserved Populations (p. 21)
A2. Scoring that discourages racial and economic concentration.	<ul style="list-style-type: none"> ❖ [Priority] An equitable distribution of tax credits throughout all parts of the state where affordable housing is needed (p. 18) ❖ 2 points for projects that incorporate Market Rate Units equal to at least 15% of the total units (p. 30-31) ❖ 3 points if the project is to be located in a town, municipality, or Census Designated Place (CDP) with a population less than 16,000 and the Market Study supports the need for the project (p. 51) ❖ 3 points if the project is to be located in a town or municipality with no active LIHTC Projects (no LIHTC award made in the last 5 calendar years) and the Market Study supports the need for the project (p. 51)

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.	<ul style="list-style-type: none"> ❖ 2 points for projects located within a ½ walking distance to at least 3 facilities (at least one of these facilities must be a supermarket, farmers market or other food store with produce) (see table in notes) or a 1-mile walking distance to at least 6 facilities (at least two of these facilities must be in the Retail or Services categories below and one must be a supermarket, farmers market or other food store with produce). Rural / Tribal: A 2 miles walk distance to at least two facilities. At least one of these facilities must be a supermarket, farmers market or other food store with produce (p. 26)
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ⁶⁹	<ul style="list-style-type: none"> ❖ Projects located in a HUD-designated QCT or DDA are eligible for a 30% basis boost ❖ 10 points for: <ul style="list-style-type: none"> • Previously subsidized existing projects that are currently restricted but for which use restrictions are to expire on or before December 31 2027; or • Existing projects that are currently subsidized and eligible for prepayment and termination of their use agreement or LIHTC projects that are eligible to make a Qualified Contract Request; or • Existing projects that are at imminent risk of conversion to market rate; or • Projects currently without federal rental assistance that will have a new federal rental assistance contract covering at least 75% of all Units (p. 28-29)

⁶⁹ 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.

	<ul style="list-style-type: none"> ❖ Up to 8 points for Projects that have an existing federal rental assistance contract covering at least 75% of all Units (p. 29) ❖ Up to 6 points for projects that have or will have a federal rental assistance contract covering at least 20% of all eligible units (p. 29) ❖ Up to 10 points will be awarded corresponding to the percentage of eligible TDC contributed as described in this Project Selection Criterion (p. 42) ❖ 5 points for projects that include the demolition of Blighted Buildings or the remediation and reuse of a Brownfield site (p. 47) ❖ 3 points for projects that involve newly constructed Units totaling 35 Units or less, and does not contain any rehabilitation or Adaptive reuse in Project scope and the Market Study supports need for the Project (p. 51)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 2 points for projects located within ¼ mile walk distance of a commuter bus or commuter rail stop. Public transportation must be established and provided on a fixed route with scheduled service (p. 27) OR ❖ 4 points for projects located within a ¼ mile walk distance of a commuter bus stop. Public transportation must be established and provided on a fixed route with frequent scheduled service (any series of 3+ single direction stops more frequent than every 1 hour, Monday-Friday) (p. 27)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Priority] Production of Products that are located in QCTs and which Projects contribute to the development of a Concerted Community Revitalization Plan (p. 18) ❖ 3 points if a Project is located in an area covered by a Concerted Community

	<p>Revitalization Plan and the development of the proposed project contributes to the Concerted Community Revitalization Plan by engaging in a housing activity promoted in the plan</p> <ul style="list-style-type: none"> • The project is eligible for an additional 2 points if it is located in a QCT (p. 45)
B1. Local participation in site selection is limited to statutory minimum. ⁷⁰	<ul style="list-style-type: none"> ❖ At least 1% of the Total Development Cost (TDC) must be made permanently available to the Project through a grant or other contribution by a private third-party entity or other federal funds or endowed by formal resolution of a state, Local Governmental entity or local tribal governmental entity or tribal council (p. 42)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [See O2] Applicants shall provide a narrative explaining how Units will be marketed and made available to Households with Special Needs Housing (p. 33)
C2. Scoring that incentivizes affirmative marketing.	<ul style="list-style-type: none"> ❖ 2 points for Projects providing a commitment to market the Units to households listed on public or Indian Housing agency waiting lists. A letter to the PHA or TDHE which serves the jurisdiction of the proposed site verifying this commitment is required to obtain points (p. 45)
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.	<ul style="list-style-type: none"> ❖ [Priority] Provision of affordable housing to households on public housing waiting lists (p. 17)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ As part of annual compliance monitoring, the Project Owner must show that they have not refused to lease a unit to an Applicant based exclusively on their status as a holder of a Section 8 voucher and the Project otherwise meets the provisions outlined in the extended low-income housing commitment (p. 88)
F1. Incentives for larger family units.	See F2

⁷⁰ Evidence of the inverse: preferences or requirements for local participation should also be noted.

<p>F2. Incentives targeting families/families with children</p>	<ul style="list-style-type: none"> ❖ Up to 8 points for projects in which 25% of all Units are reserved for Households with Children: <ul style="list-style-type: none"> • 10% of the total units must have 3+ bedrooms with at least 2 bathrooms (one must contain 4 pieces – bathtub, shower (or combo), sink and toilet and the other must contain 3 pieces (toilet, sink, bathtub/shower) • A further 15 % of the units must have two bedrooms with at least 2 bathrooms) (p. 39)
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ 10 points for Sustaining Affordability (see A6) (p. 28-29) ❖ Up to 8 points for Projects that have an existing federal rental assistance contract covering at least 75% of all Units (p. 29) ❖ Up to 6 points for projects that have or will have a federal rental assistance contract covering at least 20% of all eligible units (p. 29) ❖ An application may qualify for up to 16 points for rent and income restricting a Project for the Affordability period at the levels identified (see notes for levels) (p. 29-30) ❖ 3 points for projects not in the housing priority for Households with Special Housing Needs that targets extremely low-income residents, which includes income and rent restricting at least 5% of total Units in the Project to residents earning 30% or less of Area Median Income, for which no federal assistance is existing or anticipated (p. 51)
<p>REPORTING REQUIREMENTS</p>	
<p>H1. Racial/demographic reporting requirements.</p>	<p>No</p>
<p>OTHER CATEGORIES</p>	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<p>No</p>
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ Up to 8 points for projects serving Households with Special Housing Needs: 20% or more of total Units reserved for

	<p>Households with Special Housing Needs. At least 10% of the total Units must be rent restricted at 30% AMI or have permanent rental subsidy support with a project-based federal rental assistance contract that ensures residents do not pay rent in excess of 30% of their adjusted income (p. 31)</p> <ul style="list-style-type: none"> ❖ Up to 10 points for projects reserved for Senior Housing (p. 36) ❖ 3 points for projects in the Special Housing Needs housing priority category that restrict an additional 5% of the total units in the project to residents earning less than 30% or less of AMI, which Units may have permanent rental subsidy support with a project-based federal rental assistance contract that ensures residents do not pay rent in excess of 30% of their adjusted income (p. 51)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 2 points for projects in which all the Units are intended for eventual tenant ownership (p. 43)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Project owners must certify annually that there have been no findings of discrimination under the Fair Housing Act (p. 87)
Change since 2015?	A2; A4b; A6; A7; B1; C1; G1; O3

QAP 2023: https://housingnm.org/uploads/documents/Board_approved_2023_QAP_Clean_version.pdf

NOTES

Retail	Services	Civic and Community Facilities
Supermarket	Bank	Adult or senior care (licensed)
Other food store with produce	Gym, health club, exercise studio	Child care (licensed)
Farmers market	Hair care	Community or recreation center
Clothing store or department store selling clothes	Laundry, dry cleaner	Cultural arts facility (museum, performing arts)
Hardware store	Restaurant, cafe, diner	Educational facility (including K-12 school, university, adult education center, vocational school, community college)
Pharmacy		Entertainment venue (theater, sports)
Other retail		Government office that serves public on-site
		Place of worship
		Medical clinic or office that treats patients
		Police or fire station
		Post office
		Public library
		Public park

- Income Levels of Tenants
 - a. For any Project located within an Urban Area that proposes to use either the 20-50 or 40-60 election under §42(g)(1)(A) or §42(g)(1)(B) of the Code, respectively:
 - a. At least 40% of all low-income units at 50% or less of Area Median Income (16 points);
 - b. At least 30% of all low-income units at 50% or less of Area Median Income (14 points); or
 - c. At least 25% of all low-income units at 50% or less of Area Median Income (12 points).
 - b. For any Project not located within an Urban Area that proposes to use either the 20-50 or 40-60 election under §42(g)(1)(A) or §42(g)(1)(B) of the Code, respectively:
 - a. At least 25% of all low-income units at 50% or less of Area Median Income (16 points);
 - b. At least 15% of all low-income units at 50% or less of Area Median Income (14 points*); or
 - c. At least 10% of all low-income units at 50% or less of Area Median Income (12 points*). [*Projects choosing the 20-50 election are not eligible for these point categories]
 - c. For any Project located within an Urban Area that proposes to use the Average Income election under §42(g)(1)(C) of the Code:
 - a. The Average Income for the proposed Project will be 54% or lower (16 points);
 - b. The Average Income for the proposed Project will be 55% or lower (14 points); or
 - c. The Average Income for the proposed Project will be 56% or lower (12 points).
 - d. For any Project not located within an Urban Area that proposes to use the Average Income election under §42(g)(1)(C) of the Code:
 - a. The Average Income for the proposed Project will be 55% or lower (16 points);
 - b. The Average Income for the proposed Project will be 56% or lower (14 points); or
 - c. The Average Income for the proposed Project will be 57% or lower (12 points).

TOTAL POINTS POSSIBLE. **Minimum Score Required: 53.** Tax credit Reservations will not be awarded to 9% Projects achieving fewer than 53 points unless too few Projects score above this level and MFA, in its reasonable judgment, decides to reduce the minimum score. Projects scoring 53 or more points will be ranked according to their scores and in accordance with Section II.C. herein, subject to Allocation set-aside requirements

CHANGES SINCE 2015

- **A2:** QAP now includes provisions that discourage concentration by promoting mixed-income projects, geographic diversity, and new LIHTC project locations
- **A4b:** QAP is not more specific about defining proximity and which services qualify under this provision
- **A6:** Fewer points are now allocated for this provision and there is no longer allocation of points awarded for low-income set asides in counties with low AMI
 - This provision is more robust now allocated points for demolition of blighted buildings and promoting new construction
- **A7:** Provision is now more specific
- **B1:** Allocations no longer provided for local support letters
- **C1:** Affirmative marketing is specific to Special Needs Housing
- **G1:** More provisions promoting the priority of supporting low-income households
- **O3:** Fewer points now allocated under this provision

STATE: NEW YORK (QAP 2021)	New York State Division of Housing and Community Renewal (DHCR)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ [Threshold Requirement] The project does not involve the permanent involuntary displacement of existing tenants in order to qualify for credits (p. 12).
A2. Scoring that discourages racial and economic concentration.	<ul style="list-style-type: none"> ❖ Up to 5 points if the project promotes mixed-income development. See A8. (p. 15). ❖ Up to 4 points for mixed income development. Scored to the extent the project would serve HHs earning above 60% AMI (p. 18). ❖ Up to 5 points to projects in sites where there has been limited or no subsidized affordable housing production and an unmet demand for affordable housing in the past 10 years within the primary market area of the proposed location of the project (p. 19).

	<ul style="list-style-type: none"> ❖ (-) [State Housing Goals] Projects which will be implemented in a neighborhood located in a designated Empire State Poverty Reduction Initiative (ESPRI) locality and coordinated with the ESPRI activities underway. [ESPRI focuses on high poverty counties. Also relates to G1.] (RFP, p. 11).
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	<ul style="list-style-type: none"> ❖ See F2. Points for projects serving HH's with children includes consideration of whether the project is a housing opportunity project. Housing opportunity project definition includes location in an area of opportunity that meets or exceeds other measures of opportunity, including, but not limited to, the rate of poverty (p. 4, 17). Family projects located in census tracts with poverty rates below 10% (among other criteria) qualify as Housing Opportunity Projects (RFP, p. 10).
A4b. Scoring that encourages development in high opportunity areas.	<ul style="list-style-type: none"> ❖ See F2. Points for projects serving HH's with children includes consideration of whether the project is a housing opportunity project. Housing opportunity project definition includes location in an area of opportunity that meets or exceeds other measures of opportunity, including, but not limited to, the rate of poverty (p. 4, 17). ❖ Up to 5 points for projects classified as housing opportunity projects. Scored to the extent the project is in close proximity to public transportation (see also A7), is located in a community with a low incidence of crime, and/or is located in an area of opportunity as set forth in a request for proposals issued by the Division (p. 19). ❖ Housing Opportunity Projects are a set aside category. [Also applies to A4a, A5, A7, G1] (RFP, p. 13).
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ See F2. Points for projects serving HH's with children includes consideration of whether the project is a housing opportunity project. Housing opportunity project definition includes location in an area of opportunity linked to schools that meet or exceed minimum performance standards (p. 4, 17). Project qualifies as a Housing Opportunity Project if (among other criteria) the school district of the centroid of the census tract

	<p>scored above the state median in the average of 3rd through 8th grade English and Math standardized test scores from the past five years (RFP, p. 10).</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁷¹</p>	<ul style="list-style-type: none"> ❖ If HUD assistance is proposed for the project, DHCR will apply HUD subsidy review layering guidelines (p. 19). ❖ (-) [State Housing Goals] Projects advancing the “Public Housing Redevelopment Projects” Housing Goal address the needs of public housing units outside the City of New York and/or assist Public Housing Authorities in completing their restructuring plans, including projects participating in HUD’s Rental Assistance Demonstration Program [Also relates to G1] (RFP, p. 11). ❖ (-) [State Housing Goals] Projects advancing the “Preservation Projects” Housing Goal are currently under a regulatory agreement with a governmental agency to provide affordable housing to low-income individuals and/or families in order to preserve the housing as a viable community housing resource. Preference will be given to projects currently under a regulatory agreement with NYS Homes and Community Renewal (RFP, p. 11).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ See housing opportunity projects criteria around location near public transit (A4b). ❖ [State Housing Goals] Projects advancing the “Workforce Opportunity Project” Housing Goal must be located within a safe half-mile walk of frequently occurring public transportation (available 7 days a week on a repetitive, fixed-route schedule that is regular and continuing) (RFP, p. 11). ❖ Projects in the Supportive Housing set aside category are required to propose a project site in close proximity to public transportation, or include a transportation plan as a component of

⁷¹ 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>the comprehensive service plan to ensure access to necessary services (RFP, p. 14).</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Up to 10 points to projects that propose the use or reuse of existing buildings, in-fill new construction, and/or the demolition and replacement of buildings having a blighting impact on a community and the rehabilitation of which is impracticable and is part of a neighborhood specific revitalization plan or is complementary to an ongoing neighborhood specific planning and revitalization effort. Plans and efforts will be evaluated based on whether they: a) incorporate easy access to public transportation and/or promote walk-able communities in which essential goods and services are accessible within a short and safe walking distance (see also A4b and A7); b) are consistent with the historic character and density of the neighborhood; c) provide evidence of an ongoing, multi-faceted revitalization effort that addresses the homeownership, commercial, service, employment, recreational, educational, and cultural needs of the neighborhood; d) result from an open, public process in which neighborhood residents have had meaningful opportunities to contribute to its development; e) include a comprehensive neighborhood asset analysis that identifies the existing neighborhood strengths upon which the revitalization plan or effort is based, including, but not limited to, access to employment opportunities and proximity to viable commercial districts, stable neighborhoods, and cultural institutions; and, g) promotes mixed-income development (see also A2) AND the project clearly advances specific housing objectives of a Regional Economic Development Council strategic plan applicable to the area in which the project is located (p. 14-15). ❖ [State Housing Goals] Projects advancing the “Downtown Revitalization Initiative Project” Housing Goal propose residential and/or mixed use projects located in Downtown Revitalization Initiative plan areas that clearly advance the objectives of an approved Downtown

	Revitalization Initiative Strategic Investment Plan (RFP, p. 11).
B1. Local participation in site selection is limited to statutory minimum. ⁷²	❖ (-) Up to 11 points for financial leveraging in the form of permanent funding from sources other than the Division or HTFC or the donation of land and/or building(s). [Local contributions not mentioned explicitly but the wording is the same as that worded for local contributions for other states.] (p. 15).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ Awardees must comply with all HCR marketing guidelines and submit an Affirmative Fair Housing Marketing Plan acceptable to HCR’s Office of Fair Housing and Equal Opportunity (FEHO) (RFP, p. 15)
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.	❖ Scoring for affordability [see G1] includes evaluation of whether the applicant provides evidence that a public housing authority will make referrals to the proposed project (p. 17).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	❖ Up to 7 points to projects targeting individuals with children. Scored on the ratio of bedrooms to units in a project serving households with children and whether the project is a housing opportunity project* [A5] or advances a neighborhood specific revitalization plan and/or effort (p. 17).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Up to 8 points for project affordability. Scored on the percentage of units in the project which will be affordable and targeted to persons with the lowest incomes (e.g., 30%, 40%, or 50% of AMI) (p. 17). ❖ At least 10% of Housing Opportunity Project Units must be targeted to and serve HHs at or below 30% AMI (RFP, p. 10).

⁷² Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<ul style="list-style-type: none"> ❖ [State Housing Goals] Projects which will be implemented in a neighborhood located in a designated Empire State Poverty Reduction Initiative (ESPRI) locality and coordinated with the ESPRI activities underway. At least 15% of the project units must be targeted to and serve households at or below 30% of AMI. [Also a negative provision for A2] (RFP, p. 11). <p>See A6.</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ Up to 5 points for fully accessible and adapted, move-in ready units (p. 16-17). <p>See O2. Persons with special needs includes those with physical, intellectual/developmental disabilities.</p>
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 5 points to projects serving persons with special needs.** Scored if the project will give preference in tenant selection to persons with special needs, with priority being given to such persons who have served in the armed forces of the United States for a period of at least 6 months and have been thereafter discharged or released therefrom under conditions other than dishonorable, for at least 15 % of the LIHTC-assisted units and whether the persons with special needs will be served by supportive services as evidenced by a comprehensive service plan and an agreement or commitment in writing with an experienced service provider (p. 17). ❖ [State Housing Goals] Projects advancing the “Integrated Supportive Housing” Housing Goal provide permanent supportive housing to one or more special needs populations, and can show evidence of a service and operating subsidy from a governmental agency, such as an ESSHI award (RFP, p. 10). ❖ [State Housing Goals] Senior Housing: Projects that allow low-income seniors to live independently in the community. Preference will be given to projects that also meet at least one of the following State Housing Goals: 1) Community

	<p>Renewal and Revitalization, 2) Workforce Opportunity, 3) Economic Development, or 4) Downtown Revitalization Initiative (RFP, p. 11)</p> <ul style="list-style-type: none"> ❖ Empire State Supportive Housing Initiative (ESSHI) Projects, Supportive Housing Projects, and NYCHA Seniors First Projects are each set-aside categories. ESSHI and Supportive Housing projects must give preference in tenant selection to persons with special needs for at least 50% of the project units (RFP, p. 13). NYCHA Seniors First Projects must be 100% affordable (RFP, p. 15).
O3. Scoring to promote home ownership.	No.
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ The Division reserves the right to allocate credit in a manner which affirmatively advances fair housing (p. 22). ❖ As part of annual compliance monitoring, owner must show that all low-income units in the project are for use by the general public, including the requirement that no finding of discrimination under the Fair Housing Act (p. 31).
Change since 2015?	A4a, A4b, A5, A7, G1; A6; A8; B1; C1; D1; O2

QAP (2021): <https://hcr.ny.gov/system/files/documents/2021/05/qap-9-lihtc-part-2040.1-2040.13.pdf>

Fall 2022 HCR Multifamily Finance 9% LIHTC RFP:

<https://hcr.ny.gov/system/files/documents/2022/10/rev.10.3.2022.fall-2022-multifamily-finance-9-rfp.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 90

All applications must clearly advance at least one of the following State Housing Goals: 1) Community Renewal and Revitalization [**A8**]; 2) Integrated Supportive Housing [**O2**]; 3) Housing Opportunity Projects [**A4a, A4b, A5, A7, G1**]; 4) Workforce Opportunity [**A7**]; 5) Projects Advancing State Revitalization and Economic Development Initiatives, including Downtown Revitalization Initiative Projects [**A8**], Economic Development Projects, Brownfield Cleanup Program Projects, and Empire State Poverty Reduction Initiative (ESPRI) locality projects [**A2, G1**]; 6) Senior Housing [**O2**]; 7) Public Housing Redevelopment Projects [**A6, G1**]; 8) Preservation Projects [**A6**] (RFP, pp. 10-11).

HCR expects to set-aside a portion of the available 9% LIHTC for the following program priorities: ESSHI Projects and Supportive Housing Projects (up to \$3 million) [**O2**]; Public Housing Projects (up to \$2 million) [**A6, G1**]; Housing Opportunity Projects (up to \$3 million) [**A4a, A4b, A5, A7, G1**]; and NYCHA Seniors First Projects (up to \$15 million over several years) [**O2**] (RFP, p. 13).

* Housing opportunity projects shall mean family projects in an area of opportunity linked to schools that meet or exceed minimum performance standards and that meet or exceed other measures of opportunity, including, but not limited to, the rate of poverty, as may be set forth in a request for proposals (p. 4).

** Persons with special needs shall mean: persons living with HIV/AIDS; persons with a substance use disorder; persons with serious mental illness; homeless persons and families; persons with physical disabilities; persons who are survivors of domestic violence; persons with intellectual/developmental disabilities; frail elderly persons; or any other population so designated by the Division (p. 5).

CHANGES SINCE 2015:

RFP contains details on scoring referenced in the QAP and more specific provisions than the QAP. Many changes in New York’s ranking reflect evaluation of the RFP in addition to the QAP.

A4a, A4b, A5, A7, G1: Housing Opportunity Projects are a set aside category in the RFP. QAP does not reference set asides.

A6: “Public Housing Redevelopment Projects” and “Preservation Projects” are State Housing Goals emphasized in the RFP.

A8: Point award for neighborhood revitalization plan was increased from 5 to 10, so ranking increased from moderate/weak positive to strong positive.

B1: Point award for financial leveraging from other sources (potentially including local/municipal government) increased from 7 points to 11, so ranking decreased from moderate/weak negative to strong negative.

C1: RFP contains a requirement that all awardees submit an Affirmative Housing Marketing Plan.

D1: QAP no longer contains points award for projects with a marketing plan/public assistance. However, points for affordability includes referral from PHA provision.

O2: Empire State Supportive Housing Initiative (ESSHI) Projects, Supportive Housing Projects, and NYCHA Seniors First Projects are set aside categories in the RFP. QAP does not reference set asides.

NORTH CAROLINA: (QAP 2023)	North Carolina Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>❖ [Set-Aside] The Agency will award tax credits remaining after the rehabilitation set-aside to new construction projects, starting with those earning the highest scoring totals within each of the following four geographic set-asides and continuing in descending score order through the last project that can be fully funded: <i>West 16%, Central 23%; Metro 38%; East 23%</i> (p. 5)</p>

	<ul style="list-style-type: none"> ❖ (Rehabilitation and East, Central, and West Regions) No county will be awarded more than 1 project under the rehabilitation set-aside. No county will be awarded more than 1 project under the new construction set-aside (p. 8) ❖ New construction 9% tax credits may not exceed the following: <ul style="list-style-type: none"> • Metro Region: 120 units • Central, East, and West Regions: 84 units (p. 20) ❖ [General Requirement] Projects cannot be in areas of minority and low-income concentration (measured by comparing the percentage of minority and low-income households in the sites census tract with the community overall). The Agency may make an exception for projects in economically distressed areas which have community revitalization plans with public funds committed to support the effort (p. 27)
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 10 points will be subtracted from any full application that includes market-rate units. This penalty will not apply where: <ul style="list-style-type: none"> • The rents for all market rate units are at least 5% higher than the maximum allowed for a unit at 80% AMI and the market study indicates that such rents are feasible • There is a commitment for a grant or no-payment financing equal to at least the amount of foregone federal tax credit equity (p. 20) ❖ [Tiebreaker 1] the county with the highest cost burden low-income renters per 9 tax credit unit funded over the last 5 years (p. 22)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ The Agency can boost the eligible basis of new construction projects committing to

	<p>the targeting in Section IV(B)(2) or that are located in an Opportunity Zone by up to 10% (p. 8)</p> <ul style="list-style-type: none"> ❖ Maximum 26 points for proximity (measured by driving distance in miles) to Primary Amenities (see notes for point table) (p. 12) ❖ 3 points if the project would be visible to potential tenants using normal travel patterns and is within 500 ft of a building that is currently in use for residential, commercial, educational, or governmental purposes (p. 15) ❖ 3 points if traffic control allows for safe access to the site; for example, limited sight distance (blind curve) or having to cross three or more lanes of traffic going the same direction when exiting the site would not receive points (p. 15)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ See A4b (no mention of school quality)
<p>A6. Scoring that discourages development in distressed neighborhoods.⁷³</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] The Agency will award up to 10% of tax credits available after forward commitments to projects proposing rehabilitation of existing housing (p. 5) ❖ [Set-Aside] If necessary, the Agency will adjust the awards under the Plan to ensure the overall allocation results in awards for 2 Redevelopment Projects (see notes for qualifications) (p. 5) ❖ [Site Evaluation] Good: 10 points if structures within a ½ mile are well maintained or the site qualifies as a Redevelopment Project (p. 11) ❖ [Site Evaluation] Fair: 5 points if structures within ½ mile are not well maintained and there are visible signs of deterioration (p. 11)

⁷³ 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.

	<ul style="list-style-type: none"> ❖ 3 points if there is no Incompatible Use, which includes the following activities, conditions, or uses within the distance ranges specified: <ul style="list-style-type: none"> • ½ Mile: Airports; chemical or hazardous materials storage/disposal; industrial or agricultural activities with environmental concerns; commercial or junk salvage yards; landfills currently in operation; sources of excessive noise; wastewater treatment facilities • 500 ft: adult entertainment establishment; distribution facility; factory or similar operation; jail or prison; large swamp • 250 ft: electrical utility substation, whether active or not; frequently used railroad tracks (not to include passenger light rail); high traffic corridor; power transmission lines and tower (p. 14-15) ❖ 3 points if there are no negative features, design challenges, physical barriers, or other unusual and problematic circumstances that would impede project construction (p. 15) ❖ Up to 3 points will be deducted from a site deemed to be unsuitable for housing. This determination recognizes a site may meet all site evaluation scoring criteria but not be suitable for housing regardless of having required zoning or local government support (p. 15) ❖ [Rehabilitation Projects] The Agency will give the highest priority to applications proposing to rehabilitate the most distressed housing with a tax credit allocation, particularly buildings with accessibility or life, health, and safety concerns (p. 24)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No</p>

<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] The Agency will award 1 new construction project not to exceed \$1 million which contains Choice Neighborhood Implementation (CNI) funds (see notes) as determined by the Agency (p. 7) ❖ Applications will have priority to the extent that the rehabilitation improvements are a part of a community revitalization plan or will benefit the surrounding community. However, projects in severely distressed areas will have a reduced likelihood of being awarded tax credits (p. 25) ❖ See A1 (The Agency may make an exception for projects in economically distressed areas which have community revitalization plans with public funds committed to support the effort (p. 27))
<p>B1. Local participation in site selection is limited to statutory minimum.⁷⁴</p>	<p>No</p>
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ [See O2] Owners must submit an Affirmative Fair Housing Marketing Plan
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ Marketing Requirements – All projects, including “standalone” projects, are subject to HPD’s marketing requirements including the selection of initial tenants through an HPD supervised lottery (p. 16).
<p>C3. Scoring that incentives language access and marketing to non-English speakers.</p>	<p>No</p>
<p>D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.</p>	<p>No</p>
<p>D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.</p>	<p>No</p>
<p>F1. Incentives for larger family units.</p>	<p>See F2</p>
<p>F2. Incentives targeting families/families with children</p>	<ul style="list-style-type: none"> ❖ [Tiebreaker 3] Projects that can serve tenant populations with children. Project will qualify for this designation if at least 35 of the units are 3 or 4 bedrooms. This tiebreaker will only apply where the

⁷⁴ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>market study shows a clear demand for this population (p. 22)</p>
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ Maximum 2 points: <ul style="list-style-type: none"> (a) If the project is in a High Income county: <ul style="list-style-type: none"> a. 2 points will be awarded if at least 25% of qualified low-income units will be affordable to and occupied by households with incomes at or below 30% AMI b. 1 point if at least 15% of qualified low-income units will be affordable to and occupied by households at or below 30% AMI (b) If the project is in a Moderate Income county: <ul style="list-style-type: none"> a. 2 points will be awarded if at least 25% of qualified low-income units will be affordable to and occupied by households with incomes at or below 40% AMI b. 1 point if at least 15% of qualified low-income units will be affordable to and occupied by households at or below 40% AMI (c) If the project is in a Low Income county: <ul style="list-style-type: none"> a. 2 points will be awarded if at least 25% of qualified low-income units will be affordable to and occupied by households with incomes at or below 50% AMI b. 1 point if at least 15% of qualified low-income units will be affordable to and occupied by households at or below 50% AMI (p. 16) ❖ All new construction projects must have at least 24 qualified low-income units (p. 20)

	❖ [Tiebreaker 2] The project with the lowest average income targeting (p. 22)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ 5% of all units in new construction must meet the accessibility standards as defined in Appendix B. These units are in addition to mobility impaired units required by federal and state law (p. 21)
O2. Scoring that promotes units for special needs populations.	❖ All projects will be required to target 10% of the total units to persons with disabilities and persons who are homeless. Projects with federal project-based rental assistance must target at least 5 units regardless of size (p. 21)
O3. Scoring to promote home ownership.	❖ [Tiebreaker 4] Projects that are intended for eventual tenant ownership. Such projects must utilize a detached single family site plan and building design and have a plan describing how the project will convert to tenant ownership at the end of the 30-year compliance period (p. 22)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Consistent with the Fair Housing Act, the City implements a balanced approach to fair housing planning by taking meaningful actions to address disparities in housing needs, increase access to opportunity, foster inclusive communities, and facilitate integrated living patterns, in addition to combating discrimination, throughout New York City (p. 10). ❖ Owners must demonstrate adherence to all applicable federal, state, and local laws and ordinances, including the Code and Fair Housing Act (p. 32) ❖ [Compliance Monitoring] Owners must comply with Section 42 of the Code, IRS regulations, rulings, procedures, decisions and notices, state statutes, the Fair Housing Act, state laws, local codes, Agency loan documents, Appendix F, and any other legal requirements. The Agency

	may treat any failure to do so as a violation of the Plan (p. 32)
Change since 2015?	A1; A2; A4b; A6; A8; C1; C2; F1/F2; G1

QAP 2023:

https://www.nchfa.com/sites/default/files/page_attachments/QAP23%E2%80%94FinalQAP.pdf

NOTES:

- Redevelopment Projects: The following are required to qualify as a Redevelopment Project:
 - (i) The site currently contains or contained at least one structure used for commercial, residential, educational, or governmental purposes.
 - (ii) The application proposes adaptive re-use with historic rehabilitation credits and/or new construction
 - (iii) Any required demolition has been completed or is scheduled for completion in 2023 (not including the project buildings). For a Rental Assistance Demonstration (RAD) project under the U.S. Department of Housing and Urban Development (HUD), any required demolition must be scheduled to be completed by June 30, 2024.
 - (iv) A unit of local government initiated the project, evidenced by a Request for Proposal, Council minutes, or other documentation stipulating the project was originally envisioned by the local government, and has invested community development resources in the Half Mile area within the last ten years. A resolution will not suffice as evidence of local government initiation.
 - (v) As of the preliminary application deadline, a unit of local government formally adopted a plan to address the deterioration (if any) in the Half Mile area and approved one or more of the following for the project:
 - a. donation of at least one parcel of land,
 - b. waiver of impact, tap, or related fees normally charged,
 - c. commitment to lend/grant at least \$750,000 in the Metro region and \$250,000 in the East, Central or West of its housing development funds (net of any amount paid to the unit of government) as a source of permanent funding, or
 - d. is part of the RAD program under HUD. The Agency will require official documentation of each element of local government participation.
- Choice Neighborhoods Implementation Grants: Choice Neighborhoods Implementation Grants support those communities that have undergone a comprehensive local planning process and are ready to implement their “Transformation Plan” to redevelop the neighborhood (https://www.hud.gov/program_offices/public_indian_housing/programs/ph/cn/grants)
- Proximity to Primary Amenities:

Driving Distance in Miles

<i>Primary Amenities</i> <i>(maximum 26 points)</i>	≤ 1.5	≤ 2	≤ 2.5	≤ 3.5
Grocery	12 pts.	10 pts.	8 pts.	6 pts.
Shopping	7 pts.	6 pts.	5 pts.	4 pts.
Pharmacy	7 pts.	6 pts.	5 pts.	4 pts.
<i>Secondary Amenities</i> <i>(maximum 12 points)</i>	≤ 1.5	≤ 2	≤ 2.5	≤ 3.5
Other Primary Amenity	5 pts.	4 pts.	3 pts.	2 pts.
Service	3 pts.	2 pts.	1 pt.	0 pts.
Healthcare	3 pts.	2 pts.	1 pt.	0 pts.
Public Facility	3 pts.	2 pts.	1 pt.	0 pts.
Public School (Family)	3 pts.	2 pts.	1 pt.	0 pts.
Senior Center (Senior)	3 pts.	2 pts.	1 pt.	0 pts.
Retail	3 pts.	2 pts.	1 pt.	0 pts.

Driving Distance in Miles, Small Town*

<i>Primary Amenities</i> <i>(maximum 26 points)</i>	≤ 2.5	≤ 3	≤ 3.5	≤ 4.5
Grocery	12 pts.	10 pts.	8 pts.	6 pts.
Shopping	7 pts.	6 pts.	5 pts.	4 pts.
Pharmacy	7 pts.	6 pts.	5 pts.	4 pts.
<i>Secondary Amenities</i> <i>(maximum 12 points)</i>	≤ 2.5	≤ 3.	≤ 3.5	≤ 4.5
Other Primary Amenity	5 pts.	4 pts.	3 pts.	2 pts.
Service	3 pts.	2 pts.	1 pt.	0 pts.
Healthcare	3 pts.	2 pts.	1 pt.	0 pts.
Public Facility	3 pts.	2 pts.	1 pt.	0 pts.
Public School (Family)	3 pts.	2 pts.	1 pt.	0 pts.
Senior Center (Senior)	3 pts.	2 pts.	1 pt.	0 pts.
Retail	3 pts.	2 pts.	1 pt.	0 pts.

○

TOTAL POINTS POSSIBLE: An application must have a minimum

CHANGES SINCE 2015:

- **A1:** Provision now states that new construction projects will be awarded tac credits after rehabilitation projects, rather than awarded tax credits to one project in each set-aside
- **A2:** QAP now penalizes projects that include market-rate units and preferences (via tiebreaker) projects in counties with the highest cost-burdened renters funded over the last 5 years
- **A4b:** Provision now allocates points for visible projects and projects that provide for safe access to the site
- **A6:** Under site evaluation, the QAP preferences redevelopment projects and highly preferences rehabilitation projects. Additionally, less points are allocated for projects that avoid locations with incompatible uses
- **A8:** QAP now promotes projects that contain Choice Neighborhood Implementation funds and more greatly prioritizes projects that contribute to community revitalization plans
- **C1:** Projects with special needs housing must submit an affirmative marketing plan
- **C2:** Additional marketing requirements (no rating)
- **F1/F2:** Tiebreaker is now the 3rd tiebreaker and moved from F1 to F2
- **G1:** Fewer points now allocated to income targeting

NORTH DAKOTA: (QAP 2023)	North Dakota Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ No more than two projects will be approved in any one city during an application round (p. 12)
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.	No
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ⁷⁵	<p>❖ Ineligible Projects. Agency may reject an application for detrimental characteristics on or adjacent to the proposed project site unless a satisfactory remediation plan and budget are provided. Unsuitable sites include, but are not limited to, those that:</p> <ul style="list-style-type: none"> • Are within ½ mile of airports, industrial properties, pipelines, hazardous waste disposal or storage sites, sewage treatment plants, sanitary landfills, commercial junk or salvage yards, wastewater treatment facilities; or • Are within 500 feet of frequently used railroad tracks, electrical substation, power transmission lines or towers; • Have unsuitable slope, terrain, or physical barriers; • Are in a flood hazard area or wetlands (p. 4)

⁷⁵ 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.

	<ul style="list-style-type: none"> ❖ See A8 (The project is located on a site considered by Agency to be a previously developed property) ❖ Up to 10 points for state or federally-assisted non-LIHTC project, including those with expiring PBRA contract(s) for 50% or more of the units (within the next 36 months), which are at-risk of being lost from the state’s affordable housing inventory. Projects at risk of losing federal financial assistance because of default on their federal contract (p. 12)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ A project will receive 5 points if it meets one of the following conditions: <ul style="list-style-type: none"> • The project is located on a site considered by Agency to be a previously developed property • The project is in a QCT or city revitalization area established by resolution or other legal action by the city, and the development of the project contributes to a concerted community revitalization plan, including a Main Street Initiative plan. For purposes of this Plan, a concerted community revitalization plan is defined as a locally approved revitalization plan targeting specific existing areas or neighborhoods within the community for housing and economic development including the infill new construction or rehabilitation of housing. To qualify, the plan must be officially adopted by the local governing body, identify a specific time period, and apply only to a defined geographic area within the community. Local housing needs surveys, consolidated housing or economic development plans, short-term work plans, municipal zoning, or land use plans, or plans which are so broad as to encompass the entire community or so narrow as to encompass only the project’s subject

	<p>property do not qualify under this definition</p> <ul style="list-style-type: none"> • The project is entirely located within an Opportunity Zone, as defined in Code Section 1400Z-1 (p. 8)
B1. Local participation in site selection is limited to statutory minimum. ⁷⁶	<ul style="list-style-type: none"> ❖ If required under federal law, Agency will notify the jurisdiction where the project will be located after application submission. Agency may utilize any responsive comments in its decision-making process (p. 4) ❖ Up to 4 points for an applicant who provides signed, firm commitments for contributions or incentives from local government, private parties and/or philanthropic, religious, or charitable organizations which are NOT in the form of an interest-bearing loan and excluding commitment from entities with an identity of interest or those with a significant role in the project (p. 12)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [See O2] A tenant selection plan must be part of the support for tenants with special needs. The plan must describe in detail how individuals and/or families with special needs will be identified, affirmatively marketed to, and assisted in renting units at the project (p. 9)
C2. Scoring that incentivizes affirmative marketing.	No
C3. Scoring that incentivizes 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 in high-opportunity areas.	<ul style="list-style-type: none"> ❖ [Threshold] The application package must include a signed written commitment from the Applicant to inform the PHA of vacancies and to give priority to households on PHA waiting lists who apply for occupancy (p. 6)
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ 5 points if at least 20% of the low-income units are three-bedroom or larger (p. 11)

⁷⁶ Evidence of the inverse: preferences or requirements for local participation should also be noted.

F2. Incentives targeting families/families with children	See F1
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Up to 45 points for projects that serve the lowest income groups. Points will be awarded to projects with a minimum percentage of units having gross rents based upon 50% or less of AMI (see notes) (p. 8) ❖ Up to 10 points for state or federally-assisted non-LIHTC project, including those with expiring PBRA contract(s) for 50% or more of the units (within the next 36 months), which are at-risk of being lost from the state’s affordable housing inventory. Projects at risk of losing federal financial assistance because of default on their federal contract (p. 12)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Up to 10 points for projects which are committed to supporting tenants with special needs affecting their long-term housing stability and which create an environment that encourages and provides service coordination (p. 9)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 2 points if the project commits to set aside at least 5% of the tenant paid rent for homeownership. The owner shall enter into a binding contract with all tenants of LIHTC units, at the tenant’s initial occupancy, agreeing to a rebate of rent should the tenant household move directly into homeownership upon the tenant’s vacancy from the Project (p. 11) ❖ 1 point for tenant ownership. To be eligible to earn any points in this Scoring Category, all residential buildings in the Project must be individually surveyed, platted, and have separate physical addresses. Applications must include: a feasible plan that sets forth the process for transferring the property in whole;

	and the future purchase price; and homebuyer counseling efforts; and any other information requested by Agency (p. 11)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Compliance Monitoring] Properties containing facilities that are available to the general public must meet the ADA requirements and, if federal assistance is involved, must also comply with Section 504 of the Rehabilitation Act of 1973. The property must also comply with the Fair Housing Amendments Act of 1973 (p. 3) ❖ [Compliance Monitoring] QAP also states that all housing receiving LIHTC must be open to all persons of race, color national origin, religion, creed, sex, disability, or familial status (p. 3) ❖ [Threshold] The application package must include a completed and signed Fair Housing Act Accessibility Checklist (p. 6)
Change since 2015?	A1; A2; A6; F1; G1; O3

2023 QAP: <https://www.ndhfa.org/wp-content/uploads/2022/05/2023LIHTCQAP.pdf>

- 2024 DRAFT: <https://www.ndhfa.org/wp-content/uploads/2023/02/2024LIHTCDraftQAP.pdf> (final has not been released)

NOTES:

- **Basis Boost:** Non-acquisition eligible basis may be increased by 30% for projects meeting any of the following conditions:
 - 1. The project is entirely located within a HUD-designated DDA; or
 - 2. The project is entirely located within a HUD-designated QCT; or
 - 3. The project meets one of the following Agency designations:
 - The project is designed to primarily serve special needs populations, (i.e. homeless or those requiring permanent supportive services); or
 - The project targets 20% or more of the units at 30% of area median income or less; or
 - The project is within tribal reservations, including the Trenton Indian Service Area; or
 - The project entails new construction on in-fill lots with existing structures which either need to be demolished or require substantial environmental remediation; or
 - The project is entirely located within a rural area without sufficient soft financing to be financially feasible in low market-rent areas. Proposed rents,

including utility allowance, must be the lesser of Fair Market Rents or a minimum of 20% below LIHTC rent ceilings, either of which will be enforced through a land use restriction agreement (“LURA”). Developments with a project-based federal rent subsidy are not eligible; or

- The project is entirely located within an Opportunity Zone, as defined in Section 1400Z-1 of Code
- Serves Lowest Income Groups

Percent of Median Income on Which Gross Rent is Based					
50% AMI		40% AMI		30% or less AMI	
% of Total Units	Points	% of Total Units	Points	% of Total Units	Points
20%+	10	20%+	15	50%*	45
10%<20%	5	10%<20%	10	40%<50%	40
5%<10%	4	5%<10%	5	30%<40%	20
1%<5%	3	1%<5%	2	20%<30%	20
0%<1%	0	0%<1%	0	0%<10%	0

TOTAL POINTS POSSIBLE: Applications must receive a minimum of 55 points to be eligible for further consideration.

CHANGES SINCE 2015:

- **A1:** QAP now includes provision limiting developments to one project per city each application round
- **A2:** QAP no longer deducts points for geographic location based on the relationship of set-aside units selected within a unit compared to the total number of set aside units
- **A6:** QAP now specifies that projects may be deemed ineligible if the proposed site has undesirable characteristics
 - QAP also now promotes preservation of existing affordable housing
- **F1:** Fewer points now allocated for larger family units
- **G1:** More points allocated for serving the lowest-income groups and points allocated for converting at-risk units to affordable, LITHC, housing
- **O3:** Fewer points allocated to promote tenant homeownership

STATE: OHIO (QAP 2022)	Ohio Housing Finance Agency (OHFA)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ County Limits: OHFA will make no more than the following awards per county. Seven—Cuyahoga, Franklin; Five—Hamilton; Three—Summit, Montgomery, Lucas; Two—Butler, Stark, Lorain; One—all others (p. 33).
A2. Scoring that discourages racial and economic concentration.	[Strong +] Set-aside for Non-R/ECAP: For each of the three geographic Pools, OHFA will award at least one housing development outside of a HUD-defined Racially- or Ethnically-Concentrated Area of Poverty (R/ECAP) meeting all of the following criteria: <ul style="list-style-type: none"> • The proposed development is located in a High or Very High Opportunity or Moderate Opportunity Census tract (the latter must also

	<p>have a Community Change Index rating of Strong Growth or Growth).</p> <ul style="list-style-type: none"> • The proposed development will not be restricted to occupancy by persons 55 years of age or older. • No more than 35% of affordable units may be one-bedroom and/or efficiencies. • 5% of all affordable units must be three-bedroom or larger and also be affordable to those earning 60% AMI or less (p. 30). <p>❖ Strategic Initiatives allocation pool gives priority selection consideration to proposals meeting a quantifiable need and targeting policy and/or geographic areas left underserved through the competitive selection process, including but not limited to meeting OHFA’s CHDO set-aside obligation (p. 32).</p> <p>❖ Strategic Initiatives allocation pool gives priority selection consideration to proposals with a significant community and population impact, including ...mixed-use and mixed-income developments (p. 32).</p> <p>❖ First tiebreaker: Priority goes to the development located in the census tract that has received the fewest number of Competitive HTC awards over the past three years (p. 34).</p> <p>❖ [New Affordability] Up to 10 points for Market Integration—Developments that promote economic integration by providing at least 5% of units that are not income restricted and the market study shows the market rents are at least 110% of the applicable HTC rents (p. 35).</p> <p>❖ [New Affordability] Up to 5 points for Underserved Counties: Developments located in a county where the volume of HTC per capita is less than what the county would have received if allocations were based solely on population size. Greater than 2= 1 point; > 1.5-2 = 2 points; > 1 – 1.5 = 3 points; > 0 – 1 = 4 points; 0 = 5 points (p. 36).</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>

<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ (-) [New Affordability] Up to 5 points for developments located in a census tract with a high percentage of Very Low-Income (VLI) households. 1 point if 30-48% of HH's VLI; 3 points if 48-66% of HH's VLI; 5 points if >66% of HH's VLI (p. 36). ❖ [New Affordability] Low Poverty Area— Developments located in census tracts with a poverty level of either 15% and below or 10% and below receive points as follows: Central City—3 points for poverty rate of 30% and below; 5 points for poverty rate of 20% and below. Metro/Suburban/Rural — 3 points for poverty rate of 15% and below; 5 points for poverty rate of 10% and below (p. 38).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<p>See A2: set-aside for non-R/ECAP developments.</p> <ul style="list-style-type: none"> ❖ Projects located in a High or Very High Opportunity census tract as designated by the USR Opportunity Index are eligible for a 130% basis boost (p. 28). ❖ Second tiebreaker: (New Affordability applications) Priority goes to application with higher Opportunity Index ranking (p. 34). ❖ [New Affordability and Service Enriched Housing] Up to 10 points for proximity to amenities: Full-service supermarket with fresh produce (3 points); Pharmacy (2 points); Medical clinic (1 point); Public recreation center (1 point); Public park (1 point); Public library (1 point); Public elementary, middle, or high school (1 point). Distances: 1 mile for Central City, 2 miles for Metro/Suburban; 5 miles for Rural (p. 37). ❖ [New Affordability] Job Access—Up to 5 points for developments meeting either of the following: Within a linear distance (1 mile for Central City, 2 miles for Metro/Suburban; 5 miles for Rural) of 3,000 or more jobs. 3,000 – 3,999 jobs = 3 points; 4,000 – 4,999 jobs = 4 points; 5,000 and greater jobs = 5 points. OR Located in a census tract with an Entry Level Job Index score of at least 0.50 as defined in the applicable QAP Interactive Map: 0.5 – 0.99 = 3

	<p>points; 1.0 – 1.5 = 4 points; Above 1.5 = 5 points (p. 38).</p> <ul style="list-style-type: none"> ❖ [New Affordability] Opportunity Area (Family Only; applies only if not requesting points for location in Neighborhood Revitalization area)—Points if development is located in: Very High Opportunity Area (5 points); High Opportunity Area (4 points); Moderate Opportunity Area (3 points); Low Opportunity Area (2 points); Very Low Opportunity Area (1 point) (p. 39).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ [New Affordability and Service Enriched Housing] Within proximity to amenities category—1 point for proximity to public elementary, middle or high school (p. 37). See A4b.
<p>A6. Scoring that discourages development in distressed neighborhoods.⁷⁷</p>	<ul style="list-style-type: none"> ❖ [Threshold Requirement] OHFA will not select New Affordability or Permanent Supportive Housing applications for developments sited adjacent to any detrimental land use or sufficiently close to impair residents’ use. Detrimental land uses include: significant numbers of uncontrolled Blighted parcels; high levels of noise and/or noxious odors; land uses incompatible with residential occupancy (e.g. landfills, factory farming, etc.); others as determined by OHFA (p. 24). ❖ (-) Preserved Affordability allocation pool reserves 20% of LIHTC for preservation projects (p. 31) ❖ (-) [Preserved Affordability] Up to 10 points for either Financially Troubled Assets, Risk of Market Rate Conversion, or Need for Replacement developments (p. 40). ❖ (-) [Preserved Affordability] Up to 15 points for subsidy preservation. Developments that preserve the following percentages of a federal, project-based rental subsidy are awarded points as follows: 74% or less of the affordable units = 8 points; 75-84% of the affordable units = 10 points; 85-94% of the affordable units = 13

⁷⁷ 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>points; 95-100% of the affordable units = 15 points (p. 41). [Also a positive for G1].</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ [New Affordability] Up to 5 points for transportation services (p. 37). See notes below for details. ❖ [Service Enriched Housing] Up to 10 points for transportation services (p. 42). See notes below for details.
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ [New Affordability] Set-aside for Revitalization Area: For each of the three geographic Pools, OHFA will award at least one housing development in a QCT meeting all of the following criteria: In an area subject to a Revitalization Plan; The proposed development is not located in a High or Very High Opportunity Census tract; The proposed development will not be restricted to occupancy by persons 55 years of age or older.; No more than 35% of affordable units may be one-bedroom and/or efficiencies.; 10% of all affordable units must be three-bedroom or larger and also be affordable to those earning 60% AMI or less (p. 31). ❖ [New Affordability] Set-aside for Appalachian Counties: OHFA will award two developments in the Rural Pool located in one of the 32 Appalachian counties as designated in the Appalachian Regional Development Act of 1965, as amended (p. 31). ❖ [New Affordability] Neighborhood Revitalization (Family Only; applies only if not requesting points for location in Opportunity Area)—5 points if development is located in an area that is BOTH within 2 miles of real estate development and/or community development investments of at least \$10,000,000 completed in calendar years 2019, 2020, and/or 2021, and \$10,000,000 planned and committed for calendar years 2022-2024 AND within the area of a Revitalization Plan dated within the past ten years (p. 38).

B1. Local participation in site selection is limited to statutory minimum. ⁷⁸	❖ (-) [New Affordability] Up to 15 points for leveraging funds, including from established local government housing programs (p. 36).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ Affirmative Fair Housing Marketing Plans (AFHMP) and affirmative marketing procedures are required for all projects receiving funding (p. 53).
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 in high-opportunity areas.	❖ As part of annual compliance monitoring, the owner must show that they have not refused to lease a unit in the project to a Section 8 applicant because the applicant holds a Section 8 voucher or certificate (p. 50).
F1. Incentives for larger family units.	See A2: set-aside for non-R/ECAP developments (5% of units must have 3+ bedrooms). See A8: set-aside for Revitalization Areas (10% of units must have 3+ bedrooms). ❖ [New Affordability] (Family Only) For family properties, 15% of units must be three or more bedrooms. (5 points) (p. 37).
F2. Incentives targeting families/families with children	❖ OHFA will award at least 35% of New Affordability HTCs to family or senior proposals (p. 30).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ New Affordability in which 25% or more of units are affordable to ELI households are eligible for a 115% basis boost (p. 29). ❖ [New Affordability] Up to 10 points for ELI Targeting—Developments that will commit to the following minimum percentage of all affordable units being occupied by and affordable to households at or below 30% AMI: 20% in Central City; 15% in Metro/Suburban; 10% in Rural (p. 35). ❖ [New Affordability] Up to 10 points for Project-Based Rental Subsidy—Developments that have

⁷⁸ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>a commitment of project-based rental subsidy for a minimum of 15% of the units from the local housing authority or transferred housing assistance contracts through HUD (p. 35).</p> <p>See A6—Subsidy Preservation.</p>
REPORTING REQUIREMENTS	
<p>H1. Racial/demographic reporting requirements.</p>	<ul style="list-style-type: none"> ❖ The owner of a housing tax credit project must keep records for each qualified low-income building in the project for each year of the compliance and extended use period that includes demographic information (p. 47-8).
OTHER CATEGORIES	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<ul style="list-style-type: none"> ❖ All HTC developments must incorporate all mandatory Universal Design components, as outlined in Appendix D of the QAP, and either 10 additional in 50% of units or 5 additional in 100% of units (p. 29). ❖ Service Enriched Housing allocation pool reserves 14% of LIHTCs for Permanent Supportive Housing (p. 31).
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Applicants will commit at least 10% or five units in the proposed development to participation in the Section 811 Project Rental Assistance Program upon OHFA request (p. 25). ❖ OHFA will award at least 35% of New Affordability HTCs to family or senior proposals (p. 30). ❖ [Service Enriched Housing] High Need County—Developments that are located in a county with a high number of literally homeless individuals as determined by HUD’s 2019 Point in Time (PIT) count receive points as follows: 50-99 = 1 point; 100-499; 2 points; 500-999 = 3 points; 1,000-1,499 = 4 points; 1,500 or greater = 5 points (p. 43).
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ New Affordability: single family development set-aside will award one development in the Central City Pool involving the new construction of single-family homes or townhomes, including but not limited to those intended for eventual resident ownership (p. 31).

<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ Strategic Initiatives allocation pool includes priority selection consideration for proposals that assist Ohio in meeting its obligation to Affirmatively Further Fair Housing including but not limited to projects that enhance mobility strategies and encourage development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization (p. 32). ❖ As part of annual compliance monitoring, owner must show that no finding of discrimination under the Fair Housing Act has occurred for the project (a finding of discrimination includes an adverse final decision by HUD, an adverse final decision by a substantially equivalent state or local fair housing agency, or an adverse judgment from a Federal court) (p. 50). ❖ The owner shall comply and ensure the project complies with all requirements of the federal Fair Housing Act, Ohio Revised Code Section 4112, and local fair housing requirements (p. 52).
<p>Change since 2015?</p>	<p>A2; A4a; A4b; A5; A6; A7; A8; B1; F1; F2; G1; O1; O2; O3; O4</p>

QAP (2022-23): <https://ohiohome.org/ppd/documents/2022-2023-QAP.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 90 (New Affordability); 40 (Preserved Affordability); 80 (Service Enriched Housing)

OHFA will distribute the annual per capita amount among the following allocation pools:

- New Affordability: Central City—26%
- New Affordability: Metro/Suburban—23%
- New Affordability: Rural—17%
- Preserved Affordability—20% **[A6]**
- Service Enriched Housing—14% **[O1]**

New Affordability set-asides: Non-R/ECAP; Revitalization Area; Single Family Development; Appalachian County (p. 30-31)

Preserved Affordability set-asides: RAD Conversion; USDA Subsidy Preservation (p. 31).

Service Enriched Housing set-aside: Balance of State/Small CoC (At least one award will be in Canton/Stark, Youngstown/Mahoning, Lucas County, or the Balance of State Continua of Care.) (p. 31-32).

Basis boost categories (130%) (in addition to projects located in DDAs or QCTs): 1) Service Enriched Housing; 2) projects located in a High or Very High Opportunity census tract as designated by the USR Opportunity Index [A4b]; 3) projects located in Moderate USR Opportunity Index areas that also have a Strong Growth or higher Community Change Index rating (p. 28).

Basis boost categories (115%): 1) developments competing in the Rural and Preserved Affordability pools; 2) New Affordability in which 25% or more of units are affordable to ELI households [G1]; 3) a Minority or Women-Owned Business is the Majority General Partner in the ownership structure (p. 29).

New Affordability Transit Points: OHFA will award points based on the following Center for Neighborhood Technology’s Transportation Connectivity Index (TCI) as shown in the applicable QAP Interactive Map. “Free Rides” are defined in two ways:

- Development-provided transportation: (Option 1) Transportation services are provided by the development (funded by development or partner organization) at no charge to the residents, and available to residents at least five times per week.; or
- On-Demand Service: (Option 2) Transportation is available to residents on an on demand basis, coordinated by the property, and provided at no charge or reduced charge for residents. (5 points)

New Affordability:

Available Points	Central City	Metro/Suburban	Rural
1 point	TCI Score = 1-2	TCI Score = 1	N/A
3 points	TCI Score = 3-5	TCI Score = 2	TCI Score = 1 or Free Ride Option 1
5 points	TCI Score = 6 or higher	TCI Score = 3 or higher	TCI Score = 2 or Higher or Free Ride Option 2

Service Enriched Housing:

Available Points	Central City	Metro/Suburban	Rural
2 points	TCI Score = 1-2	TCI Score = 1	N/A
4 points	TCI Score = 3-4	TCI Score = 2	N/A
6 points	TCI Score = 5-6	TCI Score = 3	N/A
8 points	TCI Score = 7-10 or Free Ride Option 1	TCI Score = 4-5 or Free Ride Option 1	Free Ride Option 1
10 points	TCI Score = 11 or higher or Free Ride Option 2	TCI Score = 6 or higher or Free Ride Option 2	Free Ride Option 2

CHANGES SINCE 2015:

Ohio’s QAP appears to be significantly revamped since evaluation in 2015. While priority categories, set asides, and point awards have similar substantive content, the changes in form they take makes a one-to-one comparison with the previously evaluated QAP more difficult. Note also that OHFA’s housing goals are not laid out in 2022-23 QAP as explicitly as in the past.

A2: Non-R/ECAP set-aside, priority selection consideration in Strategic Initiative allocation pool, points for market integration and underserved counties are all new.

A4a: Points for development in census tracts with a high percentage of Very Low Income households is new.

A4b: QAP no longer contains any reference to workforce housing as such. Basis boost for projects in High/Very High Opportunity census tract, points for job access and Opportunity Area are new.

A5: Points for proximity to public elementary, middle or high school have been added.

A6: Points for developments siting away from detrimental land uses are now a threshold requirement. Reservation of 20% of LIHTC for preservation projects is new.

A7: Points for transportation services have been added to QAP.

A8: Points for developments located in one of the 32 Appalachian counties as designated in the Appalachian Regional Development Act of 1965 are no longer present—this incentive has been converted into a set-aside within Rural development pool. Points for siting in Revitalization area are no longer present—this incentive has been converted into a set-aside.

B1: Points no longer awarded for comprehensive outreach strategy. Points no longer awarded for letter/resolution from government. Points no longer awarded for receiving a priority designation from local government. Large point value now awarded for leveraging funds.

F1: Requirements within set-asides for 3+ bedroom units are new (because the set-asides are new). Requirement/point award for 3+ bedrooms in 15% of units in family properties is new.

F2: OHFA commits to awarding at least 35% of New Affordability HTCs to family or senior proposals.

G1: Basis boost for ELI households is new. Point award for ELI targeting has been increased to a high point value, garnering a strong positive ranking. Points for new PBRRA is new.

O1: Reservation of 14% of LIHTCs for PSH is new. Requirement for minimum visibility standards has been removed, but Universal Design component requirement has been added.

O2: Threshold Requirement for 10% or 5 units for Section 811 upon OHFA request; OHFA commitment to awarding at least 35% of New Affordability HTCs to family or senior proposals; and point award for siting in county with high number of homeless individuals are all new.

O3: Incentive for homeownership is different—guarantee of award to one development in Central City Pool that may, but not must, be intended for eventual resident ownership instead of a point award.

O4: New Strategic Initiatives allocation pool includes priority selection consideration for proposals that assist Ohio in meeting its obligation to Affirmatively Further Fair Housing.

Basis boost categories have also been changed.

OKLAHOMA: (QAP 2023)	Oklahoma Housing Finance Agency
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.	<ul style="list-style-type: none"> ❖ 3 points will be awarded to proposed Developments not located within a 3 mile radius of any 9% LITHC Awards which have been made in the 2 year period preceding this Application's date of consideration (p. 27)
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.	<ul style="list-style-type: none"> ❖ 5 points for developments in High Opportunity Areas: <ul style="list-style-type: none"> • 5 points if the zip code's estimated poverty rate percentage is less than the State poverty level; OR 5 points if the median household income is more than the State Median Household Income; OR • 5 points if the proposed development is located in a Federal Opportunity Zone as defined by the State of Oklahoma (p. 27) ❖ 1 point for each item that is located either within a 1-mile radius of the proposed development in urban areas or within a 4-mile radius of the proposed development in rural areas. Items include School, Grocery Store, Pharmacy; Bus Stop; Public Park; Hospital or Urgent Care Center; Daycare; Library; Bank; Public Recreational Facility; Police or Fire Station (p. 28) ❖ 3 points if the total population growth for the past 3 years for the County in which the development is located is $\geq 2\%$ for populations of less than 25,000 and $\geq 1\%$ for populations of more than 25,000 OR if the total population growth or the past 3 years for the Town or City in which the development is located is $\geq 2\%$ for

	populations of less than 25,000 and $\geq 1\%$ for populations of more than 25,000 (p. 28)
A5. Scoring or requirements that preference siting near high-quality schools.	No
A6. Scoring that discourages development in distressed neighborhoods. ⁷⁹	<ul style="list-style-type: none"> ❖ 1 point for development in a DDA (p. 26) ❖ 3 points for preservation of affordable housing (p. 30) ❖ Applications for Acquisition/Rehabilitation or Rehabilitation will automatically receive 3 points under Tenant Populations of Individuals with Children (p. 30)
A7. Scoring or requirements that preference siting near mass transit.	No
A8. Focus on and operationalization of a neighborhood revitalization plan.	❖ 1 point for a development in a QCT with a revitalization plan (p. 26)
B1. Local participation in site selection is limited to statutory minimum. ⁸⁰	❖ [See A8] The revitalization plan must be signed by the local governing body with jurisdiction over the site within which the proposed Development is located at the time of the Application (p. 26)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ [Compliance] Any unit promised for a targeted population must have been marketed for a period of 90 days for Targeted Persons (see O2) before in can be rented to a tenant that does not have the designated special need. the Owner must show ongoing due diligence in attempting to locate a special needs tenant for the unit. Due diligence must include, but is not limited to, monthly advertisement in a newspaper of general circulation in the area, and proof of at least monthly contact with providers of services for individuals with the designated special need or targeted population, including advising such providers of the number and size of units available, the rents charged for the units,

⁷⁹ 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.

⁸⁰ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	and the income limits for prospective tenants. Service providers must also be contacted immediately upon a special needs unit becoming available. The owner must have a plan in place (p. 29)
C2. Scoring that incentivizes affirmative marketing.	No
C3. Scoring that incentivizes 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 in high-opportunity areas.	❖ The Owner/Applicant must certify that they will accept referrals from Public Housing waiting lists and/or OHFA (Attachment 6, p. 42)
F1. Incentives for larger family units.	❖ 3 points if at least 50% of the total AHTC units have two bedrooms or more OR at least 30% of the total AHTC units have three bedrooms or more (p. 30) If the Development receives 8 points in the Targeted Populations category, it will not receive points in this category.
F2. Incentives targeting families/families with children	See F1 ❖ 1 point for a development that includes a playground with 3 or more different features grouped together (p. 49)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Up to 5 points for Income Targeting. Applications will be evaluated to the extent the Development targets Lower-Income populations with AHTCs. Income targeting points will be awarded based on the percentage of total AHTC units targeted to persons at or below the targeted AMI to the total number of AHTC units (excluding any employee unit(s)) in the Development. The number of units is to be rounded up to nearest whole number <ul style="list-style-type: none"> • At least 40% at or below 50% AMI; OR • At least 10% at or below 30% AMI (p. 24) ❖ 3 points for preservation of affordable housing (p. 30)

REPORTING REQUIREMENTS

H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	(See O2)
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ 5 points if the Applicant dedicates at least a minimum 10% of the total residential units for Targeted Populations (Homeless, persons with mental or physical disabilities, Veterans, or Youth aging out of Foster Care (p. 29)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ If an Applicant wishes not to commit their Development to an extended term of affordability as described above, then they may propose tenant ownership after the 15-year Compliance Period with a satisfactory plan. If electing Tenant Ownership, Applicants must submit a detailed plan which includes projections on maintenance, tenant reserve funds, home buyer training, continued affordability, sales price calculation, and etc. The plan will be evaluated for feasibility (p. 25-26)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ One individual each representing the Developer, Architectural firm and General Contractor will be required to have completed training in Fair Housing Accessibility, Design, and Construction prior to application. The training must cover at least four (4) hours of relevant material. If providing more than one certificate to meet the 4-hour requirement, agendas of each training must be provided (p. 21) The proposed Management Company for any application will also be required to have two individuals attend training on ADA and Fair Housing from the management perspective prior to application submittal (p. 22) ❖ Attachment #8 is a certification that the development will comply with all Fair Housing and ADA requirements (p. 44)
Change since 2015?	A2; A4b; A6; A8; B1; C1; F1/F2

QAP: <https://www.ohfa.org/affordable-housing-tax-credits/#qap>

NOTES:

- There will be a set-aside of \$1,000,000 each Funding Period for those Applicants applying for Tax Credits who are also a Choice Neighborhoods Implementation Grantee. Any Tax Credits awarded in this set-aside must be used in the Neighborhood in which the Choice Neighborhoods Implementation Grant was awarded. In addition, Applicants applying under this set-aside will not be eligible for any other set-aside. Furthermore, Applicants applying in this set-aside will not be eligible for State Tax Credits. Any Tax Credits not awarded within this set-aside will be disbursed according to the percentages of the other applicable set-asides listed below.
- Following the Choice Neighborhoods Implementation Grant set-aside, applications will then be considered in this order:
 - Nonprofit 15%
 - New Construction 55%
 - Rehabilitation 30%
 - Total Allocation percentages 100%
- Allocation preferences are as follows:
 - New Construction with Common Property Ownership
 - Acquisition/Rehabilitation with Common Property Ownership
 - Preference for “Preservation” Developments
 - Second Preference for Developments with a minimum 75% of units receiving rental assistance
 - New Construction without Common Property Ownership
 - Acquisition/Rehabilitation without Common Property Ownership
 - Preference for “Preservation” Developments
 - Second Preference for Developments with a minimum 75% of units receiving rental assistance

TOTAL POINTS POSSIBLE: 52

CHANGES SINCE 2015:

- **A2:** More points now awarded to proposed developments not located near previous LIHTC developments
- **A4b:** QAP now included provisions encouraging development in High Opportunity Areas, namely areas of low – medium income, areas in proximity to services, and areas experiencing population growth
- **A6:** Fewer points now allocated to provisions that encourage development in distressed neighborhoods
- **A8:** QAP no longer mentions enterprise zones or enterprise communities
- **B1:** QAP no longer requires local support. New inclusion is that the community revitalization plan must be signed by the local governing body of the jurisdiction
- **C1:** QAP now includes an affirmative marketing provision for developments promising units for Targeting Populations
- **F1/F2:** Fewer points now given for larger family units

STATE: OREGON (QAP 2022)	Oregon Housing and Community Services
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>Regional Pool Set-Aside: Allocated to the following Set-Aside Regions based on 5-year American Community Survey Data on severely rent-burdened households and renter households with a head of household of color:</p> <ul style="list-style-type: none"> • Portland Metro Counties (HUD HOME Participating Jurisdictions of Clackamas County, Multnomah County, and Washington County) • Non Metro HUD HOME Participating Jurisdictions (the cities of Eugene, Salem and Springfield, and Marion County) • Balance of State Urban (cities of Albany, Ashland, Bend, Central Point, Dallas, McMinnville, Medford, Newberg, Redmond, and Woodburn) • Balance of State Non-Urban/Rural (Balance of State) <p>No region to be allocated less than \$1 million in 9% LIHTC. If Balance of State Urban or Balance of State Non-Urban/Rural are undersubscribed, the remaining resources should first be moved to the other Balance of State region before reverting to the overall Regional Pool Set-Aside.</p>
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ Projects that result in the de-concentration of poverty by locating low-income housing in low poverty areas, which are Census Tracts where 10 percent or less of the population lives below the poverty level are eligible for 130% basis boost (p. 33). [Also applies to A4a]. ❖ (-) 1 point if Severe Rent Burden (spending more than 50% of income on rent) higher than State/region (p. 37). [Negative provision to the extent that a large share of cost burdened renters encourages racial and economic concentration]

	<ul style="list-style-type: none"> ❖ Up to 8 points for Vulnerable Gentrification Area: This scoring will compile data considering various aspects of a neighborhood including its income profile, vulnerable people, precarious housing location, housing market activity, and neighborhood demographic change. Data Considered for Income: Low Income Households and Household Income Data Considered for Vulnerable People: Black, Indigenous, People of Color (BIPOC) / Non-White demographics, limited language proficiency figures, persons with disabilities, female headed households, individuals 65 years of age and older. Data Considered for Precarious Housing: Multifamily Units, and Housing built before the 1970s. Data Considered for Housing Market Activity: Median Rent, Rent Change, Median Home Values, Home Value Change. Data Considered for Neighborhood Demographic Change: Change in BIPOC, change in educational attainment, change in homeownership, change in household income (p. 38). [Also a weak positive provision for A4b]
	No.
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>See A2 for basis boost eligibility for projects in census tracts with 10% or less of the population below the poverty level.</p> <ul style="list-style-type: none"> ❖ Location Opportunity & Environmental Factors points include 1 point if Project is in a census tract where 50% or more of households earned more than 100% of the area median income in the last three consecutive years for which data is available, and the poverty rate is less than or equal to 20% during the same period (p. 37). See A4b.
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 5 points for Location Opportunity & Environmental Factors: 1 point if Project is not in a USDA food desert; 1 point if

	<p>Project has access to Parks & Public Space; 1 point if Project is in a census tract where 50% or more of households earned more than 100% of the area median income in the last three consecutive years for which data is available, and the poverty rate is less than or equal to 20% during the same period [A4a]; 1 point for access to School / Education / Library / Workforce Training [A5]; 1 point for Projects in Urban Areas if in a TOD or within 1/2 mile of fixed transit stop [A7]; 1 point for Projects is in Rural Areas and has access to transit options [A7] (p. 37).</p> <ul style="list-style-type: none"> ❖ See A2—Vulnerable Gentrification Area.
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ Location Opportunity & Environmental Factors points includes 1 point for access to School / Education / Library / Workforce Training (p. 37). See A4b.
<p>A6. Scoring that discourages development in distressed neighborhoods.¹</p>	<ul style="list-style-type: none"> ❖ (-) 25% of total allocation set aside for Preservation Projects (p. 13). ❖ (-) Preservation projects are eligible for 130% basis boost (p. 33).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ Projects that are located in Transit Oriented Districts (TOD’s) as designated by local governments are eligible for 130% basis boost (p. 33). ❖ Location Opportunity & Environmental Factors points include 1 point for Projects in Urban Areas if in a TOD or within 1/2 mile of fixed transit stop and 1 point for Projects in Rural Areas and has access to transit options (p. 37). See A4b.
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 1 point for location in a QCT with a Concerted Revitalization Plan (demonstrated through investment of public resources into capital improvements of residential, commercial, or infrastructure) (p. 37).

B1. Local participation in site selection is limited to statutory minimum. ²	No.
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No.
C2. Scoring that incentivizes affirmative marketing.	<ul style="list-style-type: none"> ❖ Up to 7 points for Affirmative Fair Housing Marketing: 1 point in Urban Areas and up to 2 points in Rural Areas for including analysis of underserved population demographics in determining outreach strategies; 1 point for including partnership with local service / referral agencies in reaching underserved populations to build the Project wait list; Up to 2 points for using two or more referral and advertising methods; Up to 2 points in Urban Areas and 1 point in Rural Areas where referral and outreach organization partner is culturally responsive; Up to 1 point for implementing low-barrier tenant screening (p. 38-39).
C3. Scoring that incentives language access and marketing to non-English speakers.	<ul style="list-style-type: none"> ❖ QCSO requirement to target populations "least likely to apply" references marketing materials in other languages for limited English proficient individuals (p. 12). See notes on QCSO's below.
D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ 1 point to projects with an established commitment to marketing to public housing waitlists (p. 40, 47). ❖ [Preservation] Up to Three (3) points; Voucher Utilization Rate of the community's Public Housing Authority; three (3) points, if high voucher turn back, porting rate or likelihood of relocating more than 20 miles (p. 45).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ Up to 5 points for Family Sized Units: Up to 3 points for units with 3+ bedrooms (minimum 5 units, incentive up to 15% of total affordable units); Up to 2 points for units with 2+ bedrooms (minimum 12

	units, incentive up to 45% of total affordable units) (p. 36).
F2. Incentives targeting families/families with children	See F1.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Projects with at least 20% of the units restricted to LIHTC Extremely Low (30%) rents and income limit are eligible for 130% basis boost (p. 33). ❖ Up to 5 points for Rents serving the lowest AMI: AGMI restrictions on qualified units (Portland Metro Counties; Non-Metro HUD HOME PJs; and Balance of State Urban) --5 points if AGMI is 30% or less, 4 points if 31-40%, 3 points if 41-50%, 2 points if 51-60% and 1 point if 60%. AGMI restrictions on qualified units (Balance of State non-Urban/Rural Jurisdictions) --5 points if AGMI is 40% or less; 4 points if 41%-50%; 3 points if 51%-60%; and 2 points if greater than 60% (p. 39, 46). [scale slightly different for Preservation Projects] ❖ Up to 3 points for PBRA: 3 points if project-based assistance for more than 67% of the affordable units; 2 points if project-based assistance for 34%- 66% of the affordable units; and 1 point if project-based assistance for 33% of the affordable units or voucher commitment (p. 39). ❖ [Preservation] Up to 5 points, scaled scoring, for the percentage of the Project occupied by households earning 30% AMI or less⁸¹ (p. 45). ❖ [Preservation] Up to 5 points, scaled scoring, for the percentage of the Project with PBRA (p. 45).

⁸¹ Up to Five (5) points; Extremely Low Income; five (5) points, if Greater than 60% of the units at 30% of Area Median Family Income or below; three (3) points, if 40%-60% of the units at 30% of Area Median Family Income or below; one (1) point, if 25%-39% of the units at 30% Area Median Family Income or below.

REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2—PSH and special needs scoring includes individuals with disabilities.
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Projects serving permanent supportive housing (PSH) goals are eligible for 130% basis boost (p. 33). ❖ Up to 5 points for PSH: Up to 2 points if 25% or greater of the Project’s total affordable units dedicated to PSH (minimum 5 such units to qualify); 1 point if at least 15%-24% of the units dedicated to PSH; 1 point for having participated in OHCS-provided PSH training and technical assistance; 1 point for commitment of supportive tenancy service resources; 1 point for demonstrated experience in owning PSH affordable housing, managing PSH affordable housing, and/or providing services in PSH affordable housing (p. 36). ❖ Up to 4 points for including targeting of special needs populations (broadly defined) in 10-25% or more of the total affordable units (p. 36). [Also applies to O1]. ❖ [Preservation projects only] Vulnerable Tenant Displacement: Up to 15 points, scaled scoring, for the percentage of the Project occupied by vulnerable population (frail elderly, disabled, large families, special needs populations, service dependent) who would face hardships from relocation, are extremely low income, and have PBA (p. 45).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 1 point for Projects intended for eventual tenant ownership (p. 39).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ 10% set aside for QCSOs (see notes) (p. 12).

	<ul style="list-style-type: none"> ❖ Part of annual compliance monitoring includes tracking of compliance with the Fair Housing Act (p. 24). ❖ OHCS reserves the right to waive any provision or requirement of the QAP that is not stipulated in Section 42 of the Code in order to affirmatively further fair housing (p. 55).
Change since 2015?	A2; A4a; A5; A6; A7, A8; B1; C2; C3; G1; H1

QAP (2022):

<https://www.oregon.gov/ohcs/development/Documents/2022%20Updated%20Final%20QAP.pdf>

2022 9% LIHTC NOFA: <https://www.oregon.gov/ohcs/development/Documents/nofa/2022/2022-5-LIHTC9-NOFA-v1.2.pdf>

- HOME funds may also be requested in association with this NOFA (p. 3).

NOTES:

TOTAL POINTS POSSIBLE: 93 (New Construction and Acquisition/Rehabilitation); 103 (Preservation)

Set aside categories include: Qualified Non-Profit (10%); Qualified Culturally Specific Organizations/Developers (QCSO) (10%) (see below); Preservation Projects (25%); Tribal Lands (10%); Regional Pool (65%).

Qualified Culturally Specific Organizations/Developers (QCSO): Defined as being a Project sponsored by an organization that is designed to serve historically underserved communities representing “least likely to apply” for housing occupancy (**O4**). The QCS Organization must: be representative of a community or significant segments of a community and provide affordable housing to low- and very low-income households; and demonstrate primary target populations served to be “least likely to apply.” A target population is “least likely to apply” if there is an identifiable presence of a specific demographic group in the housing market area, but members of that group are not “likely to apply” for the housing without targeted outreach, including marketing materials in other languages for limited English proficient individuals (**C3**), and alternative formats for persons with disabilities. Reasons for not applying may include, but are not limited to, insufficient information about housing opportunities, language barriers, or transportation impediments (p. 12).

Projects eligible for 130% basis boost include: Rural Projects (defined as communities with populations of 15,000 or less, outside of the Portland Urban Growth Boundary, in counties within Metropolitan Statistical Areas (Benton, Clackamas, Columbia, Deschutes, Jackson, Marion, Multnomah, Polk, Washington, and Yamhill Counties) and in communities with populations of 40,000 or less in the balance of the State.); Preservation Projects [**(-A6)**]; Projects serving permanent supportive housing goals [**O2**]; Projects sited on tribal lands; Projects with at least twenty percent (20%) of the units restricted to LIHTC Extremely Low (30%) rents and income limit [**G1**]; Projects that are located in Transit Oriented Districts (TOD’s) as designated by local governments [**A7**]; Projects that result in the de-concentration of poverty

by locating low-income housing in low poverty areas, which are Census Tracts where 10 percent or less of the population lives below the poverty level [A2, A4a] (p. 33).

CHANGES SINCE 2015:

OHCS added specific set-aside categories some time since their QAP was evaluated last. Many “preferences” without specific point award in previous QAP are now incentivized through eligibility for a 130% basis boost.

A4a: Added a point award for siting in high-income census tract.

A5: Added a point award for access to school.

A6: 25% set-aside for preservation projects is new.

A7: Added a point for projects located in a TOD or in proximity of a fixed transit stop.

A8: OHCS removed preference for projects part of a concerted community revitalization plan. Added a point for projects part of a CCR plan.

B1: Removed provision awarding points for submitting a letter demonstrating local preference.

C2: Added section awarding points for Affirmative Fair Housing Marketing.

C3/O4: Set aside for QCSO’s is new.

H1: QAP no longer contains reference to requiring assistance with federal reporting requirements.

O3: OHCS removed preference for projects intended for eventual tenant ownership.

O4: OHCS reservation of right to waive provisions of QAP (that are not federal requirements) in order to AFFH is new.

STATE: Pennsylvania (QAP 2022)	Pennsylvania Housing Finance Agency (PFHA)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentrations	❖ Applications that have resulted from or will result in the permanent displacement of low-income residents will be rejected unless the Applicant provides evidence satisfactory to the Agency that an appropriate relocation plan has been developed. Furthermore, to the greatest extent feasible, all existing low-income residents must be offered their choice to either be temporarily relocated until such time, upon completion of the development, as they are able to return to an appropriately sized affordable unit in the development, or receive relocation benefits. Applicants are required to document the efficacy of notice given to

	residents to the satisfaction of the Agency. (p. 16)
A2. Scoring that discourages racial and economic concentration.	No
A3. Mandatory requirements or set-asides for development in high-opportunity areas	<ul style="list-style-type: none"> ❖ QAP states a preference for developments in areas of opportunity (p. 28); it is the goal of the PHFA to encourage affordable housing in areas with job opportunities; in areas near strong and stable communities, in areas which demonstrate capacity for community revitalization opportunities, and in the developments which promote community and economic development and address social inequities. (p. 34) ❖ The Agency will reserve Tax Credits to, at a minimum, three (3) developments in the Suburban/Rural Pool which expand housing opportunities and design choices in areas suitable for long-term economic growth with an existing or planned infrastructure to support future growth in the area, in order to promote mixed-use and/or mixed-income development within a community setting. These developments will be located in areas of strong schools and employment opportunities and in communities which may have not received representative resources in the past. (p. 30)
A4a. Scoring that encourages development in high-income areas	No
A4b. Scoring that encourages development in high-opportunity areas	<ul style="list-style-type: none"> ❖ Up to 13 points may be awarded to developments located in areas that demonstrate the following relative to the immediate market area: low poverty rates, limited affordable housing options (both subsidized and non-subsidized), limited affordable housing production in past 20 years, close proximity to employment, strong housing markets, high owner-occupied markets. (p. 34) ❖ Projects located in “areas of opportunity” are eligible for a 130% basis boost (p. 53).
A5. Scoring or requirements that preference siting near high-quality schools.	<ul style="list-style-type: none"> ❖ The Agency may award up to 2 points to those developments located in a public school district whose senior high school

	<p>combined average in English, Math, and Science proficiency on the Pennsylvania System of School Assessments (PSSA) is greater than or equal to 70%. (p. 34)</p>
<p>A6. Scoring that discourages development in distressed neighborhoods</p>	<ul style="list-style-type: none"> ❖ (-) At least 4 preservation properties will be awarded. Eligibility requires properties to demonstrate that Tax Credits are necessary to extend the long-term affordability and habitability of the development or that there is a likelihood of conversion to market rate housing (p. 28).
<p>A7. Scoring or requirements that preference siting near transit</p>	<ul style="list-style-type: none"> ❖ The agency may award up to 2 points for developments located within one-half mile of a completed or planned public transportation fixed route stop (p. 36)
<p>A8. Focus on a neighborhood revitalization plan</p>	<ul style="list-style-type: none"> ❖ The Agency encourages the new construction and preservation of developments that support neighborhood revitalization. (p. 5) ❖ The Agency has established a preference for community revitalization developments. (p. 28) ❖ The Agency will reserve Tax Credits to, at a minimum, 3 developments in the Urban Pool which support a broader community revitalization program which has the capability of changing fundamentally the character of a neighborhood, enhancing the lives and amenities available to residents of the community, is focused on implementing a “mixed income” strategy, and/or which seeks to counteract the pattern through which some metropolitan areas are being segregated by income or race. (p. 29). Measurable terms are included in the notes below. ❖ It is the goal of the Agency to encourage affordable housing in areas which demonstrate the capacity for community revitalization opportunities. (p. 34) ❖ The Agency may award 5 points for developments contributing to an existing revitalization plan. To qualify for points in

	<p>this category, the applicant must submit a letter from an official of the local government explaining how the development will contribute to the community revitalization plan (p. 35).</p>
<p>B1. Local participation in site selection is limited to statutory minimum.</p>	<ul style="list-style-type: none"> ❖ No other terms on local participation except that for projects applying for the community revitalization set-aside (see A8) a measurable term is that municipal support is articulated in a publicly approved community plan or in the form of significant funding commitments (p. 30, also see notes section below).
<p>HOUSING ACCESS: Affirmative Marketing, Priority Groups</p>	
<p>C1. Mandatory requirements ensuring affirmative marketing</p>	<ul style="list-style-type: none"> ❖ All developments must participate in the PHFA-established PA Housing Search database which lists all affordable housing units in developments participating in any of the Agency’s multifamily housing programs. The database is intended as a resource for households seeking affordable housing and as a marketing tool for owner. This may also include submission of a resident survey, and will be expected to provide information including, but not limited to unit amenities, household size, household income and move-in information and any ongoing unit vacancies in a secure and timely manner (p. 13).
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<p>No.</p>
<p>C3. Scoring that incentivizes language access and marketing to non-English speakers.</p>	<p>No.</p>
<p>D1. Scoring that promotes Section 8 voucher access.</p>	<p>No.</p>
<p>D2. Requirements for monitoring Section 8 voucher access.</p>	<ul style="list-style-type: none"> ❖ Applicant must provide evidence satisfactory to the Agency that the Applicant (or any related entity), proposed management agent, or other material participant is not in violation of fair housing, housing accessibility or nondiscrimination laws or has not discriminated against Section 8 voucher and certificate holders or recipients of any state or local tenant or project based rental assistance. (p. 17)

	<ul style="list-style-type: none"> ❖ Applications must demonstrate that the housing needs of local public housing waiting lists have been met. Applicants may meet this requirement by providing either: (1) a current letter from the local public housing authority stating how the development is specifically meeting the housing needs of residents on the public housing waiting list; (2) a copy of the comprehensive plan outlining the current local public housing authority waiting list and evidence that the development will meet such resident needs; or (3) evidence of receipt of mailing to the local public housing authority prior to the date of the Tax Credit Application a letter which evidences the commitment of the developer to work cooperatively to meet the needs of persons on the local public housing waiting list (p. 18).
<p>F1. Incentives for larger family units</p>	<ul style="list-style-type: none"> ❖ Up to 10 points may be awarded for those developments providing affordable units with three or more bedrooms for large families (p. 41).
<p>F2. Incentives for targeting families or families with children</p>	<p>No.</p>
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ Developments must provide a financing plan which evidences that at least ten percent (10%) of the low-income units in Urban Areas and five percent (5%) of the low-income units in Suburban/Rural Areas are affordable to persons at or below twenty percent (20%) of the AMI, adjusted for family size. (p. 18) ❖ If two or more developments requesting Competitive 9% Tax Credits have the same ranking within a Set- Aside, Pool or Preference and only one Application can be awarded Competitive 9% Tax Credits, the Agency will select the Application that has a higher percentage of units available to residents whose incomes are at or below fifty percent (50%) of area median gross income as compared to total number of Tax Credit eligible units. If the Applications have the same percentage of units serving residents at or below fifty percent (50%) of

	<p>area median income, the Agency may select the Application that it determines best fits the Agency’s affordable housing priorities and achieves geographic distribution. In any instance, the Agency may favor selection of an Application which best evidences an ability to proceed. (p. 32)</p> <ul style="list-style-type: none"> ❖ Applicants may be awarded up to twenty (20) points for developments that the following percentages of units are designed to be substantially occupied by and affordable to residents with incomes that are at or below fifty percent (50%) of the area median income: >50% + units = 20 points; >40-50% = 16 points; >30-40% = 12 points; >20-30% = 8 points; >10-20% = 4 points (p. 39)
REPORTING REQUIREMENTS	
H1. Racial/Demographic reporting requirements	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities	<ul style="list-style-type: none"> ❖ 10 points may be awarded to developments where the developer agrees to provide twice as many fully accessible units as are otherwise required (under local, state, or federal mandate, whichever is greater) in the development (p. 40)
O2. Scoring that promotes units for special needs populations	<ul style="list-style-type: none"> ❖ The agency will reserve Competitive 9% Tax Credits to, at a minimum, 2 developments in each Pool which promote supportive housing opportunities to targeted populations including persons who are homeless, non-homeless households requiring supportive services including those with mental, physical, sensory, or developmental disabilities; persons with substance abuse disorders; persons diagnosed with HIV/AIDS and related diseases; persons being released from incarceration, and other special populations approved by the Agency on a case by case basis. (p. 28-29).
O3. Scoring to promote home ownership	<ul style="list-style-type: none"> ❖ Applications for Tax Credits must demonstrate a commitment to serve low-income residents for a period of not less than 40 years or, in the alternative, offer

	homeownership opportunities to qualified residents after the initial 15-year compliance period. Homeownership conversion proposals must present a financially viable homeownership program for residents who inhabit the units during the compliance period. The program must incorporate an exit strategy, homeownership counseling and a minimum amount of funds (not less than \$2,500 per unit) set aside by the developer to assist the residents with the purchase. (p. 16)
O4. Provisions affirmatively furthering fair housing laws	❖ Through its multifamily funding programs, the Agency encourages the new construction and preservation of developments that address housing insecurity for the most vulnerable, support neighborhood revitalization, is responsive to social inequities and disparities, provides opportunities in areas that lack affordable housing options and affirmatively furthers fair housing in the Commonwealth. (p. 5)
Changes since 2015?	A5, A7, H1

https://www.phfa.org/forms/multifamily_news/news/2022/2022-lihtc-allocation-plan.pdf

OVERALL ASSESSMENT

TOTAL POINTS POSSIBLE: 218. The Agency has established a minimum point threshold of 120 points for all developments except for those qualifying for the preservation preference which have a minimum of 110 points.

- *Tax Credits are not guaranteed to any part, regardless of the ranking or points achieved through the evaluation process.*
- *The scoring and ranking of an Application does not guarantee funding by the Agency.*

NOTES

Measurable Terms of Community Revitalization Plan (p. 29-30):

- Supports the construction and rehabilitation of housing to meet the needs of households of all income types, including the very low income
- If the development proposes to offer rents at or close to the Tax Credit program maximum (i) the availability of housing choice vouchers to make some of its units affordable to the area's lowest income households and/or (ii) the projected existence elsewhere in the neighborhood of development(s) that can be expected to provide such affordability
- Access to public transportation
- Access to public parks and open space
- Access to community serving enterprises
- Encourages the reuse and rehabilitation of existing infrastructures

- Coordination of proposed site amenities that enhance the overall neighborhood · Coordination with an overall community revitalization effort
- Of sufficient size and scope to have a significant and lasting positive impact on the community (including increasing or stabilizing tax base and economic diversity)
- Expands quality of life and fulfills a need for health care choices and other crucial service opportunities for residents of the community
- Municipal support articulated in a publicly approved community plan or in the form of significant funding commitments
- Presence of supporting local neighborhood initiatives
- Consistent with the local community’s plan to affirmatively further fair housing.

The Agency will further prioritize projects which involve the residents and surrounding community in the following activities:

- design of the proposed development,
- drafting of the tenant selection plan,
- implementation of the tenant selection plan,
- management of the proposed development,
- contracting opportunities, and
- ownership of the development.

CHANGES SINCE 2015:

A5: Added small point award for developments located in high performing public school districts.

A7: Added small point award for developments located near public transportation.

H1: Language on compliance with HERA 2008 (racial/demographic reporting requirements) has been removed.

STATE: Rhode Island (QAP 2022)	RI Housing
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Any proposal that contemplates the loss of existing deed restricted affordable homes must be accompanied with a plan outlining one-for-one replacement of the lost affordable rental homes. Proposed replacement units must be of comparable type and affordability (p. 24). ❖ RIHousing reserves the right to not reserve LIHTCs to any applicant or project if it determines that 3) there exists an overconcentration of projects in a specific geographic location; or 4) there exists an overconcentration of specific production types (p. 27-28).

	<ul style="list-style-type: none"> ❖ In its mission to meet the statewide need for affordable homes, RIHousing believes it to be in the public’s interest to avoid concentration of affordable housing in any one neighborhood, community, or corner of the State. As a small state, Rhode Island receives a relatively small statewide allocation of LIHTC. Therefore, within the goals of achieving financially feasible developments, RIHousing will generally seek to fund mid-sized developments in urban, suburban, and rural communities rather than larger scale developments (p. 28).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ Additional consideration will be given to projects that demonstrate that the proposed LIHTC rents are below those of comparable, unassisted units in the market (p. 33). ❖ In an effort to provide affordable homes in every community in Rhode Island and to assist communities that have been unable to reach a 10% affordable housing goal, 10% will be given to developments creating new affordable housing units located in areas with less than 10% existing affordable housing (p. 49).
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Rhode Island will prioritize projects that propose housing for general occupancy in “areas of opportunity” (p. 19). ❖ Up to 2 points for being in an Opportunity Zone (p. 38). ❖ Areas of Opportunity: <ul style="list-style-type: none"> • 2 points if development is located in a hi-performing school district • Up to 2 points if the development has a mixed-use component that

	<p>includes rental space for a commercial business</p> <ul style="list-style-type: none"> • Up to 4 points if the development will have a range of income levels and at least 20% of the units are considered unrestricted (p. 39). <p>❖ The proposed site, including any existing improvements, must support the intended population in terms of desirability of location; environmental quality; adequacy of utilities and transportation; proximity and connections to jobs; civic, social, commercial, recreational, and services; and appropriateness of the proposed development to the specific site (p. 46-47).</p>
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>❖ 2 points will be awarded if development is located in a hi-performing school district, meaning the school district located within the community that tenants would enroll in meets or exceeds greater than 50% achievement expectations on state RICAS exam tests in the most recent documented year of exam results (p. 39).</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁸²</p>	<p>❖ All projects submitted to RIHousing that may receive LIHTCs in combination with any form of HUD housing assistance will be subject to the subsidy layering review guidelines of Section 911 of the Housing and Community Development Act of 1992. These requirements are designed to ensure that participants in affordable multi-family housing developments do not receive excessive compensation by combining various HUD housing assistance with assistance from other federal, state, or local agencies (p. 20).</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>❖ Up to 2 points for transportation and connectivity:</p> <ul style="list-style-type: none"> • 1 point if the development is in ½ mile of a bus stop

⁸² 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.

	<ul style="list-style-type: none"> • 2 points if the development is in ¼ mile of a bus stop • .5 if the development has alternative transit options – other no or low-cost transportation services available to all residents which can be documented with a letter or agreement with the provider (p. 39).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Preference for an allocation of credits must be given to developments serving the lowest income residents, developments which commit to the longest period of affordability, and developments located in a QCT. The QCT preference will only be given when there is an added benefit to the neighborhood in the form of the project’s contributions to a concerted community revitalization plan (p. 10-11). ❖ In awarding development resources, RIHousing will prioritize 3. Dual and equal goals of a) increasing the supply of affordable housing in communities that traditionally had a lack of such housing and; b) reinvesting in urban neighborhoods where housing may be substandard, blight is common, and the housing is part of an overall neighborhood revitalization strategy. (p. 29). ❖ Up to 4 points if the development incorporates the space and/or provides supportive services to residents based on the list of prioritized services (p. 41). ❖ Points will be given for applications that address vacant, foreclosed, and/or blighted neighborhood lots. Applicants must demonstrate how the proposed housing contributes to an overall plan to revitalize and/or stabilize the neighborhood that builds upon previous investments. (p. 49)

B1. Local participation in site selection is limited to statutory minimum. ⁸³	No.
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ In addition, in order to ensure that all potentially eligible residents of RIHousing-financed developments have a fair opportunity to gain admission into those developments, RIHousing requires that sponsors employ an open and fair process that affirmatively furthers fair housing opportunities. To that end, all homes financed by RIHousing must be available to the general public, must be marketed pursuant to an approved affirmative fair housing marketing plan and must be advertised. (p. 23) ❖ At a minimum, the AFHMP must include an analysis of those populations least likely to apply for housing in the area in which the development is located and a targeted marketing program to reach those populations. (p. 23) ❖ All developments receiving LIHTC will have to complete HUD form 935.2A to detail AFHMP (p. 24)
C2. Scoring that incentivizes affirmative marketing.	No
C3. Scoring that incentives language access and marketing to non-English speakers.	<ul style="list-style-type: none"> ❖ Federally assisted recipients are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the recipient's programs and activities. To do this, the recipient should: 1) conduct the four-factor analysis, 2) develop a language access plan and 3) provide appropriate language assistance (p. 24).
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.	<ul style="list-style-type: none"> ❖ Prior to occupancy, sponsors must commit in writing that they will provide written notice to the jurisdictional Public Housing Authority committing to the acceptance of tenant-based vouchers (p. 18-19)

⁸³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

F1. Incentives for larger family units.	❖ Bonus points are available for projects that produce 3 bedroom or larger units (p. 45)
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ Sponsors are encouraged to provide housing that provides opportunities to single parent and two-parent households with children (p. 19) ❖ Priority will be given to developments that can viably and effectively serve d) households with children (p. 29)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Pursuant to HR 3221 Title I – Housing Tax Incentives, Rhode Island will prioritize projects that propose housing for very low-income persons and families (p. 19). ❖ Priority will be given to developments which can viably and effectively serve very low-income households (p. 29). ❖ Up to 6 points will be given to proposals that effectively serve people with income at or below 30% of AMI (p. 29).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	❖ The HERA included a provision directing state HFAs to collect and submit to HUD demographic and economic information on tenants living in LIHTC properties, including LIHTC projects in the extended use period. RIHousing requires owners/agents to upload and report tenant data monthly utilizing the RIHousing’s online reporting system which allows property managers to enter tenant information directly into a web-based compliance reporting system. The information is immediately uploaded to RIHousing’s online reporting system and is then transmitted directly to HUD. (p. 57).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	No
O2. Scoring that promotes units for special needs populations.	❖ Pursuant to HR 3221 Title I – Housing Tax Incentives, Rhode Island will prioritize projects that propose housing for special needs populations (p. 19).

	<ul style="list-style-type: none"> ❖ Priority will be given to developments which can viably and effectively serve individuals with special needs (p. 29). ❖ Up to 6 points for serving people who have special needs. A service plan and memorandum of understanding with a service provider is required for homes that are intended for persons with special needs (37-38).
O3. Scoring to promote home ownership.	No
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Under federal law, individuals seeking housing may not be discriminated against based on their race, color, religion, sex, ancestral origin, familial status, or disability. State fair housing laws further extend protections against housing discrimination on the basis of marital status, sexual orientation, age, gender identity or expression, veteran status, and status as a victim of domestic abuse, or by reason of association with members of any of these protected classes. (p. 22) ❖ The owner of every project that has received LIHTCs must submit an Annual Certification of Continuing Program Compliance and evidence of Certification of LIHTC training including, whether for the preceding 12-month period: All units in the project were for use by the general public, including the requirement that no finding of discrimination under the Fair Housing Act occurred in the project (p. 56)
Change since 2015?	A5, A7, F1/F2

QAP (2022): <https://www.rihousing.com/wp-content/uploads/RIHousing-2022-Qualified-Allocation-Plan.pdf>

OVERALL ASSESSMENT:

TOTAL POINTS POSSIBLE: 136. The QAP also notes that an applicant can get a total of 15 negative points, if possible (p. 34)

CHANGES SINCE 2015:

Previously evaluated QAP did not use a point system.

A5: RI Housing added a small point award for developments located in a high performing school district.

A7: Added a small point award for transportation and connectivity.

F1/F2: Added incentives for 3+ bedroom units and priority for projects serving households with children.

STATE: SOUTH CAROLINA (QAP 2022)	South Carolina State Housing Finance and Development Authority (SC Housing)
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<ul style="list-style-type: none"> ❖ Applications for new construction developments located within 1 mile of a 2021 or 2022 awarded new construction development posted on the Authority’s Proposed & Existing LIHTC Page will be disqualified (p. 9-10). ❖ The Authority will not award more than two 1 new construction applications per county that received an award of tax credits in the prior year and will not award more than two (2) new construction applications per county in all other counties (p. 17-18). <p>For purposes of this QAP, counties fall into one of two groups:</p> <ul style="list-style-type: none"> • Group A: Aiken, Anderson, Beaufort, Berkeley, Charleston, Dorchester, Georgetown, Greenville, Horry, Jasper, Lancaster, Lexington, Richland, Spartanburg, and York • Group B: Abbeville, Allendale, Bamberg, Barnwell, Calhoun, Cherokee, Chester, Chesterfield, Clarendon, Colleton, Darlington, Dillon, Edgefield, Fairfield, Florence, Greenwood, Hampton, Kershaw, Laurens, Lee, Marlboro, Marion, McCormick, Newberry, Oconee, Orangeburg, Pickens, Saluda, Sumter, Union, and Williamsburg (p. 20).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ [New Construction] 5 points for not being located, in whole or in part, in a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as defined by HUD (p. 24). ❖ [New Construction] 5 points to a project that is located in a county that did not receive a new construction 9% LIHTC award

	<p>in the previous 5 years (2017, 2018, 2019, 2020, or 2021, 2022); or 3 points to a project that is located in a county that did not receive a new construction 9% LIHTC award in the previous 3 years (2020, 2021, 2022) (p. 26).</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ 10 points for affordability: In order to receive points, the application must reflect one set-aside election (average income or “original” minimum set-aside (i.e., 40% at 60% or 20% at 50%)) and meet the criteria below for the selected set-aside. For average income, the percent shown is the average AMI among the units’ designations. For an original minimum set-aside (40% at 60% or 20% at 50%), at least 20% of the units must be affordable to and occupied by households at the AMI shown [see notes] (p. 25).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ [Threshold Requirement] The surrounding area must be residential or a mix of commercial uses appropriate to the targeted tenants (p. 9). ❖ [New Construction] Up to 26 points for projects in proximity to Primary Amenities (grocery, shopping, pharmacy). Points award increase as driving distance decreases, with the fewest points awarded for driving distance of 3 miles (p. 22). ❖ [New Construction] Up to 15 points for projects in proximity to Secondary Amenities (second grocery, pharmacy or pharmacy; services—restaurant, bank/credit union, or gas station with convenience store; healthcare; public facility; public school; senior center; retail) (p.23). ❖ [New Construction] Up to 10 points based on the number of jobs paying between \$1,251 and \$3,333 per month in a one-mile radius for Group A counties and a two-mile radius for Group B (2 points for 1,000-1,999

	<p>jobs and 2 additional points for each additional 1,000 jobs) (p. 24).</p> <ul style="list-style-type: none"> ❖ [New Construction] 5 points for being located entirely within a Qualified Opportunity Zone (QOZ) (p. 24).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ [New Construction—Family projects only] Public schools included in points for proximity to Secondary Amenities. Up to 3 points (p. 23-4).
<p>A6. Scoring that discourages development in distressed neighborhoods.⁸⁴</p>	<p>(+) The Authority may disqualify new construction applications sited near detrimental characteristics:</p> <ul style="list-style-type: none"> • Sites where a nearby active railroad causes excessive noise and vibration (The application should include a map showing the distance to any railroad tracks within 1,000 feet); • Sites within 2,500 feet of a civil airport or 15,000 feet of a military airfield if the site is located within the Runway Clearzone or Protection Zone (civilian and military airports) or Accident Potential Zone (military airports); • Sites within 1/4 mile of the following: an operating commercial beef/hog/chicken/turkey farm or processing plant; a treatment, storage, or disposal facility for hazardous wastes, an active or inactive solid waste disposal facility and/or solid waste transfer facility; or a sewage treatment plant; • Sites within 500 feet of the following: commercial junkyard or salvage yard; trash heap, dump pile, or other eyesore; above ground commercial bulk storage (any one tank over 1,500 gallons or multiple tanks exceeding 1,500 gallons total) or distribution facilities for propane/butane gas, hazardous chemical or petroleum/gasoline; adult video/entertainment clubs and stores; or operating industrial facility, including but not limited to steel manufacturers, oil refineries, ports, chemical plants, plastic

⁸⁴ 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.

	manufacturers, automotive and engine parts manufacturers, food processing plants (p. 10).
A7. Scoring or requirements that preference siting near mass transit.	No.
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ [New Construction] Up to 10 points for meeting the requirements for a community revitalization plan (CCRP) (see notes) (p. 27). ❖ [Rehabilitation] 1 point if the project development is located within an area covered by a Concerted Community Revitalization Plan (p. 29).
B1. Local participation in site selection is limited to statutory minimum. ⁸⁵	<ul style="list-style-type: none"> ❖ (-) The applicant must provide signed notification letter(s) addressed to the following: the highest official of the locality (i.e. Mayor or County Administrator), the State Representative and State Senator of the district in which the development is to be located, and each City/County Council member. Letters must include a statement offering to meet and discuss the proposed development (p. 22). ❖ (-) [New Construction] 5 points if a local government owns the proposed project real estate as of the preliminary application deadline and the application shows no more than \$5,000 in the cost line-items for land and buildings. The local government must have owned the real estate since at least July 31, 2021 2022 and not have purchased or received any portion from a Principal (p. 25).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold] Applications must include a statement agreeing to adopt and implement an Affirmative Fair Housing Marketing Plan, including outreach, marketing and advertising methods used to attract individuals on public housing waiting lists, prior to placing in service (p. 4).

⁸⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

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.	<ul style="list-style-type: none"> ❖ Required Affirmative Fair Housing Marketing Plan must include methods used to attract individuals on public housing waiting lists (p. 4). See C2. ❖ All developments must serve individuals on Public Housing agency waitlists. After award, the Owner must send a letter to the PHA confirming it intends to serve individuals on the PHA waiting lists (p. 11).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ Projects must target either families or older persons. For Family Developments, at least 25%) of the low-income units must contain 3+ bedrooms and 10% must be 1 bedroom, studio, or single room occupancy (p. 11).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	No.
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ [New Construction] 5 points for agreeing to target 10% of the total units to persons with disabilities and either: designating such units as affordable to and occupied by 20% AMI, or securing a commitment of federal project-based rent assistance (converting vouchers) (p. 28).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Projects must target either families or older persons. Older Person Developments are limited to studios, 1 bedroom or 2 bedroom units and must be accessible by elevator for all floors above ground level (p. 11).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 4th tiebreaker: Projects providing for tenant ownership at the end of the initial 15 year compliance period. The application must include a conversion plan including all homebuyer counseling programs to be

	provided along with the financial procedure that will be used to transfer the rental units into homeownership (p. 29).
O4. Provisions affirmatively furthering fair housing laws.	❖ [New Construction] 5 points if the application includes a letter detailing measures already implemented by the local government to increase the quantity of affordable housing and develop a resilient community. Examples of policies include “any activities that affirmatively further fair housing” (p. 28).
Change since 2015?	A1; A2; A4a; A4b; A8; C1; C2; D1; F2; G1; O2; O4

DRAFT QAP (2023): <https://www.schousing.com/library/Tax%20Credit/2023/2023-Draft-QAP-20221019.pdf>

- Still pending required final approval as of 3/22/23.

NOTES:

Set aside categories include: High-Demand New Construction—New construction projects located in a Group A county (35-45%); Rehabilitation (15-20%); General New Construction—New construction projects located in a Group B county (25-30%); Innovation (0-5%) (p. 20-21).

If necessary, the Authority may adjust the allocations of awards of the state’s federal tax credit ceiling under the QAP to award projects involving tax-exempt organizations (nonprofits). The Authority may adjust such awards to allow up to approximately ten percent (10%) of the state’s federal tax credit ceiling being awarded to such projects (p. 21)

Affordability matrix [A4a]:

County Income Level	MINIMUM SET-ASIDE ELECTION	
	Average Income	Original
High	54%	30%
Moderate	56%	40%
Low	58%	50%

A CCRP must meet the following minimum requirements to receive at least 5 points:

- The plan was published by a local planning department or community organization. Plans written by the applicant or an affiliate will not qualify.
- The plan clearly delineates the community (in which the proposed development is located) for reinvestment. A plan for a large jurisdiction (such as a city or county) that does not designate particular areas of that jurisdiction for targeted investment will not qualify.
- The plan details the sources and magnitude of committed resources.
- At least some of the planned investment is ongoing or has the necessary official permission to proceed. If not addressed in the CCRP, the application must include supporting documents.
- The plan clearly states the community’s goals and how they will be achieved.

A CCRP can receive up to 4 additional points depending on the extent to which it fulfills the following criteria: 1) Participation by the general public had a substantial impact during the entire planning process; 2) Federal, state, and local partners have been involved to leverage available funds and harmonize with other projects; 3) There was a detailed investigation into the community’s history, economics, and demographics. The local built environment and public services were assessed and plans made to improve them where necessary; 4) The plan accounts for how to avoid displacement, equitably benefit residents, create mixed income neighborhoods, the barriers to success and how they will be overcome. Investment will be sustained over an extended period and fund housing and non-housing developments. 1 additional point will be awarded if the proposed development is also located in a qualified census tract

CHANGES SINCE 2015:

A1: New provisions—SC Housing does not permit or limits (depending on distance) new construction LIHTC developments located near developments that received LIHTC awards in recent years.

A2: New provisions—points for not being located in R/ECAP, points for developments not located near developments that received LIHTC awards in recent years.

A4a: New provision—points for affordability.

A4b: Previous QAP’s small point award for compatibility with surrounding area is now a threshold requirement. New provisions—points for number of jobs paying \$1,251-\$3,333/mo. nearby; points for siting in QOZ.

A8: CCRP referenced in previous QAP only as a tiebreaker—SC Housing now awards points for meeting requirements of a CCRP.

C1/C2/D1: SC Housing removed the scoring incentivizing affirmative marketing to individuals on public housing waiting lists and added Affirmative Fair Housing Marketing Plan as a threshold criteria, including requiring that the plan include methods to market to individuals on public housing waiting lists.

F2: QAP no longer awards points to developments designating 100% of rental housing for families with children. Instead, projects are required to target either families or older persons (change from a point award to a requirement).

G1: SC Housing removed large point award for projects restricting rent and income of 25% of units to 50% AMI.

O2: Projects must target either families or older persons. No such requirement for targeting older persons in previous QAP.

O4: New provision—small point award for letter detailing measures by local government to increase quantity of affordable housing, including any activities that affirmatively further fair housing.

South Dakota: (QAP 2022-2023)	South Dakota Housing Development Authority
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	

<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>No</p>
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ All communities with two or more low-income housing projects under construction or in the process of rent-up (less than 90 percent occupied) may receive zero points in the LOCAL HOUSING NEED category (p. 26) ❖ 30 points maximum for developments consisting of low income and market-rate units. Points awarded will be based on the ratio of market-rate units total project units: <ul style="list-style-type: none"> • 10 points: 5-10% Market Rate • 20 points: 10.01-20% Market Rate • 30 points: 20.01-49.99% Market Rate (p. 28)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 40 points for projects located in close proximity (within ½ mile of the property) of community services and areas of opportunity. Community services include, but are not limited to: <ul style="list-style-type: none"> • Grocery/retail stores • Hospital/medical clinics • Schools/senior center • Special service offices (p. 30) ❖ 20 points if the project is located in an Area of Opportunity: <ul style="list-style-type: none"> • Low Poverty Census Tracts – less than 10% poverty rate • High Ratio of Jobs to Population – above the state average ratio • Below average unemployment – less than the state unemployment rate • High Scoring Schools – above average school performance index posted by the South Dakota Department of Education (p. 30-31)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ [See A4b] High Quality Schools is a criterion of “Area of Opportunity” (p. 31)

<p>A6. Scoring that discourages development in distressed neighborhoods.⁸⁶</p>	<ul style="list-style-type: none"> ❖ If any detrimental site characteristic exists on, or adjacent to the site, SDHDA may reject the application. Detrimental characteristics may include but are not limited to: location within one mile of pipelines, storage areas for hazardous or noxious materials, sewage treatment plant, or sanitary landfill; location within 2,500 feet of an airport runway clear zone; 3,000 feet of a railroad, 1,000 feet of a major roadway, commercial property, or 15,000 feet of military clear zone; physical barriers; unsuitable slope or terrain; location within 1,000 feet of registered historic property; or location in flood hazard area (p. 23-24) ❖ For those projects which combine tax credits and other HUD assistance, SDHDA must perform a subsidy layering review (p. 25) ❖ Up to 25 points for projects that leverage a larger percentage of non-SDHDA financing (HOME): <ul style="list-style-type: none"> • 5 points: 84.99% to 80.00% • 10 points: 79.99% to 75.00% • 15 points: 74.99% to 70.00% • 20 points: 69.99% to 65.00% • 25 points: 64.99% and lower (p. 29)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 20 points for a project that has a bus stop within one city block or provides free transportation to the tenants on a regularly scheduled (minimum 4 times a week) or on-call basis (p. 30) ❖ Projects that have on-call transportation services provided to tenants at reduced rates may receive 10 points (p. 30)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 20 points maximum for projects that are located within a QCT and that contribute to a Concerted Community Revitalization Plan that is documented at the time of the application (p. 28)

⁸⁶ 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.

B1. Local participation in site selection is limited to statutory minimum. ⁸⁷	❖ Written evidence of financial and local support must be provided (p. 36)
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.	❖ Up to 10 points for a proposal which provides a written commitment to notify local public housing agencies of vacancies and give priority to households on waiting lists of those agencies (p. 31)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	❖ Applications must include certification from the applicant that the local PHA has been notified of the proposed project in their service area. The certification must also give priority to households on the PHA waiting list in order to obtain points under D1 (p. 34)
F1. Incentives for larger family units.	No
F2. Incentives targeting families/families with children	See O2 ❖ Up to 10 points for projects that will be serving tenant populations of individuals with children and provide written documentation at time of application (p. 31)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Up to 75 points for Deep Income Targeting: To receive points for deep income targeting, a project must set the following rent limits for each target AMI in addition to the 20% FMR requirement: <ul style="list-style-type: none"> • 25 points: A proposal which elects to set aside an additional 10% of the rent restricted units for households not exceeding 50% of AMI • 25 points: a proposal which elects to set aside an additional 7% of the rent restricted units for households not exceeding 40% of the AMI • 25 points: A proposal which elects to set aside an additional of 3% of the rent restricted units for households

⁸⁷ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	not exceeding 30% of the AMI (p. 26-27)
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	See O2
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Up to 40 points for projects providing verifiable on-site services to tenants. Including, but not limited to: Homeless persons, persons with physical disabilities, persons with mental disabilities, persons with developmental disabilities, housing for Older Persons, Families with children (p. 29)
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ Projects involving tenant ownership must submit to SSDHDA a long-term management plan which must include home buyer counseling programs for the tenants (p. 18) ❖ Up to 20 points for projects intended for eventual tenant ownership (p. 28)
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Compliance] The owner and/or the management company must attend Fair Housing training at a minimum of once every three years beginning prior to the issuance of IRS Form(s) 8609 through the compliance period (p. 11) ❖ All housing for which tax credits are received must be available to all persons regardless of race, color, national origin, religion, creed, sex, disability, or familial status (p. 18) ❖ It is the owner's responsibility to be aware of and comply with Fair Housing and all nondiscrimination provisions relating to the race, color, religion, creed, sex, disability, familial status, and national origin. This includes design requirements for construction or rehabilitation, Equal Opportunity in regard to marketing and tenant selection and reasonable accommodation and modification (p. 23)

Change since 2015?	A2; A4b; A5; A6; A7; D2; O1; O2; O3

QAP 2022-2023:

<https://static1.squarespace.com/static/62043c6fe162bf3ffdc5f475/t/63c1b7d42f750a2c45077041/1673639893066/QAP+Plan+--+Final.pdf>

NOTES:

Non-Profit Set-Aside: IRC requires that a minimum of 10% of the total annual housing tax credits available be set aside for projects involving nonprofit organizations. The nonprofit entity must own at least 10% of all general partnership interests in the development

Indian Reservation Set Aside: Up to 20% of the total annual housing tax credits available will be set aside for the highest scoring project located on tribal land, either held in trust or fee simple, and within the exterior boundaries of an Indian Reservation

LOCAL HOUSING NEED: All applicants must submit a complete market analysis addressing the local housing needs that is no more than six months old (See Section VIII.A.1. regarding submission requirements and Exhibit 2). The applicants considered to be facing the highest overall need will receive the highest score. All other applications will be ranked against the highest scoring applicant. Each applicant will receive from 0 to 150 points depending upon identified need. When determining the need, SDHDA may take into consideration including but not limited to the need for additional housing units in the community, the physical condition of the proposed project, the need of SDHDA funding sources to retain the proposed project, retention of existing project based rental subsidies, and the degree of rehabilitation necessary depending on the proposed project activity. All communities with two or more low income housing projects under construction or in the process of rent-up (less than 90 percent occupied) may receive zero points in this category.

TOTAL POINTS POSSIBLE: Maximum Possible Points: 1000. Applications must obtain a minimum of 400 points to be considered for funding. Applications that do not receive this cumulative total will be denied and the applicant will be notified of such denial

CHANGES SINCE 2015:

- **A2:**
 - QAP now includes provisions discouraging multiple LIHTC developments in a single area.
 - The QAP also now includes a provision incentivizing mixed-housing developments
- **A4b:**
 - More points now allocated for projects in close proximity to services
 - QAP now includes points for projects located in Areas of Opportunity
- **A5:** High quality schools is a criterion of Areas of Opportunity
- **A6:** Provision now specifies the number of points given to leveraging of non-SDHDA financing
- **A7:** QAP now gives points for proximity to consistent public transportation
- **D2:** Applications are required to include certification that the local PHA has been notified of the project and given priority in housing
- **O1:** QAP is less explicit about disability requirements for units
- **O2:** More points allocated toward supportive services
- **O3:** Fewer points allocated to projects intended for eventual tenant ownership

STATE: TENNESSEE (QAP 2023)	Tennessee Housing Development Agency (THDA)
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Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>[New Construction] THDA will make the first award to the highest scoring application, regardless of which regional pool it is in. Whichever regional pool this awarded application is in is ineligible for any further awards until an award has been made to each of the remaining regional pools with submitted applications. THDA will make the next award to the next highest scoring application that is not in the same regional pool as the 1st application chosen, and this regional pool is then ineligible until an award has been made to each of the remaining regional pools with submitted applications. This process continues through 4 regional pools. After credits are awarded in all pools in which an application has been submitted, the remaining applications in all pools become eligible again, and the process repeats (p. 55-56).</p> <ul style="list-style-type: none"> ❖ No more than 25% of the Competitive Housing Credit Ceiling will be allocated to developments that include rehabilitation of Existing Multifamily Housing (p. 13).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<p>No.</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<p>No.</p>
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<p>No.</p>
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>No.</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁸⁸</p>	<p>No.</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No.</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ CNI Grant Set-aside: Eligible PHAs with qualified CNI grants may receive an allocation of Housing Credit outside of the PHA Set-Aside [see notes] (p. 13).

⁸⁸ 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.

	<ul style="list-style-type: none"> ❖ [Rehabilitation] 2 points for a development site wholly located within a HUD–defined QCT covered by a CCRP (p. 45). ❖ 5 points for rehabilitating Existing Multifamily Housing in an area covered by a CCRP (p. 46). ❖ [New Construction] Second tiebreaker— priority is given to the proposed new construction development located wholly within a QCT and covered by a CCRP (p. 56).
B1. Local participation in site selection is limited to statutory minimum. ⁸⁹	<ul style="list-style-type: none"> ❖ (-) Adverse Action by Local Jurisdiction: If, following the allocation of Housing Credit to a proposed development, the local jurisdiction in which the proposed development is located takes action that THDA, in its sole discretion, determines to be for the primary purpose of preventing the proposed development from satisfying applicable program requirements, THDA may lower the amount of Housing Credit available to that jurisdiction in future Qualified Allocation Plans (p. 2).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Applications must include a certificate that Owner will comply with Affirmatively Furthering Fair Housing Marketing requirements and provide THDA its Marketing Plan in its Carryover Allocation Application (p. 34). ❖ As part of Annual Certification of Compliance, Owners shall certify, under penalty of perjury, by the deadline established by THDA, that, for all times during the prior calendar year... the units were leased according to the Owner’s THDA-approved Affirmatively Furthering Fair Housing (“AFFH”) Marketing Plan (p. 64).
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.	<ul style="list-style-type: none"> ❖ 1 point to developments which have marketing plans, lease-up plans, and operating policies and procedures which will give a priority to persons on current Public Housing waiting lists

⁸⁹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>or who have been approved for an HCV pending identification of a unit (p. 41, 50).</p>
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ As part of annual compliance monitoring owner must show an extended low-income housing commitment was in effect, including the requirement that an owner cannot refuse to lease a unit in the project to an applicant because the applicants holds a voucher under Section 8 (p. 65).
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ Points for Serving Resident Populations with Children includes requiring 20% of units to have 3+ bedrooms (p. 42). See F2.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 5 points (New Construction) or 7 points (Rehabilitation) for Serving Resident Populations with Children. Applications electing these points must indicate a residency preference for households with children and 20% of units must contain 3+ bedrooms. Also requires an onsite playground and 1-2 additional on-site amenities listed (p. 42, 50-51). [Developments cannot apply for these points and for those for Serving Resident Populations with Special Needs. See O2].
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ An objective of the QAP is to make rental units affordable, in the areas of greatest need, to households with as low an income as possible and for the longest time period possible (p. 1). ❖ [New Construction] Up to 6 points for setting aside an additional percentage of units for HH's with incomes no higher than 50% AMI (for 40/60 test) and 40% AMI (for 20/50 test). Average Income Test applications not eligible for these points (p. 37).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<ul style="list-style-type: none"> ❖ Owners shall submit, not less than annually, information concerning the race, ethnicity, family composition, age, income, use of rental assistance under Section 8(o) of the United States Housing Act of 1937 or other similar assistance, disability status, and monthly rental payments of households residing in the development in a form, with substance, and with timing as THDA may require (p. 67).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ An objective of the QAP is to encourage development of appropriate housing units for

	persons with special needs, including individuals who have a disability (p. 1).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ An objective of the QAP is to encourage development of appropriate housing units for persons with special needs, including individuals who are older persons or homeless (p. 1). ❖ 5 points (New Construction) or 7 points (Rehabilitation) for Serving Resident Populations with Special Housing Needs. Requires Supportive Services Agreement; dedicated space relevant to the population; 1-2 additional amenities listed (p. 40-41, 49). [Developments cannot apply for these points and for those for Serving Resident Populations with Children. See F2].
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ 3 points (New Construction) or 5 points (Rehabilitation) for developments intended for eventual tenant ownership. Applicants offering qualified residents the right of first refusal to purchase single family Housing Credit buildings at the end of the 15 year Compliance Period shall include a detailed plan specifically including how the Owner will set aside a portion of the rent beginning in year 2 of the Compliance Period to provide sufficient funds to the resident at the end of the Compliance Period for the down payment and closing costs to purchase the unit (p. 43, 51).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Applications must Comply with the Fair Housing Act, as applicable (p. 33). ❖ As part of annual compliance monitoring, owners must show that all units in the project 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. 64).
Change since 2015?	A1; A2; A8; F1/F2; G1; O1/O2

QAP (2023): <https://thda.org/pdf/2023-QAP-CORRECTED-02.02.2023-FOR-WEB.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 100. A minimum of 65 points is required for consideration.

Set-asides: non-profit (no less than 10%), CNI Grants (shall not exceed \$1.7m), Economic Development area (no more than \$3m), PHA (no more than 25%), rehabilitation of Existing Multifamily Housing (no more than 25%), New Construction (up to 50%) (p. 13).

Basis Boost of no more than 30% available to all applicants and awarded at THDA’s discretion (p. 15).

4 points to developments located in a county/municipality with a [growth plan approved by the local government planning advisory committee](#) as determined by the TN Advisory Commission on Intergovernmental Relations. The Commission requires local officials within each of the 92 non-metropolitan counties to work together to shape growth policy through the development of 20-year growth plans. The Act did not impose a single, statewide solution. It did, however, include five statements of legislative intent: to eliminate annexation or incorporation out of fear; to establish incentives to annex or incorporate where appropriate; to more closely match the timing of development to the provision of public services; to stabilize each county's education funding base and establish an incentive for each county legislative body to be more interested in education matters; and to minimize urban sprawl (p. 43).

CHANGES SINCE 2015:

A1: THDA no longer restricts allocation of tax credits to developments located completely and wholly within a QCT to no more than 50%.

A2: QAP no longer awards points to developments in counties identified as having the highest housing need (as calculated by amount of prior LIHTC allocation).

A6: QAP no longer requires that developments proposing projects in the Existing Multifamily Housing set aside have existing income or rent restrictions.

A8: THDA no longer reserves 10% of tax credits to projects in a QCT that are covered by a CCRP. Proposals with CNI Grants now have their own set-aside (as opposed to priority within the PHA set-aside)

F1/F2: Point award for serving HH’s with children reduced from 20 to either 5 (New Construction) or 7 (Rehabilitation). Strong positive ranking is now moderate/weak positive.

G1: Large point award for developments that reserve ≥20% of total units to HHs with incomes ≤50% of AMI with rents maintained ≤50% of AMI maximums has been removed.

O1/O2: Special Needs set-aside has been removed. Large point award for serving HH’s with special needs reduced from 20 to either 5 (New Construction) or 7 (Rehabilitation). Strong positive ranking is now moderate/weak positive. QAP now contains a positive preference for developing units for persons with special needs, stating clearly that development of such units are an objective of the QAP.

STATE: TEXAS (QAP 2022)	Texas Department of Housing and Community Affairs
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	Two Mile Same Year Rule: THDA will not award tax credits to a development with a proposed site in the same county (with pop. higher than 1 million) within two miles of a development with tax credits awarded

	<p>in the same calendar year (does not apply in federal disaster area) (p. 35).</p> <p>Twice the State Average Per Capita: if a proposed development is located in a municipality (or if not in a municipality, a county) that has more than twice the state average of tax credit-supported units, the applicant must obtain approval of the local government in which the proposed development will be located (p. 36). [Also relates to B1]</p> <p>One Mile Three Year Rule: THCDA will not award tax credits to a development located within one mile of a development that serves the same target population and has received tax credits within 3 years. County must have population over 1 million and be within a metropolitan statistical area. Local government may vote to permit construction (p. 36).</p> <p>Developments may not be sited in census tracts that have more than 20% tax credit units per total households (unless the development is approved by the local government) (p. 37).</p> <p>Developments located in a county with population <1 million may not be approved if another development serving the same population is within 1,000 feet (p. 37).</p> <p>Only one application per census tract may be awarded tax credits in an urban subregion (p. 38).</p> <ul style="list-style-type: none"> ❖ Second tiebreaker: Applications proposed to be located the greatest linear distance from the nearest Housing Tax Credit assisted Development that serves the same Target Population and that was awarded 15 or fewer years ago (p. 52).
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ 4 points if the development is located entirely within a census tract that does not have another Development that was awarded 30 or fewer years ago. 3 points for 15 or fewer, 2 points for 10 or fewer years (p. 68). ❖ 5 points if the Development Site is located entirely within a census tract that is located wholly within the perimeter formed by the outermost boundaries of an incorporated

	<p>area and the census tract itself and all of its contiguous census tracts do not have another Development that was awarded 10 or fewer years ago (p. 69).</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ First tiebreaker: preference goes to developments proposed in a census tract with poverty rate <20%. (<25% in the South Texas Border Region and <35% in the Upper Rio Grande Region) (p. 51). ❖ 4 points if The Development Site is located entirely within a census tract where, according to ACS 5-year Estimates, the population share of persons below 200% federal poverty level decreased by 10% or more and where the total number of persons at or above 200% federal poverty level had increased by 15% or more between the years 2012 and 2019 (p. 69). ❖ Neighborhood Risk Factor (see notes): The Development Site is located within a census tract that has a poverty rate above 40% for individuals (or 55% for Developments in regions 11 and 13) (p. 92). ❖ (-) Rehabilitation Developments are exempt from the above Neighborhood Risk Factor (p. 92).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Developments meeting the criteria for the Opportunity Index are eligible for a 130% basis boost (p. 40). ❖ Up to 7 points for location in high opportunity areas—If located entirely within a census tract with a poverty rate <20% or the median poverty rate among tracts for the region, whichever is greater, and either has a median household income in the two highest quartiles among Census tracts within the subregion (2 pts) OR has a median household income in the third quartile among Census tracts within the region, and is contiguous to a census tract that is in the first or second quartile among tracts for median household income in the region, and has a poverty rate

<20% or the median poverty rate among tracts for the region, whichever is greater, and the Development Site is no more than 2 miles from the boundary between the census tracts (1 pt); additional points if the above conditions are met and the development is located in an Urban area: within ½ mile of a public park (1 pt), public transportation stop or station (1 pt, plus 1 more pt if scheduled service arrives every 15 mins 7 days a week); within 2 miles of a grocery store or pharmacy (2 pts each), a public library, indoor or outdoor recreation facility, or community/civic/service organization that provides regular and substantive services (1 pt each); within 3 miles of a daycare (1 pt); within 4 miles of health-related facility (1 pt); in a census tract with property crime rate of 26/1000 or less (1 pt); within 6 miles of a university or community college (1 pt); in a census tract where 27% or more of adults age 25+ have an Associate's degree or higher (1 pt); in the services area of Meals on Wheels or similar program (1 pt); located in the attendance zone of a public school rated A or B by TEA (1 pt). For Rural developments 5 miles for grocery store, pharmacy, health related facility, daycare, public library, public park; 4 miles for indoor or outdoor recreation facility, community/civic/service organization that provides regular and substantive services; 15 miles for university or community college (p. 63-67).

- ❖ Up to 4 points for Proximity to Job Area. For Urban areas: within 2 miles of 10,000 jobs (4 pts), 8,000 jobs (3 pts), 6,500 jobs (2 pts), 4,500 jobs (1 pt). Rural areas: within 4 miles of 8,000 jobs (4 pts), 6,000 (3 pts), 4,000 (2 pts), 2,000 (1 pt). If the development qualifies for at least 2 points above, it may qualify for up to 2 additional points if the Development Site is within ½ mile from the entrance of a public transportation stop or station with a route schedule that provides regularly scheduled service to employment and basic services (p. 70).

<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ 1 point under opportunity index to developments located in the attendance zone of a general enrollment public school rated A or B by TEA (p. 66). <p>Neighborhood Risk Factor (see notes): The Development Site is located within the attendance zone of an elementary school, a middle school or a high school that has a TEA Accountability Rating of "Not Rated: Senate Bill 1365" for 2022 (p. 92).</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁹⁰</p>	<ul style="list-style-type: none"> ❖ (-) Basis boost (130%) available to developments located in a QCT that has <20% housing tax credit units per total households (p. 39). ❖ (-) Basis boost (130%) available to developments located in a Small Area DDA (p. 40). ❖ (-) At least 15% of tax credits must be set-aside for At-Risk development (p. 42). ❖ (-) Developments in urban subregions located in a neighborhood which is a recipient of a HUD Choice Neighborhood grant within the last 5 years receives 4th priority in initial application selection (p. 48). ❖ (-) 1 point under Underserved Area for a development located entirely within the boundaries of an Economically Distressed Area that has been awarded funds by the Texas Water Development Board in the previous five years (p. 68). ❖ (-) 3 points under Underserved Area for an At-risk or USDA Development placed in service 25 or more years ago, that is still occupied, and that has not yet received federal funding, or LIHTC equity, for the purposes of Rehabilitation for the Development (p. 69). ❖ The following are Undesirable Site Features. Development Sites located: within 300 feet of

⁹⁰ 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>junkyards; solid waste facility, sanitary landfill, or illegal dumping sites; sexually-oriented businesses. Within 500 feet of active railroad tracks (unless commuter/light rail) or heavy industry. Within 10 miles of a nuclear plant. Sites in which the buildings are located within the accident potential zones or the runway clear zones of any airport. Sites that contain one or more pipelines which carry highly volatile liquids. Within 2 miles of refineries capable of refining >100,000 barrels of oil daily (p. 88-90). [This section identifies specific requirements and restrictions related to a Development Site. It appears that violating these restrictions results in loss of eligibility, but it's not clear.]</p>
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 1 point under opportunity index to developments located within ½ mile of public transportation stop or station. 1 additional point if scheduled service arrives every 15 mins 7 days a week (p. 63). ❖ 2 additional points under proximity to jobs if the Development Site is within 1/2 mile from the entrance of a public transportation stop or station with a route schedule that provides regularly scheduled service to employment and basic services (p. 70).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 130% basis boost is available to developments located in an area covered by a concerted community revitalization plan, not an elderly development, and not located in a QCT (p. 40). ❖ Developments that are part of a concerted revitalization plan, are located in an Urban subregion, and are within a municipality with pop. >500,000, receive second priority in initial application selection (p. 47). ❖ Up to 7 points for locating the development within an area covered by a concerted community revitalization plan. 5 points if the development is not within a QCT (p. 79).

<p>B1. Local participation in site selection is limited to statutory minimum.⁹¹</p>	<p>[Threshold Requirement] Developments are required to notify municipal and county officials of their applications (p. 54).</p> <ul style="list-style-type: none"> ❖ (-) Up to 17 points for a resolution from the Governing Body of a county or municipality expressly setting forth that the county/municipality supports the Application or Development. 14 points for a resolution from the Governing Body of a county or municipality expressly setting forth that the county/municipality has no objection to the Application or Development (p. 71). ❖ (-) 1 point for a commitment of development funding by the local political subdivision (p. 72). ❖ (-) Local participation—letters: Only gives points for statements of support or neutrality (from Neighborhood Org.), and 0 points for opposition. If no qualifying Neighborhood Organizations, letters in opposition can result in a point subtraction for each letter. Includes from a community or civic organization that serves the community in which the Development Site is located; property owners association created for a master planned community whose boundaries include the Development Site (p. 72). ❖ (-) Mitigation for the Neighborhood Risk Factor in A6 may include a resolution from the Governing Body of the appropriate municipality or county containing the Development, acknowledging the high poverty rate and authorizing the Development to move forward (p. 94).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ [Not located in QAP] A Development Owner with five or more total Units must affirmatively market the Units to promote equal housing choice for prospective tenants, regardless of race, color, religion, sex, national origin, familial status, or disability and must develop and carry out an

⁹¹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	Affirmative Fair Housing Marketing Plan (or Affirmative Marketing Plan) to provide for marketing strategies and documentation of outreach efforts to prospective applicants identified as "least likely to apply" 10 TAC §10.801(b).
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentivizes language access and marketing to non-English speakers.	❖ 3.5 points for 4 hours of weekly classes on site (examples include ESL classes) (p. 111).
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.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 2 or 4 points for children’s playscapes. 5 points for swimming pool. 3 points for splash pad/water feature play area (p. 104-5). ❖ 2-4 points for providing a High Quality Pre-Kindergarten (HQ Pre-K) program and associated educational space at the Development Site (p. 111). ❖ 3.5 points for twelve hours of weekly, organized, on-site services provided to K-12 children by a dedicated service coordinator or third-party entity. Services include after-school and summer care and tutoring, recreational activities, character building programs, mentee opportunities, test preparation, and similar activities that promote the betterment and growth of children and young adults (p. 111).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Developments which restrict 10% of the proposed low income units for HH’s at or below 30% AMGI are eligible for 130% basis boost (p. 40).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	Supportive Housing eligibility for basis boost includes for persons with physical, intellectual, and developmental disabilities. See O2.

	Points for serving Residents with Special Housing Needs includes for serving persons with a disability. See O2.
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ Developments that are entirely Supportive Housing are eligible for a 130% basis boost (p. 40). ❖ Elderly Developments receive first priority in initial application selection (p. 47). ❖ Developments may receive up to 3 points by serving Residents with Special Housing Needs—Commit 5% of total units to Residents with Special Housing Need (2 pts); If committing 5% of units, committing an additional 2% to referrals from local Continuum of Care or local homeless service providers (1 pt); 1 point if development is located in a county with pop. between 1-4 million, within two miles of a veteran's hospital, veteran's affairs medical center, or veteran's affairs health care center, and agrees to provide preference to low-income veterans (p. 62).
O3. Scoring to promote home ownership.	No.
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Under input from community organizations-- Input that evidences unlawful discrimination against classes of persons protected by Fair Housing law or the scoring of which the Department determines to be contrary to the Department's efforts to affirmatively further fair housing will not be considered (p. 78).
Change since 2015?	N/A

QAP (2023): <https://www.tdhca.state.tx.us/multifamily/docs/23-QAP-10TAC-Ch11.pdf>

- QAP is a promulgated rule at 10 TAC Chapter 11.

NOTES:

130% basis boost eligibility (beyond those listed above) also includes Rural Area developments and developments located in a Qualified Opportunity Zone (p. 40).

Set-asides include: Nonprofit (10%); Rural Developments financed through USDA (5%); and At-Risk (15%) (p. 41-45).

Affirmative Marketing Requirements are not located in QAP. These are in [10 TAC Chapter 10, Subchapter G](#).

Neighborhood Risk Factors: Applicant must disclose the presence of these characteristics in the Application submitted to the Department. The presence of any of these characteristics will prompt staff to perform an assessment of the Development Site and neighborhood, which may include a site visit, and include a review. In order to be considered an eligible Site despite the presence of Neighborhood Risk Factors, an Applicant must demonstrate actions being taken that would lead staff to conclude that there is a high probability and reasonable expectation the risk factor will be sufficiently mitigated or significantly improved prior to placement in service and that the risk factor demonstrates a positive trend and continued improvement. Conclusions for such reasonable expectation may need to be affirmed by an industry professional, as appropriate, and may be dependent upon the severity of the Neighborhood Risk Factor disclosed (p. 91-92)

Uniform State Service Regions: <https://www.tdhca.state.tx.us/multifamily/docs/09-RefMan-UniformStateSvcRegions.pdf>

CHANGES SINCE 2015:

Texas’s QAP was not evaluated as part of the Building Opportunity II report.

UTAH: (QAP 2022-2023)	Utah Housing Corporation
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ If more than one project is submitted in the same non-metro community and the market studies of all the projects do not support the building of more than one Housing Credit project in that community, only the highest scoring project will be awarded credits (p. 25)
A2. Scoring that discourages racial and economic concentration.	❖ 5 points if the project is located in a “Non-Participating Area,” meaning the project is the first housing credit restricted project in the county OR the first housing credit project in the municipality OR the first housing credit project on a tribal reservation (p. 54)
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.	❖ 5 points for projects located in an Area of Opportunity. Points are based on the Opportunity Index Score (school proficiency, job access, labor market engagement, poverty and housing stability) and Poverty Rate (p. 54, p. 137) ❖ 2 points for a project within 1/3 mile to a public park that has been designated as a green space for public use by a

	<p>governmental entity or deed restriction. Distance will be measured using the shortest walkable route along public access (p. 56)</p>
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ School proficiency is included as a component of the Opportunity Index Score, but is not defined in the QAP (p, 137) ❖ 2 points for projects with 3+ bedroom units that are located within 1/3 mile of a public school (p. 56)
<p>A6. Scoring that discourages development in distressed neighborhoods.⁹²</p>	<ul style="list-style-type: none"> ❖ [Threshold] Projects will be able to claim a 130% increase in Eligible Basis if located in a HUD-designated QCT or DDA (p. 26) ❖ Pursuant to federal regulations, UHC shall conduct financial subsidy reviews (Subsidy Layering Review) on projects that directly or indirectly receive financial assistance from the US Department of Agriculture Rural Development Service or HUD exclusive of HOME, CDBG, or HOPEWA assistance (p. 35) ❖ 10 points for substantial rehabilitation or preservation projects that maintain or reduce rent levels for all tenants (p. 58)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 5 points if the project is located within 1/3 mile of FrontRunner or TRAX OR bus stop along a core route OR 3 points if the project is located within 1/3 mile of a bus stop along a core route (see notes) (p. 54)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Preference given to projects which are located in QCTs and contribute to a Concerted Community Revitalization Plan area (p. 51) ❖ 5 points for projects that are part of a Concerted Community Revitalization Plan (p. 58)

⁹² 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.

B1. Local participation in site selection is limited to statutory minimum. ⁹³	No
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ [See O2] Applicant must provide a narrative outlining an active marketing plan for the units and the nature and extent of supportive services offered to tenants (p. 62)
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.	❖ Up to 10 points for service to tenants with public housing assistance. Applicant must provide a MOU between the applicant and the local PHA indicating willingness to accept tenant applications under the applicable program and restrictions, for those units not otherwise restricted under a project based rental assistant program such as Section 8 or USDA Section 515 (p. 63)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ 2 points for projects with 3-bedroom units <ul style="list-style-type: none"> • 1 point for a minimum of 10% of Housing Credit units • 1 additional point for 20% or more of Housing Credit units (p. 55) ❖ 1 point for 4+ bedroom units (10% or more of Housing Credit units) (p. 55)
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 1 point for projects that have a commercial grade outdoor tot lot or playground (includes safe play surface) (p. 56) ❖ 2 points for projects that have a day care facility, available for tenant use at no fee, fully staffed, licensed as required (p. 56)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ Preference given to projects which serve the lowest income tenants for the longest periods (p. 51)

⁹³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

- ❖ Up to 60 points for lower income targeting. Projects will receive no points for units above the 50% AMI level:
 - Mid Rent Range (40-45% AMI) maximum 60 points when targeting 60% of the restricted units
 - Low Rent Range (< 40% AMI) maximum 20 points for targeting 20% of the restricted units
 - Upper Rent Range (45-50% AMI), maximum of 20 points for 20% of the total restricted units on a scale from 0%-20%
 - Homeless units below 25% AMI score points in addition to points earned under this section (p. 52)

Points also available for projects electing the income averaging minimum set-aside:

- Mid Rent Range maximum 60 points when targeting 30% of the restricted units at 40% AMI and 30% of the restricted units at 50% AMI
- Low Rent Range maximum 20 points when targeting 10% of the restricted units at 20% AMI and 10% of the restricted units at 30% AMI
- Upper Rent Range maximum 20 points when targeting 6% of the restricted units at 60% AMI, 6% of the restricted units at 70% AMI, and 8% of the restricted units at 80% AMI
- Homeless units elected in Part D of Section 8 must be divided between 20% AMI and 30% AMI

- ❖ See A6 – points for rehabilitation or preservation projects which maintain or reduce targeted rents paid by all current tenants (p. 58)

<p>H1. Racial/demographic reporting requirements.</p>	<ul style="list-style-type: none"> ❖ The Housing and Economic Recovery Act of 2008 requires HUD to collect and report the following information for Housing Credit Tenants: Race; Ethnicity; Family composition; Age; Income’ Use of Section 8; Disability Status; Monthly rental payment (p. 71)
<p>OTHER CATEGORIES</p>	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<p>See O2</p> <ul style="list-style-type: none"> ❖ Up to 10 points for providing fully accessible units (2 points per unit). All multifamily housing is required to construct a minimum of 5% of its dwelling units as fully accessible. Points are awarded for the number of units above and over the 5% requirement (p. 61)
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] To encourage the development of Permanent Supportive Housing (PSH) projects. PSH targets people, particularly the homeless or chronically homeless, and those with psychiatric Disabilities, chronic health challenges, or other barriers to accessing or retaining stable housing, and provides robust supportive services to reduce instability in housing. All PSH units must be rent restricted at or below 35% AMI, and be supported with an operating subsidy. Projects competing in this pool must be 100% set-aside for households that meet the described criteria (p. 18) (see notes) ❖ Up to 10 points for providing low-income units to the following populations: Persons with disabilities, domestic violence, maturing foster children, refugees, veterans, other special needs units with written pre-approval by UHC (p. 62) ❖ Up to 10 points for projects that provide at least one unit at or below 25% AMI for homeless or chronically homeless persons. Evidence of contractual

	participation by a Nonprofit or government social Service Provider for referral of clients is required (p. 62)
O3. Scoring to promote home ownership.	❖ Projects intended for eventual tenant homeownership is listed as one of the selection criteria, but is not present elsewhere in the QAP (p. 51)
O4. Provisions affirmatively furthering fair housing laws.	<p>❖ Project owners participating in the Program are required to comply with federal and Utah fair housing laws, including project design and accessibility requirements to the extent applicable to a particular project. Discriminatory housing practices (e.g., refusing to rent any person because of race, color, religion, sex, disability, familial status, source of income or national origin) are prohibited (p. 8)</p> <p>❖ Exhibit 6D outlines the guidelines for Fair Housing (p. 120)</p>
Change since 2015?	A1; A4b; A6; F2; O2; O3

QAP 2022-2023: https://utahhousingcorp.org/pdf/2023_QAP_220502.pdf

NOTES:

Set-Aside Pools:

- A. Government and Non-Profit Homeownership Set-Aside: 5%
- B. Non-Metro Areas and Small Project Set-Asides: 10%
- C. Permanent Supporting Housing Set-Aside 30%
 - a. If a project incorporates PSH requirements, the Application must include:
 - i. Tenant selection policies describing the low-barrier selection criteria;
 - ii. MOU between Project owner and Service Provider(s) describing their expertise with providing services in PSH models, the planned delivery of services on- and off-site, and the staff capacity for providing ongoing case management.
 - iii. Budget for supportive services;
 - iv. Evidence of a 15-year commitment of project-based rent subsidies;
 - v. Sample vulnerability assessment tool; and
 - vi. A Service Provider Letter of Understanding (see Exhibit 6E) on Service Provider letterhead for each population type specified in the Application.
- D. Non-Profit Organization Set-Aside: 10%
- E. Acquisition/Rehab of Existing Units Set-Aside: 10%
- F. General Pool: 35%

A7: The distance from the project to transportation shall be measured using the shortest walkable route along public access from the nearest entrance/exit of the project’s site. All points along the public

portion of the route must be accessible on a paved walkway

TOTAL POINTS POSSIBLE: Utah’s scoring system is such that each provision has a minimum score and a maximum weighted score.

CHANGES SINCE 2015:

- A1: UHC expanded their discouragement of multiple LIHTC properties from 3 counties to a provision that disallows more than one LIHTC property in any community
- A4b: Points now awarded for projects located in an Area of Opportunity
- A6: Points no longer awarded explicitly for projects located in a DDA, but the same number of points are now given to substantial rehabilitation or preservation projects – although it is good that the purpose of the projects must be to maintain or reduce rent levels for all tenants
- F2: Additional point given to projects that have a commercial grade outdoor tot lot or playground
- O2: Permanent Supportive Housing Units is now a set-aside
- O3: No provision on tenant ownership, but it is listed as a selection criterion in the QAP

STATE: Vermont (QAP 2022-2023)	Vermont Housing Finance Agency
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ [Threshold Requirement] Projects must meet the Mixed-Income Threshold, which is: For projects under 20 units, no mixed-income requirement; Projects of 20 – 49 units, 5% of the units must be market rate; and Projects 50 units or over, 10% of the units must be market rate (p. 12).
A2. Scoring that discourages racial and economic concentration.	❖ Up to 2 checkmarks for developments that promote economic integration by providing units that are not income restricted or else restricted to households above 60% AMI and not included in eligible basis (p. 20). ❖ Projects that are in a town that has market need and demand but has no affordable housing of the type proposed will receive one checkmark (p. 21).
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.	❖ VHFA Board of Commissioners may take into account developments which can meet the goals of “moving to opportunity” especially in communities that are demonstrably not economically integrated and have

	<p>little or no affordable rental housing opportunities for lower income households in making its final decision for the award of Housing Credits (p. 5-6).</p> <p>See A8.</p>
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ⁹⁴	No.
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ Projects located within 0.5 miles of local fixed routes will receive two checkmarks. Projects located within 0.5 miles of a "commuter" or regional/interregional limited transportation will receive one checkmark. Projects served by a "Demand Response" or specialized transportation will receive one checkmark (p. 20).
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Projects must be developed in State designated downtowns, village centers, and neighborhood development areas [In VT, the State's program for designating downtowns, village centers, and neighborhood development areas is the program that is used to identify areas for community revitalization.] (p. 29)
B1. Local participation in site selection is limited to statutory minimum. ⁹⁵	<ul style="list-style-type: none"> ❖ (-) Letters of support from local officials and service providers submitted in connection with an application are encouraged and should be directed to VHFA staff (p. 8).
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.	<ul style="list-style-type: none"> ❖ No. Two checkmarks for existing projects that are federally subsidized and at-risk, but does not promote Section 8 voucher access in high-opportunity areas (p. 21).

⁹⁴ 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.

⁹⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	No.
F1. Incentives for larger family units.	No.
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Up to 4 checkmarks for providing at least 25% of the units as “Housing with Services” for the homeless or those at risk of homelessness. “At risk of homelessness” defined as an individual or family at or below 30% of AMI. (p. 18). ❖ Up to 3 checkmarks for projects with 20-25% of units at or below 30% of AMI (p. 19).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ All projects and units are required to meet the Universal Design Policy in addition to the Vermont Access Rules for being “adaptable” and “visitable” (p. 15).
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ [Threshold Requirement] Sponsors must submit a report demonstrating efforts to comply with VT Gov.’s EO 3-73, which aims for at least 15% of all publicly subsidized housing to be occupied by people who were formerly Homeless (p. 13). ❖ Projects that are age-specific for senior occupancy will receive 1 to 3 checkmarks, based on the robustness of the service package offered (p. 18). ❖ Up to 4 checkmarks for providing at least 25% of the units for housing for the homeless or those at risk of homelessness (p. 18). [see also G1]
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ One checkmark possible for projects with intended eventual tenant ownership (p. 21).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ Under all circumstances, the State is committed and obligated to ensure that any project funded, and those entities responsible for administering such funds, must affirmatively further fair housing, work towards overcoming illegal housing discrimination, and broaden housing options for all people (p. 5). ❖ All projects must submit a fair housing plan acceptable to VHFA (p. 10).

Change since 2015?	A1; A2; A3; A4b; A8; B1; D1; F2; G1; O1. Appears that the whole QAP rating system has changed
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2022-2023:

<https://www.vhfa.org//sites/default/files/2022%20Qualified%20Allocation%20Plan%20February%201%202021%20Signed.pdf>

OVERALL ASSESSMENT:

TOTAL POINTS POSSIBLE: The QAP does not specify a scoring system for project selection but rather uses “checkmarks” to evaluate projects for 9% LIHTC “Ceiling Credits.” Checkmarks are used to assign weight and rank projects. Rankings are considered along with community investment, timing, and resource efficiency, in making award recommendations to the VHFA Board. The VHFA Board votes on approving credits for specific proposals.

4% LIHTC “Bond Credits” are underwritten and considered for funding based on the financial strength of the project after meeting threshold requirements. There are no additional evaluation criteria for Bond Credits (p. 18).

It appears that Vermont’s QAP has changed significantly from the last evaluation. “Tier Priorities” noted in *Building Opportunity II* are not in the most recent QAP.

CHANGES SINCE 2015:

A1: Positive preference for geographic targeting in market areas that have been historically underserved in having affordable housing needs met is not in QAP. Moderate/weak positive rating instead for Mixed-Income threshold requirement.

A2: VHFA added strong incentives for promoting economic integration and projects in towns with affordable housing need but no affordable housing of the type proposed.

A3: Removed incentive for workforce housing in a ski area.

A4b: Added a positive preference for “moving to opportunity.”

A8: Added threshold requirement that projects must be developed in State designated downtowns, village centers, and neighborhood development areas.

B1: VHFA encourages letters of support from local officials and service providers.

D1: Removed incentive for projects serving households currently on public housing waiting lists.

F2: Removed priority for family housing.

G1: Moderate/weak positive incentive and positive preference for lowest-income households have been strengthened into strong positive incentives.

O1: Preference for projects “substantially” incorporating Universal Design features is now a requirement that all projects and units meet the Universal Design Policy in addition to Vermont Access Rules.

VIRGINIA: (QAP 2022)	Virginia Housing Development Authority
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.	❖ 20 points for producing 50 low-income housing units or less, minus 0.4 for each additional low-income housing unit

	produced down to 0 points for any development that produces 100 or more low-income housing units (p. 17)
A3. Mandatory requirements for development in high-opportunity areas	No
A4a. Scoring that encourages development in high-income areas.	<ul style="list-style-type: none"> ❖ Points for developments located in low-poverty areas: <ul style="list-style-type: none"> • 30 points for any proposed elderly or family development located in a census tract that has less than a 3% poverty rate based upon Census Bureau data • 25 points for developments located in a census tract that has less than a 10% poverty rate • 20 points for developments located in a census tract that has less than a 12% poverty rate (p. 14)
A4b. Scoring that encourages development in high opportunity areas.	<ul style="list-style-type: none"> ❖ 15 points for any proposed project in an opportunity zone and having a binding commitment of funding acceptable to the executive director pursuant to requirements as set forth on the application form, instructions, or other communication available to the public (p. 13)
A5. Scoring or requirements that preference siting near high-quality schools.	No.
A6. Scoring that discourages development in distressed neighborhoods. ⁹⁶	<ul style="list-style-type: none"> ❖ 15 points for any proposed development in a local housing rehabilitation zone created by an ordinance passed by the city, county, or town (p. 13) ❖ 20 points for any proposed new construction (including adaptive reuse and rehabilitation that creates additional rental space) that is located in a pool identified by the authority as a pool with an increasing rent-burdened population (p. 14)
A7. Scoring or requirements that preference siting near mass transit.	<ul style="list-style-type: none"> ❖ 10 points for any development located within ½ mile of an existing commuter rail, light rail, or subway station or ¼ mile of one or more existing public bus stops

⁹⁶ 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.

	(20 if the development in a pool of credits for the Northern Virginia or Tidewater Metropolitan Statistical Area and is not ranked against other developments in the pool) (p. 14)
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ 10 points for any proposed development that is located in a qualified census tract or federal targeted area to designated as a revitalization area without adoption of a resolution (p. 13) ❖ 10 points for any proposed development in a redevelopment area, conservation area, or rehabilitation area created by the city or county pursuant to the VA Code and deemed to be designated as a revitalization area without adoption of a resolution (p. 13) ❖ 15 points for any proposed development in a revitalization area designated by resolution adopted pursuant to the Code (p. 13) ❖ 15 points for any proposed development listed in the top 25 developments identified by Rural Development as high priority for rehabilitation at the time the application is submitted to the authority (p. 14)
<p>B1. Local participation in site selection is limited to statutory minimum.⁹⁷</p>	<ul style="list-style-type: none"> ❖ Up to 50 point DEDUCTION for failure to make a timely submission of the form prescribed by the authority with any required attachments, providing such information necessary for the authority to send a letter addressed to the current chief executive officer (or the equivalent) of the locality in which the proposed development is located, soliciting input on the proposed development from the locality within the deadlines established by the executive director (p. 12) ❖ Up to 40 points for: <ul style="list-style-type: none"> (i) any funding source, as evidenced by a binding commitment or letter of

⁹⁷ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>intent that is used to reduce the credit request</p> <ul style="list-style-type: none"> (ii) Commitment to donate land or buildings or tap fee waivers from the local government; or (iii) Commitment to donate land (including a below market-rate land lease) from an entity that is not a principal in the applicant (p. 13) <p>Up to 25 point DEDUCTION for a letter in response to its notification to the chief executive officer of the locality in which the proposed development is to be located opposing the allocation of credits to the applicant for the development. In any such letter, the chief executive officer must certify that the proposed development is not consistent with current zoning or other applicable land use regulations. Any such letter must also be accompanied by a legal opinion of the locality's attorney opining that the locality's opposition to the proposed development does not have a discriminatory intent or a discriminatory effect (as defined in 24 CFR 100.500(a)) that is not supported by a legally sufficient justification (as defined in 24 CFR 100.500(b)) in violation of the Fair Housing Act (Title VIII of the Civil Rights Act of 1968, as amended) and the HUD implementing regulations (p. 13)</p>
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HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No
C2. Scoring that incentivizes affirmative marketing.	[See O2]
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.	<ul style="list-style-type: none"> ❖ 5 points for commitment by the applicant for any development without Section 8 project-based assistance to give leasing preference to individuals with families: <ul style="list-style-type: none"> (i) On public housing waiting lists maintained by the local housing

	<p>authority operating in the locality in which the proposed development is to be located and notification of the availability of such units to the local housing authority by the applicant or</p> <p>(ii) On Section 8 waiting lists maintained by the local or nearest Section 8 administrator for the locality in which the proposed development is to be located and notification of the availability of such units to the local Section 8 administrator by the applicant (p. 13)</p>
<p>D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.</p>	<ul style="list-style-type: none"> ❖ [Threshold] Each applicant shall commit in the application to provide, unless prohibited by an applicable federal subsidy program, a leasing preference to individuals having a voucher or other binding commitment for rental assistance from the Commonwealth (p. 9)
<p>F1. Incentives for larger family units.</p>	<ul style="list-style-type: none"> ❖ Up to 30 points for commitment by the applicant to give a leasing preference to individuals and families with children in developments that will have no more than 20% of its units with one bedroom or less (15 points, plus 0.75 points for each percent of low-income units in the development with three or more bedrooms, up to an additional 15 points) (p. 17)
<p>F2. Incentives targeting families/families with children</p>	<ul style="list-style-type: none"> ❖ 15 points if the development provides licensed childcare onsite with a preference and discount for residents or an equivalent subsidy for tenants, determined based on household income and household size, to utilize a licensed childcare facility of tenant’s choice (p. 15)
<p>G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).</p>	<ul style="list-style-type: none"> ❖ 20 points for any development subject to HUD’s Section 8 or Section 236 program or Rural Development’s 515 Program, at the time of application (p. 13) ❖ 10 points for any development receiving new project-based subsidy from HUD or Rural Development for the greater of 5 units or 10% of the units of the proposed development (p. 14)

See O2

- ❖ (20 points for producing 50 low-income housing units or less, minus 0.4 for each additional low-income housing unit produced down to 0 points for any development that produces 100 or more low-income housing units (p. 17)

- ❖ Up to 50 points for commitment by the applicant to impose income limits on the low-income units throughout the extended use period below those required by the IRC in order for the development to be a qualified low-income development. Points are calculated as the product of 100 multiplied by the percentage of housing units in the proposed development both rent restricted to and occupied by households at or below 50% of the area median gross income; plus one point for each percentage point of such housing units in the proposed development that are further restricted to rents at or below 30% of 40% of the area median gross income up to an additional 10 points
OR

Up to 25 points for commitment by the applicant to impose rent limits on the low-income housing units throughout the extended use period below those required by the IRC in order for the development to be a qualified low-income development points are calculated as the product of 50 multiplied by the percentage of housing units in the proposed development rent restricted to households at or below 50% of the area median gross income; plus one point for each percentage point of such housing units in the proposed development that are further restricted to rents at or below 30% of 40% of the area median gross income up to an additional 10 points (p. 20)

H1. Racial/demographic reporting requirements.	No
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ 50 points for any development in which: <ul style="list-style-type: none"> (i) The greater of 5 units or 10% of the units will be assisted in any form of documented and binding federal or state project-based rent-subsidies in order to ensure occupancy by extremely low-income persons; AND (ii) The greater of 5 units or 10% of the units will conform the HUD regulation interpreting the accessibility requirements of §504 of the Rehabilitation Act and be actively marketed to person with disabilities as defined by the FHA in accordance with a plan submitted as part of the application for credits (all common space must also conform to HUD regulations interpreting the accessibility requirements of § 504 of the Rehabilitation Act, and all the units described in clause (ii) above must include roll-in showers and roll-under sinks and front control ranges, unless agreed to by the authority prior to the applicant's submission of its application) (p. 16) ❖ 20 points for any development in which 10% of the units: <ul style="list-style-type: none"> (i) Conform to HUD regulations interpreting the accessibility requirements of § 504 of the Rehabilitation Act; AND (ii) Are actively marketed to persons with disability as defined by the FHA (p. 16)
O2. Scoring that promotes units for special needs populations.	No.
O3. Scoring to promote home ownership.	No.
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ [Compliance] The owner of a low-income housing development must certify annually that, for the preceding 12-month period, all units in the development were for use by the general public and that no finding of

	discrimination under the FHA has occurred for the development (p. 31)
Change since 2015?	A2; A4b; A6; B1; F2; O1

<https://www.virginiahousing.com/partners/rental-housing/rental-housing-tax-credits>

NOTES

- Set-aside pools include:
 - Nonprofit Pool – 15%
 - Local Housing Authority Pool – 15%
 - New Construction Pool – 15%
 - Northern Virginia / Planning District 8 Pool – 18.02%
 - Northwest / North Central Virginia Area Pool – 9.20%
 - Richmond MSA Pool – 11.63%
 - Tidewater MSA Pool – 17%
 - Balance of State Pool – 14.15%
 - At-Large Pool – Unreserved credits from above pools

TOTAL POINTS POSSIBLE: Any applicant that is assigned a total number of points less than a threshold amount of 400 points shall be rejected from further consideration and shall not be eligible for any reservation or allocation of credits (p. 21)

CHANGES SINCE 2015

- **A2:** Points now allocated for producing fewer low-income units
- **A4b:** Points now allocated to projects proposed to be in Opportunity Zones
- **A6:** Points now allocated for rehabilitation projects and projects proposing to build housing in rent-burdened areas
- **B1:** Points will be deducted for failure to timely submit notification to local authority – submission must include solicitation for input
- **D2:** Leasing preference to voucher holders or recipients of other rental assistance is now a threshold requirement.
- **F2:** Points now given to projects that provide onsite childcare available to tenants
- **O1:** QAP now gives more opportunity to gain more points for projects with accessible units in compliance with the FHA

STATE: (Washington QAP 2023)	Washington State Housing Finance Commission
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	
A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration	❖ The Commission has established specific percentages of the Annual Authority for credit set-asides. Percent allocations have been divided into three state geographies called Geographic Credit Pools: King County (35%), Metro Counties (37%) and Non-Metro Counties (28%) (p. 38 Policies). Projects compete for credit allocations based upon the pool in which they are located. Eligibility for

	<p>each pool is based solely on the location of the project.</p> <ul style="list-style-type: none"> ❖ If in any one year, projects in any one county are allocated 50% or more of the credit allocated in that county’s Geographic Credit Pool, then in the following year, the first 50% of the credit available in the Credit Pool must be awarded outside of that county, but inside the Geographic Credit Pool, before any projects proposed in that county will be considered (p. 42 Policies). This does not apply to King County.
<p>A2. Scoring that discourages racial and economic concentration.</p>	<p>No.</p>
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ (-) Projects in Lower Income Counties receive a two-point advantage over the Higher Income Counties when the same set-aside combination is chosen in recognition that the same income targets are more difficult to serve in Lower Income Counties where the allowable rents do not generate as much operating income. (p. 47 Policies)
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ 2 points will be awarded to Projects that provide nearby access to food and go beyond the minimum Access to Services criterion of the Evergreen Sustainable Development Standard (ESDS). For Urban projects: projects located within ¼ mile walking distance of at least 3 community, retail or service facilities or within a ½ mile walking distance of 5 facilities from the list below AND located within ½ mile walking distance of a supermarket, a grocery store with produce or a farmers’ market. For Rural projects: projects located within ¼ mile walking distance of at least 3 community, retail or service facilities or within a 2 mile driving distance of 4 facilities from the list below AND 1 of the facilities must be a supermarket, a grocery store with produce or a farmers’ market (see Facilities Table in Notes) (p. 65-6 Policies). ❖ (King County only) 1 point to Projects located in or near the top 25 cities and Census Designated Places (CDP) within each of the Metro and Non-Metro Credit Pools that have experienced the highest absolute job growth over the five year

	<p>period from 2005 to 2010. Projects must be located within a 5 mile radius of the top growth places in the Metro Credit Pool and within a 10 mile radius of the places in the Non-Metro Credit Pool (p. 69 Policies).</p> <ul style="list-style-type: none"> ❖ (King County only) 1 point to projects located in a census tract that is rated High or Very High on the Comprehensive Opportunity Index as defined by the Puget Sound Regional Council (p. 71 Policies).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<p>No.</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.⁹⁸</p>	<ul style="list-style-type: none"> ❖ (-) Commission gives preference to projects located in qualified census tracts (p. 1 QAP). ❖ (-) See selection criteria #3 (under Notes). ❖ (-) If projects receive equal scores within the same Geographic Credit Pool the first tie breaker will be if a project is located in a Qualified Census Tract (p. 49 Policies) ❖ (-) Up to 6 points to projects that are at imminent risk of loss to the State’s affordable housing portfolio due to the potential conversion of use-restricted units to market rate units (p. 63 Policies).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 1 point to projects located within a 10-minute walk of Fixed Transit Infrastructure and located in an area zoned for high capacity transit-supported density (King Co. only). “Fixed Transit Infrastructure” defined as Light Rail Stations, Commuter Rail Stations, Ferry Terminals, Bus Rapid Transit Stations, Streetcar Stops, and Major Bus Transit Centers. (p. 68 Policies).
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Commission gives preference to projects the development of which will contribute to a concerted community revitalization plan (p. 1 QAP). ❖ See selection criteria #5 (under Notes).

⁹⁸ 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.

	<ul style="list-style-type: none"> ❖ 2 points to a Project that is located within the defined geographic boundaries of a planning document approved by the governing body of the local jurisdiction. The planned targeted area must provide for a mix of housing, retail and services and have zoning provisions to accommodate new growth in the area. The plan must include policies addressing the creation or preservation of affordable housing serving households at 80% AMI or below (p. 67 Policies) (King County and Metro projects only). ❖ 1 point to a Project located within the defined geographic boundaries of a Community Revitalization Plan. A CR Plan must (p. 67 Policies): <ol style="list-style-type: none"> 1. Be a published document, approved and adopted by a governing body, by ordinance, resolution, or other legal action; and 2. Target funds or tax incentives to specific geographic areas for either: economic development, commercial/retail development.
<p>B1. Local participation in site selection is limited to statutory minimum.⁹⁹</p>	<ul style="list-style-type: none"> ❖ Credits may be extended up to one year for projects that meet the application criteria, compete successfully, conform in good faith to land use and zoning requirements, but are delayed due to subsequent action or inaction out of its control. Possible reasons for delay include delays in local government approvals and lawsuits challenging land use and permit approvals (p. 48 Policies). ❖ (-) For projects located in communities covered by a local consolidated plan, the Applicant must submit a letter from the local government planning or community development department or housing authority responsible for administering the consolidated plan, states that the project is consistent with the consolidated plan and indicates that the project is responsive to local housing needs described in the consolidated plan. For projects located in communities <u>not</u> covered by a local consolidated plan, the Applicant should submit a letter dated no later than 6 months prior to the Application date from the local government

⁹⁹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	<p>where the project is located which describes local housing needs and states that the project is responsive to those needs. (p. 26 Policies).</p> <ul style="list-style-type: none"> ❖ “Leverage Scoring” to reduce ability of local jurisdictions to influence the points process through action or inaction. See notes below.
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
<p>C1. Mandatory requirements ensuring affirmative marketing.</p>	<ul style="list-style-type: none"> ❖ If, after initial occupancy by a qualified resident, a housing unit subject to a Housing Commitment for Priority Populations (other than Elderly Housing Commitment and the Housing for the Homeless Commitment) is subsequently vacated, the project owner shall actively market any vacant housing units that are necessary to comply with the applicable Commitment(s) for a minimum of 30 days. The owner shall not rent such units to anyone who is not eligible for the selected Commitment(s) during this 30-day period (p. 59 Policies).
<p>C2. Scoring that incentivizes affirmative marketing.</p>	<p>No.</p>
<p>C3. Scoring that incentives language access and marketing to non-English speakers.</p>	<p>No.</p>
<p>D1. Scoring that promotes Section 8 voucher access in high-opportunity areas.</p>	<p>No.</p>
<p>D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Owner must show that at all times an extended low-income housing commitment as described in Section 42(h)(6) of the Code was in effect, including the requirement that an owner cannot refuse to lease a unit in the project to an applicant who holds a voucher or certificate of eligibility under Section 8 of the United States Housing Act of 1937 (p. 6 QAP). ❖ The Applicant must submit a copy of a written letter committing to notify the public housing authority of the availability of low-income units. In the commitment letter, the Applicant must: 1) identify the location, the planned number of low-income housing units, the target population and the expected placed-in-service date for the proposed project; 2) agree to notify the public housing authority or other such agency, in writing, of the availability of low-income housing units at

	<p>least 60 days before the placed-in-service date of each building in the project; 3) agree to notify the public housing authority or other such agency, in writing and at least once a year, of the ongoing availability of low-income housing units; and 4) encourage the public housing authority or such other agency to make the above notices available in any way it deems appropriate to those people on a waiting list for public housing programs (p. 38 Policies).</p>
F1. Incentives for larger family units.	<ul style="list-style-type: none"> ❖ [See O2] These points are for 3+ bedroom units. A Large Household consists of four or more persons who are not necessarily related (p. 57 Policies). ❖ 10 points available if the project provides a minimum of 20% of the total housing units as Housing for Large Households (p. 56 Policies).
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ See selection criteria #12 (under Notes).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ Up to 60 points for additional low-income set-aside units (30-60% AMI). Scoring depends on set-aside percentages, income levels, and whether units are in a high or low-income county (p. 53-4 Policies).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	<ul style="list-style-type: none"> ❖ Owner must assist the Commission with meeting federal reporting requirements by collecting and submitting information to the Commission annually concerning the race, ethnicity, family composition, age, income, use of rental assistance under section 8(o) of the United States Housing Act of 1937 (p. 5 QAP).
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	<ul style="list-style-type: none"> ❖ [See O2]
O2. Scoring that promotes units for special needs populations.	<ul style="list-style-type: none"> ❖ See selection criteria #2 (under Notes). ❖ Up to 35 points for projects providing ≥75% of total units as Supportive Housing for the Homeless OR up to 20 points for projects that select 2 of the following: Provide ≥20% of units as Housing for Farmworkers; Provide ≥20% of units as Housing for Large Households (F1); Provide ≥20% of units as Housing for Persons with Disabilities (also O1); Provide ≥20% of units as Housing for the Homeless; Provide an Elderly Housing Project (p. 55-6 Policies)

<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ See selection criteria #13 (under Notes). ❖ 2 points to Projects that are intended for eventual tenant ownership after the initial 15-year compliance period. Intent to convert must be expressed in a clear and comprehensive plan at the time of the Application in a manner satisfactory to the Commission. This plan must address financial and programmatic structure; timing of ownership transfer; eligibility and selection process for potential owners; homeowner education, down payment assistance, and other programs that the sponsor will provide to assist the potential homeowners and all lienholder interests (p. 73 Policies).
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ Owner must be able to show that at all times all units in the project 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. 6 QAP); and that to the extent required by federal law the property is in compliance with the Fair Housing Accessibility Guidelines as issued in the Federal Register Vol. 56, No. 44 (p. 7 QAP). ❖ Applicant must agree that any Housing Commitment for Priority Populations will be established, implemented, and kept in compliance with the Fair Housing Act, as amended; the Architectural Barriers Act of 1968; the Americans with Disabilities Act; and any other local, state, and Federal nondiscrimination or accessibility laws, regulations, or requirements (p. 58 Policies).
<p>Change since 2015?</p>	

Washington’s Tax Credit Program is described in three separate documents: The Qualified Allocation Plan, the Rules, and the Policies. All of these documents are available online at <https://www.wshfc.org/mhcf/9percent/2023Application.htm>.

If more than 50% of a project is financed with tax-exempt Multifamily Bonds, the project may access the 4% Low Income Housing Tax Credit without competing for an allocation of LIHTCs. Projects must first submit an application and score a minimum of 30 points on the Qualified Allocation Plan.

Housing credit in the 9% Program is allocated through an annual competitive process in which projects are evaluated and scored according to the Commission’s established criteria.

OVERALL ASSESSMENT TOTAL POINTS POSSIBLE: 222. (Scoring systems is such that points can only be gained.) Minimum points necessary: King County—164; Metro Counties—158; Non-Metro Counties—154.

NOTES: In determining housing priorities, the Commission will give weight to projects which, among other things (p. 1-2):

1. are located in areas of special need as demonstrated by location, population, income levels, availability of affordable housing and public housing waiting lists;
2. set aside units for special needs populations, such as large households, the elderly, the homeless and/or the disabled (O2);
3. preserve federally assisted projects as low-income housing units ((-) A6);
4. rehabilitate buildings for residential use;
5. include the use of existing housing as part of a community revitalization plan (A8);
6. have received written authorization to proceed as a United States Department of Agriculture - Rural Housing Service multifamily new construction project approved by the Commission;
7. are historic properties;
8. are located in targeted areas;
9. leverage public resources;
10. maximize the use of credits;
11. demonstrate a readiness to proceed;
12. serve tenant populations of individuals with children (F2);
13. are intended for eventual tenant ownership (O3); and
14. promote energy efficiency.

B1: Historically, the Commission has awarded “leveraging points” based upon the following point categories: local funding commitments, federal leverage, state funding coordination (i.e., Housing Trust Fund) and municipal participation in order to encourage projects to seek additional funding sources. While this remains the Commission’s intent, nationally there is a concern that jurisdictions can prevent the siting of affordable housing by withholding their support of projects, making them less competitive. To address these national concerns, the Commission is creating a new point category that will award points based upon a project’s ability to leverage additional funds without allowing any one funding resource to overly influence the points process through action or inaction. This new “Leverage Scoring and Points” category replaces the following point categories mentioned above: Local Funding Commitment, Federal Leverage of Capital Funds, State Funding Coordination and Municipal Participation Point (p. 60 Policies).

CHANGES SINCE 2015:

A4a: Added two point advantage for projects in Lower Income Counties over Higher Income Counties.

West Virginia: (QAP 2023-2024)	West Virginia Housing Development Fund
Measure	Evidence
HOUSING LOCATION: Site and Neighborhood Standards	

<p>A1. Mandatory restrictions prohibiting increases in racial and economic (or low-income) concentration</p>	<p>No</p>
<p>A2. Scoring that discourages racial and economic concentration.</p>	<ul style="list-style-type: none"> ❖ Up to 30 points for New Supply / Up to 15 points for Existing Low-Income Housing for a property located in a county where that county’s LIHTC unit production as a percentage of the renter-occupied housing units is included in or falls between 18.21% (high points) and 0% (low points) (p. 43)
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ Up to 20 points for New Supply / Up to 10 points for Existing Low-Income Housing for a property located in a county where that county’s percentage of household’s whose gross rent as a percentage of household income is 30% or greater is included in or falls between 24.3% (low points) and 73.7% (high points) (p. 45)
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 10 points for New Supply / Up to 5 points for Existing Low-Income Housing for a property located in in a census tract where that census tract’s owner-occupied units as a percentage of total occupied housing units is included in or falls between 0% (low points) and 100% (high points) (p. 49) ❖ Up to 10 points for New Supply / Up to 5 points for Existing Low-Income Housing for a property located in a census tract where that census tract’s unemployment rate of the total population 20-64 years of age is included in or falls between 28% (low points) and 0% (high points) (p. 53)
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ Up to 20 points for New Supply / Up to 10 points for Existing Low-Income Housing for school performance. The Fund has assigned letter grades to each school in the State based upon the West Virginia Schools Balanced Scorecard. Points will be awarded to properties based upon the letter grade of the schools (elementary, middle, and high

	<p>school) in such property’s public-school district. The property address must be serviced by the school bus route for the applicable school. If the property address is not serviced by the school bus route for the claimed school, even if the school is located in the property’s public-school district, points will not be awarded for that school. If more than one school is located in the property’s public-school district (e.g. two elementary schools), and the property address is serviced by both schools, the property will be awarded points for the highest graded school. Highest points awarded to A schools and lowest points awarded to D schools (p. 55)</p>
<p>A6. Scoring that discourages development in distressed neighborhoods.¹⁰⁰</p>	<ul style="list-style-type: none"> ❖ [Set-Aside] Up to 50 points for existing low-income housing preservation (p. 20) ❖ Existing Low-Income Housing Properties ONLY: Up to 100 points for existing housing in most need of rehabilitation. Points will be awarded to properties based upon the Fund’s categorization of the existing low-income housing properties in most need of and most suitable for rehabilitation *(see notes) as follows: <ul style="list-style-type: none"> • 100 points will be awarded to each property which is rated as Tier 1 (in the most need of and most suitable for rehabilitation) • 75 points will be awarded to each property which is rated as Tier 2 • 50 points will be awarded to each property which is rated as Tier 3 (p. 22) ❖ 20 points will be awarded to an Applicant that submits documentation evidencing that the property: (1) will preserve existing RD or HUD or other government low-income residential rental units

¹⁰⁰ 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>previously financed or guaranteed/insured through any RD or HUD or other government finance or guarantee/insurance program; or provide a new supply of RD or HUD or other government low-income residential rental units financed or guaranteed/insured through any RD or HUD or other government finance or guarantee/insurance program AND (2) the property evidences adequate cash flow to fully amortize 50% or more of each such RD or HUD or other government financing, OR the property evidences adequate cash flow to fully amortize 75% or more, in the aggregate, of all new such RD or HUD or other government financing. 10 points will be awarded if only criteria (1) is met (p. 23-24)</p> <ul style="list-style-type: none"> ❖ 15 points will be awarded to an Applicant that submits documentation evidencing that the property is located in a QCT (p. 67)
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<ul style="list-style-type: none"> ❖ 10 points for New Supply / 5 points for Existing Low-Income Housing – points will be awarded to an applicant which submits documentation evidencing that the property is located within 1/5th of a mile (walkable route, ot as the crow flies) from a public transportation stop (e.g. bus stop, PRT station, bus route with “hail and ride” stops), or that a public transportation stop will be added within 1/5th of a mile (walkable route, not as the crow flies) in conjunction with the establishment of the New Supply housing; OR points will be awarded to an Applicant which submits documentation evidencing that the property will provide a form of transportation from and to the property that is comparable to or exceeding the service levels (e.g. accessibility, capacity, reliability, practicality, etc.) and scope of a typical fixed route public transportation system. In order to be awarded the points

	available, the transportation service must be available to all residents of the property (p. 56-57)
A8. Focus on and operationalization of a neighborhood revitalization plan.	<ul style="list-style-type: none"> ❖ 15 points will be awarded to an Applicant that submits documentation evidencing that the property includes the use of Existing Housing that is clearly and specifically stated as part of a CRP that has been approved by the appropriate governing body of the local jurisdiction within which such “community” is located (see notes for definitions of bolded text) (p. 29-30, p. 67) ❖ 35 points will be awarded to an Applicant that submits documentation evidencing that the property is located in a QCT and the development of such property is clearly and specifically stated as part of a CRP that has been approved by the appropriate governing body of the local jurisdiction within which such “community” is located (p. 67)
B1. Local participation in site selection is limited to statutory minimum. ¹⁰¹	<ul style="list-style-type: none"> ❖ Prior to allocating any Credits and in accordance with Subsection 42(m)(1)(A)(ii) of the Code, the Fund will notify the Chief Executive Officer of the Local Jurisdiction within which the buildings in the property are or will be located and will provide the Chief Executive Officer of the Local Jurisdiction 60 calendar days, beginning on the day the notification is dated, to provide comments. The Fund welcomes all comments from the local jurisdiction. However, the Fund is an equal opportunity housing provider and, therefore, will not consider any comments that object to the property development in violation of the Fair Housing Act or any other applicable federal or state law (p. 9)
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	No

¹⁰¹ Evidence of the inverse: preferences or requirements for local participation should also be noted.

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.	<ul style="list-style-type: none"> ❖ 25 points will be awarded to an Applicant that submits a fully executed and witnessed commitment to utilize the Applicable PHA’s waiting list which is a written commitment with the appropriate PHA to utilize such PHA’s waiting list and to target the persons appearing on that waiting list to occupy all vacant low-income units in the property on an on-going basis (p. 61)
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	<ul style="list-style-type: none"> ❖ Owner must certify annually that an extended low-income housing commitment...was in effect, including the requirement under Subsection 42(h)(6)(B)(iv) of the Code that an Owner cannot refuse to lease a unit in the project to an applicant who holds a voucher or certificate of eligibility under Section 8 (p. 100).
F1. Incentives for larger family units.	See F2
F2. Incentives targeting families/families with children	<ul style="list-style-type: none"> ❖ 20 points will be awarded to an Applicant that commits to target for occupancy one or both of the Applicant-selected tenant populations listed below for at least 25% of the residential rental units in the property. The units in the property should be designated and suitable for the targeted occupancy populations: <ul style="list-style-type: none"> • Large family – a family unit consisting of one or more adult members having legal custody of three or more dependent children, each of whom is age eighteen or younger or a full-time student • Single Parent Family – a family unit consisting of only one adult member having legal custody of one or more dependent children, each of whom is age eighteen or younger or a full-time student (p. 60)
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<ul style="list-style-type: none"> ❖ [Set-Aside] Up to 50 points (each) for New Supply Rural and New Supply Non-Rural. Includes the exclusive use of a

newly constructed property, a substantial rehabilitation property, or an acquisition with substantial rehabilitation property, all of which must result in a direct increase of the stock of low-income residential rental units in a rural / non-rural area of the State (p. 20)

- ❖ [See A6]: while provisions incentivizing rehabilitation of existing low-income housing are negative in promoting development in distressed areas, they positively promote units for low-income households
- ❖ Up to 20 points for New Supply / Up to 10 points for Existing Low-Income Housing for a property located in a county where that county's median household income included in or falls between \$86,711 (low points) and \$30,127 (high points) (p. 44)
- ❖ Up to 10 points for New Supply / Up to 5 points for Existing Low-Income Housing for property located in a census tract where that census tract's households receiving food stamps/SNAP as a percentage of total households is included in or falls between 56.1% (low points) and 0% (high points) (p. 52)
- ❖ Up to 50 points if the Applicant has committed the property to serving tenants with annual incomes at or below 40% of the AMGI. Points are based on the percentage of the total residential rental units in the property (p. 64)
- ❖ Up to 40 points if the Applicant has committed the property to serving tenants with annual incomes at or below 50% of the AMGI. Points are based on the percentage of the total residential rental units in the property (p. 65)
- ❖ 150 points will be awarded to an Applicant that commits the property to

	<p>serving qualified low-income tenants, using the elected minimum set-aside requirements for the percentage (50% or 60% of the AMGI, and the applicable IRS rent restrictions for the 15 years beyond the close of the initial 15 year Compliance Period (p. 66)</p>
<p>REPORTING REQUIREMENTS</p>	
<p>H1. Racial/demographic reporting requirements.</p>	<p>No</p>
<p>OTHER CATEGORIES</p>	
<p>O1. Scoring that promotes units for persons with disabilities.</p>	<p>See O2</p>
<p>O2. Scoring that promotes units for special needs populations.</p>	<ul style="list-style-type: none"> ❖ 20 points will be awarded to an Applicant that commits to target for occupancy one or a combination of more than one of the Applicant-selected tenant populations listed below for at least 25% of the residential rental units in the property. The units in the property should be designed and suitable for the targeted occupancy populations. Tenants populations with special housing needs are as follows: Homeless, Displaced, Elderly, Handicapped, Disabled Veteran (p. 59-60)
<p>O3. Scoring to promote home ownership.</p>	<ul style="list-style-type: none"> ❖ 5 points will be awarded to an Applicant that 1) commits all residential rental units to eventual tenant ownership no later than 4 years after the end of the initial 15-year compliance period and 2) submits documentation evidencing a business plan describing how the residential rental units will be converted to tenant ownership (p. 62)
<p>O4. Provisions affirmatively furthering fair housing laws.</p>	<ul style="list-style-type: none"> ❖ At minimum, in order for a property to be eligible for Credits, the property must be constructed or rehabilitated, as applicable, in compliance with the Fair Housing Act (p. 12) ❖ [Certification] The owner of a new LIHTC property is required to certify annually that all units in the property were for use by the general public, including the the requirement that no finding of discrimination under the FHA occurred for the property. (p. 87)

Change since 2015?	A2; A4a/A4b; A5; A6; A7; B1; G1; O3

QAP 2023-2024: <https://www.wvhdf.com/wp-content/uploads/2023/04/2023-AND-2024-ALLOCATION-PLAN.pdf>

NOTES:

Set-Asides:

- Qualified Non-Profit (up to 50 points); 10%
- Existing Low-Income Housing Preservation (up to 30 points): 32%
- New Supply Non-Rural (up to 50 points): 26.5%
- New Supply Rural (up to 50 points): 26.5%
- Top Off (up to 50 points): 5%

* Instances when the Fund may consider a property not suitable for rehabilitation (which may result in property rejection) may include, but are not limited to, the following:

- When the rehabilitation costs to make the property into decent, safe, and sanitary housing exceed the cost of replacing it with a newly constructed building
- When most of the structural components appear severely out of alignment, damaged, substandard, or missing
- When the overall condition of the structure is unacceptable for purposes of habitation
- When the current value of the structure, plus rehabilitation costs exceed a level considered economically feasible, given the property’s potential for income after rehabilitation, the estimated operating expenses, and the cost of available mortgage financing
- When it has been determined that based upon the Fund’s site visit, the property does not warrant rehabilitation. Such properties are determined to be below a Tier 3 rating and will receive zero points. It is recommended that such properties not be submitted for consideration

CRP Definitions:

- **Clearly and specifically stated** – the existing housing must be located in specified boundaries within the community as evidenced by a geographic scope description of the community and/or map included in the adopted plan or the existing housing must be specifically named in the CRP AND the rehabilitation of such housing fulfills the specified goals of the CRP (e.g., a goal to rehabilitate and improve existing housing)
- **Fulfills the specific goals** – the rehabilitation of the property fulfills one or more goals listed for the specific area in which the property is located within the community. For example, if the property is located in Neighborhood A, but the goal that the rehabilitation of the property fulfills is a goal for Neighborhood B, the property does not fulfill the specified goals of the CRP
- **Approved** – the appropriate governing body of the local jurisdiction has taken an official action to adopt such CRP by ordinance or resolution
- **Appropriate governing body of the local jurisdiction** – either
 - the city council or comparable governing body of a municipality, or
 - the county commission or comparable governing body of a county, or
 - a community development authority established in accordance with State law (i.e. West Virginia Code Chapter 7, Article 12) whose jurisdiction includes the location involved, or

- a regional planning and development council established in accordance with State law (i.e. West Virginia Code Chapter 8, Article 25) whose jurisdiction includes the location involved.

TOTAL POINTS POSSIBLE: Total Points Available 1000 points. Properties are scored as either Existing Low-Income Housing or New Supply. Due to the bifurcation of the scoring system as shown above, any property involving both Existing Low-Income Housing and New Supply will be scored on a weighted average based upon the number of units. Proposed properties must receive a **minimum of 500 points** in order to be considered any further for LIHTC eligibility.

CHANGES SINCE 2015

- **A2:**
 - Fewer points allocated to projects located in areas of lowest LIHTC production.
 - Points no longer allocated for projects located in counties where the tax credit rent restriction as a percentage of average monthly wage.
- **A4a/A4b:** New Supply housing in high opportunity areas is now a distinct provision from New Supply housing in high income areas. New Supply housing remains a set-aside.
- **A5:** Points are now allocated for the proximity to high quality schools (points are based on the quality of the schools in the proposed properties school district with the highest points awarded to A schools and lowest points awarded to D schools).
- **A6:** A significant number of points are now allocated to rehabilitation and preservation projects.
- **A7:** QAP now allocates points for proximity to public transportation.
- **B1:** Provision now specifies that the Agency will not consider any comments that object to the property development in violation of the Fair Housing Act or any other applicable federal or state law.
- **D2:** QAP now includes requirement of annual certification that owner has not refused to lease to voucher holders.
- **G1:** QAP now heavily favors the creation, rehabilitation, and preservation of housing for the lowest-income tenants.
- **O3:** Fewer points allocated to projects that promote homeownership after the compliance period.

STATE: WISCONSIN (QAP 2023-24)	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.	❖ Up to 12 points for mixed income housing. Points are based on the percentage of market rate units in the development (0.8 points for every percentage point of market rate units in the development) (A27).

	<ul style="list-style-type: none"> ❖ (-) Five points will be awarded to properties located in census tracts in which 50% or more of renters pay over 30% of their income towards rent. Three points will be awarded to properties located in census tracts in which 40 to 40.99% of renters pay over 30% of their income towards rent (A37). [Negative provision to the extent that a large share of cost burdened renters encourages racial and economic concentration] ❖ Up to 8 points for projects located in Rural or Tribal Areas without recent housing tax credit awards. Eligibility based on county or sponsorship by Tribal Nation (A38).
<p>A3. Mandatory requirements for development in high-opportunity areas</p>	<p>No.</p>
<p>A4a. Scoring that encourages development in high-income areas.</p>	<ul style="list-style-type: none"> ❖ 5 points for properties in census tracts at/or above 120% of CMI, 3 points if in census tracts between 100-119% CMI (A37).
<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 10 points for access to services and amenities. Must be within: 2 miles for Rural, 1.5 miles for Small Urban, 4 miles for sites on Tribal lands, and 1 mile for all other areas of the state. Services and amenities include: full service grocery store (2 pts); public elementary, middle, or high school; senior center (2 pts); full service medical clinic or hospital; library; public park with playground equipment or athletic facilities, or hiking/biking trail; job training facility, Community College or continuing education programs (A37). ❖ Up to 12 points for projects in Workforce Housing Communities. Up to 4 points each for: Top Job Centers (county that added 400 jobs or more in the past year, or county that had positive job growth of fewer than 400 jobs in the last year (2 pts)); Net Job Growth (county that experienced job growth of 5% or greater in the past year (2 pts for 3-4%, 1 pt for 1-2%)); Individual Employer Growth (municipality in which an individual employer has added at least 50 net jobs in that community during the last 5 years) (A39).

A5. Scoring or requirements that preference siting near high-quality schools.	❖ 5 points for developments sited in school districts ranked as Significantly Exceeds Expectations by the Wisconsin Department of Public Instruction’s most recent Overall Accountability Score. 3 points for sites in school districts ranked as Exceeds Expectations (A37).
A6. Scoring that discourages development in distressed neighborhoods. ¹⁰²	❖ (-) 10% reservation set-aside for federally-assisted housing units (p. 6).
A7. Scoring or requirements that preference siting near mass transit.	❖ Up to 5 points to developments located within ½ mile from a regularly scheduled bus stop (A26).
A8. Focus on and operationalization of a neighborhood revitalization plan.	<p>❖ See Objective #2 in Notes section.</p> <p>❖ 3 points for properties in a QCT that have a concerted community revitalization plan, 5 points if the plan specifically addresses the need for affordable and/or rental housing in the area of the proposed project (A25).</p> <p>❖ Up to 25 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. A32).</p>
B1. Local participation in site selection is limited to statutory minimum. ¹⁰³	❖ 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 (p. 10).
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.	❖ Supportive Housing set-aside requires firm commitments for rental subsidy for a minimum 25% of the total development units from a public housing authority or

¹⁰² 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.

¹⁰³ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	government entity having such authority, and must clearly state support of the project. Examples include Section 8 vouchers (p. 7).
D2. Requirements for monitoring Section 8 voucher access in high-opportunity areas.	❖ 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. 26).
F1. Incentives for larger family units.	❖ Up to 5 points for 3+ bedroom units. Points based on percentage of total units with 3+ bedrooms (5-10% = 1 point; 11-15% = 3 points; >16% = 5 points) (A28).
F2. Incentives targeting families/families with children	No.
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	<p>❖ See Objective #1 in Notes section.</p> <p>❖ Up to 63 points for developments with at least 5% of units reserved for HH's with incomes at 50% or less of CMI. Point award increases for higher percentage of total units for HH's at 50% or less of CMI. Calculated by multiplying percent of total units by CMI set-aside factor—Factor for 50% CMI is 0.86; factor for 40% CMI is 1.07; factor for 30% or lower is 1.29 (A29).</p>
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ Up to 18 points for developments incorporating Universal Design features (A33).
O2. Scoring that promotes units for special needs populations.	<p>❖ See Objective #1 in Notes section.</p> <p>❖ 12.5% supportive housing set-aside for developments intending to provide supportive services in at least 25% of the units for individuals and families who are chronically homeless or prone to homelessness and who require access to supportive services to maintain housing (p. 7).</p>

	<ul style="list-style-type: none"> ❖ Up to 15 points for supportive housing— developments intending to provide supportive services to veterans, individuals, and to families who may require access to supportive services to maintain housing. 0.75 points for every percentage point of targeted housing in the development. Points not available to developments applying in the Supportive Housing set-aside (A30). ❖ Up to 5 points for developments intending to provide services to address the needs of Veterans. Must include referral and outreach system to connect potential Veteran residents. Points awarded by percentage of total units set aside for Veterans (A31).
O3. Scoring to promote home ownership.	<ul style="list-style-type: none"> ❖ See Objective #4 in Notes section. ❖ 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 (A35).
O4. Provisions affirmatively furthering fair housing laws.	<ul style="list-style-type: none"> ❖ 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 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. 25).
Change since 2015?	A2; A4a; A4b; A5; A6; A7; B1; D1; F1; G1; O3

QAP (2023-24): <https://www.wheda.com/globalassets/documents/tax-credits/htc/2023/qap-final-2023-24.pdf>

Detailed scoring criteria can be found in the 2023 Multifamily Application (Excel document) available on the 2023 Program page: <https://www.wheda.com/developers-and-property-managers/tax-credits/htc/allocating/2023/2023-program>

- Citations to Application are indicated by “A”. Number indicates tab of the Excel document.

NOTES:

TOTAL POINTS POSSIBLE: 273. Minimum score of 140 points required.

Set asides: General (32.5%), Nonprofit (10%), Preservation (10%), Rural (25%), Supportive Housing (12.5%), Innovative Housing (10%) (p. 6-7).

Objectives of the QAP include (p. 4):

1. Increase supply of affordable housing (**G1, O2**)
 - a. Housing for very-low income families and seniors
 - b. Housing with services, including those experiencing homelessness and veterans
2. Employ place-based strategies
 - a. Coordinate housing development with housing & community development plans (**A8**)
 - b. Encourage and increase supply of affordable housing in high housing need areas including rural and high growth areas
 - c. Incentivize the delivery of affordable housing which meets the life cycle needs and priorities of the communities
3. Seek innovative ways to leverage capital
 - a. Collaborate with foundations, employers, industry leaders, and other key stakeholders to find new opportunities for leverage
 - b. Build capital stacks which reflect local, state, and federal funding opportunities
4. Increase economic opportunity
 - a. Encourage homeownership and equity building (**O3**)
 - b. Increase tenant stabilization through integrated resident services and property management
 - c. Cultivate local ecosystem of affordable housing practitioners
 - d. Encourage high quality supportive services design, partnerships, and outcomes

Concerted Community Revitalization Plans (CCRPs) must: Be geographically specific, include a strategy for obtaining commitments of public and private investment for infrastructure, amenities, or services beyond the proposed development, clearly demonstrate the need for revitalization in the planning area, include elements such as outcome goals, timelines and benchmarks, and identification of community partners, and have been approved within the last 10 years. CCRPs do not necessarily need to be approved by the local municipality. CCRPs completed by neighborhood groups will be acceptable (A25).

CHANGES SINCE 2015:

A2: QAP now contains scoring incentives for mixed income housing and siting projects in areas without recent tax credit awards.

A4a: Added low point award for siting projects in high-income census tracts.

A4b: Removed 7% set-aside for “high impact” projects. Removed QAP objective encouraging support of job creation goals and increasing the quantity of affordable workforce housing near employment centers. Reduced point award for Workforce Housing.

A5: Added low point award for siting in high ranking school districts.

A6: Reduced set-aside for federally-assisted housing units by half.

A7: Added low point award for proximity to bus stop.

B1: Removed point award for letters of local support. Removed large point award for local financial participation.

D1: Added a provision within the Supportive Housing set-aside requiring commitments for rental subsidy for 25% of the total units from a PHA or government entity.

F1: Reduced point award for 3+ bedroom units.

G1: Removed tiebreakers, including tiebreaker giving priority to application with the highest percentage of units set aside at 30% and 40% of county median income.

O3: Encouraging homeownership is now an objective of the QAP.

STATE: WYOMING (QAP 2022)	Wyoming Community Development Authority (WCDA)
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.	<ul style="list-style-type: none"> <li data-bbox="812 993 1404 1308">❖ In an effort to equitably distribute funding throughout the state, 10 points will be awarded per year if the community has not received funding within the last 4 years. For example, if a community has not received any funding in the last 3 years, the proposed project would receive 30 points. Funding includes all new construction, acquisition, and/or rehabilitation projects (p. 31). <li data-bbox="812 1350 1404 1686">❖ A project may receive up to 15 points if it is demonstrated that the project will not contribute to an above average concentration of Low-Income housing established within the site’s Primary Market Area as defined in the Market Analysis. A project may be assessed up to a negative 50 points if WCDA determines the proposed project is located in an area of high concentration of low-income housing (p. 32).
A3. Mandatory requirements for development in high-opportunity areas	No.
A4a. Scoring that encourages development in high-income areas.	No.

<p>A4b. Scoring that encourages development in high opportunity areas.</p>	<ul style="list-style-type: none"> ❖ Up to 22 points for proximity to services. Starting with distance of 2 mi., an additional point for each 0.5 mile nearer in proximity. 3 points (up to 5) for grocery and retail shopping; 1 point (up to 3) for pharmacy, healthcare, public school (family projects), recreation center or park, senior center (senior projects) (p. 32).
<p>A5. Scoring or requirements that preference siting near high-quality schools.</p>	<ul style="list-style-type: none"> ❖ Up to 3 points in Proximity to Services category for a project located near a public school (p. 32). See A4b.
<p>A6. Scoring that discourages development in distressed neighborhoods.¹⁰⁴</p>	<ul style="list-style-type: none"> ❖ Up to a negative 200 points will be assessed if the project will need mitigation that has not been addressed and/or budgeted in accordance with HUD’s Part 58 Environmental Review Standards. A project may also receive negative points if it is located in or near a heavy industrial area (p. 32). ❖ (-) Up to 5 points if the project being developed is located in a QCT (p. 33). ❖ (-) See incentives for PBRA in G1. To the extent that this PBRA is located in distressed neighborhoods, this may work as a negative (p. 34). ❖ (-) 130% basis boost is available for projects located in a DDA (p. 55).
<p>A7. Scoring or requirements that preference siting near mass transit.</p>	<p>No.</p>
<p>A8. Focus on and operationalization of a neighborhood revitalization plan.</p>	<ul style="list-style-type: none"> ❖ Up to 10 points if the project being developed is located in a QCT and involves use of existing housing as part of a Community Revitalization Plan or until Community Revitalization Plan has been formally defined by HUD the IRS the community is actively reducing barriers associated with Affordable Housing (see notes) (p. 33).
<p>B1. Local participation in site selection is limited to statutory minimum.¹⁰⁵</p>	<ul style="list-style-type: none"> ❖ (-) Up to 35 points for contributions derived from non-federal sources (i.e. donated real estate, labor, materials, cash, or waiver of local

¹⁰⁴ 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.

¹⁰⁵ Evidence of the inverse: preferences or requirements for local participation should also be noted.

	fees etc.), which results in reduced project costs and reduced federal subsidy (p. 35).
HOUSING ACCESS: Affirmative Marketing, Priority Groups	
C1. Mandatory requirements ensuring affirmative marketing.	❖ Applications must include an Affirmative Fair Housing Marketing Agreement (p. 21).
C2. Scoring that incentivizes affirmative marketing.	No.
C3. Scoring that incentivizes 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 in high-opportunity areas.	❖ Preference for prospective tenants must be given to households on public housing waiting lists (p. 45).
F1. Incentives for larger family units.	❖ Large Families is a priority target population (p. 55).
F2. Incentives targeting families/families with children	❖ Families with Children is a priority target population (p. 55).
G1. Scoring that promotes units for lowest-income households (outside high-poverty areas).	❖ 10 points if the project is a new construction project with Project Based Rental Assistance (i.e. Project Based Vouchers, USDA RD property, etc.). 15 points if the project is a rehabilitation of an existing project with Project Based Rental Assistance (i.e. Project Based Vouchers, USDA RD property, etc.) (p. 34). See A6. ❖ Extremely Low Income is a priority target population (p. 55).
REPORTING REQUIREMENTS	
H1. Racial/demographic reporting requirements.	No.
OTHER CATEGORIES	
O1. Scoring that promotes units for persons with disabilities.	❖ Persons with Mental, Physical, and Developmental Disabilities are priority target populations (p. 55).
O2. Scoring that promotes units for special needs populations.	❖ Priority target populations include: Elderly, Frail Elderly, Chronic Homelessness, Mentally Ill, Chronic Substance Abuse, Veterans, Victims of Domestic Violence, Frail Elderly, Persons With Alcohol or Other Addictions, Persons with HIV/AIDS and their Families (p. 55).
O3. Scoring to promote home ownership.	
O4. Provisions affirmatively furthering fair housing laws.	❖ Applications must include certification of attendance of fair housing training by all project owners from a nationally-recognized

	<p>firm as approved by WCDA, completed within the past five years (p. 22).</p> <p>❖ If at any time WCDA becomes aware of a Fair Housing violation it will be reported to the appropriate officials which may include but will not be limited to HUD, and/or the Department of Justice (p. 44).</p>
Change since 2015?	A2; A6; F1/F2; G1; H1 O1/O2; O4

Affordable Housing Allocation Plan (2023): <https://www.wyomingcda.com/wp-content/uploads/2022/07/2023-AHAP.pdf>

NOTES:

TOTAL POINTS POSSIBLE: 514

Community actively reducing barriers associated with Affordable Housing, i.e.:

- a. Reducing or waiving fees or real estate tax concessions for Affordable Housing.
- b. Within the last year the Jurisdiction has convened or funded comprehensive studies, commissions, or hearings, or has established a formal ongoing process, to review, the rules, regulations, development standards and processes of the jurisdiction to assess their impact on the supply of Affordable Housing.
- c. Within the last year the Jurisdiction has initiated regulatory reforms as a result of the above.
- d. Jurisdiction has a single consolidated permit application process for housing development that includes building, zoning, engineering, environmental and related permits or “fast track” permitting and approvals for all affordable housing projects.
- e. Reduction or waiver of parking or green space requirements for all affordable housing developments.
- f. The jurisdiction has funded, directly or through partnerships, comprehensive studies of current and estimated housing needs taking into account the anticipated growth of the region, for existing and future residents, including low-, moderate-, and middle-income families for at least the next five years. Lower cost land development requirements for Affordable Housing developments, i.e. higher density, narrower streets, sidewalks on only one side of the street etc.

CHANGES SINCE 2015:

A2: Previously evaluated QAP had two scoring mechanisms awarding points for avoiding concentration of low-income households. One of those is no longer in the QAP. Additionally, large point deduction (-500) for affordable unit funding received by community in the last 4 years has been changed to up to 40 positive points.

A6: QAP contains incentives for siting projects in distressed areas—added points for locating in QCT, point incentives for PBRA, and basis boost for projects in a DDA.

F1/F2: Positive preference for families with children and large families by identifying them as priority target populations is new. Point award for targeting unit occupancy to Families or Individuals with Children has been removed.

G1: Negative point assessment for weighted average of the proposed rents being above market rate rents for the area was removed. Point awards for income targeting strategies and reservation of units to residents <30% AMI were removed. Small point incentives for PBRA were added.

H1: Requirement that owners keep records showing the ethnicity of each occupant for each restricted unit is no longer in the QAP.

O1/O2: Positive preferences for special needs populations and persons with disabilities by identifying them as priority target populations are new. Small point award for appropriate housing for the need identified in the Market Study regarding elderly and special needs is no longer in the QAP.

O4: Removed provision requiring submission of copies of filed fair housing complaints during compliance period. Added provision requiring certification of attendance of fair housing training by all project owners.